CWA ENFORCEMENT

CONTINUING EDUCATION
PROFESSIONAL DEVELOPMENT COURSE

Technical Learning College

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Internet Link to Assignment…
http://www.abctlc.com/downloads/PDF/CWAENFORCEMENTASS.pdf

State Approval Listing Link, check to see if your State accepts or has pre-approved this course. Not all States are listed. Not all courses are listed. Do not solely trust our list for it may be outdated. It is your sole responsibility to ensure this course is accepted for credit. No refunds.

Professional Engineers; Most states will accept our courses for credit but we do not officially list the States or Agencies acceptance or approvals.

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Some States and many employers require the final exam to be proctored.

Do not solely depend on TLC's Approval list for it may be outdated.

Most of our students prefer to do the assignment in Word and e-mail or fax the assignment back to us. We also teach this course in a conventional hands-on class. Call us and schedule a class today.

Responsibility

This course contains EPA's federal rule requirements. Please be aware that each state implements wastewater/pretreatment regulations that may be more stringent than EPA's or OSHA's regulations. Check with your state environmental agency for more information. You are solely responsible in ensuring that you abide with your jurisdiction or agency's rules and regulations.

Important Information about this Manual

This manual has been prepared to help students gain or increase awareness of the Environmental Protection Agency's Rules and Regulation relating to Title 40 Code of Federal Regulations, Part 403, "*General Pretreatment Regulations for Existing and New Sources of Pollution*," and other applicable State and Federal laws, including but not limited to, the Clean Water Act, Industrial pretreatment 40 CFR.

This course will cover the fundamentals and basic requirements of the federal rule concerning the national pretreatment rule, POTW, wastewater sampling and reporting information.

The scope of the material is quite large, requiring a major effort to bring it under control. Employee health and safety, as well as that of the public, depends upon careful application of federal and state regulations and safe working procedures.

This manual will cover federal laws, regulations, required procedures and work rules relating to general pretreatment and wastewater sampling. It should be noted, however, that the federal and state regulations are an ongoing process and subject to change over time. For this reason, a list of resources is provided to assist in obtaining the most up-to-date information on various subjects and regulations

This manual is an educational document for employees who are involved with water quality and pollution control. It is not designed to meet the full requirements of the United States Environmental Protection Agency (EPA) or the Department of Labor-Occupational Safety and Health Administration (OSHA), or your State pretreatment rules and regulations.

This course manual will provide general guidance and should not be used as a basis for developing general pretreatment, enforcement, reporting or wastewater sampling plans. This document is not a detailed pretreatment, pollution control, pollution prevention, wastewater treatment textbook or a comprehensive source book on water/wastewater rules and regulations.

Technical Learning College or Technical Learning Consultants, Inc. makes no warranty, guarantee or representation as to the absolute correctness or appropriateness of the information in this manual and assumes no responsibility in connection with the implementation of this information. It cannot be assumed that this manual contains all measures and concepts required for specific conditions or circumstances.

This document should be used for education and is not considered a legal document. Individuals who are responsible for pretreatment programs and/or water/wastewater sampling and the health and safety of workers at hazardous waste sites should obtain and comply with the most recent federal, state, and local regulations relevant to these sites and are urged to consult with OSHA, the EPA and other appropriate federal, state and local agencies.

Technical Learning College's Scope and Function

Welcome to the Program,

Technical Learning College (TLC) offers affordable continuing education for today's working professionals who need to maintain licenses or certifications. TLC holds several different governmental agency approvals for granting of continuing education credit.

TLC's delivery method of continuing education can include traditional types of classroom lectures and distance-based courses or independent study. TLC's distance based or independent study courses are offered in a print - based distance educational format. We will beat any other training competitor's price for the same CEU material or classroom training.

Our courses are designed to be flexible and for you do finish the material on your leisure. Students can also receive course materials through the mail. The CEU course or e-manual will contain all your lessons, activities and instruction to obtain the assignments. All of TLC's CEU courses allow students to submit assignments using e-mail or fax, or by postal mail. (See the course description for more information.)

Students have direct contact with their instructor—primarily by e-mail or telephone. TLC's CEU courses may use such technologies as the World Wide Web, e-mail, CD-ROMs, videotapes and hard copies. (See the course description.) Make sure you have access to the necessary equipment before enrolling, i.e., printer, Microsoft Word and/or Adobe Acrobat Reader. Some courses may require proctored closed-book exams depending upon your state or employer requirements.

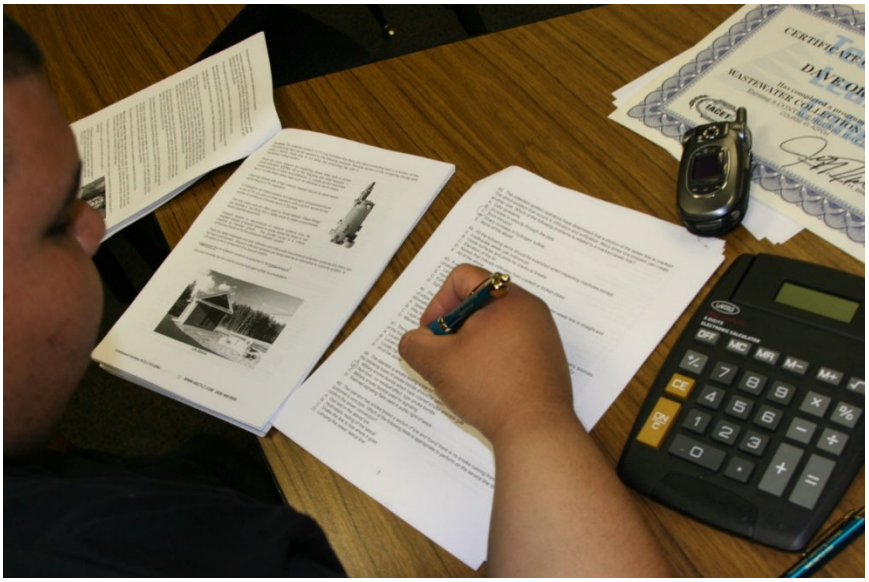
Flexible Learning
At TLC, there are no scheduled online sessions or passwords you need contend with, nor are you required to participate in learning teams or groups designed for the "typical" younger campus based student. You can work at your own pace, completing assignments in time-frames that work best for you. TLC's method of flexible individualized instruction is designed to provide each student the guidance and support needed for successful course completion.

Course Structure
TLC's online courses combine the best of online delivery and traditional university textbooks. You can easily find the course syllabus, course content, assignments, and the post-exam (Assignment). This student friendly course design allows you the most flexibility in choosing when and where you will study.

Classroom of One
TLC offers you the best of both worlds. You learn on your own terms, on your own time, but you are never on your own. Once enrolled, you will be assigned a personal Student Service Representative who works with you on an individualized basis throughout your program of study. Course specific faculty members (S.M.E.) are assigned at the beginning of each course providing the academic support you need to successfully complete each course. Please call or email us for assistance.

No Data Mining Policy
Unlike most online training providers, we do not use passwords or will upload intrusive data mining software onto your computer. We do not use any type of artificial intelligence in our program. Nor will we sell you any other product or sell your data to others as with many of our competitors. Unlike our training competitors, we have a telephone and we humanly answer.

Satisfaction Guaranteed
We have many years of experience, dealing with thousands of students. We assure you, our customer satisfaction is second to none. This is one reason we have taught more than 20,000 students.



We welcome you to do the electronic version of the assignment and submit the answer key and registration to us either by fax or e-mail. If you need this assignment graded and a certificate of completion within a 48-hour turn around, prepare to pay an additional rush charge of $50.

Contact Numbers
Fax (928) 468-0675
Email Info@tlch2o.com
Telephone (866) 557-1746

CEU Course Description

CWA-ENFORCEMENT CEU TRAINING COURSE

Intended Audience
Stormwater Inspectors, Wastewater Treatment Operators, Pretreatment and Industrial Waste Inspectors--the target audience for this course is the person interested in working in the stormwater/pretreatment field. This course was designed for the pretreatment inspector or for the wastewater treatment/wastewater collection operator who performs various pretreatment related job duties. This course is also for operators wishing to maintain CEUs for certification license, wanting to learn how to do the job safely and effectively, and/or to meet education needs for promotion. This CEU Course will review the Environmental Protection Agency's Rules and Regulation relating to Title 40 Code of Federal Regulations, Part 403, "*General Pretreatment Regulations for Existing and New Sources of Pollution*," and other applicable State and Federal laws, including but not limited to, the Clean Water Act and the Industrial Pretreatment 40 CFR. This course will cover the fundamentals and basic requirements of the Federal rule concerning the National Pretreatment Rule, POTW, wastewater sampling and reporting information.

Final Examination for Credit
Opportunity to pass the final comprehensive examination is limited to three attempts per course enrollment.

Course Procedures for Registration and Support
All of Technical Learning College's distance learning courses have complete registration and support services offered. Delivery of services will include, e-mail, web site, telephone, fax and mail support. TLC will attempt immediate and prompt service.

When a student registers for a distance or correspondence course, he/she is assigned a start date and an end date. It is the student's responsibility to note dates for assignments and keep up with the course work. If a student falls behind, he/she must contact TLC and request an end date extension in order to complete the course. It is the prerogative of TLC to decide whether to grant the request. All students will be tracked by a unique number assigned to the student.

Instructions for Written Assignments
The CWA Enforcement CEU Training course uses a multiple-choice style answer key.

Feedback Mechanism (examination procedures)
Each student will receive a feedback form as part of his or her study packet. You will find this form in the rear of the course or lesson.

Security and Integrity
All students are required to do their own work. All lesson sheets and final exams are not returned to the student to discourage sharing of answers. Any fraud or deceit and the student will forfeit all fees and the appropriate agency will be notified.

Grading Criteria
TLC will offer the student either pass/fail or a standard letter grading assignment. If TLC is not notified, you will only receive a pass/fail notice.

Required Texts
The CWA Enforcement CEU Training course comes complete with the Environmental Protection Agency's Rules and Regulation relating to Title 40 Code of Federal Regulations, Part 403, "General Pretreatment Regulations for Existing and New Sources of Pollution," and other applicable State and Federal laws, including but not limited to, the Clean Water Act and Industrial Pretreatment 40 CFR.

This course will cover the fundamentals and basic requirements of the federal rule concerning pretreatment, POTW, SIU responsibilities, wastewater sampling and reporting information.

Recordkeeping and Reporting Practices
TLC will keep all student records for a minimum of seven years. It is the student's responsibility to give the completion certificate and any other forms to the appropriate agencies. TLC will not release any records to any other party.

ADA Compliance
TLC will make reasonable accommodations for persons with documented disabilities. Students should notify TLC and their instructors of any special needs. Course content may vary from this outline to meet the needs of this particular group.

Mission Statement
Our only product is educational service. Our goal is to provide you with the best possible education service possible. TLC will attempt to make your learning experience an enjoyable opportunity.

Educational Mission
The educational mission of TLC is:
To provide TLC students with comprehensive and ongoing training in the theory and skills needed for the environmental education field,

To provide TLC students with opportunities to apply and understand the theory and skills needed for operator certification,

To provide opportunities for TLC students to learn and practice environmental educational skills with members of the community for the purpose of sharing diverse perspectives and experience,

To provide a forum in which students can exchange experiences and ideas related to environmental education,

To provide a forum for the collection and dissemination of current information related to environmental education, and to maintain an environment that nurtures academic and personal growth.

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Compliance Acronym Glossary

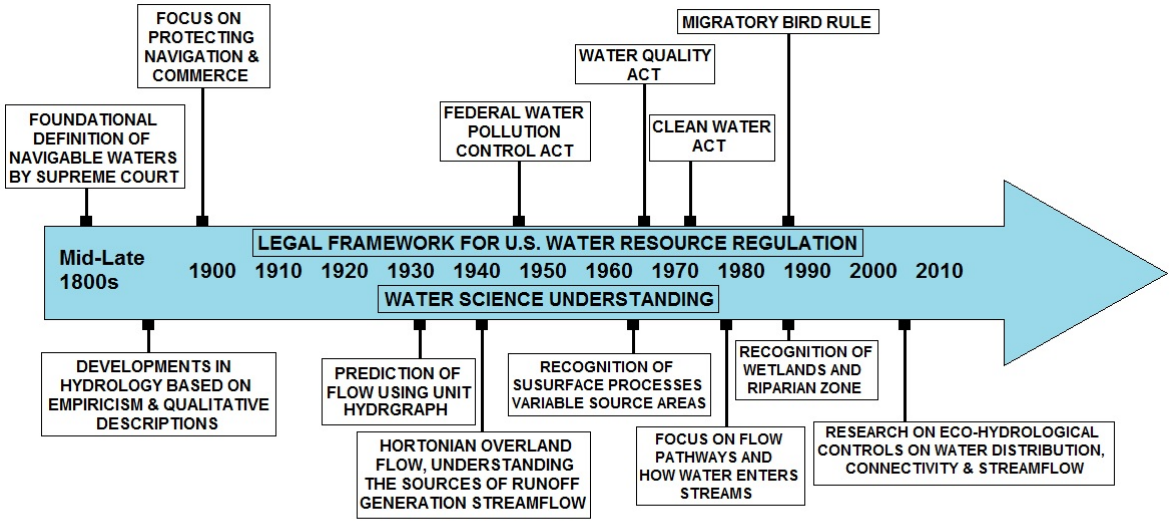
Acronym	Full Phrase
AA	Approval Authority
AO	Administrative Order
BAT	Best Available Technology Economically Achievable
BCT	Best Conventional Pollutant Control Technology
BMP	Best Management Practices
BMR	Baseline Monitoring Report
BOD5	5-day Biochemical Oxygen Demand Test
BPJ	Best Professional Judgment
BPT	Best Practicable Control Technology Currently Available
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub. L. 92-500, as amended by Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483, Pub. L. 97-117, and Pub. L. 100-4, 33 U.S.C. 1251 et seq.
CWF	Combined Wastestream Formula
CWT	Centralized Waste Treater
DMR	Discharge Monitoring Report
DSE	Domestic Sewage Exclusion
DSS	Domestic Sewage Study
ELG	Effluent Limitations Guideline
EPA	Environmental Protection Agency
EPCRA	Emergency Preparedness and Community Right to Know Act
ERP	Enforcement Response Plan
FOG	Fats, Oils and Grease
FDF	Fundamentally Different Factors
FR	Federal Register
FWA	Flow Weighted Average
GPD	Gallons per Day
HABS	Harmful Algae Blooms
IU	Industrial User
LEL	Lower Explosive Limit
MAHL	Maximum Allowable Headworks Loading
MAIL	Maximum Allowable Industrial Loading
MGD	Million Gallons per Day
MPN	Most Probable Number
MSDS	Material Safety Data Sheet –Replaced By SDS, Safety Data Sheet
NAICS	North American Industry Classification System (replaces SIC 1998)
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council

NSPS	New Source Performance Standard
O&G	Oil and Grease
O&M	Operations and Maintenance
OCPSF	Organic Chemicals, Plastics, and Synthetic Fibers
P2	Pollution Prevention
PCA	Federal Water Pollution Control Act
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
PSES	Pretreatment Standards for Existing Sources
PSNS	Pretreatment Standards for New Sources
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
SIC	Standard Industrial Classification
SIU	Significant Industrial User
SPCC	Spill Prevention Control and Countermeasures
SNC	Significant Noncompliance
SSO	Sanitary Sewer Overflow
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leaching Procedure
TIE	Toxicity Identification Evaluation
TOMP	Toxic Organic Management Program
TRE	Toxicity Reduction Evaluation
TRI	Toxic Release Inventory
TSS	Total Suspended Solids
TTO	Total Toxic Organics
USC	United States Code
UST	Underground Storage Tank
WET	Whole Effluent Toxicity
WWTP	Wastewater Treatment Plant
µ	Micron

National Pretreatment Program Overview

The Clean Water Act

On October 18, 1972, the 92nd Congress of the United States passed the Federal Water Pollution Control Act (PCA) Amendments of 1972, declaring the restoration and maintenance of the chemical, physical, and biological integrity of the Nation's water as a National Objective. While procedures for implementing this act (more commonly referred to as the Clean Water Act (CWA)) have been re-evaluated and modified over time, the 1972 objective has remained unchanged in its 48-year history.



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CLEAN WATER ACT TIMELINE

The 1972 Amendments to the CWA established a water quality regulatory approach along with the EPA-promulgated industry-specific technology-based effluent limitations. The National Pollutant Discharge Elimination System (NPDES) permit program was established under the CWA to control the discharge of pollutants from point sources and served as a vehicle to implement the industrial technology-based standards. To implement pretreatment requirements, the EPA promulgated 40 CFR Part 128 in late 1973, establishing general prohibitions against treatment plant interference and pass through and pretreatment standards for the discharge of incompatible pollutants from specific industrial categories.

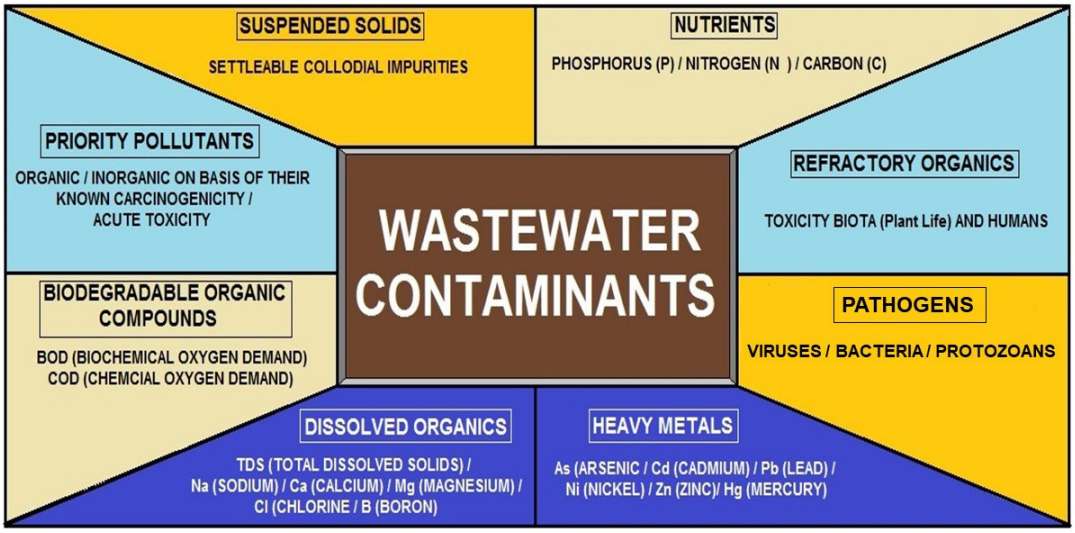
In 1975, several environmental groups filed suit against the EPA, challenging it's criteria for identifying toxic pollutants, the EPA's failure to promulgate effluent standards, and the EPA's failure to promulgate pretreatment standards for numerous industrial categories.

As a result of this litigation, the EPA promulgated the General Pretreatment Regulations at 40 CFR Part 403 on June 26, 1978, replacing the 40 CFR Part 128 requirements. Additionally, as a result of the suit, the EPA agreed to regulate the discharge of 65 categories of pollutants (making up the 126 priority pollutants presented in Figure 4) from 21 industrial categories. The list of priority pollutants is still in effect today (the original list actually had 129 pollutants, three of which have since been removed from that list) while the list of regulated industrial categories has grown to more than 51 distinct industries.

Section 101 of the Clean Water Act (CWA)

To restore and maintain the chemical, physical, and biological integrity of the Nation's waters:
(1) it is the national goal that the discharge of pollutants into the navigable waters be eliminated by 1985;
(2) it is the national goal that wherever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water be achieved by July 1, 1983;
(3) it is the national policy that the discharge of toxic pollutants in toxic amounts be prohibited;
(4) it is the national policy that Federal financial assistance be provided to construct publicly owned waste treatment works;
(5) it is the national policy that Area wide waste treatment management planning processes be developed and implemented to assure adequate control of sources of pollutants in each State;
(6) it is the national policy that a major research and demonstration effort be made to develop technology necessary to eliminate the discharge of pollutants into the navigable waters, waters of the contiguous zone, and the oceans; and
(7) it is the national policy that programs for the control of nonpoint sources of pollution be developed and implemented in an expeditious manner so as to enable the goals of this Chapter to be met through the control of both point and nonpoint sources of pollution.

Treated wastewater outfall.



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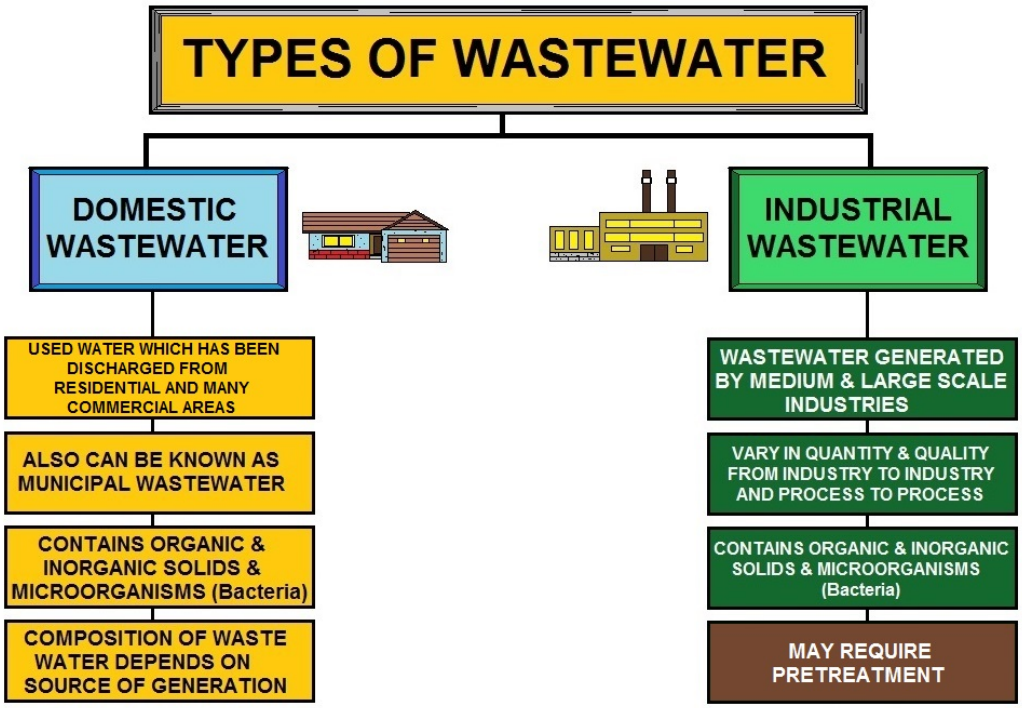
TYPES OF WASTEWATER CONTAMINANTS



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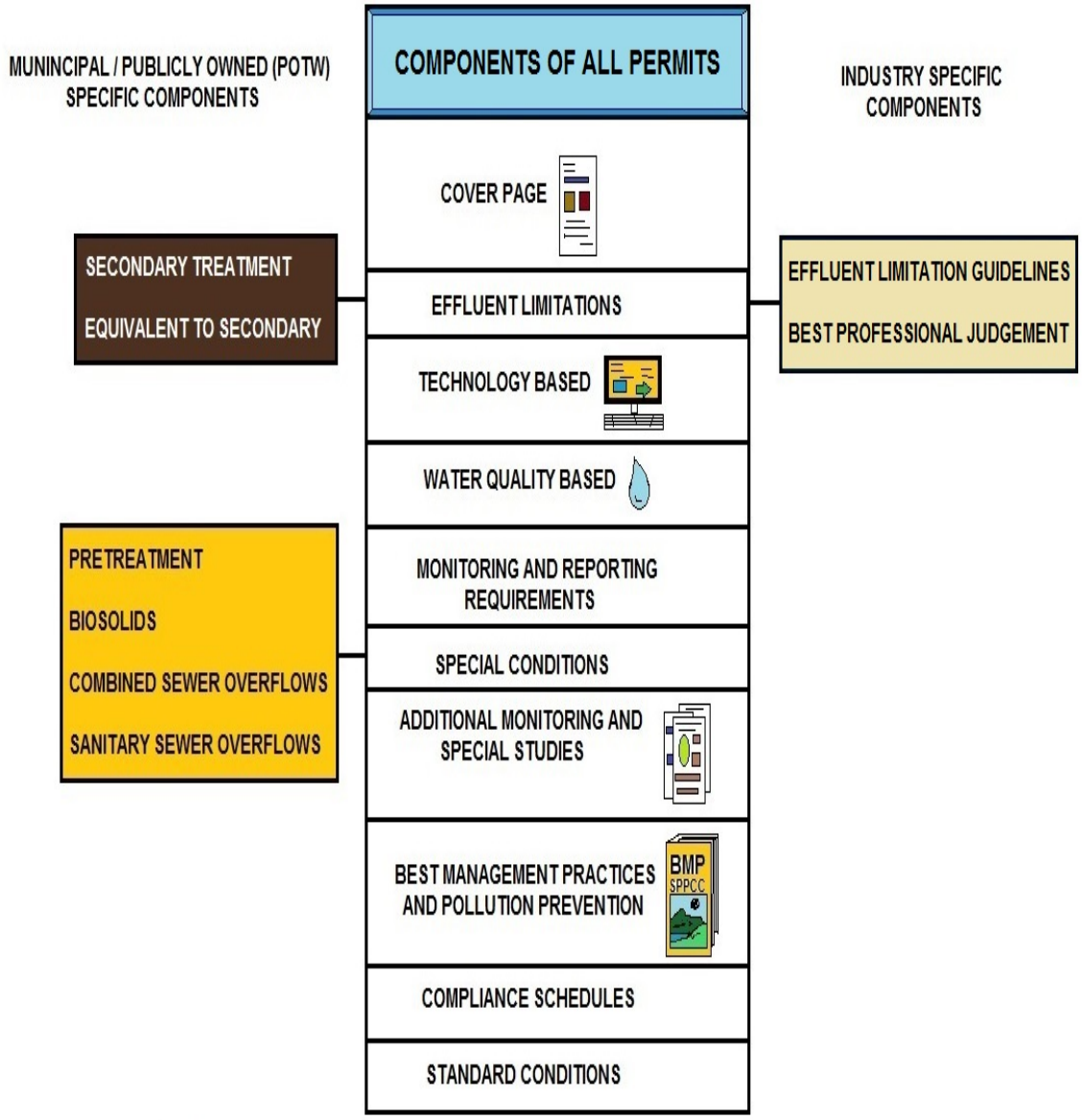
WASTEWATER TYPES

The diagram above shows the difference between domestic wastewater and industrial wastewater



NPDES PERMIT COMPONENTS

NPDES Permit Foreword

Once a wastewater plant is designed and built, state or federal agencies will determine the type of permit required using the information illustrated above. You will need to understand that this discharge permit is your legal standard for proper sampling, treatment and discharging. You must abide by your permit and not deviate from this requirement based on information based in this course by the course information.

You must abide by your permit requirements and not deviate from them based on information presented in this course.

Pretreatment Program Defined

The term "pretreatment" refers to the requirement that non-domestic sources discharging wastewater to POTWs control their discharges, and meet limits established by the EPA, and/or your state or the local municipality (Control Authority) on the amount of pollutants allowed to be discharged. The control of the pollutants may necessitate treatment prior to discharge to the POTW (therefore the term "pretreatment").

Limits may often be met by the non-domestic source through pollution prevention techniques (product substitution, recycle and reuse of materials, more efficient production practices, improved environmental management systems, etc.), pretreatment of wastewater, or implementation of best management practices.

The National Pretreatment Program is a cooperative effort of federal, state, and local regulatory environmental agencies established to protect water quality. The program is designed to reduce the level of pollutants discharged by industry and other non-domestic wastewater sources into municipal sewer systems, and thereby, reduce the amount of pollutants released into the environment from these sources.

The national pretreatment program was established by Congress under authority of the Federal Water Pollution Control Act of 1972 (Pub. L. 92-500) as amended by the Clean Water Act of 1977 (Pub. L. 95-217). Implementation requirements of the pretreatment portions of these laws were first codified into 40 Code of Federal Regulations (CFR) Part 403 in 1978.

Objectives of the pretreatment program:

1. Protect publicly owned treatment works (POTW) from pollutants that may cause interference with sewage treatment plant operations.
2. Prevent introducing pollutants into a POTW that could cause pass through of untreated pollutants to receiving waters.
3. Manage pollutant discharges into a POTW to improve opportunities for reuse of POTW wastewater and residuals (sewage sludge).
4. Prevent introducing pollutants into a POTW that could cause worker health or safety concerns, or that could pose a potential endangerment to the public or to the environment.

POTWs

Publicly owned treatment works (POTWs) collect wastewater from homes, commercial buildings, and industrial facilities and transport it via a series of pipes, known as a collection system, to the treatment plant. Here, the POTW removes harmful organisms and other contaminants from the sewage so it can be discharged safely into the receiving stream. Generally, POTWs are designed to treat domestic sewage only.

However, POTWs also receive wastewater from industrial (non-domestic) users. The General Pretreatment Regulations establish responsibilities of Federal, State, and local government, industry and the public to implement Pretreatment Standards to control pollutants from the industrial users which may pass through or interfere with POTW treatment processes or which may contaminate sewage sludge.

National Pretreatment Program

The National Pretreatment Program identifies specific requirements that apply to all IUs, additional requirements that apply to all SIUs, and certain requirements that only apply to CIUs.

The objectives of the National Pretreatment Program are achieved by applying and enforcing three types of discharge standards:

- **prohibited discharge standards**
- **categorical Pretreatment standards**
- **local limits**

Prohibited Discharge Standards Introduction *(Credit USEPA)*

Prohibited discharge standards are somewhat general, national standards are applicable to all industrial users to a POTW, regardless of whether or not the POTW has an approved pretreatment program or the industrial user has been issued a permit.

These standards are designed to protect against pass through and interference, protect the POTW collection system, and to promote worker safety and beneficial biosolids use. These standards are listed in 40 CFR 403.5

For Final Regulations pertaining to the Pretreatment Program, refer to 40 CFR Part 403 general pretreatment regulations (Located in the rear of this course).

Categorical Pretreatment Standards

Categorical Pretreatment Standards are limitations on pollutant discharges to publicly owned treatment works (POTWs), promulgated by the EPA in accordance with Section 307 of the Clean Water Act that apply to specific process wastewaters of particular industrial categories.

These are national, technology-based standards that apply regardless of whether or not the POTW has an approved pretreatment program or the industrial user has been issued a permit. Such industries are called Categorical Industrial Users. The standards applicable to industrial discharges to a POTW collection system are designated in the Effluent Guidelines & Limitations [Parts 405-471] by the terms "Pretreatment Standards for Existing Sources" (or "PSES") and "Pretreatment Standards for New Sources" (or "PSNS").

Note: The Effluent Guidelines & Limitations designated by the terms "Best Practicable Control Technology Currently Available (BPT)", "Best Available Technology Economically Achievable (BAT)", "Best Conventional Pollutant Control Technology (BCT)", and "New Source Performance Standards (NSPS)" apply to industries that discharge process wastewater to waters of the U.S. and should have a National Pollutant Discharge Elimination System (NPDES) Permit.

Regulations for all Effluent Guidelines and Standards are located at: http://www.epa.gov/

Additional information on ongoing Categorical Standards Projects and recently published rules is located at: http://www.epa.gov/

Conventional Pollutants Introduction *(Credit USEPA)*

BOD, TSS, fecal coliform, oil and grease, and pH

In the above photo, sampling equipment after being washed and being allowed to air dry. You as a Sampler will spend up to 1-2 hours a day preparing your sample bottles. This may include washing your sample tools, bottles and other equipment.

Some bottles will need to be washed in a three or four step process. Hydrochloric and other acids are used for the cleaning of glass bottles. The Pickle jar or large jar is often re-used and washed on a daily basis.

