

# CITY OF DAYTON - INDUSTRIAL PRETREATMENT PROGRAM

## INSTRUCTIONS - for the “Report on Compliance with Categorical Pretreatment Standards Deadline” (90-Day Report)

### 1. What is a “Report on Compliance with Categorical Pretreatment Standard Deadline” (90-Day Report)?

This report is required for each newly permitted facility or process that is regulated as a categorical industrial under the National Industrial Pretreatment Program. The report is required to be submitted **no later than 90 days** from the date of first discharge of the new categorical process (thus referred to as the **90-Day Report**). The report must:

- a. contain accurate flow information for each process, unregulated, and dilute wastewater discharge to the sanitary sewer. The flow information must be adequate to evaluate the proper application of the combined wastestream formula, as specified in 40 CFR 403.6
- b. provide results of sampling and analyses that demonstrate that applicable pretreatment limits are being met, or if limits are not being met
- c. provide those additional measures that will be taken to attain compliance, along with a schedule showing the shortest time by which such measures will be provided.

### 2. When to collect samples

Samples are to be collected after a new categorical process has been started, to show that the discharge to the sewer complies with all applicable regulations and limits. Samples should be collected at a time after initial process start-up procedures and fine-tuning have been completed, when the process and any wastewater pretreatment is operating routinely. Samples must be collected far enough in advance that results can be obtained and submitted within the 90-day deadline.

Samples must be collected for at least one 24-hour period that is representative of the regulated process wastewater discharge.

### 3. What to Sample

The samples to be collected for the 90-day report are generally the same as those specified for routine monitoring requirements in the Administrative Order issued by the City. The Administrative Order specifies which processes must be sampled and where the samples are to be collected. Sufficient samples must be collected to demonstrate that all applicable regulations and limits are being met, including Total Toxic Organics (TTO). An actual TTO analysis must be conducted; however, TTO sampling need only be done for those TTO's which would reasonably be expected to be present in the wastestream. Certification in lieu of TTO testing is not permitted for the 90-day report. The City may have conducted its own TTO analyses that could be used to meet the TTO analysis requirement – contact one of the City's Industrial Pretreatment Coordinators.

#### 4. How to Sample

Samples should be collected over a representative 24-hour period, using a flow-proportional composite sampler whenever possible. Samples for pH, Cyanide, and the Volatile Organic Compounds (VOC's or Volatiles) component of the TTO analysis must be collected by taking a minimum of four individual grab samples throughout the 24 hour monitoring period. pH readings must be taken immediately after each grab is taken.

All sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. Where 40 CFR part 136 does not contain sampling or analytical techniques for the pollutant in question, or where part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analysis shall be performed by using analytical methods or other applicable sampling and analytical procedures approved by the City of Dayton.

#### 5. Measurement of Flows

The flow of regulated process wastewater to the sewer must be accurately measured and reported. If the Administrative Order issued by the City utilizes the Combined Wastestream Formula (CWF) to determine applicable discharge limits, then flow measurements must be taken and reported for each wastestream utilized in the CWF. The measured flows should represent the normal flows to be generated by, and discharged from, the facility. **With prior approval**, the City may allow verifiable estimates of these flows, where justified by cost or feasibility considerations. Regulations pertaining to the CWF can be found in 40 CFR 403.6.

#### 6. Reporting of Results

Use the attached 3-page 90-Day Report form to report results of flow monitoring, sampling and analysis. If more than one process must be sampled, or if samples are collected for more than one 24-hour period, copy the sampling and analysis reporting table, and use a separate sheet for each process and for each day. If samples have been collected for more than one day in a month, average the results for each sample day during the month, and write those averages in the appropriate spaces where the table calls for monthly average results. If there has been only one sample day in a month, then the monthly averages and the daily results will be the same number.

All parameters in the Sampling and Analysis Data Sheet (except for pH) should be reported in **milligrams per liter (mg/L)**. Results you receive from a laboratory may be given in micrograms per liter (*ug/L*). If a result is in *ug/L*, divide it by 1000 to convert it to mg/L.

Before submitting the report, make a copy for your records.

#### 7. Questions on Completing the Report

If you have any questions on completing the 90-day report, please do not hesitate to contact your Industrial Pretreatment Coordinators at 937-333-1501.

**Report on Compliance with Categorical Pretreatment Standards Deadline  
(90-day Report)                      40 CFR 433 - Metal Finishing  
City of Dayton Industrial Pretreatment Program**

1. **Company Name:** \_\_\_\_\_

2. **Location:** \_\_\_\_\_

**3. WASTEWATER DISCHARGE FLOWS**

On the following table, provide information showing the measured flow, in gallons per day, to the sanitary sewer. **With Prior Approval**, the City may allow for verifiable estimates of these flows where justified by cost or feasibility considerations.

