



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
WATER

JUL 21 1983

MEMORANDUM

SUBJECT: Baseline Monitoring Reports

TO: Water Management Division Directors
Regions I-X

FROM: Martha G. Prothro, Director
Permits Division (EN-336) *MGP*

Baseline Monitoring Reports (BMR) are required from all industrial users of a POTW 180 days after the effective date of an applicable categorical pretreatment standard. These reports, which are analogous to NPDES permit applications, are required by 40 CFR Section 403.12(b) of the General Pretreatment Regulations. In the reports, industrial users must provide information on their production processes, water usage, discharge and compliance status. Compliance schedules are also required from all industrial users not in compliance. This information will assist the Control Authority in determining whether the industrial user is meeting applicable pretreatment standards on a consistent basis and, if not, whether additional operation and maintenance, additional treatment by the industrial user, or both is required for consistent compliance.

A number of categorical standards have been promulgated. BMRs are already due for 9 industries. EPA has a responsibility especially in the early stages of implementation of the pretreatment program, to provide leadership in ensuring that BMRs are submitted by the industrial users to their appropriate Control Authority.

I request that you and your pretreatment staff review the attached draft strategy paper on BMRs and submit comments to Dr. Gallup of my staff by August 19. If you believe that this strategy is inappropriate for any State in your Region, please give the name of the State and any alternate approach that might be suitable.

I would appreciate your help in expediting review and comment on this strategy. Please call me or Jim Gallup at FTS 755-0750 if you have any questions.

Attachments

cc: Pretreatment Coordinators

ATTACHMENT I

NATIONAL STRATEGY FOR IMPLEMENTATION OF CATEGORICAL INDUSTRY BASELINE MONITORING REPORT (BMR) RESPONSIBILITIES

Introduction

The Control Authority is responsible for administering the requirements of the General Pretreatment Regulations directly against affected industries. The Control Authority is defined as: 1) the POTW if the POTW's pretreatment program submission has been approved, or 2) the Approval Authority (EPA Regional office or State if EPA has delegated pretreatment authority to the State) if the POTW program has not been approved. Accordingly, the approximately 1700 POTWs nationwide required to develop pretreatment programs must establish BMR procedures in their program and implement their responsibilities as soon as their program is approved. However, the Approval Authority is also the Control Authority for all industries located in areas that will not be regulated by a local pretreatment program. While this may involve a small number of industries compared to the total number controlled by the 1700 POTWs, there are a significant enough number to require advanced planning to assure the EPA Regions and delegated States are regulating these dischargers in accordance with applicable requirements.

Because EPA Regions and delegated States must assume Control Authority responsibilities for industries in areas not covered by a local program, EPA and States generally will not routinely deal with Industrial Users (IUs) located in POTWs developing programs. However, in situations where a POTW is not making satisfactory progress in developing a program or an approved POTW is experiencing problems in dealing with an IU of its system, EPA or State assistance may be necessary.

Figure 1 shows a schematic of the implementation strategy for Control Authority responsibilities. The basic approach is that EPA and approved States deal directly with categorical industry indirect dischargers only where no local program is (or will be) required. In areas where a local program is required, EPA and States should issue guidance to the POTWs and exercise oversight responsibilities to ensure that POTWs carry out their local programs. The success of this approach depends largely on the quality of the overview of the local pretreatment program.

