

SANTA CRUZ COUNTY SANITATION DISTRICT

SPECIAL DISCHARGE PERMIT

This permit once issued by the Santa Cruz County Sanitation District (SCCSD) in accordance with District Code 7.04.280 authorizes the responsible party indicated below to discharge the listed waste(s). These waste(s) may be discharged to the District on a one-time basis or for the specified period of time indicated below. The responsible party must re-apply for a new permit 30 days prior to the expiration date of the permit or for any change in discharge characteristics.

Discharge Source:

Name: _____
 Site Address: _____
 City: _____ State: CA Zip: _____
 Mailing Address: _____
 City: _____ State: CA Zip: _____

Responsible Party:

Name: _____
 Address: _____
 City: _____ State: CA Zip: _____

Proposed Discharge:

Type of waste: Treated Photoprocessing Wastewater (Silver-rich solutions).
 Discharge Location: _____
 Discharge Date: January 2004 Duration of Discharge: 3 years

Date Baseline Analysis Received: _____

Analysis Accepted: Yes No Maximum Flow Rate: 5 gpm

Volume Discharge in gallons per day: _____

Flow Meter Required: Yes No Authorized Discharge Period: 1/1/04 to 1/1/07

Pretreatment or Other Requirements

All silver-rich solutions must be treated to recover silver prior to discharge to the sanitary sewer. Treatment options include, but are not limited to, the following: electrolytic recovery, metallic replacement, ion exchange (generally only for low silver concentration), and precipitation. Selected treatment technology must meet a certain degree of silver recovery efficiency as specified in the following table. Depending on silver-rich solution treatment volumes, dischargers are required to remove 90% (treating less than 2 gallons per day [gpd]), 95% (treating less than 20 gpd), or 99% (treating more than 20 gpd). Selected treatment technology must also meet District pH limitations as detailed in the following table.

Parameters	Limit or Percent Removal	Sample Frequency	Sample Required
pH	5 to 10	Annually	Two grab samples of silver-bearing waste stream one prior and one after treatment.
Silver	Specify one: 90%, 95%, or 99% depending on volume*	Annual laboratory analytical results.	

* *Percent removal is based on amount of silver-bearing waste discharged. Small facilities discharging less than 2 gallons per day (gpd) of silver-bearing waste must recover 90% of the silver from their waste-stream. Medium facilities discharging less than 20 gpd of silver-bearing waste must recover 95% of the silver from their waste-stream. Large facilities discharging over 20 gpd of silver-bearing waste must recover 99% of the silver from their waste-stream.*

Required Best Management Practice

The following are required best management practices:

1. During the first year of operation, or after any significant change in operation or volume of waste treated, the business must determine an adequate maintenance schedule for the treatment unit. The discharger must be able to demonstrate that the maintenance schedule will prevent the release of untreated waste to the sewer. This can be demonstrated through quarterly sampling for the first year of operation or through treatment unit specifications. For instance, if using metallic replacement cartridges that require change-out after every 200,000 prints, set the maintenance schedule to change the cartridges every 150,000 prints. Alternatively, if the cartridges do not have the change-out time specified, collect quarterly samples of the waste stream prior and after treatment to ensure it meets the required treatment efficiency of 90%, 95%, or 99% (depending on volume). If a sample during the third quarter indicates results below the required efficiency, then a discharger will want to swap out the cartridges every six months to be safe. A form to demonstrate the adequate maintenance schedule is provided as Attachment A.
2. Dischargers must have a Spill Response Plan and must train their employees on how to respond to a spill. There must be adequate spill response material to contain the largest quantity of a potential spill. An example Spill Response Plan is included as Attachment B.
3. Staff using the treatment unit must be trained in these required BMPs.

Reporting Requirements

Prior to beginning discharge of treated waste, the business will provide the above-mentioned best management practices, as well as baseline samples of the waste stream prior to and after treatment. Sample results must be recorded on the attached Wastewater Survey and Permit Application (Attachment C).

Annually thereafter, the business will sample their waste stream prior to and after treatment and record the treatment efficiency. Sampling results must be submitted by August 1st of every year and recorded in the attached Self-Monitoring Report (Attachment D). All samples must be collected and analyzed according to EPA standard methods for wastewater. Samples must be analyzed by a California State certified analytical laboratory.

Submittals must be sent to:

Santa Cruz County Sanitation District,
Attn: Environmental Programs Coordinator,
2750 Lode Street, Santa Cruz, CA 95062.

Enforcement and Standard Conditions

The Industrial User shall comply with all the general prohibitive discharge standards in Title 7 of the District Code including the amendments in Ordinance #103.

