

# Self Monitoring Report (SMR) Fact Sheet

## Things To Remember

- Report ALL violations within 24 hours of discovery.
- Use a State certified laboratory for all required analysis.
- Fill out your SMR Form completely and sign it.
- Submit your SMR Form, with all required documents, even if no wastewater was discharged in the reporting period.
- Complete one SMR Form for each sample point and for each sample event.
- Incomplete SMR Forms, untimely submittal of SMR Forms, or failure to report violations within 24 hours of discovery can lead to severe legal and monetary penalties.

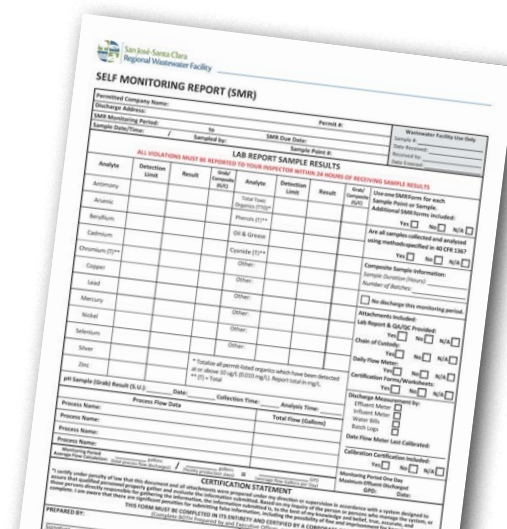
## The City of San José Pretreatment Program is responsible for:

- Protecting the South San Francisco Bay from “pass-through” of toxic chemicals, heavy metals, and other pollutants of concern
- Protecting the health and safety of citizens
- Protecting operations at the San José-Santa Clara Regional Wastewater Facility, the sanitary sewer collection system, and workers
- Ensuring compliance with state and federal pretreatment regulations

An Industrial User’s (IU) Self Monitoring Report (SMR) is one of the methods used to accomplish the above objectives.

## Why Self Monitoring?

Federal pretreatment regulations require IUs to conduct periodic self monitoring of the flow, nature, and concentration of pollutants in their effluent. Specifically, 40 CFR 403.12: Reporting Requirements for Publicly Owned Treatment Works (POTW) and Industrial Users, part (e) (1) states:



You can download a copy of the SMR Form at [www.sanjoseca.gov/pretreatmentforms](http://www.sanjoseca.gov/pretreatmentforms)

*“Any Industrial User subject to a categorical Pretreatment Standard...shall submit to the Control Authority...a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards.”*

As a permitted IU, you have a responsibility to submit a periodic SMR. Your SMR requirements are described in sections B and C of your Industrial Wastewater Discharge Permit (Permit). Your SMR allows us to determine your compliance with discharge limits and with other local, state, and federal compliance standards.

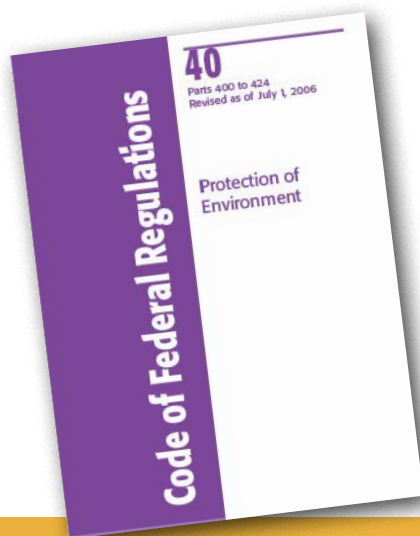


San José-Santa Clara Regional Wastewater Facility



Environmental Services

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### Preventing SMR Violations

- **Read your Permit**, understand your self monitoring requirements, and talk to your Inspector to clarify uncertainties.
- **Mark your calendar** well in advance of your SMR due date and keep blank SMR forms handy.
- **Schedule collection of samples well in advance** of the SMR due date so a laboratory delay won't cause you to be in violation for late submittal.
- **Sample during the period specified in your permit.** For example, if your semi-annual SMR is due on 6/30/15, then your sample must have been taken between 12/1/14 and 5/31/15.
- **Be sure to document** the date and time of sample collection; if you have an outside contractor collect your samples, be sure the activity is logged.
- **Sample and analyze correctly** for all required constituents as specified in your Permit. Permit requirements specify the pollutants to be analyzed and the methods of sample collection. Ensure your laboratory uses analytical methods approved by the US EPA for wastewater analysis, NOT hazardous or solid waste analysis.
- **Submit your SMR on time** – SMRs are due in our office on or before the last day of the months listed in Section B.1 of your Permit.
- **Submit your SMR even if no wastewater is generated during the reporting period** with all required documentation, as listed in your Permit.

