

*Orange County
Sanitation District*

**Semi-Annual
Pretreatment Program
Report**

Resource Protection Division



**JULY - DECEMBER
Fiscal Year 2020/2021**



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March 29, 2021

Hope A. Smythe, Executive Officer
 California Regional Water Quality Control Board
 Santa Ana Region
 3737 Main Street, Suite 500
 Riverside, CA 92501-3339

**SUBJECT: Pretreatment Program Semi-Annual Report
 July 1 through December 31, 2020**

The Orange County Sanitation District (OC San) is submitting this semi-annual report for enforcement activities conducted during the period of July 1 through December 31, 2020. These activities include inspection and sampling of permittees, enforcement actions OC San has taken to remedy noncompliance, and information on the Santa Ana Watershed Project Authority pretreatment program under OC San's jurisdiction.

Appendix 1 of this report, entitled Monitoring and Compliance Status Report, contains the number of industrial inspections and the number of OC San and self-monitoring samples for each OC San Class I permittee for the first and second quarters of Fiscal Year 2020/21.

If you or your staff have any questions, please contact me at (714) 593-7437 or Adrian Siew at (714) 593-7164.

Roya Sohanaki
 Engineering Manager, Resource Protection Division

RS:aps

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c: EPA Region 9, CWA Compliance Office
 SWRCB Pretreatment Program Manager
 Submitted electronically to ciwqs.waterboards.ca.gov,
 R9pretreatment@epa.gov, and NPDES_Wastewater@waterboards.ca.gov

- Serving:
- Anaheim
- Brea
- Buena Park
- Cypress
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Los Alamitos
- Newport Beach
- Orange
- Placentia
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District

CERTIFICATION STATEMENT

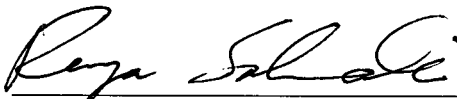
The following certification satisfies the reporting requirements under Section E, Order No. R8-2012-0035, for the Orange County Sanitation District's Pretreatment Requirements, NPDES Permit No. CA0110604, for the submittal of the attached Semi-Annual Report.

All reports shall be signed by either a principal executive officer or ranking elected or appointed official or a duly authorized representative of a principal executive officer or ranking elected or appointed official. A duly authorized representative of a principal executive officer or ranking elected or appointed official may sign the reports only if:

- a. The authorization is made in writing by a principal executive officer or ranking elected or appointed official;
- b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
- c. The written authorization is submitted to the Regional Board and EPA.

Each person signing a report required by this permit or other information requested by the Regional Board or EPA shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Roya Sohanaki
Engineering Manager, Resource Protection Division

03/29/2021

Date

TABLE OF CONTENTS

	Page
1.0 PERMITS AND CERTIFICATIONS	1-1
1.1 Introduction	1-1
1.2 Class I Permits	1-1
1.3 Class II Permits	1-1
1.4 Wastehauler Permits	1-1
1.5 Special Purpose Discharge Permits	1-2
1.6 Urban Runoff Permits	1-2
1.7 FOG (Fats, Oil, and Grease) Permits	1-2
1.8 Discharge Certifications	1-2
1.9 Summary of Permits and Certifications in Effect	1-3
2.0 ENFORCEMENT ACTIVITIES	2-1
2.1 Introduction	2-1
2.2 Compliance Inspections	2-1
2.3 Compliance Meetings	2-1
2.4 Compliance Requirement Letters	2-1
2.5 Order to Cease/Terminate Non-Compliance/Discharge	2-2
2.6 Notices of Violation	2-2
2.7 Probation Orders	2-2
2.8 Enforcement Compliance Schedule Agreement (ECSA)	2-2
2.9 Regulatory Compliance Schedule Agreement (RCSA)	2-2
2.10 Administrative Penalties	2-3
2.11 Permit Suspension	2-3
2.12 Permit Revocation	2-3
2.13 Emergency Suspension Order	2-3
2.14 Civil/Criminal Complaints	2-4
2.15 Industries with Discharge Violations	2.4
2.16 Enforcement – Summary by Permittee	2-7
3.0 SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA)	3-1
3.1 Brine Line System Pretreatment Program Overview	3-1
3.2 SAWPA Pretreatment Program	3-2

TABLE OF CONTENTS (Continued)

	Page
3.2.1 The City of Beaumont (Beaumont)	3-2
3.2.2 Eastern Municipal Water District (EMWD)	3-2
3.2.3 Inland Empire Utilities Agency (IEUA)	3-3
3.2.4 Jurupa Community Services District (JCSD)	3-4
3.2.5 San Bernardino Municipal Water Department (SBMWD)	3-4
3.2.6 San Bernardino Valley Municipal Water District (Valley District)	3-5
3.2.7 Santa Ana Watershed Project Authority (SAWPA)	3-6
3.2.8 SAWPA Liquid Waste Hauler (LWH) Program)	3-6
3.2.9 Western Municipal Water District (Western)	3-7
3.2.10 Yucaipa Valley Water District (YVWD)	3-8
3.3 Permittees in Significant Noncompliance (SNC)	3-9
3.4 Future Projects that will Affect Quantity of Discharge to the Brine Line System	3-10
3.5 SAWPA Special Projects	3-10
3.6 Brine Wastewater Effluent Characteristics at OC San’s SARI Metering Station (SMS)	3-11

LIST OF TABLES

Table 1.1	Active Permits and Certifications July 1 - December 31, 2020	1-3
Table 2.1	Industries with Discharge Violations July 1 – December 31, 2020	2-4
Table 3.1	Summary of SAWPA and Member/Contract Agency Permittees in Significant Noncompliance (SNC), July 1 – December 31, 2020	3-10
Table 3.2	SAWPA Daily Average Concentration (mg/L) and Mass (lb/day) Measured from Weekly Sampling at OC San’s SARI Metering Station, July – September 2020	3-12
Table 3.3	SAWPA Daily Average Concentration (mg/L) and Mass (lbs/day) Measured from Weekly Sampling at OC San’s SARI Metering Station, October – December 2020	3-13

LIST OF APPENDICES

Appendix 1	Monitoring and Compliance Status Report
Appendix 2	SAWPA Monitoring and Compliance Status Report

LIST OF ABBREVIATIONS

BOD	Biochemical Oxygen Demand
CBMWD	Chino Basin Municipal Water District
CIP	Clean in Place
CIUs	Categorical Industrial Users
CTS	Continuous Treatment System
CWEA	California Water Environmental Association
ECSA	Enforcement compliance Schedule Agreements
EMWD	Eastern Municipal Water District
EPA	Environmental Protection Agency
FCS	Federal Categorical Standard
FOG	Fats, Oils, and Grease
FSEs	Food Service Establishments
FVM	Fluvoxamine
IEUA	Inland Empire Utilities Agency
IPA	Isopropyl Alcohol
IUs	Industrial User
JCSD	Jurupa Community Service District
JPA	Joint Powers Authority
LWH	Liquid Waste Haulers
LWHCMP	Liquid Waste Hauler Cleaning and Maintenance Plan
MAS	Maintenance Access Structure
MGD	Million Gallons per Day
MOUs	Memorandums of Understanding
NAICS	North American Industry Classification System
NOV	Notice of Violation
OCA	Order for Corrective Action
OC San	Orange County Sanitation District
OCWD	Orange County Water District
ORP	Oxidation Reduction Potential
POTW	Publicly Owned Treatment Works
RCSA	Regulatory Compliance Schedule Agreement
RO	Reverse Osmosis
ROW	Right of Way
SAWPA	Santa Ana Watershed Project Authority
SBMWD	San Bernardino Municipal Water Department
SIUs	Significant Industrial Users
SLCP	Slug Load Control Plan
SMS	SARI Metering Station
SNC	Significant Noncompliance
SSOs	Sanitary Sewer Overflows
TRC	Technical Review Criteria
TSS	Total Suspended Solids
YVWD	Yucaipa Valley Water District

chapter 1

PERMITS AND CERTIFICATIONS

1.0 PERMITS AND CERTIFICATION

1.1 Introduction

Orange County Sanitation District (OC San) industrial wastewater discharge permits and certifications provide the means to limit the discharge of specific pollutants from industrial facilities and to establish a pollutant inventory from industrial dischargers. The following sections describe the types and quantities of OC San permits issued and deactivated for the period July 1, 2020 through December 31, 2020.

