



Local limits sampling plan checklist

Industrial Pretreatment

Name of POTW:	
Date of review:	

Introduction

Question	Yes	No	NA	Section Ref
Does the document describe the sampling plan purpose and POTW general information?				
Does the document describe any new industrial flows since the last local limits evaluation?				

List of Pollutants to be Evaluated (EPA Local Limits Development Guidance)

Question	Yes	No	NA	Section Ref
Are all standard 15 pollutants included (arsenic, cadmium, chromium, copper, cyanide, lead, mercury, molybdenum, nickel, silver, zinc, BOD, TSS, ammonia)?				
If NO : Is there adequate discussion for pollutants not included?				
Is there adequate discussion of any Maximum Allowable Headworks Loading exceedances?				
Are all existing local limit pollutants included?				
Are all other pollutants listed in the NPDES permit included?				
Are all toxic pollutants listed in other disposal requirements (sludge, air, etc.) included?				
Are other pollutants identified in priority pollutant scans included?				
Are other pollutants identified in an applicable TMDL, or 303(d) listings included?				
If the POTW accepts oil & gas waste, does the plan address pollutants in this waste?				
If no to any of the above, is appropriate justification provided?				

Appropriate Sampling Points (EPA Local Limits Development Guidance)

Question	Yes	No	NA	Section Ref
Are there influent (prior to any recycle stream) sampling points?				
Are there effluent sampling points?				

Appropriate Sampling Points (EPA Local Limits Development Guidance) cont'd

Question	Yes	No	NA	Section Ref
Are there sludge sampling points?				
Are there background pollutant loading sampling points?				
If YES : Does this include unregulated commercial sampling points?				
If YES : Does this include industrial sampling points?				
Are there internal sampling points (Primary-influent to treatment units with inhibition criteria)?				
Is there background pollutant data for the stream/waterbody?				
Does the facility accept hauled waste?				
If YES : Are there hauled waste samples planned?				

Number of Samples (EPA Local Limits Development Guidance)

Question	Yes	No	NA	Section Ref
Will the facility be using existing data? (For example, samples collected for Pretreatment Monitoring in the NPDES permit)				
Is there at least an acceptable minimum of sample events?				
Is there an adequate sample collection frequency and schedule?				

Sample Type and Equipment (40 CFR 403.12(g)(3) and 40 CFR 136)

Question	Yes	No	NA	Section Ref
Is the facility using the correct sampling type? Specifically, is grab sampling used for required pollutants (cyanide, total phenols, volatile organics, oil and grease, sulfide, and pH)?				
Is 24-hour composite used for all others?				
If YES : is it time/flow proportioned?				
Is there a discussion of sampling equipment to be used?				

Analytical Methods (40 CFR 136)

Question	Yes	No	NA	Section Ref
Will the facility use EPA approved methods?				
Will the facility use the most sensitive methods?				
Do the methods have adequate detection levels such that the samples can be used to develop proposed limits?				

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