


PIMA COUNTY
WASTEWATER RECLAMATION

May 26, 2016

Mr. Jonathan H. Gardner
Southern Arizona VA
Health Care System
3601 South 6th Avenue
Tucson, Arizona 85723-0001

SERVICE ADDRESS
Southern Arizona VA
Health Care System
3601 South 6th Avenue
Tucson, Arizona

Dear Mr. Gardner:

RE: Modification of Industrial Wastewater Discharge Permit No.10868

Enclosed is the Modification for the referenced facility. This permit is modified to remove the compliance schedule requirements and add the option of certifying a procedural statement in lieu of sampling for Location No. 2. This statement information can be found on Page 7. Please review these documents and comment on any items that are of concern to you.

This document has important legal consequences. Please read and understand all the requirements and conditions stated herein.

The Permit is based on the Pima County Code, Title 13, Chapter 36.

If questions arise, please contact my staff in the Industrial Wastewater Control Section at (520) 724-6200.

Sincerely,



F. Jeff Prevatt
Manager – Compliance and Regulatory Affairs Office

FJP:dg
Enclosures

*Removes
Need
for
sampling
at
location
#2*

Industrial Wastewater Control

Jackson Jenkins, Director

2955 West Calle Agua Nueva Tucson, AZ 85745 • Phone: 520-724-6200 • Fax: 520-724-6211

FACT SHEET FOR INDUSTRIAL WASTEWATER DISCHARGE
PERMIT NO. 10868

I. AUTHORITY

Pima County Code, Title 13, Chapter 36 (Code) establishes the authority for Pima County Regional Wastewater Reclamation Department to manage the acceptance of industrial waste discharged into the sewerage system through adequate regulation of industrial wastewater discharges, including septage.

This is accomplished in compliance with a Publicly Owned Treatment Works (POTW) Pretreatment Program. This Program is mandated by the Arizona Pollutant Discharge Elimination System (AZPDES) permits issued by the Arizona Department of Environmental Quality (ADEQ) to the Pima County POTW in conformance with 40 CFR Part 403, and the Clean Water Act (CWA) as amended in 1977, as amended by the Water Quality Act (WQA) of 1987.

II. INDUSTRIAL INFORMATION AND CLASSIFICATION

Southern Arizona VA Health Care System (hereinafter referred to as the Permittee), is located at 3601 South 6th Avenue, Tucson, Arizona. Industrial wastewater is discharged to the POTW contributory to the Pima County Agua Nueva Water Reclamation Facility and Tres Rios Water Reclamation Facility.

The Permittee is a healthcare facility that has 2,587 employees. Hours of operation are 24 hours a day, seven days a week. Industrial wastewater is generated primarily from medical, surgical, laboratory, kitchen, laundry and housekeeping activities. An industrial pretreatment system is on-site and consists of a grease trap. Industrial wastewater is continuously discharged at a rate of 170,100 gallons per day. Operations at the facility have been identified as having the North American Industry Classification System (NAICS) Code of 622110.

Based on the Renewal Application and Questionnaire submitted to, and approved by Pima County on August 10, 2015, the Permittee has been determined to be a Significant Industrial User as defined in 40 CFR 403.3(v).

Upon renewal inspection, issues which violated or had the potential to violate Pima County Ordinance were found. The Permittee was given ample time to correct these issues prior to the previous permit expiration. These problems were not corrected in time; therefore this permit is being issued with a 90-day compliance schedule. If the violations listed in Part I.E of the Permit are not corrected within 90 days of issuance of this permit, then a notice of violation and order to cease discharge may be issued and the Permittee may be subject to fines.

As a designated Significant Industrial User, the Permittee may petition Pima County to be deleted from the list of Significant Industrial Users. The Permittee's petition must be based on the fact that the Permittee's industrial wastewater discharge has no potential for adversely affecting the operation of the POTW. The petition must be

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made in writing to the Director of the Pima County Regional Wastewater Reclamation Department.

The Permittee applied for and received an Industrial Wastewater Discharge Permit that became effective on February 1, 1985. Their second Permit became effective May 1, 1991. Their third Permit became effective June 1, 1996. Their fourth Permit became effective February 21, 2001. Their fifth Permit became effective February 21, 2006. Their sixth Permit became effective February 21, 2011. This will be the Permittee's seventh Permit.