1. **Right of Entry** The Industrial User shall, after reasonable notification by the District, allow the District or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling or records inspection. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process wastewater discharge to the District's sewage system. Complete facility inspection will be performed by District personnel at least once per year.
2. **Records Retention**
 - a. The Industrial User shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analyses made by or in behalf of the user in connection with its discharge.
 - b. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the District shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.
3. **Confidential Information:** Except for data determined to be confidential under 7.04.510(H) of the District's Code, all reports required by this permit shall be available for public inspection at the office of the Sanitation District.
4. **Recording of Results:** For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:
 - a. The exact place, date, and time of sampling;
 - b. The dates the analyses were performed;
 - c. The person(s) who performed the analyses
 - d. The analytical techniques or methods used; and
 - e. The results of all required analyses.
5. **Dilution**

No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.
6. **Proper Disposal of Pretreatment Sludges and Spent Chemicals**

The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.(RCRA)

7. Revocation of Permit

The permit issued to the Industrial User by the District may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation.

8. Limitation on Permit Transfer

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the District. Sale of a User shall obligate the purchaser to seek prior written approval of the District for continued discharge to the sewage system.

9. Falsifying Information or Tampering with Monitoring Equipment

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the District, as well as being subjected to civil penalties and relief.

10. Modification or Revision of the Permit

- a. The terms and conditions of this permit may be subject to modification by the District at any time as limitations or requirements as identified in the District's Code, are modified or other just cause exists.
- b. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
- c. The terms and conditions may be modified as a result of EPA promulgating a new federal pretreatment standard.
- d. Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance of necessary modifications.

11. Duty to Reapply

The District shall notify a User one hundred and eighty (180) days prior to the expiration of the User's Permit. Within ninety (90) days of the notification, the User shall reapply for a new permit on a form provided by the District.

12. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

13. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State or Local regulations.

14. Accidental or Slug Discharge

The Industrial User shall notify the District immediately upon any accidental or slug discharge to the sanitary sewer as outlined in the Accidental Spill section of the District's Code (7.04.300). Formal written notification discussing circumstances and remedies shall be submitted to the District within 5 days of the occurrence.

15. New Wastewater or Pollutants

The Industrial User shall notify the District prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the industrial processes. Formal written notification shall follow within 30 days of such introduction.

16. Upset

Any upset experienced by the Industrial User for its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the District's Code shall be reported to the District within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed within 5 days.

17. Hazardous Waste

Permit holder shall report to the District all wastes which, if not discharged to the sewer system, would be considered hazardous waste according to 40 CFR 261.

18. Noncompliant Discharge Reporting

If permit holder discovers any discharge that, is in non-compliance with local or federal discharge standards, then sampling intervals shall be increased to every 30 days until compliance has been attained. If the District has initiated the sampling, then the District may elect to sample every 30 days until the industry has attained compliance. All costs including lab costs shall be borne by the permit holder.

PLEASE NOTE:

When notified of the costs, the permit holder has 90 days to pay said costs or face permit revocation.

19. Treatment Plant Notification

Any upset or period of noncompliance that the Industrial user even suspects shall cause an upset or pass-through at the City's treatment plant shall be reported immediately to the treatment plant at 420-6050 (day) or 420-6043 (night). Failure to do so will result in fines and liability of costs for damages to the treatment plant and the environment.

20. Enforcement Response Plan

Noncompliance with District Codes, permit requirements and discharge limitations will be enforced in accordance with the attached enforcement response plan (Attachment E)

(District Code Section 7.04.545).

21. Response to Violations of District Code

An industrial user is required to notify the Santa Cruz County Industrial Wastewater Pretreatment Program within 24-hours of the discovery of a violation of District Code (i.e., a spill or effluent limitation exceeded). In the event that there is an effluent limitation exceeded, the Industrial User must resample within 30-days.

Approved By: _____
Operations Manager

I, the responsible party indicated above, declare under penalty of perjury, that to the best of my knowledge I have accurately described the type, quantity, and source of all wastes which I now request to discharge to SCCSD. I further declare, under penalty of perjury, that I have personal knowledge or have had a qualified professional undertake such investigations as required to determine that this waste is not hazardous and meets the requirements of the SCCSD Code. I am aware of the conditions and requirements of the SCCSD Code and other requirements stated in this Special Discharge Permit. Further, I understand that failure to accurately describe the above information or failure to comply with the permit and/or any applicable SCCSD Code, may result in the immediate suspension of this Special Discharge Permit and/or other penalties as may be allowed by law.

