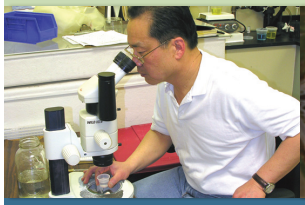
San Jose/
Santa Clara
Water Pollution
Control Plant

Tributary Tribune

www.sanjoseca.gov/esd

Spring 2010




In This Issue:

The **Tributary Tribune** informs the Industrial Users of the Plant's service area, which includes the cities of San José, Santa Clara, Milpitas, Cupertino Sanitary District, West Valley Sanitation District (including Campbell, Los Gatos, Monte Sereno, Saratoga), County Sanitation District No. 2-3, and Burbank Sanitary District.

Tackling TTO Requirements

Certification: It's easier than you think!

Let's say your company manufactures printed circuit boards and your wastewater permit requires you to test for Total Toxic Organics (TTO). Does that mean another load of sample analyses and paperwork added to the burden of satisfying federal regulations? Maybe not.

While many local Industrial Users (IUs) — such as solar panel manufacturers, metal finishers, printed circuit board manufacturers, and semi-conductor facilities — must account for TTO at the worksite, the path to compliance doesn't have to be complicated or time-consuming.

In fact, IUs that don't use or discharge TTO to the sanitary sewer system may be able to opt out of the testing requirement. All that's needed is either a form certifying that there are no TTO on site or one stating that your company has a Solvent Management Plan, with staff training in place, to prevent their discharge. Simply put, if you don't use or discharge TTO, these straightforward forms can save your company the cost of analytical testing, ensure compliance with regulatory requirements, and help protect the San Jose/Santa Clara Water Pollution Control Plant.

You have two paths of action, depending on whether or not toxic organics are used at your site. In both cases, the path starts with accessing the appropriate form from the City of San José's website at ***www.sanjoseca.gov/esd/wastewater/discharger-forms.asp***. Under the heading "TTO Certification Forms For Your Self-Monitoring Report (SMR)," click on the appropriate form, indicating whether or not you have TTO at your facility. **You should only fill out one certification form** — the one most appropriate for your facility.

For IUs with no Total Toxic Organics (TTO)

IUs with no TTO on site should use the "We Don't Have TTO" form to certify that their facility "does not store, use, or discharge to the sanitary sewer system any toxic organic chemicals." It's a good idea to review your Material Safety Data Sheets (MSDS) for the chemicals you have on site and compare them with the list in your permit to verify that you do not, in fact, have any TTO in use. For example, methylene chloride, also called dichloromethane, is a TTO that is commonly found in products like paint removers. If you are unsure about any chemical, just ask your Inspector.

Your steps are simple:

- Fill out the "We Don't Have TTO" certification form.
- Submit it to your Inspector with your SMR.

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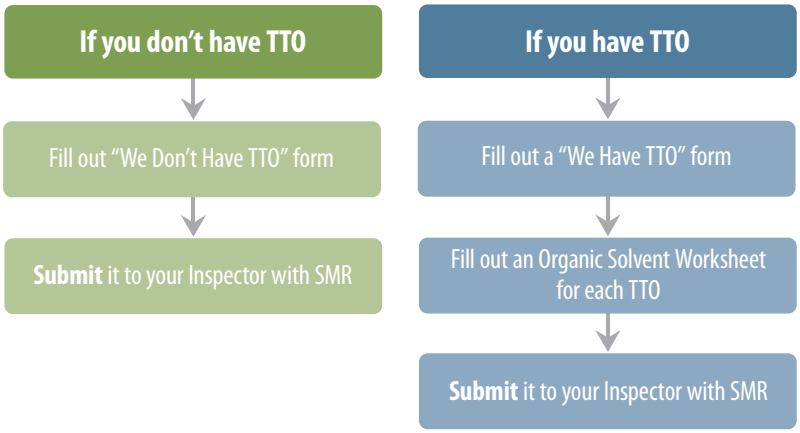
Tackling TTO Requirements

For IUs with Total Toxic Organics (TTO)

IUs that use or have TTO on site should complete the "We Have TTO" form as well as supporting documents:

- Fill out "We Have TTO" certification form.
- Fill out an Organic Solvent Worksheet (available on the City website at ***www.sanjoseca.gov/esd/wastewater/discharger-forms.asp*** for each TTO. The worksheet helps you outline each TTO, its use, and its disposal method.
- Attach all of the above to your Self-Monitoring Report and submit it to your Inspector.

