

TRIBUTARY TRIBUNE

The Unannounced Inspection

Have you ever been paged in the middle of a meeting to find that an ESD inspector is waiting to collect a sample or perform an inspection? Have you ever had a problem collecting a split sample because you did not have the proper containers? The purpose of this article is to illustrate the importance of being prepared and to provide a few tips so future inspections are more efficient for everyone.

It is a USEPA requirement that unannounced inspections be performed. Unannounced inspections are one of the most effective tools in monitoring compliance. But it is a problem if an inspector has difficulty gaining access because the designated contact can't be found. In other cases, the inspector is unable to access the facility because the building is locked during business hours.

Guidelines instruct the inspector to wait a short time before regarding such a situation as an access problem. The inspector will work with the IU to resolve communication and other problems making access to the facility difficult. However, repeated access problems will result in a citation and/or fine.

The following are suggestions to prepare for the unannounced inspection:

Update Contacts

Have at least **three** contacts familiar with the production area, wastewater treatment area, log-books and sample point. If you have employees traveling between multiple buildings, frequently attending meetings, or otherwise involved in tasks that make it difficult to quickly respond, consider using more contacts.

Keep your inspector, receptionist, and facility security informed of changes in personnel and provide updated contact numbers (office phone, cell phone and pager). If you are a small business, consider training your receptionist to escort the inspector. The contact does not need to answer every question asked on the spot; they just need to be familiar with the areas the inspector must access.

If appropriate, consider allowing our inspectors to access the facility without an escort. Although we ask for a contact's signature to document our sample collection, the signature is not required for valid sample results.

Prepare for Sampling

IUs can collect split wastewater samples at the time a composite sample is collected, as well as replicate samples at the time a grab sample is collected. IUs must provide their own bottles. Your laboratory should be able to supply the proper sample containers and advise you on how to preserve the sample. Remember that different types of analyses require different bottles and are preserved differently; you are responsible for having what you need when we arrive.

If requested, ESD personnel will help you preserve, label and put security tape on your split or replicate sample, provided we can do so without interfering with our job duties.

Maintain Sampler

If your company is required to have your own composite sampler, you must keep up with the routine maintenance of the sampler. Hoses frequently split. Over time, moisture can build up inside the sampler and damage the control box. Check the moisture indicator on the sampler. By changing the

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desiccant inside the control box, you can prevent damage. Consult your owner's manual for other issues.

Occasionally errors are made in programming the sampler. When programming the sampler, please check that the correct volume of wastewater is collected at the correct time intervals.

If your permit requires that composite samples be kept at 4°C, verify that your sampler stays at 4°C until an inspector arrives.

Keep Sample Point Accessible

Keep safety in mind. Some sample points are cluttered with other equipment, and are located in locations difficult to access. We must be able to reach the wastewater to collect a grab sample. Similarly, we must be able to inspect all areas of the facility relevant to wastewater production and discharge.

To avoid the potential of collecting a sample in the wrong location, make sure the sample point is properly and clearly labeled. Your inspector can provide labels.

Document Unusual Events

If you have been in recirculation and have had no in-house tests logged—**document it.** If we see what appears to be a discharge or permit violation, documentation made prior to the inspec-

tion can be crucial in exonerating your business or mitigating our enforcement response by establishing that you are already trying to correct the problem.

If your sample point experiences a build up of solids over time, and you periodically clean it out, you must document each cleaning in an appropriate logbook. Your permit requires that the sample point's design keeps some wastewater from the last

discharge.

Use of escorts to observe all aspects of inspection and sampling is your right, but it should not interfere with inspectors performing their duties. The intent is to perform an inspection and collect a representative sample in an efficient manner.

We appreciate a responsive and prepared IU. If you have questions, please contact your inspector.

WET Projects Come in All Sizes

Past issues of the Tributary Tribune have described large-scale wastewater reduction projects such as reusing process water in cooling towers and scrubbers and the installation of closed-loop cooling systems. However, **Water Efficient Technologies (WET)** projects come in all sizes, varying in scope, cost, and amount of water saved.

The recent economic slowdown is an excellent opportunity for companies to evaluate their water uses and wastewater

discharges. There is a good chance that your company can implement relatively simple and inexpensive improvements and qualify for a WET rebate.

For example, Micro-Chem (a circuit board manufacturer in Santa Clara) recently completed a project upgrading their cooling system for several pieces of process equipment. They replaced a single pass cooling system with a closed loop process chiller. The new system saves approximately 100

gallons per hour during operation for a total annual wastewater reduction of 208,000 gallons. The new system cost approximately \$10,770 to install, and as a bonus is more energy efficient. Micro-Chem received a rebate of \$1,112, along with the additional benefits of reducing their energy, water and wastewater bills.