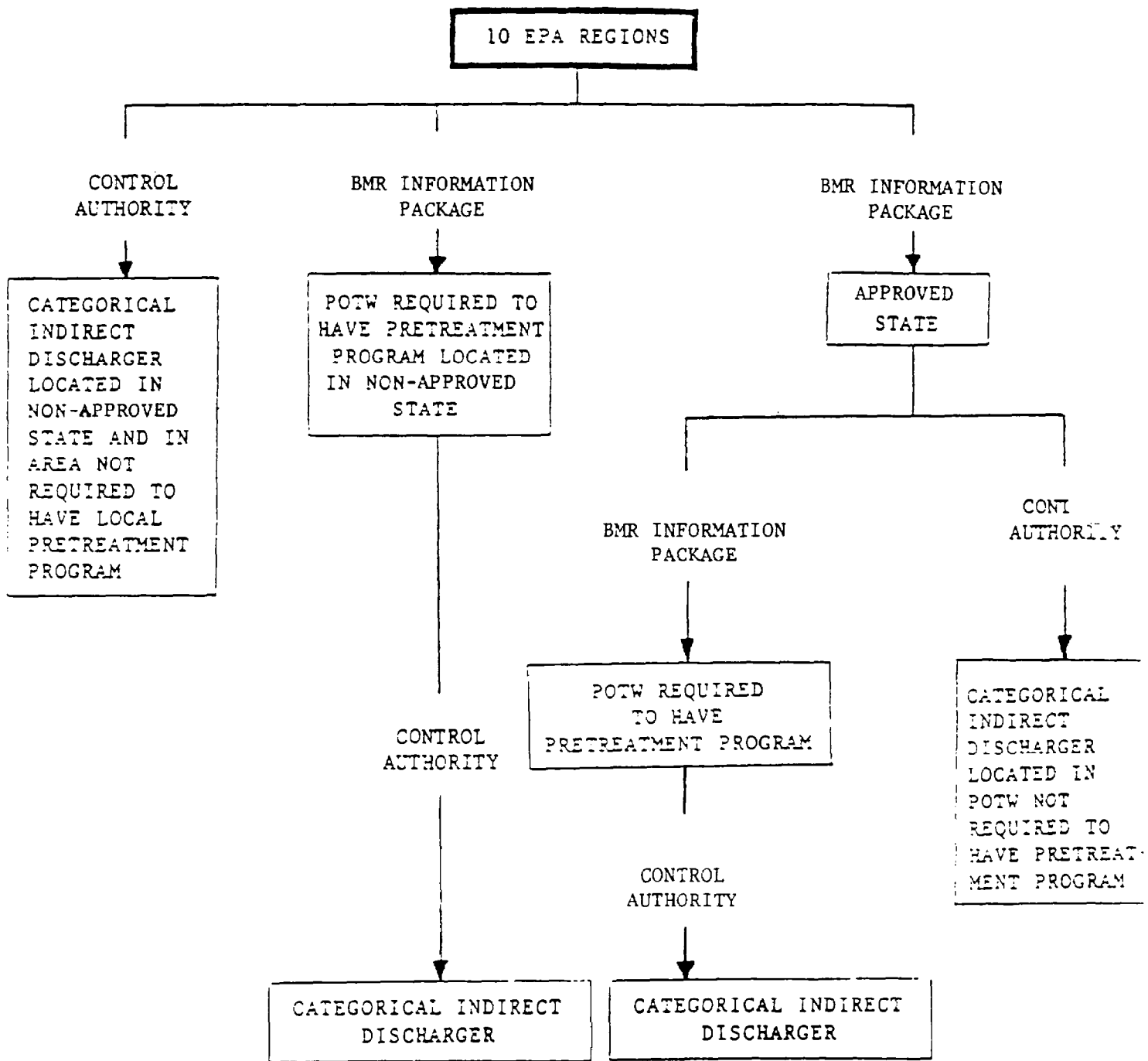
I. Summary of BMR Requirements

A. Control Authority Requirements.

The relevant requirements applicable to the Control Authority are as follows:

FIGURE 1

IMPLEMENTATION OF BMR CONTROL AUTHORITY RESPONSIBILITIES





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MEMORANDUM

SUBJECT: Baseline Monitoring Reports

TO: Water Management Division Directors

FROM: Bruce R. Barrett, Director
Office of Water Enforcement
and Permits (EN-335)

Baseline Monitoring Reports (BMR) are required from all industrial users (IU) of a POTW 180 days after the effective date of an applicable categorical pretreatment standard. Attachment I presents the strategy for implementation of the BMR. Please note that contractor assistance from JRB Associates will be available to Regions and States for this activity. After the indirect dischargers who are affected by categorical standards are identified, the most difficult and time consuming activity will be the detailed technical review of the BMR. Where the POTW is the Control Authority or where the POTW is making satisfactory progress in developing a program, this activity will be conducted by the POTW. Where EPA or approved State is the Control Authority (including where the industry is not located in a city required to develop a Federal pretreatment program), then the Region or approved State will review the report as soon as possible in accordance with priorities established for the program.