There are seven permit & certification classifications for users that are administrated by OC San's Pretreatment Program: Class I Permits, Class II Permits, Wastehauler Discharge Permits, Special Purpose Discharge Permits, Dry Weather Urban Runoff Discharge Permits, Fats/Oil/Grease (FOG) Permits, and Discharge Certifications.

1.2 Class I Permits

During this reporting period, eight (8) new permits were issued, and six (6) permits were deactivated for those users who:

- a. are subject to Federal Categorical Pretreatment Standards; or
- b. average 25,000 gallons per day or more of regulated process wastewater; or
- c. have been determined by the General Manager to have a reasonable potential for adversely affecting OC San's operation or for violating any pretreatment standard, local limit, or discharge requirement; or
- d. may cause, as determined by the General Manager, pass-through or interference with OC San sewerage facilities.

1.3 Class II Permits

During this reporting period, no new permits were issued, and no permits deactivated for those users who:

- a. have a charge for use greater than the ad valorem tax basic levy allocated to OC San, and
- b. discharge waste other than sanitary, and
- c. are not otherwise required to obtain a Class I Permit.

1.4 Wastehauler Permits

During this reporting period, three (3) new permits were issued for those users who are engaged in vehicular transport and disposal of acceptable domestic waste into OC San's wastehauler station.

1.5 Special Purpose Discharge Permits

During this reporting period, eight (8) new permits were issued and six (6) permits were deactivated for those users who discharge groundwater, subsurface drainage, unpolluted water, or other wastewater to OC San's system. This permit is granted when no alternative method of disposal is reasonably available or to mitigate an environmental risk or a health hazard.

1.6 Urban Runoff Permits

OC San accepts the diversion of urban runoff to the sewer for treatment to remediate various public health and environmental problems which are infeasible to economically or practically control through traditional stormwater best management practices. Originally established to protect and improve the recreational waters along Orange County's coastal shoreline from bacterial pollution, the role of the Dry Weather Urban Runoff Program has expanded to include the mediation of selenium-laden waters reaching the Upper Newport Bay.

The Resource Protection Division administers the Urban Runoff Diversion Program through the issuance of a discharge permit for each of the diversion structures. The permit establishes discharge limits, constituent monitoring, and flow metering requirements, as well as provides guidelines that specifically prohibit storm runoff and authorizes discharge only during periods of dry weather. OC San also conducts quarterly sampling and analysis of the urban runoff discharges to ensure discharge limit compliance with the various regulated constituents.

There are currently twenty-one (21) active Urban Runoff diversions under permit; three (3) owned and operated by the County of Orange, eleven (11) owned and operated by the City of Huntington Beach, three (3) owned and operated by the Irvine Ranch Water District, three (3) owned and operated by the City of Newport Beach, and one (1) owned and operated by PH Finance (present owner of the Pelican Hill Resort). There were no new diversions added to the Urban Runoff Diversion Program during this reporting period.

1.7 FOG (Fats, Oil, and Grease) Permits

OC San's Resource Protection Division facilitated the effort to develop a regional FOG Control Program to regulate the quantity and quality of FOG-laden wastewater that is discharged into the sewerage system from food service establishments (FSEs). OC San currently manages the FOG control program for 38 FSEs that discharge directly into OC San owned trunklines in the City of Orange.

During this reporting period, there were no FOG permits renewed, and one (1) FOG permittee was deactivated. No new FSEs were identified in OC San's direct service area.

1.8 Discharge Certifications

During this reporting period, no new Discharge Certifications were issued, and one (1) was deactivated. One (1) new Zero Discharge Certification was issued, and five (5) deactivated for those industries that have operations subject to a federal category regulated by the EPA, but do not discharge industrial wastewater generated from these operations to the sewer.

1.9 Summary of Permits and Certifications in Effect

A summary of permit and certification activity during the July 1 through December 31, 2020 period, is shown in TABLE 1.1.

TABLE 1.1 Active Permits And Certifications July 1 - December 31, 2020 Orange County Sanitation District, Resource Protection Division			
Permit / Certification Type	New Issuance	Deactivated	Effective During Reporting Period
Class I (SIU)	8	6	334
<i>Class I Categorical (CIU)</i>	3	3	179
<i>Class I Non-Categorical</i>	5	3	155
Class II	0	0	19
Wastehauler	3	0	43
Special Purpose	8	6	50
Urban Runoff	0	0	21
FOG	0	1	38
Discharge Certification	0	1	1
Zero Discharge Certification	1	5	33
TOTAL	20	19	539

chapter 2

ENFORCEMENT

2.0 ENFORCEMENT

2.1 Introduction

The goal of the Orange County Sanitation District's (OC San) industrial wastewater enforcement program is to bring its permitted industrial users into compliance with OC San's *Wastewater Discharge Regulations* (Ordinance) terms, conditions, and limits, and to control and reduce industrial pollutants. In addition to assessing noncompliance fees, issuing Notices of Violation, and sending compliance letters, other types of enforcement actions are conducted for industrial violators when appropriate. These actions include compliance requirements, compliance inspections, compliance meetings, Probation Orders, Enforcement Compliance Schedule Agreements (ECSAs), Regulatory Compliance Schedule Agreements (RCSAs), Administrative Penalties, Permit Suspension, Permit Revocation, and Emergency Suspension Orders.

This report describes the enforcement actions that OC San initiated or continued against noncompliant permittees for the semi-annual reporting period of July 1, 2020 through December 31, 2020.

Appendix 1 of this report, entitled Monitoring and Compliance Status Report, contains information regarding the number of industrial inspections and the number of OC San and self-monitoring samples taken for each Class I permittee for the first and second quarters of Fiscal Year 2020/21. Each permittee's name, permit number, and address are given in the first three columns. Additional columns present the North American Industry Classification System (NAICS) code, applicable pretreatment regulation, the number of performed inspections, the number of completed samples, the pollutant(s) in discharge violations, and other applicable comments, including name changes and permit issuances/deactivations.

2.2 Compliance Inspections

When a permittee is determined to be violating discharge limits, an engineer and an inspector conduct special inspections to identify and assess the noncompliance issues, require corrective actions, and monitor the progress of those permittees operating under the terms and conditions of ECSAs/RCSAs.

Fourteen (14) compliance inspections were conducted during the first and second quarters.

2.3 Compliance Meetings

Compliance meetings are called because of a permittee's failure to achieve compliance with permit and/or Ordinance discharge, record-keeping, or other requirements. The meetings are held with OC San staff to discuss issues and proposed solutions.

Eleven (11) compliance meetings were conducted during the first and second quarters.

2.4 Compliance Requirement Letters

Compliance requirement letters are issued to require a permittee to comply with a specific condition of the permit and/or Ordinance, or to notify the permittee of an enforcement in accordance with the Enforcement Response Plan, such as a compliance meeting.

Thirty (30) compliance requirement letters were issued during the first and second quarters.

2.5 Order to Cease/Terminate Non-Compliance/Discharge

Orders are issued where a permittee is continually non-compliant or has committed one or more significant violations of the permit and/or Ordinance. The Order requires a permittee to comply with a specific condition of the permit and/or Ordinance and may notify the permittee of escalated enforcement in accordance with the Enforcement Response Plan, such as a compliance meeting.

Seven (7) orders to cease/terminate non-compliance/discharge were issued during the first and second quarters.

2.6 Notices of Violation

A Notice of Violation (NOV) is a written notification from OC San that references findings from recent sampling programs and indicates that specific violations of the permittees' discharge limits have occurred. The NOV is usually accompanied by non-compliance sampling and/or processing fees. The NOV instructs the permittee to take immediate action to correct the problem.

Fifty-nine (59) Notices of Violation were issued in the first and second quarters.

2.7 Probation Orders

Pursuant to Section 603.1 of OC San's Ordinance, a Probation Order may be issued if a permittee has violated any terms, conditions, or limits of its discharge permit or OC San's Ordinance or has not paid all amounts owed to OC San. The term of the Probation Order may not exceed 90 days and the permittee is required to comply with all directives, conditions, or requirements within the time specified.

