

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION**

ORDER NO. 01-059

**AMENDING NPDES PERMITS FOR THE SEVENTEEN DISCHARGERS CITED:**

Dublin San Ramon Services District, Fairfield-Suisun Sewer District, City of Hayward, City of Livermore, Napa Sanitation District, Novato Sanitary District, Oro Loma/Castro Valley Sanitary District, City of Palo Alto, City of Petaluma, City and County of San Francisco (Oceanside Treatment Facility), Cities of San Jose and Santa Clara, City of San Leandro, South Bayside System Authority, Cities of South San Francisco and San Bruno, City of Sunnyvale, Union Sanitary District, and Vallejo Sanitation and Flood Control District

**FINDINGS**

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board), finds that:

1. The Publicly Owned Treatment Works (POTWs) listed below (hereinafter the Dischargers) have been previously issued National Pollutant Discharge Elimination System (NPDES) Permits in Board Orders given below:

<u>DISCHARGER</u>	<u>NPDES PERMIT NO.</u>	<u>ORDER NO.</u>	<u>DATE ADOPTED</u>
Dublin San Ramon Services District	CA0037613	00-088	8-16-00
Fairfield-Suisun Sewer District	CA0038024	98-077	7-15-98
Hayward, City of	CA0037869	00-087	8-16-00
Livermore, City of	CA0038008	00-089	8-16-00
Napa Sanitation District	CA0037575	00-059	7-19-00
Novato Sanitary District	CA0037958	99-036	5-25-99
Oro Loma/Castro Valley Sanitary District	CA0037869	00-087	8-16-00
Palo Alto, City of	CA0037834	98-054	6-17-98
Petaluma, City of	CA0037810	98-076	7-15-98
San Francisco, City and County of: Oceanside Treatment Facility	CA0037681	97-044	3-19-97
San Jose and Santa Clara, Cities of	CA0037842	98-052	6-17-98
San Leandro, City of	CA0037869	00-087	8-16-00
South Bayside System Authority	CA0038369	01-012	1-24-01
Cities of South San Francisco and San Bruno	CA0038130	97-086	7-16-97
Sunnyvale, City of	CA0037621	98-053	6-17-98
Union Sanitary District	CA0037869	00-087	8-16-00
Vallejo Sanitation and Flood Control District	CA0037699	00-026	4-19-00

2. The United States Environmental Protection Agency (EPA) has promulgated regulations requiring POTWs that meet certain criteria to develop and implement local pretreatment programs. These criteria are as follows:

- POTWs with total design flows greater than five million gallons per day (MGD) and receive from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW;
  - POTWs with smaller flows (5 MGD or less) which receive industrial waste which may interfere with treatment processes, contaminate sludge, cause violation of effluent limitations, or other circumstances which may cause Interference with the POTW or cause Pass Through of pollutants or cause POTW upsets.
3. The EPA formally delegated the Pretreatment Program to the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards on September 22, 1989. As of September 22, 1989, the Board is the Approval Authority and is responsible for the review and approval of new and modified POTW Pretreatment Programs.
  4. The Board adopted Order No. 95-015 on January 18, 1995. The Order required the cited POTWs to implement pretreatment programs in accordance with 40 Code of Federal Regulations (CFR) Part 403.
  5. The Sewerage Agency of Southern Marin (SASM) had been determined to not meet the criteria of having to implement a local pretreatment program and was removed and deleted from having to maintain an approved pretreatment program in 1989. This Order continues to find that the SASM is not required to implement an approved pretreatment program.
  6. The North San Mateo County Sanitation District (NSMCSD) had been determined to not meet the criteria of having to implement a local pretreatment program and was removed and deleted from having to maintain an approved pretreatment program in 1995. This Order continues to find that the NSMCSD is not required to implement an approved pretreatment program.
  7. The federal pretreatment program regulates certain industrial users that are deemed "significant" by each of the Dischargers. However, there are many other sources of pollutants that are discharged to the sanitary sewers that are not classified as significant industrial users. These sources, mainly residential and commercial, can be regulated by the Dischargers' pollution prevention programs. Therefore, the Regional Board encourages the further development and implementation of the Dischargers' pollution prevention programs and/or pollutant minimization programs that will enhance the ability to reduce the amount of pollutants that enter the sanitary sewers and eventually San Francisco Bay.
  8. The Board has notified the Dischargers and interested agencies and persons of its intent to amend the NPDES Permits and has provided them with an opportunity for a public hearing and to submit their written views and recommendations.
  9. This Order is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code [California Environmental Quality Act (CEQA)] pursuant to Section 13389 of the California Water Code.

