

## Pretreatment Streamlining Rule TPDES Modifications Checklist

Control Authority Name \_\_\_\_\_ Date \_\_\_\_\_

Sampling Protocols Checklist				
Elements	Yes	No	Section, Page No.	Comments
1. If the CA performs sampling in lieu of SIU self-monitoring, then the CA is required to perform any required repeat sampling and analysis  <i>[40 CFR §403.12(g)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
2. The repeat sampling is required be performed within 30 days of becoming aware of a violation  <i>[40 CFR §403.12(g)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
3. In lieu of the CA performing any required repeat sampling and analysis, the CA must notify the IU of the violation and require the IU to repeat the sampling and analysis within the 30 day time frame  <i>[40 CFR §403.12(g)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
4. Resampling is not required if the following are performed:  <i>[40 CFR §403.12(g)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• The CA performs the sampling at the IU at a frequency of at least once per month <b>OR</b></li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• The CA performs sampling at the IU between the time when the initial sampling was conducted and the time when the IU or the CA receives the results of the sampling</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		

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5. Reports required under 40 CFR §§403.12(b), (d), (e), and (h) must be based on data obtained using appropriate sampling and analysis performed during the period covered by the report, which <b>data are representative</b> of conditions occurring during the reporting period  <i>[40 CFR §403.12(g)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
6. Grab samples must be used for pH, cyanide, total phenols, oil and grease (O&G), sulfide, and volatile organic compounds  <i>[40 CFR §403.12(g)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
7. Using protocols (including appropriate preservation) specified in 40 CFR Part 136 and appropriate EPA guidance, multiple grab samples collected during a 24-hour period may be composited prior to analysis as follows:  <i>[FR/Vol.70, No. 198/pg 60157]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• For cyanide, total phenols, and sulfides, the samples may be composited in the laboratory <b>or</b> in the field</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• For volatile organics and O&amp;G, the samples may be composited in the laboratory (only)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
8. Total residual chlorine, pH, and temperature samples cannot be “composited” under any circumstances  <i>[FR/Vol.70, No. 198/pg 60157]</i>	<input type="checkbox"/>	<input type="checkbox"/>		

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9. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized (in writing) by the CA  <i>[40 CFR §403.12(g)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
10. The IU must demonstrate (in writing) that the time-proportional or grab samples are representative of the discharge before the CA may allow the IU to submit such samples  <i>[FR/Vol.70, No. 198/pg 60157]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
11. Where time-proportional composite sampling or grab sampling is authorized (in writing) by the CA:  <i>[FR/Vol.70, No. 198/pg 60157]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• The samples must be representative of the IU's wastewater discharge</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• The decision to allow the alternative sampling [or site specific circumstances] must be documented in the IU file</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
12. Composite samples for other parameters unaffected by the compositing procedures, as documented in EPA methodologies, may be authorized (in writing) by the CA, as appropriate  <i>[40 CFR §403.12(g)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		

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Elements	Yes	No	Section, Page No.	Comments
13. For sampling facilities that discharge less than 24-hours per day, the sampling must be representative of the IU's wastewater discharge  <i>[40 CFR §403.12(g)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• Sampling must be taken within a 24-hour period, however, the sample should only be collected during that portion of the 24-hour period that the IU is discharging from the:                             <ul style="list-style-type: none"> <li>○ <b>regulated process</b> and/or</li> <li>○ pretreatment unit (as long as regulated process wastewater is flowing through the pretreatment unit)</li> </ul> </li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<i>[FR/Vol.70, No. 198/pg 60157]</i>				
14. During parts of the day when there is no discharge of <b>process</b> wastewater, standing water should not be disproportionately sampled and analyzed as it would not be representative of the discharge from the IU  <i>[FR/Vol.70, No. 198/pg 60158]</i>				
15. The CA is required to prescribe a sampling protocol that produces representative results				
<ul style="list-style-type: none"> <li>• The selected protocol should take into consideration:                             <ul style="list-style-type: none"> <li>○ all of the operation conditions <b>and</b></li> <li>○ the physical configuration of the IU facility</li> </ul> </li> </ul>				
<i>[FR/Vol.70, No. 198/pg 60158]</i>				