There are several methods for establishing priorities for BMR review. Some are based on the POTW, others on the IU. One possible method is a numerical POTW scale similar to the majors list for direct discharging industries. POTWs would receive a numerical rating based on the type and amount of pollutants in their discharge and possibly in their sludge. BMRs in POTW with the highest score would be reviewed first. Another possibility is based on POTWs discharging to waters with identified or suspected water quality problems associated with discharges from categorical industry users. A third method is based on the IU. IUs would receive a numerical rating based on the type and amount of pollutants in their discharge. BMRs would be reviewed first for IUs with the highest score. We recommend the following priority for BMR review:

1. IUs with higher than average numerical scores that discharge to POTWs with identified water quality problems associated with categorical industries,
2. IUs with higher than average numerical scores that discharge to POTWs suspected to contributing to water quality impairment associated with categorical industries, and
3. IUs with higher than average numerical scores that discharge to POTW with interference, pass-through or sludge contamination associated with categorical industries.

Attachment II lists the categorical industries, the number of indirect dischargers in each industry category and the date when the BMR under each regulation is due. We recommend the following priority for proceeding with the notification of the categorical industries:

1. Initiate notification for the Timber Products, Iron and Steel, Inorganic Chemicals, Petroleum Refining, Pulp and Paper, Steam Electric, Leather Tanning, Porcelain Enameling, Coil Coating, and Electrical Components industries with final numerical categorical-pretreatment standards,
2. Notify facilities in the Electroplating and Metal Finishing industry categories, and
3. Notify facilities in the following industry groups: Battery Manufacturing, Alumium Forming, Copper Forming, Foundries, Pharamaceuticals, Canmaking, Adhesive/Sealants, Electrical Components (Phase II), and Pesticides.

These priorities initially address industry categories for which standards have already been finalized. Electroplaters and/or metal finishers are equally important but the number of such facilities makes their notification a significantly larger task.

Under these priorities and the strategy presented in Attachment I, notification of industries listed in 1 above should be completed by _____, 1983 and industries in number 2 above completed by _____.

cc: Pretreatment Coordinators, Regions I-X

1. Notify Industrial Users (IUs) subject to a categorical pretreatment standard that they must submit a report containing information listed in 40 CFR 403.12(b)(1-7).
 - a. This is a requirement for POTWs with an approved local program and for States approved by EPA to implement a State program in accordance with 403.8(f) and 403.10(e). However, such notification should be given by EPA as well where it is the Control Authority.
 - b. In order to notify IUs subject to a standard, it is necessary to first have a comprehensive list of IUs identifying the category (or categories) to which each industry belongs. This is accomplished for the 1700 POTWs and 403.10(e) State programs through the required industrial waste survey. For IUs located in areas not regulated by a local program, lists must be developed from EPA and State information with cooperation from POTWs. (For more information on identification of indirect dischargers, see Section IIB.)
 - c. The BMR report must be submitted by the IU within 180 days after the effective date of a categorical standard. Therefore, notification should be given by the Control Authority as soon as possible after promulgation of a standard. The Control Authority must maintain an up-to-date knowledge of the status of categorical standards. (Attachment II lists the effective dates of the categorical standards and the due date for BMRs.)
2. Review of Baseline Monitoring Reports.
 - a. The Control Authority must insure that each BMR meets the provisions of 403.12(b)(1-7). This will require the reviewer to have the training and technical expertise to adequately evaluate the technical information presented in the BMR.
 - b. The Control Authority should respond to inadequate BMR submissions by describing the inadequacy and explaining what must be done by the IU to correct the submission.
 - c. The Control Authority should initiate follow-up actions for nonresponding IUs to obtain a complete BMR. POTW and State programs must have the authority to require IUs to submit a report.
 - d. If the BMR indicates the IU is not in compliance, a compliance schedule for actions the IU must take to achieve compliance must be submitted in the BMR. Compliance schedules must meet the requirements of 40 CFR 403.12(c) and must also be reviewed and approved by the Control Authority.

- e. Industries subject to categorical standards must submit semi-annual self-monitoring reports to the Control Authority. POTWs and States are required to establish procedures to receive and analyze these reports as well as maintain the information.
- f. All reports collected by the Control Authority from IUs and all information generated by the Control Authority in relation to categorical industry discharges must be kept on file, available to the Approval Authority for inspection and copying, for a minimum of three years.

B. Industrial User Requirements.

Categorical industries are required to submit BMRs which contain the following basic information (additional detail can be found in the regulations):

1. Name and address, including name of operator(s) and owner.
2. List of all environmental permits held by or for the facility.
3. Brief description of nature, average production rates and SIC code of the operation(s) conducted.
4. Flow measurement information for discharges to the municipal system.
5. Measurements of pollutant concentrations and/or mass.
6. Statement of certification concerning compliance or noncompliance with appropriate standards.
7. If not in compliance, a compliance schedule describing the actions the IU will take and a schedule for completing those actions.