10. The Board, in a public meeting, heard and considered all comments pertaining to the discharges.

IT IS HEREBY ORDERED, in order to meet the provisions of Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, that the Dischargers shall comply with the following:

1. The Dischargers shall implement all pretreatment requirements contained in 40 CFR 403, as amended. The Dischargers shall be subject to enforcement actions, penalties, and fines as provided in the Clean Water Act (33 USC 1351 *et seq.*), as amended. The Dischargers shall implement and enforce their respective Approved Pretreatment Programs or modified Pretreatment Programs as directed by the Board's Executive Officer or the EPA. The EPA and/or the State may initiate enforcement action against an industrial user for noncompliance with applicable standards and requirements as provided in the Clean Water Act.
2. The Dischargers shall enforce the requirements promulgated under Sections 307(b), 307(c), 307(d) and 402(b) of the Clean Water Act. The Dischargers shall cause industrial users subject to Federal Categorical Standards to achieve compliance no later than the date specified in those requirements or, in the case of a new industrial user, upon commencement of the discharge.
3. The Dischargers shall perform the pretreatment functions as required in 40 CFR Part 403 and amendments or modifications thereto including, but not limited to:
  - 1) Implement the necessary legal authorities to fully implement the pretreatment regulations as provided in 40 CFR 403.8(f)(1);
  - 2) Implement the programmatic functions as provided in 40 CFR 403.8(f)(2);
  - 3) Publish an annual list of industrial users in significant noncompliance as provided per 40 CFR 403.8(f)(2)(vii);
  - 4) Provide for the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR 403.8(f)(3); and
  - 5) Enforce the national pretreatment standards for prohibited discharges and categorical standards as provided in 40 CFR 403.5 and 403.6, respectively.
4. The Dischargers shall submit annually a report to the EPA Region 9, the State Board and the Regional Board describing the Dischargers' respective pretreatment program activities over the previous twelve months. In the event that the Discharger is not in compliance with any conditions or requirements of this permit, the Discharger shall also include the reasons for noncompliance and a plan and schedule for achieving compliance. The report shall contain, but is not limited to, the information specified in Appendix A entitled, "Requirements for Pretreatment Annual Reports," which is made a part of this Order. The annual report is due on the last day of February each year. The Executive Officer may specify another due date on a case by case basis.

5. The Dischargers shall submit semiannual pretreatment reports to the EPA Region 9, the State Board and the Board describing the status of their respective significant industrial users (SIUs). The report shall contain, but is not limited to, the information specified in Appendix B entitled, "Requirements for Semiannual Pretreatment Reports," which is made part of this Order. The semiannual reports are due July 31<sup>st</sup> (for the period January through June) and January 31<sup>st</sup> (for the period July through December) of each year. The Executive Officer may exempt a Discharger from the semiannual reporting requirements on a case by case basis subject to State Board and EPA's comment and approval.
6. The Dischargers may combine the annual pretreatment report as required in Provision 4 with the semiannual pretreatment report (for the July through December reporting period) as required in Provision 5. The combined report shall contain all of the information requested in Appendices A and B and will be due on January 31<sup>st</sup> of each year.
7. The Dischargers shall conduct the monitoring of their respective treatment plants' influent, effluent, and sludge as described in Appendix C entitled, "Requirements for Influent, Effluent and Sludge Monitoring," which is made part of this Order. The results of the sampling and analysis, along with a discussion of any trends, shall be submitted in the semiannual reports. A tabulation of the data shall be included in the annual report. The Executive Officer may require more or less frequent monitoring on a case by case basis.
8. Order No. 95-015 is hereby rescinded.
9. This Order shall serve to amend the National Pollutant Elimination System Permits listed above pursuant to Section 402 of the Clean Water Act, or amendments thereto, and shall become effective ten days after the date of adoption provided the Regional Administrator of the United States Environmental Protection Agency has no objection. If the Regional Administrator objects to its issuance, this Order shall not become effective until such objection is withdrawn.
10. This Order expires as it applies to each of the Dischargers named herein on the date that the individual discharger's NPDES permit expires.

