

TRIBUTARY TRIBUNE

Composite Sampler O & M

If you're an IU that has an on-site automated composite sampler (auto-sampler), you have probably received phone calls from our staff instructing you to activate your auto-sampler so we could come pick up the composite sample the following day. For the most part, this arrangement has worked well; however, there have been instances when the sample could not be collected because of an IU's failure to either activate the auto-sampler or keep it operational.

Permit Requirements

If Section B3 of your discharge permit requires you to have an auto-sampler, it is your responsibility to maintain it so that it is in operational condition at all times. Failure to maintain your sampler is a violation of the municipal codes governing discharge to the sewer, under the "Permit Conditions" and "Monitoring Facilities" sections. Remember that our staff could ask you to turn on your auto-sampler at any time; if it is not operational, you will immediately be in violation of your permit requirement.

Section B3 of your permit will also specify whether the auto-sampler must be refrigerated, and if the composite samples collected will be time proportional (a portion collected every so many minutes) or flow proportional (a portion collected every so many gallons of discharge).

Operational Issues

To program an auto-sampler, consult the owner's manual or the manufacturing company representative. You must calibrate the portion volume collected so the composite sample collected by the equipment is neither too small in volume nor overflowing the bottle.

Tubing collecting the composite sample must be placed so sample portions collected are representative of the wastewater being discharged through the sample point at that moment. If there is no wastewater discharge, there should be no portion collected at that moment. However, if a waste stream discharges through the sample point 24 hours a day, such as from a fume-scrubber, your composite sample time frame should be for a full 24-hour period, not just the production workday.

Maintenance Issues

If you are not sure what maintenance should be done on an auto-sampler you have purchased, consult the owner's manual, or the company web site or representative. Some manufacturers offer service contracts that will cover maintenance and repair of your auto-sampler.

Keep a logbook of maintenance and repairs performed on your sampler, including those performed by outside contractors. Records of refrigeration equipment repairs, pump-tubing replacement, desiccant changing, bottle and tubing cleaning, etc. will document that you maintain your equipment.

Note: If you are required to collect flow proportional samples, remember to also maintain the electronic interface equipment between your auto-sampler and flow meter in operational order.

Consequences for Violation

Violating permit conditions can be expensive; an IU can be liable for up to \$50,000 *per day* in civil penalties. Avoid unnecessary penalties by properly maintaining your auto-sampler and staying in compliance with Section B3 of your wastewater discharge permit.

If you have questions on this article, please contact your inspector at (408) 945-3000.

www.sanjoseca.gov/esd

The **Tributary Tribune** serves the cities of San José, Santa Clara, Milpitas, Cupertino, Sanitary District, West Valley Sanitation District (including Campbell, Los Gatos, Monte Sereno, Saratoga), County Sanitation Districts 2-3, Sunol & Burbank Sanitary Districts

Update: 2005 EPA Administrative Order Impacts

Previous issues of the newsletter reported on the 2005 Administrative Order issued to the City of San Jose by the EPA. The Administrative Order outlines new compliance mandates and corresponding implementation deadlines directed at our Pretreatment Program. The following progress has occurred since the last issue:

- We have completed an internal review of the municipal code serving as our Sewer Use Ordinance. IUs could receive new requirements as a result.

- We have completed a technical evaluation of local limits (i.e., an analysis of what pollutants call for discharge limits in our Sewer Use Ordinance and what those numeric limits might be). You could be asked to participate in a public review process shortly. IUs could receive revised local limits as a result.
- Staff has drafted a new permit format to include additional data elements. Permits issued since June 2005 are in this new format.

All other permits may be amended over the next two years.

If you have any questions on the Administrative Order, please contact John Mukhar at (408) 277-5696 or by e-mail at John.Mukhar@sanjoseca.gov.

EPA Releases Pretreatment Streamlining Final Rule

EPA has approved long-anticipated changes to the federal pretreatment requirements found at 40 CFR 403 and published the rule in the Federal Register on October 14, 2005. The final "pretreatment streamlining" rule is designed to reduce the burden to users, protect the environment, and provide more flexibility in technical and administrative requirements affecting industrial users, municipal sewage treatment facilities, state and EPA authorities. The changes became effective November 14, 2005.

