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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.

## Training – It's Your Ounce of Prevention

### *How often do you train your employees?*

**W**hen your Inspector asks you this question, you have the opportunity to demonstrate how your ongoing training investment exemplifies your company's progress and commitment to compliance.

If you have a wastewater discharge permit, most likely it's because your company has some unique production characteristics. It is also likely that your wastewater treatment system — whether highly automated or manually managed — has its own unique requirements. If you've been managing wastewater for awhile, you know that regulations, best practices, and technologies are always evolving. By developing an ongoing training plan, you can ensure that all employees are apprised of the details of your system and kept abreast of changes to regulations and best practices.

Consider also the value of enabling new employees to learn the ropes from experienced hands. Have seasoned employees who have had to respond to anomalous events document this useful information, in addition to normal operation policies and procedures. With comprehensive and reasonably frequent training, you can achieve consistent employee response,

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***An ounce of prevention  
is worth a pound of cure***

■ ■ ■  
***Training is your ounce  
of prevention!***

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and the lessons learned in the past will become part of your organization's knowledge base, to be shared by all.

### **Keep a training record**

Keep a record of training activities, noting the topics you have covered. Ask yourself if any important topics are missing. In addition to training your staff on the operation of the treatment system, here are a few topics that your employees should know from your training program:

### **pH system maintenance**

- Is the strip chart labeled with the date and time each day? Is it recording continuously?
- Are the probe calibrations and cleanings documented? Is this documentation readily available for inspection?
- Do employees know that any pH excursions must be reported to your Inspector within 24 hours from the time you become aware of them, and how to report them?

### **Self Monitoring Report (SMR)**

- Are the submitted SMRs complete and accurate?
- Are the methods cited by the lab approved by 40 CFR 136?
- Are the Quality Control (QC) and Chain of Custody (COC) sheets included?

### **Wash water best management practices**

- Do employees know how to handle all forms of wash water?
- Are best management practices used in the waste storage area? (*See the article on page 2.*)

### Resources for Your Training:

- Call your Inspector for ideas on specialized training topics.
- Invite your Inspector to field questions during your training.
- Get a pH poster and factsheet from your Inspector.
- Obtain an SMR factsheet and quick reference guide from your Inspector or online at [www.sanjoseca.gov/esd/wastewater/discharger-forms.asp](http://www.sanjoseca.gov/esd/wastewater/discharger-forms.asp).

### Permit requirements

- Does your permit require:
    - Periodic calibration of flow meters?
    - Inclusion of flow meter readings in your SMR?
    - A separate SMR cover sheet for each sample point?
- Remember, your wastewater discharge permit is customized for your company. By emphasizing your unique requirements in your training program, employees will better

understand the steps that are necessary to meet wastewater permit requirements. As one of the most knowledgeable resources available to you, your Inspector is available to assist with or participate in any training for your staff involving your permit and requirements. Additionally, materials such as pH posters, pH and SMR factsheets, and SMR quick reference guides are available for use during your training. Copies are available from your Inspector.

The investment of an ounce or two of time and resources in training will help prevent “a pound” of serious problems that could result from an employee’s misunderstanding or lack of knowledge. ➤



## Review Analytical Lab Reports the Easy Way

There is nothing more frustrating for an Industrial User (IU) than to receive a violation because of an error the laboratory made in its sample analysis or paperwork. Unfortunately, the frequency of these paperwork violations has increased this past year.

**Review your lab reports immediately — any violation must be reported to your Inspector within 24 hours of becoming aware of it.**

Whether you are collecting samples for your regular self-monitoring report, re-sampling after a violation, following up with a required action from a compliance meeting, or monitoring internally, you can expect an analytical report back from your laboratory. It is your responsibility to provide clear instructions to your laboratory about how you would like your samples handled, and you must also double-check the lab’s work to ensure the validity of your sample results. Reviewing and interpreting this report may be a challenge because it contains not only sample results, but additional information such as the Quality Assurance/ Quality Control (QA/QC) and Chain of Custody (COC) that must be reviewed just as carefully.

### This checklist below will help you conduct an efficient step-by-step review:

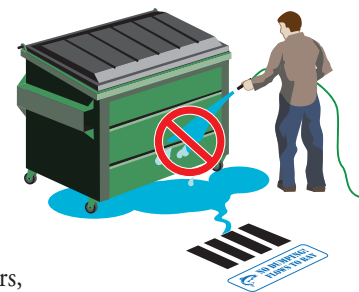
- ✓ Is the laboratory certified by the California Department of Health Services?
- ✓ Did the laboratory perform testing in accordance with 40 CFR 136 approved methods?
  - ▶ Clearly indicate on your COC that you would like your samples analyzed using wastewater methods. For your reference, a complete list of acceptable methods can be found at [www.epa.gov/region09/qa/pdfs/40cfr136\\_03.pdf](http://www.epa.gov/region09/qa/pdfs/40cfr136_03.pdf).
- ✓ Does the Sample Receiving Checklist indicate any non-compliance issues or discrepancies on the COC?
- ✓ Did the laboratory analyze for all the pollutants indicated on the COC?
- ✓ Were samples analyzed within holding time?
- ✓ Is the laboratory’s QA/QC acceptable?
- ✓ Were all the results below both local and federal limits in your permit?
  - ▶ If the laboratory report indicates a violation, you must notify your Inspector within 24 hours from the time you become aware of it. ➤

## Keep the Bay Clean: Watch Your Waste Storage Area

You may not know it, but your company’s waste storage area can be a source of harmful substances to our creeks and Bay. Oils, grease, sediment, trash, and other pollutants spilled from dumpsters and compactors, or loose in the waste storage area, can be conveyed by rainwater or wash water to the storm drain — then carried to the nearest creek *without treatment*.