Three (3) Probation Order was issued in the first and second quarters.

2.8 Enforcement Compliance Schedule Agreement (ECSA)

If a permittee is in noncompliance with the terms, conditions, or limits specified in the permit or the Ordinance and needs to construct and/or acquire and install equipment related to pretreatment, OC San may require the permittee to enter into an ECSA. The ECSA contains terms and conditions by which the permittee must operate and specifies dates for construction and/or acquiring and installing the pretreatment equipment and achieving compliance.

There were no ECSAs issued during the first and second quarters.

2.9 Regulatory Compliance Schedule Agreement (RCSA)

Subsequent to the issuance of an Industrial Wastewater Discharge Permit to an industrial user, federal Categorical Pretreatment Standards may be adopted or revised by the EPA, or OC San may enact revised discharge limits. If the General Manager determines that a permittee would not be in compliance with the newly adopted or revised limits, the permittee may be required to enter into a RCSA with OC San. The terms and conditions of a RCSA require the permittee to achieve compliance with all new standards by a specific date. RCSAs have a maximum term of two-hundred seventy (270) days.

The issuance of a RCSA may contain terms and conditions including, but not limited to, requirements for installation of pretreatment equipment and facilities, submittal of drawings or reports, waste minimization practices, or other provisions to ensure compliance with OC San's Ordinance. While the

RCSA is in effect, any discharge by the permittee in violation of the RCSA will require payment of non-compliance sampling fees in accordance with Article 6 of OC San's Ordinance.

There were no RCSAs issued during the first and second quarters.

2.10 Administrative Penalties

Pursuant to the authority of California Government Code Section 54740.5, OC San may issue an Administrative Complaint against the responsible officer or owner of any permittee that violates any permit condition or effluent limit.

There were no Administrative Penalties issued during the first and second quarters.

2.11 Permit Suspension

OC San staff may seek permit suspension if a permittee fails to comply with the terms and conditions of an ECSA, RCSA, or Probation Order; fails to provide reports; or violates any condition or limit of a discharge permit or Ordinance provision. When OC San believes that grounds exist for permit suspension, the permittee is notified in writing of the reasons for permit suspension and the date of the permit suspension hearing.

At the hearing, OC San staff and the permittee are provided the opportunity to present their evidence to the Hearing Officer. After the hearing, a written determination is made and upon order of suspension the permittee must cease discharge to the sewer for the duration of the suspension.

No permit suspensions were ordered during the first and second quarters.

2.12 Permit Revocation

OC San staff may seek permit revocation if a permittee fails to comply with the terms and conditions of an ECSA, RCSA, or Probation Order; fails to provide reports; or violates any condition or limit of a discharge permit or Ordinance provision. When OC San believes that grounds exist for permit revocation, the permittee is notified in writing of the reasons for permit revocation and the date of the permit revocation hearing.

At the hearing, OC San staff and the permittee are provided the opportunity to present their evidence to the Hearing Officer. After the hearing, a written determination is made and upon order of revocation the permittee must permanently terminate discharge to the sewer and the permit is no longer active.

No permit revocations were ordered during the first and second quarters.

2.13 Emergency Suspension Order

Pursuant to Section 614 of OC San's Ordinance, an Emergency Suspension Order may be ordered to stop an actual or impending discharge that presents or may present an imminent or substantial endangerment to the health and welfare of persons or to the environment; may cause interference to OC San's sewerage facilities; or may cause OC San to violate any state or federal law or regulation.

No Emergency Suspension Orders were issued during the first and second quarters.

2.14 Civil/Criminal Complaints

When a permittee intentionally or negligently violates any provision of the Ordinance, permit conditions, or discharge limits, OC San may petition to the Superior Court for the issuance of a preliminary or permanent restraining order. In addition, OC San can petition the Court to impose, assess, and recover civil penalties for each day that violation occurs or seek criminal penalties for illegal disposal in accordance with OC San's Ordinance.

No civil/criminal complaints were made during the first and second quarters.

2.15 Industries with Discharge Violations

The table below lists those facilities with discharge violations between July 1st – December 31st, 2020, and whether the violation(s) exceeded Federal Categorical Standard (FCS) Limits, OC San Local Limits, or both.

TABLE 2.1 Industries with Discharge Violations July 1 - December 31, 2020 Orange County Sanitation District, Resource Protection Division					
Facility	Permit No.	Pollutant(s) in Violation	Date	Exceeded Federal Categorical Limit	Exceeded Local Limit
Alloy Die Casting Co.	1-531437	Zinc	10-21-2020	✓	-
			Oct-2020	✓	-
Aluminum Precision Products, Inc. (Warner)	1-511387	O&G min.	10-29-2020	✓	-
			Oct-2020	✓	-
Anchen Pharmaceuticals, Inc. (Goodyear)	1-600359	pH	08-19-2020	-	✓
APCT Orange County	1-600503	Copper	11-06-2020	-	✓
			Nov-2020	✓	-
Avid Bioservices, Inc.	1-571332	acetone	12-02-2020	✓	-
Brindle/Thomas - Catalina & Copeland	1-531430	O&G min.	12-08-2020	-	✓
Catalina Cylinders, A Div. of APP	1-031021	O&G min.	07-09-2020	✓	-
Coast to Coast Circuits, Inc.	1-111129	Copper	08-13-2020	-	✓
			Aug-2020	✓	-
Columbine Associates	1-521784	O&G min.	08-06-2020	-	✓

**TABLE 2.1 Industries with Discharge Violations July 1 - December 31, 2020
Orange County Sanitation District, Resource Protection Division**

Facility	Permit No.	Pollutant(s) in Violation	Date	Exceeded Federal Categorical Limit	Exceeded Local Limit
Continuous Coating Corporation	1-021290	Zinc	Sep-2020	✓	-
Cooper and Brain, Inc.	1-031070	O&G min.	11-10-2020	-	✓
Corru-Kraft Buena Park	1-600806	pH	07-14-2020	-	✓
Data Electronic Services, Inc.	1-011142	Copper	10-21-2020	-	✓
			12-03-2020	-	✓
			Dec-2020	✓	-
			Oct-2020	✓	-
Diamond Environmental Services, LP	1-600244	pH	07-29-2020	-	✓
Dr. Smoothie Enterprises - DBA Revolution Group	1-600131	pH	10-12-2020	-	✓
			11-18-2020	-	✓
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	Cadmium	Aug-2020	✓	-
			Jul-2020	✓	-
			Oct-2020	✓	-
Electronic Precision Specialties, Inc.	1-021337	Nickel	Oct-2020	✓	-
Golden State Pumping LLC	1-600975	pH	08-03-2020	-	✓
			08-04-2020	-	✓
			09-02-2020	-	✓
			10-28-2020	-	✓
LM Chrome Corporation	1-511361	CN	Oct-2020	✓	-
Meggitt (Orange County), Inc.	1-601115	Lead	11-20-2020	✓	-
			12-03-2020	✓	-
			Dec-2020	✓	-
			Nov-2020	✓	-
		Silver	Nov-2020	✓	-
Micrometals, Inc.	1-021153	pH	07-28-2020	-	✓
Newlight Technologies, Inc.	1-600888	Copper	12-22-2020	-	✓

**TABLE 2.1 Industries with Discharge Violations July 1 - December 31, 2020
Orange County Sanitation District, Resource Protection Division**

Facility	Permit No.	Pollutant(s) in Violation	Date	Exceeded Federal Categorical Limit	Exceeded Local Limit
Nor-Cal Beverage Co., Inc. (NCB)	1-021283	pH	11-09-2020	-	✓
			11-10-2020	-	✓
Omni Metal Finishing, Inc. (Building 4)	1-600981	Cadmium	10-06-2020	✓	-
			Oct-2020	✓	-
Performance Powder, Inc.	1-521805	Zinc	Oct-2020	✓	-
Q-Flex Inc.	1-600337	Silver	09-22-2020	✓	-
			Sep-2020	✓	-
Quality Aluminum Forge, LLC (Cypress South)	1-600272	pH	08-14-2020	-	✓
Republic Waste Services of So. Cal., LLC	1-021169	pH	09-09-2020	-	✓
			09-10-2020	-	✓
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	Cadmium	11-06-2020	✓	-
			12-23-2020	✓	-
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	O&G min.	07-27-2020	-	✓
			10-22-2020	-	✓
Superior Plating	1-021090	CN	Aug-2020	✓	-
TTM Technologies North America, LLC. (Coronado)	1-521859	Copper	12-03-2020	✓	✓
			Dec-2020	✓	-

Note:

Violations with only the month indicated are monthly discharge violations.

