



# Introduction to Linko Exchange

Industrial Discharge Control Section

**Marianna Eberle, Industrial Investigator**

**March 30, 2023**

# Agenda

- What is Linko Exchange (LE)?
- What will SIU/CIU be able to do in LE?
- What types of reports will be accepted electronically?
- Signatures – Wet & Electronic
- Signatory Authority
- When will LE be available?
- LE Access and Training
- Using LE
- Suggestions for Successful Transfer to LE
- Questions?

# WHAT is Linko Exchange?



Linko Exchange is a web-portal interface that will allow WSSC IDC to accept electronic reports from permitted Significant and Categorical Industrial Users (SIUs and CIUs)



# What Types of Reports Will be Accepted Electronically?

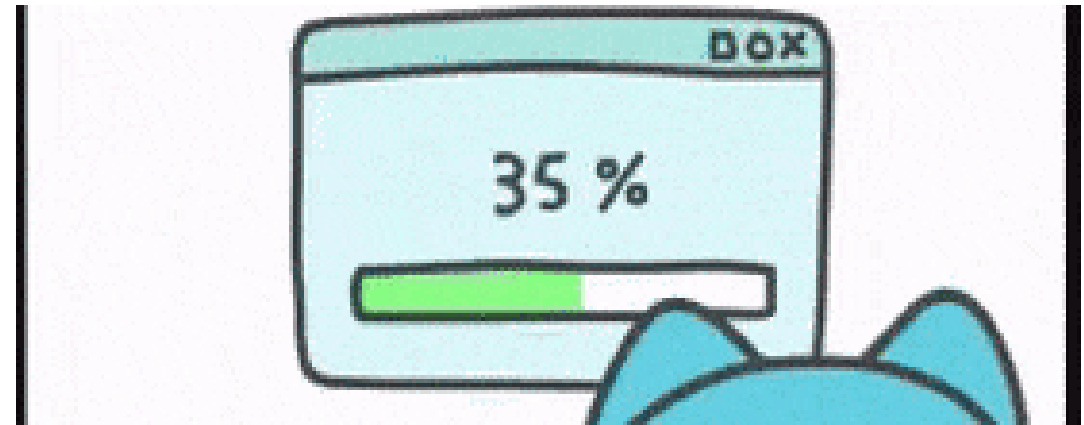
SIUs and CIUs will be able to submit:

- Periodic Compliance Reports (PCRs)/ Self-Monitoring Reports (SMRs)
- Compliance Reports (CRs)
- TTO and Cyanide Certifications, if applicable
- Grease Trap and Oil/Water Separator Service Log, if applicable
- Other routine and/or special reports, as applicable



# What Will the SIU/CIU do in the LE Portal?

- SIUs / CIUs will enter sample results through the Linko Exchange Portal
- Report materials will be uploaded as Attachments
- Reports will be compiled and submitted to WSSC Water
- Electronically sign reports\*





# Will wet signatures still be required?

- FOR NOW - the answer is YES
- Why?
  - CROMERR (Cross-Media Electronic Reporting Regulation) approval needed from EPA
  - Linko Exchange
    - Registration
    - Training
- There still may be some instances when a wet signature is needed on occasion



**Report:** SMR Monthly

**Period:** August 01, 2022 - August 31, 2022

**Industry Name:** LE-TRAIN-WSSC-01

**Submitted Date:** August 30 2022 08:21 AM

**Industry Number:** LE-TRAIN-01

**Submitted By:** Peter Holland

**Address:** 1999 BROADWAY,  
DENVER, Colorado 80202

**Title:** Supervisor

## Samples and Results

Monitoring Point: 001										
Month	Parameter	Result	MDL	Sample Start	Sample End	Collection Method	Lab Sample ID	Analysis Method	Analysis Date	Flow
August	Cadmium	0.17 mg/l		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Cadmium	0.014 ppd		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Chromium	2.5 mg/l		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Chromium	0.209 ppd		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Dissolved Aluminum	1 mg/l		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Dissolved Aluminum	0.083 ppd		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Lead	0.69 mg/l		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd
	Lead	0.058 ppd		08/01/2022 06:00 AM	08/01/2022 10:00 PM	Comp	12345-080122-001			10000 gpd

## Comments

some sort of report comment

## Attachments



These files are also part of the Copy Of Record.

Original File Name	System Generated Unique File Name	Attachment Type
20171009_LabAnalyticalResults.docx	20171009_LabAnalyticalResults_25723.docx	Lab Analytical / COC / QA/QC

### Authorized Representative Certification

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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering 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 fines and imprisonment for a knowing violation.

