

## Pretreatment Program Indirect Discharge Sampling and Reporting Instructions

*Note: These instructions are applicable to both sampling and reporting required to satisfy permit conditions and also to complete applications.*

You are required to collect and report data on the pollutants discharged from each of your connections to the public sewer. There are four groups of pollutants, each to be reported in accordance with the specific instructions for that group. If this facility is not yet discharging, you are required to report estimates for those pollutants that you know or have reason to believe will be discharged from the facility or will be regulated by categorical pretreatment standards.

### General Instructions

Group A requires you to report at least one analysis for each pollutant listed. Groups B and C require you to report analytical data in two ways. For some pollutants, you may be required to report analytical results of the levels of pollutants in your discharge whether or not you expect them to be present in discharge. For all others, you are required to report analytical results for those pollutants you know or have reason to believe are present in your discharge in concentrations of 10 ug/L or greater. Base your determination that a pollutant is present in your discharge on your knowledge of raw materials, maintenance chemicals, intermediate or final products and byproducts, and any previous analyses known to you of your effluent or similar effluent.

### Sampling

Samples should be collected by a person experienced in sampling of industrial wastewater. Any specific requirements contained in the applicable analytical methods should be followed regarding sample containers, sample preservation, holding times, or the collection of duplicate samples. The sample must be collected at a location that provides a representative sample. This location must be included on the process/flow schematic diagram required with the permit application. The time at which the samples are collected must be representative of normal operations.

For pH, temperature, cyanide, total phenols, volatile organics, hexavalent chromium, and oil and grease, grab samples must be collected. For all other parameters, 24-hour composite samples must be collected.

Grab and composite samples are defined as follows:

- Grab sample: An individual sample.
- Composite sample: A combination of at least 8 sample aquilots, collected at periodic intervals during the operating hours of a facility over a 24-hour period. The composite must be flow proportional; either the time interval between each aquilot or the volume of each aquilot must be proportional to either the discharge flow at the time of the sampling or the total discharge flow since the collection of the previous aquilot. Aquilots may be collected manually or automatically.
  - For gas chromatography-mass spectrometry (GC/MS) Volatile Organic Analysis (VOA), aquilots must be combined in the laboratory immediately before analysis. Four (4) aquilots should be collected for VOA. These 4 samples should be collected during the actual hours of discharge over a 24 hour period and need not be flow proportional.

Data from samples previously collected may be used provided that (1) all data requirements are met, (2) sampling was conducted no more than two years before this submission, and (3) all data are representative of the present discharge. If historical data is used, this must be clearly indicated for each pollutant. The Ohio EPA may request current analytical data if it is determined to be necessary to adequately assess your discharges.

## Analysis

You must use test methods promulgated in 40 C.F.R. 136; however, if none have been promulgated for a particular pollutant, you may use any suitable method provided you submit a description of the method or a reference to a published method.

## Reporting

Report analytical data by filling out pages 11 to 14 of the permit application or by attaching sheets of paper if these separate sheets contain all the required information in a format which is consistent with pages 11 to 14 in spacing, columns, and in identification of pollutants. All levels must be reported as concentration, clearly indicating the units. Specify which industry category(s) was used as the basis for sampling.

## **Specific Instructions**

### Sampling Location

Briefly describe the location where the samples were collected. The sampling location should be identified on the site plan as well.

### Group A

All applicants must report quantitative data for each of these pollutants for each connection to the public sewer.

### Group B

All applicants must report for this group of pollutants according to the following conditions: (1) if pollutant(s) discharged are regulated by categorical pretreatment standards; or (2) for other discharged pollutants appearing on this list but not regulated, all applicants must provide quantitative data or briefly explain their presence in your discharge.

### Group C

Table 1 lists the primary industry categories. Each applicant with processes in one or more of these categories must report quantitative data for (1) all of the metals, and (2) the toxic organic pollutants contained in the GC/MS fraction(s) listed for your industry category in Table 1. When you determine which industry category you are in to find your testing requirements, you are not determining your category for regulation purposes.

For all other cases, including unlisted categories, non-process wastewaters or non-required GC/MS fractions, you must indicate "believed present" or "believed absent" for each pollutant. For every pollutant you know or have reason to believe is present in concentrations of 10 ug/L or greater, you must report quantitative data. Use the form listing the Group C pollutants to indicate the status of each pollutant.

You are required to perform a screening analysis for dioxin if you use or manufacture one of the following compounds:

- a. 2,4,5-trichlorophenoxy acetic acid (2,4,5-T);
- b. 2-(2,4,5-trichlorophenoxy) propanoic acid (Silvex, 2,4,5-TP);
- c. 2-(2,4,5-trichlorophenoxy) ethyl 2,2-dichloropropionate (Erbon);
- d. O,O-dimethyl O-(2,4,5-trichlorophenyl) phosphorothioate (Ronnel);
- e. 2,4,5-trichlorophenol (TCP); or
- f. Hexachlorophene (HCP).