III. SELECTION OF SAMPLE LOCATION

Sample Location No. 1: Manhole No. 5255-PV04

Samples shall be taken at the manhole located between Building 90 and the Julian Wash.

~~Sample Location No. 2: Manhole No. 8~~ — deleted, per permit modification

~~Samples shall be taken at the manhole located 25 feet north of Building 6.~~

~~• These locations provide sampling prior to commingling of industrial and domestic wastestreams as required by Pima County Code 13.36.130.B.~~

~~• These locations provide unrestricted physical access during operational hours as required by Pima County Code 13.36.130.C.~~

IV. SELECTION OF POLLUTANT PARAMETERS

Receiving Stream: Santa Cruz River

In order to protect the beneficial uses of surface waters, the State of Arizona has adopted water quality standards for different stream segments which depend on the level of protection required. Pima County Regional Wastewater Reclamation Department Facilities discharge to the Santa Cruz River. For this particular segment of the Santa Cruz River Basin (Agua Nueva Water Reclamation Facility Outfall to Baumgartner Road Crossing), the designated beneficial uses are: Aquatic and Wildlife effluent dependent water, and Partial Body Contact (A.A.C.R18-11-Appendix B: List of Surface Waters and Designated Uses).

Rationale for Effluent Limitations

The Federal Water Pollution Control Act of 1972 states that Pretreatment Standards shall prevent the discharge to the POTW of any pollutant that may interfere with, pass through, or otherwise be incompatible with the POTW. The Clean Water Act

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of 1977 further stipulated that industrial discharges must not interfere with the use and disposal of municipal biosolids.

In conducting monitoring necessary to demonstrate compliance with the Pretreatment Standards, the Industrial User is required to analyze for federally and locally regulated pollutants. The pollutants that have reasonable potential to be present in the discharge will be monitored, using the following evaluation criteria:

- a. National Pretreatment Standards; or,
- b. Local Limits - based on Pima County Code Title 13, Chapter 36.070 discharge limits adopted by Pima County Board of Supervisors on June 18, 2013.

When the permitting authority determines that a discharge causes, has the reasonable potential to cause, or contributes to an excursion above the allowable concentration of a numeric standard for an individual pollutant, the Permit must contain effluent limits for that pollutant.

An evaluation of the Permittee's Industrial Classification, General Medical and Surgical Hospitals, has identified the following pollutants of concern: pH, Barium, Copper, Zinc, Purgeable Organics, Chemical Oxygen Demand, Total Suspended Solids, Oil and Grease, and Flow.

V. BASIS FOR MODIFICATION

The Permit is being modified as part of the Permit Renewal process.

VI. PERMIT SECTIONS TO BE MODIFIED

The Pima County Industrial Wastewater Discharge Permit issued to the Permittee is modified pursuant to Part 13.36.130.Q. of the Code. The following sections of the Permit are modified:

Permit Section	Permit Page(s)	Section Title
Part I.A.2	2	Discharge Limitations and Monitoring Requirements
Part I.A.3	3 - 5	Discharge Limitations and Monitoring Requirements
Part I.B.3	6	Reporting Requirements
Part I.B.4	6	Reporting Requirements
Part I.E	8	Compliance Schedule

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Part I.A.2 Discharge Limitations and Monitoring Requirements

Sample Location No. 3 has been removed from the Permit and replaced with Sample Location No. 1, based on the site inspection. Also, the Sample Location No. 2 description has been changed for clarification.

Part I.A.3 Discharge Limitations and Monitoring Requirements

The sample parameters of Purgeable Halocarbons and Purgeable Aromatics have been combined into Purgeable Organics.

Phenols have been added as a sample parameter.

Part I.B.3 Reporting Requirements

The 24-Hour Discharge Violation Notification has been changed for clarification.

Part I.B.4 Reporting Requirements

The Pima County Regional Wastewater Reclamation Department Immediate Notification Requirement has been added to clarify notification requirements.

Part I.E Compliance Schedule

This section has been added to the permit to define compliance requirements.

VII. REQUIREMENT TO CONTROL SLUG DISCHARGES

On October 14, 2005, the Environmental Protection Agency adopted amendments to the General Pretreatment Regulations to enhance the control of toxic pollutants and hazardous wastes discharged to the POTWs. Discharges of this nature have been identified as causing POTW workers illness, actual or threatened explosions, upsets or inhibitions of biological treatment processes, toxic fumes, corrosion, and contamination of both sludges and receiving waters. The amendments address how business and industry control both spills and high strength batch discharges called slug discharges.