I, Loretta K. Barsamian, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on June 19, 2001.



Loretta K. Barsamian  
Executive Officer

Appendices:

- A. Requirements for Annual Pretreatment Reports
- B. Requirements for Semiannual Pretreatment Reports
- C. Requirements for Influent, Effluent and Sludge Monitoring

## APPENDIX A

### REQUIREMENTS FOR PRETREATMENT ANNUAL REPORTS

The Pretreatment Annual Report is due each year on the last day of February. [If the annual report is combined with the semiannual report (for the July through December period) the submittal deadline is January 31<sup>st</sup> of each year.] The purpose of the Annual Report is 1) to describe the status of the Publicly Owned Treatment Works (POTW) pretreatment program and 2) to report on the effectiveness of the program, as determined by comparing the results of the preceding year's program implementation. The report shall contain at a minimum, but is not limited to, the following information:

#### 1) **Cover Sheet**

The cover sheet must contain the name(s) and National Pollutant Discharge Elimination Discharge System (NPDES) permit number(s) of those POTWs that are part of the Pretreatment Program. Additionally, the cover sheet must include: the name, address and telephone number of a pretreatment contact person; the period covered in the report; a statement of truthfulness; and the dated signature of a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the POTW (40 CFR 403.12(j)).

#### 2) **Introduction**

The Introduction shall include any pertinent background information related to the District/City, the POTW and/or the Industrial base of the area. Also, this section shall include an update on the status of any Pretreatment Compliance Inspection (PCI) tasks, Pretreatment Performance Evaluation tasks, Pretreatment Compliance Audit (PCA) tasks, Cleanup and Abatement Order (CAO) tasks, or other pretreatment-related enforcement actions required by the Regional Board or the EPA. A more specific discussion shall be included in the section entitled, "Program Changes."

#### 3) **Definitions**

This section shall contain a list of key terms and their definitions that the POTW uses to describe or characterize elements of its pretreatment program.

#### 4) **Discussion of Upset, Interference and Pass Through**

This section shall include a discussion of Upset, Interference or Pass Through incidents, if any, at the POTW(s) that the Discharger knows of or suspects were caused by industrial discharges. Each incident shall be described, at a minimum, consisting of the following information:

- a) a description of what occurred;
- b) a description of what was done to identify the source;
- c) the name and address of the IU responsible
- d) the reason(s) why the incident occurred;
- e) a description of the corrective actions taken; and
- f) an examination of the local and federal discharge limits and requirements for the purposes of determining whether any additional limits or changes to existing

requirements may be necessary to prevent other Upset, Interference or Pass Through incidents.

**5) Influent, Effluent and Sludge Monitoring Results**

This section shall provide a summary of the analytical results from the "Influent, Effluent and Sludge Monitoring" as specified in Appendix C. The results should be reported in a summary matrix that lists monthly influent and effluent metal results for the reporting year.

A graphical representation of the influent and effluent metal monitoring data for the past five years shall also be provided with a discussion of any trends.

**6) Inspection and Sampling Program**

This section shall contain at a minimum, but is not limited to, the following information:

- a) Inspections: the number of inspections performed for each type of IU; the criteria for determining the frequency of inspections; the inspection format procedures;
- b) Sampling Events: the number of sampling events performed for each type of IU; the criteria for determining the frequency of sampling; the chain of custody procedures.

**7) Enforcement Procedures**

This section shall provide information as to when the approved Enforcement Response Plan (ERP) had been formally adopted or last revised. In addition, the date the finalized ERP was submitted to the Regional Board shall also be given.

**8) Federal Categories**

This section shall contain a list of all of the federal categories that apply to the POTW. The specific category shall be listed including the subpart and 40 CFR section that applies. The maximum and average limits for the each category shall be provided. This list shall indicate the number of Categorical Industrial Users (CIUs) per category and the CIUs that are being regulated pursuant to the category. The information and data used to determine the limits for those CIUs for which a combined waste stream formula is applied shall also be provided.

**9) Local Standards**

This section shall include a table presenting the local limits.