**Please Sign & Return**  
  
 \_\_\_\_\_      \_\_\_\_\_  
 Signature                      Date





# Who will be able to electronically sign reports in Linko Exchange?

## NO CHANGES

- Authorized Representatives
- Delegated Authorized Representatives





### Signatory Authority



#### Designation of Authorized Representative<sup>1</sup> (Required)

I, \_\_\_\_\_ of \_\_\_\_\_  
Authorized Representative Authorized Representative Title

\_\_\_\_\_, as an individual identified in 40 CFR Part 403.12(l)(1)&(2)  
Industry Name

of the Federal Pretreatment Regulations, shall sign all reports submitted to the Washington Suburban Sanitary Commission (WSSC) for purposes of maintaining compliance with Federal and local pretreatment requirements. In the event that I choose to delegate signatory authority to another authorized representative, I shall notify WSSC, in writing, of the change.

\_\_\_\_\_  
Signature of Authorized Representative Date  
\_\_\_\_\_  
Authorized Representative E-mail Authorized Representative Phone Number

#### Delegation of Signatory Authority (Optional)

I, \_\_\_\_\_ of \_\_\_\_\_,  
Authorized Representative Industry Name

duly authorize \_\_\_\_\_,  
Delegated Individual Delegated Individual Title

to sign all reports submitted to the Washington Suburban Sanitary Commission (WSSC) for purposes of maintaining compliance with Federal and local pretreatment requirements. In the event that the name of the aforementioned designated individual changes, a new statement shall be submitted to WSSC, in writing, thus granting authorization to the new individual.

\_\_\_\_\_  
Signature of Delegated Individual Date Signature of Authorized Representative Date  
\_\_\_\_\_  
Delegated Individual E-mail Delegated Individual Phone Number

<sup>1</sup> Authorized Representative Definition (in following 40 CFR Part 403.12(l)(1) & (2):  
1. By a responsible corporate officer if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:  
1. The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or  
2. The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations, can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.  
2. By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship, respectively.  
3. By a principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agent.  
4. By a duly authorized representative of the individual designated in paragraph a., b., or c. of this Section if:  
1. The authorization is made in writing by the individual described in paragraph a., b., or c.;  
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and  
3. The written authorization is submitted to the Washington Suburban Sanitary Commission (WSSC).  
If authorization in paragraph a-d. above is no longer accurate because a different individual or position has responsibility, a new written authorization must be submitted to the WSSC prior to or together with any reports to be signed by an authorized representative.





# What Happens if an SIU/CIU has a change in the Authorized Representative?




- New Form(s) need to be submitted
- Paper reports submitted



# When will access to the software be available?

Registration Pending for LE-TRAIN-EBERLE (WASHINGTON SUBURBAN SANITARY COMMISSION)

 noreply-acp@aquaticinformatics.net  
To  Eberle, Marianna L

 Reply
  Reply All
  Forward
  ...

Fri 3/17/2023 11:25 AM

**EXTERNAL EMAIL!**

Hello,  
 The following user has registered at Aquatic Compliance Platform and requires action:  
 Registrant: Alex DeWire Authority: WASHINGTON SUBURBAN SANITARY COMMISSION Facility: LE-TRAIN-EBERLE 14501  
 Sweitzer Lane Laurel,  
 This email was sent  
 from an unmonitored account. Do not reply to this email because it will not be received. If you have questions  
 or concerns, please contact Rindge, Philip at [Philip.Rindge@wsscwater.com](mailto:Philip.Rindge@wsscwater.com) or 301.206.8594.

**CAUTION** This email originated from outside WSSC Water. Do not click links or open attachments unless you recognize the sender and know the content is safe.

- Starting in 2023
- SIU/CIU will receive an email invite
  - Create an account
    - Request has to be accepted
- Training



# Who will have access to the software and training at the SIU/CIU?

- Authorized Representative (AR)\*
- Designated Authorized Representative \*
- Other SIU/CIU Contacts (with no signatory authority)

***\*NOTE – ONLY ARs and Designated ARs will have signatory ability***





# Signatory Reminder

If YOU Are An Authorized Representative  
Or  
A Delegated Authorized Representative

**DO NOT SHARE YOUR LOGIN CREDENTIALS**



# During/After Training – What Happens?

- Practice – Practice – Practice
- Become comfortable in the software
- SIU/CIU will be “LIVE” in the software



# Linko Exchange Data Entry

- Data can be entered manually each time
- Data may be loaded into an Excel spreadsheet and uploaded
- Data can be copied and modified

Industry Dashboard - Aquatic Informatics

https://service-acp-beta-le.aquaticinformatics.net/industry/87176023-8267-4682-BECF-F45B5A5F4DE3/dash:...