Describe Regulated Processes (Categorical) discharged to the sewer:	Discharged:		24-hour Flow (gpd):		Continuous or Batch ?
	hours/day	days/month	Average	Maximum	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
Describe Unregulated Processes discharged to the sewer, as used in the CWF*:	Discharged:		24-hour Flow (gpd):		Continuous or Batch ?
	hours/day	days/month	Average	Maximum	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
Describe Dilute Wastewater discharged to the sewer, as used in the CWF*:	Discharged:		24-hour Flow (gpd):		Continuous or Batch ?
	hours/day	days/month	Average	Maximum	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	
			<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	<input type="checkbox"/> Actual <input type="checkbox"/> Estimate	

CWF = Combined Wastream Formula as used in 40 CFR 403.6 to determine alternative categorical limits

**4. RESULTS OF SAMPLING AND ANALYSIS (table on next page)**

On the following table, provide results of sampling and analysis identifying the nature and concentration of regulated pollutants in the discharge from **each** regulated process. Copy the table and **complete a separate page for each process** sampled and **for each day** sampled. Both daily concentration and average concentration (if applicable) must be reported. The sample must be representative of daily operations. Sampling and analysis must be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. **Complete all blocks in the table. Attach a copy of the laboratory report(s).**

**90 DAY REPORT - SAMPLING AND ANALYSIS DATA SHEET**

Person(s) taking samples:								
<b>COMPOSITE SAMPLES:</b>	Date sample started	Time sample started		Date sample ended	Time sample ended			
		<input type="checkbox"/> AM <input type="checkbox"/> PM			<input type="checkbox"/> AM <input type="checkbox"/> PM			
<b>Type of Composite:</b>	<input type="checkbox"/> Automatic sampler or <input type="checkbox"/> Individual grabs (at least 4) taken every _____ hours over a _____ hour period							
<b>Sampling Location:</b>								
<b>GRAB SAMPLES:</b>	Number 1		Number 2		Number 3		Number 4	
	Date	Time	Date	Time	Date	Time	Date	Time
Cyanide, Total								
pH								
TTO Volatiles								
<b>Sampling Location:</b>								
<b>PARAMETER</b>	Analytical Detection Limit (mg/L)	Sample Result (mg/L)	Regulatory Limit (mg/L) Daily Maximum	Sample Result (mg/L) Monthly Average	Regulatory Limit (mg/L) Monthly Average	Are Results Within All Limits?		
<b>COMPOSITE SAMPLES</b>								
Cadmium, total								
Chromium, total								
Copper, total								
Lead, total								
Nickel, total								
Zinc, total								
Silver, total								
Mercury, total								
Molybdenum, total								
<b>GRAB SAMPLES</b>	Analytical Detection Limit (mg/L)	Sample Result (mg/L)	Regulatory Limit (mg/L) Daily Maximum	Sample Result (mg/L) Monthly Average	Regulatory Limit (mg/L) Monthly Average	Are Results Within All Limits?		
<b>Cyanide, Total</b>								
Grab #1			Applies to the Daily Total Cyanide value (the average of all grab samples taken in one day).	Average all Daily Total Cyanide values obtained in one month, and provide the result below.	Applies to the Monthly Average Total Cyanide value.	Compare the Daily average and monthly average to the applicable limit.		
Grab #2								
Grab #3								
Grab #4								
Daily Cyanide, Total (average of grabs 1-4):								
<b>pH</b>	<b>Sample Result</b>	<b>Within Limits?</b>	<b>pH</b>	<b>Sample Result</b>	<b>Within Limits?</b>	<b>Regulatory Limit</b>		
Grab #1			Grab #3			Within the pH Range of 6.0 to 12.0 Standard Units		
Grab #2			Grab #4					
<b>TTO's</b>				<b>Total Toxic Organics (TTO) Instructions</b>				
<b>Volatiles</b>	<b>Sample Result (mg/L)</b>	<b>Volatiles</b>	<b>Sample Result (mg/L)</b>	Only consider individual results greater than 0.01 mg/L 1. In the "Volatiles grab" blocks at left, enter the sum of all individual Volatiles results found in each grab sample. 2. Calculate the average of the Volatiles Grabs (#1-#4) and enter the average in the block for row A. at left. 3. Sum the results of each individual TTO Base-Neutral-Acid (Semi-volatile) compound analyzed and enter the sum in the "TTO Base-Neutral-Acid" block for row B. at left. 4. Sum the values in rows A. and B. and enter the sum in the "Total Toxic Organics" block for row C. at left. Compare this value with the regulatory limit of 2.13 mg/L.				
Grab #1		Grab #3						
Grab #2		Grab #4						
<b>A.</b>	<b>Average of Volatiles Grabs #1 - #4:</b>							
<b>B.</b>	<b>TTO Base-Neutral-Acid:</b>							
<b>C.</b>	<b>Total Toxic Organics (sum of A+B):</b>							
<b>Is Result Within Regulatory Limit of 2.13 mg/L?</b>								

**5. CERTIFIED STATEMENT**

Pretreatment standards  are,  are not being met on a consistent basis. If pretreatment standards are not being met on a consistent basis, state below whether additional operation and maintenance of existing pretreatment or additional pretreatment or both is required to meet the categorical pretreatment standards and requirements.

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Provide a schedule showing the shortest time by which you will provide such additional measures. Attach on additional sheet.

“ I certify under penalty of law that I have personally examined and I am familiar with the information in this report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.”

\_\_\_\_\_  
(Printed Name of Authorized Representative)

\_\_\_\_\_  
(Signature of Authorized Representative)

\_\_\_\_\_  
(Date)