2.16 Enforcement – Summary by Permittee

This section summarizes various enforcement actions conducted for permittees in the first half of FY 2020/21. Potential enforcement actions include permit revocations, permit suspensions, compliance inspections, compliance meetings, probation orders, enforcement compliance schedule agreements (ECSA), orders to cease, among others.

Active Plating, Inc. (Permit No. 1-011115)

Active Plating, Inc. (Active Plating) is a job shop metal finishing facility. Active Plating performs zinc plating with clear and gold chromate conversion coating on steel, and chemfilm operations on aluminum parts. Parts are generally used in electronics or computer applications. Wastewater is segregated between hexavalent chrome bearing operations and other metal-bearing/alkaline wastestreams. Pretreatment consists of chromium reduction, hydroxide precipitation, with settling and flocculation in two parallel clarification tanks. Active Plating has pH and ORP probes connected to an advanced programmable logic controller which automates the treatment system.

In April 2020, OC San entered into a Settlement Agreement with Active Plating in lieu of issuing an Administrative Complaint to settle the charges associated with Active Plating's 2018 zinc violations, chronic failure to submit self-monitoring reports, and sample tampering observed in September 2019. In May 2020, OC San issued a Compliance Requirements Letter directing Active Plating to attend a compliance meeting to discuss Active Plating's failure to submit payment of the agreed upon \$7,000 settlement charges and the written documentation for the facility's wastewater treatment operator's qualifications and certification. In May 2020, OC San issued an Order to Cease Noncompliance for reporting. In June 2020, Active Plating sent the payment but not the required operator documentation. As a result, OC San held a Compliance Meeting with Active Plating during which the company stated that it is still working on getting its operators certified and that four operators have already been enrolled to the CWEA's Industrial Wastewater Treatment Plant Certification for the Fall of 2020.

July 1 – December 31, 2020

Active Plating is expected to complete obtaining qualified operators in accordance with the Settlement Agreement by the end of 2020. OC San will evaluate Active Plating's compliance with this requirement during the next reporting period.

Advance Tech Plating, Inc. (Permit No. 1-021389)

Advance Tech Plating, Inc. (ATP) is a job shop metal finishing facility. The facility performs anodizing and passivation on steel, aluminum, and some copper/brass parts. Operations at ATP start with precleaning and etching, then deoxidizing with muriatic acid and anodizing with sulfuric acid, followed by chem filming and dye coloring per customer specification. To protect the dyed surface, the parts are dipped in a clear anoseal followed by final rinsing and drying. Most of the wastewater is generated from the rinsing operations. ATP operates a continuous and a batch pretreatment system which consists of chrome reduction, pH adjustment, flocculation, metal precipitation and clarification. ATP utilizes a filter press for sludge dewatering.

In May 2019, ATP had pH violations, as well as major zinc, copper, and nickel daily and monthly average discharge limit violations. OC San issued ATP an Order to Cease Noncompliant Discharges due to the severity of the violations. OC San also conducted a Compliance Inspection during which ATP was directed to stop noncompliant discharges and determine the cause of the violations. ATP submitted a response letter indicating that a clogged discharge tube on the sodium hydroxide metering pump led to a low pH and, hence, incomplete treatment of metals. ATP's corrective actions included installation of a low pH alarm and a recirculation line, which would allow ATP to recirculate noncompliant

wastewater back into the treatment tanks. In June 2019, OC San issued a Compliance Requirement Letter directing ATP to attend a Compliance Meeting to discuss the violations. During the Compliance Meeting, ATP was directed to take the following additional corrective measures: automating the low pH recirculation line with, employing a qualified operator present during all discharge hours, maintaining the pretreatment tanks, good housekeeping, and performing a hydraulic evaluation of the pretreatment system.

In July 2019, OC San issued a Compliance Requirements Letter requiring ATP to have a qualified operator present during all discharge hours, maintain the pretreatment tanks, ensure good housekeeping, and perform a hydraulic evaluation of the pretreatment system. In August 2019, ATP had multiple major zinc violations. In September 2019, OC San conducted a Compliance Inspection during which ATP attributed the violations to malfunctioning pH and ORP controllers. The malfunction was due to an issue with the grounding of the controller which was immediately fixed upon discovery. OC San once more emphasized the importance of installation of pH alarm and automatic controller to prevent future violations and required ATP to record and maintain a batch treatment log on site. ATP also mentioned that due to lack of a qualified operator on the second shift, the facility plans to operate the continuous pretreatment system only during the first shift. During the second shift, all generated industrial wastewater is to be routed to the batch treatment tank. The operator then treats the batch the following day and will gradually bleed the treated wastewater to the continuous system. In October 2019, OC San confirmed the installation of a low/high pH alarm and automatic controller. At OC San's direction, ATP conducted multi-day self-monitoring to verify compliance after the installation, and the results showed compliance. OC San increased the frequency of ATP's heavy metals self-monitoring frequency from monthly to weekly starting in December 2019.

July 1 – December 31, 2020

On **October 22, 2020**, ATP was published in the newspaper as Significantly Non-Compliant for the FY2019-2020 reporting period due to its August 2019 acute zinc discharge violation.

ATP had no further violations during this reporting period. OC San will continue to monitor ATP's discharge and compliance status on a quarterly basis.

Alliance Medical Products, Inc. (Permit No. 1-541182)

Alliance Medical Products, Inc. (Alliance) is a manufacturer of medical surgical devices along with aqueous and injectable drugs which are produced under aseptic conditions. Medical devices include corneal storage media, ocular implants, and other clinical products. Other manufactured items include medical delivery devices, sterile ointments and gels, as well as several clinical products that are considered combination products by the FDA. Wastewater is generated from the aseptic sterile filling process, cleaning of glassware in the labs, production of steam for the autoclaves, rinsing and cleaning of manufacturing equipment and tooling, and surplus injection water not utilized during a production run. The wastewater is discharged to the sewer without any form of pretreatment.

In June 2019, Alliance had a pH violation. In August 2019, OC San conducted a Compliance Inspection during which Alliance indicated that the source of the violation is the Clean in Place (CIP) process. The current process at Alliance uses a Jensen CIP system, which operates on a selector switch scheme. Alliance determined that an operator selected the wrong position on the drain switch and incorrectly diverted low pH rinse water to the drain. Alliance submitted a corrective action letter, which included implementation of a new batch process where all CIP wastewaters will be discharged to a waste drum and tested for pH and will be discharged to the drain only if the wastewater is within an allowable pH range. During the investigation of the probable source of the pH violation, OC San instructed Alliance to prepare a plumbing plan of the facility to determine all the wastewater discharge points. As a result of this study, it was determined that Alliance's sample point is not representative of the discharge at the facility. OC San continued to conduct multiple inspections and meetings with Alliance to refine the plumbing study and correct any missing items on the plumbing plan to determine an appropriate path

forward. In June 2020, OC San issued a Compliance Requirements Letter directing Alliance to eliminate any bypasses and install the proposed solution by the next reporting period.

July 1 – December 31, 2020

On **July 27, 2020**, Alliance submitted their proposal to eliminate the on-site bypasses in response to the compliance letter that was issued in June 2020. Due to pending review with the City of Irvine, Alliance requested an extension, which was granted to complete the project by **December 11, 2020**. On **October 23, 2020**, Alliance requested a second extension due to further issues with the City of Irvine's plan approval.

OC San will continue to monitor Alliance's progress and compliance status during the next reporting period.