A Slug Control Discharge Plan that contains the minimum program elements required by 40 CFR 403.8(f)(2)(B)(6), was submitted to, and accepted by Pima County on August 10, 2015.

VIII. NOTIFICATION OF DISCHARGE OF HAZARDOUS WASTE

The Permittee has not made notification of any hazardous waste discharges. By lack of this notification, the Permittee is asserting that it is not discharging a waste that, if

FACT SHEET FOR INDUSTRIAL WASTEWATER DISCHARGE
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otherwise disposed of, would be considered a hazardous waste as defined by 40 CFR 261. The Permittee shall comply with 40 CFR 403.12(p), which sets forth reporting and notification requirements for the discharge into the POTW of a substance which, if otherwise disposed of, would be defined as a hazardous waste by 40 CFR 261.

IX. JUDICIAL PROCEEDINGS

Statements of applicable civil and criminal penalties for violations of Pretreatment Standards and requirements are included in all Permits.

X. NOTIFICATION OF INDUSTRIAL NESHAP COMPLIANCE

On October 26, 1999, the Environmental Protection Agency (EPA) adopted National Emissions Standards for Hazardous Air Pollutants (NESHAP) from POTWs [40 CFR 63.1580]. This action promulgates NESHAP for new and existing POTWs. Each of these hazardous air pollutants can cause adverse health effects provided sufficient exposure. The hazardous air pollutants emitted by POTWs originate in wastewater streams discharged by industrial, commercial, and other facilities. Hazardous air pollutants present in wastewater entering POTW treatment plants can biodegrade, adhere to sewage biosolids, volatilize to the air, or pass through to receiving waters.

With this final rule, the EPA is requiring air pollution controls on a new or reconstructed treatment plant at a POTW that is a major source of hazardous air pollutants. The standards also require that new and existing POTWs treating regulated waste streams from an industrial user [for the purpose of allowing that industrial user to comply with another NESHAP] to meet the treatment and control requirements of the other relevant NESHAP. Industries are required by 40 CFR 63.132(g) "Off-site treatment or on-site treatment not owned or operated by the source" to notify to POTW if they utilize the POTW for control of hazardous air pollutants.

The Pima County POTWs are classified as non-industrial POTWs for the purpose of 40 CFR 63 – National Emissions Standards for Hazardous Air Pollutants for Source Categories. Pima County is not aware of any industrial source that is utilizing the POTW as the treatment control of a hazardous air pollutant covered by an industrial NESHAP.

The Permittee has not declared that it utilizes the POTW to provide disposal, treatment, and or control to comply with the industrial NESHAP. This Permit is issued on the basis that the POTW does not receive a regulated waste stream as an agent for the Permittee. Failure to disclose a material fact could result in judicial proceedings. In the future, the Permittee must make notification 90 days prior to a compliance date specified in the appropriate NESHAP for the industrial user if the POTW is a control mechanism for an industrial NESHAP.

This document has important legal consequences. Read and understand all of the requirements and conditions stated herein.



Part I
Page 1 of 11
Permit No. 10868
Revised: May 26, 2016

PART I

Industrial Wastewater Discharge Permit Pima County Regional Wastewater Reclamation Department

In compliance with the provisions of the Clean Water Act,
as amended (33 U.S.C. 1251 et seq., the "Act"),

Southern Arizona VA Health Care System

is authorized to discharge industrial wastewater from the noted business located at

3601 South 6th Avenue
Tucson, Arizona

to the Pima County public sanitary sewerage contributory to the Agua Nueva and Tres Rios Water Reclamation Facilities. This is in accordance with Pima County Code, Title 13, Chapter 36, effluent limitations, monitoring requirements and other conditions set forth herein, and in the attached thirteen pages of Pima County "Standard Permit Conditions," dated June 18, 2013.

This Permit became effective March 1, 2016.

The Modification is effective May 26, 2016.

This Permit, and the authorization to discharge industrial wastewaters, shall expire at midnight on February 28, 2021.

Signed this 26th day of May 2016.