**10) Updated List of Regulated SIUs**

This section shall contain a complete and updated list of the Discharger's Significant Industrial Users (SIUs), including their names, addresses, and the reason why the SIU is classified as "significant." The list shall include all deletions and additions keyed to the list as submitted in the previous annual report. All deletions shall be briefly explained.

11) **Compliance Activities**

- a) **Inspection and Sampling Summary:** This section shall contain a summary of all the inspections and sampling activities conducted by the Discharger over the past year to gather information and data regarding the SIUs. The summary shall include:
- (1) the number of inspections and sampling events conducted for each SIU;
  - (2) the quarters in which these activities were conducted; and
  - (3) the compliance status of each SIU, delineated by quarter, and characterized using all applicable descriptions as given below:
    - (a) in consistent compliance;
    - (b) in inconsistent compliance;
    - (c) in significant noncompliance;
    - (d) on a compliance schedule to achieve compliance, (include the date final compliance is required);
    - (e) not in compliance and not on a compliance schedule;
    - (f) compliance status unknown, and why not.
- b) **Enforcement Summary:** This section shall contain a summary of the compliance and enforcement activities during the past year. The summary shall include the names of all the SIUs affected by the following actions:
- (1) Warning letters or notices of violations regarding SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
  - (2) Administrative Orders regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
  - (3) Civil actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
  - (4) Criminal actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice,

indicate whether it was for an infraction of a federal or local standard/limit or requirement.

- (5) Assessment of monetary penalties. Identify the amount of penalty in each case and reason for assessing the penalty.
- (6) Order to restrict/suspend discharge to the POTW.
- (7) Order to disconnect the discharge from entering the POTW.

**12) Baseline Monitoring Report Update**

This section shall provide a list of CIUs that have been added to the pretreatment program since the last annual report. This list of new CIUs shall summarize the status of the respective Baseline Monitoring Reports (BMR). The BMR must contain all of the information specified in 40 CFR 403.12(b). For each of the new CIUs, the summary shall indicate when the BMR was due; when the CIU was notified by the POTW of this requirement; when the CIU submitted the report; and/or when the report is due.

**13) Pretreatment Program Changes**

This section shall contain a description of any significant changes in the Pretreatment Program during the past year including, but not limited to: legal authority, local limits, monitoring/inspection program and frequency, enforcement protocol, program's administrative structure, staffing level, resource requirements and funding mechanism. If the manager of the pretreatment program changes, a revised organizational chart shall be included. If any element(s) of the program is in the process of being modified, this intention shall also be indicated.

**14) Pretreatment Program Budget**

This section shall present the budget spent on the Pretreatment Program. The budget, either by the calendar or fiscal year, shall show the amounts spent on personnel, equipment, chemical analyses and any other appropriate categories. A brief discussion of the source(s) of funding shall be provided.

**15) Public Participation Summary**

This section shall include a copy of the public notice as required in 40 CFR 403.8(f)(2)(vii). If a notice was not published, the reason shall be stated.

**16) Sludge Storage and Disposal Practice**

This section shall have a description of how the treated sludge is stored and ultimately disposed. The sludge storage area, if one is used, shall be described in detail. Its location, a description of the containment features and the sludge handling procedures shall be included.

**17) PCS Data Entry Form**

The annual report shall include the PCS Data Entry Form. This form shall summarize the enforcement actions taken against SIUs in the past year. This form shall include the following

information: the POTW name, NPDES Permit number, period covered by the report, the number of SIUs in significant noncompliance (SNC) that are on a pretreatment compliance schedule, the number of notices of violation and administrative orders issued against SIUs, the number of civil and criminal judicial actions against SIUs, the number of SIUs that have been published as a result of being in SNC, and the number of SIUs from which penalties have been collected.

**18) Other Subjects**

Other information related to the Pretreatment Program that does not fit into one of the above categories should be included in this section.

