





IDEM Update
WITtec Conference
Wednesday, April 20, 2011

Becky Ruark, IDEM Wastewater Inspector
Natalie Maupin, IDEM Pretreatment
Compliance Coordinator



DMRQA


- U.S. EPA's laboratory proficiency testing program
 - Indiana's Mayflower program no longer exists
- Permittee receives notification to participate in February or March
- New schedule for participation







DMRQA


- Major facilities participate annually
- Minors will participate on a 3 year rotating basis
 - 2011 – minor municipals
 - 2012 – minor mixed ownership facilities and state facilities (mobile home parks, schools, rest areas, & state parks)
 - 2013 – minor industrials and pretreatment industries (state issued permits)



DMRQA Reporting


- March
 - Submit address verification form to IDEM
 - Notify any contract labs of requirement to participate
 - Order proficiency testing (PT) samples from an accredited PT provider for in-house laboratory





DMRQA Reporting (continued)


- March to June
 - Perform analyses and submit results to the PT provider
- August
 - Permittee must submit NPDES Permittee Data Report Form (form 6400-01) and the completed checklists to IDEM
- September
 - Complete corrective action required for any not acceptable results



NPDES Permittee Data Report Form

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EPA Contract No. 2001-BQ-01 Approval Expires 8/31/2014



ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460
Laboratory 6400-01 Evaluation Study 31
Laboratory Performance Evaluation
Office of Enforcement and Compliance Assurance
(This data are collected under the authority of the Federal Water Pollution Control Act)

NPDES Permittee Data Report Form

Due August 19, 2011 **Attention:** Follow the instructions on the previous page to complete this form and to enter data for evaluation.

State: NPDES Permit Number: Permit Extension:

Permittee name:

Current Permittee mailing address:

City: State: Zip Code:

Phone Number: FAX Number:

e-Mail:

For DMRQA Study 31, conducted in 2011, the Permittee owned and that their laboratory(ies) performing the required analyses.

Received PF Samples: Yes No Submitted Complete and Accurate Data: Yes No Received a Graced Report by July 22, 2011: Yes No

Certification by Permit Holder or Authorized Representative
(per 40 CFR Section 122.22 - see instructions)

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 managed the system or those persons directly responsible for gathering the information, I believe that the information submitted is true and correct. I understand that anyone who furnishes false or misleading information on this report or who omits material or information requested on the report may be held liable for the consequences under applicable laws. I understand that anyone who furnishes false or misleading information on this report or who omits material or information requested on the report may be held liable for the consequences under applicable laws. I understand that anyone who furnishes false or misleading information on this report or who omits material or information requested on the report may be held liable for the consequences under applicable laws.


Name of Certifying Official: Title:

Signature: *Chris Operator* Date:

Address (other than street view of existing plant) (see request for address form above):
Address: Phone No.:


City: State: Zip Code: E-mail:

EPA 6400-01 Rev. 11-10. Permittee edition available. Page 14




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NPDES Permittee Data Report Form

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Washington, DC 20460
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Permittee name: Exampleville WWTP State: IN NPDES Permit No.: 0011111 Permit Extension:

Identification of all CHEM, MICRO and WET laboratories who did analyses for this permit

Name of Laboratory	Address of Laboratory	U.S. EPA Lab Code	Lab Analysis Check boxes (check one)			Lab Type*	State-certified Laboratory**
			Chem	Micro	WET		
Exampleville WWTP	111 Main St Exampleville, IN 11111	INCO111	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	G	<input type="checkbox"/>
Contract Lab, Inc.	1212 Main St. Contractville, IN 12121	INCO121	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	C	<input type="checkbox"/>
Biomonitoring Lab, Inc.	131 Main St. Bioville, IN 13131	INCO131	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	C	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>


* Lab Types: C = Commercial F = Federal G = Local Government I = Industrial O = Other S = State
** See Facsimile 2 on DWR-04 Study 31 Fact Sheet

DPF LAD-01 Rev. 11-10. Please call us at 1-800-424-6343. Page 15



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Chemistry/Microbiology Analyte Checklist

- Page 16
 - Must have a copy of this form for each lab that performed analysis on your behalf
 - Must be signed by a responsible official