**AQUATIC Informatics**

**Dashboard**

**Report Packages**

- 4 Scheduled Report Packages are Late or Due within 5 days
- 2 Draft Report Packages
- 3 Ready To Submit Report Packages
- 1 Pending Acceptance Report Packages
- 0 Rejected Report Packages

**Samples**

- 1 Draft Samples
- 2 Ready To Report Samples

**SAMPLES**

- Draft 1
- Ready To Report 2
- Reported

**REPORT PACKAGES**

- Scheduled 4
- Draft 2
- Ready To Submit 3
- Pending Acceptance 1
- Rejected
- Accepted
- Repudiated

**INDUSTRY ACCOUNT**

- Users
- Settings
- Data Providers
- Pending Registrations
- Permit Limits

## Steps: The Dashboard

The **Dashboard** shows Sample and Report Package work Status

Samples have **Draft**, **Ready to Report** and **Reported** statuses

Reports have **Scheduled**, **Draft**, **Ready to Submit**, **Pending Acceptance**, **Rejected**, **Accepted** and **Repudiated**

The numbers in the colored **Action Badges** represent total for that **Status**

Clicking the links to the right of the **Dashboard Action Badges** will take you to the corresponding left navigation

Click the **Ready To Submit Report Packages** link to view reports in that **Status**

Congrats! You've completed **The Dashboard**

- Dashboard
  - Samples
    - Draft
    - Ready to report 1
    - Reported
  - Attachments
  - Report packages
    - Scheduled 1
    - Draft
    - Ready to submit 1
    - Pending acceptance
    - Rejected
    - Accepted
    - Repudiated
  - Industry account
    - Users**
    - Settings
    - Data providers
    - Permit limits
  - Pending registrations
- 
- LE-TRAIN-EBERLE, 14501 Sweitzer Lane

## LE-TRAIN-EBERLE Users

Users -

Refresh

First name <span style="font-size: small;">↑ 1</span>	Last name <span style="font-size: small;">↑ 2</span>	Phone number	Email	Registration date	Status	Account locked
<a href="#">Alex</a>	DeWire	240-917-4994	alex.dewire@wsscwater.com	Mar 17, 2023	Active	No
<a href="#">Marianna</a>	Eberle	301-206-8595	marianna.eberle@wsscwater.com	Nov 15, 2022	Active	No

1 - 2 of 2 items

Pending invitations Invite -

Refresh

First name	Last name	Email	Date invited	Invitation expires
No records available				



**Report:** Permit Limits

**Industry Name:** LE-TRAIN-EBERLE

**Industry Number:** LE-TRAIN-03

**Address:** 14501 Sweitzer Lane,  
Laurel, 20707

**Authority:** WASHINGTON SUBURBAN  
SANITARY COMMISSION

Monitoring Point: 001									
Parameter	Effective Date	Expiration Date	Concentration Daily Limit	Concentration Average Limit	Concentration Units	Average Type*	Mass Daily Limit	Mass Average Limit	Mass Units
Arsenic	01/01/2023	03/22/2024	0.2	--	mg/l		--	--	
Cadmium	01/01/2023	03/22/2024	0.1	--	mg/l		--	--	
Copper	01/01/2023	03/22/2024	2.3	--	mg/l		--	--	
Cyanide	01/01/2023	03/22/2024	0.31	--	mg/l		--	--	
Fats, Oil and Grease	01/01/2023	03/22/2024	200	--	mg/l		--	--	
Lead	01/01/2023	03/22/2024	1	--	mg/l		--	--	
Mercury	01/01/2023	03/22/2024	0.035	--	mg/l		--	--	
Molybdenum	01/01/2023	03/22/2024	0.19	--	mg/l		--	--	
Nickel	01/01/2023	03/22/2024	3.4	--	mg/l		--	--	
Oil & Grease (Nonpolar, Petroleum)	01/01/2023	03/22/2024	100	--	mg/l		--	--	
PCBs	01/01/2023	03/22/2024	0.001	--	mg/l		--	--	
Selenium	01/01/2023	03/22/2024	0.25	--	mg/l		--	--	
Silver	01/01/2023	03/22/2024	1.2	--	mg/l		--	--	
Tetrachloroethylene	01/01/2023	03/22/2024	0.0945	--	mg/l		--	--	
Trichloroethylene	01/01/2023	03/22/2024	0.026	--	mg/l		--	--	
Zinc	01/01/2023	03/22/2024	3.4	--	mg/l		--	--	
pH maximum	01/01/2023	03/22/2024	6-10	--	s.u.		--	--	
pH minimum	01/01/2023	03/22/2024	6-10	--	s.u.		--	--	

