Guidelines for Discharging Industrial Wastewater

Working together to protect public health and the environment
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Introduction

The purpose of this guide is to help businesses with questions about discharging industrial wastewater (wastewater from a nonresidential source) into the sewer. It provides information on permits, fees, inspections, monitoring and enforcement activities.

Our Mission

Central Contra Costa Sanitary District (Central San) is a special district that was formed in 1946. We serve more than 490,000 residents and businesses, collecting and treating an average of 34 million gallons of wastewater per day.

Our mission is to protect public health and the environment through safe and effective wastewater collection, treatment and disposal.

Our treatment plant is designed to treat conventional pollutants, including biochemical oxygen demand (BOD) (biological pollutants), total suspended solids (TSS), fecal coliform, pH, oil and grease. Most of the wastewater is residential. Industrial and commercial nonconventional pollutants, including metals, chemicals, medical waste, and other types of pollutants, may only be incidentally removed or treated at our plant. In some cases, these pollutants can upset the treatment plant operations. Therefore, our goal is to prevent those pollutants from entering the wastewater in harmful quantities. To help us accomplish that goal and our overall mission, our Environmental Compliance staff monitors, regulates, and controls industrial wastewater discharges to our collection system and treatment plant.

Our primary method of controlling pollutants at the source is to identify businesses with the greatest likelihood of discharging toxic materials or other contaminants (such as grease) that can cause problems to our operations. Our Environmental Compliance staff then inspects those businesses to determine whether they must obtain a wastewater discharge permit, and if so, works with the business to ensure compliance with that permit.

By working in partnership with local businesses to control pollutants at the source, we can treat the wastewater and protect the water environment from the adverse effects of toxic wastes in a more
efficient and cost-effective manner, thus maintaining the most reasonable rates for our customers.

**Regulatory Requirements**

Central San must operate in compliance with federal, state, and local regulations.

Our treatment plant is subject to strict requirements established by the U.S. Environmental Protection Agency. We must comply with those federal requirements as well as state and local regulations, all of which are incorporated into our National Pollutant Discharge Elimination System permit issued by the San Francisco Bay Regional Water Quality Control Board. In order to comply with the requirements of this permit, Central San is required to regulate businesses and industries discharging to the sewer system.

The federal Clean Water Act requires states to operate approved pretreatment programs that control industrial waste at the source—before it enters streams, lakes, and bays through wastewater treatment plants. The state delegates this federal mandate and authority to local wastewater treatment plants like Central San. This delegation authorizes us to regulate wastewater discharges and enforce federal regulations within our service area. An important part of this program is to issue certain types of businesses an Industrial User Wastewater Discharge Permit (IU Permit).

**Your Incentive**

Understanding and complying with industrial wastewater regulations and permit requirements makes good business sense. You’ll not only help to significantly reduce the risk of pollution and harm to our water environment, you’ll also avoid violations and potential penalties.

You may even save money by following Best Management Practices recommended by our Environmental Compliance team.

Taking a proactive approach to complying with programs to protect water quality is good for the environment, your customers, and your business.
Who Needs A Permit?

Not all businesses discharging wastewater to the sewer system are required to obtain an IU Permit.

Our Environmental Compliance staff evaluates each business on an individual basis to determine if a permit is necessary. Several factors are considered, including the type and volume of wastewater being discharged, and whether or not the facility is subject to any federal categorical regulations.

Central San issues a permit to a business based on either the results of an inspection (also known as an Industrial User Survey), or the potential for that business to discharge a pollutant for which there are federal or local limits. In some cases, federal regulations mandate that we issue permits to particular types of businesses.

Categorical Industrial Users

Categorical Industrial Users are businesses that engage in certain types of operations that are subject to federal discharge limitations developed by the Environmental Protection Agency. Examples include (but are not limited to) pharmaceutical manufacturers, plating shops, circuit-board manufacturers, and bulk transportation equipment cleaners.

All Categorical Industrial Users are required to obtain a permit and are subject to both self-monitoring and monitoring by the Environmental Compliance staff.

Significant Non-Categorical Industrial Users

Significant Non-Categorical Industrial Users have more stringent requirements than other types of businesses. They typically discharge high volumes of wastewater, produce pollutants that have the potential to adversely affect operations of our treatment plant, and are subject to federal as well as local pretreatment standards and discharge limits.

Examples of Significant Non-Categorical Industrial Users include (but are not limited to) hospitals, fleet operations, and colleges.

All Significant Non-Categorical Industrial Users are required to obtain a permit and are subject to both self-monitoring and monitoring by the Environmental Compliance staff.
Non-Significant Industrial Users

Non-Significant Industrial Users are businesses that could possibly discharge certain types of pollutants (such as hazardous wastes, metals or toxic organics) to the sewer system.

