



METRO WATER RECOVERY

INDUSTRIAL PRETREATMENT PROGRAM ANALYTICAL METHODS FOR POLLUTANTS WITHOUT APPROVED 40 CFR PART 136 METHODS POLICY

PURPOSE/SCOPE: This policy establishes a consolidated list of analytical methods that Metro accepts for sampling industrial wastewater pollutants that currently have no approved method under 40 CFR Part 136.

Version Number	Approved By	Effective Date
1	Bret Icenogle, Industrial Pretreatment Process Engineering Manager	August 27, 2026

Analytical Methods for Pollutants Without Approved 40 CFR Part 136 Methods Policy
August 27, 2026

1. Inspect and perform authority monitoring of each Significant Industrial User (SIU) at least annually (40 CFR § 403.8(f)(2)(v)).
2. Issue Wastewater Discharge Permits (Permits) to SIUs, including Categorical Industrial Users (CIUs), as required under 40 CFR § 403.8(f) and § 403.12. Permits include self-monitoring requirements based on applicable categorical standards. The Control Authority, responsible for implementing the IPP, enforces these requirements and approves TOMP's where applicable.

The Control Authority is defined as the entity responsible for implementing and enforcing the IPP, including permitting, monitoring, and enforcement of SIUs within Metro's service area. Per 40 CFR § 403.3(f), the term Control Authority refers to the POTW if the POTW's Pretreatment Program Submission has been approved in accordance with the requirements of 40 CFR § 403.11. Metro is the Control Authority for Industrial Users within Metro's service area.

This policy is established under Metro's authority as the Control Authority under the Industrial Pretreatment Program, consistent with:

1. 40 CFR Part 403 – General Pretreatment Regulations for Existing and New Sources of Pollution;
2. Metro's Rules and Regulations Governing the Operation, Use and Services of the System (Section 6);
3. Applicable Permit requirements issued under Metro's authority.

Metro's authority to establish analytical method requirements for pollutants without approved 40 CFR Part 136 methods is derived from its responsibilities under 40 CFR Part 403 to:

1. Ensure that Permittees comply with Permit conditions;
2. Maintain consistent, scientifically defensible monitoring and reporting procedures;
3. Protect the POTW from pass-through, interference, and other adverse impacts.

Metro may also interpret and incorporate 40 CFR Part 136 procedures for pollutants where approved methods exist, ensuring consistency with EPA guidance.

GENERAL APPROACH

Roles and Responsibilities

Metro establishes approved methods:

1. Maintain and update the Consolidated Pollutant List, ensuring it reflects current science, approved methods, and regulatory requirements under its CDPS Permits, 40 CFR Part 403, and Metro-issued Permits;
2. Approve analytical methods not listed on the Consolidated Pollutant List on a case-by-case basis, upon receipt of a written request from a Permittee;
3. Automatically adopt new or revised 40 CFR Part 136 approved methods for listed pollutants.

Table 1. Consolidated Pollutant List*.

Pollutant	Authorized Method(s)	Notes
PFAS	EPA 533; EPA 537.1 rev 2.0; EPA 1633A	—
1,4-Dioxane	EPA 624.1; SW-846 8260D; SW-846 8260D SIM; EPA 522 (modified Drinking Water)	—
Formaldehyde	EPA 8315A; EPA 1667A	—
Methyl-t-butyl ether (MTBE)	EPA 624.1; SW-846 8260D	—
Americium-241	EPA 901.1	Radionuclide
Plutonium-238	EPA EMSL-33; EPA 907.0	Radionuclide
Plutonium-239	EPA 600/7-79-0813; EPA EMSL-33; EPA 907.0	Radionuclide
Plutonium-240	EPA 600/7-79-0813; EPA EMSL-33; EPA 907.0	Radionuclide
Radium-226	EPA 901.1; HASL 300 Method Ga-01-R; EPA 903.1; EPA 904.0; SM-7500-Ra-C; SM-7500-Ra-B; EPA 903.0	Radionuclide
Radium-228	EPA 901.1; HASL 300 Method Ga-01-R; EPA 903.1; EPA 904.0; SM-7500-Ra-C; SM-7500-Ra-B; EPA Ra-05 modified; SW-846 9320	Radionuclide
Polonium-210	HASL 300 Po-01-RC; HASL 300 Po-02-RC	Radionuclide
Lead-210	EPA 901.1; DOE RP280; ASTM D7535-09	Radionuclide
Uranium	EPA 200.8 rev 5.4	Radionuclide
Nicotine	EPA 8270D	—
Flashpoint	ASTM D93 Pensky-Marten	—

*** Note to Industrial Users:**

- Some pollutants on this list may be report-only, meaning no numerical limit is currently assigned. Metro requires these analyses to understand the composition of the wastewater for consideration of future regulatory controls.
- Permittees shall use the methods listed for compliance monitoring unless prior written authorization for an alternative method is obtained from Metro.
- Table 1. is maintained as the official reference; always check the most current version when sampling.