-- No Limit defined

\* F = Four Day, M = Monthly

Dashboard

Samples

Draft

Ready to report

Reported

1

Attachments

Report packages

Scheduled

Draft

Ready to submit

Pending acceptance

Rejected

Accepted

Repudiated

1

1

Industry account

Users

Settings

Data providers

Permit limits

Pending registrations

## Report packages - scheduled

Refresh

Name	Period start date	Period end date	Due date ↑	Status	
SMR Quarterly - Standard	Oct 1, 2022	Dec 31, 2022	Jan 7, 2023 ⚠	Ready To Submit	<a href="#">View</a>
SMR Quarterly - Standard	Jan 1, 2023	Mar 31, 2023	Apr 7, 2023	Scheduled	<a href="#">Create Draft</a>

⏪ ⏩ 1 ⏪ ⏩

1 - 2 of 2 items

- Dashboard
- Samples
  - Draft
  - Ready to report 1
  - Reported
- Attachments
- Report packages
  - Scheduled 1
  - Draft
  - Ready to submit 1
  - Pending acceptance
  - Rejected
  - Accepted
  - Repudiated
- Industry account
  - Users
  - Settings
  - Data providers
  - Permit limits
- Pending registrations

## Report package details

Ready To Submit

### Report

Name	Report period
SMR Quarterly - Standard	Oct 1, 2022 - Dec 31, 2022
Industry	Industry number
LE-TRAIN-EBERLE	LE-TRAIN-03

### Samples and results

		Monitoring point <span style="font-size: small;">↑ 1</span>	Name	Collection method <span style="font-size: small;">↑ 2</span>	Start date <span style="font-size: small;">↑ 3</span>	End date	Lab sample ID	Created/Modified date
+	✓	001	Self	Comp	Nov 10, 2022	Nov 10, 2022	20131130-001	Mar 17, 2023 3:07 PM

⏪ < 1 > ⏩
1 - 1 of 1 items

Lab Analytical / COC / QA/QC

Rejected  
Accepted  
Repudiated

Industry account

Users  
Settings  
Data providers  
Permit limits

Pending registrations

## Samples and results

Monitoring point	Name	Collection method	Start date	End date	Lab sample ID	Created/Modified date
001	Self	Comp	Nov 10, 2022	Nov 10, 2022	20131130-001	Mar 17, 2023 3:07 PM

Parameter name	Result	Mass loading result	Analysis method	MDL	Analysis date and time
Arsenic	1.2 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Cadmium	0.4 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Copper	0.1 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Lead	0.223 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Molybdenum	0.124 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Nickel	0.005 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Selenium	< 0.001 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Silver	< 0.003 mg/l	●	EPA 200.8	0.005	Mar 17, 2023
Zinc	< 0.003 mg/l	●	EPA 200.8	0.005	Mar 17, 2023



### Lab Analytical / COC / QA/QC

Name ↑	Original file name	Description	Uploaded by	Upload date	Last submitted
<a href="#">ANALYTICAL LAB REPORT WITH SAMPLE DATA_33744.pdf</a>	ANALYTICAL LAB REPORT WITH SAMPLE DATA.pdf	Example Attachment	Alex DeWire	Mar 17, 2023 3:06 PM	

« ‹ 1 › »

1 - 1 of 1 items

### IMPORT SPREADSHEET

Name ↑	Original file name	Description	Uploaded by	Upload date	Last submitted
No records available					

« ‹ › »

0 - 0 of 0 items

### Authorized Representative Certification

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.



Comments

Review summary

Report content review

3 of 3 required report elements are present

	Report element	Required	Present in report	
1	Samples and Results	Yes	Yes	✓
2	Lab Analytical / COC / QA/QC	Yes	Yes	✓
3	IMPORT SPREADSHEET	No	No	
4	Authorized Representative Certification	Yes	Yes	✓

Sample result compliance summary

9 of 9 sample results are in compliance

\* Please see the samples and results section to view each parameter.

Sign and submit report

\* Enter your password

\* What is your favorite pet's name?

Sign and submit

## ***What happens if:***

- an attachment is not submitted?***
- there is a data entry error?***

- Report will be rejected
- Report will be sent back to SIU/CIU
- SIU/CIU will make corrections, compile and resubmit



**In the event that the report is rejected and/or refiled after the report due date –**

***Will the SIU/CIU be in violation?***

**POTENTIALLY**



# Will all SIUs/CIUs Use Linko Exchange?

- Evolving Process
- Eventually - YES



# Suggestions for Successful Transition to Linko Exchange?

- Consider having at least one Designated Authorized Representative for your industry
- Review sampling results, as received
- Consider entering data as it is received for specific sampling dates
- Data missing, contact your lab to ensure you have all paperwork prior to data entry and submission



# Suggestions for Successful Transition to Linko Exchange?

- Recheck your data entry
- Recheck all attachments are included
- Verify that the report has been submitted
- Do Not Wait Until the Last Day to Submit Report
- Do Not Share Login Credentials



Questions?