Signed copies of the reports shall be submitted to the Regional Administrator at USEPA, the State Water Resources Control Board and the Regional Board at the following addresses:

Regional Administrator  
United States Environmental Protection Agency  
Region 9, Mail Code: WTR-7  
Clean Water Act Compliance Office  
Water Division  
75 Hawthorne Street  
San Francisco, CA 94105

Pretreatment Program Manager  
Regulatory Unit  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street  
Sacramento, CA 95814

Pretreatment Coordinator  
NPDES Permits Division  
SF Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

## APPENDIX B:

### REQUIREMENTS FOR SEMIANNUAL PRETREATMENT REPORTS

The semiannual pretreatment reports are due on July 31<sup>st</sup> (for pretreatment program activities conducted from January through June) and January 31<sup>st</sup> (for pretreatment activities conducted from July through December) of each year, unless an exception has been granted by the Board's Executive Officer. The semiannual reports shall contain, at a minimum, but is not limited to, the following information:

#### 1) **Influent, Effluent and Sludge Monitoring**

The influent, effluent and sludge monitoring results shall be included in the report. The analytical laboratory report shall also be included, with the QA/QC data validation provided upon request. A description of the sampling procedures and a discussion of the results shall be given. (Please see Appendix C for specific detailed requirements.) The contributing source(s) of the parameters that exceed NPDES limits shall be investigated and discussed. In addition, a brief discussion of the contributing source(s) of all organic compounds identified shall be provided.

Each Discharger has the option to submit all monitoring results via an electronic reporting format approved by the Executive Officer. The procedures for submitting the data will be similar to the electronic submittal of the NPDES self-monitoring reports as outlined in the December 17, 1999 Regional Board letter, Official Implementation of Electronic Reporting System (ERS). The Discharger shall contact the Regional Board's ERS Project Manager for specific details in submitting the monitoring data.

If the monitoring results are submitted electronically, the analytical laboratory reports (along with the QA/QC data validation) should be kept at the discharger's facility.

#### 2) **Industrial User Compliance Status**

This section shall contain a list of all Significant Industrial Users (SIUs) that were not in consistent compliance with all pretreatment standards/limits or requirements for the reporting period. The compliance status for the previous reporting period shall also be included. Once the SIU has determined to be out of compliance, the SIU shall be included in the report until consistent compliance has been achieved. A brief description detailing the actions that the SIU undertook to come back into compliance shall be provided.

For each SIU on the list, the following information shall be provided:

- a. Indicate if the SIU is subject to Federal categorical standards; if so, specify the category including the subpart that applies.
- b. For SIUs subject to Federal Categorical Standards, indicate if the violation is of a categorical or local standard.
- c. Indicate the compliance status of the SIU for the two quarters of the reporting period.

- d. For violations/noncompliance occurring in the reporting period, provide (1) the date(s) of violation(s); (2) the parameters and corresponding concentrations exceeding the limits and the discharge limits for these parameters and (3) a brief summary of the noncompliant event(s) and the steps that are being taken to achieve compliance.

**3) POTW's Compliance with Pretreatment Program Requirements**

This section shall contain a discussion of the Discharger's compliance status with the Pretreatment Program Requirements as indicated in the latest Pretreatment Compliance Audit (PCA) Report, Pretreatment Compliance Inspection (PCI) Report or Pretreatment Performance Evaluation (PPE) Report. It shall contain a summary of the following information:

- a. Date of latest PCA, PCI or PPE and report.
- b. Date of the Discharger's response.
- c. List of unresolved issues.
- d. Plan and schedule for resolving the remaining issues.

The reports shall be signed by a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for the overall operation of the Publicly Owned Treatment Works (POTW) (40 CFR 403.12(j)). Signed copies of the reports shall be submitted to the Regional Administrator at USEPA, the State Water Resources Control Board and the Regional Board at the following addresses:

Regional Administrator  
United States Environmental Protection Agency  
Region 9, Mail Code: WTR-7  
Clean Water Act Compliance Office  
Water Division  
75 Hawthorne Street  
San Francisco, CA 94105

Pretreatment Program Manager  
Regulatory Unit  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street  
Sacramento, CA 95814

Pretreatment Coordinator  
NPDES Permits Division  
SF Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

## APPENDIX C

### REQUIREMENTS FOR INFLUENT, EFFLUENT AND SLUDGE MONITORING

The Dischargers shall conduct sampling of their respective treatment plant's influent, effluent and sludge at the frequency as shown in Table 1 on Page 15.

The monitoring and reporting requirements of the POTWs' Pretreatment Program are in addition to those specified in the individual POTW's NPDES permit. Any subsequent modifications of the NPDES requirements shall be adhered to and shall not affect the requirements described in this Appendix unless written notice from the Regional Board is received. When sampling periods coincide, one set of test results, reported separately, may be used for those parameters that are required to be monitored in both the Discharger's NPDES permit and Pretreatment Program. Monitoring reports required by this Order shall be sent to the Pretreatment Coordinator.

