

## *In This Issue:*

- **Facility Inspections: The Big Picture**
- **Open for Business Means Open for Inspection**
- **Did You Know?**  
Pretreatment Program Forms Are Online
- **Ask Your Inspector**  
Are rebates available for water conservation projects?
- **Watershed Workforce**
- **EPA Audit Results**
- **2011 Industrial User Academy**

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.

## Facility Inspections: The Big Picture

*What they are and why they matter*

Controlling pollutants at their source helps local agencies do a better job of treating wastewater and protecting public health and the environment. To that end, the San Jose/Santa Clara Water Pollution Control Plant (Plant) Pretreatment Program conducts several types of routine facility inspections required by law. The explanations below will help you better understand and prepare for inspections at your worksite.

### Sampling Inspections

During these inspections samples are collected to monitor compliance with discharge requirements and obtain information on production schedules and water usage. Equipment such as pH meters and flow meters may also be checked; readings, sample point conditions, and any observed abnormalities are recorded. Sampling inspection frequency varies in conjunction with process variability.

### Compliance Inspections

These typically unannounced inspections can require a few hours to complete and occur one to four times per year to verify that your facility is meeting its permit conditions and discharge limits. Activities may include an inspection of chemical storage areas, wastewater generating processes, treatment areas, sample points, and monitoring equipment. Your Environmental Inspector (Inspector) may also discuss compliance issues and history, current contacts, and in-house self-monitoring records.

### Annual Inspections

These once-a-year visits also require a few hours to complete and are generally scheduled in advance.



*Sampling inspection of an Industrial User (IU).*

The inspection may include a review of changes to the treatment system, operational status and calibration of monitoring equipment, waste manifests, site shifts, and hours. Any process changes or new dilution streams that may affect your permit requirements will also be checked.

### Permit Inspections

These scheduled inspections are performed in order to review and process Industrial Wastewater Discharge Permit applications. This type of inspection requires a review of

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the entire facility and may include areas not typically covered in compliance or sampling inspections. Permit inspections verify the information submitted in the permit application and supporting documents. Examined areas may include:

- Industrial processes in use
- Equipment location and site layout
- Waste stream plumbing
- Chemicals used on-site
- Treatment system controls
- Sample point suitability
- Calibration and operation of monitoring equipment

Permit inspections may take several hours and require additional inspections, depending on the size and complexity of your facility and the accuracy of the information provided in the application. To facilitate this inspection and minimize the time it takes:

- Submit a complete permit application with diagrams of current process flow and process piping, including all wastewater sources and drainage plumbing to the sanitary sewer.
- Have knowledgeable staff available during the inspection to answer questions.

- Keep all supporting documentation in an easily accessible location and in good condition.

### Spill Inspections

If your facility has a spill to the sanitary system, you must **immediately** notify both the Plant at (408) 945-5300 and your Inspector. For spills to the storm drain system, you must notify your stormwater management program. Inspectors will document the facts of the spill. Your company must demonstrate that adequate measures were taken to contain the spill and that corrective measures will be taken to prevent future spills. Sampling and/or compliance inspections may be conducted following any spill.

### Closure Inspections

A scheduled inspection is required for both complete facility closure and closure of a manufacturing process. The inspection will verify compliance with discharge limits and removal of the process equipment. It also includes a review of hauling records for chemicals and wastes and the final closure date. ➤

## EPA Audit Results

The United States Environmental Protection Agency (EPA) conducted an audit and an inspection of the City of San José's Pretreatment Program. The audit took place October 28-29, 2009 and the inspection occurred January 24-25, 2011. Both the Pretreatment Compliance Audit and Pretreatment Compliance Inspection involved Industrial User (IU) inspections. The results of the audit and IU inspections identify requirements and recommendations for the Pretreatment Program. The City is currently working on a plan to address these concerns and will communicate information to IUs via the **Tributary Tribune** and other communication methods so be on the lookout for important future updates. ➤

## Open for Business Means Open for Inspection

As a permitted Industrial User (IU), you're accustomed to seeing your Environmental Inspector (Inspector) during regular business hours. But did you know Inspectors also conduct off-hour and weekend inspections? That's why trained and knowledgeable personnel should be on-site during *all* shifts.

### Right of entry

According to your permit, Inspectors have the right to enter your facility during all business hours to conduct an inspection. An Inspector may show up at your worksite at any time of any day you are operating. As a permitted IU, you should be aware that refusing entry to your Inspector could result in enforcement action.

### When your Inspector visits

Upon arriving at your facility, the Inspector will check in with security personnel or your receptionist, provide identification, and ask for the environmental contact or designee.

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### Did You Know?

## Pretreatment Program Forms Are Online

Government forms are a fact of life, and for Industrial Users (IUs) finding and filling out required paperwork can sometimes be a frustrating experience, but Pretreatment Program staff is working to make it easier.

To better serve its industrial customers, the Pretreatment Program makes all Wastewater Discharger Forms available in one central location: our website. So, if you need to submit a form to your Environmental Inspector, you'll find it at [www.sanjoseca.gov/esd/wastewater/discharger-forms.asp](http://www.sanjoseca.gov/esd/wastewater/discharger-forms.asp).