Allied International (Permit No. 1-031107)

Allied manufactures water-based floor finishers and specialty cleaners for distribution and sales by various independent contractors. The processes include dry blending (from which there is no wastewater discharge) and wet blending. The dry blending process is located inside the building, where dry powders are blended to produce Allied's industrial cleaners. Wet blending is accomplished in four mixing tanks at the rear of the building. Products include floor cleaners, waxes, strippers, cleaners, degreasers, sanitizers, disinfectants, and soaps. Allied's treatment system consists of an underground three-stage clarifier with manual pH adjustment using pH strips and addition of granulated citric acid.

In January 2020, Allied had a zinc violation. During routine sampling in February 2020, OC San verified the installation of an automated pH adjustment system, which had been required after previous pH non-compliant discharges to replace manual addition of treatment chemical. Allied had determined that the zinc violation resulted from the temporary use of a holding tank formerly used in manufacturing a floor cleaner that contained zinc (which is no longer manufactured by Allied), to collect and store wastewater while the pH adjustment system was being installed. Allied removed the holding tank from the manufacturing and pretreatment area and discontinued its use.

July 1 – December 31, 2020

On **October 22, 2020**, Allied was published in the newspaper as Significantly Non-Compliant for the FY2019-2020 reporting period due to its January 2020 acute zinc discharge violation.

Allied had no further violations during this reporting period. OC San will continue to monitor Allied's discharge and compliance status on a quarterly basis.

Alloy Die Casting Co. (Permit No. 1-531437)

Alloy Die Casting Co. (Alloy Die) is a non-ferrous metal former that manufactures diecast parts to customer's specifications from aluminum and zinc alloys. Molten metal is injected into a steel die cavity at a controlled temperature under high pressure. Once the metal part is cooled and has reached sufficient rigidity, the mold opens up and the part is ejected. After casting, the part will undergo manual pneumatic grinding or belt sanding, followed by wet deburring to clean, de-flash, and/or provide a surface finish. Alloy Die uses two batch treatment systems, both of which perform pH adjustment and metals removal through flocculation, while one performs oil & grease removal as well. The treated metal-bearing wastestream passes through a filter press, from which the filtrate is discharged to the sewer. The oil & grease wastestream is sent through an oil/water separator, from which the separated water is sent to the other batch treatment tank and the separated oil & grease is wastehauled.

In May 2020, Alloy Die had a zinc violation, which also resulted in a monthly average discharge limit violation. Alloy Die noted increased production of zinc dies during the time of the violation. Alloy Die stated they had introduced in-situ zinc testing prior to each batch discharge to verify compliance with the zinc discharge limits.

July 1 – December 31, 2020

On **August 6, 2020**, OC San issued a Notice of Violation for the May 2020 zinc monthly limit exceedance. On **October 21, 2020**, Alloy Die had another zinc violation, for which a Notice of Violation was issued on **November 5, 2020**. This daily limit exceedance also resulted in a zinc monthly average discharge limit violation for the month of **October 2020**. Alloy Die again noted increased production during this sampling event. Alloy Die was re-informed of the method to calculate the daily production rate based on zinc concentration and volume.

OC San will issue a Notice of Violation for the October 2020 zinc monthly limit exceedance during the next reporting period. OC San will evaluate Alloy Die's production values with regard to the permitted mass allocations during the next reporting period and continue to monitor Alloy Die's discharge and compliance status.

Aluminum Precision Products, Inc. - Warner (Permit No. 1-511387)

Aluminum Precision Products (Warner) manufactures parts for the aerospace, automotive, commercial, military/defense, recreational, and transportation industries. Aluminum Precision's process consist of cutting of aluminum stock, pre-heating, hand forging into long rectangles, formed into the appropriate size, heat treatment, quenching, ageing, and ultrasonic testing where water is discharged as needed to the sewer. Wastewater is generated from the quenching operations and is discharged in a batch process without pretreatment.

July 1 – December 31, 2020

On **October 29, 2020**, Aluminum Precision had an oil & grease violation, for which a Notice of Violation was issued on **November 12, 2020**. This daily limit exceedance also resulted in an oil & grease monthly average discharge limit violation for the month of **October 2020**. On **December 25, 2020**, Aluminum Precision submitted a root cause analysis and a Corrective Action Report along with wastewater disposal training records. Aluminum Precision attributed the violation to erroneous dumping of slug wastes into the effluent batch treatment tank. The company installed a 3' x 5' hinged lid on the sample point. This lid is locked, and only authorized operators have the key. The company also facilitated a wastewater training to instruct employees how to dispose of oily wastewater, and which wastes can and cannot be discharged.

OC San will issue a Notice of Violation for the October oil & grease monthly limit exceedance during the next reporting period and will continue to monitor Aluminum Precision's discharge and compliance status on a quarterly basis.

Anchen Pharmaceuticals, Inc. - Fairbanks (Permit No. 1-541180)

Anchen Pharmaceuticals, Inc. - Fairbanks (Anchen Fairbanks) manufactures pharmaceutical tablets and capsules. The manufacturing process includes weighing, mixing, granulation, drying, blending, compression, coating, and encapsulation (for capsules). Wastewater is generated by the cleaning of the equipment used in the production operations. Anchen Fairbanks does not have a pretreatment system and relies solely on best management practices in handling solvents used at the facility. Out of the five volatile organic compounds regulated under the Pharmaceutical Manufacturing federal category, acetone is the main constituent of concern at Anchen Fairbanks. When acetone is used in a formulation, it is also used to clean out residues in the mixing/blending equipment.

In November 2019, Anchen Fairbanks had a pH violation. In January 2020, OC San issued a Compliance Requirements Letter directing Anchen to attend a Compliance Meeting. OC San decided to discuss all violations at Anchen's facilities (Permit No. 1-541180, Permit No. 1-600359, and Permit No. 1-541179) in a combined manner in the Compliance Meeting, which was held in February 2020. During the meeting, Anchen indicated that they could not identify the exact source for the pH violation. OC San directed Anchen to submit a proposal for appropriate spill containment measures to prevent slug discharge from equipment failure during production. Additionally, OC San advised Anchen that the company may be required to install pretreatment equipment if the facility continues to be noncompliant. Anchen complied with all the requirements set forth in the Compliance Requirements Letter.

July 1 – December 31, 2020

Anchen Fairbanks had no further violations during this reporting period. OC San will continue to monitor Anchen Fairbanks' discharge and compliance status on a quarterly basis.

Anchen Pharmaceuticals, Inc. - Goodyear (Permit No. 1-600359)

Anchen Pharmaceuticals, Inc. - Goodyear (Anchen) manufactures pharmaceutical tablets and capsules. The manufacturing process includes weighing, mixing, granulation, drying, blending, compression, coating, and encapsulation (for capsules). Wastewater is generated by the cleaning of the equipment used in the production operations. Anchen does not have a pretreatment system and relies solely on best management practices in handling solvents used at the facility. Out of the five volatile organic compounds regulated under the Pharmaceutical Manufacturing federal category, acetone is the main constituent of concern at Anchen. When acetone is used in a formulation, it is also used to clean out residues in the mixing/blending equipment.

In January 2019, Anchen had acetone daily and monthly average discharge limit violations. In March 2019, OC San conducted a Compliance Inspection during which Anchen indicated that the company has not been able to determine the exact cause or source of the exceedance, although it can most likely be attributed to Anchen staff's failure to follow proper equipment cleaning procedures. In April 2019, OC San issued a Compliance Requirement Letter and held a Compliance Meeting with Anchen during which Anchen indicated that they have reminded their staff to follow proper waste handling procedures. Anchen also reminded their Technical Services and QC Laboratory group leaders that discharge of chemicals into any building's floor drains, sinks, and fume hood cup sinks is prohibited. OC San advised Anchen that the company may be required to install pretreatment equipment if the facility continues to be noncompliant. In May 2019, Anchen notified OC San via an email that the main product line at the Goodyear facility has been transferred to Anchen's Fairbanks facility. OC San issued another Compliance Requirements Letter directing Anchen to increase the frequency of acetone self-monitoring from semi-annual to quarterly, effective June 2019. OC San revised Anchen's permit to reflect this increased self-monitoring frequency for acetone. In December 2019, Anchen Goodyear had another acetone violation. This daily limit exceedance also resulted in a monthly limit violation.