You are also required to screen for dioxin if you know or have reason to believe that it is present in your discharge. This screening analysis must be conducted using gas chromatography with an electron capture detector. A 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) standard for quantization is not required.

Table 1. Group C: Testing Requirements for Toxic Organic Pollutants by Industry Category

Industry Category	GC/MS Fraction <sup>1</sup>			
	Volatile	Acid	Base/Neutral	Pesticide
Adhesives and sealants	X	X	X	-
Aluminum forming	X	X	X	-
Auto and other laundries	X	X	X	X
Battery manufacturing	X	-	X	-
Coil coating (can making)	X	X	X	-
Copper forming	X	X	X	-
Electric and electronic components	X	X	X	X
Metal finishing/electroplating	X	X	X	-
Explosives manufacturing	-	X	X	-
Foundries (metal molding and casting)	X	X	X	-
Gum and wood chemicals	X	X	X	X
Inorganic chemical manufacturing	X	X	X	-
Iron and steel manufacturing	X	X	X	-
Leather tanning and finishing	X	X	X	X
Mechanical products manufacturing	X	X	X	-
Nonferrous metals manufacturing	X	X	X	X
Organic chemicals manufacturing	X	X	X	X
Paint and ink formulation	X	X	X	X
Pesticides	X	X	X	X
Petroleum refining	X	X	X	X
Pharmaceutical preparations	X	X	X	-
Photographic equipment and supplies	X	X	X	X
Plastic and synthetic fibers manufacturing	X	X	X	X
Plastic processing	X	-	-	-
Porcelain enameling	X	-	X	X
Printing and publishing	X	X	X	X
Pulp and paperboard mills	X	X	X	X
Rubber processing	X	X	X	-
Soap and detergent manufacturing	X	X	X	-
Steam electric power plants	X	X	X	-
Textile mills	X	X	X	X
Timber products processing	X	X	X	X

X = Testing required

- = Testing not required

1 = The pollutant in each fraction are listed in Group C

Small Business Exemption

An applicant which quantifies as a small business may be exempt from reporting quantitative data for the organic toxic pollutants (pollutants listed under the four GC/MS fractions in Group C). An applicant may qualify if its gross annual dollar sales average less than \$100,000 per year (in second quarter 1980 dollars). Applicants who feel they qualify should submit a request to Ohio EPA. The toxicity of the pollutant will be considered in making a decision to exempt an applicant from this requirement.

Group D

List any pollutants in Table 2 that you know or have reason to believe to be present in your discharge and explain why you believe each to be present. No analysis is required, but if you have analytical data, you must report it. List these and provide an explanation on a separate sheet of paper and attach it to your application.

Table 2. Group D: Toxic Pollutant and Hazardous Substances Required to be Identified by All Applicants if Expected to be Present

<b>Toxic Pollutant</b>	
Asbestos	
<b>Hazardous Substances</b>	
Acetaldehyde	Kelthane
Allyl alcohol	Kepone
Allyl chloride	Malathion
Amyl acetate	Mercaptodimethur
Aniline	Methoxychlor
Benzonitrile	Methyl mercaptan
Benzyl chloride	Methyl methacrylate
Butyl acetate	Methyl parathion
Butylamine	Mevinphos
Captan	Mexacarbate
Carbaryl	Monoethyl amine
Carbonfuran	Monomethyl amine
Carbon disulfide	Naled
Chlorpyrifos	Napthenic acid
Coumapous	Nitrotoluene
Cresol	Parathion
Crotonaldehyde	Phenolsulfonate
2,4-D (2,4-Dichlorophenoxyacetic acid)	Phosgene
Diazinon	Propargite
Dicamba	Propylene oxide
Dichlobenil	Pyrethrins
Dichlone	Quinoline
2,2-Dichloropropionic acid	Resorcinol
Dichlorvos	Strontium
Diethyl amine	Strychnine
Dimethyl amine	Styrene
Dinitrobenzene	2,4,5-Trichlorophenoxyacetic acid
Diquat	Tetrachlorodiphenyl ethane
Disulfoton	2-(2,4,5-Trichlorophenoxy) propanoic acid
Diuron	Trichlorofon
Epichlorohydrine	Triethanolamine
Ethion	Triethylamine
Ethylene diamine	Triemethylamine
Ethylene dibromide	Uranium
Formaldehyde	Vanadium
Furfural	Vinyl acetate
Guthion	Xylene
Isoprene	Xylenol
Isopropanolamine	Zirconium