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Permittee name: Exampleville State: IN NPDES Permit No: CO11111 EPA Lab Code: INCO131

WET Organisms/Test Conditions/End Points Checklist
DMR-QA Study 31

Analyte Number	Organism / Condition	Methods	Total Required	Laboratory's Graded Result			Adequately Met (See Note 1)
				Accurate	Precise	Reliable	
Test Code 1 (EPA Method 2000)							
974	Fecal coliform (Membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 1A (EPA Method 2000)							
975	Fecal coliform (Membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 1B (EPA Method 2000)							
976	Fecal coliform (Membrane filtration)	NOCC SURVIVAL	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
977	Fecal coliform (Membrane filtration)	IC50 (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
978	Fecal coliform (Membrane filtration)	NOCC (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 1C (EPA Method 2000)							
979	Fecal coliform (Membrane filtration)	NOCC SURVIVAL	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
980	Fecal coliform (Membrane filtration)	IC50 (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
981	Fecal coliform (Membrane filtration)	NOCC (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 1D (EPA Method 2000)							
982	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2 (EPA Method 2000)							
983	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2A (EPA Method 2000)							
984	Coliforms (membrane filtration)	NOCC SURVIVAL	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
985	Coliforms (membrane filtration)	IC50 (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
986	Coliforms (membrane filtration)	NOCC (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2B (EPA Method 2000)							
987	Coliforms (membrane filtration)	NOCC SURVIVAL	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
988	Coliforms (membrane filtration)	IC50 (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
989	Coliforms (membrane filtration)	NOCC (24 HOURS)	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2C (EPA Method 2000)							
990	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2D (EPA Method 2000)							
991	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2E (EPA Method 2000)							
992	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2F (EPA Method 2000)							
993	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2G (EPA Method 2000)							
994	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2H (EPA Method 2000)							
995	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2I (EPA Method 2000)							
996	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2J (EPA Method 2000)							
997	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2K (EPA Method 2000)							
998	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Code 2L (EPA Method 2000)							
999	Coliforms (membrane filtration)	IC50	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>


Name: Chris Operator Signature: Chris Operator Date: 8-1-11


*See Footnote 2 on DMR-QA Study 31 Test Sheet Page 17 Use a separate sheet for EACH lab used

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Lab Requirements

- There is no certification program for wastewater labs in Indiana
- All labs doing wastewater analysis for NPDES permits must use methods listed in 40 CFR Part 136 unless otherwise specified in the permit






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Lab Requirements


- Check the current version of 40 CFR 136 to make sure that method numbers on your bench sheets or in your SOPs are approved methods
- Also check results received from contract labs to assure they are using approved methods



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Lab Requirements

- Several old U.S. EPA methods are no longer approved including: 150.1 for pH, 160.2 for TSS, 405.1 for BOD, and 330.5 for Chlorine
- For most of these parameters there is a similar method listed in Standard Methods that is approved according to 40 CFR 136





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Laboratory Requirements

- Please check your methods and update your records accordingly

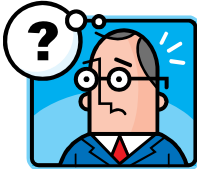




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Lab Requirements


- E. coli
 - U.S. EPA Method 1103.1 m-TEC agar is no longer acceptable for the analysis of disinfected wastewater
 - Tell a friend, feel free to pass this information along and refer any questions to Becky Ruark



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Lab Requirements

- IDEM has specified the following methods as allowable for the detection and enumeration of *Escherichia coli* (E. coli):
 - Coliscan MF[®] Method
 - mColi Blue-24[®]
 - Colilert[®] MPN Method
 - U.S. EPA Method 1603 Modified m-TEC agar




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Wastewater Operator Certification Exams

- Exam Dates
 - April 28, 2011
 - October 6, 2011
 - Applications must be postmarked by August 22, 2011






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Topics of Frequently Missed Questions


- Rules & regulations
 - Apprentice program
 - Meaning of certification expiration dates
 - Contact hours
- Pretreatment
- Sample holding times & preservation
- How to complete a MRO/MMR and DMR



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Wastewater Apprentice

- Apprentice applicant may take the exam before he/she has the experience and/or education to qualify to be a certified operator of a given classification
- A wastewater apprentice **cannot** be in responsible charge of a WWTP



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Wastewater Apprentice

- A wastewater treatment apprentice shall fulfill the following requirements in order to become a wastewater treatment certified operator:
 - Meet the educational and experience requirements applicable to the class of wastewater operator the apprentice is applying to become




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Wastewater Apprentice (continued)

- Fulfill the continuing education credit requirement
- Complete and submit a completed certification application, with the necessary fee, to the commissioner not later than **six years** after the date of successfully completing the examination.






