



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

MAY 6 1983

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Representative Sampling in NPDES Permits

TO: Water Management Division Directors

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

Martha G. Prothro

I wish to call your attention to the importance of specifying proper sampling locations in NPDES permits to assure that the toxic pollutants, especially the organic pollutants, are accurately detected and reported. Priority pollutants may not be detected when a permittee or applicant comingles or blends wastestreams prior to monitoring for the purposes of determining compliance or applying or reapplying for a permit using Form 2c "Application for Permit to Discharge Wastewater from Existing Manufacturing, Commercial, Mining and Silvicultural Operations". It is essential that the Form 2c contain analytical results truly representative of the process wastewater before dilution so that the permit may include limits on all appropriate pollutants. Careful consideration of what constitutes representative sampling for the priority pollutants is particularly important for facilities with large process and cooling water flows and for facilities that are especially complex.

For your convenience, the attachment contains an example of a standard permit condition, clarification of the phrase "representative sample" in the Form 2c Instructions, and an excerpt from the NPDES regulations authorizing internal wastestream monitoring.

Please assure that your NPDES permit writers are reminded of the importance of requiring representative sampling in both the application Form 2c and the permit. It would also be appropriate to consider this issue carefully in review of State NPDES permits. Please contact me, Bill Jordan, Chief, NPDES Technical Support Branch, or Hap Thron of his staff (426-7010) if you or your staff have questions, comments, or suggestions on how we can better assure that sampling locations are properly selected.

Attachment

cc: Bruce Barrett
Steve Schatzow
Bob Zeller

Example Standard Permit Condition

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water, or substance. Monitoring points shall not be changed without notification to and approval by, the Director.

Form 2c - Instructions

page 2c-2 bottom

- B. SAMPLING. The collection
permit, or at any site adequate for the collection
of a representative sample (emphasis added).

The phrase "representative sample" in the Form 2c instructions is defined as "after treatment and before dilution with non-process wastewater".

Environmental Permit Regulations
Final Rule-April 1, 1983

§ 122.45

(i) *Internal waste streams.* (1) When permit effluent limitations or standards imposed at the point of discharge are impractical or infeasible, effluent limitations or standards for discharges of pollutants may be imposed on internal waste streams before mixing with other waste streams or cooling water streams. In those instances, the monitoring required by § 122.44(i) shall also be applied to the internal waste streams.

(2) Limits on internal waste streams will be imposed only when the fact sheet under § 124.56 sets forth the exceptional circumstances which make such limitations necessary, such as when the final discharge point is inaccessible (for example, under 10 meters of water), the wastes at the point of discharge are so diluted as to make monitoring impracticable, or the interferences among pollutants at the point of discharge would make detection or analysis impracticable.