



St. Joseph, Missouri – Water Protection Division Industrial User Semiannual Compliance Sampling and Reporting Fact Sheet



1. Background

All Significant Industrial Users (SIU), users subject to categorical pretreatment standards, and all users issued a Wastewater Contribution Permit (Permit) are responsible for submitting periodic compliance reports (semiannual reports) to St. Joseph's Water Protection Division (Water Protection). Requirements for semiannual reports are found in facility specific permits, St. Joseph City Code §29-192, and 40 C.F.R. §403.12. It is the responsibility of all Industrial Users (IU) to understand and follow their facility's Permit conditions and requirements. This document was prepared to aid IUs with compliance for semiannual reports. This fact sheet is general in nature and shall not overrule any regulation or permit condition.

2. Reporting

All users subject to semiannual reporting shall submit reports at least twice per calendar year to determine compliance with Permit conditions and requirements. The first reporting period shall be from January 1 to June 30. The second reporting period shall be from July 1 to December 31. Any report received 30 days after the due dates listed below shall be considered in Significant Noncompliance (SNC).

- 1st Half semiannual reports are due July 31st
- 2nd Half semiannual reports are due January 31st

Reports shall include:

- Certified laboratory reports from a qualified independent laboratory, for all samples in reporting period, including:
 - Date and time of sampling
 - Exact place, method, and the name of the person(s) taking the samples
 - Dates analyses were performed
 - Who performed the analyses
 - The analytical techniques or methods used
 - The results of such analyses
- Chain-of-Custody records for all samples (see section 4)
- Documentation to determine compliance with best management practices (BMP), if applicable
- Measured daily flows; or estimated average and maximum daily flows
- Breakdown of regulated process flow, unregulated stream flow rate and dilution stream flow rates, if applicable
- IU's with limitations expressed in terms of allowable pollutant discharge per unit of production must provide actual production rates for the reporting period
- Any additional monitoring performed at the regulated sampling location more frequently than required during the 6 month reporting period
- Resample results for analyses that exceeded permitted, local, or federal limitations



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- Certification statement signed by an authorized representative of the facility:

"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 manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Water Protection has developed a fillable form to report field measurements and flow information with the above certification statement for IUs to complete with their semiannual report.

3. Sampling and Analysis

Semiannual reports must contain the results of sampling and analysis of the wastewater discharge from an IU. Analysis of such sampling must be completed by a qualified independent laboratory. Sampling must be performed during the period covered by the report (analyses submitted for the 1st half must be from samples gathered in the 1st half) and which are representative of conditions occurring during the reporting period (i.e. during production).

Sampling and analysis shall be in accordance with the techniques and procedures contained in 40 CFR §136 and amendments thereto or with any other test method approved by Water Protection.

- Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds.
- For all other samples, a flow proportional 24-hour composite sampler shall be used. Where such sampling is not feasible, grab samples or time proportional composite samples may be taken only if approved by Water Protection.

It is the IUs responsibility to ensure that all necessary parameters are sampled and analyzed during the reporting period. Independent laboratories that analyze samples based on permit requirements should have the most current permit for the user. IUs shall have the proper equipment and procedures in place to gather samples, including:

- Proper sample bottles and necessary preservatives
- Grab sampling equipment
- Automatic composite sampler
- Chain-of-Custody Forms
- Field parameter meters (pH and temperature)

IUs should plan for the necessary number of samples to be obtained during the reporting period. IUs should leave enough time between sampling and the end of the reporting period to provide time to resample in case violations, mistakes, or other unforeseen events occur.



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IUs should immediately review analytical results received from their independent laboratory. These results should be compared to the limitations found in their specific pretreatment standard (i.e. permit) to determine compliance. If sampling results indicate an exceedance of a limit, the user shall notify Water Protection, by phone, within 24 hours of becoming aware of the limit violation. The user shall also repeat sampling and analysis and submit the results of the analysis to Water Protection within 30 days after becoming aware of the limit violation.

4. Chain of Custody

Chain-of-custody (COC) procedures require an unbroken record of possession of a sample from its collection through analysis or testing, disposal, and possibly up to and during a court proceeding. The goals of COC procedures are to ensure the collected sample was the one tested and to ensure that the sample has not been tampered with or altered in any way. A sample is considered to be under a person's custody if it is in the individual's physical possession, in the individual's sight, secured and tamper-proofed by that individual, or secured in an area restricted to authorized personnel.

Elements of a proper COC procedure:

- Sample labels that include
 - Unique identifier (sample name)
 - Sample type
 - Name of collector
 - Date and time of collection
 - Place of collection
 - Sample preservative
- Sample seals to detect unauthorized tampering that include
 - Sample identifier
 - Collectors name
 - Date and time of sampling
- COC record, from lab performing analyses, that includes
 - Unique identifier for sample
 - Signature of collector
 - Date, time, and address of collection; including distinct start and end times for composite samples
 - Sample type
 - Sample preservation requirements
 - Signatures of persons involved in chain of possession and dates and times of specific transfer and possession
 - Field measurements if not reported elsewhere

5. Semiannual Report Submittal Address

St. Joseph Water Protection
Attention: Industrial Pretreatment Program
3500 State Route 759
St. Joseph, MO 64504
Phone: (816) 271-4693