The City is currently reviewing this rule and is in discussion with EPA Region 9

and the Regional Water Quality Control Board to determine how it will impact the Plant's pretreatment program and what changes the program will need to implement. Some of the changes are optional for implementation while others are not. A few of the major changes in the rule are:

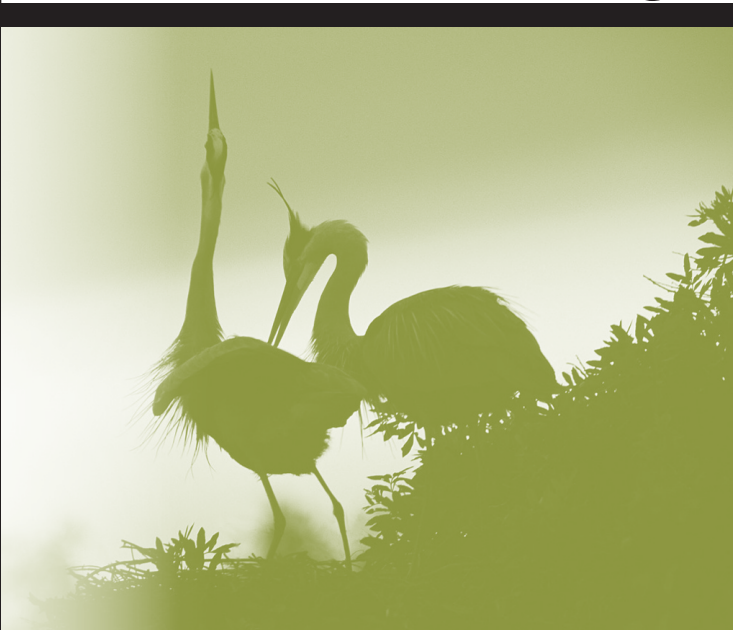
- POTWs may grant monitoring waivers to industrial facilities where it can be documented that pollutants are not present
- POTWs may issue a single general permit to multiple industrial dischargers that share common characteristics

- Provides clarification on when or how BMPs can be used as an alternative to numeric permit limits
- Establishes a new class of categorical industrial users; those discharging below 5000 gpd are no longer considered significant industrial users

For more information, please visit cfpub.epa.gov/npdes/ and click on "final pretreatment streamlining rule."

New! For Industrial Users

Surveillance Monitoring Fact Sheet Now Available



City staff has developed a Surveillance Monitoring fact sheet, a copy of which was mailed to your company in October 2005. In addition to giving notice on our ongoing surveillance-monitoring program, the fact sheet includes information on:

- How the City identifies facilities for possible surveillance
- Examples of human errors (communication, scheduling, training, and other issues) and technical problems (plumbing errors, sediment accumulation, etc.) that contribute to higher loadings at surveillance sample points
- How IUs can detect and prevent bypass of waste treatment systems

You can download a copy at www.sanjoseca.gov/esd/water-pollution-prevention/PDFs/SM-FactSheet.pdf. If you have any questions on the fact sheet or the City's Surveillance Monitoring Program, please call your inspector at (408)-945-3000.

We Have Moved!

The ESD Watershed Protection Division office has relocated to **170 West San Carlos Street**, San Jose, CA 95113 (next to the Convention Center in downtown San Jose). Our main phone number remains **(408) 945-3000**. Our fax number, however, has changed to (408) 277-5775.

A location and parking map is available at www.sanjoseca.gov/esd/water-pollution-prevention/. Validated parking is available at the San Jose Convention Center parking garage. The following programs/services have moved to the new location:

- Source Control Program (industrial pretreatment inspections, sampling, surveillance monitoring, and industrial wastewater discharge permits)
- Stormwater Inspection Program (within San Jose)
- Wastewater Plan Check Program
- Water Efficient Technologies (WET) Program

Time-sensitive material such as responses to NOV's, written follow-up on a spill, or SMRs should be sent to our new address rather than to the Water Pollution Control Plant.

If you have any questions about our relocation, call **(408) 945-3000** or contact your source control inspector directly.