Pretreatment Inspectors and Stormwater Inspectors will often work in pairs. Usually one Inspector will spend a lot of time setting up automatic samplers and programming flow meters, while the other Inspector will calibrate pH meters and related laboratory equipment, pre-preserve sample bottles, gather ice and calibrate the safety equipment and gas meters.

Some POTWs will hire both Samplers and Inspectors and split these duties up. Other POTWs will utilize Inspectors as Samplers.

Parshall Fume and Ultrasonic Flow Meter.

Notice the debris, most POTW's will write a NOV for uncleanness, the POTW's that do not write NOV's will usually not have an ordinance in place.

Professor Melissa Durbin in her water quality/pollution control days as a pretreatment inspector. Since then she has taught thousands of operators the skills necessary to become an effective inspector.

Monthly Average
The arithmetic average value of all samples taken in a calendar month for an individual pollutant parameter. The monthly average may be the average of all grab samples taken in a given calendar month, or the average of all composite samples taken in a given calendar month.

The Need for the Pretreatment Program

The average American uses roughly 100 to 200 gallons of water a day, with less than one percent of that water actually being consumed.

The rest is used for activities such as washing, preparing food, watering lawns, heating and cooling, transporting wastes, and fire protection. The public is very conscious about the quality of water that comes out of their tap each day, quickly notifying authorities of changes in appearance, odor, and taste.

These same Americans, on average, discharge about the same amount of wastewater to local sewage treatment plants daily. This wastewater (commonly referred to as "*domestic sewage*") receives much less attention than drinking water, likely the result of an "out of sight, out of mind" attitude.

Most people take it for granted that once down the drain, wastes will be handled appropriately. In fact, this attitude has carried over to industry as well, as can be seen by reading the labels of many household products. These labels often recommend that waste or excess product be disposed of down the drain. Other toxic or hazardous products are actually designed to be disposed of down the drain (e.g., drain clog remover).

Recall the phosphate detergent problems of the late 1960s and early 70s; large doses of phosphate, found in most detergents at the time, were passing through municipal treatment plants and overloading lakes, causing large algal blooms to form and subsequently reducing available light, food and oxygen for fish and other aquatic organisms. While great strides have been taken to address the phosphate problem, it is possible that other problematic pollutants are being dumped down the drain at the expense of human health and the environment.

INTERFERENCE

Interference: a discharge from an industrial user that, alone or in conjunction with other sources a) inhibits or disrupts a POTW plant, its treatment processes or operations, or its sludge processes, use, or disposal, and b) therefore causes a violation including increasing a violation's magnitude or duration of any permit or rule that controls release of pollutants from the POTW.

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GENERAL PROHIBITIONS

The federal pretreatment regulations at 40 CFR Part 403.5(a)(1) includes **"general prohibitions"** for industrial users stating that no user shall introduce into a POTW any pollutant(s) which causes pass through or interference. The federal regulations also established specific prohibitions for users.

DENTAL CATEGORY

EPA's Effluent Limitations Guidelines and Standards for the **Dental Category**, also known as the Dental Amalgam Rule, went into effect for new sources on July 14, 2017. New dental offices that place or remove amalgam fillings must now install and maintain dental amalgam separators, follow best **management practices (BMPs),** and submit a one-time compliance report to their POTW or other pretreatment control authority. New dental offices must submit their compliance report no later than 90 days after beginning discharge of wastewater to a POTW.

CATEGORICAL INDUSTRIAL USER

A **categorical industrial user** is an industry or entity which is subject to categorical standards. The wastewater from an entity or industry discharging into a sewer system tributary to a POTW (industrial user - IU) may be as simple and uncomplicated as that of a coin-operated car wash or as complex as an automobile manufacturing plant or a synthetic organic chemical producer. The IUs discharging complex wastewater would likely be subject to categorical standards, which is one of the defining criteria for significant industrial users.

As a wastewater manager or pretreatment inspector, you should be memorizing these terms (see above boxes). These USEPA terms are essential for any successful pretreatment inspector to communicate with the public. Most wastewater treatment operators know these terms.

Applicability of Pretreatment Standards and Requirements

The national pretreatment program objectives are achieved by applying and enforcing three types of pretreatment standards:

- General and specific prohibitions
- Categorical pretreatment standards
- Local limits

All three types of standards can be enforced by EPA, the state, and local government, even though they are developed at different levels of government (i.e., federal, state, and local). Pretreatment standards and requirements can be expressed as numeric limits, narrative prohibitions, and best management practices. The most effective and practical ways to control pollutants and meet environmental quality goals. BMPs exist for forestry, agriculture, stormwater and many other sectors. (BMPs The most effective and practical ways to control pollutants and meet environmental quality goals. BMPs exist for forestry, agriculture, stormwater and many other sectors.).

IUs should be aware of the standards that apply to them. The control authority, in the case of a POTW with an approved pretreatment program, or the Approval Authority, in the case of a POTW without an approved pretreatment program. [paraphrased from 40 CFR 403.3(f)] is responsible for identifying standard(s) applicable to each IU and applying the most stringent requirements where multiple provisions exist.

The different pretreatment standards are applied to IUs, significant industrial users (SIU (1) All users subject to categorical pretreatment standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N, except those designated as NSCIUs; and (2) Any other IU that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blowdown wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry-weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the POTW on the basis that the IU has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)]. [40 CFR 403.3(v)]s), and categorical industrial users (CIUs) as follows:

	General and Specific Prohibitions	Categorical Pretreatment Standards	Local Limits
All IUs	**X**		May apply; depends on publicly owned treatment works (POTW) ordinance and permit provisions

SIUs	**X**		Generally apply; may depend on allocation method
CIUs	**X**	**X**	Generally apply; may depend on allocation method

FOG Introduction

Keeping Fats, Oils, and Grease out of the Sewer System
Fats, oils, and grease (FOG) comes from meat fats in food scraps, cooking oil, shortening, lard, butter and margarine, gravy, and food products such as mayonnaise, salad dressings, and sour cream.

FOG poured down kitchen drains accumulates inside sewer pipes and cause damage to the collection system. As the FOG builds up, it restricts the flow in the pipe and can cause untreated wastewater to back up into homes and businesses, resulting in high costs for cleanup and restoration.

Manholes can overflow into parks, yards, streets, and storm drains, allowing FOG to contaminate local waters, including drinking water. Exposure to untreated wastewater is a public-health hazard and is an EPA violation. FOG discharged into septic systems and drain fields can cause malfunctions, resulting in more frequent tank pump-outs and other expenses.

Restaurants, cafeterias, and fast-food establishments spend tens of thousands of dollars on plumbing emergencies each year to deal with grease blockages and pump out grease traps and interceptors. Some cities also charge businesses for the repair of sewer pipes and spill cleanup if they can attribute the blockage to a particular business.

Some cities also add a surcharge to wastewater bills if a business exceeds a specified discharge limit. These expenses can be a significant.

Communities spend billions of dollars every year unplugging or replacing grease-blocked pipes, repairing pump stations, and cleaning up costly and illegal wastewater spills. Excessive FOG in the sewer system can affect local wastewater rates. So, keeping FOG out of the sewer system helps everyone in the community.

Controlling Fats, Oils, and Grease Discharges from Food Service Establishments
FOG gets into our sewer collection system mainly from residential customers pouring the substances down their drains and from commercial food preparation establishments with inadequate grease controls. Fats, oils and grease are a byproduct of cooking and are mostly found in the following:

- ✓ Meats
- ✓ Cooking oil
- ✓ Lard or shortening
- ✓ Butter or margarine

Our sewer system is not designed to handle or treat these substances in excess. Over time, without proper disposal of fats, oils and grease, they build up in the sewer system and eventually block collection pipes and sewer lines, resulting in sewer backups and overflows on streets, properties and even in customers' homes and/or businesses. Overflows may also impact the environment negatively and can result in contamination of ponds, streams or rivers.

Food Service Establishments (FSEs)
Food Service Establishments (FSEs) are a significant source of fats, oil and grease (FOG) because of the amount of grease used in cooking. POTW Commercial FOG Programs are generally developed to assist restaurants and other FSEs with proper handling and disposal of their FOG. Through implementation of Best Management Practices (BMPs), these establishments should be able to significantly reduce the amount of FOG that goes down their drains. This will minimize back-ups and help business owners comply with the POTW's requirements.

To work effectively, sewer systems need to be properly maintained, from the drain to the treatment plant. If wastes are disposed of correctly, the POTW's sewer system can handle them without any problem. Grease is an example of a waste that the sewer system cannot handle, and therefore should not be put down the drain.

The POTW needs businesses and individuals to do their part to maintain the system because repeated repairs are disruptive to residences and businesses alike. Furthermore, proper disposal by commercial establishments is required by law.

Environmental Problems with FOG sewers
FOG that enters the sewer system eventually solidifies and forms grease balls. These grease balls can range in size from marbles to the size of cantaloupes and must be removed periodically. Since the sewer system is unable to handle or treat these substances effectively, this incurs greater expenditures on the maintenance of the collection systems and/or treatment plants which in turn can lead to higher customer rates.

Sewer backups can also cost customers thousands of dollars for the repair or replacement of their damaged property.

Local Limits Introduction *(Credit USEPA)*

Local limits are developed to reflect specific needs and capabilities at individual POTWs and designed to protect the POTW receiving waters. Regulations at 40 CFR 403.8(f)(4) state that POTW Pretreatment Programs must develop local limits or demonstrate that they are unnecessary; 40 CFR 403.5(c) states that local limits are needed when pollutants are received that could result in pass through or interference at the POTW. Essentially, local limits translate the general prohibited discharge standards of 40 CFR 403.5 to site-specific needs.

Assistance on how to develop local limits may be found in the Guidance Manual for the Development and Implementation of Local Discharge Limitations under the Pretreatment Program.). Information related to ordering this publication from the Office of Wastewater Management is located at: http://www.epa.gov/.

The EPA Supplemental Manual on the Development And Implementation of Local Discharge Limitations Under the Pretreatment Program: Residential and Commercial Toxic Pollutant Loadings and POTW Removal published May 1, 1991 provides information related to residential and commercial sources of toxic pollutants and estimated removal efficiencies of municipal treatment processes.

Two automatic wastewater samplers, one for Local Limits or compliance and the other for the wastewater plant operator to determine plant efficiency.

LOCAL LIMITS

Delegated POTWs must control SIUs individually and not impose limits on them that may allow violations of the general or specific prohibitions. The POTW generally should impose required local limits (limits imposed by POTW to prevent interference or pass-through) for all SIUs, and is required to when interference or pass-through has occurred and may reoccur. A POTW also must evaluate **local limits** if an SIU causes interference or pass-through without violating a **local limit**. In addition to required local limits, a POTW may set other local limits not required by pretreatment rules. The State can enforce required local limits, but cannot enforce the non-required limits.

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LOADING LIMITS

In the context of an NPDES permit, a loading limit determines the amount of a pollutant (in pounds per day) which can be discharged in wastewater effluent. The loading limit is generally based upon the allowable concentration of the pollutant and a design flow rate for the discharge.

The loading limit would be calculated as follows:
loading limit = Flow million gallons/day x 8.34 lbs/gallon x Concentration mg/L

Loading limits are normally not included in indirect discharge permits, with an exception being permits for food processors.

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As a pretreatment inspector, you should be memorizing these terms (see above boxes). These USEPA terms are essential for any successful pretreatment inspector to communicate with the public.

Key Review Notes

CONVENTIONAL POLLUTANTS

POTWs are designed to treat typical household wastes and biodegradable commercial and biodegradable industrial wastes. The Clean Water Act defines the contaminants from these sources as **conventional pollutants**. **Conventional pollutants** are biological oxygen demand (BOD), total suspended solids (TSS), fecal coliform, oil and grease, and pH**.**

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GENERAL PROHIBITIONS

The federal pretreatment regulations at 40 CFR Part 403.5(a)(1) includes **"general prohibitions"** for industrial users stating that no user shall introduce into a POTW any pollutant(s) which causes pass through or interference. The federal regulations also established specific prohibitions for users.

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INDIRECT DISCHARGE

An **indirect discharge** is represented by an industry or business which sends wastewater to a sewer system tributary to a POTW in contrast to discharging directly into state surface waters. While **direct discharges** to surface waters are regulated under the NPDES permit program, indirect discharges are regulated as a component of the NPDES Permitting Program through the National Pretreatment Program. The National Pretreatment Program requires industrial and commercial dischargers to treat or control pollutants in their wastewater prior to discharge to POTWs.

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CATEGORICAL STANDARDS

Categorical standards are technology-based limitations on pollutant discharges to POTWs, which have been promulgated by U.S. EPA in accordance with Section 307 of the Clean Water Act, and apply to specific process wastewater discharges for thirty-two (32) different industrial categories. (Categorical standards can be found in 40 CFR Parts 405-471.) Categorical standards are similar to federal effluent guidelines (FEGs), with two important distinctions:

- **categorical standards** apply to indirect discharges while FEGs apply only to direct discharges to surface waters; and
- **categorical standards** are developed with the assumption that the POTW will remove at least small amounts of a pollutant, therefore the categorical standard for the pollutant will be less stringent than the corresponding best available technology (BAT) limits for the FEG applied to a direct discharger

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In this photo, the Lab Tech is waiting for the Sampler to return with samples. You can see the small refrigerator with a lock on it. Samplers will normally release the samples to the Chemist, but if the Chemist is out of the office, or after work hours, you will place the samples in the refrigerator and lock it. Write on your chain-of-custody report that you placed the samples in the locked refrigerator.

Chain-of-Custody (COC)
A record of each person involved in the possession of a sample from the person who collects the sample to the person who analyzes the sample in the laboratory.

Discharge to POTW *(Credit to USEPA)*

POTWs are not designed to treat toxics in industrial waste. As such, these discharges, from both industrial and commercial sources, can cause serious problems. The undesirable outcome of these discharges can be prevented using treatment techniques or management practices to reduce or eliminate the discharge of these contaminants. The act of treating wastewater prior to discharge to a POTW is commonly referred to as "**pretreatment**." The National Pretreatment Program, published in **Title 40 Code of Federal Regulations (CFR) Part 403**, provides the regulatory basis to require non-domestic dischargers to comply with pretreatment standards (effluent limitations) to ensure that the goals of the CWA are attained.

As noted in 40CFR §403.2, the objectives of the National Pretreatment Program are to:
a. Prevent the introduction of pollutants into POTWs which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;
b. Prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works; and
c. Improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.

The two key terms used in the EPA's objectives for the National Pretreatment Program, "***interference***" and "***pass through***," are defined below.

Definitions
Interference - a discharge which, alone or in conjunction with a discharge or discharges from other sources, both inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal, and- therefore is a cause of a violation of any NPDES permit requirement or of the prevention of sewage sludge use or disposal in compliance with any applicable requirements.

Pass Through - a discharge which exits the POTW into waters of the U.S. in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any NPDES permit requirement.

As outlined in the EPA's objectives, toxic pollutants may pass through the treatment plant into the receiving stream, posing serious threats to aquatic life, to human recreation, and to consumption of fish and shellfish from these waters. Pass through can make waters unswimmable or unfishable in direct contrast to the goals of the CWA. Or, these discharges can interfere with the biological activity of the treatment plant causing sewage to pass through the treatment plant untreated or inadequately treated.

Problems Associated With Toxic Discharges *Figure 3*

Air pollution can occur from volatilization of toxic chemicals in the POTW collection system or treatment plant, or through incineration of sewage sludge.
Corrosion of collection system and treatment plant from acidic discharges or discharges containing elevated levels of sulfate (forming toxic and corrosive hydrogen sulfide).
Groundwater pollution can occur from leaks in the collection system or pollutants from contaminated sewage sludge.

Toxic Emissions *(Credit to USEPA)*

Toxic metals can inhibit both aerobic and anaerobic bacteria. Though many toxic metals will pass-through, some will end up in a POTW's Biosolids. This not only disrupts sludge digestion, but the contamination may also limit the available sludge disposal options.

Even where the POTW has the capability to remove these toxics, the pollutants may end up in the sewage sludge, thereby limiting sludge disposal options or escalating the cost of disposal. Incinerated contaminated sludge may release toxic emissions into the atmosphere. Toxic metals removed in primary treatment, while itself not an inhibitory process, can impact sludge digestion, a process that utilizes bacteria to stabilize sludge solids.

For example, chromium can inhibit reproduction of aerobic digestion microorganisms, thereby disrupting sludge treatment and producing sludges that must be disposed of with special treatment. Uncontaminated sludge, on the other hand, can be used as fertilizer or soil conditioner, thereby improving the productivity of our land. Many municipalities apply sewage sludge to pastureland or parkland that they could not do if the sludge were contaminated.

Tools of the Trade… Above photos**,** the Refrigerated Automatic Sampler will have a Data programmer which will allow you to set the time to collect the sample or samples. This machine can also measure the amount of the sample.

These can also be used for the collection of composite samples. Sometimes you will see a pH probe with real-time reads sent to the Operator's Command Center. A common site on most wastewater plants and SIUs.

One big disappointment, expect sampler failures. Dead batteries, wrong sample times and over and under filling the sampler is common.

Care must be taken when setting up a new sampler. Programming, leveling, calibration, and power supply should be double checked to insure accurate sampling.

One big disappointment, expect sampler failures. Dead batteries, wrong sample times and over and under filling the sampler is common.

Volatile Organic Compounds (VOCs)

One more important issues we need to address before we cover the essential of a pretreatment program is volatile organics. Volatile organics discharged to sewers can accumulate in the headspace of sewers, increasing the likelihood of explosions that can cause significant damage. Probably the most well-known impact from industrial discharges to POTWs in the U.S. is the explosion in Louisville, KY that occurred in 1981 as the result of excessive discharges of hexane into the collection system, eventually igniting and destroying more than 3 miles of sewers and causing $20 million in damage. Discharge limitations and management practices to control slug discharges have significantly reduced the likelihood of future catastrophes such as the explosion in Louisville.

Discharges of toxic organics can also result in the release of poisonous gas. This occurs most often when acidic wastes react with other wastes in the discharge. For example, cyanide and acid, both present in many electroplating operations, react to form highly toxic hydrogen cyanide gas. Similarly, sulfides from leather tanning can combine with acid to form hydrogen sulfide, another toxic gas. These can be highly dangerous to POTW collection system operators exposed to such conditions in the performance of their duties.

Other problems associated with toxic discharges were summarized in Figure 3 and further document the urgency of keeping toxics out of collection systems and POTWs.

The National Pretreatment Program is charged with controlling the 129 Priority Pollutants from industries that discharge into sewer systems as described in the CWA (see Figure 4).

These pollutants fall into two categories; metals and organics:

- Metals, including lead, mercury, chromium, and cadmium that cannot be destroyed or broken down through treatment or environmental degradation. Toxic metals can cause different human health problems such as lead poisoning and cancer. Additionally, consumption of contaminated seafood and agricultural food crops has resulted in exposures exceeding recommended safe levels.

- Toxic organics, including solvents, pesticides, dioxins, and polychlorinated biphenyls (**PCBs**) can be cancer-causing and lead to other serious ailments, such as kidney and liver damage, anemia, and heart failure. In 1996, the EPA's Office of Science and Technology (**OST**) identified 2,193 water bodies with fish and wildlife advisories, up more than 25 percent from 1995.

Reductions in pollutants can ensure that industrial development vital to the economic well-being of a community is compatible with a healthy environment.

Many POTWs are responsible for ensuring that industrial and commercial facilities do not cause problems resulting from their discharges. In 1991, the EPA estimated that 190 to 204 million pounds of metals and 30 to 108 million pounds of organics were removed each year as a result of pretreatment program requirements.

This is substantiated by many POTWs that report significant reductions in the loadings of toxics to their treatment plants that is directly attributable to implementation of the National Pretreatment Program.

Appendix A to 40 CFR, Part 423--126 Priority Pollutants

001 Acenaphthene
002 Acrolein
003 Acrylonitrile
004 Benzene
005 Benzidine
006 Carbon tetrachloride (tetrachloromethane)
007 Chlorobenzene
008 1,2,4-trichlorobenzene
009 Hexachlorobenzene
010 1,2-dichloroethane
011 1,1,1-trichloreothane
012 Hexachloroethane
013 1,1-dichloroethane
014 1,1,2-trichloroethane
015 1,1,2,2-tetrachloroethane
016 Chloroethane
018 Bis(2-chloroethyl) ether
019 2-chloroethyl vinyl ether (mixed)
020 2-chloronaphthalene
021 2,4, 6-trichlorophenol
022 Parachlorometa cresol
023 Chloroform (trichloromethane)
024 2-chlorophenol
025 1,2-dichlorobenzene
026 1,3-dichlorobenzene
027 1,4-dichlorobenzene
028 3,3-dichlorobenzidine
029 1,1-dichloroethylene
030 1,2-trans-dichloroethylene
031 2,4-dichlorophenol
032 1,2-dichloropropane
033 1,2-dichloropropylene (1,3-dichloropropene)
034 2,4-dimethylphenol
035 2,4-dinitrotoluene
036 2,6-dinitrotoluene
037 1,2-diphenylhydrazine
038 Ethylbenzene
039 Fluoranthene
040 4-chlorophenyl phenyl ether
041 4-bromophenyl phenyl ether
042 Bis(2-chloroisopropyl) ether
043 Bis(2-chloroethoxy) methane
044 Methylene chloride (dichloromethane)
045 Methyl chloride (dichloromethane)
046 Methyl bromide (bromomethane)
047 Bromoform (tribromomethane)
048 Dichlorobromomethane
051 Chlorodibromomethane
052 Hexachlorobutadiene
053 Hexachloromyclopentadiene
054 Isophorone
055 Naphthalene
056 Nitrobenzene
057 2-nitrophenol
058 4-nitrophenol
059 2,4-dinitrophenol
060 4,6-dinitro-o-cresol
061 N-nitrosodimethylamine
062 N-nitrosodiphenylamine
063 N-nitrosodi-n-propylamin
064 Pentachlorophenol
065 Phenol
066 Bis(2-ethylhexyl) phthalate
067 Butyl benzyl phthalate
068 Di-N-Butyl Phthalate
069 Di-n-octyl phthalate
070 Diethyl Phthalate
071 Dimethyl phthalate
072 1,2-benzanthracene (benzo(a) anthracene
073 Benzo(a)pyrene (3,4-benzo-pyrene)
074 3,4-Benzofluoranthene (benzo(b) fluoranthene)
075 11,12-benzofluoranthene (benzo(b) fluoranthene)
076 Chrysene
077 Acenaphthylene
078 Anthracene
079 1,12-benzoperylene (benzo(ghi) perylene)
080 Fluorene
081 Phenanthrene
082 1,2,5,6-dibenzanthracene (dibenzo(,h) anthracene)
083 Indeno (,1,2,3-cd) pyrene (2,3-o-pheynylene pyrene)
084 Pyrene
085 Tetrachloroethylene
086 Toluene
087 Trichloroethylene
088 Vinyl chloride (chloroethylene)
089 Aldrin
090 Dieldrin
091 Chlordane (technical mixture and metabolites)
092 4,4-DDT
093 4,4-DDE (p,p-DDX)
094 4,4-DDD (p,p-TDE)
095 Alpha-endosulfan
096 Beta-endosulfan
097 Endosulfan sulfate
098 Endrin
099 Endrin aldehyde
100 Heptachlor
101 Heptachlor epoxide (BHC-hexachlorocyclohexane)
102 Alpha-BHC
103 Beta-BHC
104 Gamma-BHC (lindane)
105 Delta-BHC (PCB-polychlorinated biphenyls)
106 PCB-1242 (Arochlor 1242)
107 PCB-1254 (Arochlor 1254)
108 PCB-1221 (Arochlor 1221)
109 PCB-1232 (Arochlor 1232)
110 PCB-1248 (Arochlor 1248)
111 PCB-1260 (Arochlor 1260)
112 PCB-1016 (Arochlor 1016)
113 Toxaphene
114 Antimony
115 Arsenic
116 Asbestos
117 Beryllium
118 Cadmium
119 Chromium
120 Copper
121 Cyanide, Total
122 Lead
123 Mercury
124 Nickel
125 Selenium
126 Silver
127 Thallium
126 Silver
128 Zinc
129 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD)

General Pretreatment Regulations at 40 CFR Part 403§ 403.1 Purpose and Applicability *(Credit USEPA)*

Figure 6. The General Pretreatment Regulations

§ 403.2 Objectives of general pretreatment regulations
§ 403.3 Definitions
§ 403.4 State or local law
§ 403.5 National pretreatment standards: Prohibited discharges
§ 403.6 National pretreatment standards: Categorical pretreatment standards
§ 403.7 Removal credits
§ 403.8 Pretreatment program requirements: Development and implementation by POTW
§ 403.9 POTW pretreatment programs and/or authorization to revise pretreatment standards: Submission for approval
§ 403.10 Development and submission of NPDES State pretreatment programs
§ 403.11 Approval procedures for POTW pretreatment programs and POTW granting of removal credits
§ 403.12 Reporting requirements for POTW's and industrial users
§ 403.13 Variances from categorical pretreatment standards for fundamentally different factors
§ 403.14 Confidentiality
§ 403.15 Net/Gross calculation
§ 403.16 Upset provision
§ 403.17 Bypass
§ 403.18 Modification of POTW pretreatment programs
Appendix A: Program Guidance Memorandum
Appendix B: [Reserved]
Appendix C: [Reserved]
Appendix D: Selected Industrial Subcategories Considered Dilute for Purposes of the Combined Wastestream Formula
Appendix E: Sampling Procedures
Appendix F: [Reserved]
Appendix G: Pollutants Eligible for a Removal Credit

The General Pretreatment Regulations

1. The General Pretreatment Regulations establish responsibilities of Federal, State, and local government, industry and the public to implement Pretreatment Standards to control pollutants which pass through or interfere with POTW treatment processes or which may contaminate sewage sludge. The regulations, which have been revised numerous times since originally published in 1978, consist of 18 sections and several appendices.

2. The General Pretreatment Regulations apply to all non-domestic sources which introduce pollutants into a POTW. These sources of "***indirect discharge***" are more commonly referred to as industrial users (**IUs**).

3. Since IUs can be as simple as an unmanned coin operated car wash to as complex as an automobile manufacturing plant or a synthetic organic chemical producer, EPA developed four criteria that define a Significant Industrial User (**SIU**). Many of the General Pretreatment Regulations apply to SIUs as opposed to IUs, based on the fact that control of SIUs should provide adequate protection of the POTW.

These four criteria are as follows:

- An IU that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW;
- An IU that contributes a process wastestream making up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant;
- An IU designated by the Control Authority as such because of its reasonable potential to adversely affect the POTW's operation or violate any pretreatment standard or requirement; or
- An IU subject to Federal categorical pretreatment standards.

Unlike other environmental programs that rely on Federal or State governments to implement and enforce specific requirements, the Pretreatment Program places the majority of the responsibility on local municipalities. Specifically, section 403.8(a) of the General Pretreatment Regulations states that any POTW (or combination of treatment plants operated by the same authority) with a total design flow greater than 5 million gallons per day (MGD) and smaller POTWs with SIUs must establish a local pretreatment program.

As of early 1998, 1,578 POTWs are required to have local programs. While this represents only about 15 percent of the total treatment plants nationwide, these POTWs account for more than 80 percent (i.e., approximately 30 billion gallons a day) of the national wastewater flow.

Control Authority

The General Pretreatment Regulations define the term “Control Authority” as a POTW that administers an approved pretreatment program since it is the entity authorized to control discharges to its system.

Section 403.10(e) provides States authority to implement POTW pretreatment programs in lieu of POTWs. Five States have elected to assume this responsibility (Vermont, Connecticut, Alabama, Mississippi, and Nebraska). In these instances, the State is defined as the Control Authority. As described above, all Control Authorities must establish a local pretreatment program to control discharges from non-domestic sources.

Approval Authority

These programs must be approved by the “Approval Authority” who is also responsible for overseeing implementation and enforcement of these programs.

As of 6/2020, a total of 47 States /Territories are authorized to implement State NPDES Permit Programs, but only 37 are authorized to be the Pretreatment Program Approval Authority. In all other States and Territories (including the 403.10(e) States), the EPA is considered to be the Approval Authority.

POTW Pretreatment Program Requirements

The actual requirement for a POTW to develop and implement a local pretreatment program is a condition of its NPDES permit. Once the Approval Authority determines that a POTW needs a pretreatment program, the POTW's NPDES permit is modified to require development of a local program and submission of the program to the Approval Authority for review and approval. Consistent with §403.8(f), POTW pretreatment programs must contain the six minimum elements.

In addition to the six specific elements, pretreatment program submissions must include:

- a statement from the City Solicitor (or the like) declaring the POTW has adequate authority to carry out program requirements;
- copies of statutes, ordinances, regulations, agreements, or other authorities the POTW relies upon to administer the pretreatment program including a statement reflecting the endorsement or approval of the bodies responsible for supervising and/or funding the program;
- a brief description and organizational chart of the organization administering the program; and
- a description of funding levels and manpower available to implement the program.

Pretreatment program submissions found to be complete proceed to the public notice process, Public Participation and POTW Reporting. Upon program approval, the Approval Authority is responsible for modifying the POTW's NPDES permit to require implementation of the approved pretreatment program. Once approved, the Approval Authority oversees POTW pretreatment program implementation via receiving annual reports and conducting periodic audits and inspections.

As of early 1998, of the 1,578 POTWs required to develop pretreatment programs, 97 percent (1,535) have been approved. The National Pretreatment Program regulates IUs through three types of regulatory entities: the EPA, Approval Authorities, and Control Authorities. As noted above, Approval Authorities oversee Control Authorities while Control Authorities regulate IUs.

Using an extension pole with a sampling attachment to grab a sample.

Six Minimum Pretreatment Program Elements

1. Legal Authority
The POTW must operate pursuant to legal authority enforceable in Federal, State or local courts, which authorizes or enables the POTW to apply and enforce any pretreatment regulations developed pursuant to the CWA. At a minimum, the legal authority must enable the POTW to:

I. deny or condition discharges to the POTW;
ii. require compliance with pretreatment standards and requirements;
iii. control IU discharges through permits, orders, or similar means;
iv. require IU compliance schedules when necessary to meet applicable pretreatment standards and/or requirements and the submission of reports to demonstrate compliance;
v. inspect and monitor IUs;
vi. obtain remedies for IU noncompliance; and
vii. comply with confidentiality requirements.

2. Procedures
The POTW must develop and implement procedures to ensure compliance with pretreatment requirements, including:

I. identify and locate all IUs subject to the pretreatment program;
ii. identify the character and volume of pollutants contributed by such users;
iii. notify users of applicable pretreatment standards and requirements;
iv. receive and analyze reports from IUs;
v. sample and analyze IU discharges and evaluate the need for IU slug control plans;
vi. investigate instances of noncompliance; and
vii. comply with public participation requirements.

3. Funding
The POTW must have sufficient resources and qualified personnel to carry out the authorities and procedures specified in its approved pretreatment program.

4. Local limits
The POTW must develop local limits or demonstrate why these limits are not necessary.

5. Enforcement Response Plan (ERP)
The POTW must develop and implement an ERP that contains detailed procedures indicating how the POTW will investigate and respond to instances of IU noncompliance.

6. List of SIUs
The POTW must prepare, update, and submit to the Approval Authority a list of all Significant Industrial Users (**SIUs**).

Pretreatment Roles and Responsibilities

EPA Headquarters

< Oversees program implementation at all levels
< Develops and modifies regulations for the program
< Develops policies to clarify and further define the program
< Develops technical guidance for program implementation
< Initiates enforcement actions as appropriate

Regions

< Fulfill Approval Authority responsibilities for States without a State pretreatment program
< Oversee State program implementation
< Initiate enforcement actions as appropriate.