Allowing anything other than clean rainwater down a storm drain violates local, state, and federal regulations and may result in an administrative citation with a fine. You can prevent this by training your employees on how to best handle wash water and maintain waste storage areas, including:

- Direct all wash water into the sanitary sewer when hosing down dumpsters,



Continued on next page

compactors, tallow bins, or enclosure areas, not to the street gutter or stormdrain. Sweep first, then use a mop and bucket and dispose of the wash water in a sink or plumbed drain. If you are cleaning areas such as a chemical storage section, this wash water may need to be discharged to your acid waste neutralization system. Check with your Inspector to confirm how this water should be handled.

- Assemble and keep available a spill kit (broom, dust pan, garbage bags, and absorbents such as rags, paper towels, kitty litter, etc.).



Train staff to use the spill kit immediately if a leak or spill occurs. Loose absorbent should be swept up and disposed of after use and not left to sit overnight or in the rain.

- Never dispose of liquid waste directly into a dumpster or compactor. Mix wet waste with absorbent material, then double-bag for disposal. Keep the lids on all disposal

bins closed to repel rainwater and prevent litter from escaping. If you have leaking or damaged bins, call your hauler to have them replaced.



For more information visit [www.sanjoseca.gov/esd/stormwater](http://www.sanjoseca.gov/esd/stormwater) or call Watershed Protection at (408) 945-3000. If you are located outside of San José, contact your local stormwater agency. A poster on Managing Your Waste Storage Area with these Best Management Practices and more is available. Please contact your Inspector if you would like to receive a copy. 🐾

## Ask Your Inspector

**Q:** What do I do with the lab sample results sent to me by the San Jose/Santa Clara Water Pollution Control Plant?

**A:** The Plant is required to routinely sample the wastewater of permitted Industrial Users (IUs) to determine compliance with Industrial Wastewater Discharge Permits. Our Inspectors collect the samples and submit them to the Plant Laboratory for analysis. The Laboratory runs the analyses and then returns the analytical data reports to the appropriate Inspector. In turn, the Inspectors review and compare the results with each IU's permit limits, and note any needed enforcement action. The Inspectors mail copies of the analytical data to the IUs. A sample analytical result that is out of compliance is referred to the Enforcement Coordinator with a recommendation for appropriate action per the Enforcement Response Plan.

Federal regulations require IUs to keep all analytical results onsite and available for review for three years. It is always a good idea to review sample results, even if they are in compliance, to see how your facility is performing. The Plant's laboratory results are also useful for comparing your laboratory's format and data. If you don't understand the results or have questions, your Environmental Inspector is available to review the report with you. 🐾

Do you have a question? Submit it for future publication consideration to [tributary.tribune@sanjoseca.gov](mailto:tributary.tribune@sanjoseca.gov).

## Watershed Workforce

### Jack Judkins



Jack Judkins has been a City of San José Environmental Inspector since 1990. His duties include inspecting, sampling, and enforcing permitted industrial wastewater dischargers and food service facilities, as well as conducting construction site stormwater inspections. Prior to his current position, Jack served as a Laboratory Technician in the Plant Laboratory, where he analyzed plant process samples and industrial wastewater samples. He holds a B.A. in Biological Science and Chemistry from Chico State University and an A.S. in Administration of Justice from West Valley College. Jack leads by example, doing his part to help the environment by conserving natural resources, using public transportation daily, and encouraging others to do the same. 🐾

## 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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### Get Recognized!

#### Is your company an outstanding practitioner of protecting creeks and the Bay?

The California Water Environment Association (CWEA) wants to recognize you! Each year, CWEA selects a company that has been outstanding in protecting the water environment with its Industry of the Year Award, presented at the Pretreatment, Pollution Prevention, and Stormwater (P3S) Conference.

Industrial dischargers who are taking proactive steps to meet current environmental protection standards and regulations are eligible for the award. To be nominated, businesses should meet these general criteria:

- Permitted by San Jose/Santa Clara Water Pollution Control Plant.
- Implemented waste minimization/recycling or other source reduction measures.
- Applied an innovative solution and/or technical advance to a waste management problem.

- Wrote operation and preventative maintenance practices that are clearly defined to improve environmental performance.
- Demonstrated a consistent record of meeting or exceeding industrial wastewater discharge requirements (e.g., operating without violations and/or citation-free for at least 12 months).
- Conducted one or more active community service programs to develop public awareness for industrial wastewater control and environmental protection.

If you would like to participate in this award program, please ask your Environmental Inspector if you qualify and for more information. We welcome your interest in learning more about this program! 🐾



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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