

Surveillance Monitoring Fact Sheet

Overview

- Surveillance monitoring protects the Wastewater Facility, workers, and Bay
- Businesses do not receive notice and monitoring can occur at anytime
- Violations are issued for noncompliant surveillance sample results
- Prevent violations through careful in-house monitoring and proper training

What is Surveillance Monitoring?

Surveillance monitoring is an ongoing discrete monitoring program that evaluates pollutants found within the sanitary sewer.

Why Conduct Surveillance Monitoring?

In order to fulfill the federal requirements at 40 CFR 403.8(f)(2)(v) the City conducts surveillance monitoring throughout the service area to identify occasional or continuing noncompliance with pretreatment standards. The City of San José Pretreatment Program is responsible for the following:

- Protecting the South San Francisco Bay from “pass-through” of toxic chemicals, heavy metals, and other pollutants of concern;
- Protecting the health and safety of the public and workers;
- Protecting operations at the San José-Santa Clara Regional Wastewater Facility (Wastewater Facility) and the sanitary sewer collection system; and
- Ensuring compliance with state and federal pretreatment regulations.

How We Conduct Surveillance Monitoring

Automatic composite samplers are installed in the sewer downstream of the selected businesses. Collected samples are analyzed for concentrations of target pollutants by the City of San José’s certified laboratory. Evidence of bypass and illegal dumping are also monitored through cleanout access points, dye tests, and on-site inspection. Sample results and other evidence collected during the surveillance monitoring are used to determine violations and potential enforcement.



Environmental Services

www.sanjoseca.gov/pretreatment

The San José-Santa Clara Regional Wastewater Facility serves the cities of San José, Santa Clara, Milpitas, Cupertino Sanitary District, West Valley Sanitation District (including Campbell, Los Gatos, Monte Sereno, and Saratoga), County Sanitation Districts 2-3, and Burbank Sanitary District.

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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 (TTY).

How Businesses are Identified

Businesses selected for surveillance monitoring do not receive notice and monitoring can be conducted at any time. Businesses are identified for surveillance through the following criteria:

- Potential to discharge pollutants that could pass through or interfere with the Wastewater Facility or may cause it to be in violation of its National Pollution Discharge Elimination System (NPDES) discharge limits,
- Compliance history,
- Inadequate pretreatment system technology,
- Complaints of illegal discharge(s),
- On-site indicators of dumping or bypass, and/or
- Referrals from other agencies or City departments.

Enforcement of Violations

If bypass or illegal discharge activity is confirmed, Pretreatment Program inspectors will follow up with enforcement actions which could include warning notices, notices of violation, monetary fines, legal action, and/or termination of service. Depending on the magnitude of the violation, the findings may be referred to the City Attorney or District Attorney's offices for prosecution.

Prevent Violations at Your Business

Dischargers who actively train staff and monitor operations are less likely to have violations. Below is a partial list of causes and preventive measures to avoid potential surveillance monitoring violations and may not apply to all sites:

- **Proactively monitor**— Sample when treatment system effectiveness may be compromised, such as during start-up, shut-down, meal breaks, shift changes, before/after filters are changed or clarifier sludge is pumped down, and at times of peak production loading.
- **Ensure QA/QC**— Check in-house sample test results against certified lab results. Do this multiple times. If there isn't a clear relationship between the data sets, be cautious in relying on in-house testing.
- **Perform preventative maintenance**— Schedule and document routine preventative maintenance on pretreatment equipment.
- **Verify waste piping is plumbed correctly**— Undetected plumbing errors or leaks can lead to violations. Consider dye testing or having a plumber check with a remote camera if plumbing cannot be verified.
- **Train employees**— Periodically train and quiz staff on standard operating procedures. For example, custodial staff can cause a violation by discharging spill cleanup water to a sink that bypasses treatment.