EPA Annual Review of Effluent Guidelines

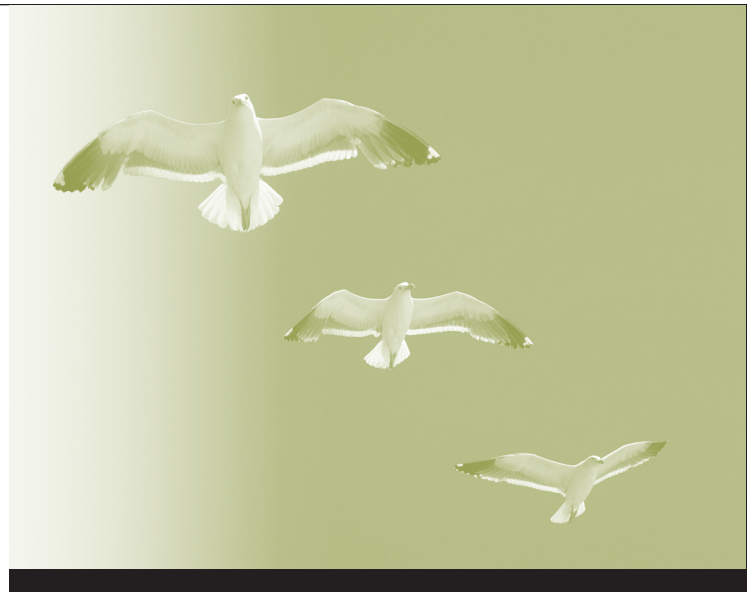
Based on the type of industrial or production processes, the EPA has identified 56 industrial categories that have technology-based effluent limits. The Clean Water Act requires the EPA to publish an effluent guidelines program plan biennially. This plan will state which, if any, of the existing 56 federal categories will be evaluated for possible changes. The EPA determines if any new processes not already subject to the categorical standards should be addressed as a new subpart or added to an existing one, and whether any of the numerical limits need fine-tuning.

A number of factors are used in selecting a pretreatment category for evaluation. These include the quantity of toxic pollutants released by that industry, the amount of time since the last detailed review of that category, and the cost and performance of improved technology or pollution prevention alternatives to reduce the pollutants released by this industry, especially to wastewater.

For 2006, the EPA has identified Steam Electric Power Generation (40 CFR 423) and Pulp, Paper, and Paperboard (40 CFR 430) as the categories that require further scrutiny and is already working with the respective trade associations to gather more information. Although no specific changes to either category have been proposed at this time, any Industrial User subject to the above two categories can expect new or altered requirements.

All Categorical Industrial Users, not just IUs in the above categories, should be aware that their federal requirements could change during future EPA reviews. Page 1 of your wastewater permit will state your EPA category, if applicable.

Please contact your Inspector for any questions on your permit. For details on the EPA's 2006 effluent guidelines program plan, visit www.epa.gov/guide/plan.html.



Wanted! Website Focus Group Volunteers for February

The City of San José plans to update the water pollution prevention section of its website at www.sanjoseca.gov/esd/water-pollution-prevention/. We would like to invite Industrial Users to participate in a usability study some time in February.

If you are interested and available, *please send an e-mail by Friday, January 20th* to ESDWebmaster@sanjoseca.gov with the subject line "Website Focus Group." Include your full name, daytime phone, and mailing address. We will then contact you to provide more information about the focus group session and to set up an appointment.

We look forward to partnering with you to make the website your first choice source for 24/7, on-demand information.

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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).



www.sanjoseca.gov/esd

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Industrial User Academy Coming this Spring

Coming soon! The Industrial User (IU) Academy will be offered at the Water Pollution Control Plant on **April 19-20, 2006** from 8am-noon.

This **FREE** class is an excellent opportunity to learn more about the Pretreatment Program requirements and topics such as:

- Understanding your wastewater discharge permit
- What to expect during an inspection
- How to collect samples
- Mistakes to avoid on your Self-Monitoring Reports (SMRs)

Contact the IU Academy Coordinator, Pascal Roubineau, at **(408) 277-2660**, or at **pascal.roubineau@sanjoseca.gov** to request priority seating before the official **registration period begins in March 2006**.



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