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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.

A Double Dose of Safety | Secondary containment shores up procedures for toxic materials

Your company may not be involved in deep-water drilling, but the catastrophic BP oil spill in the Gulf of Mexico offers a tragic lesson for local businesses: Frontline safety systems to capture unplanned leaks aren't enough; you need backups, too.

This is where secondary containment comes in. By law, your company is required to provide an extra layer of controls, separate from your primary containment system. Secondary containment devices include containers, tanks, bermed areas, cabinets, and pallets. They serve as additional safeguards against unexpected spills or leaks of hazardous compounds.

A number of rules and regulations govern the use and disposal of toxic materials. Your local fire department and Santa Clara County's Department of Environmental Health can provide information on handling, storage, and management requirements for any hazardous wastes and hazardous materials used by your facility.

Your Inspectors work in tandem with the government agencies that enforce the laws for hazardous wastes and hazardous materials. During a visit, they will verify that the requirements for your Wastewater Discharge Permit — which include provisions for waste hauling, labeling, secondary containment, and spill management — are being met.

Preventing illegal substances from entering the sanitary sewer or storm drains requires vigilant monitoring. By strictly adhering to the procedures for secondary containment, you protect your business and employees as well as the employees and infrastructure of the San Jose/Santa Clara Water Pollution Plant and ultimately the San Francisco Bay.

Avoid these common violations

Costly fines and enforcement actions are among the unpleasant consequences for companies that violate hazardous waste regulations. The electroplating industry, which generates substantial amounts of toxic materials, is especially at risk of incurring penalties, according to the California Department of Toxic Substances Control (DTSC). For detailed information on eight common violations at metal plating shops, visit www.dtsc.ca.gov/HazardousWaste/upload/HWM_FAQ_PLATERS-GUIDANCE.pdf.

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The DTSC offers suggestions on how to prevent or correct such violations. Here are a few things you can do:

Provide adequate secondary containment. You must keep onsite a written assessment from a qualified, independent California-registered engineer that describes your secondary containment system and statements of compliance for all tanks and containers.

Segregate incompatible substances. All containers holding incompatible or reactive substances or wastes, such as cyanide and acidic wastes, must be separated by dikes, berms, walls, or other means capable of keeping the wastes from mixing if a spill occurs.

Train employees and maintain training records. Be sure to provide adequate classroom and/or on-the-job

training to all employees who manage hazardous wastes. Maintain records of these training sessions.

Immediately clean up spills. Make sure training includes instruction for your employees on how to immediately clean up spills of hazardous chemicals. Any delay can result in serious threats to the health and safety of employees and to the environment. Spill kits should be stocked with supplies appropriate for each potential spill and readily available, so make sure they aren't stored behind other equipment or otherwise inaccessible. Also, make sure that training and instructions are on hand for dealing with the spent absorbent, since in most cases it too will become a hazardous waste and will need to be disposed of accordingly.

Correctly label containers and tanks. Receptacles containing hazardous

chemicals and wastes must be labeled with:

- Name and address of your facility
- Accumulation start date (the date that the first drop of waste was placed in the container)
- Identity or source of the waste (e.g., spent plating solution)
- Properties that make the waste hazardous (e.g., contains cyanide, dissolved metals, or acid)
- Hazardous characteristic of the waste (e.g., toxic, corrosive, ignitable, or reactive)
- Physical state of the waste (liquid or solid)

For more information on secondary containment, visit the following websites:

www.unidocs.org/

www.ehinfo.org/hazmat 




Did You Know?

Some samplers must be pretty cool



Photo courtesy of San José State University.

If your permit requires you to sample for certain items such as composite Biological Oxygen Demand, Total Suspended Solids, and Ammonia, then make sure there is a refrigerator handy. Your facility permit also requires that you maintain a refrigerated composite sampler at a certain temperature. According to 40 CFR 136.3 guidelines for preserving wastewater samples, refrigeration must be maintained at 4°C for these samples. This chilly temperature ensures accurate laboratory results by preserving the properties of your sample. 

Dilution is No Solution

Not so many years ago, the conventional wisdom was that toxins could be neutralized if you mixed them with large quantities of water. Now we know that “dilution is no solution to pollution.” In fact, it’s illegal.


Industrial Users (IUs) are prohibited by law from bypassing any necessary treatment of pollutants and thereby contaminating local waters. IUs may not divert wastewater streams from any portion of their treatment facilities, or dump or discharge hazardous waste. The excuse of “no feasible alternative” is no longer acceptable.

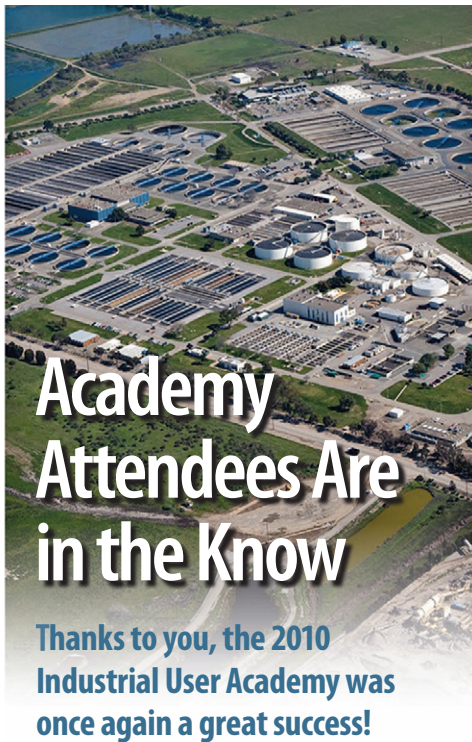
IUs cannot, intentionally or unintentionally, use wastewater (in most cases rinse waters) to dilute the regulated waste stream to meet discharge limits. Nor is it permissible for IUs to dilute by commingling process and non-process wastewaters.

