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Outline	
Provide	Overview of major updates in OC San’s pretreatment program
Highlight	Regulatory drivers for updates
Preview	Future items requiring Board review and approval

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Background




**HUMAN
WASTEWATER**







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**INDUSTRIAL
WASTEWATER**



METALS


ORGANIC
CHEMICALS


CYANIDE

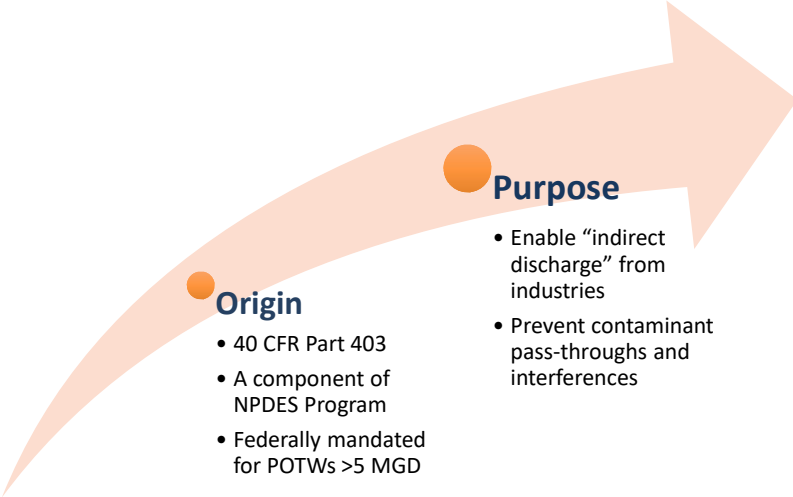

OILS AND
GREASE


PESTICIDES


SOLVENTS

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Program Overview




Origin

- 40 CFR Part 403
- A component of NPDES Program
- Federally mandated for POTWs >5 MGD

Purpose

- Enable “indirect discharge” from industries
- Prevent contaminant pass-throughs and interferences

**PRETREATMENT
PROGRAM**



**NO TOXICS
IN TOXIC AMOUNTS**

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Industrial Discharge to OC San



Diverse and large number of industries in service area



Approximately 12 percent of total flow

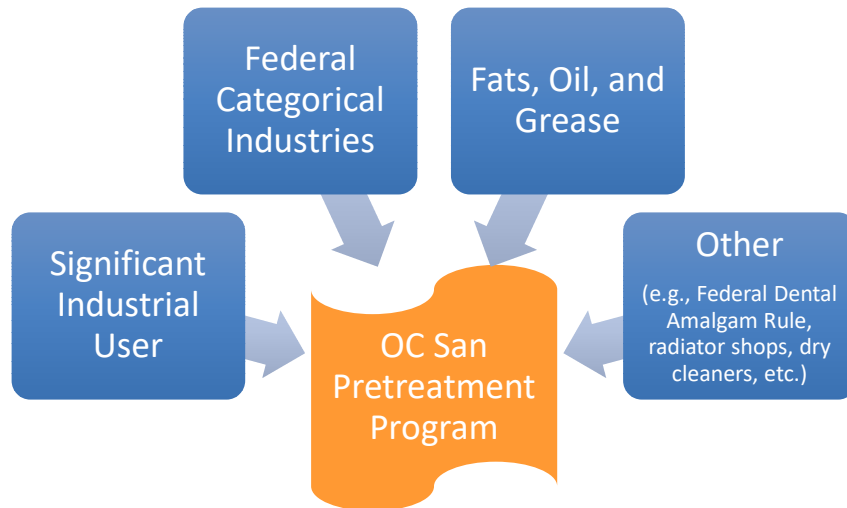


Over 500 facilities currently permitted



On-site treatment required before discharge

Program Components



Protecting Collection System

The diagram shows a dark blue sewer pipe system with several pollutants labeled around it. On the left, a yellow diamond-shaped warning sign with a flame icon is labeled 'FLAMMABLES' with wavy lines above it. Below it is a yellow thermometer icon labeled 'HIGH TEMPERATURE'. In the center, a green triangular warning sign with a skull and crossbones is labeled 'Toxic Chemicals'. Below it is a circular gauge icon labeled 'pH Extremes'. On the right, a pile of orange sand is labeled 'Sediment', and a blue frying pan with orange liquid is labeled 'Fats, Oil, and Grease'. The pipe system is shown in a U-shape with a horizontal section on the left and a vertical section on the right.