Approval Authorities (EPA Regions and delegated States)

< Notify POTWs of their responsibilities
< Review and approve requests for POTW pretreatment program approval or modification
< Review requests for site-specific modifications to categorical pretreatment standards
< Oversee POTW program implementation
< Provide technical guidance to POTWs
< Initiate enforcement actions, against noncompliant POTWs or industries.

Control Authorities (POTWs, States, or EPA Regions)

< Develop, implement, and maintain approved pretreatment program
< Evaluate compliance of regulated IUs
< Initiate enforcement action against industries as appropriate
< Submit reports to Approval Authorities
< Develop local limits (or demonstrate why they are not needed)
< Develop and implement enforcement response plan.

Industrial Users

< Comply with applicable pretreatment standards and reporting requirements.

(Credit USEPA)

What Types of Businesses are Subject to Pretreatment Regulations?

Pretreatment regulations apply to a variety of businesses discharging wastewater from industrial and commercial processes.

Certain types of industries with the potential to discharge pollutants are regulated through an industrial discharge permit system. Industries are considered

Significant Industrial Users and therefore require a discharge permit if the user:

- Is subject to the Environmental Protection Agency's Categorical Pretreatment Standards. Categorical users receive increased scrutiny due to their potential to pollute. Examples of categorical users are metal finishers and pharmaceutical manufacturers.
- Is discharging an average of 25,000 gallons per day or more of process wastewater.
- Has the potential to adversely affect the wastewater utility.

Industry-Specific Guides
Aluminum, Copper, And Nonferrous Metals Forming And Metal Powders

- Pretreatment Standards: A Guidance Manual
- Guidance Manual For Battery Manufacturing Pretreatment Standards
- Guidance Manual for Electroplating and Metal Finishing Pretreatment Standard
- Guidance Manual For Iron And Steel Manufacturing Pretreatment Standards
- Guidance Manual for Leather Tanning and Finishing Pretreatment Standards
- Guidance Manual for Pulp, Paper, Paperboard, Builders' Paper, and
- Board Mills Pretreatment Standards

Pretreatment Standards

The National Pretreatment Program identifies specific requirements that apply to all IUs, additional requirements that apply to all SIUs, and certain requirements that only apply to CIUs. The objectives of the National Pretreatment Program are achieved by applying and enforcing three types of discharge standards:

< prohibited discharge standards
< categorical standards
< local limits.

POTW Pretreatment Program Responsibilities

This section provides an overview of these POTW programs, highlighting each of the specific program areas that are to be addressed.

Legal Authority *(Credit USEPA)*

POTWs seeking pretreatment program approval must develop policy and procedures for program implementation and establish the legal authority to implement and enforce program requirements. The General Pretreatment Regulations do not provide Control Authorities with the legal authority to carry out their pretreatment programs; rather, the regulations set forth the minimum requirements for POTWs with pretreatment programs.

A Control Authority's legal authority actually derives from State law. Therefore, State law must confer the minimum Federal legal authority requirements on a Control Authority. Where deficient, State law must be modified to grant the minimum requirements. In order to apply regulatory authority provided by State law, it is generally necessary for the Control Authority to establish local regulations to legally implement and enforce pretreatment requirements. Where the Control Authority is a municipality, legal authority is detailed in a Sewer Use Ordinance (SUO), which is usually part of city or county code.

Regional Control Authorities frequently adopt similar provisions in the form of "**rules and regulations**." Likewise, State agencies implementing a Statewide program under 40 CFR §403.10(e) set out pretreatment requirements as State regulations, rather than as an SUO. **[Local regulations cannot give the Control Authority greater authority than that provided by State law.]**

The EPA's 1992 guidance, *EPA Model Pretreatment Ordinance* provides a model for POTWs that are required to develop pretreatment programs. As POTW service areas expand, new contributions may arise from "**extra jurisdictional**" IUs located outside of the Control Authority's legal jurisdiction (see Figure 22). Multijurisdictional arrangements require special legal/contractual mechanisms to ensure adequate authority to implement and enforce program requirements in these other jurisdictions. Some state statutes may provide for general extraterritorial powers (i.e., a Control Authority is automatically allowed to regulate extra jurisdictional IUs contributing to their system).

However, the extent to which authorities (i.e., to permit, inspect, enforce, monitor, etc.) are granted may be somewhat limited, thereby, restricting a Control Authority's ability to implement and enforce a program. Where obtaining authority from the State to regulate extra jurisdictional IUs is not feasible, other options may be pursued:

Districts The creation of an independent organization (by affected municipalities or the State) which is authorized to administer and enforce an approved pretreatment program for the entire area in which it provides services is common in areas where multiple POTWs each serve various jurisdictions.

Agreements Affected Control Authorities may opt to enter into agreements requiring each municipality to implement and enforce the approved pretreatment program covering all IUs within their jurisdiction. The Control Authority must retain the means to regulate extra jurisdictional IUs where the contributing jurisdiction's efforts are inadequate. It is essential that agreements clearly define the roles of each party.

Annexation Where extra jurisdictional IUs lie in unincorporated areas, a Control Authority may annex or utility annex the service area.

Contracts
A Control Authority may enter into a contract with an extra jurisdictional IU, although contracts generally limit the enforcement capabilities of the Control Authority. As such, contracts should only be pursued when all other means fail. Since procedures for obtaining jurisdiction, creating sanitary districts, annexing service areas, etc. vary among states, Control Authority personnel should consult with their legal staff to thoroughly examine options allowed. This may include requesting State legislative changes if necessary. The EPA's 1994 *Multijurisdictional Pretreatment Programs - Guidance Manual* provides more information on these jurisdictional issues, including sample language for agreements and contracts.

Industrial Waste Surveys
As part of program development and maintenance, the Federal regulations [40 CFR §403.8(f)(2)(I)] require Control Authorities to identify and locate all IUs that might be subject to the pretreatment program. While the General Pretreatment Regulations do not specify how a Control Authority is to accomplish this, it is beneficial to conduct an initial in-depth survey, and then institute measures to update the list continuously.

Control Authorities must ensure that the entire service area is reviewed. This may include IUs located outside the jurisdictional boundaries of the POTW. In these instances, it may be appropriate to solicit assistance from other jurisdictions in developing the list of potential dischargers. The types of resources that may be consulted in compiling and updating the master list include:

- Water and sewer billing records
- Applications for sewer service
- Local telephone directories
- Chamber of Commerce and local business directories
- Business license records
- POTW and wastewater collection personnel and field observations
- Business associations
- Internet

Once IUs are identified, the Control Authority must classify these users to determine if pretreatment standards and requirements should apply to these facilities. Typically, the Control Authority develops and distributes an Industrial Waste Survey (IWS) questionnaire to the identified IUs. The IWS questionnaire requests information regarding IU activities and the nature of wastes discharged.

The Control Authority may opt to send a detailed IWS questionnaire initially or conduct the survey in two phases (i.e., send a screener requesting basic information to eliminate obvious facilities and then send a detailed IWS to those facilities with greater potential to be SIUs). Key to the IWS is to identify facilities that are subject to categorical standards (i.e., CIUs) or otherwise have the potential to impact the POTW (i.e., SIUs). A POTW's IU inventory should include the name, location, classification, applicable standards, basis for limits imposed, and volume of discharge, control mechanism status, compliance dates and other special requirements for each IU.

The IWS should provide most of the information required to develop the inventory, although some supplementary information might be required from other sources, such as the permit application or monitoring data. The IU inventory must be updated as needed [40 CFR §403.8(f)(2)(I)] and provided to the Approval Authority as part of the annual report requirement (see POTW Reports section in this Chapter). The ongoing task of maintaining a complete list of IUs requires the Control Authority to implement a system to track existing IU information and/or classification changes and new user information. Some Control Authorities may proactively opt to institute a "utility connect questionnaire" program. These types of forms are completed when a customer applies for new utility service (e.g., water, sewerage, or electricity).

Permitting *(Credit USEPA)*

The General Pretreatment Regulations require all IUs be controlled through permit, order, or similar means to ensure compliance with applicable pretreatment standards and requirements. Section 403.8(f)(1)(iii)(A-E) clarifies this requirement to specify that all SIUs be issued a permit or equivalent individual control mechanism which contains, at a minimum:

- Statement of duration (not to exceed five years);
- Statement of nontransferabililty (unless outlined provisions are met);
- Effluent limitations based on applicable standards;
- Self-monitoring, sampling, reporting, notification, and record-keeping requirements;
- Statement of applicable civil and criminal penalties; and a schedule of compliance (where appropriate).

The EPA's 1989 *Industrial User Permitting Guidance Manual* details procedures for drafting IU discharge permits. SIU permits issued are site specific and tailored to the unique circumstances of the IU. Permit conditions must establish clear and explicit requirements for the permittee, to include using such terms such as "shall" and "must" in lieu of vague terms such as "recommend" or "may". The Control Authority must document its decision-making process when developing permits to ensure defensibility and enforceability. Adherence to sound, documented procedures will prevent any arbitrary and capricious claims by the permittee.

Whether developing or reissuing a permit, the permitting process consists of three phases:
Phase I - Collection and verification of information
Phase II - Data interpretation and fact sheet development
Phase III - Permit development and issuance.

Phase I
As part of Phase I, Control Authorities may review and verify information contained in the permit application, perform an inspection of the IU for confirmation of facts, tally data, and potentially sample and analyze the IU's wastestream. Knowledgeable Control Authority personnel, effective communication, and SIU cooperation are essential to collection of complete and accurate information.

Phase II requires that the Control Authority interpret data and other information and document the permit decision-making rationale, preferably in a permit fact sheet. Although the contents of a fact sheet will vary by permittee, fact sheets should provide a justification of all permitting decisions.

Typical components of a fact sheet are provided. Completed fact sheets should be included as part of the permit and provided to the Permittee to document the soundness of permitting decisions. For CIUs:

Components of Permit Fact Sheet

- the basis for the categorical determination(s)
- the identity and flow volume of all wastestreams generated and discharged to the POTW, and classified accordingly (i.e., regulated, unregulated, or dilution)
- data used and/or justification for estimates used to determine categorical limitations
- basis for limits imposed for categorical parameters.

For SIUs/CIUs:

- basis for limits imposed for non-categorical parameters
- rationale for compliance schedules, special plans required, special conditions, etc.
- basis for monitoring and reporting frequencies.

Inspection Considerations *(Credit USEPA)*

- Provide current data on IUs
- Confirm or determine IUs' compliance status
- Determine completeness and accuracy of the IU's performance/compliance records
- Assess the adequacy of the IU's self-monitoring and reporting requirements
- Assess the adequacy of monitoring locations and IU's sampling techniques
- Assess the adequacy of imposed limitations and pollutants of concern
- Develop rapport with IUs
- Evaluate operation and maintenance and overall performance of an IU's pretreatment system
- Assess the potential for spills and slug loadings
- Evaluate the effectiveness of slug control plan
- Reveal issues requiring action
- Identify noncompliance needing resolution
- Suggest pollution prevention opportunities
- Collect samples
- Obtain data to support enforcement actions

After all permitting decisions are made; the Control Authority must incorporate those decisions into a permit. The permit, signed by the specified Control Authority official, is provided to the Permittee for comment and after comments are addressed, a final permit is issued to the IU. While many comments may be easily addressed/resolved by the Control Authority, occasionally resolution must be obtained through a formal adjudicatory hearing process where both the Permittee and Control Authority present their case to a third party.

Non-SIUs

Many POTWs also control contributions from non-SIUs using various means, such as through general permits issued to an entire industrial sector. These types of control mechanisms may not necessarily require compliance with specific pollutant limitations.

Permit Application *(Credit USEPA)*

All industrial users that require a permit must be sampled to determine the characteristics of the wastes to be discharged into the POTW's sewer system. Prior to the issuance of a permit for existing industrial users, the POTW's Inspector or Water Quality Department/Pollution Control Division samples the user's effluent, and performs the analyses required by the applicable discharge standards (i.e., Categorical standards or local limits).

For new industrial users, estimates of the wastes to be discharged into the POTW's sewer system must be submitted along with the permit application. No sampling would be performed at these new facilities, since they do not presently discharge wastes into the sewer system. Existing industrial users who are not yet permitted are required to conduct a sampling program as part of the permitting process.

A four-day sampling program is usually conducted at each site to collect both composite and grab (for pollutants not amenable to composite sampling) samples as needed.

Industrial Sector
Industrial sector general permitting programs are common where a real or potential POTW problem is linked to a particular pollutant discharged (e.g., collection system blockages caused by the discharge of excess oils and grease from food establishments). POTWs have authority to enforce their SUO or rules or regulations against non-SIUs without the need for any type of individual control mechanism. Control Authorities have the authority to require non-SIUs to comply with pretreatment standards and requirements contained in their local regulations and then take appropriate actions against IUs as noncompliance is identified.

Inspections
Control Authorities are required to inspect and sample all SIUs a minimum of once per year pursuant to 40 CFR §403.8(f)(2(v). The frequency with which a Control Authority actually inspects an SIU may vary depending on issues such as the variability of an SIU's effluent, the impact of their discharge on the POTW, and their compliance history. Inspection considerations (see Figure 24) will hinge upon the type of inspection performed (i.e., scheduled, unscheduled or demand).

The EPA's 2017 *Industrial User Inspection and Sampling Manual for POTWs* provides a detailed reference for inspection procedures and protocols. Scheduled inspections are useful when the Control Authority wants to gather specific information from the facility that necessitates meeting with specific SIU contacts. However, since scheduled inspections may interrupt normal operations (e.g., altered production schedule as a result of preparative work undertaken by the IU), unscheduled inspections may more accurately reflect IU compliance status when the inspection is performed for that reason.

POTWs must evaluate, at least once every two years, whether each SIU needs a plan to control slug discharges (i.e., a discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch discharge). To accurately evaluate the slug potential, Control Authorities likely will have to examine the SIU during normal operating conditions. If undetected, slug discharges can have serious impacts on the POTW.

The EPA's 1991 *Control of Slug Loadings to POTWs Guidance Manual* provides a description of procedures for development, implementation, and review of slug control plans.

Demand inspections are non-routine in nature and occur in response to a concern (e.g., POTW collection problems downstream from an IU, elevated enforcement actions against an IU, suspicious IU behavior, or an informer complaint).

Routine Control Authority inspections of SIUs typically consist of three activities; preparation, on-site assessment, and follow-up.

PRETREATMENT

The term **"pretreatment"** means the treatment of wastewater by commercial and industrial facilities to remove harmful pollutants before being discharged to a sewer system under the control of a publicly owned treatment works (POTWs). "Pretreatment" is also defined in **Title 40 Code of Federal Regulations (40 CFR) Subsection 403.**

Technical Learning College

Preparation *(Credit USEPA)*

Control Authority personnel should review POTW records for SIUs to be inspected to familiarize themselves with the facility. Information reviewed may include compliance status, compliance schedule activities, reports and plans, upcoming report and plan due dates, enforcement activities, permit applications, waste surveys, previous inspection summaries, categorical regulations, water use/billing records, and POTW collection system maps.

Control Authority personnel should also be familiar with any specific issues and concerns regarding the POTW treatment plant or collection system problems receiving the SIU's discharge.

On-site Assessment
Control Authority personnel typically discuss IU operations with IU contacts and perform a walkthrough of the facility to: update IU information regarding contacts, processes, production rates, pretreatment, and other waste management activities; review records required to be kept by the IU; visually verify the need for a slug control plan; and review pretreatment system maintenance, categorical standards applicable to processes employed, metering and sampling equipment, sampling procedures, chemicals used, processes employed, management practices, containment structures, locations of floor drains, etc. Many POTWs have developed a standard inspection questionnaire to facilitate the interview process and promote consistency during the inspection.

Follow-up
An inspection report should be prepared as soon as possible after the inspector returns to the office. Unanswered questions, required permit modifications, and/or necessary enforcement actions should be processed in a timely manner. Non-routine inspections (e.g., demand) may not encompass all the activities and steps specified above, but, like routine inspections, these activities may provide the Control Authority an opportunity to collect samples of the IU's discharge.

Sewer System Evaluation *(Credit USEPA)*

On a regular basis, selected locations in the sewer system are sampled to develop background data for purposes of updating the local limits, and to screen areas for higher than "background" pollutant levels. In addition, problem areas are sampled on an as needed basis to determine potential sources of Code violations that either occur on a frequent basis, or are the result of a slug load to the sewer system.

To monitor sewers for background information, the sampling program would typically be conducted over a four-day period. In instances where the intent is to determine sources of pollutants and/or slug loads, the length of the program would vary.

Multi-City Users (Metering Stations) Example
All wastewater, which is transported to the POTW Treatment Plant from the Multi-City users, must be analyzed for pollutants of concern to the Industrial Pretreatment Program.

This type of sampling program is usually conducted over a seven-day period to obtain four-seven days of sampling data at each sewer location (i.e., a metering station) on a quarterly basis.

Once the sampling dates have been determined, the Inspector will notify, in writing, the Sub-regional Organizational Group (**SROG**) representative for that City of the dates when the sampling will be conducted.

Upon arrival at the site, safety is the priority. A visual inspection must be completed prior to any entry. The site must be free of any obstructions or hazards which may cause injury when entering the sampling area. If there are any problems detected, the SROG representative and the Inspector should be notified, and no entry should be attempted until the problem has been corrected.

Metering stations qualify as confined spaces (Example Policy)
If all safety criteria have been met, prepare equipment for the site. Check the assignment sheet to determine what parameters are required to be sampled, which in turn determines the type of tubing to be used (i.e. Tygon or Teflon).

The sampler must be completely assembled before performing QA/QC procedures. After QA/QC is complete, a sufficient amount of weight must be attached to the tubing to keep the strainer submerged in the effluent for proper siphoning of the sample, without allowing the strainer to hit the bottom of the flume. Make sure the intake tubing does not kink.

If the metering station has a flow meter, you may connect either their cable or a POTW cable to the sampler from the flow meter. Occasionally, you will set up a flow meter to have a comparison reading. Determine the pulse rate and proper setting from the flow, and program the sampler. After entering the data into the sampler, wait to make sure the equipment is pulling samples.

After the initial set-up of the sampling equipment, samples will be collected during the remainder of the sampling period. Split samples may be requested by the SROG representative. If the volume of the sample is adequate, these may be given, provided the representative supplies the containers and allows the City Inspector to pour off the samples.

No grab samples will be collected by POTW Inspectors for any SROG representatives. (Example Policy)
Upon exiting the confined space, continue to follow the confined space entry procedures as outlined by OSHA Standards. When you return to the sampling vehicle, you must immediately perform field tests and preserve the samples according to the techniques set forth in by Standard Methods or the State/Federal Rule.

All paper work must be filled out completely before the sampling crew's departure. This paperwork includes the chain of custody which is turned in to the laboratory with the samples, "Metering Station Field Observation Form" that remains with the sampling site file, and the Multi-City Metering Station Sample Record, of which the original is given to the Inspector and the copy is given to the SROG representative.

If there is not an SROG representative at the site, these copies will be turned over to the Inspector with the originals at the end of the week. Remember, all paperwork must be completed prior to leaving the site.

Compliance Monitoring
There are two types of sampling activities that are performed as part of compliance monitoring for permitted industries: unscheduled and demand.

Unscheduled sampling is used to determine the compliance status of the user. Instances of noncompliance are often identified during unannounced monitoring visits. No notice is given for this type of sampling. This type of sampling is performed two to four times a year, at each industrial user site, over a two to five-day period to obtain sampling data

Demand sampling is usually initiated in response to a known or suspected violation, discovered as a result of a self-monitoring report, routine sampling visit, public complaint, unusual influent condition at the wastewater treatment plant, or emergency situations (e.g., plant upsets, sewer line blockages, fires, explosions, etc.). Most often, this type of sampling is conducted to support enforcement actions against an industrial user. This type of sampling activity is performed on an as needed basis.

The length of the sampling program depends on the flow, nature of the wastes, and type of samples (i.e., grab or composite) to be collected.

Typically, composite and grab samples are collected at each user site.

Nonpermitted Industrial Users (User Rate Charge Program) (Example Policy)
On a periodic basis (i.e., once every two to three years), commercial and minor industrial users are sampled to determine discharge concentrations of various pollutants. Typical types of users which may be sampled include: restaurants, photo processing laboratories, laundries, car washes, and printing shops.

A three- to four-day sampling program is usually conducted at each assigned site. Commercial establishments are sampled to establish BOD and SS levels for various groups of users for the Finance/ Utilities department.

This activity is also helpful in identifying industrial or commercial users which may discharge pollutants of concern.

Prohibited Discharge Standards *(Credit USEPA)*

All IUs, whether or not subject to any other National, State, or local pretreatment requirements, are subject to the general and specific prohibitions identified in 40 CFR §§403.5(a) and (b), respectively. General prohibitions forbid the discharge of any pollutant(s) to a POTW that cause pass through or interference (Figure 10). Specific prohibitions forbid eight categories of pollutant discharges as follows:

(1) discharges containing pollutants which create a fire or explosion hazard in the POTW, including but not limited to, wastestreams with a closed cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 CFR §261.21;

(2) discharges containing pollutants causing corrosive structural damage to the POTW, but in no case discharges with a pH lower than 5.0, unless the POTW is specifically designed to accommodate such discharges;

(3) discharges containing pollutants in amounts causing obstruction to the flow in the POTW resulting in interference;

(4) discharges of any pollutants released at a flow rate and/or concentration which will cause interference with the POTW;

(5) discharges of heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40°C (104°F) unless the Approval Authority, upon request of the POTW, approves alternative temperature limits;

(6) discharges of petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(7) discharges which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems; and

(8) discharges of trucked or hauled pollutants, except at discharge points designated by the POTW.

Compliance with the general and specific prohibitions is mandatory for all IUs, although a facility may have an affirmative defense in any action brought against it alleging a violation of the general prohibitions or of certain specific prohibitions [(3), (4), (5), (6) and (7) above] where the IU can demonstrate it did not have reason to know that its discharge, alone or in conjunction with a discharge or discharges from other sources, would cause pass through or interference, and the IU was in compliance with a technically-based local limit developed to prevent pass through or interference.

These prohibited discharge standards are intended to provide general protection for POTWs. However, their lack of specific pollutant limitations creates the need for additional controls, namely categorical pretreatment standards and local limits.

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Categorical Pretreatment Standards *(Credit USEPA)*

Categorical pretreatment standards (i.e., categorical standards) are national, uniform, technology-based standards that apply to discharges to POTWs from specific industrial categories (i.e., indirect dischargers) and limit the discharge of specific pollutants. Categorical pretreatment standards for both existing and new sources (PSES and PSNS, respectively) are promulgated by the EPA pursuant to Section 307(b) and (c) of the CWA. Limitations developed for indirect discharges are designed to prevent the discharge of pollutants that could pass through, interfere with, or otherwise be incompatible with POTW operations. Effluent limitations guidelines (ELGs), developed in conjunction with categorical standards, limit the discharge from facilities directly to waters of the U.S. (i.e., direct dischargers) and do not apply to indirect dischargers.

ELGs include Best Practicable Control Technology Currently Available (BPT), Best Conventional Pollutant Control Technology (BCT), and Best Available Technology Economically Achievable (BAT) limitations and New Source Performance Standards (NSPS). ELGs (i.e., BPT, BCT, BAT, and NSPS) do not apply to indirect dischargers. The significant difference between categorical standards and effluent limitations guidelines is that categorical standards account for any pollutant removal that may be afforded through treatment at the POTW, while effluent limitations guidelines do not. Industries identified as major sources of toxic pollutants are typically targeted for effluent guideline and categorical standard development.

If limits are deemed necessary, the EPA investigates affected IUs and gathers information regarding process operations as well as treatment and management practices accounting for differences in facility size and age, equipment age, and wastewater characteristics.

Sub categorization within an industrial category is evaluated based on variability in processes employed, raw materials used, types of items produced, and characteristics of wastes generated. Availability and cost of control technologies, non-water quality environmental impacts, available pollution prevention measures, and economic impacts are then identified prior to the EPA's presentation of findings in proposed development documents and publishing a notice of the proposed regulations in the *Federal Registe*r. Based on public comments on the proposed rule, the EPA promulgates (i.e., publishes) the standards.

ATTACHMENT 3-1: SUMMARY OF CATEGORICAL STANDARDS

EPA has established categorical pretreatment standards (for indirect dischargers) for 35 categories. Plans for EPA's expansion and modification of the list are detailed in the *Effluent Guidelines Plan*, published in the *Federal Register* biennially as required at CWA section 304(m). The list of the industrial categories that have categorical pretreatment standards—Pretreatment Standards for Existing Sources (PSES) and Pretreatment Standards for New Sources (PSNS)—as of March 2011 is provided below.

Summary of categorical pretreatment standards

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
1	Aluminum Forming	467	A–F	PSES PSNS	Limits are production-based daily maximums and monthly averages. Subpart C prohibits discharges from certain operations.
2	Battery Manufacturing	461	A–G	PSES PSNS	Limits are production-based daily maximums and monthly averages. No discharge is allowed from any process not specifically identified in the regulations.
3	Carbon Black Manufacturing	458	A–D	PSNS	Limits are for oil and grease only (no duration specified).
4	Centralized Waste Treatment	437	A–D	PSES PSNS	Limits are concentration-based daily maximums and monthly averages.
5	Coil Coating	465	A–D	PSES PSNS	Limits are production-based daily maximums and monthly averages.
6	Concentrated Animal Feeding Operations (CAFO)	412	B	PSNS	Discharge of process wastewater is prohibited, except when there is an overflow resulting from a chronic or catastrophic rainfall event.
7	Copper Forming	468	A	PSES PSNS	Limits are production-based daily maximums and monthly averages.
8	Electrical and Electronic Components	469	A–D	PSES PSNS	Limits are concentration-based daily maximums and 30-day averages or monthly averages (varies per subpart and pollutant parameter). Certification is allowed in lieu of monitoring for certain pollutants when a management plan is approved and implemented.
9	Electroplating	413	A,B,D–H	PSES	Limits are concentration-based (or alternative mass-based equivalents) daily maximums and four-consecutive-monitoring-days averages. Two sets of limits exist, depending on whether facility is discharging more or less than 10,000 gpd of process wastewater. Certification is allowed in lieu of monitoring for certain pollutants when a management plan is approved and implemented.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
10	Fertilizer Manufacturing	418	A–G	PSNS	Limits may specify zero discharge of wastewater pollutants (Subpart A), production-based daily maximums, and 30-day averages (Subparts B–E), or may be concentration-based (Subparts F–G), with no duration of limit specified.
11	Glass Manufacturing	426	H K–M	PSNS	Limits are concentration- or production-based daily maximums and monthly averages.
12	Grain Mills	406	A	PSNS	Discharge of process wastewater is prohibited at a flow rate or mass loading rate (BOD_5 and TSS) that is excessive during periods when a POTW is receiving peak loads.
13	Ink Formulating	447	A	PSNS	Regulations specify no discharge of process wastewater pollutants to a POTW.
14	Inorganic Chemicals Manufacturing	415	A,B,F,L, AH,AJ,AL, AR,AU,BC, BL,BM,BO	PSES	Limits vary for each subpart with a majority of the limits concentration-based, daily maximums, and 30-day averages, or they may specify no discharge of wastewater pollutants.
			B–F, H, K–N,P,Q, T,V,AA, AC,AE,AH AI,AJ,AL, AN,AP,AQ AR,AU,AX BB,BC, BH, BK–BO	PSNS	
15	Iron and Steel Manufacturing	420	A–F, H–J, L	PSES PSNS	Limits are production-based daily maximums and 30-day averages.
16	Leather Tanning and Finishing	425	A–I	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. In certain instances, applicability of pretreatment standards is dictated by volume of production.
17	Metal Finishing	433	A	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. Certification is allowed for certain pollutants where a management plan is approved and implemented.
18	Metal Molding and Casting	464	A–D	PSES PSNS	Limits are primarily production-based daily maximums and monthly averages. Discharges from certain processes are prohibited (Subparts A–C).
19	Nonferrous Metals Forming and Metal Powders	471	A–J	PSES PSNS	Limits are production-based daily maximums and monthly averages. In some instances, the discharge of wastewater pollutants is prohibited.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
20	Nonferrous Metals Manufacturing	421	C,F–M,P, Q,V,X,Y, AA–AC	PSES	Limits are production-based daily maximums and monthly averages. PSES (Subpart F) specify no discharge from existing facilities of process wastewater pollutants to the POTW except for some stormwater events.
			A–Z, AA–AE	PSNS	Limits are production-based daily maximums and monthly averages. PSNS (Subparts D and F) specify no discharge from existing facilities of process wastewater pollutants to the POTW.
21	Oil and Gas Extraction	435	D	PSES PSNS	Regulations specify no discharge of wastes (e.g., produced water, drill cuttings) to a POTW.
22	Organic Chemicals, Plastics, and Synthetic Fibers	414	B–H, K	PSES PSNS	Limits are mass-based (concentration-based standards multiplied by process flow) daily maximums and monthly averages. Standards for metals and cyanide apply only to metal- or cyanide-bearing wastestreams.
23	Paint Formulating	446	A	PSNS	Regulations specify no discharge of process wastewater pollutants to the POTW.
24	Paving and Roofing Materials (Tars and Asphalt)	443	A–D	PSNS	Limits are for oil and grease only (no limit duration specified).
25	Pesticide Chemicals	455	A, C, E	PSES PSNS	Limits are mass-based (concentration-based standards multiplied by process flow) daily maximums and monthly averages. Subpart C specifies no discharge of process wastewater pollutants but provides for pollution-prevention alternatives. Subpart E specifies no discharge of process wastewater pollutants.
26	Petroleum Refining	419	A–E	PSES PSNS	Limits are concentration-based (or mass-based equivalent) daily maximums.
27	Pharmaceutical Manufacturing	439	A–D	PSES PSNS	Limits are concentration-based daily maximums and monthly averages. Such facilities may certify that they do not use or generate cyanide in lieu of performing monitoring to demonstrate compliance.
28	Porcelain Enameling	466	A–D	PSES PSNS	Limits are concentration-based (or alternative production-based) daily maximums and monthly averages. Subpart B prohibits discharges from certain operations.

No.	Category	40 CFR Part	Subparts	Type of standard	Overview of pretreatment standards
29	Pulp, Paper, and Paperboard	430	A–G, I–L	PSES PSNS	Limits are production-based daily maximums and monthly averages. Such facilities may certify that they do not use certain compounds in lieu of performing monitoring to demonstrate compliance. Facilities subject to Subparts B and E must also implement BMPs as identified.
30	Rubber Manufacturing	428	E–K	PSNS	Limits are concentration- or production-based daily maximums and monthly averages.
31	Soap and Detergent Manufacturing	417	O–R	PSNS	Regulations specify no discharge of process wastewater pollutants to a POTW when the wastewater chemical oxygen demand (COD)/BOD_7 ratio exceeds 10.0 and the COD concentrations exceed subcategory specific concentrations.
32	Steam Electric Power Generating	423	—	PSES PSNS	Limits are concentration-based daily maximums, or *maximums for any time*, or compliance may be demonstrated through engineering calculations.
33	Timber Products Processing	429	F–H	PSES PSNS	All PSNS (and PSES for Subpart F) prohibit the discharge of wastewater pollutants. PSES for Subparts G and H are concentration-based daily maximums (with production-based alternatives).
34	Transportation Equipment Cleaning	442	A–C	PSES PSNS	Operators subject to effluent guidelines in subparts A–B must either meet concentration-based daily maximum standards or develop a Pollutant Management Plan. Operators subject to effluent guidelines in subpart C must meet concentration-based daily maximum standards.
35	Waste Combustors	444	A	PSES PSNS	Limits are concentration-based daily maximums and monthly averages.