In January 2020, OC San issued a Compliance Requirements Letter directing Anchen to attend a Compliance Meeting. Due to the chronic nature of the acetone violations at all Anchen facilities, OC San decided to discuss all violations at Anchen's facilities (Permit No. 1-541180, Permit No. 1-600359, and Permit No. 1-541179) in a combined manner in the Compliance Meeting, which was held in February 2020. During the meeting, Anchen attributed the most recent violation to a manufacturing equipment that was processing Fluvoxamine (FVM) during the sample event. Anchen conveyed that this specific equipment utilizes nozzles that spray Isopropyl Alcohol (IPA) for testing, which subsequently discharges to the sewer system via a floor drain in the processing area. IPA is known to metabolize into acetone. Anchen stated that the company has moved the FVM process from the Goodyear facility to Fairbanks facility, where the equipment is fitted with liners around the spray nozzles that prevent IPA waste discharge to the sewer system. Additionally, Anchen specified that the company

is transitioning from IPA bottles to wipes. OC San informed Anchen that these corrective measures were committed to by Anchen in 2019 but were not completed.

In March 2020, OC San issued a Compliance Requirements Letter directing Anchen to submit a proposal for appropriate spill containment measures to prevent any slug discharge due to an equipment failure during production operations, submit a proposal to collect more representative samples and mitigate any uncontrolled solvent discharge to the sewer. Additionally, OC San advised Anchen that the company may be required to install pretreatment equipment if the facility continues to be noncompliant. Anchen complied with all the requirements set forth in the Compliance Requirements Letter.

July 1 – December 31, 2020

On **August 19, 2020**, Anchen had a pH violation, for which a Notice of Violation was issued on **September 17, 2020**. On **September 30, 2020**, Anchen submitted a corrective action report attributing the violation to the accumulation of sediment buildup in the sampling point, in addition to high temperatures which caused deionized water to become more acidic. Anchen's corrective action to address the violation was to clean the sampling point, and schedule future periodic cleanings every six months. In addition, Anchen trained the employees on handling and disposal of hazardous waste.

OC San will continue to monitor Anchen Goodyear's discharge and compliance status on a quarterly basis.

Anchen Pharmaceuticals, Inc. - Jeronimo (Permit No. 1-541179)

Anchen Pharmaceuticals, Inc. - Jeronimo (Anchen Jeronimo) manufactures pharmaceutical tablets and capsules. The manufacturing process includes weighing, mixing, granulation, drying, blending, compression, coating, and encapsulation (for capsules). Wastewater is generated by the cleaning of the equipment used in the production operations. Anchen Jeronimo does not have a pretreatment system and relies solely on best management practices in handling solvents used at the facility. Out of the five volatile organic compounds regulated under the Pharmaceutical Manufacturing federal category, acetone is the main constituent of concern at Anchen Jeronimo. When acetone is used in a formulation, it is also used to clean out residues in the mixing/blending equipment.

In August 2019, Anchen Jeronimo had an acetone monthly average discharge limit violation. In December 2019, Anchen Jeronimo submitted a corrective action report indicating that the company has not been able to determine the exact cause or source of the exceedance. Anchen Jeronimo also stated that the company has reduced the amount of Isopropyl Alcohol (IPA – which can lead to acetone generation) used in production, removed the laboratory fume hood cup sinks, and will conduct quarterly audits to ensure that there is no future acetone violation.

In January 2020, OC San issued a Compliance Requirements Letter directing Anchen to attend a Compliance Meeting. Due to the chronic nature of the acetone violations at all Anchen's facilities, OC San decided to discuss all violations at Anchen's facilities (Permit No. 1-541180, Permit No. 1-600359, and Permit No. 1-541179) in a combined manner in the Compliance Meeting, which was held in February 2020. During the meeting, Anchen attributed the most recent violation at its Goodyear facility to a manufacturing equipment that was processing Fluvoxamine (FVM) during the sample event. Anchen conveyed that this specific equipment utilizes nozzles that spray Isopropyl Alcohol (IPA) for testing, which subsequently discharges to the sewer system via a floor drain in the processing area. IPA is known to metabolize into acetone. Anchen stated that the company has moved this process from the Goodyear facility to Fairbanks facility, where the equipment is fitted with liners around the spray nozzles that prevent IPA waste discharge to the sewer system. Additionally, Anchen specified that the company is transitioning from IPA bottles to wipes. OC San informed Anchen that these corrective measures were committed to by Anchen in 2019 but were not completed. OC San directed Anchen to submit a proposal for appropriate spill containment measures to prevent any slug discharge

due to an equipment failure during production operations, submit a proposal to collect more representative samples and mitigate any uncontrolled solvent discharge to the sewer. Additionally, OC San advised Anchen that the company may be required to install pretreatment equipment if the facility continues to be noncompliant. Anchen complied with all the requirements set forth in the Compliance Requirements Letter.

July 1 – December 31, 2020

Anchen Jeronimo had no further violations during this reporting period. OC San will continue to monitor Anchen Jeronimo's discharge and compliance status on a quarterly basis.

APCT Anaheim (Permit No. 1-600689)

APCT Anaheim (APCT Anaheim) is a manufacturer of electronic circuit boards for various industries. Wastewater is generated from the cleaning, circuit image developing, ammonia etching, resist stripping, oxide coating, copper plating, tin plating, copper etching, and soldermasking processes and associated rinses. APCT Anaheim's pretreatment system consists of three fixed treatment units (FTU #1, FTU #2, and FTU #3). FTU #1 is a batch treatment system used daily. FTU #2 is a continuous pretreatment system designed to supplement FTU #1 if flows generated from periods of high production exceed flows manageable to FTU #1. FTU #3 is a batch pretreatment for resist stripper waste. FTU #2 and FTU #3 are currently not in use. FTU #1 discharges to Discharge Tank 6A, which also receives from flows characterized as not needing pretreatment. Discharge Tank 6A is equipped with automatic pH control and discharges to a final, below-ground, three-stage clarifier.

In June 2020, APCT Anaheim had copper daily and monthly average discharge limit violations.

July 1 – December 31, 2020

On **July 2, 2020**, OC San issued a Notice of Violation for the June 2020 copper daily limit exceedance. APCT Anaheim responded with corrective actions, which included clarifier clean-out and the implementation of batch treatment logs that included copper sampling results. On **July 15, 2020**, OC San conducted a Compliance Inspection which revealed that existing flow rates were overloading the hydraulic capacity of the batch treatment system and impacting APCT Anaheim's ability to maintain compliance. On **August 10, 2020**, OC San issued a Probation Order to address APCT Anaheim's pretreatment deficiencies. On **September 3, 2020**, OC San issued a Notice of Violation for the June 2020 copper monthly limit exceedance. On **October 6, 2020**, OC San issued a Compliance Requirement Letter requiring APCT Anaheim to attend a Compliance Meeting, which was held on **October 13, 2020**. On **October 19, 2020**, OC San issued a Compliance Requirements Letter with new completion dates for the Probation Order. APCT Anaheim submitted a waste management proposal, which included the start-up of an out-of-service continuous treatment system (CTS) to remove some of the wastewater load from the batch treatment system. On **November 17, 2020**, OC San accepted the proposal, after which APCT Anaheim proceeded with the CTS start-up and completion of outstanding the Probation Order requirements.

OC San will continue to monitor APCT Anaheim's discharge and compliance status and the completion of the Probation Order requirements in the next reporting period.

APCT Orange County (Permit No. 1-600503)

APCT Orange County (APCT OC) specializes in prototype, quick turn, and semi-production orders. The manufacturing operations begin by generating the film photo-tools. Production of the typical multilayer board begins by cutting the copper clad and pre-preg materials, photoresist application, inner-layer circuit imaging, phototresist developing, ammonium etching, alkaline resist stripping, and automatic optical inspection (AOI). This is followed by surface preparation, lamination, and drilling.

Outer-layer circuit development proceeds by either panel-plate or pattern-plate process steps. Panel-plate boards undergo copper plating followed by photoresist application, circuit imaging, photoresist developing, and ammonium etching. Pattern-plate boards undergo photoresist application, circuit imaging, resist developing, and copper plating. The pattern-plate boards are then sent offsite for tin/lead plating and brought back onsite for ammonium etching and tin resist stripping. After resist stripping, the boards undergo a second AOI inspection, followed by LPI solder mask application. The boards are again sent offsite for final surface finishing such as hot air solder leveling and/or nickel/gold plating. Upon return, the boards receive legend screening, a final visual inspection, routing, and electrical testing. APCT OC employs ion exchange, batch treatment and pH adjustment to treat all wastewater generated prior to discharge to the sewer.