Need help? Your Environmental Inspector is happy to assist if you have any questions about these forms.



To certify or to sample

If you're wondering if your company is eligible to file a certification statement or if federal regulations require you to sample and analyze the TTO at your facility, take a look at your permit.

In your San Jose/Santa Clara Water Pollution Control Plant Industrial Wastewater Discharge Permit, turn to section A.1 – Federal Discharge Conditions. Do you see a "List of Total Toxic Organics" on the following page? If so, your company has sampling requirements that are a condition of your permit; these requirements are outlined in section B.2 – Self-Monitoring Requirements: Interfering Substances. You'll see a sample table below, titled "Total Toxic Organics Testing and Certification Requirements," that spells out what is needed. Boxes marked with an X show permit conditions.

Total Toxic Organics Testing and Certification Requirements *(Sample only)*

X	TTO will be analyzed using EPA method(s) for the compounds identified earlier in the included list(s).
X	In lieu of monitoring for Total Toxic Organics (TTO), you may certify that they are not used or that a Solvent Management Plan is being implemented.
	Submit certification that no Toxic Organic Compounds are being stored, used or generated on site with each Self-Monitoring Report.
X	Submit certification that a Solvent Management Plan is being implemented with each Self-Monitoring Report.

If TTO testing is required

The best way to avoid confusion when sampling, analyzing, or developing solvent management plans for TTO is to become familiar with the list of TTO for your facility. This familiarity will help you understand which analyses will cover all of the constituents noted in your permit.

Your federal category will dictate the testing methodology. If you are testing for TTO, you must use all the test methods needed to cover all of the constituents noted in your permit. For example, the TTO list for semiconductors is captured by 624 and 625 analyses, but metal finishers, including printed circuit board companies, must sample and analyze using method 608, 624, and 625. The table below reflects the required federal testing methods.

TTO Required Test Methods

TTO Category	Applicable EPA Test Method listed in 40 CFR 136 for at least one compound in TTO list[1]
433 Metal Finishing (Existing Captive Shops and New Source)	608/624/625
439A Pharmaceutical Manufacturing	624/ 4500-NH3D/ 524/1667/8015G, 8151A,
469 Electrical and Electronic Components	624/625

[1] Applicable tests are subject to change. Industrial Users should regularly review 40 CFR 136 to ensure compliance with current EPA Test Methods.

Have Your Say!

Here's your chance to help shape the vision for the San Jose/Santa Clara Water Pollution Control Plant and its 2,600-acre site along the southern San Francisco Bay. This May, we're holding five community workshops for public input on alternative scenarios for this large site. As we rebuild our aging Plant, we have the opportunity to create a new destination with economic, environmental, and social land uses that benefit our region. Get involved! Visit the Plant Master Plan website to:

Plant Master Plan

Plan the future of your South Bay shoreline and wastewater facility

- Locate the next Shape Our Shoreline community workshop.
- Sign up to take a free Plant tour.

Go to www.rebuildtheplant.org today!

Ask Your Inspector

Q: Why has my Inspector asked for additional TTO sampling?

A: Your Inspector could be making this request for various reasons. The City may have detected a violation or an unknown constituent in a sample or may have determined analysis as incomplete. The latter is common when semiconductors use method 624 to satisfy their TTO sampling and analysis requirement, unaware that method 625 is also needed to ensure that all permit-required constituents are tested.

All Industrial Users are responsible for knowing their TTO permit requirements. These requirements should be discussed with your lab, so that your analyses cover all organic substances listed in your permit.