Definition of New Source (40 CFR 403.3(k)) *(Credit USEPA)*

New Source is defined at 40 CFR §403.3 (k)(1) to mean any building, structure, facility or installation from which there is or may be a discharge of pollutants, the construction of which commenced after publication of proposed Pretreatment Standards under Section 307(c) of the Act which will be applicable to such source if Standards are thereafter promulgated in accordance with that section, *provided that:*
(i) the building, structure, facility, or installation is constructed at a site at which no other source is located; or
(ii) the building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
(iii) the production or wastewater generating processes of the building, structure, facility or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source should be considered.
(2) Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of paragraphs (k)(1)(ii), or (k)(1)(iii) of this section but otherwise alters, replaces, or adds to existing process or production equipment.
(3) Construction of a new source as defined under this paragraph has commenced if the owner or operator has:
(i) begun, or caused to begin as part of a continuous onsite construction program:
(ii) any placement, assembly or installation of facilities or equipment, or
(B) significant site preparation work, including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or
(ii) entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time.
Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

New Source
As noted above, categorical pretreatment standards are developed both for existing (PSES) and new sources (PSNS). Facilities are classified as either PSES or PSNS based on the definition of “new source" set out in 40 CFR§403.3(k) of the General Pretreatment Regulations. Dischargers subject to PSES are required to comply with those standards by a specified date, typically no more than three years after the effective date of the categorical standard. Users subject to PSNS, however, are required to achieve compliance within the shortest feasible time, not to exceed 90 days from commencement of discharge. PSNS are often more stringent than PSES based on the opportunity for new sources to install the best available demonstrated technology and operate the most efficient production processes.

Congress established an initial list of 21 categorical industries under Section 306 of the CWA of 1972. As a result of various court decrees and settlement agreements resulting from litigation, and from the EPA's internal work plan development process, the EPA has developed effluent guidelines (for direct dischargers) and/or categorical pretreatment standards (for indirect dischargers) for 51 industrial categories.

Of these industrial categories, the EPA implements pretreatment standards for 35 categories, and either requires compliance solely with 40 CFR Part 403 General Pretreatment Regulations or does not address pretreatment standards for the remaining categories.

Plans for the EPA's expansion and modification of the list is detailed in the *Effluent Guidelines Plan,* published in the *Federal Register* biennially as required in section 304(m) of the CWA. A list of the industrial categories that have categorical standards is provided as Figure 13. Categorical pretreatment standards developed can be concentration-based or mass-based.

Concentration-based standards are expressed as milligrams of pollutant allowed per liter (mg/l) of wastewater discharged and are issued where production rates for the particular industrial category do not necessarily correlate with pollutant discharges. Mass-based standards are generally expressed on a mass per unit of production (e.g., milligrams of pollutant per kilogram of product produced, pounds of pollutant per million cubic feet of air scrubbed, etc.) and are issued where water conservation is an important component in the limitation development process.

For a few categories where reducing a facility's flow volume does not provide a significant difference in the pollutant load discharged, the EPA has established both mass and concentration-based standards. Generally, both a daily maximum limitation and a long-term average limitation (e.g., average daily values in a calendar month) are established for every regulated pollutant.

Primary Wastewater Treatment Clarifier

CWF vs. FWA

Categorical standards apply to regulated wastewaters, i.e. wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard. Therefore, demonstrating compliance with categorical pretreatment standards is intended to be based on measurements of wastestreams containing only the regulated process wastewater.

However, recognizing isolation of regulated wastestreams from nonregulated wastestreams was not always practicable or desirable, the EPA developed the combined wastestream formula (CWF) and flow weighted average (FWA) approach for determining compliance with combined wastestreams.

Pursuant to 40 CFR §403.6(e), the CWF is applicable where a regulated wastestream combines with one or more unregulated or dilute wastestreams prior to treatment. Where nonregulated wastestreams combine with process streams after pretreatment, the more stringent approach (whether CWF or FWA) is used to adjust the limits.

The CWF and FWA approaches differ primarily in their allowances for nonregulated wastestreams. While the CWF provides a *"full credit"* (i.e., same pollutant levels as regulated wastestreams) for unregulated wastestreams yet no credit for dilute wastestreams, the FWA requires sampling and analysis of the untreated, nonregulated wastestreams to determine the credit to be granted (not to exceed that allowed for the regulated wastestreams).

Application of the CWF and FWA requires proper identification, classification, and quantification of the three wastestream types. Note: in circumstances where boiler blowdown, noncontact cooling water, stormwater, or demineralized wastestreams contain a significant amount of a regulated pollutant, and the treatment of the wastewater with the regulated wastestream results in substantial reduction of the regulated pollutant, the Control Authority can classify the wastestream as unregulated rather than as a dilute wastestream.

Measuring device known as a *"Parshall Flume".*

Several POTW's are requiring the SIU to cover the flume inside the vault to lower the hazard of a permit required confined space.

Summary of Standards

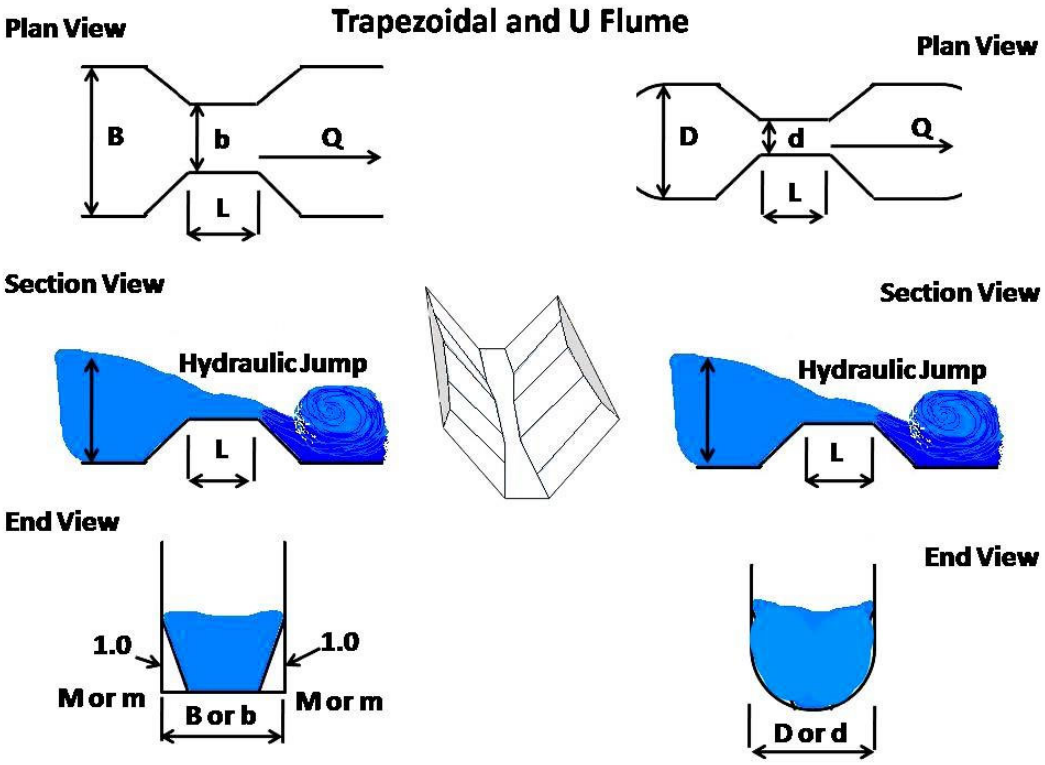
A summary of all of the pretreatment standards, including general and specific prohibitions, categorical pretreatment standards, and local limits.

	General and Specific Prohibitions	Categorical Pretreatment Standards	Local Limits
Development	Established at the Federal level	Established at the Federal level	Developed by Control Authorities
Reference	40 CFR 403.5(a) & (b)	40 CFR Parts 405-471	Requirements for development found in 40 CFR §§403.5(c) & 403.8(f)(4)
Applicability	All IUs	CIUs	Commonly all IUs or all SIUs, but depends on allocation method used when developing limits.
Purpose	Provide for general protection of the POTW. May be superseded by more stringent categorical pretreatment standards or local limits.	Minimum standards based on available treatment technology and pollution prevention measures for controlling non-conventional and toxic pollutants that may cause pass through, interference, etc. at the POTW. May be superseded by more stringent local limits.	Provide site specific protection for a POTW and its receiving waters. May be superseded by more stringent categorical standards.

All standards are considered pretreatment standards for the purpose of section 307(d) of the Clean Water Act.

A POTW is responsible for identifying standard(s) applicable to each industrial user and applying the most stringent requirements where multiple provisions exist. Compliance with imposed standards can be achieved through implementation of best management practices, development of a pollution prevention program, and/or installation of pretreatment.

Parshall Flumes



Parshall Flume provides both accuracy and rangeability. Dimensions and capacities are in accordance with those published in the U.S. Department of the Interior's Water Measurement Manual.

Parshall Flumes are a primary flow element for flow measurement in open channels. The big advantages of Parshall Flumes are their self-cleaning capabilities, low head loss, single-head measurement, and wide operating range.

While commonly used in rectangular channels, they can also be adapted for use in circular channels. Flumes feature stiffening ribs, braces and anchor clips. Options include stilling well, staff gauge, flow sensors, adaptors, etc.

Clarification
Clarification on category-specific wastestream classifications may be provided by consulting the applicable regulation(s) and associated development documents, since wastestream types are addressed in the effluent guideline and categorical standard development process. When in doubt, the Control Authority can always require the CIU to monitor the wastestream(s) in question to quantify the presence (or lack thereof) of categorically regulated pollutants.

Reasonably accurate flow data must also be obtained for each wastestream type flowing through the monitoring point to ensure categorical pretreatment standards are adjusted accordingly.

Proper application of the CWF or FWA will result in:

- alternative limits being established for each regulated pollutant in each regulated process;
- both daily maximum and long-term average (i.e., 4-day, 30-day, or monthly) alternative limits being calculated for each regulated pollutant;

Wastestream Types Figure 16.

Regulated
Wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard.

Nonregulated, Unregulated
Wastestreams from an industrial process that are not regulated for a particular pollutant by a categorical pretreatment standard and are not defined as a dilute wastestream, e.g.:

- a process wastestream for which categorical standards have been promulgated but for which the deadline for compliance has not yet been reached.

- a process wastestream that currently is not subject to categorical pretreatment standards

- a process wastestream that is not regulated for the pollutant in question but is regulated for other pollutants.

Dilute
Wastestreams which have no more than trace or non-detectable amounts of the regulated pollutant. Defined in 40 CFR § 403.6(e)(1) of the General Pretreatment Regulations to include sanitary wastestreams, demineralized backwash streams, boiler blowdown, noncontact cooling water, storm water, and process wastestreams from certain standards based on the findings that these wastewaters contained none of the regulated pollutant or only trace amounts of it.

The EPA's *Guidance Manual for the Use of Production Based Pretreatment Standards and the Combined Wastestream Formula* should be consulted for more information on the proper application and adjustment of categorical pretreatment standards.

Although categorical standards are established based on a particular industrial category, the EPA provides several options for unique circumstances that justify adjustment of categorical standards for an individual facility:

____

CHECKLIST EXAMPLE FOR ASSESSMENT OF PERMANENTLY INSTALLED FLOWMETERS

INSPECTOR NAME:	DATE:
COMPANY NAME:	TYPE OF PRIMARY DEVICE:
SITE CODE #	SIZE:
ADDRESS:	
DIMENSIONS OF VAULT:	DEPTH OF VAULT:

TAKE PHOTOGRAPHS

1. IS FLUME LEVEL?

2. HEIGHT MEASUREMENT FROM TOP OF FLUME TO BOTTOM OF PERMANENT TRANSDUCER:

3. HOW HIGH DOES THE LEVEL GET IN FLUME?

4. DAILY MAXIMUM FLOW (CONVERTED TO LEVEL):

5. CAN YOU SETUP OUR TRANSDUCER UNDER OR NEXT TO THEIRS, WITHOUT DISTURBING THEIRS?

6. IS THEIR PERMANENT TRANSDUCER SETUP OVER THE PROPER MEASURING POINT ON THE FLUME?

7. RECORD ANY PROBLEMS WITH THE WAY THE PERMANENT TRANSDUCER / FLOWMENTER IS SETUP:

8. COMMENTS_____

_____

_____

Inspector's Signature _____

Permittee's Flow Measurement System

Four basic steps are involved in evaluating the permittee's flow measurement system:

- Physical inspection of the primary device
- Physical inspection of the secondary device and ancillary equipment
- Flow measurement using the primary/secondary device combination of the permittee
- Certification of the system using a calibrated, portable instrument

Facilities with a closed pipe flow measurement system present a challenge to the inspector. Have the facility personnel explain the operation of the system and how they calibrate the flow measurement system.

Check if it is calibrated yearly at a minimum. It is suggested that the facility conduct periodic monthly checks of the flow measurement system.

The inspector can do a calibration of the closed pipe flow measurement systems in the following ways:

1. If an open-channel primary device is maintained at the facility the inspector can obtain an instantaneous head reading to verify the accuracy of the closed channel flow measuring system. Flow should be within ±10 percent of the closed channel system.

2. The inspector can use a portable flow meter (usually consists of two strap-on sensors that mount on the pipe and utilize the Doppler principle) to verify the accuracy of the facility's flow measurement system by conducting side-by-side comparisons. Flow should be within ±10 percent.

3. Confirm that the calibration procedure demonstrated by the facility's calibration personnel is adequate. The following sections present procedures for inspecting the more common types of primary and secondary devices, for measuring flow using common permanent and portable systems, and for evaluating flow data.

Please note that the number of primary/secondary device combinations is limitless; therefore, it is not feasible to provide procedures for all systems. When encountering systems other than those discussed here the inspector should consult the manufacturer's manual or facility personnel for advice on how the flow-measurement system operates before preparing a written inspection procedure.

Removal Credits *(Credit USEPA)*

40 CFR §403.7 details the conditions by which a Control Authority may demonstrate consistent removal of pollutants regulated by categorical standards at their POTW, and in so doing, may extend removal credits to industries on a pollutant-specific basis to prevent redundant treatment. Removal credits are available for a pollutant if the pollutant is regulated by the sewage sludge use or disposal option employed by the POTW making the application request, or if the pollutant is listed in 40 CFR Part 403, Appendix G.

Also, the availability of removal credits is not limited to Appendix G pollutants for POTWs that dispose of sewage sludge in municipal solid waste landfills. Steps for developing such a request are in the EPA's *Guidance Manual for the Preparation and Review of Removal Credit Application*s.

Fundamentally Different Factors Variance Section 301(n) of the CWA authorizes adjustments of categorical pretreatment standards for existing sources who demonstrate they have factors which are fundamentally different from the factors the EPA considered during standards development (40 CFR §403.13). Variance requests must be based solely on information and data submitted during the development of the categorical standards and the adjusted effluent limitations must neither be more nor less stringent than justified by the fundamental difference nor result in a non-water quality environmental impact markedly more adverse than the impact considered by the EPA when developing the categorical standard.

Successful requests must detail factors well outside the range considered by the EPA in establishing the standard and not merely factors deviating from the average. Further, differences must not be similar to a significant number of other facilities in the category. A facility must request a variance in writing no later than 180 days after publication of a categorical Pretreatment Standard in the Federal Register.

Net/Gross Adjustment Categorical Pretreatment Standards

Net/Gross Adjustment Categorical pretreatment standards can be adjusted to reflect the presence of pollutants in a CIU's intake waters (40 CFR §403.15). To obtain a net/gross credit, the CIU must submit a formal written request to the Control Authority that demonstrates:

- Its intake water is drawn from the same body of water that the POTW discharges into (this can be waived if the Control Authority finds no environmental degradation will result);
- The pollutants present in the intake water will not be entirely removed by the treatment system operated by the CIU; and
- The pollutants in the intake water do not vary chemically or biologically from the pollutants limited by the applicable standard.

Inherent in this provision is the requirement that the CIU employ a treatment technology capable of meeting the categorical pretreatment standard(s). Net/gross adjustments should not be granted to CIUs that have no treatment. Further, credits are only granted to the extent necessary to meet the applicable standard(s), up to a maximum value equal to the influent value. A Net/Gross adjustment of Categorical Pretreatment Standards can be requested when pollutants are present in an IUS intake water.

Innovative Technology--in accordance with 307(e) of the CWA, existing CIUs choosing to install an innovative treatment system may receive approval from the Control Authority for up to a two year extension to their applicable categorical pretreatment standards compliance deadline, provided:

- The innovative treatment has a reasonable potential to result in significantly greater pollutant removal or equivalent removal at a substantially lower cost than the technologies considered by the EPA when developing the categorical standard;
- The innovative technique has the potential for industry-wide application; and
- The proposed compliance extension will not cause or contribute to the violation of the POTW's NPDES permit.

While policy has been established for universal categorical variance requests, occasionally, a Control Authority may merely need assistance to classify a CIU and/or to determine applicable categorical limitations. Provisions in the General Pretreatment Regulations allow POTWs and IUs to request an EPA category determination for a specific IU within 60 days after the effective date of the standard in question [40 CFR §403.6(a)].

Even after the formal timeframe for requesting a categorical determination, the EPA (and states) will assist POTWs and IUs with categorization issues.

Such requests, however, do not affect applicable reporting requirements, including timely requests submitted under 40 CFR §403.6(a). Additionally, the EPA has addressed universal CIU questions posed by Control Authorities in various memoranda and guidance:

Research and Development (R&D) Facilities

Unless specifically addressed in the categorical regulation or associated development document, R&D facilities where there is no commercial sale of products from the facility, are not subject to categorical standards.

Should an R&D facility need pollution controls to comply with prohibited discharge standards and/or local limits, the development documents may serve as guidance on the performance of pollution control technologies.

Certification Statements

In lieu of requiring self-monitoring, some standards allow CIUs to certify that they do not use, generate or discharge a regulated pollutant [e.g. Pulp, Paper and Paperboard facilities can certify that chlorophenolic compounds are not used (40 CFR Part 430) and Pharmaceutical Manufacturing facilities can certify that cyanide is not used or generated (40 CFR Part 439)]. Facilities providing such certifications are still considered CIUs, and therefore are subject to other pretreatment standards and requirements.

Lack of specific categorical effluent limitations IUs subject to PSES or PSNS that merely require compliance with 40 CFR Part 403 are not considered CIUs. However, these users may still be classified as SIUs and are still subject to the general and specific prohibitions and any local limits.

Total Toxic Organics (TTO) *(Credit USEPA)*

Seven categorical regulations currently limit the discharge of TTO:

- **40 CFR Part 413 - Electroplating**
- **40 CFR Part 433 - Metal Finishing**
- **40 CFR Part 464 - Metal Molding and Casting**
- **40 CFR Part 465 - Coil Coating**
- **40 CFR Part 467 - Aluminum Forming**
- **40 CFR Part 468 - Copper Forming**
- **40 CFR Part 469 - Electrical and Electronic Components (Phase I and II)**

For each of these standards, TTO refers to the sum of the masses or concentrations of certain toxic organic pollutants found in the regulated discharge at a concentration greater than 0.01 milligrams per liter (mg/l).

However, the toxic organic pollutants regulated by the TTO limit are specific to each industrial category. Further, industrial categories may provide some flexibility with regard to monitoring and/or reporting requirements as follows:

40 CFR Parts 413 and 433 allow development and implementation of a Toxic Organic Management Plan (TOMP) in lieu of routine monitoring while 40 CFR Part 469 allows development and implementation of a Solvent Management Plan.

Upon approval of these plans by the Control Authority, the CIU can demonstrate compliance with TTO requirements by certifying that the facility is adhering to this Plan to prevent organics from being discharged to the POTW. A specific certification statement must be signed and provided to the Control Authority on a regular basis.

40 CFR Parts 464, 465, 467, and 468 allow an option to demonstrate compliance with an Oil and Grease limit in lieu of demonstrating compliance with a TTO limit. The option chosen by the CIU must be utilized for all reports required (i.e., BMR, 90-daycompliance report, and periodic compliance reports).

The EPA's *Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards* should be consulted for more information on TTO.

MAHL MAIL *(Credit USEPA)*

Maximum Allowable Headworks Loading Method (MAHL)
Pollutant by pollutant, treatment plant data are used to calculate removal efficiencies, before applying the most stringent criteria (i.e., water quality, sludge quality, NPDES permit, or pollutant inhibition levels) to back-calculate the MAHLs. Subtracting out contributions from domestic sources, the available industrial loading is then either evenly distributed among the IUs, or allocated on an as needed basis to those IUs discharging the pollutant above background levels.

Maximum Allowable Industrial Load (MAIL)
The MAIL is the total daily mass that a POTW can accept from all permitted IUs and ensure the POTW is protecting against pass through and interference.

Headworks' "Rotating Barscreens"

Headworks flooding or overflowing because of high grease (FOG) loading.

LOCAL LIMITS OBSERVATION SHEET *Example*

SITE DESCRIPTION:

SITE CODE #: **DATE:**

TIME	pH	TEMP.	RES.CL_2	INITIALS
0900				
1200				
1430				
1700				
2000				
2230				
0100				
0430				

DAILY TOTAL FLOW:

PICKLE JAR IW#			
FIELD COMP IW#			
VOC's IW#			
TPH IW#			

SAMPLES COLLECTED

PARAMETER	YES	NO	PARAMETER	YES	NO
601/602 (HOW MANY)			BOD, COD, TSS		
8240 (HOW MANY)			NO_2/NO_3		
SULFIDES			METALS		
TKN			608		
AMMONIA (NH_4)			1657		
CN			625		
TPH (HOW MANY)			8270		
8140			8080		

IF NO SAMPLE COLLECTED, RECORD ON BACK AS TO WHY.

More on Local Limits *(Credit USEPA)*

Prohibited discharge standards are designed to protect against pass-through and interference generally. Categorical pretreatment standards, on the other hand, are designed to ensure that IUs implement technology-based controls to limit the discharge of pollutants. Local limits, however, address the specific needs and concerns of a POTW and its receiving waters.

Federal regulations at 40 CFR §§403.8(f)(4) and 122.21(j)(4) require Control Authorities to evaluate the need for local limits and, if necessary, implement and enforce specific limits as part of pretreatment program activities. Local limits are developed for pollutants (e.g. metals, cyanide, BOD5 TSS, oil and grease, organics) that may cause interference, pass through, sludge contamination, and/or worker health and safety problems if discharged in excess of the receiving POTW treatment plant's capabilities and/or receiving water quality standards.

Typically, local limits are developed to regulate the discharge from all IUs, not just to CIUs, and are usually imposed at the "end-of-pipe" discharge from an IU (i.e., at the point of connection to the POTW's collection system). In evaluating the need for local limit development, it is recommended that Control Authorities:

- Conduct an industrial waste survey to identify all IUs that might be subject to the pretreatment program;
- Determine the character and volume of pollutants contributed to the POTW by these industries;
- Determine which pollutants have a reasonable potential for pass through, interference, or sludge contamination;
- Conduct a technical evaluation to determine the maximum allowable POTW treatment plant headworks (influent) loading for at least arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, silver, and zinc (Figure19);
- Identify additional pollutants of concern;
- Determine contributions from unpermitted sources to determine the maximum allowable treatment plant headworks loading from "controllable" industrial sources (Figure 20);
- Implement a system to ensure these loadings will not be exceeded.

Other local limit approaches available to Control Authorities include:
Collection System Approach Pollutants found to be present which may cause fire and explosion hazards or other worker health and safety concerns, are evaluated for their propensity to volatilize and are modeled to evaluate their expected concentration in air. Comparisons are made with worker health exposure criteria and lower explosive limits. Where values are of concern, the Control Authority may set limits or require development of management practices to control undesirable discharges. The collection system approach may also consider the prohibition of pollutants with specific flashpoints to prevent discharges of ignitable wastes. The EPA's *Guidance to Protect POTW Workers from Toxic and Reactive Gases and Vapors* details strategies for developing such local limits.

Industrial User Management Practice Plans
These plans typically consist of narrative local limits requiring IUs to develop management practices (e.g., chemical management practices, best management practices, and spill prevention plans) for the handling of chemicals and wastes.

The need for and suggested contents of such plans may be found in the EPA's *Control of Slug Loadings to POTWs: Guidance Manua*l, and *Spill Prevention, Control, and Countermeasure (SPCC) Information Guid*e.

Case-by-Case Discharge Limits *(Credit USEPA)*

These numeric local limits are based on best professional judgment (**BPJ)** and available pollution prevention and treatment technologies which are known to be economically feasible. This approach is most often used when insufficient data are available to employ the methods outlined above.

Local Specific Prohibitions
POTW specific prohibitions may be imposed in addition to the prohibitions detailed in 40 CFR § 403.5 (a) & (b) to address hydraulic, pollutant specific, and/or aesthetic concerns; e.g.:

- Noxious or malodorous liquids, gases, or solids creating a public nuisance.
- Wastestreams which impart color and pass through the POTW treatment plant.
- Storm water, roof runoff, swimming pool drainage.
- Wastewaters containing radioactive wastes or isotopes.
- Removed substances from pretreatment of wastewater.

Regardless of the approaches taken by a Control Authority, local limits should correct existing problems, prevent potential problems, protect the receiving waters, improve sludge use options, and protect POTW personnel. Additional existing EPA guidance on the subject includes:

- *Guidance for Preventing Interference at POTWs*
- *Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program*
- *Supplemental Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program: Residential and Commercial Toxic Pollutant Loadings and POTW Removal Efficiency Estimation*
- *Toxicity Identification Evaluation: Characterization of Chronically Toxic Effluent*s.

Additionally, many EPA Regions and States have developed local limits guidance to address regional and state issues.

Chapter Summary

Categorical Pretreatment Standards and local limits are distinct and complementary types of Pretreatment Standards. Promulgation of a categorical Pretreatment Standard by EPA in no way relieves a Control Authority from its obligation to evaluate the need for, and to develop, local limits to meet the general and specific prohibitions in the General Pretreatment Regulations. As mentioned earlier, categorical Pretreatment Standards are developed to achieve a degree of water pollution control for selected industries and pollutants on the basis of a national assessment of available technology and costs. Local limits are intended to prevent site-specific problems for a POTW and the environment resulting from Industrial Users.

In implementing its pretreatment program, a Control Authority is required to enforce the *applicable Pretreatment Standard* (i.e., federal, state, or local, whichever is most stringent). When the Control Authority is drafting a permit for an Industrial User subject to categorical Pretreatment Standards, the task of determining the applicable effluent limits to apply can be complicated.

Local limits are often more stringent than categorical Pretreatment Standards because they are based on local, site-specific conditions. In addition, there might be local limits for more pollutants than are regulated in the applicable categorical Pretreatment Standard. Therefore, a permit may contain a mixture of categorical Pretreatment Standards and local limits. One complicating factor is that, in contrast to the categorical Pretreatment Standards that apply to individual discharges from regulated processes (end-of-process), local limits normally apply at the point(s) of discharge to the public sewer system (end-of-pipe).

In the situation where the Industrial User's discharge to the public sewer contains *only* wastewater from a process regulated under a particular categorical standard, the end-of-process pollutant load is the same as measurement of the pollutant over the day [40 CFR 122.2]. In the situation where the Industrial User's discharge to the public sewer contains *only* wastewater from a process regulated under a particular categorical standard, the end-of-process pollutant load is the same as the end-of-pipe pollutant load. The determination of which limits apply, local or categorical, is accomplished by simply choosing the limit that is numerically more stringent if the terms of duration of the limits are the same (e.g., both limits are daily maximum limits or monthly average limits). More commonly, the industry's discharge at the point of connection contains a mixture of categorical process wastestreams and noncategorical process wastestreams.

If categorical standards are to be applied at the end-of-pipe where additional wastestreams exist, the permit writer must adjust the categorical Pretreatment Standards to end-of-pipe limits. Appendices I and J contain guidance for calculating production-based standards and using the CWF, respectively. Such adjusted limits must then be compared to the Control Authority's local limits, and the most stringent limit would be included in the permit.

In other instances, the Control Authority might find it necessary or preferable to monitor the industrial discharge at more than one location. In such a case, the permit must clearly indicate where the specific limits apply and where samples for various parameters must be collected. For example, a Control Authority might want to regulate a metal-finishing industry by requiring monitoring for local limits at the connection to the sewer system, monitoring for categorical Pretreatment Standards at the discharge from the pretreatment "system", and monitoring for cyanide on the segregated wastestream from the cyanide treatment unit.

Pretreatment and Wastewater Sampling Section

The General Pretreatment Regulations require Control Authorities to monitor each SIU at least annually and each SIU to self-monitor semi-annually.

As with inspections, the Control Authority should assess site-specific issues, such as SIU effluent variability, impact of this effluent on the POTW, and the SIU's compliance history to determine appropriate sampling frequencies (i.e., if more frequent monitoring is necessary).

For more detailed information on sampling frequencies, consult the EPA's 2017 *Industrial User Inspection and Sampling Manual for POTW*s.

Parameter	Sample type	Container	Preservative	Holding time
pH	Grab	Polyethylene or Glass	N/A	analyze immediately 15 minutes
BOD	Composite	Polyethylene or Glass	chilled to 4°C	48 hours
TSS	Composite	Polyethylene or Glass	chilled to 4°C	7 days
NH 3 as N	Composite	Polyethylene or Glass	chilled to 4°C, H2 SO_4 to pH<2	28 days
Oil and Grease	Grab	Glass	chilled to 4°C, HCl or H_2SO_4 to pH<2	28 days
Cyanide, total	Grab	Polyethylene or Glass	chilled to 4°C, NaOH to a pH >12, and 0.6g of ascorbic acid if residual chlorine is present	14 days
Metals (total) excl. Cr $^{+6}$ B, and Hg	Composite	Polyethylene or Glass	HNO3 to pH<2	6 months
624 (volatiles organics)	Grab	Amber glass, w/ Teflon septum lid and zero headspace	chilled to 4°C (additional laboratory preservation required)	7 or 14 days, depending on specific organic
625 (semi-volatile organics)	Composite	Amber glass w/ Teflon lined lid	chilled to 4°C (additional laboratory preservation required)	7 days for sample prep; 40 days for extract

Sampling

Sampling is the most appropriate method for verifying compliance with pretreatment standards. Monitoring location(s) are designated by the Control Authority and must be such that compliance with permitted discharge limits can be determined. Where possible, the Control Authority should not designate monitoring locations that are confined spaces or that are difficult to access or difficult to place the automated sampling equipment.

Monitoring locations should:

- be appropriate for waste stream conditions;
- be representative of the discharge;
- have no bypass capabilities; and
- allow for unrestricted access at all times.

Control Authorities should measure flow to allow for collection of flow-proportioned composite samples, which are required, unless flow-proportional sampling is not feasible. Flow-proportional composite samples are preferred over time composite samples particularly where the monitored discharge is intermittent or variable.

Desired analyses dictate the preparation protocols, equipment, and collection bottles to be used to avoid contamination of samples or loss of pollutants through improper collection. Sampling for such pollutants as pH, cyanide, oil and grease, flashpoint, and volatile organic compounds require manual collection of grab samples.

Similar to composite samples, grab samples must be representative of the monitored discharge and are to be collected from actively flowing wastestreams. Fluctuations in flow or the nature of the discharge may require collection of and hand-composting of more than one grab sample to accurately assess compliance.

To ensure defensibility of data, Control Authorities should develop and implement standard operating procedures and policies detailing sample collection and handling protocols in accordance with 40 CFR Part 136.

Adherence to proper sample collection and handling protocols, 40 CFR Part 136 approved analytical methodologies, and record-keeping requirements [40 CFR §403.12(o)(1)] (see Figure 25) can be verified through review of field measurement records, chain of custodies, and lab reports. Field measurement records may require information regarding sample location, condition of and programmed settings for sampling equipment, wastewater meter readings, and information for such parameters as pH and temperature which require analysis in the field.

Chain of custody forms serve as a link between field personnel and the laboratory and contain information regarding sample matrix, type, and handling. Lab reports should contain the minimum information specified in 40 CFR §403.12(o)(1)(ii-iv) as well as any additional information necessary to demonstrate compliance with 40 CFR Part 136 requirements (e.g., analytical methodology, sample preparation date and time, time of analysis).