Environmental Inspectors can cite a facility if they observe industrial wastewaters being generated unnecessarily. For example, a citation could be issued if

products or parts are not actually in the process tank while the rinse waters are flowing. Ensuring that wastewater streams are not diluted will help your facility avoid potential violations as well as conserve water and thus reduce water bills.

Reasonable control measures should be used to minimize waste and conserve water. These measures may include using drag-out tanks, counter-current flow rinses, sensor-activated rinses, spray rinses, work-piece agitation, etc. To assist you and your company with water saving ideas and techniques, ask your Inspector for a copy of “Guidelines for Efficient Water Use” and “Guidelines for Industrial Wastewater Reuse” or access a digital copy under “Business Resources” at www.sanjoseca.gov/esd/pub_res.asp#businessresources.

Water conservation projects may be eligible for a rebate of up to \$50,000 under the City’s Water Efficient Technologies (WET) program. Your Inspector can provide details or visit www.sanjoseca.gov/esd/water-conservation/business/wet.asp. 



Academy Attendees Are in the Know

Thanks to you, the 2010 Industrial User Academy was once again a great success!

Thirty-five representatives from 25 different facilities participated in the Academy held April 28 at the San Jose/Santa Clara Water Pollution Control Plant. Attendees received information about important regulatory and compliance issues presented by the same Inspectors who work with their companies. Participants also reviewed the wastewater discharge permit application process and inspection program and learned how their companies can receive up to \$50,000 in rebates from the Water Efficient Technologies (WET) program. The day concluded with a tour of the Plant and Laboratory facilities.

Topics for the presentations were selected, in part, from comments collected at last year's Academy. If there are subjects you would like to see addressed at next year's Academy, let us know. Contact Andrea Case at andrea.case@sanjoseca.gov or (408) 277-3673 with your feedback and suggestions.

Congratulations to all who attended this year's Academy. Stay in the know and plan to attend the 2011 Industrial User Academy! 🐾

Ask Your Inspector

Q: What does Zero Discharge mean?

A: Since 2008, the City has permitted facilities called "Zero Discharge Categorical Industrial Users." Zero Discharge Categorical Industrial Users are facilities that engage in any categorical process subject to federal pretreatment standards (described in 40 CFR 405 – 471) and have any connection to the sanitary sewer system, including the discharge of domestic waste only. "Zero Discharge" should not be taken literally because discharges do occur from some facilities that hold this designation. One of two types of certifications is required from all Zero Discharge Categorical Industrial Users:

1. The first type is the "Zero Discharge Certification Statement." This certification statement is required from all dischargers who have a categorical process but only discharge domestic wastewater from the facility.
2. The second type is called the "Zero Discharge Certification Statement for Categorical Process Only." This certification is required from facilities that do not discharge from a categorical process but may still discharge from other non-categorical industrial processes. This group includes facilities that have a wastewater discharge permit for their non-categorical discharge. These facilities should include a "Zero Discharge Certification Statement for Categorical Processes Only" with their Self-Monitoring Report (SMR).

All permitted users should consult their wastewater permits for the required submission dates of certificates.

Ask your Inspector for up-to-date Zero Discharge Certification forms, or download the forms from the website at www.sanjoseca.gov/esd/wastewater/discharger-forms.asp. 🐾

Do you have a question?

Submit it for future publication consideration to tributary.tribune@sanjoseca.gov.

Watershed Workforce

Liz Tyson



Liz Tyson joined the City of San José's Environmental Services Department, Watershed Protection Division, in October 2007. Before that, she spent six years working in the environmental field for private and government agencies. Since joining the City, Liz's responsibilities have increased, progressing from industrial wastewater sampling to inspecting industrial facilities and enforcing wastewater discharge permits. As a new member of the Source Control team, she works hard to help companies maintain compliance with federal, state, and local regulations, and strives to improve the City's pretreatment program. A graduate of Humboldt State University, Liz holds a B.S. degree in oceanography and has a minor in applied mathematics. She also earned a Graduate Certificate of Study in Geographic Information Systems (GIS) and Remote Sensing. 🐾

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TributaryTribune San Jose/Santa Clara Water Pollution Control Plant | Summer 2010

National Pollution Prevention Week Resource Fairs **September 20-26, 2010**

Help keep pollutants out of our waterways!

- Bring expired or unwanted medicines to a FREE drop-off
- Receive a FREE digital thermometer in exchange for your old mercury thermometers
- Bring in this ad and receive a FREE reusable shopping bag

To find your nearest Resource Fair location, visit our website www.sanjoseca.gov/esd/calendar.asp or call (408) 945-3000.



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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0810/Q1400/JY/DM/RB

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