- **Complete one SMR for each sample point and each sample event** if you have multiple sample points or sample collection events.
- **Ensure that your SMR is complete** and includes all attachments. If anything is missing, attach an explanation stating why and when it will be submitted, and send the missing information promptly.
- **Ensure that your SMR has both required signatures.** SMRs must be signed by *both* the person who prepared the SMR and the corporate officer who certified the legitimacy of the SMR data, even if they are the same person.
- **Regularly maintain all self monitoring equipment and documentation**, as this is a condition of your Permit and demonstrates your level of effort to prevent violations.
- **Respond immediately to violations** by implementing and documenting corrective actions.
- **Most importantly, report ALL violations within 24 hours.** Review all laboratory results upon receipt and report ALL violations to your Inspector, regardless of whether the monitoring was carried out for SMR reporting purposes, or for another purpose.

### Consequences of SMR Violations

SMR violations, including discharge violations, incomplete SMRs, untimely submittal of SMRs, or failure to report violations within 24 hours of discovery, can trigger the following consequences:

Legal, administrative, and punitive consequences for your business ranging from verbal warning to monetary fines

Requirements for changes or additional procedures, equipment, sampling, record keeping, etc.

Referral to the City Attorney's or the District Attorney's Office for prosecution

Your business name published in the newspaper as being in "Significant Noncompliance" under Federal mandate 40 CFR 403.8(f)(2)(viii)



*In accordance with the Americans with Disabilities Act, City of San José Environmental Services Department materials can be made available upon request in alternative formats, such as Braille, large print, audio-tape, or computer disk. Requests may be made by calling (408) 535-8550 (Voice) or (800) 735-2929 (California Relay Service).*

## Avoid Self Monitoring Violations from Equipment Failure

Self monitoring equipment may include, but is not limited to, flow meters, pH meters, and automatic samplers.

- Conduct regular maintenance of monitoring equipment
- Document repairs, periodic maintenance, and equipment replacement
- Keep spare replacement and repair parts on hand
- Set up a redundant sampling system

## Attachments

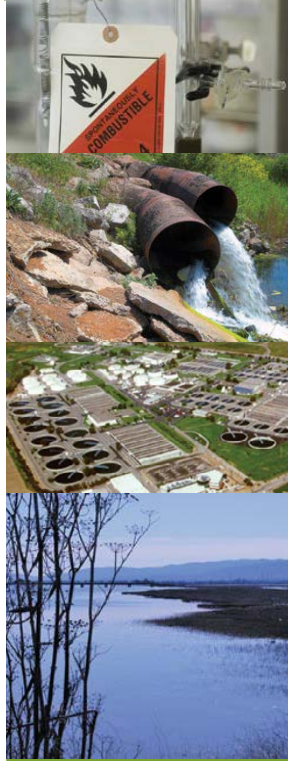
Include all necessary form attachments with your SMR Form as required in Sections B and C of your Permit; these attachments could include:

- Laboratory results
- Chain of custody
- Additional sampling results, if required
- Quality Assurance/Quality Control (QA/QC) documentation
- Supporting flow documents such as treatment log books, water bills, or flow meter reading logs
- TTO Certification Forms, if required
- Flow meter calibration certification, if required
- Waste manifests for the reporting period, if required
- Production data, if required

The San José-Santa Clara Regional Wastewater Facility (Wastewater Facility) serves the cities of San José, Santa Clara, Milpitas, Cupertino Sanitary District, West Valley Sanitation District (including Campbell, Los Gatos, Monte Sereno, and Saratoga), County Sanitation Districts 2- 3, and Burbank Sanitary District.

## Environmental Effects of Discharge Violations

SMR violations, including discharge violations, incomplete SMRs, untimely submittal of SMRs, or failure to report violations within 24 hours of discovery, can trigger the following consequences:

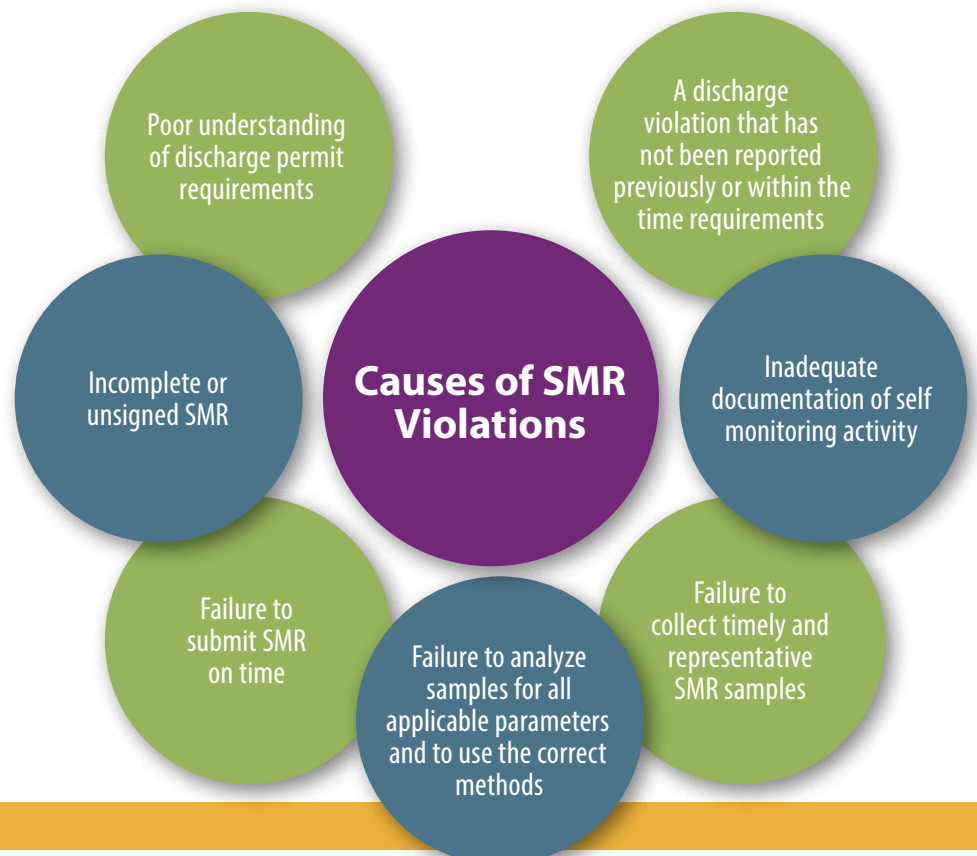


Hazardous substances can endanger workers by releasing toxic fumes, generating explosive conditions in the sewer system, and causing chemical burns.

Acidic discharges can result in sewer line failure, pump station failure, collection interceptor breakdown, disruption of service, and uncontrolled releases of wastewater generating toxic conditions.

Pollutants of concern in the wastewater can disrupt Wastewater Facility operations and sludge processes. This is called "interference."

Pollutants can disrupt the Wastewater Facility's treatment processes, causing the Wastewater Facility to be in violation of its National Pollutant Discharge Elimination System (NPDES) effluent discharge limits, and releasing toxic wastewater into the South San Francisco Bay. This is called "pass through."



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Directions for each lettered section on the SMR form are itemized below.

## Top section:

- A** Fill in the full legal Company Name, Permit Number, and Discharge Address.
- B** Enter the SMR Reporting Period start and end dates and the SMR Due Date. **Remember to fill out a SEPARATE SMR FORM for each sample point and sample event.**
- C** Enter the Sampling Date and Time. For a composite sample spanning two calendar days, use the end date as the Sampling Date. Enter the name of the person collecting the sample.
- D** Enter the Sample Point Description identifying where the sample was collected. **Remember to fill out a SEPARATE SMR FORM for each sample point and sample event.**

## Analytical Results section:

- E** Enter all analytical data in milligrams per liter (mg/L). If your laboratory provided results in micrograms per liter (µg/L), convert the results to mg/L by dividing the result by 1000 (e.g., 10 µg/L /1000 = 0.010 mg/L).
- F** Fill in the Detection Limit data for each Parameter analyzed. The Detection Limit can be found in the analytical report provided by your laboratory and may be listed as Method Detection Limit (MDL) (preferred) or Detection Limit (DL) or Practical Quantification Limit (PQL).
- G** Fill in the Result data for each Parameter analyzed. This is the actual concentration of the Parameter analyzed. If the Parameter was not detected, enter the value as "less than the Detection Limit" (e.g., < 0.010 if the Detection Limit is 0.010); do not enter "ND" or "N/A".
- H** For each Parameter analyzed, indicate whether the sample was a Grab (G) or Composite (C) Sample.
- I** When reporting Total Toxic Organic (TTO) data, remember to totalize all TTO results greater than 10 µg/L (0.010 mg/L).
- J** Indicate whether samples were analyzed using US EPA methods for industrial wastewater found in 40 CFR 136.
- K** Indicate whether additional SMR Forms are included. **Remember to fill out one SMR Form for each sample date and/or each sample point.**
- L** Indicate which attachments are enclosed with your SMR Form.
- M** If no discharge occurred during the monitoring period, check this box.
- N** Indicate how you are determining your flow for the reporting period. Enter the date of your last Flow Meter Calibration.
- O** Provide Sample Information for each Composite (C) Sample indicated in section H. If your sample was collected as a composite of multiple samples from a continuous or intermittent discharge, provide the sample duration in hours. If the sample was collected from one or more treated batch discharge(s), indicate how many hours or days the discharge(s) represent. Remember that if multiple batches are discharged on the sample day, the sample must represent all batches discharged.
- P** For each process, indicate average and maximum flow rates in gallons per day (gpd). Average daily flow is the discharge over a period divided by

the number of days the facility is in production during that period (i.e., any day when an employee is on site conducting business and/or the business is treating and discharging wastewater from a process.) Attach additional sheets if necessary.

**Example:** Industry A discharged 20,000 gallons from 12/1/14 to 5/31/15 and was in production 125/182 days in the period. The flow would be 20,000 gallons/125 days. Average daily flow of 160 gpd would be reported in the 6/30/15 SMR.

## Certification Statement section:

- Q** Ensure that your SMR Form is signed by both the person who prepared the SMR and the corporate officer who is certifying legitimacy of the SMR data, even if they are the same person.

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