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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 and Burbank Sanitary Districts.

## New Local Limits Adopted for Industrial Users

On December 4, the San José City Council approved final adoption of new local limits for businesses with process wastewater discharge permits. Tributary cities and sanitary districts served by the San Jose/Santa Clara Water Pollution Control Plant, but located outside of San José city limits, are expected to present the new limits to their governing bodies for adoption by February 2008.

Permitted Industrial Users located in San José may already have been notified of the amendments to their permits based on Council's first reading of the ordinance in November. Affected businesses in cities and sanitary districts outside San José will receive amendments to their permits shortly after their governing bodies act.

### Copper and Nickel Limits Simplified

For businesses discharging 1,000 gallons or more per day (gpd), local limits for copper and nickel have been simplified from a three-tiered approach to a single "maximum allowable concentration" limit. The new limits for copper and nickel are 2.3 mg/L and 0.5 mg/L respectively.

For businesses discharging *less* than 1,000 gpd, the existing maximum allowable concentration limits of 2.7 mg/L for copper and 2.6 mg/L for nickel were retained.

### Changes to Limits for Total Toxic Organics, Xylene, Manganese, and Selenium

Local limits apply to all permitted Industrial Users, whereas the Categorical limits from the Code of Federal Regulations apply only to specific industry types.

- Local limits for Total Toxic Organics (TTO) have been deleted, although federal pretreatment TTO limits *still apply* for categorical Industrial Users.
- Xylene will no longer have a separate local limit, but will still be included in the federal list of TTOs.
- Permits will no longer have local limits for xylene and manganese.
- The current maximum allowable concentration limit of 2.0 mg/L for selenium was reduced to 1.0 mg/L.

All other local limits remain the same.

### Local Limits Evaluation

Substantial changes to local industrial and commercial demographics have occurred since the limits were last updated in 1994 — and local industries reduced copper and nickel loading by more than 50 percent in the 5 years after that through participation in an extensive pollution prevention program.

These and other factors led the Environmental Protection Agency (EPA) in 2005 to call for a re-evaluation of 17 pollutants of concern. Following City staff analysis and documentation, EPA and the Regional Water Quality Control Board approved the new local limits this past June. Since then, meetings and public hearings have been held to obtain input from affected businesses. The changes will have no impact on the treatment plant's ability to meet its effluent limits, and beneficial uses in the South Bay will continue to be protected.

*Continued on next page*

In this latest local limits review, the City recommend changes based on the EPA's 2004 *Local Limits Development Guidance*. Table 1 summarizes the modifications to the City's industrial local limits resulting from this evaluation. ➤

## Ask Your Inspector

**Q:** I'm trying to keep my costs down. How important is it to keep extra parts on hand in case of needed repairs?

**A:** Don't Spare the Spare Parts

Equipment failures can impact a facility's compliance status. A broken treatment system can result in wastewater discharge violations and noncompliance. To shorten down time, and avoid noncompliance — provide immediate access to replacement parts for industrial wastewater treatment systems.

Some manufacturers embrace the popular inventory concept, "Just-in-time (JIT) replenishment". They keep either a minimal inventory or none at all, placing orders based on need. The JIT approach doesn't consider emergency breakdowns, vendors going out of business or on strike, or materials shortages. Using the JIT approach, replacement parts may not be readily available, and you could be left with an inoperable wastewater treatment system.

To minimize "down time," every treatment system should have a spare parts kit customized for the location, based on specific system, configuration and treatment system requirements. Your parts kit should be stocked, organized and readily available on site.