Acknowledged by: _____ Date: _____
Responsible Party

ATTACHMENT A

MAINTENANCE SCHEDULE DETERMINATION

Name of Business: _____

Approximate #of prints, square feet of film, or rolls (circle one) developed per day: _____

Types of silver bearing waste generated: (check all that apply)

- Spent Cartridges
- Spent Fixer
- Rinse Water containing small quantities of fixer
- Developer

Types of chemicals used (look over inventory and check all that apply):

- Developer (ideal is regeneration) type _____
- Black & White film
- Fixer (ideal is reusable) type _____
- Color film

Silver Recovery System:

Select all that apply: <input type="checkbox"/> Metallic replacement <input type="checkbox"/> Ion Exchange		Efficiency*: <input type="checkbox"/> 90% Recovery
<input type="checkbox"/> Electrolytic Recovery <input type="checkbox"/> Reverse Osmosis		<input type="checkbox"/> 95% Recovery
<input type="checkbox"/> Precipitation <input type="checkbox"/> Other _____		<input type="checkbox"/> 99% Recovery
Treatment Volume: _____	Last date of Service: _____	
Maintenance Schedule:	_____ _____ _____ _____	

* *Efficiency is determined by taking a sample of the waste stream prior to and after treatment and analyzing it for silver. Then perform the following calculation:*
 $100 - [(Concentration\ of\ silver\ prior\ to\ treatment / concentration\ of\ silver\ after\ treatment) * 100]$
*For instance, if the concentration of silver in the wastewater going into the treatment unit is 3000 milligrams per Liter (mg/L) and the concentration of silver in the wastewater coming out of the treatment unit is 19 mg/L, the efficiency would be $100 - [(19/3000) * 100] = 99.37\%$*

Maintenance Schedule Determined by the following:

- Quarterly Sampling of waste stream before and after treatment quarterly for one year (include sample results)
- Treatment Unit specifications (include specifications or manufacturer's guarantee)

ATTACHMENT B

Posted Spill Response Plan

Spill Response Procedures:

1. Protect yourself first. Be sure and put on the appropriate personal protective equipment: gloves, goggles, and an apron.
2. Contain the spill with trays, or absorbent materials. Do not allow the material to reach storm or sewer drains.
3. Check the MSDS for the spilled substance for safe handling and disposition.
4. Clean up the spill as directed on the MSDS.
5. Use dry clean-up methods first, then wet clean-up methods. Do not send any wash water to the storm drain!
6. Package and label all contaminated materials (absorbents, PPE, liquids) for off-site disposal.
7. Notify the manager/owner that a spill has occurred (see below).
8. Notify the appropriate government agency (see below)

Spill Response Personnel

Manager Name:	Pager/Phone:
Owner Name:	Pager/Phone:
<i>Government Entities</i>	<i>Phone</i>
Industrial Wastewater Pretreatment Program	831.477.3907
Fire Department	
Environmental Health Services	831.454.2022

ATTACHMENT C

WASTEWATER SURVEY AND PERMIT APPLICATION

**ATTACHMENT D
SELF-MONITORING REPORT DUE AUGUST 1st EVERY YEAR**

Date: _____	
Name of Establishment: _____	
Address: _____	City: _____
Facility Contact: _____	Phone: _____
Approximate #of prints, square feet of film, or rolls (circle one) developed per day: _____	

Sample Date: _____
 Name of person collecting sample: _____
 Name of laboratory performing analysis: _____
 Sample Locations: _____

Sample Results:

Parameter	Result Prior to Treatment	Result After Treatment	Removal Efficiency*
Silver			
pH			

Silver Recovery System:

Select all that apply: <input type="checkbox"/> Metallic replacement <input type="checkbox"/> Ion Exchange <input type="checkbox"/> Electrolytic Recovery <input type="checkbox"/> Reverse Osmosis <input type="checkbox"/> Precipitation <input type="checkbox"/> Other _____		Efficiency*: <input type="checkbox"/> 90% Recovery <input type="checkbox"/> 95% Recovery <input type="checkbox"/> 99% Recovery
Treatment Volume: _____	Last date of Maintenance: _____	
Maintenance Schedule: _____	_____	

* Efficiency is determined by taking a sample of the waste stream prior to and after treatment and analyzing it for silver. Then perform the following calculation:
 $100 - [(Concentration\ of\ silver\ prior\ to\ treatment / concentration\ of\ silver\ after\ treatment) * 100]$
 For instance, if the concentration of silver in the wastewater going into the treatment unit is 3000 milligrams per Liter (mg/L) and the concentration of silver in the wastewater coming out of the treatment unit is 19 mg/L, the efficiency would be $100 - [(19/3000) * 100] = 99.37\%$

Certified Statement

Permit conditions for this facility **are or are not (circle one)** being met on a consistent basis. Sampling has been performed according to the requirements in the permit. I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals responsible for obtaining the information reported herein. I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature of Authorized Representative

Date

ATTACHMENT E
ENFORCEMENT RESPONSE PLAN