

To: **All Drycleaners**

Subject: **Sewer Use Permits for Drycleaners**

As mandated by the California Health and Safety Code and by the Environmental Protection Agency's National Pollution Discharge Elimination System Permit issued by the San Francisco Regional Water Quality Control Board, the Napa Sanitation District is responsible for the conveyance and treatment of all wastewater discharged to the sewers. The District regulates the type of wastewater acceptable for discharge to the sewer by means of the District's Sewer Use Ordinance and the Pretreatment Program. In many instances, the District has determined the need to control certain types of discharges to the sewer by issuing discharge permits.

The District is including as part of its State mandated Pretreatment Program a policy prohibiting the discharge of wastes or wastewaters contaminated with perchloroethylene (perc) into the public sewerage system. The prohibition also includes other breakdown products of perc such as trichloroethylene (TCE), cis-1,2-dichloroethene (DCE), trans-1, 2-dichloroethene, and 1,2, - dichloroethane. Perc has been shown to leak from sewers and may contribute to the contamination of the groundwater aquifer, to air emissions, to create a threat to worker health and safety, to interfere with operation of the District facilities, or to pass through the treatment plant into the receiving waters.

In order for the District to meet the State Pretreatment Program guidelines, all dry-cleaner facilities must obtain a Sewer Use Permit. The permit will require all drycleaners facilities to have zero discharge of waste or wastewater containing perc to the sanitary sewer. The only allowed discharge from drycleaner facilities is domestic waste. Attached please find an application for a Sewer Use Permit for businesses engaged in dry-cleaning of fabrics in the District's service area. All drycleaners in the District will be required to complete the attached permit application form as follows:

Facilities that act as drop and pick-up locations only and have no dry-cleaning equipment on the premises will not be required to have a permit. Drop and pick-up locations need only fill out the top portion of the application, indicating that dry-cleaning is **not** done on the premises, and sign the certification statement at the bottom of last page.

Businesses operating dry-cleaning equipment on the premises must fill out the application completely, sign the certification statement at the bottom of the last page and return it by _____ to:

William J. Gaffney
Pollution Prevention & Source Control Officer (P2SCO)
Napa Sanitation District
P.O. Box 2480
Napa, Ca. 94558

The Pollution Prevention & Source Control Department will review your application either issue a permit, request further information, or determine the necessity for a permit.

Sincerely,

DRYCLEANER PERMIT CONDITIONS

Part 1 - Special Conditions

- A.) The discharge of perchloroethylene and its breakdown products all of which will be known as perc, including wastewater from perc/water separators, still bottoms (muck), or other wastes containing perc or its breakdown products to the sanitary sewer or storm drain system is prohibited.
- B.) Equipment containing perc and unused/stored perc shall be double contained or removed from areas where spills to floor sinks, sumps, or other connections to the sewer system might occur. Perc shall be stored in a protected area away from extreme temperature and access to a sanitary sewer or storm drain.
- C.) Wastes containing perc or its breakdown products including used perc filters, sludge, and separator water generated at this location shall be handled, stored, and disposed of as hazardous wastes according to applicable local, State, and Federal regulations. A file, which documents all waste haul off activity, including all receipts or prepared manifests shall be maintained on file at this business establishment for a minimum of three years. These records shall be readily available for review by Napa Sanitation District (NSD) Pollution Prevention staff or designee during routine inspection activities. It is the responsibility of dry-cleaning facility personnel to acquire and maintain hauled waste manifests.
- D.) Storage containers shall be appropriately labeled and visible at all times. NSD approved secondary containment shall be provided to prevent discharge of wastes to the sanitary sewer system. The lid for each perc waste storage containers (drums) shall be securely fastened on the drum at all times except at the time of transferring waste products into the drum.
- E.) A legally licensed service shall be contracted to recycle or properly dispose of:
 - 1. Used perc filters and sludges;
 - 2. Condensate or any other substances containing perc;
 - 3. Any other wastes determined to be hazardous by the State of California
- F.) The only acceptable location for a floor drain shall be in the restroom area(s) provided that it is separated from the service area and that there is no potential for hazardous wastes or chemicals to enter the sewer system. If a drain is needed in the boiler room for boiler blow down, then the owner shall utilize a floor sink with the rim set a minimum of one inch (1") above the finished floor grade to prevent any accidental discharge of perk to the sanitary sewer. The floor sink shall be located in such a manner to prevent it from being a tripping hazard.
- G.) All required notices must be posted in a conspicuous place.

Part 2 - Reporting and Notification Requirements

- A.) The permittee shall submit a report within 24 hours of any instances of noncompliance during the year. The District's Pollution Prevention staff may conduct a random inspection of your facility. At the time of the inspection, you will be requested to show all pertinent information required in your discharge permit including the method used for disposal of any substance prohibited in Part A of this permit. The business shall notify the District of any anticipated significant process modifications that may cause a change in flow, constituent characteristics, or strength of your wastewater discharge.
- B.) The permittee shall notify the District's Pollution Prevention Department immediately upon the occurrence of an accidental discharge of any substance prohibited in Part 1 of this permit. During normal business hours, the Pollution Prevention Department can be notified by telephone at (707) 258-6000 extension 502. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.
- C.) This facility must submit to the District a follow-up report within five (5) days after an accidental discharge. The procedures for operational upsets/accidental discharges are described in the Industrial User Permit, Section D., Part 6., and Additional Reporting Requirements.

Part 3 - Standard Conditions

- A.) All dischargers shall comply with all conditions specified in the Napa Sanitation District's Industrial User Permit and other applicable laws, regulations, standards, and requirements contained in Article VII of the District's Sewer Use Ordinance 67 and any other applicable local, State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

Part 4 - Recommended Conditions

- A.) Area containing perc including the dry-cleaning apparatus and waste perc storage should be adequately bermed (secondary containment) in order to contain all wastes in the case of a spill or leakage. This area should also be coated with a material that is impervious to perc to prevent contamination of soil and groundwater.