July 1 – December 31, 2020

On **November 6, 2020**, APCT OC had a copper violation, for which a Notice of Violation was issued on **November 24, 2020**. On **December 15, 2020**, APCT OC submitted a Corrective Action Report attributing the cause of the copper violation to a mechanical mixer failure. APCT OC noted that the pH value in the scavenger holding/pH adjustment tank was out of range for optimal copper removal due to lack of mixing within the tank. APCT OC's investigation revealed that the mixer shaft impeller had fallen off into the bottom of the tank. APCT OC replaced the mixer.

On **December 17, 2020**, OC San commented on the Corrective Action Report and requested further clarification. On **December 18, 2020**, APCT OC responded with a report stating that a faulty pH meter in the automatic pH adjustment system within the Final Effluent Tank had also contributed to the copper violation.

OC San will continue to monitor APCT's discharge and compliance status on a quarterly basis.

ARO Service (Permit No. 1-021192)

ARO Service (ARO) performs repair and refurbishment of aluminum aircraft skins and wing components for the aviation industry. Operation at ARO includes chemical surface treatment. The conversion coating line at ARO consists of alkaline cleaning followed by a series of phosphoric acid/deoxidizer treatment and conversion coating and associated deionized water spray rinses. Wastewater from the rinse tanks is collected in a batch tank where soda ash is added and mixed with an air sparger to obtain a pH of 7.0 or higher before discharge to the sewer.

In April 2020, ARO had copper and zinc monthly average discharge limit violations.

July 1 – December 31, 2020

On **July 13, 2020**, OC San issued a Notice of Violation for ARO's April 2020 copper and zinc monthly limit exceedances. ARO was informed of the need to target monthly average limits versus daily discharge limits to ensure long-term compliance.

ARO had no further violations during this reporting period. OC San will continue to monitor ARO's discharge and compliance status on a quarterly basis.

Arrowhead Products Corporation (Permit No. 1-031137)

Arrowhead Products Corporation (Arrowhead) manufactures air ducting systems, fuel manifolds, flexible metallic joints connectors, and complex fabricated components for aerospace applications. Wastewater generating operation(s) include abrasive jet machining, caustic dip, dye penetrant testing, general pickling, titanium pickling, alkaline cleaning, permanganate cleaning, pressure testing, Turco

cleaning, and ultrasonic cleaning. Arrowhead operates a continuous pretreatment system, which consists of pH adjustment, chrome reduction, filtration, media adsorption, and clarification.

In February 2020, Arrowhead had a nickel monthly average discharge limit violation. In April 2020, Arrowhead had a pH violation. Due to recurring valve failures during the regeneration of their ion exchange system, Arrowhead submitted a proposal to reconfigure their pretreatment system and replace their ion exchange units with new Evoqua vessels with media adsorption units that will be regenerated offsite once spent. In May 2020, OC San conducted a Compliance Inspection and resampling during which Arrowhead attributed the pH violation to a failure in their pH adjustment system due to a faulty electrical component in their pH controller, which Arrowhead fixed immediately upon discovery. Resampling results showed compliant pH. In June 2020, Arrowhead submitted a corrective action report stating that the pretreatment system reconfiguration and upgrade had been completed and included a pH alarm and an automatic fail-safe, shut-off controls. OC San issued a Compliance Inspection Findings and Requirements Letter requiring Arrowhead to demonstrate that the newly installed Evoqua vessels can reliably meet compliance for heavy metals. At OC San's direction, Arrowhead conducted wastewater characterization to assess/demonstrate the effectiveness of the Evoqua vessels.

July 1 – December 31, 2020

From **July 31, 2020** through **November 10, 2020**, OC San conducted multiple inspections at Arrowhead to address the facility issues, including: the wastestreams at Arrowhead's Plant 2 that bypass treatment and/or the compliance sample point, the lack of adequate treatment or flow measurement for several wastestreams, and the newly established effluent discharge limits issued in the recent permit renewal based on information collected during the inspections.

On **December 9, 2020**, OC San issued a Compliance Requirements Letter requiring Arrowhead to attend a Compliance Meeting to discuss a schedule to make the necessary modifications at the facility to correct the noted deficiencies, and the conversion of Arrowhead from a permittee regulated as a Metal Finisher (40 CFR 433) to a permittee regulated under the Iron and Steel Manufacturing category (40 CFR Section 420) and the Nonferrous Metals Forming and Metal Powders category (40 CFR Section 471). On **December 29, 2020**, OC San held the Compliance Meeting with Arrowhead.

OC San will issue a Regulatory Compliance Schedule Agreement (RCSA) between OC San and Arrowhead during the next reporting period and will continue to monitor Arrowhead's discharge and compliance status through the compliance schedule.

Aseptic Technology LLC (Permit No. 1-600716)

Aseptic Technology LLC (Aseptic) manufactures products such as fruit juice, fruit smoothies, nut milk and plant-based proteins. Batch process at Aseptic includes blending of wet/dry ingredients, pasteurization, and filling of beverages into bottles. Wastewater is generated from equipment clean in place (CIP) process, as well as from facility sanitation. Wastewater is routed to a three-stage underground clarifier for pH adjustment and solids settling prior to discharge to the sewer.

During routine inspections in March and April 2020, OC San observed that Aseptic's pH adjustment system was removed without prior notification to OC San. The effluent meters were inaccessible due to excessive flooding in the effluent meter boxes, and OC San discovered a bypass piping around the effluent meters. In April 2020, Aseptic reinstalled the pH adjustment system at OC San's direction. However, the system's low setpoint was at 6.0, which did not allow any safety factor above the 6.0 lower pH limit. Furthermore, Aseptic's effluent meters failed the calibration test performed on the same day. The calibration report, which was submitted to OC San later that month, indicated that the meters utilized at Aseptic are not recommended for wastewater applications.

In May 2020, OC San issued a Compliance Requirements Letter directing Aseptic to immediately raise the setpoint of the pH adjustment system to achieve effective neutralization, disconnect the bypass piping around the effluent meters, remove excess water in the effluent meter boxes, and submit a proposal to address inaccurate meter readings and to implement the approved proposal. In May 2020, Aseptic submitted a response letter listing the corrective measures implemented onsite, which included raising the low pH setpoint system to 7.0 S.U. and reconfiguring the effluent meters to be aboveground. Additionally, Aseptic proposed replacing the existing effluent meters with magnetic meters. These new meters were installed in June 2020.

July 1 – December 31, 2020

Aseptic had no further violations during this reporting period. OC San will continue to monitor Aseptic's discharge and compliance status on a quarterly basis.

Aseptic Technology, LLC (Permit No. 1-501002)

Aseptic Technology, LLC (Aseptic) is a beverage and dietary supplements manufacturer. Due to a delinquency in making timely payments for user charges, in January 2016, the OC San Board of Directors approved a 12-month payment agreement with Aseptic in the amount of \$199,228.03. Aseptic made timely payments in accordance with the agreement and completed the 12-month schedule as of January 2017. However, Aseptic Technology failed to make payments against quarterly invoices after January 2017; thereby necessitating a second payment agreement request in July 2017 for delinquent amounts totaling \$451,161.54. The second payment agreement also required Aseptic to remit timely payments against new obligations occurring during the term of the agreement.

In January 2018, Aseptic requested a third payment agreement for delinquencies owed in the amount of \$252,315.72. This payment agreement request was authorized, and it required a letter of credit and a stipulation that current invoices were to be paid in a timely manner. As a result of the payment agreement, a typical two-year Class 1 permit was not issued to Aseptic, and the permit was renewed for only three months-at-a-time.