Attachment III shows one possible BMR (including instructions) that could be included in the notification provided by the Control Authority to the IU for reporting the required information.

II. Implementation of BMR Strategy

- A. JRB will prepare a BMR Information Package for use by a Control Authority (whether POTW, State or Region). Package will include:
 1. A summary and background of Control Authority's BMR responsibilities.

2. Example Notification Package - the following information would be sent to IUs subject to standards:
 - a. A cover letter for their category.
 - b. BMR Information Requirements (with instructions).
 - c. A summary sheet of the standards for their industry.
 3. Example Notification Enforcement Letter for non-responders.
 4. Review Checklist/Comment List - guide to reviewer in assuring the necessary information has been submitted. Also provides a mechanism to respond to IUs with inadequate BMR submissions (checklist would be same for all IU categories).
 5. Example Cover Letter for Inadequate BMRs (to be returned with checklist identifying deficiencies).
 6. A summary information package on each category would be available to the Control Authority to assist reviewers in conducting technical reviews of submissions from the various categories.
 7. Summary Report Form - a format for summarizing the results of the Control Authority's BMR activities. This can be used for program management and maintaining records at the Control Authority and for reporting to the Approval Authority. Summary report instructions would be included.
- B. Identification of Indirect Dischargers Subject to Categorical Standards.
1. JRB will contact each Region or State to obtain available lists of indirect dischargers, including:
 - a. State manufacturing index (or comparable document). There is usually a fee for these indexes of \$20 to \$60.
 - b. IU list(s) that may currently be available.
 - c. Other information on IUs.
 2. JRB will compile a list of all POTWs in each Region required to develop a pretreatment program. Names of jurisdictions contributing to each POTW will be determined as accurately as possible. Where necessary, the Regional Coordinator will be asked to provide a list of all jurisdictions contributing waste to each POTW system.

3. JRB will prepare two separate lists of categorical industries who are indirect dischargers.

a. List 1 is for those categorical industries located in an area required to develop a local program (IUs grouped by POTW and IU category).

b. List 2 is for categorical industries located in an area not required to have a local program (grouped by IU category).

These two lists will be generated from the information collected in steps 1 and 2 above and is therefore only as accurate and complete as steps 1 and 2 will provide.

C. Strategy Where the POTW is the Control Authority or Where the POTW is Making Satisfactory Progress in Developing a Program.

1. JRB will prepare a mailing list, including mailing labels, of all 1700 POTWs required to develop a local program.

2. JRB will provide a BMR information package, including discussion of the Control Authorities BMR responsibilities, notification packages and corresponding List 1 IUs to the 1700 POTWs through EPA Regions and States.

D. Strategy Where EPA or Approved State is the Control Authority.

1. JRB will provide List 2 to each EPA Region. The appropriate type and number of IU notification packages will also be provided to the Regions (corresponding to the IUs on List 2).

2. The Region (or approved State) will be responsible for the following (JRB assistance may be made available to the Regions and States for these activities, if necessary):

a. Mailing appropriate notification packages to all IUs on List 2.

b. Identifying and mailing follow-up enforcement letters to IU non-responders.

c. Reviewing BMR submissions for completeness.

- d. Responding to IUs when the BMR submission is incomplete, providing comments on what must be done by the IU to complete the submission. (If appropriate, the BMR could be referred for an enforcement action.)
 - e. Conducting a technical review of the BMRs (and compliance schedule, when necessary). The Regional technical review of the BMR will be conducted as soon as possible in accordance with priorities established for the program.
 - f. Additional follow-up to any case-specific problem noted during the technical review.
3. The Regions and approved States must have the procedures to receive, track, analyze and respond to both semi-annual self-monitoring reports and compliance schedules submitted by IUs. Regions (and approved States) will be requested through OWOGAS to send a BMR status report to EPA HQ containing the following information for IUs where EPA (or an approved State) is the Control Authority.
- a. Number of POTWs that notify categorical industries of BMR pretreatment requirements.
 - b. For IUs required to submit BMRs for which EPA (or approved State) is the Control Authority, percent of BMRs received and percent approved.
 - c. Number of IUs inspected to verify BMR submission.
 - d. Percent of IUs in compliance with categorical standards.
 - e. Number of IU enforcement actions resulting from BMR submissions.
 - f. Special problems or comments regarding evaluation or approval of BMRs.

