

## San Jose/Santa Clara Water Pollution Control Plant

# Local Limits and Sewer User Ordinance Revisions Industrial Stakeholder Workshop

August 20, 2007

## Questions and Answers

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### 1. How are current permits affected by local ordinance changes?

It is the City's intent that the current permits will be amended by letter once the ordinance changes and new Local Limits are adopted by each jurisdiction.

### 2. Why is the new Nickel limit proposed at 0.5 mg/L only? Is EPA driving limit down?

The City calculated the Nickel Limit using the 2004 EPA Local Limits Guidance Manual. The nickel limit calculation used the San Jose/Santa Clara Water Pollution Control Plant's (Plant) monthly average permit limit of 25 microgram per liter (ug/l) and calculated a maximum allowable headworks loading based on the third decile removal rate for nickel and a safety factor. After calculating the maximum allowable headworks loading the maximum allowable industrial loading was also calculated using residential and commercial sector loading data. The maximum allowable industrial loading was calculated to a local limit of 0.5 mg/l

### 3. What is Plant's limit for Ni?

We have posted all the pollutant limits for the Plant at [www.sanjoseca.gov/esd/wastewater/PollutantLimits.asp](http://www.sanjoseca.gov/esd/wastewater/PollutantLimits.asp). The Plant treats and discharges an average of 110 million gallons per day of treated wastewater and is subject to the following Nickel limits per our NPDES permit:

- a. The Plant's daily maximum limit is 34 µg/L for Nickel. \*\*
- b. The Plant's monthly average limit is 25 µg/L for Nickel. \*\*

*\*\* (a) All analyses shall be performed using current USEPA methods, or equivalent methods approved in writing by the Executive Officer.*

*\*\* (b) Limitations apply to the average concentration of all samples collected during the averaging period (Daily = 24-hour period; Monthly = calendar month).*

*\*\* A daily maximum or monthly average value for a given constituent shall be considered non-compliant with the effluent limitations only if it exceeds the effluent limitation and the reported ML for that constituent.*

**4. I have a permit that runs through 2011. When will my permit be revised?**

It is the City's intent that all permits will be revised to reflect the new requirements as the ordinance changes are adopted by each jurisdiction by letter. Additionally, the City will be reissuing permits for all Significant Industrial Users in response to the EPA Administrative Order by June 30, 2009. If your company is an SIU, your permit will be reissued under that schedule and will reflect all the changes in effect at the time. If you are not an SIU, your permit will be updated according to your regular renewal reschedule.

**5. If the proposed Local Limit is listed a "none," does that mean non-quantifiable? Does that mean you will not regulate for those anymore?**

If the proposed Local Limit is listed as "none" this means that the City has proposed that there is no Local Limit for that particular pollutant. However, the pollutant in question may be subject to other State or Federal regulations with which you will have to comply.

**6. Will there still be TTO limits?**

TTO sampling will occur and will be required to address Federal and State regulations.

**7. Since you are eliminating the Local Limit for TTO, does that mean you will no longer sample for TTO?**

Sampling will be required and conducted at those facilities where the Federal TTO limits are applicable.

**8. Why is the Plant inefficient at removing Ni? Why is it allowed to pass-through?**

Wastewater treatment plants are typically designed to treat domestic sewage that is high in organic matter. Most of the flow to these plants comes from domestic sources. They are not designed to remove any metals. Although the Plant has advanced tertiary treatment, it is not economically feasible for the plant to treat for dissolved metals at a plant the size of our Plant. Currently the Plant does capture some particulate metals, however, if too many metals go to the sludge fraction, the ability for reuse of the sludge is compromised as well. Therefore, it is more practical for the Plant to require source control for metals by industrial users.

**9. Why is the Plant not capable of treating metals such as Zinc?**

See answer for question 8.

**10. Do you have any changes in pH requirement?**

Currently, there are no recommended changes to the pH requirements.