Use of standardized forms which prompt recording of information necessary for demonstrating compliance with applicable requirements will aid in ensuring it can be used as admissible evidence in enforcement proceedings or in judicial actions.

Types of Samples *(Credit USEPA)*

General
There are four types of routine samples that are collected by the POTW's Sampling Section: grab, time proportional composites, flow proportional composites, and hand composites. The sampling method used depends largely on the types of analyses to be run, and the nature of the wastestream being sampled. Each sampling method is described in this section.

Most POTW's will define the sampling methods which must be used by industrial users (IUs) to obtain representative samples to show compliance with their permits:
Example

(1) A grab sample is an individual sample collected in less than 15 minutes without regard for flow or time of day. pH, cyanide, oil and grease, sulfide, and volatile organics must be collected as grab samples.

(2) 24-hour flow proportional composite samples where feasible. The POTW may waive this requirement if the IU demonstrates that this method is not feasible. Samples would then be taken by means of time proportional composite sampling methods, or by hand composite where the IU can demonstrate that this will provide a representative sample of the effluent being discharged.

The volume of sample to be collected by any of these methods is dependent on the number and types of analyses that must be performed.

Grab Samples
Grab samples are individual samples collected in less than 15 minutes without regard to flow or time of day. Grab samples are normally taken manually, but can be pumped. Oil and grease samples and purgeable organics are exceptions and must be taken manually.

The collection of a grab sample is appropriate when a sample is needed to:

- Represent an effluent that does not discharge on a continuous basis.
- Provide information about instantaneous concentrations of pollutants at a specific time.
- Allow collection of a variable sample volume.
- Corroborate composite samples.
- Monitor parameters not amenable to compositing (e.g., pH, temperature, dissolved oxygen, chlorine, purgeable organics, oil and grease, coliform bacteria, and others specified by the NPDES permit, which may include phenols, sulfites, and hexavalent chromium).

Grab Sample

A sample which is taken from a water or wastestream on a one-time basis with no regard to the flow of the water or wastestream and without consideration of time. A single grab sample should be taken over a period of time not to exceed 15 minutes.

EPA Sample Identification Methods

Identify each sample accurately and completely. Use labels or tags to identify the samples that are moisture-resistant and able to withstand field conditions. If moisture-resistant labels are not available, place a piece of tape over each label to prevent water damage. Use a waterproof pen to complete the labels or tags. A numbered label or tag associated with a field sample data sheet containing detailed information on the sample is preferable to using only a label or tag for information.

The information for each sample should include the following:

- Facility name/location
- Sample site location
- Sample number
- Name of sample collector
- Date and time of collection
- Indication of grab or composite sample with appropriate time and volume information
- Identification of parameter to be analyzed
- If the sample is preserved and, if so, the preservative used

Various Composite Sampling Techniques (Credit EPA)

The four primary methods of composite sample collection are time compositing, flow proportion compositing, sequential compositing, and continuous compositing. Table 5-1 lists the advantages and disadvantages of these methods. The permit may specify which type of composite sample to use. Composite samples are collected either manually by combining multiple grab samples or by using automatic sampling equipment. Inspectors should consider variability in wastestream flow rate, parameter concentrations and the approved EPA methods when choosing compositing methods,

sampling equipment (tubing and containers), and quality assurance procedures. The compositing methods are as follows:

• **Time Composite Sample**: This method requires discrete sample aliquots collected in one container at constant time intervals. This method is appropriate when the flow of the sampled stream is constant (flow rate does not vary more than ±10 percent of the average flow rate) or when flow monitoring equipment is not available.

• **Flow-Proportional Composite Sample**—in one method, a constant sample volume is collected at varying time intervals proportional to stream flow (e.g., 200 milliliters sample collected for every 5,000 gallons of flow). In the other method (which has two variations, see Table 5-1), the sample is collected by increasing the volume of each aliquot as the flow increases, while maintaining a constant time interval between the aliquots.

• **Sequential Composite Sample**—this method requires discrete samples collected in individual containers at constant time intervals or discharge increments; for example, samples collected every 15 minutes, composited into separate containers each hour. The discrete samples can then be manually flow-proportioned to form the composite sample. Alternatively, a constant sample volume is collected at constant discharge volume increments measured with a flow totalizer.

• **Continuous Composite Sample**—collect this sample continuously from the wastestream. The sample may be constant volume, or the volume may vary in proportion to the flow rate of the wastestream.

Influent Sample Collection

Document and take influent samples at points of high turbulence flow to ensure good mixing. In some instances, the most desirable location may not be accessible. Ensure sampling points are located prior to any internal facility return lines, and sampling equipment should be placed so that it does not interfere with flow measuring devices. The preferred sampling points for raw wastewater are at the most downstream location from the collection lines, but prior to preliminary treatment:

- Waste flowing from the last process in a manufacturing operation, for an industrial user.
- Pump wet well (if turbulent).
- Upstream collection lines, tank, or distribution box following pumping from the wet well or sump.
- Flume throat.
- Aerated grit chamber.
- Upstream siphon following the comminutor (in absence of grit chamber). If it is not possible to sample at a preferred point, choose an alternative location and document the basis for choosing that location.

Table 5-1. Compositing Methods			
Method	**Advantages**	**Disadvantages**	**Comments**
Time Composite			
Constant sample volume, constant time interval between samples.	Minimal manual effort; requires no flow measurement.	May lack representativeness for highly variable flows.	Widely used in both automatic and manual sampling.
Flow-Proportional Composite			
Constant sample volume, time interval between samples proportional to stream flow.	Minimal manual effort.	Requires accurate flow measurement reading equipment; manual compositing from flowchart.	Widely used in automatic as well as manual sampling.
Constant time interval between samples, sample volume proportional to total stream flow at time of sampling.	Minimal instrumentation.	Manual compositing from flowchart in absence of prior information on the ratio of minimum to maximum flow; chance of collecting too small or too large individual discrete samples for a given composite volume.	Used in automatic samplers and widely used as manual method.
Constant time interval between samples, sample volume proportional to total stream flow since last sample.	Minimal instrumentation.	Manual compositing from flow chart in absence of prior information on the ratio of minimum to maximum flow; chance of collecting too small or too large individual discrete samples for a given composite volume.	Not widely used in automatic samplers but may be done manually.
Sequential Composite			
Series of short period composites, constant time intervals between samples.	Useful if fluctuations occur and the time history is desired.	Requires manual compositing of aliquots based on flow.	Commonly used; however, manual compositing is labor intensive.
Series of short period composites, aliquots taken at constant discharge increments.	Useful if fluctuations occur and the time history is desired.	Requires flow totalizer; requires manual compositing of aliquots based on flow.	Manual compositing is labor intensive.
Continuous Composite			
Constant sample volume.	Minimal manual effort, requires no flow measurement highly variable flows.	Requires large sample capacity; may lack representativeness for highly variable flows.	Practical but not widely used.
Sample volume proportional to stream flow.	Minimal manual effort, most representative especially for highly variable sample volume, variable pumping capacity and power.	Requires accurate flow measurement equipment, large sample volume, variable pumping capacity, and power.	Not widely used.

Effluent Sample Collection
Collect effluent samples at the location specified in the NPDES permit. Occasionally, municipal plant permits may specify sampling prior to chlorination. For these plants, monitor all parameters at the upstream location except fecal coliforms, pH, and total residual chlorine. Collect wastewater for use in bioassays at the location specified in the facility's NPDES permit. Collect samples either manually (grab or composite) or with automatic samplers (continuous or composite).

The following general guidelines apply when taking samples:

- Take samples at a location specified in the NPDES permit and/or at a location selected to yield a representative sample.
- Use the sampling method (grab, composite, continuous) specified in the permit. Some parameters that must be collected as an individual grab sample are dissolved oxygen, total residual chlorine, oil and grease, coliform bacteria, purgeable organics, sulfides, cyanide, and total phenols. • Avoid collecting large nonhomogeneous particles and objects.
- Collect the sample facing upstream to avoid contamination.
- Do not rinse sample container with sample when collecting oil and grease and microbiological samples, but fill the container directly to within 2.5 to 5 cm from the top.
- Fill the container completely if the sample is to be analyzed for purgeable organics, oxygen, ammonia, hydrogen sulfide, free chlorine, pH, hardness, sulfite, ammonium, ferrous iron, acidity, or alkalinity.
- Collect sufficient volume to allow for quality assurance testing. (see EPA's website https://www.epa.gov/cwa-methods for a listing of all approved sampling methods. Each sampling method will indicate the required sampling equipment, sampling containers and sampling volume, but additional volumes may be necessary for quality assurance testing.

The following general guidelines apply when using automatic samplers:

- Collect samples where the wastewater is well mixed. Collect the sample near the center of the flow channel at 0.4 to 0.6 depth (mid-depth).
- Obtain a sufficient volume of sample to perform all required analyses plus any additional amount for quality control. Individual portions of a composite sample should be at least 100 milliliters to minimize sampler solids bias.
- For automatic samplers that use a peristaltic pump, obtain adequate flow rates in the sampler tubing to effectively transport the suspended solids. To avoid solids bias, the velocity of the wastewater in sample tubing should be at least 2 feet per second (fps) and the tubing diameter should be at least 0.25 inch.
- Time of sample collection begins when the last aliquot is dispensed into the composite sample container.

Sample Volume
The volume of sample collected depends on the type and number of analyses needed, as reflected in the parameters to be measured. Obtain the volume of the sample sufficient for all the required analyses plus an additional amount to provide for any split samples or repeat analyses.

EPA approved sampling methods provide a guide to sample volumes required for determining the constituents in wastewater (available at https://www.epa.gov/cwa-methods).

Consult the laboratory receiving the sample for any specific volume required. EPA's Methods for Chemical Analysis of Water and Wastes (EPA, 1979a) and Handbook for Sampling and Sample Preservation of Water and Wastewater (EPA, 1982), and the current EPA-approved edition of Standard Methods for the Examination of Water and Wastewater (American Public Health Association (APHA), American Water Works Association (AWWA), and Water Environment Federation (WEF), 2013) contain specific recommended minimum sample volumes for different pollutant parameters.

Sample Containers
The regulations at 40 CFR Part 136 describe required sample containers, sample preservation, and sample holding time. EPA approved sampling methods indicate appropriate sample containers for each analysis It is essential that the sample containers be made of chemically resistant material unaffected by the concentrations of the pollutants measured. In addition, sample containers must have a closure that will protect the sample from contamination. Collect wastewater samples for chemical analysis in plastic (polyethylene) containers. Exceptions to this general rule are oil and grease samples, pesticides, phenols, polychlorinated biphenyls (PCBs), and other organic pollutant samples.

Collect these in properly cleaned glass jars or bottles and seal. Collect bacteriological samples in properly sterilized plastic or glass containers. Collect samples that contain constituents that will oxidize when exposed to sunlight (such as iron cyanide complexes) in dark containers. Ensure sample containers are clean and uncontaminated. Check analytical procedures to determine if they specify container cleaning procedures. Use precleaned and sterilized disposable containers (e.g., polyethylene cubitainers).

If these are not used or if the analytical method does not specify procedures, use the following procedures for cleaning sample containers:

- Wash with hot water and detergent.
- Rinse with acid (e.g., nitric for metals).
- Rinse with tap water, then rinse three or more times with organic-free water.
- Rinse glass containers with an interference-free, redistilled solvent (such as acetone or methylene chloride for extractable organics.
- Dry in contaminant-free area.

EPA Sample Identification Procedures
Identify each sample accurately and completely. Use labels or tags to identify the samples that are moisture-resistant and able to withstand field conditions. If moisture-resistant labels are not available, place a piece of tape over each label to prevent water damage.

Use a waterproof pen to complete the labels or tags. A numbered label or tag associated with a field sample data sheet containing detailed information on the sample is preferable to using only a label or tag for information.

The information for each sample should include the following:

- Facility name/location
- Sample site location
- Sample number
- Name of sample collector
- Date and time of collection
- Indication of grab or composite sample with appropriate time and volume information
- Identification of parameter to be analyzed • If the sample is preserved and, if so, the preservative used

Wastewater Sample Preservation and Holding Time Introduction

In most cases, wastewater samples contain one or more unstable pollutants that require immediate (e.g., within 15 minutes) preservation and/or analysis. Provide appropriate chemical preservation before transferring samples to the laboratory. EPA approved sampling methods indicate appropriate sample preservation for each analysis (sampling methods are available at https://www.epa.gov/cwa-methods).

Procedures used to preserve samples include cooling, pH adjustment, and chemical treatment. For some parameters, such as cyanide and phenols, add preservatives to sample bottles prior to or immediately following sample collection.

For many samples, if preservatives are not appropriately used, bacteria can quickly degrade certain constituents (such as phenols and phosphorus). Other constituents may volatilize (such as volatile organics and sulfides) or may react to form different chemical species (hexavalent chromium, for example).

Proper preservation and holding times are essential to ensure sample integrity (see 40 CFR Part 136). Analysis of samples within one day ensures against error from sample deterioration. However, such prompt analysis is not feasible for composite samples in which portions may be stored for as long as 24 hours.

Where possible, provide sample preservation during compositing, usually by refrigeration to 6°C (or icing). If using an automatic sampler with ice, replace the ice as necessary to maintain low temperatures. This is a limitation of automatic samplers used during the summer when ice must be frequently replaced. Table II of 40 CFR 136.3(e) indicates maximum sample holding times. Times listed are the maximum holding times between sample collection and analysis that are allowed for the sample to be considered valid. Unless otherwise specified in the method, holding time limitations begin upon combination of the last aliquot in a sample. When use of an automatic sampler makes it impossible to preserve each aliquot, the chemical samples may be preserved by maintaining at 6°C until compositing and sample splitting is completed (40 CFR 136.3(e)).

Transfer and Custody of Samples

To ensure the validity of the permit compliance sampling data in court, written records must accurately trace the custody of each sample through all phases of the monitoring program (EPA Order 5360.1). The primary objective of this chain-of-custody is to create an accurate written record (see an example chain-of-custody form in Appendix M) that can be used to trace the possession and handling of the sample from the moment of its collection through its analysis and introduction as evidence.

The following procedures are appropriate for the transfer of custody and shipment of samples:

- Use sample seals to protect the sample's integrity from the time of collection to the time it is opened in the laboratory, including the time the sample is within an automatic sampling apparatus, thus the automatic sampler should be sealed on the outside. The seal should indicate the collector's name, the date and time of sample collection, and sample identification number. For automatic samplers, seals should indicate the sample time at which the apparatus began sampling, as the sample container is subsequently sealed in the apparatus.
- Pack samples properly to prevent breakage. Seal or lock the shipping container to readily detect any evidence of tampering. Use of tamper-proof evidence tape is recommended.
- Place samples on ice or synthetic ice substitute that will maintain sample temperature at 6°C throughout shipment.
- The responsibility for proper packaging, labeling, and transferring of possession of the sample lies with the inspector. Accompany every sample with a sample tag and a chain-of-custody record that has been completed, signed, and dated. The chain-of-custody record should include the names of

sample collectors, sample identification numbers, date and time of sample collection, location of sample collection, and names and signatures of all persons handling the sample in the field and in the laboratory.
• The originator retains a copy of the chain of custody forms. Also, the originator must retain all receipts associated with the shipment.
• EPA Inspectors with the responsibility of working with hazardous materials that are placed in commerce (transporting/shipping) must have hazardous materials training as required by the Department of Transportation (see Appendix N).
• When transferring possession of samples, the transferee must sign and record the date and time on the chain-of-custody record (use the currently approved record). In general, custody transfers are made for each sample, although samples may be transferred as a group, if desired. For each sample being transferred, the transferee should list the sample and their name on the custody record. Each person who takes custody must fill in the appropriate section of the chain-of-custody record. Both the transferee and person who takes custody of the sample(s) must sign the custody record.
• Pack and ship samples in accordance with applicable International Air Transportation Association (IATA) and/or DOT regulations.

Quality Control
Conduct control checks during the actual sample collection to determine the performance of sample collection techniques. In general, the most common monitoring errors usually are improper sampling methodology, improper preservation, inadequate mixing during compositing and splitting, and excessive sample holding time. In addition, collect and analyze the following samples to check sample collection techniques:

Blanks
Trip blank
Trip blanks are vial(s) filled at the laboratory with deionized water. The blank(s) follows the same handling and transport procedures as the samples collected during the event. The blank(s) functions as a check on sample contamination originating from sample transport, shipping and from site conditions. Note: Expose the trip blank vial(s), to the same environmental conditions (light, temperature, etc.) of the sample vial(s) but do not open until it is time for analysis.

Field blank/field reagent blank
Field blanks are similar to trip blanks except they are prepared in the field with deionized water exactly as the sample(s) that are collected. Field blanks are used to check for analytical artifacts and/or background introduced by sampling and analytical procedures.

Temperature blank.
A temperature blank is a small sample bottle filled with distilled water that is placed in each cooler prior to shipment. Upon arrival at the laboratory the temperature of the sample bottle is measured to evaluate if samples were adequately cooled during sample shipment.

Equipment/rinsate blank
Collect an equipment/rinsate blank when using an automatic sampler or other non-dedicated equipment during the sampling process. The blank is a check of the equipment cleanliness. For automatic samplers, prepare blanks prior to collecting samples, by pumping deionized organic free water (rinsate) through the sampler and collecting the discharge purge water in a sample container for analysis for the constituents of concern.

Field Duplicate
Collect a field duplicate sample simultaneously from the same source at selected stations on a random timeframe by grab samples or from two sets of field equipment installed at the site. Duplicate samples check analytical precision as well as evaluate the “representativeness” of the sample aliquot.

Split Samples
Split samples are samples that have been divided into two containers for analysis by separate laboratories. These samples provide an excellent means of identifying discrepancies in the permittee’s analytical techniques and procedures. When filling split samples from a single composite jug, shake the composited sample well and half fill the EPA sample container, then shake the composite again and fill half of the permittee’s container. Repeat the procedure for each parameter collected. The laboratories performing the sample analyses should also use the following control measures:

Prep/Reagent Blank
A prep/reagent blank is a sample consisting of reagent(s), without the target analyte or sample matrix, introduced into the analytical procedure at the appropriate point and carried through all subsequent steps to determine the contribution of the reagents and to aid in identifying errors in the observed value that may result from the analytical steps.

Quality Control Sample
A quality control sample is an uncontaminated sample matrix spiked with known amounts of analytes from a source independent from the calibration standards. Use this sample to establish intra-laboratory or analyst specific precision and bias or to assess the performance of all or a portion of the measurements’ system.

Matrix Spike/Matrix Spike Duplicate (MS/MSD)
A matrix spike/matrix spike duplicate sample is three times the normal volume required for a specific chemical analysis to which a known quantity of analyte has been added prior to all sample preparation. The laboratory utilizes the MS/MSD samples as part of their Quality Assurance/Quality Control Program.

- Use a matrix spike to verify accuracy of the analytical procedures.
- A matrix spike duplicate is a duplicate of a matrix spike sample. It measures the precision of the analysis in terms of relative percent difference.

Table 5-2 indicates quality control procedures for field analyses and equipment. Quality control is discussed in greater detail in Chapter 7 EPA's NPDES

Compliance Sampling Evaluation

Wastewater sampling/analysis is an integral part of the National Pollutant Discharge Elimination System (NPDES) Compliance Monitoring Program. NPDES permits contain specific and legally enforceable effluent limitations and monitoring requirements.

Objectives and Requirements
When evaluating the permittee sampling program, the inspector should:

- Verify that the permittee's sampling program complies with the permit.
- Verify that the permittee's sampling program complies with:
  - Title 40 of the *Code of Federal Regulations* (CFR), sections 136.1 to 136.6 and Appendices A, B, and C (Guidelines for Establishing Test Procedures for the Analysis of Pollutants) for wastewater samples; and 40 CFR Part 503.
- Document potential violations to support enforcement action.

In addition, specific objectives of the sampling conducted by inspectors include the following:

- Verify compliance with effluent limitations.
- Verify accuracy of reports and program self-monitoring.
- Support enforcement action.
- Support permit development reissuance and/or revision.
- Determine the quantity and quality of effluent.

Sampling, analysis, preservation technique, sample holding time, and sample container requirements are provided under 40 CFR Part 136 as authorized by section 304(h) of the Clean Water Act (CWA). For all NPDES permittees the inspector should perform a review of sampling procedures and quality control measures the facility uses to ensure the integrity of sample data.
To evaluate sampling procedures, assess the following eight areas:

- Sample site locations
- Sample collection techniques
- Field measurements
- Sample labeling (including locations) and documentation
- Sample preservation and holding time
- Transfer of custody and shipment of samples
- Quality control
- Data handling and reporting

Sampling Equipment Maintenance Example

Basic maintenance for samplers includes: periodic calibration and general equipment checking, and replacement of the internal desiccant and fuses. Routine cleaning or replacement of tubing and other parts should be done following the manufactures guidelines or according to your SOP.

Basic maintenance of the flow meters includes: periodic replacement of the internal desiccant, plotter paper, ribbon, fuses, and any broken re-roll spool assemblies. Note: Some flow meters have two tabs on the sides which are extremely thin and easily broken.

The NiCad and Gel Cell batteries need to be recharged on a regular basis. Any battery that reads less than 12.50 when checked should not be installed or left on any of the sampling equipment. At the battery charging station, areas are set aside for batteries that need to be charged and batteries already charged.

To prolong battery life, NiCad batteries should be fully discharged before recharging for a maximum of 24 hours, in accordance with the procedures described in the manufacturer's operations and maintenance manuals. Always bring a second set or back-up set of batteries with you.

It is important to note that charged NiCad batteries, if left unused for a long time, are nevertheless slowly discharging. Gel cell batteries are generally more stable. Voltage readings should be taken before the charged batteries are taken into the field to be sure that they still have a full charge.

When a sampler, flow meter, or ancillary equipment needs more specific repairs, the manufacturer representative should be contacted and arrangements made for repair or replacement of the equipment.

Wastewater sampler set-up in traffic to obtain composite sample from a sewer manhole. Notice the tri-pod and barricades.

Common Wastewater Sample Collection Bottles

625/608, 1657, TTO/Organics, TPH/Oil/Grease,
Thin vials-TOCs, VOCs, 601/602 and 502.2
Be careful not to get air in the VOC/SVOC bottles.

NO_2/NO_3, Fluoride, Sulfide, Metals, BOD-TDS-TSS
Wide-mouth Sludge/Metals bottle

Laboratory

123 W. Main St
Sun City, Arizona 85541

LAB I.D. NUMBER

Sampler:

DATE:

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Company:
Department:
Address:
Contact:
Telephone:

Sample Identification	Date	Time	Matrix	Lab ID	Metals* See Attached	TSS	Lead/Copper	BOD/COD	Nitrate	Nitrate + Nitrite	TKN / Amonia	VOC / THM's	Semi Volital Organics (625)	Chloride		Cyanide	Floride	Surfactants (MBAS)	Tot. Coliform MPN	Fecal Coliform MPN-HPC	Organo-Phosphorus Pest. (8141)	Sulfate	EC Conductivity	Number/Containers

Project Name

Project Number

Field Measurements:

pH:

Temp:

Sample Receipt

No. Containers:

Custody Seals:

Received Intact: Yes No

Received Cold: Yes No

Temperature:

PRIORITY:

RELINQUISHED BY:

Signature: Time:

Printed Name: Date:

SAMPLED RECEIVED BY:

Signature: Time:

Printed Name: Date:

RELINQUISHED BY:

Signature: Time:

Printed Name: Date:

Company

SAMPLED RECEIVED BY:

Signature: Time:

Printed Name: Date:

Company

Wastewater Treatment Plant Sampling

POTW samples are collected in accordance with the National Pollutant Discharge Elimination System (NPDES) permit that sets discharge limits for certain pollutants and specifies sampling frequencies and sample types.

The POTW is responsible for coordinating the plant sampling activity with laboratory personnel who prepare any special sampling bottles and laboratory appurtenances necessary (i.e. trip blanks, etc.) to complete the sampling objectives.

Plant Sampling Procedure *(Example Procedure)*
Set up two samplers at the plant influent channel and two samplers at the plant effluent channel. Two samplers are used to provide sufficient sample quantity and to minimize sampler failure. All sampling equipment must be prepared and cleaned as established in your POTW's procedures. Teflon hose is required. Sampling sites are specified in each plant's NPDES permit.

Collect the following composite samples at both sites.

(1) **Metals Sample** - (one 2-liter plastic bottle)

Preserve with 1:1 nitric acid to a pH < 2. Store sample on ice at 4°C.

(2) **Cyanide Sample** – (one 2-liter plastic bottle)

Collect the cyanide sample as a composite in accordance with NPDES permit. Check the sample for chlorine. If Cl_2 is present, use ascorbic acid to eliminate it. Add NaOH to a pH > 12. Store samples on ice at 4°C.

(3) EPA Test Method 608 and 625 samples are informational samples only. These results are used for local limits data.

608 and 625 samples are collected as composite samples.
At the influent channel: Collect one 1-liter amber glass bottle of each sample (608, 625). Check samples for chlorine. At the effluent channel: Collect one 4-liter amber glass bottle of each sample (608, 625). Check samples for chlorine. If Cl_2 is present in the samples, use sodium thiosulfate ($Na_2S_20_3$) to eliminate it. Store samples on ice at 4°C.

(4) **625/Phenols** are collected as a grab sample. Collect one 4-liter amber glass bottle at the effluent channel only. Check the sample for chlorine. If Cl_2 is present, use sodium thiosulfate ($Na_2S_20_3$) to eliminate it. Store sample on ice at 4°C.

Bio-Solids Sampling *(Example Procedure)*

Bio-solids (dried sludge) samples are collected at POTWs.

Normally, bio-solid samples will be collected from the final storage area for dry sludge. The location of the dried bio-solids may vary based on the individual plants. Sampling frequency will be determined on an as needed basis and to comply with the EPA requirements.

All samples collected are grabs. All samples are collected using a sterile plastic scoop in order to avoid any contamination.

The following is a list of samples to be collected:

PARAMETER	CONTAINER
Helminth Ova & Enteric Virus	1 Qt Plastic Bag (Ziploc)
Metals +	500 ml Plastic Bottle
Nitrogen (total)	4 oz Glass Bottle
TOC (Total Organic Carbon)	4 oz Glass Bottle
Fecal Coliform	(autoclaved from lab)
6 hr hold time	500 ml Plastic Bottle

Sample Scheduling
An active file is maintained on each sampling location which contains historical data including past process discharge flow readings, water meter readings, sampling dates, and conditions of sampling site.

River Sampling Activities *(Example Procedure)*
When developing a sampling plan for river sampling, the following considerations must be observed:

(1) Sampling sites must meet the objectives of the program or study.

(2) At the sampling sites the river must be flowing freely and the sample must be as representative as possible of river flow at that site. Consideration of all safety factors must be observed.

(3) Samples must be collected midstream of the main channel at approximately two-thirds of the depth unless specific depths have been requested.

(4) All safety precautions must be observed during sampling which includes the use of harnesses, waterproof boots and other equipment.

Sewers *(Example Procedure)*
Sewer system and user rate sampling are conducted in manholes. General guidelines for selection of sampling locations include the following:

(1) Samples should be taken at points of high turbulent flow to ensure good mixing and prevent the deposition of solids.

(2) The sample location should be easily accessible and free of any major safety hazards.

(3) Sample lines should not be located where there is surface scum.

(4) If a flow study or a flow/proportional sampling event is required, make sure that the sewer pipe does not have a curve, a drop in the line or any obstructions. These would cause false readings.

Cleaning Automatic Samplers *(Example Procedure)*

Samplers, sample jars, grab beakers, and all other equipment used in collecting samples must be cleaned between their use at each site, to avoid the possibility of cross contamination. Latex or nitrile gloves should be worn to protect against infections and acid burns. The following steps should be taken to ensure the proper cleaning of the sampling equipment.

(1) Break down the sampler and lay the three components in a row.

(2) Place the strainers and weights in a plastic bucket.

(3) Set the glass composite jars and Teflon caps off to the side, to be cleaned separately from the samplers.

(4) Pour a small amount of diluted (1:128) O-Syl disinfectant and MICRO soap into each sampler component, the bucket containing the strainers and weights, and the composite jars.

(5) To clean the sampler components:

(a) Partially fill the sampler bases and cover with water.

(b) Use a brush to scrub the inside and outside of each sampling component. Using a small bottle brush, thoroughly scrub the inside of the intake tube and the float housing of the sampler head (these are critical areas since they come in contact with the sample).

(c) Rinse off the soap with fresh water.

(d) Stack each component so that it will dry quickly and thoroughly.

(e) Reassemble the sampler after the components are dry, and store it in the proper compartment of the sampling van. Leave the sampler lid loose so moisture won't be trapped.

(f) Clean the strainers and weights in the bucket. Empty the contents of the bucket and rinse the bucket, strainers, and weights. After they have dried, place them in the proper storage areas of the sampling van.

(g) Drain the wastewater tank of the sampling van into the sewer drain.

(h) Refill the fresh-water tank on the sampling van with potable water.

Sampler Bottle Cleaning and Preparation *(Example Procedure)*

(1) Fill each jar with O-Syl (same dilution as used in the sampler disinfection), MICRO soap, and fresh water.

(2) Thoroughly scrub the inside and outside of the jars until they are sparkling clean. Make sure that all oil and grease are removed.

(3) Rinse the jars with fresh water.

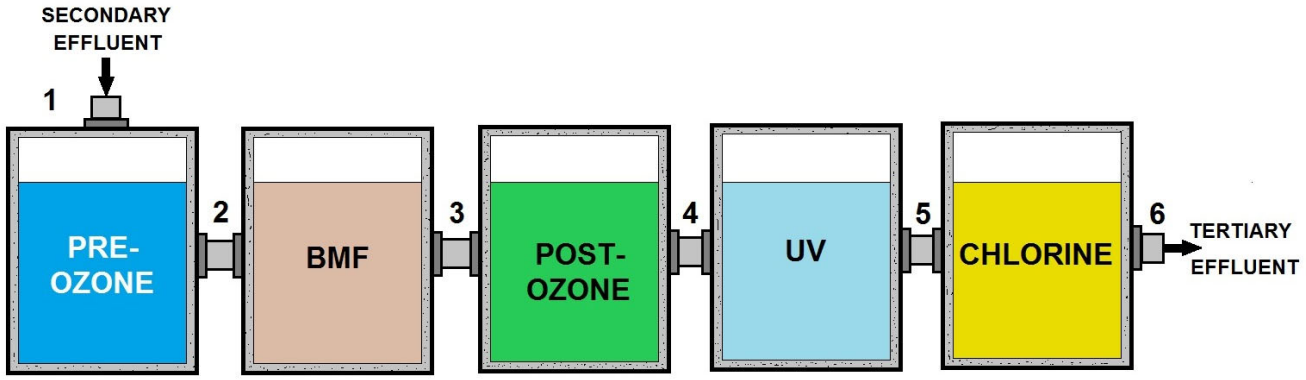
(4) Pour a small amount of 1:1 nitric acid into one jar, and securely place the proper Teflon cap on the jar. Swirl the nitric acid throughout the jar, remove the lid, and pour the nitric acid into the next jar. Repeat this procedure until all the bottles have been treated. Rinse bottles with water after the acid wash. **NOTE:** ***Wear safety glasses or a full-face shield to protect your eyes.***

(5) Place the jars in the drying oven. If the jars are to air dry, use Acetone to clean the bottles the same way as stated in (4) above. Let the jars and caps dry completely.

(6) Place the jars, with their caps on loosely, in their respective places in the sampling van.

Selection of Sampling Site

In order to ensure the collection of valid samples, a representative sampling site must be selected. For industrial sampling, the sites are designated in the permit.