Attachment II

Summary Table National Categorical Pretreatment Standards: Milestone Dates

<u>Industry Category</u>	<u># of Indirect Dischargers</u>	<u>Promulgation Date</u>	<u>Effective Date</u>	<u>BMR Date</u>	<u>Compliance Date</u>
Timber	47	1-26-81	3-11-81	9-7-81	3 yrs. from eff. date
Electroplating	10,200	9-7-79	3-30-81	Non-Integ. 9-26-81 Integrated 6-25-83	Non-Integ. 4-27-84 Integrated 6-30-84
Iron and Steel	96	5-27-82	7-10-82	4-6-83	7-10-85
Inorganic Chemicals I	44	6-29-82	8-12-82	5-9-83	8-12-85
Petroleum Refining	53	10-18-82	12-1-82	5-30-83	12-1-85
Pulp, Paper, Paperboard	250	11-18-82	1-3-83	7-2-83	7-1-84
Steam Electric	93	11-19-82	1-2-83	7-1-83	7-1-84
Leather Tanning	140	11-23-82	1-6-83	7-5-83	11-25-85
Porcelain Enameling	89	11-24-82	1-7-83	7-6-83	11-25-85
Coil Coating I	32	12-1-82	1-17-83	7-16-83	12-1-85
Electrical Components I	240	4-8-83	5-19-83	11-15-83	See note 1 below
Metal Finishing	10,200 ¹	7-29-83	8-29-83	2-25-84	See note 2 below
Battery Manufacturing	190	6/83	8/83	2/84	8/86
Aluminum Forming	59	7/83	9/83	3/83	9/86
Copper Forming	32	7/83	9/83	3/83	9/86
Foundries	360	8/83	10/83	4/84	10/86
Pharmaceuticals	270	9/83	11/83	5/84	11/86
Coil Coating (Carmaking)	32 ²	10/83	12/83	6/84	12/86
Adhesives/Sealants	?	11/83	1/84	7/84	1/87
Electrical Components II	240 ³	11/83	1/84	7/84	1/87
Pesticides	38	12/83	2/84	8/84	2/87

<u>Industry Category</u>	<u># of Indirect Dischargers</u>	<u>Promulgation Date</u>	<u>Effective Date</u>	<u>BMR Date</u>	<u>Compliance Date</u>
Nonferrous Metals I	63	1/84	3/84	9/84	3/87
Organic Chemicals	470	3/84	5/84	11/84	5/87
Inorganic Chemicals II	44 ⁴	6/84	8/84	2/85	8/87
Nonferrous Metals II	63	6/84	8/84	2/85	8/87
Nonferrous Metals Forming	?	6/84	8/84	2/85	8/87

- Footnotes:
- 1 Indirect dischargers in metal finishing industry category are the same sources in electroplating category.
 - 2 The 32 indirect dischargers are the same indirect sources in the coil coating category.
 - 3 The 240 indirect dischargers in electric/electronic component II category are the same sources in the electric/electronic component I category.
 - 4 The 44 direct dischargers in inorganic Chemicals II are the same sources in the inorganic Chemicals I category.

- Note:
1. The compliance date for the arsenic PSES in the electronic crystal subcategory is November 8, 1985. If EPA cannot modify the Consent Decree in NRDC v. Train, 12 ERC 1833 (D.D.C. 1979), the compliance date for the arsenic PSES will become June 30, 1984. The compliance date for TIO PSES in both subcategories is July 1, 1984.
 2. The compliance date for Metal Finishing PSES is February 15, 1986 for metals and cyanide. Metal Finishing PSES establishes two levels of toxic organic control; the less stringent must be met by June 30, 1984 for most plants and by July 10, 1985 at plants also subject to Part 420 (Iron and Steel); the most stringent must be met by February 15, 1986.

INFORMATION REQUIREMENTS FOR
BASELINE MONITORING REPORT

Facility Name _____ Owner/Operator _____
 Address _____ Address _____

I. Information Already Submitted

- 1) Has a baseline report containing information listed below already been submitted for this facility?
 YES NO If "yes," provide date of submission and the agency submitted to _____
- 2) Has your firm supplied the information presented below to your local sewage agency (in response to the sewage agency's requirement to conduct an industrial waste survey as part of their pretreatment program)?
 YES NO If "yes," state date of your submission and the agency requesting the information _____

If the answer is "yes" to either or both questions above, then do not answer the following questions. Instead, attach a copy of your previously submitted material to this form and return.