Effective spare parts management plays a critical role in avoiding violations, and keeping wastewater treatment operations running smoothly. ➤

Table 1 Adopted Local Limit		
Constituent	Existing Local Limits (mg/l)	Modification
Antimony	5.0	No modification at this time
Arsenic	1.0	No modification at this time
Beryllium	0.75	No modification at this time
Cadmium	0.7	No modification at this time
Chromium, Total	1.0	No modification at this time
Copper	Group 1 2.7 maximum allowable and individual limits Group 2 either 1.0 daily maximum or 2.7 maximum allowable and 0.4 annual average Group 3 2.7 maximum allowable	<ul style="list-style-type: none"> <li>■ For discharges of 1000 gpd or more, consolidate to one maximum allowable concentration limit of 2.3 mg/L</li> <li>■ For discharges less than 1000 gpd, the existing maximum allowable concentration limit of 2.7 mg/L applies.</li> </ul>
Cyanide	0.5	No modification at this time
Lead	0.4	No modification at this time
Manganese	35.0	Delete local limit
Mercury	0.010	No modification at this time
Molybdenum	None	No addition at this time
Nickel	Group 1 2.6 maximum allowable and individual limits Group 2 either 1.1 daily maximum or 2.6 maximum allowable and 0.5 annual average Group 3 2.6 maximum allowable	<ul style="list-style-type: none"> <li>■ For discharges of 1000 gpd or more, consolidate to one maximum allowable concentration limit of 0.5 mg/L</li> <li>■ For discharges less than 1000 gpd, the existing maximum allowable concentration limit of 2.6 mg/L applies.</li> </ul>
Selenium	2.0	Reduce local limit to 1.0 mg/L
Silver	0.7	No modification at this time
Zinc	2.6	No modification at this time
Total Phenol	30	No modification at this time
Xylene	1.5 and included in TTO limit	Delete local limit of 1.5 mg/L
Oil & Grease	150	No modification at this time
TTO	2.13	Deleted

## Watershed Workforce

### Tellis Hynes



Tellis Hynes has logged 17 years as a Source Control Environmental Inspector with the City of San José's Environmental Services Department, Watershed Protection Division. Tellis is responsible for permitted and zero discharge certified facilities inspections, and is the lead in compiling the semi-annual and annual reports. Currently, Tellis is serving on the California Water Environment Association sub-committee selecting the Industry of the Year Award recipients. Before coming to San José, he was with Los Angeles County Sanitation Districts for 21 years, first as a senior lab tech, and then as an Industrial Waste Inspector. ➤



## Wastewater Discharge Permitting Simplified

Simultaneous with adoption of new local limits (see p. 1), changes to Industrial Wastewater Discharge Permits are also in process and will simplify the permitting system.

The changes will affect Significant Industrial Users (SIUs). SIUs include businesses that have an average process flow of 25,000 gallons per day or more, or that are classified as a federal "Categorical" industry. All of the changes discussed in this article are changes to text in the permit clarifying procedures for collecting and analyzing wastewater samples.

The changes clarify:

- How TTO compliance is determined.
- That compliance is determined using all applicable limits.
- Changes affecting sampling frequency.
- The time frame for completing "re-sampling" after a violation.
- Transferability of permits.

The City of San José conducted the review of local wastewater discharge limits in response to a requirement from the EPA and the Regional Water Board. The City used the EPA's 2004 "Local Limits Development Guidance."

### Section A Changes

**Section A.1, Federal Discharge Conditions** — These will be modified to clarify how compliance with federal Total Toxic Organics (TTO) limits is determined. The language clarifies that the term "Total Toxic Organics" (TTO) actually describes a group of pollutants. The laboratory analysis looks for any of the pollutants in a list found in the Code of Federal Regulations, and then adds all of those pollutants found at a concentration greater than 0.01 milligrams per liter together to produce a single sum. The resulting sum is compared to the TTO limit for that business. The new language states:

***"Compliance with the federal discharge limit for Total Toxic Organics (TTOs) is determined by the sum of Total Toxic Organic compounds for the Federal Categorical Standard(s) applicable to your facility, listed in the attached table, and which are found to be present in the discharge at a concentration greater than ten (10) micrograms per liter."***

**Section A.1., New language** — For some substances, and depending on your type of business, there may be multiple limits that apply. New language was added to clarify that compliance is evaluated by looking at all applicable limits for each sample parameter in your permit.