A handwritten signature in black ink, appearing to read "F. Prevatt", is written over a horizontal line.

F. Jeff Prevatt
Manager – Compliance and Regulatory Affairs Office

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

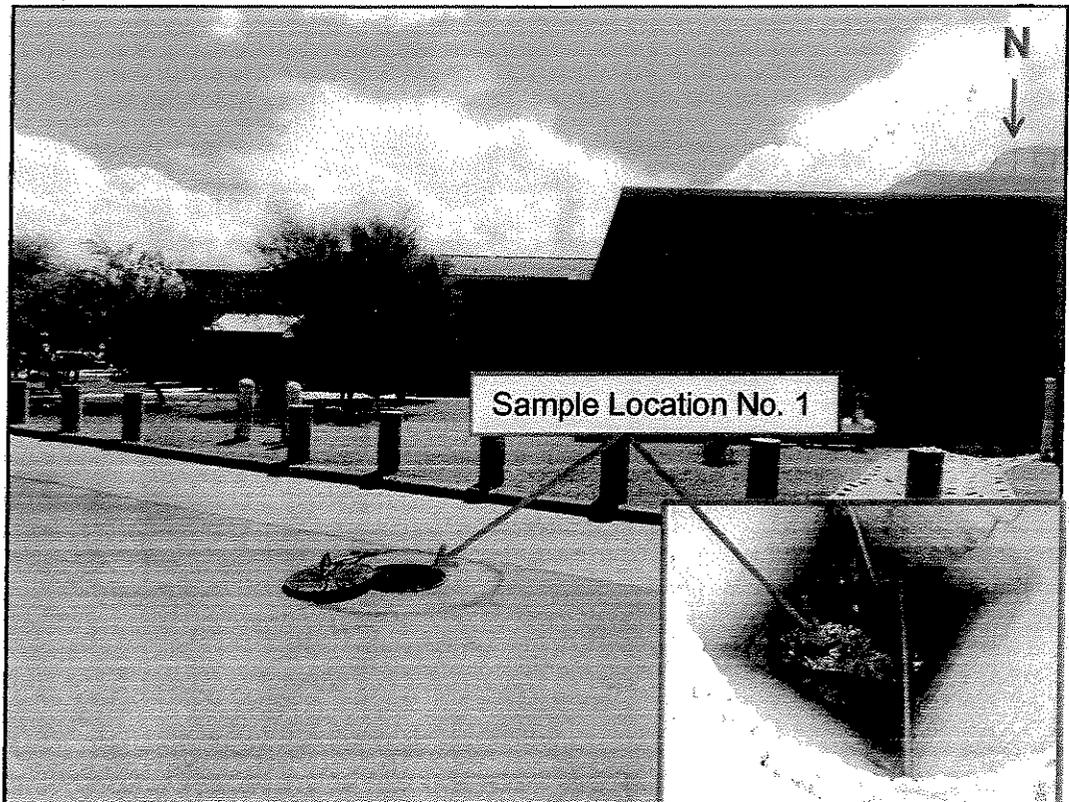
1. Authorization

During the effective period of the Permit, the Permittee is authorized to discharge to the POTW, and all discharged industrial wastewater shall pass through a designated Sample Location(s) as indicated in Part I.A.2 of this Permit.