TERTIARY TREATMENT PROCESS SAMPLING POINTS

Industrial Users - Permitted/Nonpermitted *(Example Procedure)*

The sampling points within an industry vary with each industry, depending on the nature of the process and location of pretreatment facilities. Therefore, exact locations must be identified on a case by case basis. However, the following general principles apply in all cases:

(1) A permanent sampling location(s) must be identified for use by the POTW and the IU.

All permitted industries are required to install a sampling vault. The location of the vault is designated by the enforcement inspector. The enforcement inspector responsible for an individual company or site is responsible for providing directions (maps) to the specific sampling points, as well as current copies of permits and the name of the contact person and phone number. This information needs to be kept current in the sampling file.

Locations of sampling points need to be compared to what is listed on the current permit. If sampling points that the POTW is using do not agree with permit location, do not sample and refer to Chief Inspector or Supervisor.

(2) The sampling location should be easily accessible and relatively free of safety hazards.

(3) For categorical industries, there should be, if possible, no discharge present other than that from the regulated process. If other wastestreams are combined with the regulated wastestream prior to the sampling location, the combined wastestream formula will need to be utilized. The sampling crew must be aware of lower limits to correctly show analysis on chain of custody.

(4) If the rate of industrial process discharge flow is needed (i.e., where mass limitations are applied), the sampling location will need to be located where the flow of the wastestream is known or can be measured or estimated and flow rates for the other wastestreams obtained.

(5) In instances where sampling must be performed in the sewer outside of the building, the IU must install a sampling vault in accordance with Code.

Sample Type and Analyses
Typical sample volumes are required for various analyses. In addition, the laboratory has developed standard volumes for routine analyses performed on industrial waste samples as follows:

(1) BOD/COD/TSS (1000-2000 ml, plastic)
(2) Heavy metals (500-2000 ml, plastic)
(3) Cyanide (2000 ml, plastic)
(4) Oil and grease (1000 ml, level-one glass)

Selection and Preparation of Sample Containers
The selection of a sample container is based on the parameter to be measured. The inspector should be familiar with the type of sampling containers and preservatives that are needed.

It is essential that the sample containers be made of chemically resistant material, and do not affect the concentrations of the pollutants to be measured. In addition, sample containers should have a closure (i.e., leak proof/resistant, Teflon lined) that protects the sample from contamination and should be properly labeled before leaving the sampling site.

QA/QC Field Procedures for Plant Sampling *(Example)*

Duplicate Sampling Procedure

The purpose of Duplicate Samples is to check the laboratory's ability to reproduce analytical results. Duplicate Samples are to be collected using these steps:

1. Determine amount of sample needed. If a flow proportion sample is required, then base the amount of sample needed on the current flow reading. If a flow-proportion sample is not required, then use the predetermined amount for the sampling site.
2. Collect sample using a grab type sampler or a sampling head.
3. Measure the amount determined in Step 1 using a graduated cylinder or other accurate measuring device.
4. Pour measured sample into sample container that is not marked as the Duplicate Sample.
5. Measure same amount as in Step 1.
6. Pour second measured quantity into sample container marked for Duplicate Sample.
7. Process both samples using standard procedures and submit both samples to laboratory.

Split Sampling Procedure

The purpose of Split Samples is to check analytical procedures by having the samples analyzed by two different laboratories. Split Samples are to be collected using these steps:

1. Determine amount of sample needed. If a flow proportion sample is required, then base the amount of sample needed on the current flow reading. If a flow-proportion sample is not required, then use the predetermined amount for the sampling site.
2. Collect sample using a grab type sampler or a sampling head.
3. Measure the amount determined in Step 1 using a graduated cylinder or other accurate measuring device.
4. Pour measured sample into sample container that is not marked as the Split Sample.
5. Measure same amount as in Step 1.
6. Pour second measured quantity into sample container marked for Split Sample.
7. Process both samples using standard procedures and submit both samples to the laboratory. The laboratory will be responsible for submitting the samples to the outside laboratory that will be analyzing the Split Sample.

Trip Blank Procedure

The purpose of Trip Blanks is to determine if the sample bottles have been adequately cleaned, and if sample contamination occurs between the time sample bottles leave the laboratory to the time that samples are returned to the lab.

Trip blanks are prepared by the laboratory using bottles supplied by the sampler. They are picked up by the person who begins the sampling day. Trip blanks are placed in the cooler which contains the other samples, and remain there until the samples are turned into the laboratory.

Sample Preservation

Wastewater usually contains one or more unstable pollutants that require immediate analysis or preservation until an analysis can be made. Sample preservation is needed for composite samples, for example, which may be stored for as long as 24 hours prior to transferring them to the laboratory. Recommended preservatives and holding times that should be used for specific pollutants are presented at the start of this Chapter.

Chain of Custody (COC)
Documentation of all pertinent data concerning the collection, preservation and transportation of samples is critical to the overall success of the Wastewater Sampling Program. If sampling is performed for the Pretreatment program, any sampling data may be used as evidence in court proceedings against a noncompliant industrial user. In this case, documentation becomes critical. The COC form is a legal document and is of major importance in a court hearing.

Specific procedures with regard to chain of custody are outlined below:

(1) The sampling crew takes a sufficient supply of prenumbered Industrial Waste Lab Reports, (custody forms) and sample containers into the field.

It is generally possible to fill out much of the form ahead of time, with the notable exceptions of the time of collection and the change in custody signatures.

a) TURN-AROUND TIME: Check box to indicate if results are needed on a rush basis or in standard turn-around time.
b) PROJECT #/NAME: The ID # or name assigned for the sampling event.
c) SITE ID #/NAME: For each sampling location.
d) DATE SAMPLED: From - Date sampling began. To - Date sample is pulled. If it is a grab sample, only the date the sample was taken will be entered with the other line crossed out.
e) COLLECTED: Date and Time. For a composite sample, the start, end, and total times are recorded.
f) MATRIX: Wastewater, DI water, etc.
g) SAMPLE TYPE: Grab or Composite (hand, flow, or time proportional).
h) SAMPLE BOTTLE: Material & Size
i) NUMBER OF CONTAINERS: Used for this sample.
j) PARAMETER: For example: Metals, Cyanide, O&G, VOC, etc. and,
k) TEST METHOD: Respectively: EPA 200.7, 4500-CN E, EPA 1664A, EPA 624, etc.
l) PRESERVATIVE: Codes for each preservative may be specified on the COC form.
m) NOTES to LAB: Includes any special notes to the lab, such as special analysis required of the sample, a letter code which is assigned to the entity being tested, the amount of flow if sample is flow proportional, grab sample pH and temperature, and/or actual sample temperature.
n) NOTES (Other): Should include the results of any field tests including pH and temperature.
o) COLLECTED BY: for the samplers initials and, if needed, the vehicle ID #.
p) RELINQUISHED BY: Signature w/Date & Time.
q) RECEIVED BY: Signature w/Date & Time.

(2) When a sample is taken the crew records the time of collection on the COC form.

Quality Assurance/Quality Control (*Example*)
Quality Assurance/Quality Control (QA/QC) measures taken by the sampling crew include equipment blanks, trip blanks, split samples and duplicate samples. Equipment blanks and trip blanks are routine QA/QC measures.

Split samples are taken for Local Limits sampling and when requested by an industry.

Split samples requested by an industry are analyzed by their lab at their expense.

Duplicate samples are run when requested by a Project Leader.

According to the EPA, the primary purpose of blanks is to trace sources of artificially introduced contamination. There are five types of blanks used to trace where contamination is introduced, three of which are used in the field and two are used the laboratory. https://www.epa.gov/sites/default/files/2015-06/documents/blanks.pdf

In addition, temperature blanks are sometimes used. Either laboratory staff or the sampling crew prepare the travel, trip, and/or temperature blanks needed for a sampling event.

Any contamination detected in the blanks would result from field exposure which could in turn affect collected samples.

Field Equipment Blank Procedure *(Example)*

The purpose of Field Equipment Blanks is to test the procedure for cleaning the sample measuring container to determine if cross contamination between sample sites has occurred. These Blanks are needed only at sites where flow-proportion samples are taken. Follow these steps when collecting a Field Equipment Blank:

1. Collect Field Equipment Blank **AFTER** collecting a sample and **BEFORE** moving to the next sampling location.
2. Open a sealed bottle of High Purity Water.
3. After collecting a sample, triple rinse the sample measuring container, usually a graduated cylinder, using High Purity water.
4. Pour the High Purity Water into the sample measuring container that was just rinsed.
5. Pour the High Purity water from sample measuring device into sample bottles labeled for the Field Equipment Blanks.
6. Repeat Steps 3 through 5 until all Field Equipment Blank sample bottles have been filled.
7. Process samples using standard procedures and submit to laboratory.

An equipment blank is high purity water which has been collected in a composite sample bottle or a series of discrete bottles from an automatic sampler. Equipment blanks are used to evaluate the reliability of composite samples collected in the field. The data produced from the equipment blank indicates the performance of the sample collection system, which involves the cleaning of sampling equipment, and accessories, preservation techniques, and handling of samples. The objective is to demonstrate that the samples are not contaminated by inadequate cleaning of equipment, contaminated preservation additives or sample collection techniques, and to provide documented records on Quality Assurance Practices.

Procedures to be followed in collecting the equipment blanks are outlined below. (Also see QA/QC check list, example).

(1) The sampler is to be assembled completely in the manner determined by the parameters the crew will be sampling (i.e. if sampling for organics, Teflon suction tubing must be used at that site). The composite jar inside the sampler must always be rinsed out thoroughly with high purity water.

(2) Program the sampler to collect the proper amount of high purity water that is representative of the sample parameters that will be collected at that site. Grab samples are excluded. Pump high purity water through the strainer and intake tubing prior to filling the sampler bottle. Then, place the strainer into as many fresh, uncontaminated bottles of high purity water as needed to collect the necessary volume of sample.

(3) If the sampler is set up in the discrete mode, the crew must then transfer the collected samples into the field composite bottle and shake to mix thoroughly.

(4) Transfer the sample from the field composite bottle into its respective lab sample bottles. Test and preserve the samples as appropriate for the parameters being analyzed.

(5) Follow the chain of custody procedures outlined in SOP for turning the samples in to the laboratory. All paperwork must be completed at this time, and all bottles must be marked accordingly. Custody seals must be used. The crew must note the sampling activity in a logbook that is kept specifically for documenting preparation of equipment blanks and/or any other QA activities.

Sampling Techniques *(Example)*

General Guidelines

In general, the following guidelines should be observed in conducting sampling activities:

(1) Samples being collected must be representative of the wastestream being tested.

(2) Samples shall be collected in uncontaminated containers and preserved properly.

(3) Samples should be of sufficient volume for the required analyses.

(4) Samples should be stored in a manner which does not alter the properties of the sample prior to chain of custody transfer.

(5) Samples should be properly and completely identified by marking them with the proper information.

(6) Sample lines should be as short as possible and the smallest practical diameter to facilitate purging, reduce lag time, and give adequate consideration to maximum transport velocity. Also, they should have sufficient strength to prevent structural failure.

(7) Sample lines should be pitched downward at least 10 percent to prevent settling or separation of solids contained by the sample.

(8) Samples should be delivered as quickly as possible to the laboratory.

Specific Techniques

Sampling techniques in addition to the above general guidelines must also recognize differences in sampling methodology, preservation, and analytical methods.

The following sections specify techniques that differ by pollutant group and discuss such factors as sampling methodology (e.g., composite, grab, etc.), type of container, preservation and holding time.

Sampling Techniques for Volatile Organics *(Example)*

Volatile organics are analyzed in accordance with EPA methods 601, 602, 603 and 624.

Due to the volatility of these compounds, only grab samples can be taken. If a composite sample is needed, individual grab samples must be collected and composited in the laboratory prior to analysis.

The procedures that must be followed in taking these samples are outlined below.

NOTE: Gloves, clothing, face, and eye protection must be worn when handling volatile organics. In addition, the sampling crew must thoroughly clean those parts of the body that have been exposed to these materials.

(1) For each sampling date, the lab will also provide two additional bottles to be used as a backup in case of breakage. These sampling vials are only good for one week. If any are unused, they must be returned to the lab for disposal.

(2) The lab will provide one sample trip blank per sampling date. This bottle is to be kept on ice until the samples are submitted to the lab. At least one day prior to sampling, go to the lab and request the sample bottles (40 ml vials) for the specific sampling site, as indicated by the sampling plan. The laboratory will arrange to have the appropriate number of sample bottles prepared, based on the number of analyses to be performed. The sampling crew should make sure that all bottles are provided for these samples by the lab technicians.

(3) Collect the sample in a clean glass beaker. Test for chlorine with the Hach test kit. If there is any chlorine residual, neutralize the chlorine with sodium thiosulfate ($Na_2S_2O_3$) and retest for chlorine. Repeat until there is no chlorine residual. Make notes on chain of custody sheet if extra amounts of sodium thiosulfate are required for neutralization.

(4) Remove the vials from the ice. There will be two empty vials for the 601 sample and two vials with HCl for the 602. The HCl will already have been measured into the vials by the lab personnel.

(5) Fill the vial to just overflowing in such a manner that no air bubbles pass through the sample as the vial is being filled. This is accomplished by pouring the sample from the beaker into the vial along the side of the vial to minimize the possibility of entrapping air in the sample. Do not rinse out or overfill the vials, this will wash out the preservative in the vial.

(6) Seal the vial so that no air bubbles are entrapped in it. Remember to put the Teflon side of the cap facing down onto the vial.

(7) To be sure there are no air bubbles, turn the vial upside down and tap it against the palm of the hand. Check to see if there are air bubbles along the sides or bottom of the vial. If there are bubbles, unseal the vial, top off the vial, and reseal. Check the vial again for the presence of bubbles.

(8) All samples must be maintained at 4°C from the time of collection until the time of extraction. Custody seals must be placed on all samples, and all paper work must be filled out properly.

(9) Return the sample bottles and QA/QC bottles to the laboratory the same day the sample is collected.

Acid/Base/Neutral Extractable Organics and Pesticides

Acid extractable organics are analyzed in accordance with EPA methods 604 and 625. Base/neutral extractable organics are analyzed in accordance with EPA method 625, or individual methods for various groups of compounds including EPA methods 605, 606, 607, 609, 611, and 612. Pesticides are analyzed in accordance with EPA method 608.

The procedures that must be followed in taking these samples are outlined below.

(1) Samples must be collected in certified clean one-gallon amber glass bottles with Teflon lids.

(2) No travel blanks or QA/QC bottles are required with the samples.

(3) Grab samples must be collected in amber glass bottles. They do not have to be completely filled, but must be a minimum of 1/3 to 1/2 full. Bottles should not be prewashed with samples prior to filling.

(4) For composite sampling, glass composite bottles must be used and precleaned. Teflon tubing must be used for the suction piping. The pump tubing must be medium grade silicone rubber.

(5) The composite bottle in the sampler must be kept refrigerated (putting ice in the sampler) at 4°C. If amber glass is not used (i.e. 2 1/2-gallon clear composite sampler bottle), the sample must be protected from the light during collection and compositing. The compositing must be done in the field (i.e. when discrete sampling has been used).

(6) All samples must be iced at 4°C from the time of collection until extraction.

(7) The sample should be checked for the presence of chlorine using field test kits that provide results in accordance with EPA methods 330.4 and 330.5. If chlorine is determined to be present, 80 mg of sodium thiosulfate should be added to each bottle. The sample must be retested for chlorine. This procedure must be repeated until there is no residual of chlorine shown. The amount of sodium thiosulfate added must be noted on the chain of custody if in excess of 80 mg.

(8) All necessary paperwork must be completed at sampling site. All bottles must be properly labeled, and have custody seals.

Toxic - Heavy Metals Sub-Section

Heavy metals, also known as trace metals, are one of the most persistent pollutants in wastewater. The discharge of high amounts of heavy metals into water bodies leads to several environmental and health impacts. The exposure of humans to heavy metals can occur through a variety of routes, which include inhalation as dust or fume, vaporization and ingestion through food and drink. Some negative impacts of heavy metals to aquatic ecosystems include death of aquatic life, algal blooms, habitat destruction from sedimentation, debris, increased water flow, other short and long term toxicity from chemical contaminants.

Abundant amounts of heavy metals present in soils cause reduction in quality and quantity of food preventing plants' growth, uptake of nutrients, physiological and metabolic processes. Severe effects on animals may include reduced growth and development, cancer, organ damage, nervous system damage, and in extreme cases, death. To help mitigate the negative impacts of heavy metals on the health of humans, animals and the environment, a variety of remediation processes exists. These remediation processes are broadly classified into chemical and biological, although the latter is advocated in recent years.

Biological remediation processes (microbial remediation and phytoremediation) are indicated to be very effective in the treatment of heavy metal pollutants in wastewater. Microbial remediation is the restoration of the environment and its quality using microorganisms, such as bacteria, fungi, protozoan and algae while phytoremediation is the use of plants to degrade or accumulate toxic metals, thereby leading to a reduction in the bioavailability of the contaminant in the soil or water.

Heavy metal concentrations from industrial wastewater pollution such as zinc, copper, nickel and chrome, has sparked major environmental compliance initiatives. For this purpose, government agencies established industry compliance standards for metal-contaminated wastewater discharge into municipal sewage treatment plants, and hazardous metal waste solids into landfills.

Industrial metal pollutants that include, but are not limited to:

- Aluminum
- Antimony (a metalloid)
- Arsenic is a metalloid
- Barium
- Beryllium
- Cadmium
- Copper
- Ferric (Iron / Iron Oxide)
- Hexavalent & Trivalent Chrome
- Lead
- Mercury - mercury poisoning
- Molybdenum
- Nickel / Electroless Nickel
- Osmium
- Selenium
- Silver
- Thallium
- Vanadium
- Zinc / Zinc Phosphate

Radioactive metals:

- Actinium
- Thorium
- Uranium
- Radium
- The transuraniums, such as plutonium, americium, etc.
- Polonium
- Radioactive isotopes of metallic elements not otherwise strongly toxic, e.g. cobalt-60 and strontium-90.

Aluminum

Aluminum has no biological role and its classification into toxic metals is controversial. Significant toxic effects and accumulation to tissues have been observed in renally impaired patients. However, individuals with healthy kidneys can be exposed to large amounts of aluminum with no ill effects. Thus, aluminum is not considered dangerous to persons with normal elimination capacity.

Trace Elements with Toxicity

- Chromium as hexavalent Cr(VI)
- Nickel – nickel salts are carcinogenic
- Copper – copper toxicity
- Zinc - zinc toxicity
- Iron – iron poisoning
- Fluorine-fluoride poisoning

Non-metals

Some heavy nonmetals may be erroneously called "metals", because they have some metallic properties.

- Selenium – a nonmetal; essential element
- Tellurium

Atomic Spectrometry

Atomic spectrometry converts each metal in the water sample to a particulate emission that can then be weighed. Extrapolations are made to determine each metal concentration in each water sample taken. The complicated analysis requires preserving the sample with acid, heating the sample to convert to a particulate emission and then identifying each metal and its weight.

A simple analogy is to capture the steam from a pot of water, separate every atom in the steam, identify each atom, weigh each atom and then apply these numbers back to the original volume of water contained in the pot. The result is an accurate picture of what is in the water.

Heavy Metals in Water

High heavy metals concentrations can be naturally occurring. Every geologic formation contains a certain amount of heavy metal. Mine operations extract and process these metals in areas with the highest concentrations. Water in these areas may have high metal concentrations due to the combination of naturally occurring deposits and mine waste.

Water samples are usually taken randomly within a contaminated area and offsite to identify the source of contamination and the pathway it travels, into the drinkable groundwater system or away from potable water sources. Accurate determination of heavy metal contamination is important to identify cumulative risks to people drinking water derived from these areas.

Sampling Techniques for Heavy Metals *(Example)*

(1) Generally, all metal samples collected are to be composite samples, i.e., flow/composite, time/composite, or hand composite.

(2) For composite sampling, place the lid on the bottle and agitate the bottle to completely mix the composite sample.

(3) Transfer the required amount from the composite container to either a 500 ml or 2000 ml clean plastic bottle. Check the pH of the sample.

Note: For inductively coupled plasma (ICP) metal analysis, a 500 ml clean plastic bottle is required. For extra metals or metals by furnace, a 2000 ml clean plastic bottle is required.

(4) Add nitric acid (1:1 solution) to the sample to reduce the pH to below 2.0. Usually, 2 ml/500 ml is sufficient. Recheck the pH to be sure it is below 2.0. Make a note on the lab sheet if more than two ml of acid is required to bring the pH below 2.0.

(5) Label the sample bottle with the corresponding IW number and proper analysis code letter. Attach the custody seal to the sample, then store in the ice chest until transferred to the laboratory. Fill out the IW lab sheet with all the pertinent information, being careful to include all required parameters and the type of analysis required, e.g., ICP/furnace.

(6) When a grab sample is necessary, rinse out the receiving sample bottle with an aliquot of the sample stream at least three times. Then fill the sample bottle and proceed with steps two through four described above.

(7) When a split sample is requested (i.e., one for the samplers and one for the user), the composite sample is prepared as described in item one. Providing there is sufficient sample, a portion is transferred into the bottle provided by the user.

(8) If more than one site is sampled per day, a clean composite container (i.e., two and one half-gallon glass jar), must be used at each site.

(9) If a discrete sampler is being used, at the time of collection combine all the samples that have been collected into a single clean composite bottle. Then follow the preceding steps one through four, and refer to step six if a split is requested.

Cyanide *(Example)*

To assure that the sample can be analyzed for cyanide, no chlorine can be present in the sample. Procedures for taking cyanide samples are as follows:

(1) This sample is normally a grab sample. The cyanide sample is a composite sample when collected as part of Priority Pollutants or Plant Sampling at the waste treatment plants.

(a) In the sampling file, check the industries' wastewater discharge permit and locate all cyanide (CN) sampling sites. If the sampling sites are located in a confined space, follow Confined Space procedures before collecting the sample or samples.

(b) Collect 2000 ml (maximum), 1000 ml (minimum), of CN sample into a type C plastic bottle.

NOTE: 2000 ml is the standard, but for batch dischargers 1000 ml is adequate.

(c) Test the cyanide sample for pH and temperature with the pH meter. Record the results on the custody sheet (Industrial Waste (IW) lab sheet).

(d) Test for chlorine with a Hach Total Chlorine Test Kit (the instructions are located in the kit)

(e) If chlorine is present in the CN sample, neutralize it with Ascorbic Acid ($C_6H_8O_6$). For ascorbic acid neutralization, add $C_6H_8O_6$, a few crystals at a time, until five mls of sample in the test tube produces no color. Then add an additional 0.06 g of $C_6H_8O_6$ for each liter of sample volume.

(f) Once all Cl_2 has been neutralized, preserve the sample with Sodium Hydroxide (NaOH) and raise the pH to >12. Verify the >12 pH with a pH meter or pH test strips.

(g) Mark on the side of the CN sample bottle the IW Lab sheet number (using a water proof marker), and place a corresponding custody seal across the sample bottle tightened cap. Place a Cyanide label on the bottle if cyanide is suspected of being present in the sample.

(h) Store the CN sample in the ice at 4°C and transport it to the laboratory.

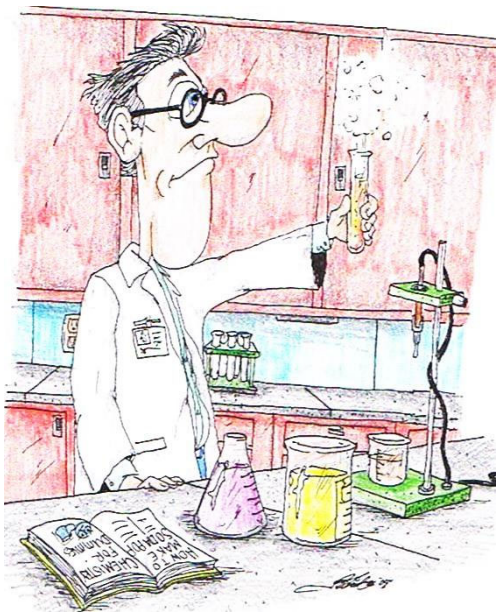
Total Sulfides *(Example)*

(1) The Total Sulfide sample is collected as a grab sample only. Use a clean 500 ml plastic bottle to collect the sample. This sample may be pumped into the sample container or collected directly from the discharge side of the sampling device.

(2) Preserve the sample with 1 ml of 2N Zinc Acetate ($C_4H_6O_4Zn$) and then add Sodium Hydroxide (NaOH) to raise the pH > 9.

(3) Label and seal the sample with a custody seal. Cool to 4°C.

Oil and Grease/TPH *(Example)*



EPA Method 1664A
Extraction of Oil and Grease from Water Samples Using Solid-Phase Extraction (SPE) Disk Configuration

Oil and Grease Disc Configuration Method
Acidify each 1L sample to pH < 2 using 6 M of HCl.

Place required number of samples (1–6) in the sample vial rack. Insert sample lines into each sample bottle.

Collection
Label the collection vials (1–6) and place these into the collection rack. Position the solvent bottles on the left side of the Dionex AutoTrace instrument.

Solvents
Add methanol to solvent bottle
1. Water (pH 2) to solvent bottle
2. Hexane/THF (1:1) to solvent bottle
3. Hexane to solvent bottle
4. And water to solvent bottle
5. Place these solvent bottles to the left side of the Dionex AutoTrace instrument and insert the solvent lines into the corresponding bottle (up to five different solvents can be used with the Dionex AutoTrace instrument). SPE Media Insert SPE disks onto the Dionex AutoTrace instrument (see Dionex (now part of Thermo Scientific) AutoTrace 280 Operation Manual for details1) and secure the disk into place using the disk holder. The green LED will be illuminated when the disk is locking into place.

METHOD 413.1 (Oil and Grease). Is no longer a valid procedure.

BOD/COD/SS *(Example)*

(1) 24-hour composite sampling is always used for this test. Agitate the bottle to completely mix the composite sample. Do not allow the solids to settle out before you pour off the sample.

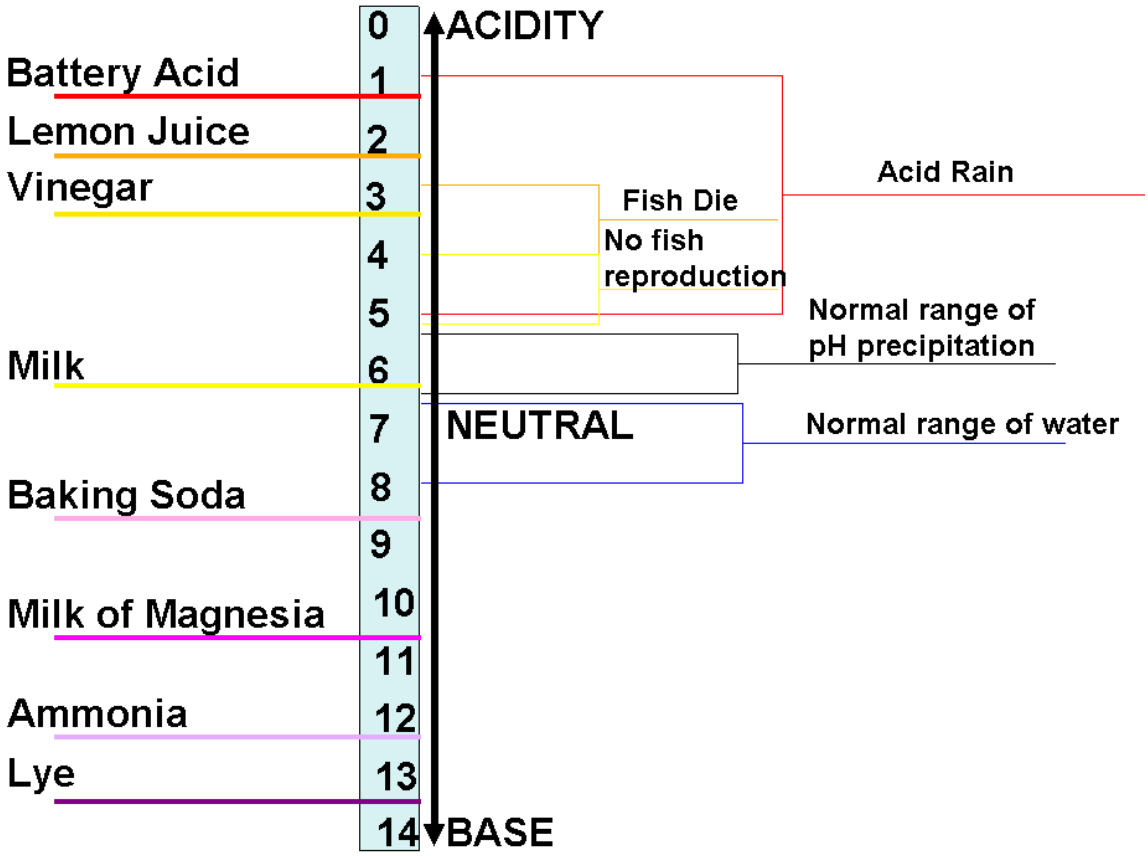
(2) When more than one sample is being taken from a composite bottle, the BOD/COD/SS is taken first. The lab needs 1000 ml if the sample is cloudy or has solids. If the sample is clear, you must collect 2000 ml. Transfer the appropriate volume to the sample bottle.

(3) Take the pH/temperature of the sample with either pH paper and a thermometer, or the pH meter carried on the sampling trucks.

(4) Label the sample bottle and place a custody seal over the lid. Store at 4°C.

(5) Should split samples be requested, they are only supplied when it is sure there is enough sample for POTW's requirements. Users must provide their own sample containers and allow POTW's staff to pour off samples.

pH Scale



pH: A measure of the acidity of water. The pH scale runs from 0 to 14 with 7 being the mid-point or neutral. A pH of less than 7 is on the acid side of the scale with 0 as the point of greatest acid activity. A pH of more than 7 is on the basic (alkaline) side of the scale with 14 as the point of greatest basic activity.

pH = (**Power of Hydroxyl Ion Activity**).

The acidity of a water sample is measured on a pH scale. This scale ranges from **0** (maximum acidity) to **14** (maximum alkalinity). The middle of the scale, **7**, represents the neutral point. The acidity increases from neutral toward **0**.

Because the scale is logarithmic, a difference of one pH unit represents a tenfold change. For example, the acidity of a sample with a pH of **5** is ten times greater than that of a sample with a pH of **6**. A difference of 2 units, from **6** to **4**, would mean that the acidity is one hundred times greater, and so on.

Normal rain has a pH of **5.6** – slightly acidic because of the carbon dioxide picked up in the earth's atmosphere by the rain.

Dissolved Oxygen

More on this sample in the Laboratory Analysis Chapter located in the rear of this course

Dissolved oxygen (**DO**) in water is not considered a contaminant. However, the (DO) level is important because too much or not enough dissolved oxygen can create unfavorable conditions. Generally, a lack of (DO) in natural waters creates anaerobic conditions. Anaerobic means without air. Certain bacteria thrive under these conditions and utilize the nutrients and chemicals available to exist. *Under anaerobic conditions the reaction is:*

Anaerobic:

Organics-→ intermediates + CO_2 + H_2O + energy

Where the intermediates are butyric acid, mercaptans and hydrogen sulfide gas. At least two general forms of bacteria act in balance in a wastewater digester. Saprophytic organisms and Methane Fermenters. The saprophytes exist on dead or decaying materials. The methane fermenters live on the volatile acids produced by these saprophytes. The methane fermenting bacteria require a pH range of 6.6 to 7.6 to be able to live and reproduce.

Aerobic:

Organics + Oxygen-→ CO_2 + H_2O + energy

Aerobic conditions indicate that dissolved oxygen is present. Aerobic bacteria require oxygen to live and thrive. When aerobes decompose organics in the water, the result is carbon dioxide and water. Dissolved Oxygen in a water sample can be detrimental to metal pipes in high concentrations because oxygen helps accelerate corrosion. Oxygen is an important component in water plant operations. Its primary value is to oxidize iron and manganese into forms that will precipitate out of the water. It also removes excess carbon dioxide. The amount of dissolved oxygen in a water sample will affect the taste of drinking water also.