#### 1. Influent and Effluent Monitoring

The Dischargers shall monitor for the parameters using the required test methods listed in Table 1 (page 15). Any test method substitutions must have received prior written Regional Board approval. In addition, unless instructed otherwise in writing, the Dischargers shall continue to monitor for those parameters at the frequency stated in Table 1. Influent and Effluent sampling locations shall be the same as those sites specified in the POTWs' Self-Monitoring Programs as set forth in their respective NPDES permits.

The influent and effluent sampled should be taken during the same 24-hour period. All samples must be representative of daily operations. A grab sample shall be used for volatile organic compounds, cyanide and phenol. In addition, any samples for oil and grease, polychlorinated biphenyls, dioxins/furans, and polynuclear aromatic hydrocarbons shall be grab samples. For all other pollutants, 24-hour composite samples must be obtained through flow-proportioned composite sampling. Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto. For effluent monitoring, the reporting limits for the individual parameters shall be at or below the minimum levels (MLs) as stated in the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (2000) [also known as the State Implementation Policy (SIP)]; any revisions to the MLs shall be adhered to. The MLs are also listed in the Dischargers' respective NPDES permits that were adopted after April 2000. If a parameter does not have a stated minimum level, then the Dischargers shall conduct the analysis using the lowest commercially available and reasonably achievable detection levels.

The following standardized report format should be used for submittal of the influent and effluent monitoring report. A similar structured format may be used but will be subject to Regional Board approval. The monitoring reports shall be submitted with the Semiannual Reports.

- A. Sampling Procedures – This section shall include a brief discussion of the sample locations, collection times, how the sample was collected (i.e., direct collection using vials or bottles, or other types of collection using devices such as

automatic samplers, buckets, or beakers), types of containers used, storage procedures and holding times. Include description of prechlorination and chlorination/dechlorination practices during the sampling periods.

- B. Method of Sampling Dechlorination – A brief description of the sample dechlorination method prior to analysis shall be provided.
- C. Sample Compositing – The manner in which samples are composited shall be described. If the compositing procedure is different from the test method specifications, a reason for the variation shall be provided.
- D. Data Validation – All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks and standards. Ways in which the QA/QC data will be used to qualify the analytical test results shall be identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QC validation data shall be submitted to the Regional Board upon request.
- E. A tabulation of the test results shall be provided.
- F. Discussion of Results – The report shall include a complete discussion of the test results. If any pollutants are detected in sufficient concentration to upset, interfere or pass through plant operations, the type of pollutant(s) and potential source(s) shall be noted, along with a plan of action to control, eliminate, and/or monitor the pollutant(s). Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

## 2. **Sludge Monitoring**

Sludge should be sampled in the same 24-hour period during which the influent and effluent are sampled except as noted in (C) below. The same parameters required for influent and effluent analysis shall be included in the sludge analysis. The sludge analyzed shall be a composite sample of the sludge for final disposal consisting of:

- A. Sludge lagoons – 20 grab samples collected at representative equidistant intervals (grid pattern) and composited as a single grab, or
- B. Dried stockpile – 20 grab samples collected at various representative locations and depths and composited as a single grab, or
- C. Dewatered sludge- daily composite of 4 representative grab samples each day for 5 days taken at equal intervals during the daily operating shift taken from a) the dewatering units or b) from each truckload, and shall be combined into a single 5-day composite.

The U.S. EPA manual, POTW Sludge Sampling and Analysis Guidance Document, August 1989, containing detailed sampling protocols specific to sludge is recommended as a guidance for sampling procedures. The U.S. EPA manual Analytical Methods of

the National Sewage Sludge Survey, September 1990, containing detailed analytical protocols specific to sludge, is recommended as a guidance for analytical methods.

In determining if the sludge is a hazardous waste, the Dischargers shall adhere to Article 2, "Criteria for Identifying the Characteristics of Hazardous Waste," and Article 3, "Characteristics of Hazardous Waste," of Title 22, California Code of Regulations, Sections 66261.10 to 66261.24 and all amendments thereto.