2. Sample Locations

Sample Location No. 1: Manhole No. 5255-PV04

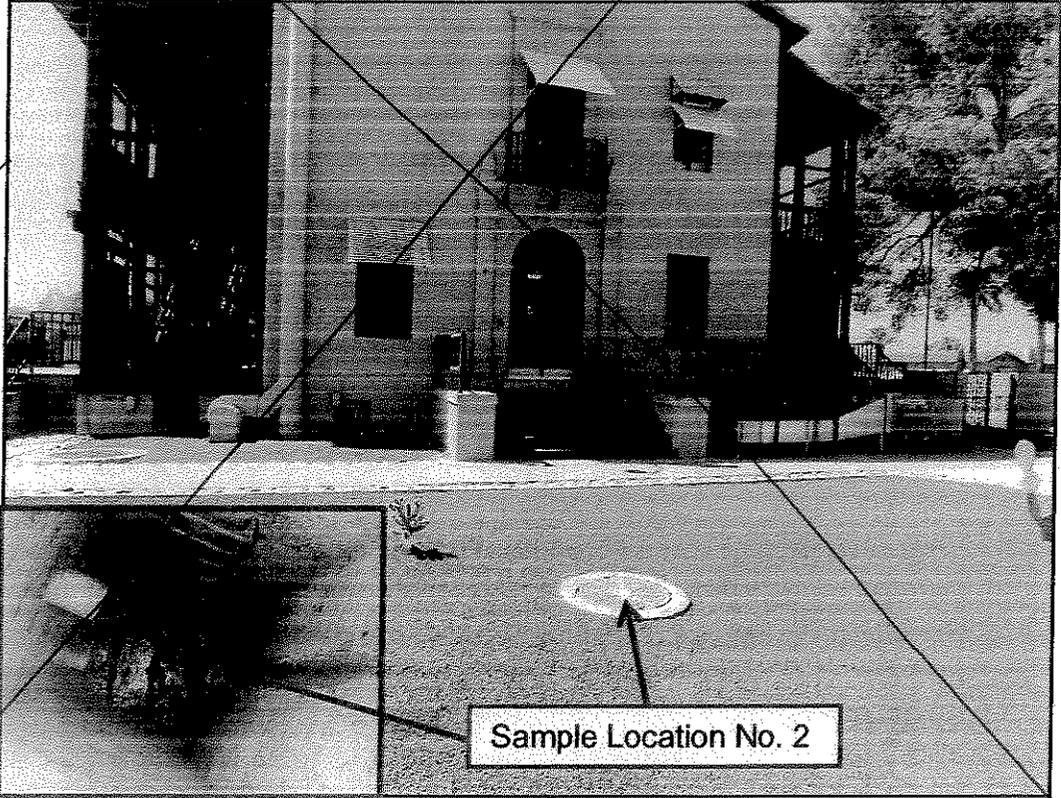
Samples shall be taken at the manhole located between Building 90 and the Julian Wash, as shown below.



Sample Location No. 2: Manhole No. 8

Samples shall be taken at the manhole located 25 feet north of Building 6, as shown below.

Sample location deleted



3. Discharge Limitations and Monitoring Requirements

- a. Samples obtained from the Sample Locations shall be analyzed for the parameters specified in the Discharge Limitations below.

DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS FOR SAMPLE LOCATION NO. 1			
PARAMETERS	DAILY MAXIMUM	SAMPLE TYPE	MONITORING FREQUENCY
pH	5.0-11 S.U. (Min/max for any time)	Grab (1)	Once per three months
Barium (Total)	10.0 mg/l	Composite (2)	Once per three months
Copper (Total)	1.2 mg/l	Composite	Once per three months

DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS FOR SAMPLE LOCATION NO. 1			
PARAMETERS	DAILY MAXIMUM	SAMPLE TYPE	MONITORING FREQUENCY
Purgeable Organics (3)	***	Grab	Once per three months
Phenols (3)	***	Composite	Once per three months
Chemical Oxygen Demand	***	Composite	Once per three months
Oil and Grease	200 mg/l	Grab	Once per three months
Total Suspended Solids	***	Composite	Once per three months
Flow (Daily Average)	***	Measurement (Continuous recording any representative day) (4)	Once per three months

DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS FOR SAMPLE LOCATION NO. 2 - NONE			
PARAMETERS	DAILY MAXIMUM	SAMPLE TYPE	MONITORING FREQUENCY
pH	5.0-11 S.U. (Min/max for any time)	Grab (1)	Once per three months
Barium (Total)	10.0 mg/l	Composite (2)	Once per three months
Lead (Total)	0.5 mg/l	Composite	Once per three months
Zinc (Total)	2.6 mg/l	Composite	Once per three months
Purgeable Organics (3)	***	Grab	Once per three months
Phenols (3)	***	Composite	Once per three months
Chemical Oxygen Demand	***	Composite	Once per three months
Oil and Grease	200 mg/l	Grab	Once per three months

DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS FOR SAMPLE LOCATION NO. 2			
PARAMETERS	DAILY MAXIMUM	SAMPLE TYPE	MONITORING FREQUENCY
Total Suspended Solids	***	Composite	Once per three months
Flow (Daily Average)	***	Measurement (Continuous recording any representative day) (4)	Once per three months