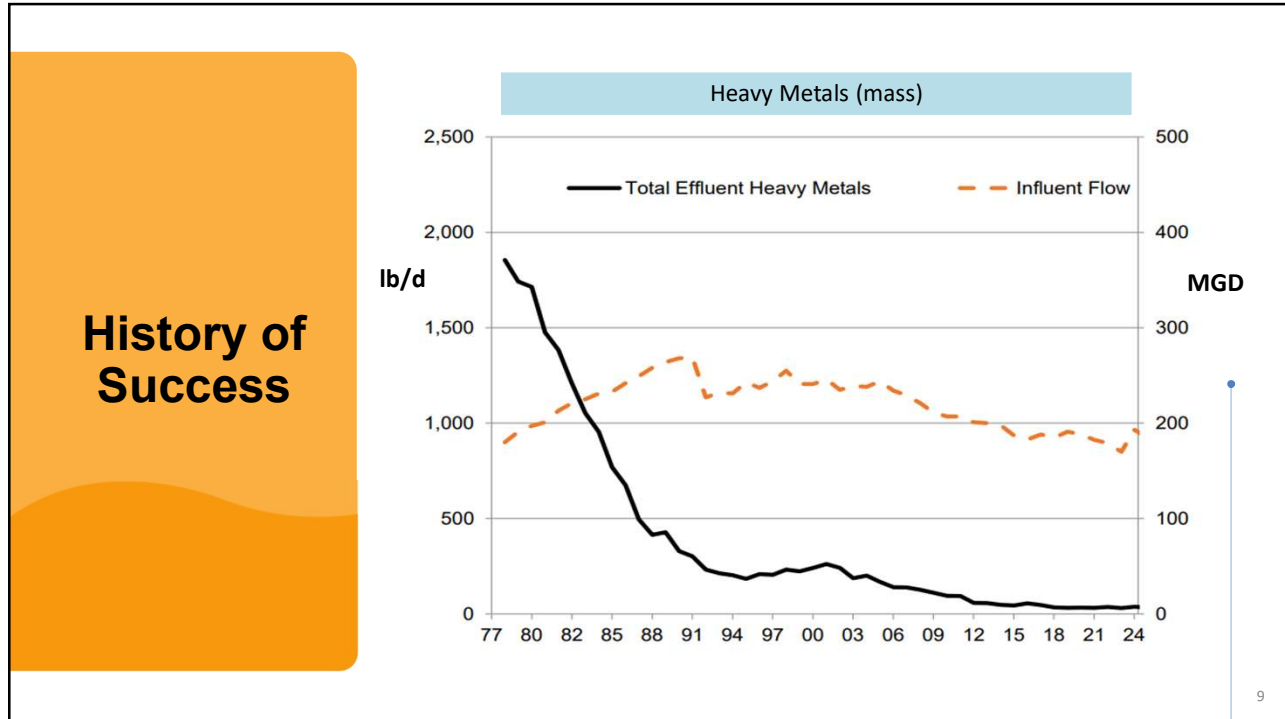
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Protecting Treatment System

Microorganisms are Key to Secondary Treatment

The diagram illustrates three wastewater treatment processes. On the left, a rectangular tank with a brown base and a horizontal line at the bottom is labeled 'ACTIVATED SLUDGE'. In the middle, a cylindrical tank with a brown base and a top cover with a central vertical pipe and a horizontal bar is labeled 'TRICKLING FILTER'. On the right, two cylindrical tanks with brown bases are labeled 'ANAEROBIC DIGESTERS'. An upward arrow from the right tank is labeled 'BIOGAS'. The text 'Microorganisms are Key to Secondary Treatment' is in a light yellow rounded rectangle on the left, and '...and to Biosolids' is on the right.