Methods of Determination

There are two methods that we will be using in the lab. The membrane electrode method procedure is based on the rate of diffusion of molecular oxygen across a membrane. The other is a titrimetric procedure (Winkler Method) based on the oxidizing property of the (DO). Many factors determine the solubility of oxygen in a water sample. Temperature, atmospheric pressure, salinity, biological activity and pH all have an effect on the (DO) content.

Iodometric Test

The Iodometric (titration) test is very precise and reliable for (DO) analysis of samples free from particulate matter, color and chemical interferences. Reactions take place with the addition of certain chemicals that liberate iodine equivalent to the original (DO) content. The iodine is then measured to the starch iodine endpoint. We then calculate the dissolved oxygen from how much titrate we use. Certain oxidizing agents can liberate iodine from iodides (positive interference), and some reducing agents reduce iodine to iodide (negative interferences). The alkaline Iodide-Azide reagent effectively removes interference caused by nitrates in the water sample, so a more accurate determination of (DO) can be made.

Methods of analysis are highly dependent on the source and characteristics of the sample. The membrane electrode method involves an oxygen permeable plastic membrane that serves as a diffusion barrier against impurities, only molecular oxygen passes through the membrane and is measured by the meter. This method is excellent for field testing and continuous monitoring. Membrane electrodes provide an excellent method for (DO) analysis in polluted, highly colored turbid waters and strong waste effluents. These interferences could cause serious errors in other procedures. Prolonged usage in waters containing such gases as H_2S tends to lower cell sensitivity. Frequent changing and calibrating of the electrode will eliminate this interference.

Samples are taken in BOD bottles where agitation or contact with air is at a minimum. Either condition can cause a change in the gaseous content. Samples must be determined immediately for accurate results. The dissolved oxygen test is the one of the most important analyses in determining the quality of natural waters. The effect of oxidation wastes on streams, the suitability of water for fish and other organisms and the progress of self-purification can all be measured or estimated from the dissolved oxygen content. In aerobic sewage treatment units, the minimum objectionable odor potential, maximum treatment efficiency and stabilization of wastewater are dependent on maintenance of adequate dissolved oxygen. Frequent dissolved oxygen measurement is essential for adequate process control.

Terms:

Aerobic (AIR-O-bick) a condition in which free or dissolved oxygen is present in the aquatic environment.

Aerobic Bacteria – (aerobes) bacteria which will live and reproduce only in an environment containing oxygen. Oxygen combined chemically, such as in water molecules (H_2O), cannot be used for respiration by aerobes.

Anaerobic (AN-air O-bick)- a condition in which ***"free"*** or dissolved oxygen is not present in the aquatic environment.

Anaerobic Bacteria – (anaerobes) bacteria that thrive without the presence of oxygen.

Saprophytic bacteria – bacteria that break down complex solids to volatile acids.

Methane Fermenters – bacteria that break down the volatile acids to methane (CH_4), carbon dioxide (CO_2) and water (H_2O).

Oxidation – the addition of oxygen to an element or compound, or removal of hydrogen or an electron from an element or compound in a chemical reaction. The opposite of reduction.

The analytical laboratory provides both qualitative and quantitative information for determining the extent of permittee compliance with permit discharge requirements. To be valuable or useful, the data must be representative and accurately describe the characteristics and concentrations of constituents in the samples submitted to the laboratory. The objectives of laboratory Quality Assurance (QA) are to monitor and document the accuracy and precision of the results reported and to meet reliability requirements. QA refers to a total program for ensuring the reliability of data by utilizing administrative and technical procedures and policies regarding personnel, resources, and facilities.

QA is required for all functions bearing on environmental measurements and includes activities such as project/study definition; sample collection and tracking; laboratory analysis; data validation, analysis, reduction, and reporting; documentation; and data storage systems. Thus, the QA program is designed to evaluate and maintain the desired quality of data. Quality Control (QC), a function of QA, is the routine application of procedures for controlling the accuracy and precision of the measurement process and includes the proper calibration of instruments and the use of the appropriate analytical procedures.

The regulations at Title 40 of the *Code of Federal Regulations* (CFR), section 122.41(e) (conditions applicable to all permits), requires adequate laboratory and process controls, including appropriate QA/QC procedures. Each permittee's laboratory must have a QA/QC program. The laboratory must document the QA/QC program in a written QA/QC manual and the laboratory should make it available to all personnel responsible for sample analyses. The manual must clearly identify the individuals involved in the QA program and document their responsibilities. The laboratory's standard operating procedures must meet user requirements in terms of specificity, completeness, precision, accuracy, representativeness, and comparability of the required testing procedures. The laboratory should devote approximately 10 to 20 percent of their resources to their QA/QC program.

Guidance in this chapter is broad-based and may not be applicable to every laboratory. This chapter includes a Laboratory Quality Assurance Checklist for the inspector's use at the end of the chapter. For detailed information concerning laboratory QA/QC, refer to Environmental Protection Agency's (EPA's) *Handbook for Analytical Quality Control in Water and Wastewater Laboratories* (EPA, 1979) and EPA's *National Pollutant Discharge Elimination System (NPDES) Compliance Monitoring Inspector Training Module: Laboratory Analysis* (EPA, 1990). If a more detailed assessment of a laboratory is required, personnel with more extensive knowledge of the methodologies should perform the inspection.

Sample Handling Procedures

Evaluation of Permittee Sample Handling Procedures

Proper sample handling procedures are necessary in the laboratory from the sample's receipt to its discard. Sample handling procedures for small permittees may differ from procedures for larger permittees because staff organizational structures and treatment facility designs vary from one facility to the next. However, proper sample handling procedures should be standardized, utilized and documented by all permittees. In evaluating laboratory sample handling procedures, the inspector should verify the following:

- The laboratory area is secure and restricts entry to authorized personnel only.
- The laboratory has a sample security area that is dry, clean, and isolated; has sufficient refrigerated space; and can be locked securely.
- The laboratory has a sample custodian and a back-up custodian.
- The custodian receives all incoming samples, signs the chain-of-custody record sheet accompanying the samples, and locks the samples in the sample security area refrigerator.
- The custodian ensures that samples are properly stored.

• The custodian performs or analyzes checks of proper preservation, container type, and holding times and documents the results.
• The custodian distributes and retrieves samples to and from personnel who perform the analyses (i.e., analysts) and documents the transfer of the samples in the chain-of-custody record, which is retained as a permanent record. The chain-of-custody record typically identifies the sample identification number, sample collection date and time, sample type, sample location, sample volume, and preservatives.
• The custodian and analysts ensure the minimum possible number of people handle the samples.
• The custodian only disposes of samples and records upon direction from the laboratory director, in consultation with previously designated enforcement officials, when it is certain that the information is no longer required or that the samples have deteriorated.

Laboratory Analyses Techniques Evaluation
Evaluation of Permittee Laboratory Analytical Procedures
The permittee's laboratories or its contract laboratories must use uniform methods, thus, eliminating methodology as a variable when data are compared or shared among laboratories. The permittee's laboratory must consult 40 CFR Part 136 for the alternative methods approval process. A permittee may only use alternative test procedures if the procedures have EPA approval, as specified by 40 CFR 136.4 and 136.5, and promulgated under Public Law (PL) 92-500.

Many standardized test procedures promulgated under 40 CFR Part 136 are covered in EPA's *Methods for Chemical Analysis of Water and Wastes* (EPA, 1983) and the latest accepted edition of *Standard Methods for the Examination of Water and Wastewater* (American Public Health Association (APHA), American Water Works Association (AWWA), and Water Environment Federation (WEF), 2013). Revisions and new additions to this manual are made whenever new analytical techniques or instruments are developed. These are considered accepted after final publication in the Federal Register.3 Other approved methods from United States Geological Survey (USGS), American Society for Testing and Materials (ASTM), and several commercial vendor methods are also referenced in 40 CFR Part 136.

In evaluating laboratory analytical procedures, the inspector should verify the following:
• The laboratory personnel follow analytical methods specified in the most current 40 CFR Part 136.
• The laboratory personnel properly perform any deviations allowed by 40 CFR Part 136 and maintain documentation of any EPA-approved deviation from specified procedures.
• The laboratory personnel follow QA/QC procedures that conform to the procedures specified in the permit, analytical method, or methods compendium for approved 40 CFR Part 136 methods from a consensus organization. For example, the Standard Methods for the Examination of Water and Wastewater (APHA, AWWA, and WEF) contains QA/QC procedures.
• The laboratory personnel maintain a QA/QC record on reagent preparation, instrument calibration and maintenance, incubator temperature, and purchase of supplies.

Enforcement Section

In addition to requirements for permitting, sampling, and inspecting IUs, the General Pretreatment Regulations also require Control Authorities to review IU reports and plans, and respond to instances of IU noncompliance in a timely, fair, and consistent manner. Enforcement of pretreatment requirements is a critical element of the Pretreatment Program, but in the past extenuating circumstances may have prevented POTWs from taking adequate enforcement.

For example, political and economic pressures from local officials could keep POTW personnel from taking appropriate actions. After this was identified as a major concern, the EPA promulgated regulations in 1990 *(55 FR 30082*) that require all POTWs with approved pretreatment programs to adopt and implement an Enforcement Response Plan (**ERP**).

These ERP regulations, at 40 CFR §403.8(f)(5), established a framework for POTWs to formalize procedures for investigating and responding to instances of IU noncompliance. With an approved ERP in place, POTWs can enforce against IUs on a more objective basis and minimize outside pressures.

IU Compliance

To evaluate IU compliance, Control Authorities must first identify applicable requirements for each IU. In general, IU reports (discussed in Chapter 5) and POTW monitoring activities are the basis for POTW evaluation of IU compliance. Discharge permit limit exceedances, discrepancies, deficiencies, and lateness are all violations that must be resolved.

To ensure enforcement response is appropriate and the Control Authority actions are not arbitrary or capricious, the EPA strongly recommends that an Enforcement Response Guide (**ERG**) be included as part of the approved ERP. The ERG identifies responsible Control Authority officials, general time frame for actions, expected IU responses, and potential escalated actions based on:

- The nature of the violation
- Pretreatment standards
- Reporting (late or deficient)
- Compliance schedules
- Magnitude of the violation
- Duration of the violation
- Frequency of the violation (isolated or recurring)
- (potential) impact of the violation (e.g., interference, pass through, or POTW worker safety)
- Economic benefit gained by the violator
- Attitude of the violator

How Complete is Your ERG?

Q: Is a Control Authority response required for all violations identified?

Q: Is the IU notified by the Control Authority when a violation is found?

Q: Is the IU required to respond to each violation with an explanation and, as appropriate, a plan to correct the violation within a specified time period?

Q: Where noncompliance continues and/or the IU response is inadequate, does the Control Authority's response become more formal and commitments (or schedules, as appropriate) for compliance established in an enforceable document?

Q: Is the enforcement response selected related to the seriousness of the violation?

Q: Where the violation constitutes SNC, and is ongoing, is the minimum response an administrative order?

The types of questions that dictate whether an ERP is adequate are presented above. Factors that should be considered in determining appropriate enforcement responses to noncompliance events are discussed in detail in the EPA's 1989 *Guidance for Developing Control Authority Enforcement Response Plan*s.

The General Pretreatment Regulations set as an enforcement priority, facilities that meet the criteria for "***Significant Noncompliance*** (**SNC**)" as defined in 40 CFR §403.8(f)(2)(vii) and depicted in Figure 27. A decision to seek formal enforcement is generally triggered by an unresolved instance of SNC, failure to achieve compliance in a specified time period through less formal means, or the advice of legal counsel.

SNC evaluations are to be conducted in six-month increments; names of IUs found to be in SNC must be published in the local newspaper (see Public Participation in this Chapter).

Formal enforcement must be supported by well-documented records of the violations and of any prior efforts by the Control Authority to obtain compliance. Where effluent limitations have been exceeded, records must be reviewed to verify compliance with 40 CFR Part 136 test methods. If the IU has received conflicting information from the Control Authority regarding its compliance status, its status must be clarified in writing.

Although not required, the Control Authority may consider a "**show cause**" meeting with the IU before commencing formal enforcement action. Similarly, the regulations do allow, in certain instances, an affirmative defense for violations. The range of enforcement mechanisms available to a Control Authority depends on the specific legal authorities it has been given by city, county, and State legislatures. These mechanisms may range from a simple telephone call to suits seeking significant criminal penalties. Common enforcement mechanisms include:

Informal notice to IU - This may consist of a telephone call or "***reminder***" letter to an appropriate IU official to notify them of a minor violation and to seek an explanation.

Such informal notice may be used to correct minor instances of noncompliance.

Administrative Tools

Informal meetings - Used to obtain an IU's commitment to comply with their pretreatment obligations or to inform the IU of stronger enforcement mechanisms available for unresolved and/or continued, noncompliance.

Warning letter or Notice of Violation (NOV) - Written notice to the IU in response to a violation of pretreatment standards or requirements. These notices should request an explanation of the noncompliance and measures that will be taken to eliminate future violations.

Administrative orders and compliance schedules - These require an IU to "**show cause**" to the Control Authority as to why formal enforcement action should not be taken and/or sewer service discontinued, or actions that will be taken to comply with pretreatment standards or requirements. Orders as such may be negotiated (i.e., Consent Order) or issued at the reasonable discretion of the Control Authority (i.e., Compliance Order).

For more egregious or serious violations, the Control Authority may issue a Cease and Desist Order.

Administrative fines - Assessed by Control Authorities against IUs for violations and intended to recapture partial or full economic benefit for the noncompliance and to deter future violations.

Civil suits - Formal process of filing lawsuits against IUs to correct violations and to obtain penalties for violations. Civil penalty amounts are generally limited through State or municipal laws. However, 40 CFR §403.8(f)(1)(vi) requires that Control Authorities have the legal authority to seek or assess civil or criminal penalties of at least $1,000 per day for each violation.

A civil suit for injunctive relief may be used when the IU is unlikely to successfully execute the steps that the Control Authority believes are necessary to achieve or maintain compliance, when the violation is serious enough to warrant court action to deter future similar violations, or when the danger presented by an IU's lengthy negotiation of a settlement is intolerable.

NOTE: Surcharges are not penalties or fines. Surcharges are intended to recoup the cost of treatment of wastes by the POTW and must not be used to allow discharges of toxic pollutants that cause interference or pass through.

Definition of Significant Noncompliance (SNC) An IU is in SNC if its violation meets one or more of the following criteria (40 CFR 403.8(f)(2)(vii):
(A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed **(by any magnitude)** the daily maximum limit or the average limit for the same pollutant parameter;
(B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD 5 , TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);
(C) Any other violation of a pretreatment effluent limit (**daily maximum or longer-term average**) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);
(D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under 40 CFR § 403.8(f)(1)(vi)(B) of this section to halt or prevent such a discharge;

(E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
(F) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
(G) Failure to accurately report noncompliance;
(H) Any other violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

Criminal Prosecution

This type of enforcement is a formal judicial process where sufficient admissible evidence exists to prove beyond a reasonable doubt that a person has willfully or negligently violated pretreatment standards or that a person has knowingly made a false statement regarding any report, application, record, or other document required by the General Pretreatment Regulations.

As noted above, Control Authorities must have the legal authority to seek or assess civil or criminal penalties of at least $1,000 per day for each violation. Examples of criminal violations include falsification of data and tampering with sampling results or equipment.

Termination of service (revocation of permit) - These actions may be pursued by Control Authorities to immediately halt an actual or threatened discharge to the POTW that may represent an endangerment to the public health, the environment, or the POTW. Use of these remedies may also be used in bringing recalcitrant users into compliance.

Regardless of the response taken, the Control Authority should document and track all contact, notices, and meetings with IUs and IU responses. Control Authority responses and IU responses (or lack thereof) should be documented and include a record of any direct contact with the IU to attempt to resolve the noncompliance.

Control Authorities must take timely and effective enforcement against violators. Unresolved IU noncompliance may result in the Approval Authority enforcing directly against the IU and/or the Control Authority. The EPA may also take enforcement action where it deems action by the State or the Control Authority is inappropriate. An Approval Authority will routinely review the overall performance of a Control Authority in monitoring IUs, identifying violations, and in enforcing regulations.

Performance will be evaluated based on POTW self-monitoring data, written enforcement response plans, audits, inspections, and pretreatment program reports. Therefore, it is essential for Control Authorities to effectively manage program information to demonstrate proper implementation. Section 505 of the CWA allows citizens to file suit against a Control Authority that has failed to implement its approved pretreatment program as required by its NPDES permit. The Control Authority may be fined as well as required to enforce against violations of pretreatment standards and requirements in a court order.

ENFORCEMENT RESPONSE PLAN EVALUATION CHECKLIST

Name of POTW:	Date of Review:

Requirement	YES	NO	N/A	Section Reference
A. Does the Enforcement Response Plan (ERP) describe how the POTW will investigate instances of noncompliance?				
1. Does it indicate that inspections and sampling will be used as a means to identify IU noncompliance?				
2. Does it indicate that inspections and sampling will be used as a means to follow-up on IU noncompliance?				
3. Does it identify personnel responsible for conducting inspections and sampling?				
4. Does it identify personnel responsible for entering inspection and sampling results into the IU's file?				
5. Does it specify time frames for entering inspection and sampling data?				
6. Does it describe procedures for tracking and reviewing (including evaluating report completeness and accuracy) all IU reports and notifications?				
7. Does it specify personnel responsible for reviewing reports and notifications?				
8. Does it specify personnel responsible for recommending enforcement action?				
9. Does it describe procedures for tracking responses to enforcement actions?				
10. Does it include appropriate procedures for determining violations and calculating SNC based on continuous pH monitoring?				
11. Does it clearly indicate the enforcement response that will be taken in response to SNC, including causing interference, pass through, filing late reports, etc.?				
12. Does it indicate that the POTW will respond to instances of SNC with an enforceable order within 30 days of identification?				
B. Does the ERP describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of violations?				
1. Does it identify all possible types of noncompliance, including:				
a. Discharge without a permit (no harm)				
b. Discharge without a permit (harm)				
c. Failure to renew permit				

Requirement	YES	NO	N/A	Section Reference
d. Isolated violations of discharge limit (no harm)				
e. Isolated violations of discharge limit (harm)				
f. Recurring violation of discharge limit (no harm)				
g. Recurring violation of discharge limit (harm)				
h. Reported slug load (no harm)				
i. Reported slug load (harm)				
j. Late report				
k. Report is incomplete				
l. Failure to monitor all regulated pollutants				
m. Report is improperly signed or certified				
n. Failure to submit a report or notice				
o. Falsification of data				
p. Use of improper sampling procedures				
q. Failure to install monitoring equipment				
r. Missed compliance schedule milestones (no effect on final compliance date)				
s. Missed compliance schedule milestones (effect on final compliance date)				
t. Use of dilution instead of treatment				
u. Failure to properly operate and maintain pretreatment equipment				
v. Denial of entry to POTW personnel				
w. Failure to maintain records				
x. Failure to report additional monitoring				
2. Does the ERP reflect the full range of enforcement responses that are allowed under State law and the POTW's sewer use ordinance?				
3. Does the POTW's sewer use ordinance provide adequate legal authority for all enforcement actions the POTW proposes to initiate?				
4. When identifying appropriate enforcement actions, does the ERP allow for consideration of the following factors?				
a. Magnitude of the violation				
b. Duration of the violation				
c. Effect on receiving water				
d. Effect on POTW				
e. IU's compliance history				
f. IU's good faith				

Requirement	YES	NO	N/A	Section Reference
5. Does the ERP adequately describe procedures for escalating enforcement responses?				
6. Does the ERP include associated time frames for all activities including data review, initial and escalated enforcement actions, and follow-up actions?				
7. Does the ERP indicate that data will be reviewed no later than 5 working days after its receipt?				
8. Does the ERP indicate that initial enforcement actions will be taken no more than 30 days after detection of a violation?				
9. Do the proposed time frames in the ERP for initial enforcement actions make sense? For example, will NOVs be issued more promptly than more stringent enforcement action?				
10. Does the ERP allow for strong enforcement action to be taken immediately in the event of a major violation?				
11. Does the ERP indicate that initial follow-up compliance activities (e.g., inspections, sampling) will occur no later than 30 to 45 days after taking initial enforcement action?				
12. If the violation persists, does the ERP specify that escalating enforcement actions will be taken 60 to 90 days after the initial enforcement action?				
C. Does the ERP identify by title the persons responsible for each enforcement response?				
1. Are the positions described in the ERP consistent with those described in the POTW's program implementation procedures and sewer use ordinance?				
2. Do the positions identified in the ERP allow enforcement actions to be initiated in a timely and effective manner?				
D. Is the POTW's responsibility to enforce all pretreatment standards and requirements reflected in the ERP?				

Requirement	YES	NO	N/A	Section Reference
1. Do the enforcement procedures in the ERP allow for final resolution of noncompliance? For example, is there a procedure to ensure that the same enforcement action will not be taken again and again without final resolution?				
2. Are the procedures identified in the ERP consistent with those contained in the program implementation procedures and sewer use ordinance?				
E. In general, are the relevant elements of the ERP referenced and incorporated into other sections of the implementation manual?				

Grab Sample
A sample which is taken from a water or wastestream on a one-time basis with no regard to the flow of the water or wastestream and without consideration of time. A single grab sample should be taken over a period of time not to exceed 15 minutes.

Data Management and Recordkeeping

Any IU subject to pretreatment program reporting requirements is required to maintain records resulting from monitoring in a readily accessible manner for a minimum of 3 years (longer if during periods of any ongoing litigation). While the means for maintaining files is usually at the discretion of the POTW, all pretreatment activities should be documented and the documents maintained.

Types of IU records that the Control Authority should maintain ***include:***

Types of IU Records Retained

- Industrial waste questionnaire
- Permit applications, permits and fact sheets
- Inspection reports
- IU reports
- Monitoring data (including laboratory reports)
- Required plans (e.g., slug control, sludge management, pollution prevention)
- Enforcement activities
- **All** correspondence to and from the IU
- Phone logs and meeting summaries.

Types of POTW Records Retained

- Legal authority (e.g., SUO)
- Program procedures
- Program approval and modifications
- Copy of POTW NPDES permit(s)
- Local limits development
- ERP
- Correspondence to and from the EPA/State
- Annual reports to the Approval Authority
- Public notices
- Funding and resource changes
- Applicable Federal and State regulations
- IU compliance and permitting records

Tracking due dates, submissions, deficiencies, notifications, etc. and calculating effluent limitation noncompliance may be facilitated by a computerized data management system. Similarly, many Control Authorities use standardized forms (e.g., inspection questionnaires, chains-of-custody, field measurement records) and procedures (e.g., sampling, periodic compliance report reviews) to promote consistency and organization of program data.

In addition to specific IU records, Control Authorities should also maintain general program files that document specific program development and implementation activities that are not IU-specific. All information should be filed in an orderly manner and be readily accessible for inspection and copying by the EPA and State representatives or the public.

The pretreatment regulations specify that all information submitted to the Control Authority or State must be available to the public without restriction, except for confidential business information.

Substantial Modifications of POTW *Figure 30*

Pretreatment Programs (40 CFR §403.18)
1. Modifications that relax POTW legal authorities (as described in 40 CFR §403.8(f)(1)), except for modifications that directly reflect a revision to 40 CFR Part 403, and are reported pursuant to 40 CFR §403.18(d) - Approval procedures for nonsubstantial modifications;
2. Modifications that relax local limits, except for modifications to local limits for pH and reallocations of the Maximum Allowable Industrial Loading of a pollutant that do not increase the total industrial loadings for a pollutant, which are reported pursuant to 40 CFR §403.18(d) - Approval procedures for nonsubstantial modifications;
3. Changes to POTW's control mechanism, as described in 40 CFR §403.(f)(1)(iii);
4. A decrease in the frequency of self-monitoring or reporting required of industrial users;
5. A decrease in the frequency of industrial user inspections or sampling by the POTW;
6. Changes to the POTW's confidentiality procedures; and
7. Other modifications designated as substantial modifications by the Approval Authority on the basis that the modification could have a significant impact on the operation of the POTW's Pretreatment Program; could result in an increase in pollutant loadings at the POTW; or could result in less stringent requirements being imposed on Industrial users of the POTW.

Public Participation and POTW Reporting
Section 101(e) of the CWA establishes public participation as one of its goals, in the development, revision, and enforcement of any regulation, standard, effluent limitation, plan, or program established by the EPA or any State. The General Pretreatment Regulations encourage public participation by requiring public notices and/or hearings for program approval, removal credits, program modifications, local limits development and modifications, and IUs in SNC.

POTW pretreatment program approval requests require the Approval Authority to publish a notice (including a notice for a public hearing) in a newspaper of general circulation within the jurisdiction served by the POTW. All comments regarding the request, as well as any request for a public hearing must be filed with the Approval Authority within the specified comment period, which generally last 30 days.

The Approval Authority is required to account for all comments received when deciding to approve or deny the submission. The decision is then provided to the POTW and other interested parties, published in the newspaper with all comments received available to the public for inspection and copying.

Once a local pretreatment program is approved, the Control Authority must implement that program as approved. Before there is a significant change in the operation of a POTW pretreatment program, a program modification must be initiated. For substantial program modifications (see Figure 30), the Control Authority is required to notify the Approval Authority of the desire to modify its program and the basis for the change. These changes become effective upon approval.

Approval Authorities (or POTWs) are required to give public notice of the request for a modification, but are not required to notify the public of the decision if no comments are received and the request is approved without changes. Nonsubstantial modifications must also be submitted to the Approval Authority for review and approval, but these changes do not require public notice.

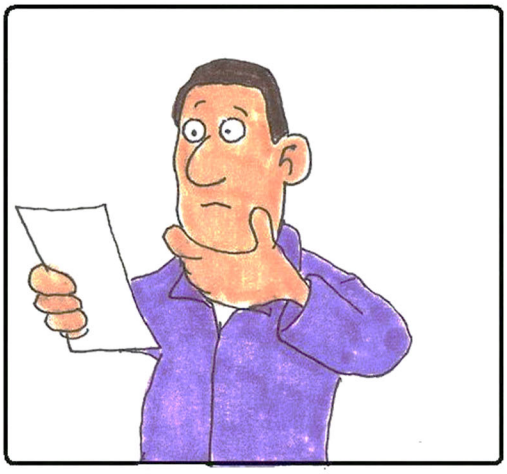
And unlike substantial modifications, nonsubstantial modifications become effective 45 days after submission unless the Approval Authority notifies the POTW otherwise.

Annual Publication

The POTW is also required to provide annual publication, in the largest daily newspaper in the municipality in which the POTW is located, of IUs that at any time during the previous twelve months were in SNC. In accordance with 40 CFR §403.12(I), Control Authorities are required to submit annual reports to the Approval Authority documenting program status and activities performed during the previous calendar year.

At a minimum, these reports must contain the following information:
1. A list of all POTW's IUs including names, addresses, pretreatment standards applicable to each user, IUs subject to categorical pretreatment standards or a brief explanation of deletions and a list of additions (with the aforementioned information) keyed to a previously submitted list;
2. A summary of the status of the IU compliance during the reporting period;
3. A summary of compliance and enforcement activities (including inspections) conducted by the POTW during the reporting period;
4. A summary of changes to the POTW's pretreatment program that have not been previously reported to the Approval Authority; and
5. Any other relevant information requested by the Approval Authority.

The first report is due within one year after program approval and at least annually thereafter. Approval Authorities may require additional information, or require that the reports be submitted in a specific format and/or at an increased frequency (e.g., semi-annually).



READ THE SAFETY DATA SHEET

WEAR PROPER PPE

HANDLING CHEMICALS

Is entry necessary?

Can the task be accomplished from the outside? For example, measures that eliminate the need for employees to enter confined spaces should be carefully evaluated and implemented if at all possible before considering human entry into confined spaces to perform non-emergency tasks.

Guidance Manual For Implementing Total Toxic Organics (TTO)

Industrial User Pretreatment Program Responsibilities

Industrial Users (**IUs**) are required to comply with all applicable pretreatment standards and requirements. Demonstration of compliance requires certain IUs to submit reports, self-monitor, and maintain records. A summary of the reporting requirements are provided, with details of each of these requirements discussed below.

Reporting Requirements

Minimum Federal Pretreatment Program reporting requirements for IUs are specified in 40 CFR §403.12. Since Control Authorities are responsible for communicating applicable standards and requirements to IUs and for receiving and analyzing reports, it is essential for Control Authority personnel to understand IU reporting and notification requirements contained in the General Pretreatment Regulations. These requirements are summarized below.

Categorical Industrial User (CIU) Reporting Requirements

Baseline Monitoring Report (**BMR**) [40 CFR §403.12(b)]

Each existing IU that is subject to a categorical pretreatment standard (identified as a Categorical Industrial User, or CIU) is required to submit a BMR within 180 days after the effective date of the standard.

If a category determination has been requested, the BMR is not due until 180 days after a final administrative decision has been made concerning the industry's inclusion in the category. The BMR must contain the following information:

- Name and address of the facility and names of the operator and owners.
- List of all environmental control permits held by, or for, the facility.
- Description of operations, including the average rate of production, and applicable Standard Industrial.

SIC Codes

Classification (**SIC**) codes, schematic process diagrams, and points of discharge to the POTW from regulated processes:

- ✓ Flow measurements (average daily and maximum daily) for regulated process wastestreams and nonregulated wastestreams, where necessary.

- ✓ Pollutant measurements [daily maximum, average concentration, and mass (where applicable)] and applicable standards.

- ✓ Certification, by a qualified professional (reviewed by a representative of the CIU), of whether applicable pretreatment standards are being met and, if not, a description of the additional operation and maintenance (**O&M**) or pretreatment facilities that are needed to comply with the standards.

A schedule by which the IU will provide the additional O&M or pretreatment needed to comply with the applicable pretreatment standards.

Notification of Discharge of Hazardous Wastes [40 CFR §403.12(p)]

IUs discharging more than 15 kilograms per month of a waste, which if otherwise disposed of, would be a hazardous waste pursuant to the RCRA requirements under 40 CFR Part 261 are required to provide a one-time written notification of such discharge to the Control Authority, State, and the EPA.

IUs discharging any amount of waste, which if disposed of otherwise, would be an acutely hazardous waste pursuant to RCRA must also provide this notification. This written notification must contain the EPA hazardous waste number and the type of discharge (i.e., batch, continuous).

If the IU discharges more than 100 kilograms per month of the hazardous waste, the written notification must also include:

- ✓ An identification of the hazardous constituent in the IU's discharge,
- ✓ An estimate of the mass and concentration of the constituents in the IU's discharge, and
- ✓ An estimate of the mass and concentration of constituents in the IU's discharge in a year.

IUs must also provide a certification accompanying this notification that a waste reduction program is in place to reduce the volume and toxicity of hazardous wastes to the greatest degree economically practical.

Within 90 days of the effective date of the listing of any additional hazardous wastes pursuant to RCRA, IUs must provide a notification of the discharge of such wastes.

Signatory and Certification Requirements [40 CFR §403.12(l)]
Pursuant to 40 CFR §403.12(l), BMRs, 90-day compliance reports and periodic compliance reports from CIUs must be signed by an authorized representative of the facility and contain a certification statement attesting to the integrity of the information reported. The reports should be signed by one of the following:

- ✓ A responsible corporate officer if the IU is a corporation.
- ✓ A general partner or proprietor if the IU is a partnership or sole proprietorship.
- ✓ A duly authorized representative of the above specified persons if such authorization is in writing, submitted to the Control Authority and specifies a person or position having overall responsibility for the facility where the discharge originates or having overall responsibility of environmental matters for the facility.

As required in 40 CFR §403.6(a)(2)(ii), the certification statement must read as follows:
"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 on 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 imprisonment for knowing violations."