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Wastewater Apprentice (continued)

- If an apprentice does not fulfill the requirements of this subsection and receive certification as a wastewater operator, then the person must retake the exam in order to apply for the wastewater treatment operator certification

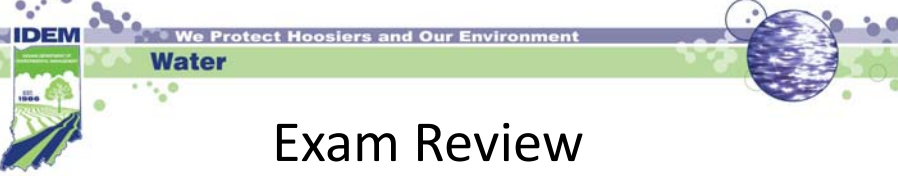


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Wastewater Apprentice


- A certified wastewater operator may concurrently be a wastewater apprentice at a higher classification
 - For example, Joe is a Class B operator. He works in a Class B WWTP. He does not have any responsible charge experience, but hopes to be promoted into a supervisory position soon. He applies and passes a Class C exam as an apprentice. He gets the promotion and is in responsible charge for two years. When he has acquired the necessary experience and earned the required continuing education he submits an application and fees and becomes a Class C wastewater operator.



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Exam Review


- This is a good opportunity to see what questions you missed
 - Determine if there is a specific category of material that you need to spend more time studying
- You have an opportunity to challenge questions that are incorrect



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Exam Review (continued)



- Review period runs from the date you are notified of failing score up to 90 days before the next scheduled exam
 - Review period for April 28, 2011 exam will end July 8, 2011
- Must notify IDEM in writing that you wish to review your exam



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Exam Review (continued)


- Examination review does **not** include the right to copy, by any means, the examination or any portion of it.




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Electronic Reporting of NPDES Data


- eDMR is not currently accepting any new users
 - This program is expected to be replaced soon
- NetDMR is not yet available for use in Indiana
 - Currently negotiating with U.S. EPA on electronic signature requirements






TTO Reporting Guidance

- IDEM's Compliance Data Section is in receipt of many reports where TTO is incorrectly reported
- The guidance document was developed to help facilities to correctly report TTO on the DMR and MMR



TTO Reporting Guidance



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment
 Michael C. Dunbar, Jr.
 Governor
 Thomas W. Zancini
 Commissioner

100 North Senate Avenue
 Indianapolis, Indiana 46204
 (317) 232-3622
 Toll Free (800) 461-6027
www.idem.in.gov

November 15, 2010

Total Toxic Organics (TTO) Reporting Guidance for IUs subject to 40 CFR 413 and 40 CFR 433:

The following is guidance for IUs required to monitor for TTO semi-annually. It describes the procedure for determination of which to report on the DMR and MMR based on the information on the lab report.

If all values are Non-Detect, then the facility should report as less than (<) the limit of detection for the parameter on the list with the highest detection limit.

For example, the lab report is as follows:

Hexachlorocyclopentadiene	<10 µg/L	(0.4 mg/L)
Hexachlorobenzene	<10 µg/L	(0.05 mg/L)
Chlorobenzene	<10 µg/L	(0.05 mg/L)

All are below detection limit, therefore the reported value should be <0 mg/L. Please keep in mind that all the report will have a value reported in µg/L (ppb), not mg/L (ppm). You will have to do the conversion since the permit limit is stated in mg/L.

If the lab report has values that are detectable, the permit holder must report a summation of all quantifiable values greater than 0.01 mg/L from their lab results.