Included on the website are commonly used forms such as Industrial Wastewater Discharge Permit Applications, Self-Monitoring Reports (SMRs), Zero Discharge Certifications, and TTO Certifications. In addition to forms, the site also offers information and resources on plan checks, along with worksheets, checklists, and schedule templates.

If you have questions about required forms at your facility, contact your Environmental Inspector at (408) 945-3000. ➤



### **Conducting an Industrial User (IU) inspection.**

Each shift should have both primary and back-up contacts, and your staff should know who serves in these roles. Your staff should also be aware that Inspectors cannot sign confidentiality statements. Most such statements prevent the collection of information and/or reporting of observations. Because Inspectors are government agents, their findings and reports are legally part of the public record.

### **Collecting the data**

Inspectors gather information from your facility to determine compliance with your permit conditions. Your primary and back-up contacts should have quick access to all records required under your permit and be knowledgeable of the production and treatment processes. Data collected includes meter and pH readings; samples are also collected for analysis. If the Inspector wishes to take any photographs, he or she will first obtain your consent. In addition, your Inspector may request copies of facility records, including flow logs, meter logs, calibration certificates, and/or manifests.

Granting an Inspector quick entry and being ready with records will save time for your staff and Inspector alike. 🐾

## *Ask Your Inspector*

### **Q: Are rebates available for water conservation projects?**

**A:** Yes! The Water Efficient Technologies (WET) program offers rebates of up to \$50,000 to commercial and industrial customers who complete projects that reduce wastewater discharge. WET serves facilities within the eight-city service area of the San Jose/Santa Clara Water Pollution Control Plant, including San José, Santa Clara, Milpitas, Cupertino, Saratoga, Campbell, Los Gatos, and Monte Sereno.

Rebates are a great way to help finance and garner support for water conservation projects and are often key to reducing payback periods. They also help save money on water, sewer, and energy bills as consumption and discharge decrease.

Past sample projects include:

- Rinse water reuse systems
- Automated rinse lines
- Reverse osmosis reject reuse for cooling tower feed water
- Cooling tower upgrades
- Closed-loop cooling systems

To be eligible for a rebate, your proposed water conservation project **must be approved prior to any related purchases or implementation**. If you're considering a project, be sure to visit [www.sanjoseca.gov/esd/water-conservation/business/wet.asp](http://www.sanjoseca.gov/esd/water-conservation/business/wet.asp), where you'll find details and project success stories. Contact Andrea Case at (408) 793-5327 or email [esdwet@sanjoseca.gov](mailto:esdwet@sanjoseca.gov) for more information or questions. For additional water savings tips, rebates, and programs visit [www.valleywater.org/Programs/ConservationForBusinesses.aspx](http://www.valleywater.org/Programs/ConservationForBusinesses.aspx). 🐾

Do you have a question?

Submit it for future publication consideration to [tributary.tribune@sanjoseca.gov](mailto:tributary.tribune@sanjoseca.gov).

## *Watershed Workforce*

### **René Eyerly**



It is our pleasure to announce the appointment of René Eyerly as the new Environmental Services Department (ESD) Program Manager for the Pretreatment Program. René is not entirely new to the City of San José; from 1996-2000 she worked for ESD on water conservation and integrated waste management programs and was on the San Jose/Santa Clara Water Pollution Control Plant Permit team. René Eyerly has 20 years of experience in environmental programs and services. She has worked in both the private and public sectors, including work in water quality, solid waste, and stormwater management. After leaving ESD, she managed the urban runoff program for West Valley Sanitation District and was a division manager for Parametrix Consulting. René has a Bachelors degree in Biology and a Masters in Environmental Management from Yale University. She is thrilled to be returning to San José and ESD and is looking forward to working with our Pretreatment Program team. 🐾

# TributaryTribune

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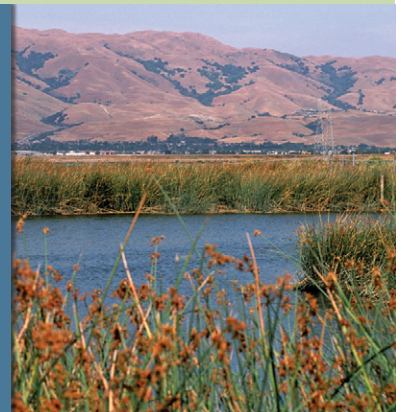
## 2011 Industrial User Academy

**M**ark your calendar! This year's Industrial User (IU) Academy is scheduled for Wednesday, April 27 at the San Jose/Santa Clara Water Pollution Control Plant (Plant). The free event is hosted by the City of San José and is open to all IUs within the Plant's eight-city service area (including San José, Santa Clara, Milpitas, Cupertino, Saratoga, Campbell, Los Gatos, and Monte Sereno). Lunch will be provided to all participants, and the day concludes with a guided tour of the Plant.

Those attending will have ample opportunity to ask questions and will hear timely updates and helpful tips during informative presentations on:

- Industrial Wastewater Discharge Permit requirements and applications
- New regulations and ordinances
- Federal pretreatment standards
- Self-Monitoring Reports
- What Inspectors look for during inspections
- Water Efficient Technologies (WET) rebate program

Watch the mail or ask your Environmental Inspector for your invitation. Seating is limited so please RSVP as soon as possible. For more information contact Jack Judkins at [jack.judkins@sanjoseca.gov](mailto:jack.judkins@sanjoseca.gov) or (408) 793-5326.



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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