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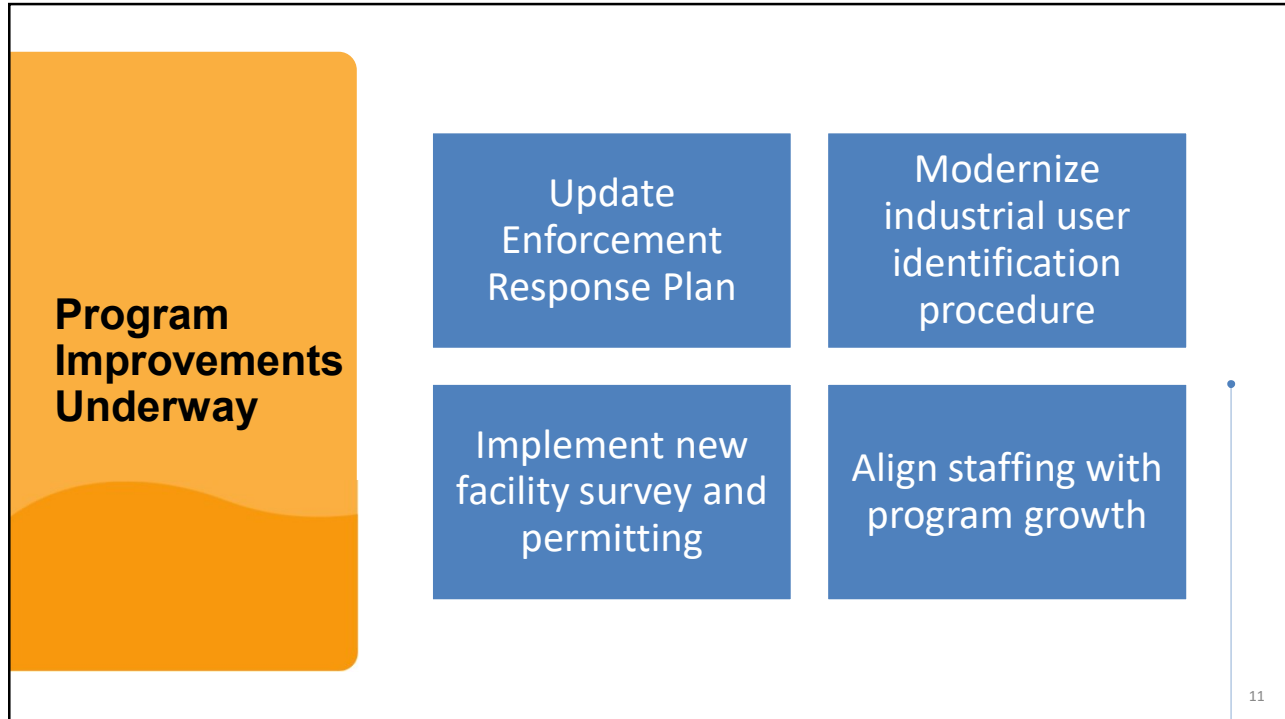


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Regulatory Drivers for Updates

- Program functions as extension of U.S. EPA authority
- Periodic EPA inspections
- Audit feedback drives comprehensive permitting

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Program Improvements Underway

- Update Enforcement Response Plan
- Modernize industrial user identification procedure
- Implement new facility survey and permitting
- Align staffing with program growth

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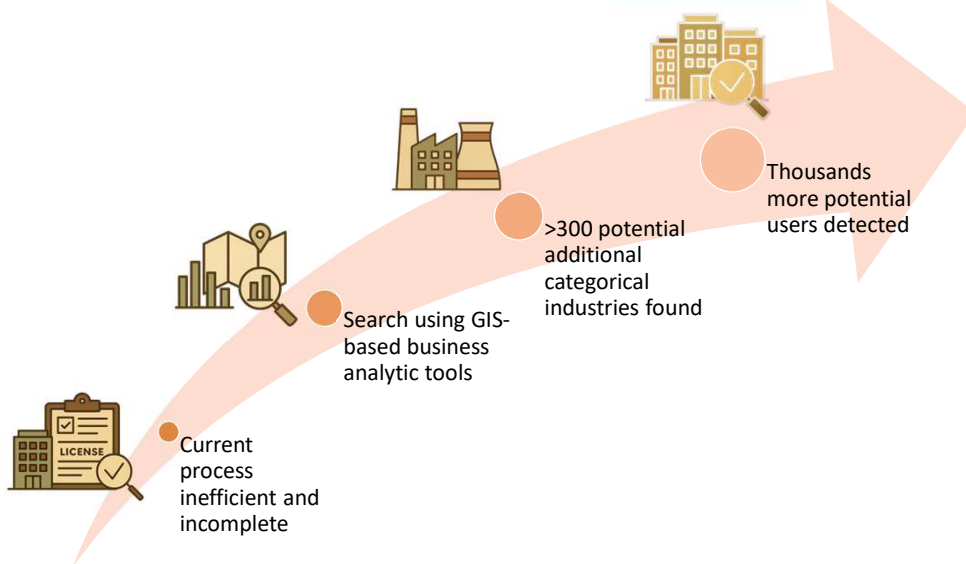
Enforcement Response Plan Update

- Compliance-first philosophy
- Align with federal and state enforcement policies
- Fair, firm, consistent, and transparent process
- Reasonable, sustainable, and defensible enforcement
- Updated ERP will require Board approval

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Modernizing Industrial User Identification



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Expand Industrial Facility Surveys



Survey newly identified facilities



Determine permit requirements



Ensure compliance with federal mandates



Ensure equity among dischargers and compliance with Prop. 218

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Staffing and Program Growth



Increased inspections, permitting, monitoring, sample analysis



Additional permit engineers, inspectors, laboratory scientists



Cost-neutral staffing level (cost borne by permit/user fees)

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Summary



Program evolving to meet regulatory requirements



Improvements: ERP, analytics, surveys



Plan ensures compliance and system protection



Future Board items

- Staffing
- ERP

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Recommendation

Informational Item.