Sludge monitoring reports shall be submitted with the appropriate Semiannual Report. The following standardized report format should be used for submittal of the report. A similarly structured form may be used but will be subject to Regional Board approval.

- A. Sampling procedures – Include sample locations, collection procedures, types of containers used, storage/refrigeration methods, compositing techniques and holding times. Enclose a map of sample locations if sludge lagoons or stockpiled sludge is sampled.
- B. Data Validation – All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks and standards. Ways in which the QA/QC data will be used to qualify the analytical test results shall be identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QC validation data shall be submitted to the Regional Board upon request.
- C. Test Results – Tabulate the test results and include the percent solids.
- D. Discussion of Results – The report shall include a complete discussion of test results. If the detected pollutant(s) is reasonably deemed to have an adverse effect on sludge disposal, a plan of action to control, eliminate, and/or monitor the pollutant(s) and the known or potential source(s) shall be included. Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

The Discharger shall also provide any influent, effluent or sludge monitoring data for nonpriority pollutants that the permittee believes may be causing or contributing to Interference, Pass Through or adversely impacting sludge quality.

Table 1: Required Monitoring Frequencies/Test Methods for POTWs with Approved Pretreatment Programs

	Influent and Effluent					Sludge
	VOC	BNA	O-Pest	C-Pest	Metals	
EPA Method	624	625	614	632	*	**
Dublin San Ramon SD	SA	SA			M	SA
Fairfield-Suisun SD	SA	SA			M	SA
Hayward	SA	SA			M	SA
Livermore	SA	SA			M	SA
Napa SD	SA	SA	SA	SA	M	SA
Novato SD	SA	SA			M	A***
Oro Loma/Castro Valley SD	SA	SA			M	SA
Palo Alto	SA	SA			M	SA
Petaluma	SA	SA			M	SA
San Francisco	Q	Q			M	SA
San Jose/Santa Clara	SA	SA			M	SA
San Leandro	SA	SA			M	SA
South Bayside SA	SA	SA			M	SA
South SF and San Bruno	SA	SA			M	SA
Sunnyvale	SA	SA			M	SA
Union Sanitary District	SA	SA			M	SA
Vallejo S&FCD	SA	SA			M	SA

VOC = volatile organic compounds

BNA = base/neutral and extractable organic compounds

O-Pest = organophosphorus pesticides

C-Pest = carbamate and urea pesticides

\* = Same EPA method used to determine compliance with the respective NPDES permit. The parameters are arsenic, cadmium, chromium, copper, lead, mercury, nickel, silver, zinc, selenium and cyanide.

\*\* = EPA approved methods

\*\*\* = Sampling performed during April through September only.

M = monthly sampling

Q = quarterly sampling

SA = semiannual sampling

A = annual sampling



# California Regional Water Quality Control Board

## San Francisco Bay Region



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

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Phone (510) 622-2300 • FAX (510) 622-2460

**Gray Davis**  
Governor

Date: **JUN 28 2001**  
File No. 1210.35 (MTC)

To: Attached Mailing List

The Regional Board adopted Order No. 01-059 at its meeting on Tuesday June 19, 2001. Enclosed is the adopted order that amends the NPDES permits for seventeen dischargers to revise pretreatment program requirements.

Should you have any questions or comments regarding this matter, please contact Michael Chee of my staff at (510) 622-2333, or e-mail him at [mtc@rb2.swrcb.ca.gov](mailto:mtc@rb2.swrcb.ca.gov).

Sincerely

Loretta K. Barsamian  
Executive Officer

Enclosure: Order No. 01-059

Mailing List for Pretreatment Order No. 01-059

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PRETREATMENT FILE NUMBERS

Dublin San Ramon SD	2199.9033
Fairfield-Suisun SD	2129.2005
Hayward	2199.9022
Livermore	2199.9025
Napa SD	2139.3009
Novato SD	2159.5022
Oro Loma	2199.9032
Palo Alto	2189.8011
Petaluma	2149.4006
San Francisco	2169.6010
San Jose/Santa Clara	2189.8014
San Leandro	2199.9037
South Bayside SA	2179.7037
South SF/San Bruno	2179.7038
Sunnyvale	2189.8018
Union SD	2199.9060
Vallejo S&FCD	2129.2012
PT Program	1210.35
PT Regulations & Policy	1123.42