*Example:* Your copper result from a composite sample comes back at 2.25 mg/l. Both daily maximum and monthly average federal limits apply for the Metal Finishing category. This is not a violation of the federal daily maximum limit, but, if you have not collected other samples in the month, this would be a violation of your federal monthly average limit for copper. *Note:* If you have a violation, you will need to resample and submit those results within 30 days of becoming aware of the violation.

**Section A. 2, "Monitoring Conducted by SJ/SC WPCP"** — The following language has been added to clarify that sampling can be more frequent than the listed minimum, and that the day, date, and time of POTW sampling is up to the SJ/SC WPCP:

***"Table (refers to a table in the permit) reflects the minimum frequency for scheduling and collecting Grab and Composite Samples. The number of samples collected may be increased at the discretion of the SJ/SC WPCP, and when the POTW sampling is conducted is also at the discretion of SJ/SC WPCP."***

### Section B Changes

Language was added to emphasize that when a violation is detected, the complete resampling process must be completed in 30 days — This is both a federal and a local requirement (see Table 2 below).

***"All industrial users must resample, analyze the samples and submit the resampling results within 30 days of becoming aware of a violation."***

**Section B.2, Self Monitoring.** For facilities classified as a Significant Industrial User, the frequency of how often you must self monitor has changed depending on your discharger category:

Table 2 Self Monitoring Frequency			
Discharger Category	Definition	Current Monitoring Frequency	New Monitoring Frequency
Non-variable	Discharges less than 5,000/gpd and does not change over time or days; has ion exchange, membrane or ultra filtration.	Semi-Annual	No Change
Variable	Discharges over 5,000/gpd and does change over time or days; does not have ion exchange membrane or ultra filtration.	Semi-Annual	Quarterly
Extremely Variable	A Centralized Waste Treatment Facility	Semi-Annual	Monthly

### Section E Changes

Under **Section E. Stipulations**, the following ordinance section has been added to the Permit to highlight that permits are "non-transferable":

***"Wastewater Discharge Permits are issued to a specific user for a specific operation. No user shall assign, transfer or sell a Wastewater Discharge Permit, or use the permit on premises or for facilities or operations not covered by the permit."*** ↗

## TributaryTribune

Watershed Protection Division  
City of San José Environmental  
Services Department

170 W. San Carlos Street  
San José, CA 95113  
Phone 408-945-3000  
Fax 408-277-5775

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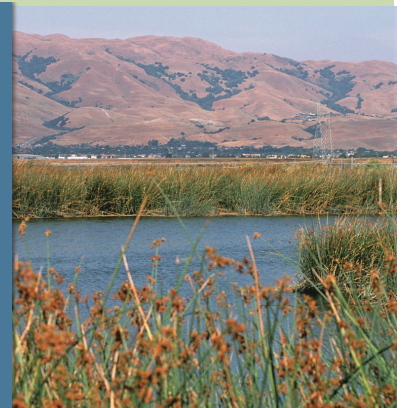
# Free Water Surveys for Businesses: Average \$26,000 Savings Potential

By Karen Morvay  
*Santa Clara Valley Water District*

The Santa Clara Valley Water District wants to help businesses save water, energy and money, and is offering **free** water surveys for commercial, institutional and industrial customers in Santa Clara County. Last year the average cost savings potential identified for a typical industrial water user was **\$26,000 per year** — simply by making their facilities more water efficient.

The free, comprehensive indoor water surveys are a great way for businesses to identify potential water efficiency opportunities. After the survey is completed, a report is generated that contains a summary analysis of each facility's water use, cost-saving recommendations, and information on Water District programs that help pay for recommended water efficiency projects.

Surveys are conducted on a first to apply, first-served basis. To sign up or to ask questions, contact David Isaacson of WaterWise Consulting at (408) 496-6965 or [disaacson@waterwise-consulting.com](mailto:disaacson@waterwise-consulting.com). You can also contact Karen Morvay, Water Conservation Specialist for the Santa Clara Valley Water District at (408) 265-2607, ext. 2707. 🐾



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Printed on recycled paper.

bf/12-07/1400cp/1400/JY/DM  
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