For example, the lab report is as follows:


Hexachlorocyclopentadiene	230 µg/L	(0.53 mg/L)
Hexachlorobenzene	10 µg/L	(0.05 mg/L)
Chlorobenzene	100 µg/L	(0.5 mg/L)
Hexachloroethane	0 µg/L	(0.00 mg/L)
Fluorobenzene	9 µg/L	(0.09 mg/L)

The reported value would be 0.63 mg/L (0.53 + 0.10). The 0.25 does not count even though it is above 0.01 because it is a non-detect and therefore non-quantifiable. The 0.01 does not get counted toward the summation, since it is also non-quantifiable. The 0.09 does not get counted even though it is quantifiable, because it is not greater than 0.01 mg/L. Please keep in mind that the lab report will likely have values reported in µg/L (ppb), not mg/L (ppm). You will have to do the conversion since the permit limit is stated in mg/L.

Do not report (na) or (nd) (below detection limit), "N" (no direct) or "d" (discharge limit) (for example <2.3 mg/L).

If the permit holder has an approved toxic organic management plan (TOMP) on file with IDEM, they may state a certification statement and submit it rather than monitoring for TTOs twice per year (June and December).


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TTO Reporting Guidance


- Correct reporting is necessary to demonstrate compliance with the permit limit
- Incorrect reporting often leads to false noncompliance in the U.S. EPA ICIS database



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TTO Reporting Guidance

- Provides examples of how to handle data from a lab report
- IDEM requires TTO data to be reported on the DMR in mg/L
- TTO data is reported by most labs in $\mu\text{g/L}$ so you must do the conversion




For more information contact

Becky Ruark
Wastewater Inspector/Lab Proficiency
Coordinator
(317)233-2477
bruark@idem.IN.gov




Application of Total Toxic Organic
(TTO) standards.



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TTO Requirements

- The following categorical standards have specific requirements for implementing TTO monitoring and monitoring alternative requirements.
 - 40 CFR 413, Electroplating
 - 40 CFR 433, Metal Finishing
 - 40 CFR 469, Electrical and Electronic Components
- Permits must contain monitoring alternative language for the IU to be able to certify that no dumping of TTO is occurring.



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TTO Requirements

Two options for determining compliance with TTO standard.


1. Either monitor and analyze for only those pollutants reasonably expected to be present;
2. Submit a certification statement specified in 40 CFR 433.12(a). The IU must also submit a Toxic Organic Management Plan (TOMP) to its control authority (City or IDEM) for approval.

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TTO Requirements

- TOMP should specify the following:
 - The toxic compounds used at the IU;
 - The method of disposal used instead of dumping, such as reclamation, hauling, or incineration;
 - And procedures for ensuring that toxic organics do not routinely spill or leak into wastewater.



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TTO Requirements

- TOMP
 - If an IU does not use any materials that contain toxic compounds and wants to use the certification statement in lieu of monitoring for TTO, the IU must submit a TOMP for approval.
 - The TOMP would explain that no toxic compounds are on-site.

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Common Toxic Organic Sources

- Lubricants.
- Solvents.
- Surface coatings.





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Preparing a TOMP


Five Step Process



- Step 1: TTO Sample and Analysis.
- Step 2: Process Engineering Analysis.
- Step 3: Pollutant Control Evaluation.
- Step 4: Prepare TOMP.
- Step 5: Submit TOMP & Certification Statement.

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Step 1: TTO Sample and Analysis


- Sample and analyze for the toxic organic pollutants which are included in the definition for the industrial category.



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Step 2: Process Engineering Analysis


- Flow diagram to ID all wastewater sources.
- List of raw materials used in the IU processes (including chemical additives, water treatment chemicals and cleaning agents) and the wastewater stream each toxic organic could potentially enter.
- Compare TTO analysis results from step 1 with the list of raw materials.



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Step 2: Process Engineering Analysis


- Evaluate the toxics found in analysis but not on list and determine if they are formed as reaction products or by-products.
- Examine sources such as equipment corrosion or raw materials' impurities that could result in a release of toxic organics.




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Step 3: Pollutant Control Evaluation


- What can you do to eliminate a source or potential source of toxic organics from entering the wastestream?
 - In-plant modification.
 - Solvent or chemical substitution.
 - Partial or complete recycle.
 - Reuse.
 - Neutralization.
 - Operational changes.