Examples include (but are not limited to) automotive repair and maintenance shops, laboratories, medical and dental offices, groundwater dischargers from leaking underground storage tanks and restaurants.

They are subject to Central San local discharge limits, which are periodically evaluated by state and federal authorities to ensure adequate protection of our treatment operations. To comply with our own permit requirements, Central San has established local limits for specific pollutants coming into the treatment plant, such as copper, lead, mercury and cyanide.

Local Industrial Users may be required to obtain a permit, depending on their potential to discharge hazardous wastes or elevated levels of pollutants. They may be required to do self-monitoring.
How to Obtain A Permit

To obtain an IU Permit, you must submit a completed application to Central San. Application forms are available on our web site, centralsan.org.

It may take Central San several weeks to process the application, conduct an industrial user survey and/or inspection, and issue the permit. Businesses should allow themselves 30 days to read, sign and return the permit to Central San before it goes into effect.

First-time permits are issued for one year. Permit renewals are issued for one to four years, depending on the site-specific conditions.

Industrial wastewater permits are not transferable. Whenever a change in ownership of a business occurs, the new company must obtain a new permit.
Central San issues different classifications of permits based on the type and volume of wastewater a business discharges. The permit defines a business’s responsibilities and obligations when discharging process wastewater to the sewer system. Businesses issued a discharge permit by Central San may be required to periodically sample and monitor their wastewater and submit reports to our Environmental Compliance staff.

**Class I & II Industrial User Permits**

Central San issues Class I or II permits to businesses which require a high level of oversight. These businesses can be grouped as Categorical Industrial Users and Significant Non-Categorical Industrial Users.

Class I permits are formatted as permit contracts that need to be customized to a business’s operation and discharge practices and that contain site-specific requirements (such as additional discharge limits or special billing criteria).

Class II permits specify sampling and analysis of process discharge and may require continuous monitoring for flow, pH levels, or other conditions.

**Class III Industrial User Permits**

Central San issues Class III permits to Non-Significant Industrial Users that may use sampling or continuous monitoring devices to control discharge quality. Class III permits can also be used to require businesses to employ Best Management Practices to control pollutants in their wastewater.

Certain types of businesses are issued Class III zero-discharge permits. These permits require businesses to maintain and submit records certifying that high-risk pollutants are not discharged to the sewer system.

In general, Class III permits do not require the same level of regulatory oversight as Class I or II permits.
Special Discharge Permits

Central San issues Special Discharge Permits to businesses that have a temporary, non-standard wastewater discharge to the sewer system. In many cases, this permit authorizes the discharge at a specific location. As an example, groundwater remediation discharge or dewatering operations at a construction site. Special Discharge Permits may require the use of a pretreatment system and/or the sampling/analysis of the wastewater, depending on the site conditions.
Fees

Central San collects fees to recover costs associated with the Environmental Compliance permit program. Examples of fees are:

- Class I permits are billed for actual costs associated with administering the permit
- Class II Permit annual fee: Standard fee plus the cost of sampling/analytical work for each event
- Class III Permit: No annual fee
- Special Discharge Permit fee (application fee includes minimum level of oversight depending on the permit)

Additional information about current fees can be found online at centralsan.org or by calling (925) 229-7288.
Certain permit requirements must be met by businesses to ensure compliance with Title 10 of the District Code (available at centralsan.org) and the National Pretreatment Standards set forth in the Code of Federal Regulations (CFR), Title 40 (Protection of Environment), Part 403 (General Pretreatment Regulations for Existing and New Sources of Pollution).

All permits issued by Central San require some level of documentation and reporting of compliance status to our Environmental Compliance staff. If these reports are late, incorrect or incomplete, the business may be subject to an enforcement action.

Additional permit requirements typically include sampling for specified pollutants, maintaining operation and maintenance logs, meeting compliance milestones and submitting reports by specific deadlines. The permit itself will specify what is required.

**Best Management Practices/Source Reduction**

A business may be required to establish and follow Best Management Practices, or encouraged to initiate a program of continuous improvement to reduce pollutants in its discharges. Activities might include material and product substitutions, process or equipment changes, operational improvements, housekeeping improvements, administrative procedure improvements, and/or employee education and training in pollution prevention.

**Administrative Controls**

A business may be required to maintain written logs pertaining to those operation and maintenance activities that may affect wastewater discharges. For example: source and volume of all batch discharges, calibration and maintenance performed on pretreatment and monitoring equipment.
**Pretreatment Equipment**

A business may be required to install, operate and maintain pretreatment equipment (such as oil/water separator device, silver recovery, pH neutralization, filtration, amalgam separator) in order to meet the terms of their permit. The business would also need to develop, implement and follow Standard Operating Procedures for the pretreatment equipment.

**Sampling/Monitoring**

If a permit requires wastewater sampling, then appropriate sampling methods and use of laboratories certified in wastewater analyses will be necessary. The business may also need to install, maintain and operate monitoring equipment (such as flow meters, pH meters, and/or combustible gas detectors).

