

Virginia Division of Consolidated Laboratory Services
ENVIRONMENTAL LABORATORY CERTIFICATION PROGRAM
(1 VAC 30-45 and 1 VAC 30-46)

GUIDANCE DOCUMENT

1 VAC 30-45: Certification Requirements for Industrial Users of POTWs

April 20, 2009
Revised December 11, 2009

DCLS is issuing the following interpretation of the environmental laboratory certification program regulations for noncommercial laboratories (1 VAC 30-45). This interpretation is pertinent to Industrial Users (IUs) that discharge wastewater to a Publicly Owned Treatment Works (POTW). The Department of Environmental Quality (DEQ) issues a Virginia Pollutant Discharge Elimination System (VPDES) permit to the POTW as required by VPDES Permit Regulation (9 VAC 25-31-10 *et seq.*). POTWs control their contributing IUs through permits and their Sewer Use Ordinance which may require pretreatment of the discharge to meet limitations.

An industrial user (IU) is defined in 9VAC25-31 as a source of indirect discharge to the POTW.

DEQ approves the POTW pretreatment program for issuing permits to IUs in accordance with the VPDES Permit Regulation. The POTW provides DEQ with the IUs pretreatment monitoring results as required by their VPDES permit. The permits issued by the POTW are considered to be the same as a VPDES permit for the purposes of laboratory certification. These IU permits set discharge limits so that the POTW can meet the limits set out in the VPDES permit issued to the POTW by DEQ.

An environmental laboratory performing analysis for an IU under the Pretreatment Section of the VPDES Permit Regulation (9 VAC 25-31-730 through 900) must be certified under 1 VAC 30-45 if the laboratory is owned by the IU or by the POTW. Otherwise the laboratory performing analysis for the IU must be certified under 1 VAC 30-46.

Field testing at the site of the IU is not covered by the environmental laboratory certification program, just as field testing is not covered generally under the program.