While Federal regulations only require Control Authorities to require these signatures and certifications from CIUs, many POTWs have found it important to impose these requirements for all IU reports. To facilitate compliance, many Control Authorities have developed forms that include the certification statement and signatory requirements for use by all IUs.

BMRs

In addition to the certification noted above, BMRs must be signed and certified as detailed in 40 CFR §403.12(l) and as described later in this Chapter. If a CIU has already submitted the specific information required in a permit application or data disclosure form and this information is still current, it need not be reproduced and resubmitted in the BMR. The BMR is a one-time report, unless changed Federal categorical standards require submission of a new BMR.

At least 90 days prior to commencement of discharge, new sources are required to submit the above information (excluding the certification and compliance schedule), as well as information on the method that the source intends to use to meet the applicable pretreatment standards.

Compliance Schedule Progress Report [40 CFR §403.12(c)(3)]
A CIU that is not in compliance with applicable categorical standards by the time the standards are effective often will have to modify process operations and/or install end-of-pipe treatment to comply. Federal regulations require that the Control Authority develop and impose a compliance schedule for the CIU to install technology to meet applicable standards. As part of the BMR, a CIU that is unable to comply with the categorical standards must include a schedule for attaining compliance with the discharge standards.

In no case can the final or completion date in the schedule be later than the final compliance date specified in the categorical standards.

If deemed appropriate, the Control Authority may require compliance earlier than the final compliance date specified in the Federal regulations.

Compliance schedules are to contain increments of progress in the form of dates (not to exceed nine months per event) for commencement and completion of major actions leading to construction and operation of a pretreatment system and/or in-plant process modifications. Major activities could include hiring an engineer, completing preliminary analysis and evaluation, finalizing plans, executing a contract for major components, commencing construction, completion of construction, or testing operations.

In addition, the CIU must submit progress reports to the Control Authority no later than 14 days following each date in the compliance schedule (and final date for compliance), that include:
A statement of the CIU's status with respect to the compliance schedule
A statement of when the CIU expects to be back on schedule if it is falling behind, and the reason for the delay and steps being taken by the IU to return to the established schedule.

The Control Authority should review these reports as quickly as possible. When a CIU is falling behind schedule, the Control Authority should maintain close contact with the CIU. If the CIU fails to demonstrate good faith in meeting the schedule, the Control Authority may consider initiating appropriate enforcement action to correct the problem(s).

90-Day Compliance Reports [40 CFR §403.12(d) Section 403.12(d)] of the General Pretreatment Regulations requires a CIU to submit a final compliance report to the Control Authority.

An existing source must file a final compliance report within 90 days following the final compliance date specified in a categorical regulation or within 90 days of the compliance date specified by the Control Authority, whichever is earlier. A new source must file a compliance report to the POTW within 90 days from commencement of discharge.

These reports must contain:
Flow measurements (average daily and maximum daily) for regulated process wastestreams and nonregulated wastestreams, where necessary.
Pollutant measurements [daily maximum, average concentration, and mass (where applicable)] and applicable standards.

Certification, by a qualified professional, reviewed by a representative of the CIU, of whether pretreatment standards are being met and, if not, a description of the additional operation and maintenance (O&M) or pretreatment facilities that are needed to comply with the standards.

In addition to the certification noted above, 90-day final compliance reports must be signed and certified as detailed in 40 CFR §403.12(l) and as described later in this Chapter.

Figure 31. Definition of Upset (40 CFR §403.16)
Upset is defined as an exceptional incident in which there is unintentional and temporary noncompliance with categorical standards due to factors beyond the reasonable control of the CIU. An upset does not include noncompliance to the extent caused by operational error, improperly designed or inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation.

CIUs are allowed an affirmative defense for noncompliance with categorical standards if they can demonstrate that the noncompliance was the result of an upset (Figure 31).

Conditions necessary to demonstrate an upset has occurred are detailed in 40 CFR §403.16 and require the CIU to submit at least an oral report to the Control Authority within 24 hours of becoming aware of the upset and containing the following information:

a description of the indirect discharge and the cause of the noncompliance
the date(s) and times of the noncompliance
steps being taken and/or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

If this notification is provided orally, a written report must also be submitted within five days.

In any enforcement action, the IU has the burden of proof in establishing that an upset has occurred. The EPA is responsible for determining the technical validity of this claim.

Categorical and Significant Industrial User (SIU) Reporting Requirements
Periodic Compliance Reports [40 CFR §403.12 (e) & (h)]

After the final compliance date, CIUs are required to report, during the months of June and December, the self-monitoring results of their wastewater discharge(s).

The Control Authority must also require semi-annual reporting from SIUs not subject to categorical standards. The EPA established a minimum frequency of once every six months, determining this to be adequate for small SIUs or other facilities that have little potential to cause pass-through or interference or to contaminate the sewage sludge.

Periodic Compliance Reports

The EPA assumed that larger IUs and those that have more potential to cause problems would be required by the Control Authority to sample and report more often. All results for self-monitoring performed must be reported to the Control Authority, even if the IU is monitoring more frequently than required. Periodic compliance reports must include:

- ✓ nature and concentration of pollutants limited by applicable categorical standards or required by the Control Authority.
- ✓ flow data (average and maximum daily) as required by the Control Authority.
- ✓ mass of pollutants discharged (applicable to CIUs where mass limits have been imposed).
- ✓ production rates (applicable to CIUs where equivalent limits have been imposed or where limits imposed are expressed in allowable pollutant discharged per unit of production).

A Control Authority may choose to monitor IUs in lieu of the IU performing the self-monitoring. Additionally, 40 CFR §403.12(e) and (h) require compliance with 40 CFR Part 136 (Guidelines for Establishing Test Procedures for the Analysis of Pollutants).

To demonstrate compliance with these requirements, IUs may have to submit information regarding sample handling and analytical procedures to the Control Authority.

Development of standardized forms for use by IUs and their testing labs can facilitate documentation and submission of all required information and can streamline the IU and Control Authority review process.

Bypass [40 CFR §403.17] The General Pretreatment Regulations define ***"bypass"*** as the intentional diversion of wastestreams from any portion of a user's treatment facility. If a bypass results in noncompliance, even if it was due to essential maintenance, the IU must provide a report to the Control Authority detailing a description of the bypass and the cause, the duration of the bypass, and the steps being taken and/or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

Oral notice must be provided to the Control Authority within 24 hours of the detection of an unanticipated bypass, with a written follow-up due within 5 days. For an anticipated bypass, the IU must submit notice to the Control Authority, preferably 10 days prior to the intent to bypass.

Notification of Potential Problems [40 CFR §403.12(f)]
All IUs are required to notify the Control Authority immediately of any discharges which may cause potential problems. These discharges include spills, slug loads, or any other discharge which may cause a potential problem to the POTW.

Noncompliance Notification [40 CFR §403.12(g)(2)]
If monitoring performed by an IU indicates noncompliance, the IU is required to notify the Control Authority within 24 hours of becoming aware of the violation. In addition, the IU must repeat sampling and analysis, and report results of the re-sampling within 30 days.

The repeat sampling is not required if the Control Authority samples the IU at least once per month or if the Control Authority samples the IU between the time of the original sample and the time the results of the sampling are received.

Notification of Changed Discharge [40 CFR §403.12(j)]
All IUs are required to promptly notify the Control Authority in advance of any substantial changes in the volume or character of pollutants in their discharge.

Self-Monitoring Requirements

All SIUs, including CIUs must conduct self-monitoring as part of several different reporting requirements as noted above. For CIUs, this includes the BMR, 90-day compliance report and periodic compliance reports (40 CFR §§403.12(b),(d), and (e), respectively). Non-categorical SIUs are required to self-monitor as part of the periodic reporting requirements (40 CFR §403.12(h)). As noted in 40 CFR §§403.12(g)(4), sample collection and analysis for all required pretreatment program reports must be conducted using 40 CFR Part 136 procedures and amendments thereto.

Refer to Chapter 4 of this manual and the EPA's 1994 *Industrial User Inspection and Sampling Manual for POTWs* for additional information on sample collection and analysis procedures.

Based on the specific pollutants regulated by categorical standards, different types of samples may have to be collected. For BMR and 90-day compliance reports, a minimum of four grab samples must be collected for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organics.

If these pollutants are not regulated by the specific categorical standard, monitoring is not required. Twenty-four hour flow-proportional composite samples must be collected for all other pollutants. The Control Authority may waive flow-proportional composite sampling if an IU demonstrates that flow-proportional is not feasible. In these cases, time-proportional composite samples may be collected.

Self-monitoring for periodic compliance reports must be conducted in accordance with the IU's discharge permit requirements. The Control Authority must ensure that these permits specify sampling location(s), required sampling frequencies, sample types to be collected, sampling and analytical procedures (40 CFR Part 136), and associated reporting requirements. At a minimum, CIUs must monitor for all categorically regulated pollutants at least once every six months, although permits issued by the local Control Authority may require more frequent monitoring.

TTO
In certain instances, CIUs subject to TTO standards may implement alternatives in lieu of monitoring all regulated toxic organic compounds.

TOMP
For example, the electroplating and metal finishing standards allow IUs to monitor only for those toxic organic compounds that are reasonably expected to be present. Additional TTO guidance related to the electroplating and metal finishing categories can be found in the EPA's 1984 *Guidance Manual for Electroplating and Metal Finishing Pretreatment Standard*s.

For certain industries (i.e., electroplating, metal finishing, and electrical and electronic components) Control Authorities have the option of allowing the CIU to prepare and implement a Toxic Organic Management Plan (**TOMP**) in lieu of periodic monitoring.

In those instances, the TOMP should identify all potential sources from which toxic organic materials could enter the wastestream and propose control measures to eliminate the possibility. Where a TOMP is allowed, an IU can demonstrate compliance through adherence to the TOMP and submission of periodic certification statements attesting to the fact that: *"no dumping of concentrated toxic organic pollutants has occurred and that the facility's TOMP is being implemented."*

TOMPs cannot be used in lieu of monitoring for BMRs and 90-day compliance reporting requirements. The categorical standards for some industries (i.e., aluminum forming, copper forming, coil coating, and metal molding and casting) allow IUs to monitor oil and grease (**O&G**) as an alternative to TTO monitoring.

This option may be used to fulfill TTO monitoring requirements of the BMR, 90-day compliance report, and periodic compliance reports and allows the IU to determine whether it wants to demonstrate compliance with the TTO or the O&G standards. A detailed description of TTO monitoring requirements is provided in the EPA's 1985 *Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standard*s.

Recordkeeping Requirements

IUs are required to maintain records of their monitoring activities [40 CFR §403.12(O)]. Information, at a minimum, shall include the following:

- ✓ sampling methods, dates and times,
- ✓ identity of the person(s) collecting the samples and of the sampling location(s),
- ✓ the dates the analyses were performed and the methods used,
- ✓ the identity of the person(s) performing the analyses and the results of the analyses.

These records shall be retained for at least 3 years, or longer in cases where there is pending litigation involving the Control Authority or IU, or when requested by the Approval Authority.

These records must be available to the Control Authority and Approval Authority for review and copying. Historically, most Control Authorities do not dispose of any records; rather, older records are archived at an off-site location.

Database personnel are essential to the pretreatment data management operation.

Figure 32. Industrial User Reporting Requirements

REQUIRED REPORT AND CITATION	APPLY TO	REPORT DUE DATE	PURPOSE OF REPORT
Baseline Monitoring Report (BMR) *40 CFR §403.12(b)(1-7)*	CIUs	Existing Source - Within 180 days of effective date of the regulation or an administrative decision on category determination. New Source - At least 90 days prior to commencement of discharge.	- To provide baseline information on industrial facility to Control Authority - To determine wastewater discharge sampling points - To determine compliance status with categorical pretreatment standards
Compliance Schedule Progress Reports *40 CFR §403.12(c)(1-3)*	All IUs	Within 14 days of each milestone date on the compliance schedule; at least every 9 months.	- To track progress of the industrial facility through the duration of a compliance schedule.
90-Day Compliance Report *40 CFR §403.12(d)*	CIUs	Within 90 days of the date for final compliance with applicable categorical pretreatment standard; for new sources, the compliance report is due within 90 days following commencement of wastewater discharge to the POTW.	- To notify Control Authority as to whether compliance with the applicable categorical pretreatment standards has been achieved - If facility is noncompliant, to specify how compliance will be achieved.
Periodic Compliance Report *40 CFR §403.12(e)*	CIUs	Every June and December after the final compliance date (or after commencement of a discharge for new sources) unless frequency is increased by the Control Authority.	- To provide the Control Authority with current information on the discharge of pollutants to the POTW from categorical industries.
Notice of Potential Problems *40 CFR §403.12(f)*	All IUs	Notification of POTW immediately after occurrence of slug load, or any other discharge that may cause problems to the POTW.	- To alert the POTW to the potential hazards of the discharge.
Noncompliance Notification *40 CFR §403.12(g)(2)*	All IUs	Notification of POTW within 24 hours of becoming aware of violation.	- To alert the POTW of a known violation and potential problems which may occur.
Periodic Compliance Reports for Noncategorical Users *40 CFR §403.12(h)*	Non-Cat. SIUs	Every six months on dates specified by the Control Authority.	- To provide the POTW with current information on the discharge of pollutants to the POTW from industrial users not regulated by categorical standards.
Notification of Changed Discharge *40 CFR §403.12(j)*	All IUs	In advance of any substantial changes in the volume or character of pollutants in the discharge.	- To notify POTW of anticipated changes in wastewater characteristics and flow which may affect the POTW.
Notification of Hazardous Wastes Discharge *40 CFR §403.12(p)*	All IUs	For new discharges, within 180 days after commencement of discharge.	- To notify POTW, EPA, and State of discharges of hazardous wastes under 40 CFR Part 261.
Upset *40 CFR §403.16*	CIUs	24 hours of becoming aware of the upset (5 days where notification was provided orally)	- To notify the POTW of unintentional and temporary noncompliance with categorical standards.

Bypass *40 CFR §403.17*	All IUs	10 days prior to date of the bypass or oral notice within 24 hours of the IU becoming aware of the bypass with written notification within 5 days.	- To notify the POTW of noncompliance and potential problems which may occur

Best Management Practices (BMPs) Introduction

Best Management Practices (BMPs)
The required maintenance frequency for interceptor/collector devices depends greatly on the amount of FOG a facility generates as well as any best management practices (BMPs) that the establishment implements to reduce the FOG discharged into its sanitary sewer system. In many cases, an establishment that implements BMPs will realize financial benefit through a reduction in their required grease interceptor and trap maintenance frequency.

A growing number of control authorities are using their existing authority (e.g., general pretreatment standards in Part 403 or local authority) to establish and enforce more FOG regulatory controls (e.g., numeric pretreatment limits, best management practices including the use of interceptor/collector devices) for food service establishments to reduce interferences with POTW operations (e.g., blockages from fats, oils, and greases discharges, POTW treatment interference from Nocardia filamentous foaming, damage to collection system from hydrogen sulfide generation).

Non-Compliance Rate Example
For example, since identifying a 73% non-compliance rate with its grease trap ordinance among restaurants, New York POTW has instituted a $1,000-per-day fine for FOG violations. Likewise, more and more municipal wastewater authorities are addressing FOG discharges by imposing mandatory measures of assorted kinds, including inspections, periodic grease pumping, stiff penalties, and even criminal citations for violators, along with ‘strong waste’ monthly surcharges added to restaurant sewer bills. Surcharges are reportedly ranging from $100 to as high as $700 and more, the fees being deemed necessary to cover the cost of inspections and upgraded infrastructure.

Residential and Commercial Guidelines
The fats, oil and grease (FOG) found in food ingredients such as meat, cooking oil, shortening, butter, margarine, baked goods, sauces and dairy products is a major concern for POTW’s sewers. When not disposed of properly, FOG builds up in the sewer system constricting flow, which can cause sewer back-ups into homes and overflow discharges onto streets. It can also interfere with sewage treatment processes at the POTW’s Wastewater Treatment Plants.

To remediate this problem, many control authorities have developed an outreach program aimed at eliminating FOG from the sewer system. FOG buildup in sewer lines has many harmful and costly effects.

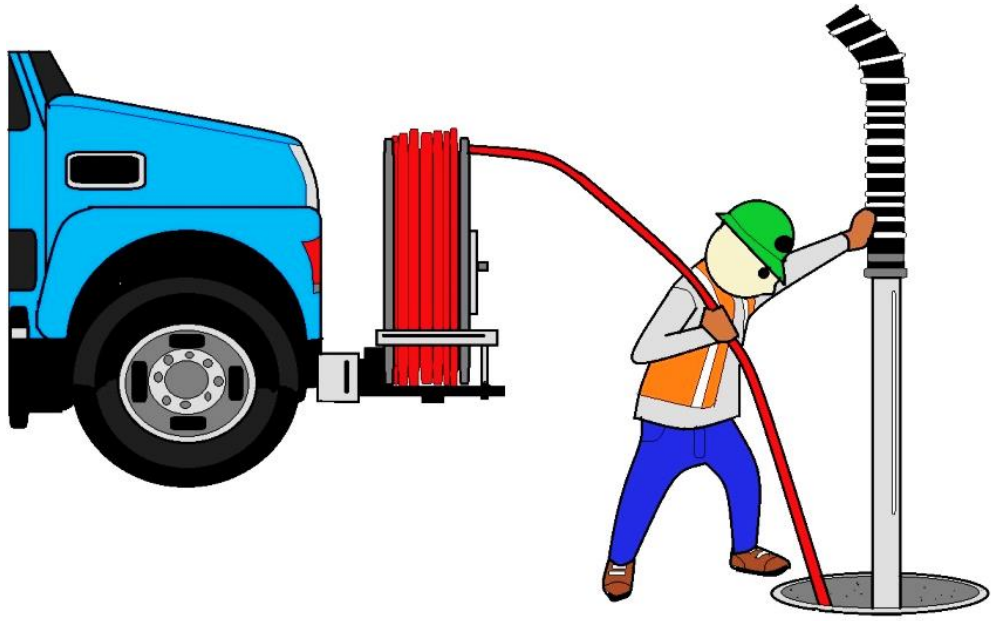
Sewer backups into homes create a health hazard as well as an unpleasant mess that can cost hundreds and sometimes thousands of dollars to clean up. In certain parts of the POTW, FOG can enter storm drains and flow directly into water bodies and onto beaches creating serious environmental and health conditions.

In addition to problems caused by cooking oils, petroleum-based oils can also cause sewer-related problems.

POTW residents or customers may not be aware of or understand their role in these sewer-related problems or pollution, but they can do a lot to help eliminate FOG and other contaminants from the sewer system.

For example:
Other related components of a FOG or CMOM program will include:

- Car washing can result in soap and oil residue entering the storm sewers.
- Run-off from your sprinkler, watering hose, or from the rain can carry yard waste and fertilizer into storm sewers.
- Littering can cause trash and debris to clog catch basins and storm drains.
- A gallon of oil poured down a storm drain could contaminate up to one million gallons of water.



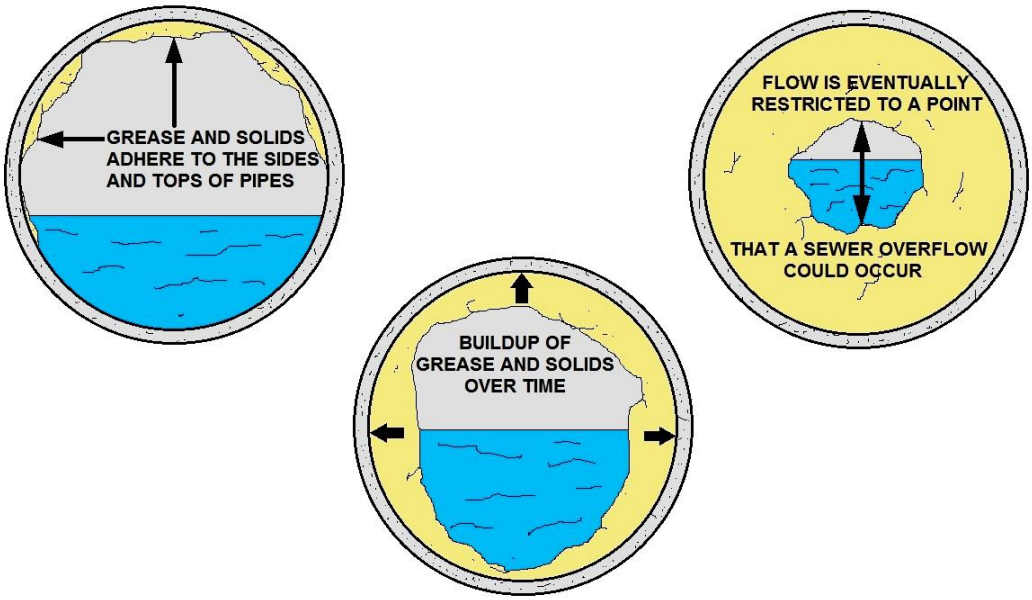
USING A VACUUM TRUCK TO CLEAN SEWER
Often the Vactor is called out to clean out the above concerns.

Reducing Fats, Oils, and Grease in Your Commercial Kitchen

How commercial kitchens can reduce disposing of fats, oil, and grease down the drain.

Any business or institution with a commercial kitchen has to deal with fats, oils, and grease (FOG).

Commercial kitchens are found in restaurants, hospitals, churches, hotels, nursing homes, mobile food preparation facilities, etc.



EFFECTS OF GREASE AND SOLIDS ON SEWER FLOW

Using Best Management Practices Can…

- Lessen the likelihood of losing revenue to emergency shutdowns caused by sewage backups and expensive bills for plumbing and property repairs.
- Lessen the likelihood of lawsuits by nearby businesses over sewer problems caused by your negligence.
- Lessen the likelihood of lawsuits from workers or the public exposed to raw sewage during a backup.
- Reduce the number of times you have to pump and clean your grease interceptors or traps.
- Lessen the likelihood of surcharges from your local sewer authority, or chargebacks for repairs to sewer pipes attributable to your FOG.
- Reduce testing requirements imposed due to a history of violations.
- Lessen the likelihood of enforcement action by local authorities due to violations of ordinances.

Industrial Uses (Fats, Oils, and Grease)
Fats, Oils, and Grease Resources
Liquid fats and solid meat products are materials that should not be sent to landfills or disposed of in the sanitary sewer system. Fats, oils, and grease (FOG) can clog pipes and pumps both in the public sewer lines as well as in wastewater treatment facilities. This prevents combined sewer overflows, which protects water quality and lowers bills.

FOG should be sent to the rendering industry to be made into another product, converted to biofuels, or sent to an anaerobic digester.

Proper Disposal Methods

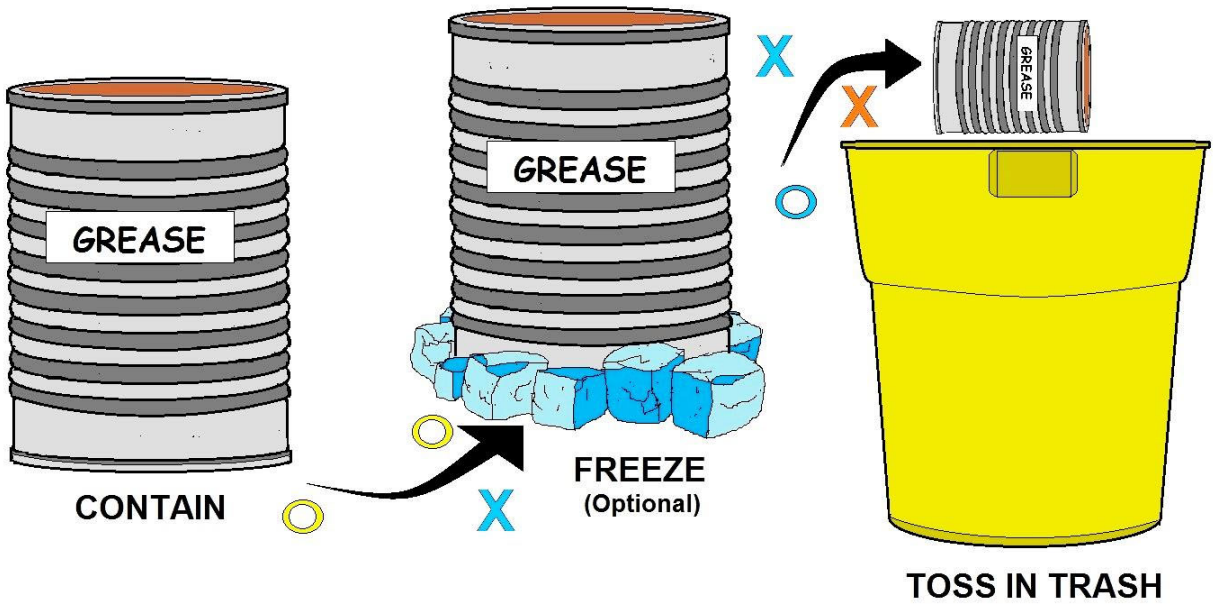
Ways in which a customer can reduce the amounts of FOG that enters the sewer system is by doing the following:

- ✓ Have grease interceptors or traps inspected, maintained and cleaned regularly. (Usually every 6 months they should be pumped out).
- ✓ Scrape grease and food residue from dishes and pans into a garbage bag before placing them into your dishwasher or sink.
- ✓ Allow grease to cool to a safe temperature after cooking before disposal.
- ✓ Only dispose of fat and grease in an approved container or by an approved method.
- ✓ Recycle used cooking or motor oil at a recycling center.
- ✓ First freeze the grease or oil and then throw the hardened oil away on trash day.
- ✓ Mix oils with unscented kitty litter, sawdust or sand to solidify the oil (Avoid scented or disinfectant types of kitty litter as they can react with the oil and cause a fire).
- ✓ Use a paper towel to wipe small amounts of cooking oil, such as meat drippings, and throw the paper towel in the trash.
- ✓ Install “No Grease” signs around sinks to remind employees to avoid dumping fry grease and other fat products down the drain.
- ✓ Frying oils can generally be stored for up to six months and also can be reused for up to six hours of frying time. Store oil in the original container after cooling and strain for foreign materials as it is being poured back into the container.

Methods that should be avoided:

- ✓ Pouring household grease into sinks, garbage disposals or other drains. This is one of the major contributors to sewer stoppages.
- ✓ Flushing grease, diapers, sanitary napkins, newspapers, soiled rags, and/or paper towels down toilets.
- ✓ Pouring oil or grease into a storm drain; it is the same as pouring it directly into a lake.
- ✓ Ignoring your grease trap maintenance schedule.

Ways to Recycle FOG



THE SINK SHOULD NEVER BE USED TO DISPOSE OF:

OILS , FATS OR GREASE

Rendering FOG

Liquid fats and solid meat products can be used as raw materials in the rendering industry, which converts them into animal food, cosmetics, soap, and other products. Many companies will provide storage barrels and free pick-up service.

Converting FOG to Biodiesel

FOG are collected and converted by a local manufacturer into environmentally friendly biodiesel fuel. Biodiesel is an alternative fuel produced from renewable resources such as virgin oils (soybean, canola, palm), waste cooking oil, or other bio-waste feedstock.

Biodiesel significantly reduces greenhouse gases, sulfur dioxide in air emissions, and asthma-causing soot. Along with creating less pollution, biodiesel is simple to use, biodegradable and nontoxic.

Inspection Checklists

Pretreatment programs are developing and using inspection checklists for both food service establishments and municipal pretreatment inspectors to control FOG discharges.

Additionally, EPA identified typical numeric local limits controlling oil and grease in the range of 50 mg/L to 450 mg/L with 100 mg/L as the most common reported numeric pretreatment limit.

EPA expects that blockages from FOG discharges will decrease as POTWs incorporate FOG reduction activities into their Capacity, Management, Operations, and Maintenance (CMOM) program and daily practices.

CMOM programs are comprehensive, dynamic, utility specific programs for better managing, operating and maintaining sanitary sewer collection systems, investigating capacity constrained areas of the collection system, and responding to SSOs.

Collection system owners or operators who adopt FOG reduction activities as part of their CMOM program activities are likely to reduce the occurrence of sewer overflows and improve their operations and customer service.

Summary

The National Pretreatment Program provides regulatory tools and authority to state and local POTW pretreatment programs for eliminating pollutant discharges that cause interference at POTWs, including interference caused by the discharge of Fats, Oils, and Grease (FOG) from food service establishments (FSE).

More specifically, the Pretreatment Program regulations at 40 CFR 403.5(b)(3) prohibit “solid or viscous pollutants in amounts which will cause obstruction” in the POTW and its collection system.

EPA’s Report to Congress on combined sewer overflows (CSOs) and sanitary sewer overflows (SSOs) identified that “grease from restaurants, homes, and industrial sources are the most common cause (47%) of reported blockages.

Grease is problematic because it solidifies, reduces conveyance capacity, and blocks flow.”

Controlling FOG discharges will help POTWs prevent blockages that impact CSOs and SSOs, which cause public health and water quality problems.

Controlling FOG discharges from FSEs is an essential element in controlling CSOs and SSOs and ensuring the proper operations for many POTWs. The interference incidents identified in CSO/SSO report to Congress may indicate the need for additional oversight and enforcement of existing regulations and controls.

Post Quiz

This is not your final assignment, but is a short comprehension quiz. The answers are located at the end of Acknowledgements in a few more pages.

Objectives of the pretreatment program:

1. Protect publicly owned treatment works (POTW) from pollutants that may cause interference with sewage treatment plant operations. True or False

2. Prevent introducing pollutants into a POTW that could cause pass through of untreated pollutants to receiving waters.

3. Manage pollutant discharges into a POTW to improve opportunities for reuse of POTW wastewater and residuals (sewage sludge).

4. Prevent introducing pollutants into a POTW that could cause worker health or safety concerns, or that could pose a potential endangerment to the public or to the environment.

5. _____ establish responsibilities of Federal, State, and local government, industry and the public to implement Pretreatment Standards to control pollutants from the industrial users which may pass through or interfere with POTW treatment processes or which may contaminate sewage sludge.

6. The National Pretreatment Program identifies specific requirements that apply to all IUs, additional requirements that apply to _____, and certain requirements that only apply to CIUs.

7. The objectives of the National Pretreatment Program are achieved by applying and enforcing three types of discharge standards which are?

8. _____ are limitations on pollutant discharges to publicly owned treatment works (POTWs), promulgated by the EPA in accordance with Section 307 of the Clean Water Act that apply to specific process wastewaters of particular industrial categories.

9. What term represents a discharge which exits the POTW into waters of the U.S. in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources?

10. What term represents a discharge which, alone or in conjunction with a discharge or discharges from other sources, both inhibits or disrupts the POTW, its treatment processes or operations?

11. As outlined in the EPA's objectives_____ may pass through the treatment plant into the receiving stream, posing serious threats to aquatic life, to human recreation, and to consumption of fish and shellfish from these waters.

12. Categorical pretreatment standards (i.e., categorical standards) are national, uniform, technology-based standards that apply to discharges to POTWs from specific industrial categories (i.e., indirect dischargers) and _____.

13. Categorical pretreatment standards for _____(PSES and PSNS, respectively) are promulgated by the EPA pursuant to Section 307(b) and (c) of the CWA.

14. Limitations developed for _____are designed to prevent the discharge of pollutants that could pass through, interfere with, or otherwise be incompatible with POTW operations.

15. Which term was developed in conjunction with categorical standards, limit the discharge from facilities directly to waters of the U.S. (i.e., direct dischargers) and do not apply to indirect dischargers?

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Post Quiz Answers
1. True, 2. True, 3. True, 4. True, 5. The General Pretreatment Regulations, 6. All SIUs, 7. Prohibited discharge standards, categorical Pretreatment standards, local limits, 8. Categorical Pretreatment Standards, 9. Pass Through, 10. Interference, 11. Toxic pollutants, 12. Limit the discharge of specific pollutants, 13. Both existing and new sources, 14. Indirect discharges, 15. Effluent limitations guidelines (ELGs)

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