**11. My permit expires October 2007, when will my new permit be issued? Will it include these new limits and changes (I'm a paperboard manufacturer, located in Santa Clara.)**

Our target is to get all permits out within 90 days of expiration. For businesses located in the geographic areas tributary to the Plant, the adoption of the new SUO will not occur until early 2008, so your Permit will likely contain the current limits and be amended by letter when the new Sewer Use Ordinance take effect for the City of Santa Clara.

**12. Will proposed changes to ordinance be available to IUs?**

The proposed changes to the actual Sewer Use Ordinance language will be made available online with the release report to the San Jose City Council in September/October. We will notify all workshop attendees when this information is available.

**13. What are the Plant's limits? Can these be posted online?**

We have posted all the pollutant limits for the Plant on the internet; see [www.sanjoseca.gov/esd/wastewater/PollutantLimits.asp](http://www.sanjoseca.gov/esd/wastewater/PollutantLimits.asp)

**14. When will notification letters go out?**

The City intends to send notification letters as soon as the recommended changes are adopted by the respective jurisdictions. Target dates are as follows:

San Jose	November 30, 2007
Other jurisdictions	February 29, 2008

**15. Will you be requiring all sample points to be designed to 5-gallon capacity?**

The sample point must meet the requirements set forth in the discharge permit. The 5-gallon capacity discussed during the presentation was an example.

**16. Once the SUO goes into effect, do we need to apply for new permit or will WPC amend/issue permit?**

It is the City's intent that the current permits will be amended by letter once the ordinance changes and new Local Limits are adopted by each jurisdiction. Industrial users will not have to submit a new permit application unless your permit is up for renewal. As the City is reviewing and reissuing permits per EPA direction, we may be requesting additional information to complete the review.

**17. Can pH data recorder with chart paper be replaced with an electronic monitoring system that will track the data on a PC and make it available electronically?**

This type of request must to be submitted in writing and discussed with your Source Control Inspector and must be approved by your inspector prior to installation.

**18. Do we (IUs) need approval from POTW to remove chart recorder?**

Currently, the requirement for a chart recorder is a permit requirement. In order to remove this equipment, a written request must be submitted and approved by your Source Control inspector prior to removal. Contact the inspector assigned to your facility to coordinate this.

**19. I currently get numerous letters from the City. Can the notice of new SUO effective dates be sent certified mail, so we place importance to this correspondence?**

The City will look into sending out these notifications via certified mail. Additionally, the information will also be communicated to you by your Source Control Inspector, in articles in the Tributary Tribune newsletter and on the City's web site.

**20. The 1,000 gpd referred to in Local Limits presentation, is this average or peak?**

The 1,000 gpd referred to in the Local Limits presentation refers to average flow.

**21. How much Nickel is attributed to each sector? (residential, commercial, industrial)**

Based on a study conducted last year, the estimated contribution of Nickel by sector is as follows:

Commercial	52%
Residential	26%
Industrial	15%
Unknown	7%

The City's calculated local limit was derived by using a contribution of 10.6 pounds per day (ppd) of nickel from the residential and commercial sectors and 2.4 ppd of nickel from the industrial sector.

**22. Can you clarify the "none" for manganese, TTOs, and xylene. How does this fit in with the detection limits?**

"None" means that there is no numeric local limit associated with these pollutants. However, State and Federal limits do apply and will be enforced.

**23. What does it mean by Ni is pass through at Plant?**

Elemental Nickel that enters the treatment plant will either be removed in the sludge fraction, or will be discharged to the bay. In the case of dissolved Nickel, most of it passes through the treatment plant and will be discharged to the bay. For additional information please see answer to Question 8.

**24. What is the effective date for the new limits? (When we get the letter or when permit is amended?)**

We are targeting adoption by October 30, 2007 for San Jose and February 29, 2008 for all other jurisdictions. The City will be sending letters officially amending your permits to reflect the new Local Limits once the Sewer Use Ordinance revisions have been adopted by each jurisdiction. This notification letter will specify the actual effective date of the new limits.