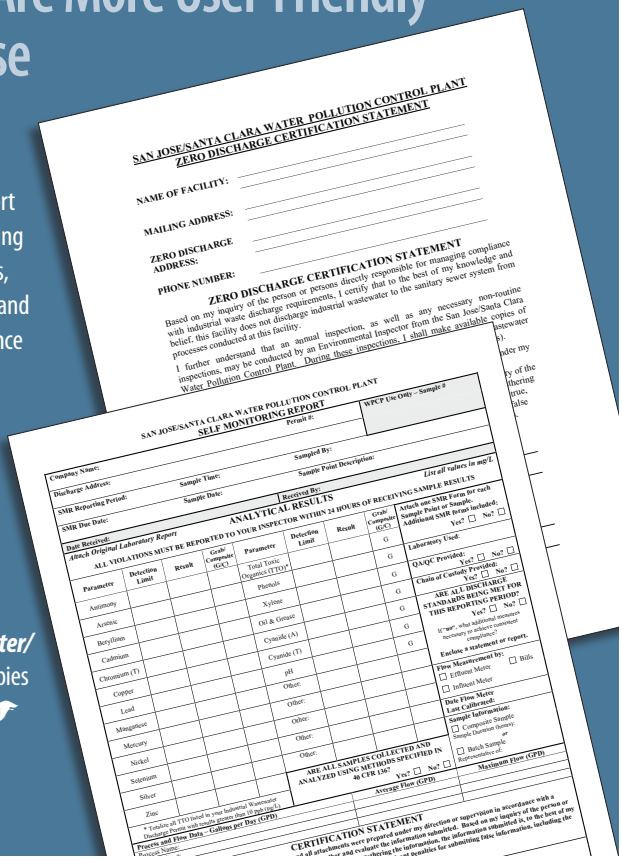
Do you have a question? Submit it for future publication consideration to ***tributary.tribune@sanjoseca.gov***.

Did You Know?

Updated Forms Are More User-Friendly – and Ready for Use

Two forms have now been retooled for easier use:

- The updated Self-Monitoring Report (SMR) form contains simpler wording and a new sequence of checkboxes, helping you ensure that sampling and analyzing methods are in compliance and your SMR is complete.
- The Zero Discharge Certification Statement has been updated for easier use and now includes more specific certification language.


SAN JOSE/SANTA CLARA WATER POLLUTION CONTROL PLANT
ZERO DISCHARGE CERTIFICATION STATEMENT

NAME OF FACILITY:

MAILING ADDRESS:

ZERO DISCHARGE ADDRESS:

PHONE NUMBER:

ZERO DISCHARGE CERTIFICATION STATEMENT

Based on my inquiry of the person or persons directly responsible for managing compliance with industrial waste discharge requirements, I certify that to the best of my knowledge and belief, this facility does not discharge industrial wastewater to the sanitary sewer system from processes conducted at this facility.

I further understand that an annual inspection, as well as any necessary non-routine inspections, may be conducted by an Environmental Inspector from the San Jose/Santa Clara Water Pollution Control Plant. During these inspections, I shall make available copies of

SAN JOSE/SANTA CLARA WATER POLLUTION CONTROL PLANT
SELF MONITORING REPORT

Please begin using these new forms immediately. You'll find them at ***www.sanjoseca.gov/esd/wastewater/discharger-forms.asp*** or request copies from your Environmental Inspector.

Watershed Workforce

Fadi Rofa

Fadi Rofa joined the City of San José's Source Control Team as an Assistant Environmental Inspector in May 2007. His duties include collecting wastewater samples at industrial and commercial locations, enforcing local and state regulations, creating and updating sampling schedules, inspecting facilities with temporary discharge permits, and training new employees. Fadi earned a bachelor's degree in chemistry and biology from Jerusalem University. As a hard-working member of the Source Control Team, he is known for his courteous service — within the department and throughout the community.

TributaryTribune

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City of San José
Environmental Services Department

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Quick – Test that pH!

In environmental science, the pH measurement is very sensitive. You're required to analyze it, but you have only 15 minutes to do so after collecting a wastewater sample. The EPA mandates this maximum 15-minute holding window because, upon collection, pH samples can be immediately impacted by thermal, biological, and chemical changes.

Technically speaking, a pH reading is a measurement of the acid in a solution. It is measured on a scale of 0 to 14 with the lower values indicating high hydrogen ion activity (more acidic) and high values indicating low hydrogen ion activity (less acidic). Pure water has a pH of 7, which is considered neutral. When a sample is collected, hydrogen ions can quickly begin interacting with other components of a solution, causing changes in pH levels. Immediate analysis, therefore, is needed to capture an accurate pH value.

Facilities that contract with a laboratory should make certain that pH measuring takes place **directly in the field** during sample collection. With the EPA's 15-minute maximum holding window, there is no time to take samples back to the lab for analysis.

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) 945-3000 (Voice) or (800) 735-2929 (CRS).

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