Another company filtered their reverse osmosis reject water and recycled deionized (DI) water for reuse in resupplying their bulk DI tank. The project cost approximately \$15,000 and saved 40,451 gallons per day. Their rebate of \$7,500 was well deserved.

Big projects with big savings are always encouraged; however, there are many smaller scale opportunities to save water and receive a WET rebate. Smaller scale projects include: idle flow reduction, automating rinse lines, and flow restrictors.

The criteria for qualifying for a WET project are



straightforward. The project must reduce wastewater flows to the sanitary sewer and be the result of replacing an existing process, not the result of equipment installed for a product change. The minimum water savings required for a WET rebate is 100 cubic feet of water saved per year (or 74,800 gallons per year).

Depending on your operation, this can translate to as low as 200 gallons per day. The rebate is based upon the annual

water savings and is \$4 per hundred cubic feet of water saved per year (748 gallons). The maximum rebate is \$50,000 or 50% of project cost, whichever is less.

The application process has been designed to be simple. A one-page application must be filled out prior to starting the project and a pre-installation inspection must be completed. Commonly, water metering is required to document pre-project and post-project water savings.

Project costs such as equipment and labor invoices need to be provided to document costs. After the post-installation inspection is performed, WET staff determine the water savings, and a rebate check is issued.

To find out how your company can participate in **Water Efficient Technologies**, contact us at (408) 945-3700 or visit our website at:

www.slowtheflow.com



Completing the Total Toxic Organic Forms

Our previous newsletter included an article on filling out your Self-Monitoring Report (SMR) form. This article covers filling out your Total Toxic Organic (TTO) forms properly, as well as related issues.

Applicability

This article applies only to permitted Industrial Users who have TTO reporting requirements. Please examine page 6 of your permit for a mark under the TTO "Testing and Certification Requirements." If that area is not marked by an "x" then there are no requirements. If in doubt, ask your inspector.

Which certification form?

There are two different TTO certifications.

One certification form states, "Based on my inquiry...this facility does not store, use or discharge..." this is the form to submit if you have no TTOs on-site.

The other form states, "Based on my inquiry...no

controlled toxic organics are discharged..." this is the form to use if you store or use TTOs. You must also submit Organic Solvent Worksheets in your SMR submittal to account for TTOs stored, used and disposed of.

Your permit will state which certification form you should submit on page 6, as well as the testing requirements for TTOs, if any. Your TTO permit requirements are based on information submitted at the time the permit was last renewed or amended. If you had no TTOs on-site previously but have some now (or vice versa), promptly inform your inspector in writing to maintain compliance with permit conditions and discharge regulations.

What must I report in the Organic Solvent Worksheet?

(Applicable only if you have TTOs on-site.)

Your inspector can provide you with a list of

the TTOs that apply to your facility if you aren't sure. The TTO list is different for each federal category, and is specific about which chemical compounds must be reported. Submit one worksheet for each TTO used at your facility.

Only chemicals on the TTO list applicable to your facility must be reported. Use of Acetone and Isopropyl alcohol (IPA) never needs to be reported in the worksheets, nor do chemicals with similar structures to listed chemicals even if different by only one atom. You still must report all chemistry usage in permit applications and related documentation, however.

We hope you will find this article helpful. If you have any questions on your TTO requirements please contact your inspector.

TTO QUICK TIPS

- **Do NOT send in both certification forms with your SMR; they contradict each other!**
- **If you must submit an Organic Solvent Worksheet, submit one for each TTO used at your facility.**
- **All signatory requirements for your SMR apply to the TTO certification forms. See pages 11-12 of your permit.**
- **Copies of the TTO forms can be found at: <http://www.ci.san-jose.ca.us/esd/eeforms.htm>**

 Printed on recycled paper.

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) 277-5533 (Voice) or (800) 735-2929 (CRS).

Consequences of Falsified Self Monitoring Reports

On January 19, 2001 and December 6, 2001, the US EPA issued press releases announcing their successful prosecution of a Connecticut chemical manufacturer and two of its former employees for violations of the Clean Water Act.

According to the January 19, 2001 press release, the two former employees, who had been the plant manager and plant engineer, admitted that they were criminally negligent in failing to detect and stop their staff's practice of discarding wastewater tests showing violations of discharge limits.

The failure to report analyses of such samples contributed to the falsification of the corporation's discharge monitoring reports for the site. These discharge monitoring reports are analogous to your required Self-Monitoring Reports (SMRs).

According to the December 6, 2001 press release, the chemical manufacturer pleaded guilty to felony violations of the Clean Water Act. The felony counts were for submitting falsified discharge monitoring reports, the same illegal practices for which the manager and engineer were criminally liable. As part of the



sentencing agreement the corporation will pay \$2 million in criminal fines and \$1 million for "environmental projects."

For more details on these cases refer to the "U.S. EPA Headquarters Press Releases" website, at:

<http://yosemite.epa.gov/opa/admpress.nsf>



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