II. Baseline Monitoring Report Information

- 1) Briefly describe the products produced and manufacturing process used in your operation _____

- 2) Production Rate: _____ 3) SIC Code: _____

- 4) Facility Diagram: Attach a copy of your facility flow schematic diagram of all regulated process, including points of discharge to the sanitary sewer system.

5) Wastewater Flow Measurement:

Regulated Process (Type)	Daily Average (gal/dav)	Daily Maximum (gal/dav)	Estimated (E) or Measured (M)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Non-Regulated Process (Type)	Daily Average (gal/dav)	Daily Maximum (gal/dav)	Estimated (E) or Measured (M)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- 6) Measurement of Pollutants: Attach the most recent results from the sampling and analysis during normal working hours of all regulated process streams including the following information:

- a. Sample Type (i.e., flow proportional, composite, grab)
- b. Frequency of Samples
- c. Time, date, and location of sampling event
- d. Method of analysis
- e. Comparison of results with applicable pretreatment standards
- f. If alternate limits (i.e., combined wastestream formula) are calculated, include the limit and all supporting data

- 7) Certification: Are pretreatment standards for your industry being met on a consistent basis by this facility? YES NO If "yes," go on to Question 9.

- 8) If answer to number 7 is "no," will additional pretreatment and/or operations and maintenance be required for this facility to meet pretreatment standards? YES NO If "no," explain reason for non-compliance _____
 If "yes," attach a description of the required pretreatment and/or operations and maintenance to gain compliance, and include schedule of dates for commencement and completion of events leading to the construction and operation of this additional pretreatment.

- 9) List any other environmental control permits held by this facility:

* If using combined wastestream formula

I have personally examined and am familiar with the information submitted on this form and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, as dictated by 40 CFR 403.12 (b).

Signature of Official _____ Date _____

INSTRUCTIONS FOR BASELINE MONITORING REPORT

General

Both the facility name and address and the owner or operator name and address should be given.

Specific Questions

- I.1. If yes is answered to this question, be sure to attach a copy of the material you submitted.
- I.2. See instructions for Question 1.
- II.1. Briefly describe the nature of business or service performed at this facility. This description should include all manufacturing processes, including those not related to the categorical industry (use additional sheets if necessary).
- II.2. Give the production rate of this facility (usually given as an annual average production or monthly average).
- II.3. Provide the appropriate Standard Industrial Classification (SIC) code for this facility.
- II.4. Self-explanatory.
- II.5. Provide average and maximum waste flows from all regulated process streams. If process wastestreams are combined either with other process wastestreams or non-process (sanitary, cooling water, etc.) wastestreams, these individual flowrates should be given.
- II.6. Each industrial user will sample, analyze and report on all regulated pollutants specific to each process (refer to appropriate subcategory in regulations for specific pollutants). An attachment should be provided indicating the types of samples (i.e., grab, composite, flow proportioned) the frequency and number of samples, time date and locations of the sampling events, and certification that the method of analysis meets the regulatory requirements. The facility must ascertain whether it can meet the 30-day average, calculated average, daily maximum or calculated maximum limit.

All pretreatment standards are process related and a facility must comply with the standard at the end of each regulated process. However, EPA recognizes that many facilities combine their wastewater process lines, cooling water, and sanitary wastes prior to treatment or discharge to municipal sewers. Hence, a facility can sample at a combined point, but will need to adjust the categorical limit by employing the Combined Wastestream Formula which is contained in Section 403.6(e) of the General Pretreatment Regulations (Federal Register January 28, 1981). If this is the case with your facility, you must employ the formula and provide all additional data used for calculations. For further explanation, please refer to 40 CFR 403.6(e).

- II.7. If answer was yes, skip Question 8, and go on to Question 9.
- II.8. An explanation is needed describing how the facility intends to meet Categorical Standards. If additional pretreatment and/or operations and maintenance are required, then an attachment must be provided describing the proposed system and a schedule of dates for commencement and completion of events leading to the construction and operation of the system.
- II.9. Any other environmental control permits (i.e., NPDES, hazardous material, etc.) held by this facility must be listed.