*** Monitoring and reporting required.

- (1) A grab sample is any individual (discrete) sample collected over a period of time, not to exceed 15 minutes.
 - (2) A composite sample is a combination of no fewer than four individual portions obtained at equal time or flow intervals for 24 hours or for the duration of discharge, whichever is shorter.
 - (3) Shall be analyzed for those parameters specified in Appendix A.
 - (4) Flow measurement shall be conducted at each of the Sample Locations. The measurement device must have an accuracy of $\pm 5\%$ and a repeatability error of less than 2%. The results of calibration shall be signed by the engineer or technician doing the work.
- b. All samples shall be collected, preserved, and analyzed using an appropriate EPA Method referenced in 40 CFR 136, unless otherwise noted.
 - c. Samples and measurements taken for the purpose of monitoring shall be representative of the permitted activity.
4. Other Monitoring Requirements
- a. Records of the grease trap cleaning shall be kept on-site. Records shall include, but not be limited to the amount removed, the name of the company or individual collecting these wastes, and the date of the collection.

- b. Records shall be kept on-site showing collection of waste solvents, contaminated fuels, degreasers, oil, and grease including, but not be limited to the amounts, the name of the company or individual collecting these wastes, and the date of the collection.
- c. Samples shall be taken within one week prior to cleaning the grease trap.
- d. Records shall be kept on-site of all flow monitoring measurements, and shall include, but not be limited to documentation of instrument calibration and maintenance.
- e. All records, or copies thereof, kept under conditions of this Permit shall be available for inspection during normal business hours.

B. REPORTING REQUIREMENTS

- 1. Monitoring results obtained during each three-month sampling period shall be submitted, in tabular form, and postmarked no later than the 28th day of the month after the end of the sampling period.

The next sampling period ends on July 31, 2016, and the report is due no later than August 28, 2016, and each three months thereafter.

- 2. All reports shall be submitted to Pima County Regional Wastewater Reclamation Department at the following address:

Pima County Regional Wastewater Reclamation Department
Industrial Wastewater Control Section
2955 West Calle Agua Nueva
Tucson, Arizona 85745

- 3. Twenty-four hour Discharge Violation Notification required under Part II 13.36.150.A.1.b of the Permit, shall be made to the following:

Telephone Number: (520) 724-6200
Fax Number: (520) 724-6211

Contractor to immediately notify CDR in the event of a discharge violation

- 4. Immediate notification for Bypass, Upset, Accidental Discharge, Spill, or Slug Load, as required by Part II 13.36.150.A.1.a of the Permit, shall be made to the following:

Emergency Notification Telephone Number: (520) 724-6047

5. The Permittee shall comply with 40 CFR 403.12(p), which sets forth reporting and notification requirements for the discharge into the POTW of a substance which, if otherwise disposed of, would be defined as a hazardous waste by 40 CFR 261.
6. Immediately upon discovery of the discharge of any of the pollutants in Appendix B, which may endanger health, the environment, or the POTW, the Permittee shall notify the Pima County Regional Wastewater Reclamation Department.

SAVATHES
will do
this

7. In lieu of monitoring at Sample Location No. 2, the Permittee may submit the below certification with each report in which sampling from this location is not performed. A copy of the statement can be found in Appendix C for the Permittee to submit along with the required quarterly Self-Monitoring Report Form.

"Based on my inquiry of the person or persons who manage the operation, or those persons directly responsible for gathering information, the current discharge practices contributing to Sample Location No. 2, have not changed and best management practices are in place to ensure compliance. I am aware that there are significant penalties for submitting false information, including, but not limited to the possibility of fines and/or imprisonment."

C. REQUIREMENT TO CONTROL SLUG DISCHARGES

The Permittee shall comply with the Requirement to Control Slug Discharges Plan submitted to and accepted by Pima County on August 10, 2015, and hereby incorporated by reference and made part of this Permit.