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Step 4: Prepare TOMP

- Complete inventory of all toxic organic chemicals in use or identified through sampling and analysis from regulated process operations.
- Description of method of disposal.
- Procedures for ensuring that toxic organics do not routinely spill or leak into wastewater.
- Determinations or best estimates of the identities and quantities of the toxic organics used as well as discharged.



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Step 5: Submit Plan and Certification Statement


- Delegated programs – IU submit to City.
- Non-delegated programs – IU submit to IDEM.
- Submit certification statement found at 40 CFR 433.12(a), signed and dated by the designated IU representative.

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Confidential Information


- Concerns about trade secret information in the TOMP being released to the public.



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Confidential Information



- Claims of confidentiality must be made at the time of submission.
- Must stamp the words “confidential business information” on each page containing such information.
- If no claim is made at the time of submission, the information can be made available to the public without further notice.



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TTO Requirements

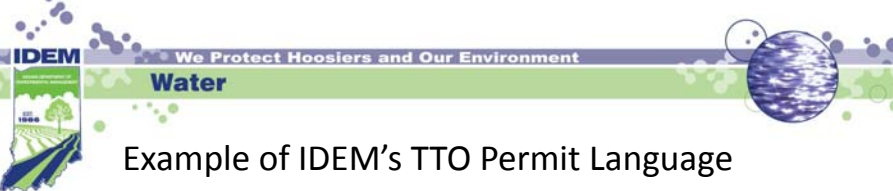
- TTO standards with Oil and Grease Monitoring Alternative:
 - 40 CFR 464, Metal Molding and Casting
 - 40 CFR 465, Subpart D, Coil Coating (can making);
 - 40 CFR 467, Aluminum Forming, and;
 - 40 CFR 468, Copper Forming.



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TTO Requirements

- These 4 categorical standards have shortened TTO lists. You may monitor for oil and grease instead of TTO or monitor for all TTO listed within the standards, not those reasonably expected to be present.



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Example of IDEM's TTO Permit Language

- TTO MONITORING REQUIREMENTS

(1) The Total Toxic Organics (TTO) limitation is defined as the summation of all quantifiable values greater than 0.01 mg/l for the toxic organic compounds listed in Table 1 ***that would reasonably be expected to be found***. The sum of all values shall not exceed the TTO limitation(s) in Part I.A.

All toxic organic samples must be collected, preserved and stored in accordance with 40 CFR 136, Appendix A. Samples for volatile organics must be analyzed within 14 days of collection. Samples for semi-volatile organics, PCBs and pesticides must be extracted within 7 days of collection and analyzed within 40 days of extraction.

Toxic organics shall be analyzed using U.S. EPA methods 624 (volatile organics), 625 (semi-volatile organics) and 608 (PCBs and pesticides) in 40 CFR 136, or other equivalent methods approved by U.S. EPA. Equivalent methods must be at least as sensitive and specific as methods 624, 625 and 608



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Example of IDEM's TTO Permit Language (cont.)

(2) Monitoring Alternative for TTO:

In lieu of monitoring for TTO, and at the discretion of the State, the permittee may make the following certification as a comment to the periodic reports required by 40 CFR 403.12(e):

"Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the State."

This statement must be signed by the signatory on the DMR.



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Example of IDEM's TTO Permit Language (cont.)


In requesting that no monitoring be required, the permittee shall submit a solvent management plan that specifies to the State's satisfaction the following conditions:

- (a) The toxic organic compounds used;
- (b) The method of disposal used instead of dumping, such as reclamation, contract hauling, incineration, etc.; and
- (c) The procedures for assuring that toxic organics do not routinely spill or leak into the wastewater.

In requesting that no monitoring be required, the permittee shall monitor for all toxic organics listed in Table 1 at least once and submit a copy of the analytical report(s) to the State. If the permittee can demonstrate compliance with the TTO limit and chooses the certification option in lieu of monitoring, the analytical report(s) shall be submitted for State approval within six months from the effective date of this permit.

If the permittee is capable of complying with the above conditions and chooses the certification option in lieu of monitoring, a solvent management plan shall be submitted for State approval within six months from the effective date of this permit.


If it is determined that monitoring is necessary to ensure compliance with the TTO limit, the permittee need analyze only for those toxic organics which would reasonably be expected to be present in the discharge.



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Questions





For more information contact

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