



Agenda Date: 7/17/2019

Agenda Placement: 7K

## Napa Sanitation District Board Agenda Letter

---

**TO:** Honorable Board of Directors

**FROM:** Andrew Damron for Timothy Healy - General Manager  
NS-Technical Services/Engineer

**REPORT BY:** Stephanie Turnipseed, Pollution Prevention and Outreach Coordinator - 707-258-6002

**SUBJECT:** Best Management Practices Updates

---

### **RECOMMENDATION**

Adopt the revised Best Management Practices (BMPs), which serve as pollutant control mechanisms per NapaSan's Code, Section 4.04.090.

### **EXECUTIVE SUMMARY**

During the review of recent development projects, it came to the attention of staff that NapaSan's existing Best Management Practice (BMP) documents need to be updated. Some of the BMPs need to be updated to reflect new policies while others simply need logo, contact information, and format updates. In all the BMP documents, "Napa Sanitation District" was replaced with "NapaSan" for consistency. The revisions to individual BMP documents are detailed below. The year that each BMP document was adopted or last updated is in parentheses next to each title.

- **Best Management Practices for Boiler Blowdown (2016)** - Modified to remove the recommended operational optimization and cleaning information since other agencies have jurisdiction over these systems and provide this guidance.
- **Best Management Practices for Cooling Towers (2016)** - Modified to explain that the installation of a pre-treatment system for cooling tower water aids a business in meeting the local limits in the NapaSan Code. The recommended practice of using cooling tower water on site for landscape irrigation purposes was removed from the document since this use of cooling tower water would have to be permitted by other agencies. Additionally, the recommended bleed off, operational optimization, cleaning, and water conservation options were removed from the document since other agencies have jurisdiction over these systems and provide this guidance.
- **Best Management Practices for Dry Cleaners (2011)** - Modified to direct dry cleaning facilities to the EPA

website for proper and up-to-date perchloroethylene (PCE) storage practices. The document was also edited to reflect that floor drains should not be located in boiler rooms and that boiler blowdown discharge to the sanitary sewer system is not allowed.

- **Best Management Practices for Managing Fats, Oils, and Grease (FOG) at Your Food Service Facility (2011)** - Modified to include the grease interceptor requirement for all new or modified food establishments. The BMP was also edited to include the a requirement (for new facilities only) with a grease trap or interceptor maintenance agreement and submittal of grease trap and interceptor maintenance logs to NapaSan staff. Additionally, website links for cooking oil dropoff and local grease hauler information were updated.

- **Best Management Practices for Plumbers (2011)** - Title was changed to Best Management Practices for Plumbers and Plumbing Design since many of the listed practices apply to the design of plumbing work as well as installation and maintenance.

- **Best Management Practices for Sand-Oil Separators (2017)** - Modified to include language specifying that only vehicle wash water may be discharged to the sand-oil separator. The threshold for cleaning separators was changed to match the grease interceptor cleaning threshold, which states that floating oil and bottom solids shall not be more than 25% of the depth measured from the bottom of the separator to the top of the floating oil. Lastly, the new requirement for a sand-oil separator maintenance agreement and submittal of maintenance logs to NapaSan staff were added to the BMP document. This revision of this BMP document coincides with the start of our sand-oil separator inspection process, and this revised document will be given to tenants at each inspected facility.

- **Best Management Practices for Vehicle Repair and Maintenance (2017)** - Modified to specify that no wastewater other than domestic sewage shall be discharged to the sanitary sewer with the exception of auto body wash water that has been treated by a sand-oil separator permitted by NapaSan. Review of recent development projects showed that clear language stating that oil and other vehicle fluids shall not be discharged to the sand oil separator was a necessary addition to this BMP document.

- **Best Management Practices for Commercial and Industrial Water Softeners (2016)** - A typographical error was fixed and the agency name and logo were made consistent throughout the document.

- **Best Management Practices for Wineries and Breweries (2012)** - Formatting was updated to be consistent with all of NapaSan's other BMP documents. The title was changed to Best Management Practices for Non-Commercial Wineries and Breweries since larger, commercial facilities are already subject to other regulations.

## **FISCAL IMPACT**

Is there a Fiscal Impact?                      No

## **ENVIRONMENTAL IMPACT**

ENVIRONMENTAL DETERMINATION: The proposed action is not a project as defined by 14 California Code of Regulations 15378 (State CEQA Guidelines) and therefore CEQA is not applicable.

## **BACKGROUND AND DISCUSSION**

40 CFR part 403.5(c)(4) states that publicly owned treatment works (POTWs) may develop Best Management Practices (BMPs) as an alternate to numeric limits for preventing pollutants from entering the wastewater stream. NapaSan intends to use BMPs to regulate certain categories of industrial users. BMPs are designated as "Required" or "Recommended". BMPs that are required will be enforced through inspections, while recommended BMPs are intended to be educational.

### **SUPPORTING DOCUMENTS**

- A . Boiler Blowdown BMP Clean Version
- B . Boiler Blowdown BMP Redlined Version
- C . Cooling Towers BMP Clean Version
- D . Cooling Towers BMP Redlined Version
- E . Dry Cleaners BMP Clean Version
- F . Dry Cleaners BMP Redlined Version
- G . Managing FOG BMP Clean Version
- H . Managing FOG BMP Redlined Version
- I . Plumbers BMP Clean Version
- J . Plumbers BMP Redlined Version
- K . Sand-Oil Separator BMP Clean Version
- L . Sand-Oil Separator BMP Redlined Version
- M . Vehicle Repair BMP Clean Version
- N . Vehicle Repair BMP Redlined Version
- O . Water Softener BMP Clean Version
- P . Water Softener BMP Redlined Version
- Q . Winery and Brewery BMP Clean Version
- R . Winery and Brewery BMP Redlined Version

Napa Sanitation District: Approve

Reviewed By: Andrew Damron