**Reporting**

A business will be required to submit periodic compliance reports and/or documents by specific deadlines. These reports may require inclusion of discharge analysis data, flow meter and pH recorder charts, operation and maintenance logs, receipts for off-hauling or recycling of wastes, etc. Reporting forms are available online at centralsan.org.

**Compliance Schedule**

A business may be required to complete milestones indicated on a compliance schedule. Examples of milestones might include submittal of spill prevention/response plans, installation of pretreatment and/or monitoring equipment, and installation of a sampling structure.

Additional information about permit requirements can be found online at centralsan.org.
The Environmental Compliance Staff conducts inspections of permitted facilities, typically annually, to ensure businesses are complying with their permit requirements. Environmental Compliance staff will periodically conduct unannounced sampling events to obtain data on the process wastewater being discharged.

Environmental Compliance staff may also conduct unannounced inspections.

Typically, the inspector will do the following:

• Tour the facility both inside and out

• Note production processes, operational and maintenance activities

• Look at sewer inlets, pretreatment equipment, chemicals, materials, waste storage areas, etc.

• Collect samples

• Review facility records

• Discuss the inspection findings with the facility manager

If violations are noted during the inspection, enforcement actions may follow.
Enforcement

Businesses that do not comply with the Source Control Ordinance or permit requirements may be issued enforcement documents by Central San inspectors. These enforcement documents include:

- Required Information Form: used to obtain copies of records and other information about the business’s practices and production that could not be provided during the inspection.

- Referral Notice: used to notify the business and regulatory agencies (such as the Health Department or Fire Department) when problems outside of the scope of our program are observed.

- Warning Notice: issued for a minor violation (or a condition that, if uncorrected, could result in a violation).

- Notice of Violation: issued for violations, or for failure to respond to a Warning Notice.

Businesses that fail to respond to enforcement documents or citations may face escalated enforcement actions such as fines and/or a Cease and Desist Order. These actions represent formal enforcement against businesses that are taken when a pattern of noncompliance develops, or when significant or egregious violations occur.

For certain significant noncompliance violations that meet established criteria found in federal regulations, Central San is required to include specified information in reports filed with regional and federal authorities. Central San is also required to publish information about the business’s violations in the local newspaper.
The following table summarizes the major types of significant noncompliance violations:

<table>
<thead>
<tr>
<th>Violation</th>
<th>Enforcement Action</th>
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</thead>
<tbody>
<tr>
<td>Failure to meet a Compliance Schedule deadline</td>
<td>Notice of Violation issued; reported to regional/federal authorities &amp; published in the newspaper if more than 90 days late</td>
</tr>
<tr>
<td>Failure to meet Periodic Compliance Report deadline</td>
<td>Notice of Violation issued; reported to regional/federal authorities; published in newspaper if more than 45 days late</td>
</tr>
<tr>
<td>Errors, omissions, or violations of discharge limits during Sampling</td>
<td>Notice of Violation issued; resampling within 30 days; reported to regional/federal authorities; published if omission is intentional or significant</td>
</tr>
<tr>
<td>Exceeding pollutant limit by a set multiplier in 33% or more of samples taken in last two quarters</td>
<td>Notice of Violation issued; reported to regional/federal authorities; published in newspaper</td>
</tr>
<tr>
<td>Exceeding pollutant limit in 66% or more of samples taken in last two quarters</td>
<td>Notice of Violation issued; reported to regional/federal authorities; published in newspaper</td>
</tr>
<tr>
<td>Failure to accurately report Noncompliance</td>
<td>Notice of Violation issued; Reported to regional/federal authorities; published in newspaper</td>
</tr>
</tbody>
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Information about enforcement actions can be found online at centralsan.org.
Help Is Available

Additional information about Central San's industrial wastewater discharge permits, can be found at our web site: centralsan.org.

Resources for More Information

Central San Environmental Compliance Section
(925) 229-7288
centralsan.org

Contra Costa Clean Water Program
(925) 313-2360
cccleanwater.org

Green Business Program
(925) 665-3200
greenbusinessca.org

Contra Costa Hazardous Material Program
(925) 665-3200
cchealth.org/hazmat/
Our mission is to protect public health and the environment. We do this by collecting and treating wastewater, providing high-quality recycled water, and promoting pollution prevention.

Our treatment plant in Martinez collects and treats an average of 34 million gallons of wastewater every day. Some highly treated wastewater is recycled for irrigation use on golf courses and parks, and the rest is safely released into Suisun Bay. We also operate a Household Hazardous Waste Collection Facility that allows our customers to safely dispose of hazardous materials.

The Household Hazardous Waste Collection Facility offers services to eligible small businesses. Call (800) 646-1431 for information on eligibility, fees, and how the appointment system works.