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Elements	Yes	No	Section, Page No.	Comments
<p>16. Daily discharge is required to be defined as the “discharge of a pollutant” measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling</p> <p><i>[FR/Vol. 70, No. 198/pg. 60158]</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>17. There are some cases where a single grab sample may be reasonably expected to be representative of an IU's discharge</p> <p><i>[Appendix V of the EPA Industrial User Inspection and Sampling Manual for POTWs, April 1994, lists cases where a single grab sample may appropriately be substituted for a single composite sample, including small batch discharges. For example, a homogeneous batch discharge is consistent with existing guidance on the appropriate use of a single grab sample.]</i></p> <p><i>[FR/Vol.70, No. 198/pg 60157]</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<p>18. For existing IUs where historical sampling data are available, the CA may authorize (in writing) a lower minimum of grab samples</p> <p><i>[40 CFR §403.12(g)(4) and FR/Vol.70, No. 198/pg 60156]</i></p>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• Historical data must provide information sufficient in order for the CA to determine the need for industrial pretreatment measures</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		

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Elements	Yes	No	Section, Page No.	Comments
19. For sampling required in support of baseline monitoring reports (BMRs) and 90-day reports required in 40 CFR §§403.12(b) and (d)	<input type="checkbox"/>	<input type="checkbox"/>		
<i>[40 CFR §403.12(b)(5)(vi)]</i>				
<ul style="list-style-type: none"> <li>• a minimum of four grab samples are required for pH, cyanide, total phenols, O&amp;G, sulfide, and volatile organic compounds for:</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<i>[FR/Vol.70, No. 198/pg 60156-60157]</i>				
<ul style="list-style-type: none"> <li>○ new IUs</li> </ul>				
<ul style="list-style-type: none"> <li>○ existing IUs that make changes or install new treatment; <b>OR</b></li> </ul>				
<ul style="list-style-type: none"> <li>○ existing IUs for which historical sampling data do not exist</li> </ul>				
20. For existing IUs where historical sampling data are available, the CA may authorize (in writing) a lower minimum of grab samples	<input type="checkbox"/>	<input type="checkbox"/>		
<i>[40 CFR §403.12(g)(4) and FR/Vol.70, No. 198/pg 60156]</i>				
<ul style="list-style-type: none"> <li>• Historical data must provide information sufficient in order for the CA to determine the need for industrial pretreatment measures</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
21. Where there has been a change to existing IUs, for example, the addition of treatment, historic data that does not represent the current discharge would not be able to be used to justify a lower minimum of grab samples				
<i>[FR/Vol.70, No. 198/pg 60159]</i>				

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Elements	Yes	No	Section, Page No.	Comments
22. Sampling requirements, which previously only applied to BMRs and 90-day reports, extent to the following reports  <i>[40 CFR §§403.12(g)(1) and (3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• Reports on continued compliance</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> <li>• Noncategorical SIU reports</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>		
23. For reports on continued compliance and noncategorical SIU reports required by 40 CFR §§403.12 (e) and (h), the CA shall require the number of grab samples necessary to assess and assure compliance by IUs with applicable pretreatment standards and requirements  <i>[40 CFR §403.12(g)(4)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
24. The CA is required to document site-specific circumstances and allowing alternate sampling by including the alternate sampling in the IU control mechanism  <i>[FR/Vol.70, No. 198/pg 60158]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
25. The CA is required to document how alternate sampling techniques are representative of the discharge  <i>[FR/Vol.70, No. 198/pg 60159]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
26. The CA may require that more than four grab samples be taken and separately analyzed to ensure that sampling is representative  <i>[FR/Vol.70, No. 198/pg 60159]</i>	<input type="checkbox"/>	<input type="checkbox"/>		

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27. Where the CA cannot <b>verify</b> that previous techniques were representative, such data will not support the use of this alternative practice  <i>[FR/Vol.70, No. 198/pg 60159]</i>	<input type="checkbox"/>	<input type="checkbox"/>		

Sampling Protocols Checklist.	
The approved program <u>may</u> need to be revised in one or more of the following components:	
X	Legal Authority
X	Enforcement Response Plan
X	IU Compliance Evaluation
	Inspection Forms/Procedures
X	Sampling Protocols – Self Monitoring and Compliance Monitoring
X	IU Permits
X	IU Reporting Requirements
X	CA Compliance and Sampling Tracking Database
X	Other Standard Operating Procedures