D. JUDICIAL PROCEEDINGS

1. Initiation of Legal Action

Whenever the Director finds that a USER has violated any of the provisions of Pima County's Industrial Wastewater Ordinance, Title 13 of the Pima County Code ("the Ordinance") as implemented in this PERMIT, the Director may ask the County Attorney to take appropriate legal action. This legal action may include, among other things, the following:

- a. Prohibitive injunctions;
- b. Mandatory injunctions for corrective action and cleanup;
- c. Civil penalties in accordance with the Ordinance;

- d. Criminal penalties set forth in County Ordinances adopted pursuant to A.R.S. § 11-251.05;
 - e. Recovery of civil damages, penalties, and costs to the POTW.
2. Civil and Criminal Penalties for Violation
- a. The civil penalties for violation of any Article of the Ordinance, any part of a PERMIT written and issued in compliance with this Ordinance and/or any requirement of a Notification of Violation written and issued in compliance with said Ordinance, shall not exceed twenty-five thousand dollars (\$25,000.00) for each violation. For continuing violations, each day may constitute a separate offense.
 - b. The civil penalties for non-submittal of reports, noncompliance with the reporting and/or application requirements required in the Ordinance or the PERMIT, or failure to complete an increment of progress of a compliance schedule, shall not exceed one thousand dollars (\$1,000.00) for each day in which the requirements are not fulfilled.
 - c. Any person who attempts to deceive a government agency by submitting documents to the agency or by making statements to a representative of the agency which they know to be false, or by destroying or concealing or refusing to deliver papers or records required by the agency to be kept for its information, is subject to prosecution for tampering with a public record or fraudulent schemes and practices. Tampering with a public record is a Class 6 Felony (A.R.S. § 13-2407), and carries a maximum penalty of 1.875 years imprisonment and/or a \$150,000.00 fine. Fraudulent schemes and practices is a Class 5 Felony (A.R.S. § 13-2311), and carries a maximum penalty of 2.5 years imprisonment and/or a \$150,000.00 fine.

APPENDIX A

Purgeable Organics List

Bromodichloromethane
Bromoform (tribromomethane)
Methyl bromide (bromomethane)
Carbon tetrachloride (tetrachloromethane)
Chlorobenzene
Chloroethene
2-Chloroethyl vinyl ether (mixed)
Chloroform (trichloromethane)
Methyl chloride (chloromethane)
Dibromochloromethane
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Dichlorodifluoromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethene
trans-1,2-Dichloroethene
1,2-Dichloropropane
cis-1,3-Dichloropropene
trans-1,3-Dichloropropene
Methylene chloride (dichloromethane)
1,1,2,2-Tetrachloroethane
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Tetrachloroethene
Trichlorofluoromethane
Vinyl chloride (chloroethylene)
Benzene
Ethylbenzene
Toluene

Phenol Species

Phenol
Pentachlorophenol
2,4-Dichlorophenol
2,4-Dinitrophenol
2,4-Dimethylphenol
2-Chlorophenol
4-Chloro-3-Methyl-phenol
2-Methyl-4,6-Dinitrophenol
2-Nitrophenol
4-Nitrophenol
2,4,6-Trichlorophenol

APPENDIX B

FUME TOXICITY PARAMETERS

COMPOUND	Ordinance Limit mg/l
Acrylonitrile	1.24
Benzene	0.13
Bromomethane	0.002
Carbon disulfide	0.06
Carbon tetrachloride	0.03
Chlorobenzene	2.35
Chloroethane	0.42
Chloroform	0.42
Chloromethane	0.007
1,2-Dichlorobenzene	3.74
1,4-Dichlorobenzene	3.54
1,1-Dichloroethane	4.58
1,2-trans-Dichloroethene	0.28
1,2-Dichloropropene	3.65
1,3-Dichloropropene	0.09
Ethyl benzene	1.59
Ethylene dichloride	1.05
Heptachlor	0.003
Hexachloro-1,3-butadiene	0.0002
Hexachloroethane	0.96
Methyl ethyl ketone (2-butanone)	249.0
Methylene chloride	4.15
Tetrachloroethene	0.53
Toluene	1.35
1,2,4-Trichlorobenzene	0.43
1,1,1-Trichloroethane	1.55
Trichloroethene	0.71
Vinyl chloride	0.003
Vinylidene chloride	0.003
Aroclor 1242	0.01
Aroclor 1254	0.005

APPENDIX C

CERTIFICATION STATEMENT FOR SAMPLE LOCATION NO. 2

Based on my inquiry of the person or persons who manage the operation, or those persons directly responsible for gathering information, the current discharge practices contributing to Sample Location No. 2, have not changed and best management practices are in place to ensure compliance. I am aware that there are significant penalties for submitting false information, including, but not limited to the possibility of fines and/or imprisonment.

Authorized Representative

Date