Due to Aseptic's repeated failure to make timely payments pursuant to the third payment agreement, OC San did not renew the permit which was expiring end of March 2019. In April and May 2019, OC San conducted Compliance Inspections during which OC San noted that Aseptic continued to discharge industrial wastewater to the sewer. In April 2019, OC San issued Aseptic an Order to Cease Discharge Without a Valid Permit. When a payment was finally received in May 2019, the then expired permit was renewed with a new expiration date set for the end of that month. This permit was not renewed again due to the facility's non-payment of user charges. In June 2019, OC San issued another Order to Cease Discharge Without a Valid Permit and held a Compliance Meeting during which Aseptic agreed to settle the violations associated with discharging without a valid permit.

In July 2019, OC San issued another Order to Cease Discharge Without a Valid Permit due to Aseptic's failure to make full payment of past due amounts. In August 2019, OC San issued a Settlement Agreement to Aseptic for a settlement of \$185,000.00 for discharging without a valid permit between April 1 and June 17, 2019. Aseptic has been making monthly payment towards these negotiated penalties, however, Aseptic has not paid the overdue user charges; hence, in September 2019, OC San issued another Order to Cease/Terminate Discharge Without a Valid Permit.

Aseptic continued to discharge without a valid permit through the end of June 2020. As a result, OC San escalated enforcement to a civil judicial remedy.

July 1 – December 31, 2020

In **December 2020**, OC San drafted a Stipulation for Judgment and Injunction through a California State Superior Court and planned to enter into an agreement with Aseptic for the payment of past due

amounts and issuance of a permit. OC San will continue this enforcement action in the next reporting period.

Astech Engineered Products (Permit No. 1-571295)

Astech manufactures jet engine housings and exhaust nozzles, thrust reverser components, navy ship doors, light weight high-strength, and heat resistant and noise suppression structures. Wastewater generating operations include acid etching, alkaline cleaning, acid pickling, wet scrubbing, cleaning, waterjet saw cutting, seam welding, panel welding, penetrant dye testing, and associated rinses. Astech utilizes a pH neutralization and three-stage clarification system for the rinses and scrubber overflow. The waterjet cutting wastestream undergoes aboveground solids settling followed by underground three-stage clarification prior to discharge to the sample point.

In February 2020, Astech had a pH violation. In April 2020, OC San conducted a Compliance Inspection during which Astech attributed the violation to failure of the pH probe in their automated pH neutralization system. At the time of the inspection, the pH probe had already been replaced and the pH meter calibrated.

July 1 – December 31, 2020

Astech had no further violations during this reporting period. OC San will continue to monitor Astech's discharge and compliance status on a quarterly basis.

Avid Bioservices, Inc. (Permit No. 1-571332)

Avid Bioservices, Inc. (Avid) is a Contract Development Manufacturing Organization (CDMO) specializing in mammalian cell culture development and production of clinical and commercial monoclonal antibodies, recombinant proteins, and enzymes. Liquid salt solutions and spent media are used throughout the process and are collected from the downstream purification area to be neutralized. Most solutions are 0.2µm filtered during processing. Medium containing culture is disinfected prior to discharge to the sewer. Wastewater is also generated from the cleaning of the equipment used in the production operations and disinfected media culture. Avid has a pH adjustment system to treat the wastewater to compliant pH range.

July 1 – December 31, 2020

On **December 2, 2020**, Avid had an acetone violation, for which a Notice of Violation will be issued in the next quarter. OC San will conduct enforcement during the next reporting period and continue to monitor Avid's discharge and compliance status.

Bimbo Bakeries USA, Inc. (Permit No. 1-521838)

Bimbo Bakeries, USA, Inc. (Bimbo) manufacturers baked products. The general operations include mixing, proofing, baking, cooling, and packaging. All wastewater gravity flows through floor drains into a three-stage underground clarifier. The clarifier is equipped with an automated pH adjustment system.

In April 2020, Bimbo had a pH violation. In May 2020, OC San conducted resampling and the results showed compliant pH. In June 2020, OC San conducted a Compliance Inspection during which Bimbo attributed the pH violation to a pH probe failure in the pH adjustment system. The pH probe failed due to excessive solids accumulation in the three-stage underground clarifier.

July 1 – December 31, 2020

On **July 14, 2020**, OC San issued a Compliance Requirements Letter requiring Bimbo to submit a corrective action report documenting actions taken to avoid further pH violations. On **July 31, 2020**, Bimbo submitted a Corrective Action Report along with the pH meter calibration report and the clarifier's solids pump out records. Bimbo instituted corrective actions including daily pH probe checks, weekly pH meter calibration check, and increased frequency of solids removal from the clarifier.

OC San will continue to monitor Bimbo's discharge and compliance status on a quarterly basis.

Brindle Thomas - Catalina & Copeland (Permit No. 1-541430)

Brindle Thomas - Catalina & Copeland (Brindle) operates an oil well that produces crude oil and brine. Brindle separates the crude oil and water in a wash tank and then further treats the wastewater in a multi-stage clarifier to remove any remaining oil.

July 1, 2020 – December 31, 2020

On **December 8, 2020**, Brindle had an oil & grease violation, for which a Notice of Violation will be issued in the next reporting period.

OC San will evaluate Active Plating's compliance with this requirement during the next reporting period.

Bristol Industries (Permit No. 1-021226)

Bristol Industries (Bristol) manufactures military specification fasteners, including nuts, bolts, washers, and rivets, as well as airplane window channels. Wastewater is generated from the metal finishing and aluminum forming operations, which include acid/alkaline cleaning, plating (silver, copper, nickel, chromium, and cadmium), anodizing, deburring, and associated rinses. Bristol operates a batch and a continuous pretreatment system. The continuous pretreatment system consists of an equalization tank, chrome reduction, cyanide destruction, hydroxide precipitation, pH adjustment, an effluent pH controller and recorder, final polishing filter, filter press, Lamella clarifier, and an electrowinning system. The batch treatment system is used to treat spent process solutions.

Throughout 2017, 2018, 2019 and first half of 2020, Bristol discharged industrial wastewaters which were chronically non-compliant with the cyanide (amenable and total), cadmium, nickel, silver, and pH effluent discharge limits. OC San had issued numerous Notices of Violations, Compliance Requirement Letters and Orders, conducted multiple Compliance Inspections, and held multiple Compliance Meetings with Bristol. Bristol completed several corrective actions to resolve the root cause behind the violations; however, systemic operational issues and inadequate pretreatment equipment prevented Bristol from achieving consistent compliance. In 2019, Bristol was issued a Settlement Agreement, followed by an Enforcement and Compliance Schedule Agreement which directed the facility to implement significant modifications to the facility and its operations through 2019 and 2020, including a revised pretreatment system, in order to achieve long-term compliance with permit and Ordinance terms and conditions.

July 1 – December 31, 2020

On **July 14, 2020**, OC San conducted a Compliance Inspection to verify the installation of the new pretreatment system at Bristol. The pretreatment system, with the exception of the Silver Ion-net system proposed by Bristol, was completed and appeared to be maintained properly. The Silver Ion-net system was confirmed to be installed on **July 31, 2020**. At OC San's direction, Bristol conducted multi-day self-checks for the pretreatment system to ensure the system was working within the

operating parameters. Bristol's permit was also revised to account for the recent changes in equipment and effluent flow at the facility.

Bristol had no further violations during this reporting period. OC San will continue to monitor Bristol's discharge and compliance status on a quarterly basis.

Catalina Cylinders (Permit No. 1-031021)

Catalina Cylinders, a Div. of APP (Catalina Cylinders) manufactures high pressure gas cylinders from 6061 aluminum alloy material. The cylinders are produced in various sizes for the beverage, medical, and SCUBA diving industries. Wastewater is generated from the alkaline cleaning, hydrostatic pressure testing, and the iron phosphate conversion coating operations. Pretreatment at Catalina Cylinders is limited to a three-stage underground clarifier.

In January 2019 Catalina Cylinders had an oil & grease of mineral or petroleum origin mass violation, for which a Notice of Violation was issued in March 2019. In March 2019, OC San conducted a Compliance Inspection during which OC San explained to Catalina Cylinders that based on the manufacturing operations conducted onsite, the company's wastewater discharge is subject to the Aluminum Forming federal categorical pretreatment standards and, as a result, the oil & grease mass limits are production-based. OC San explained further that to comply with the stringent production-based mass limits, the oil & grease concentration must be kept below approximately 15 mg/L during an average day's flow, which would likely require pretreatment beyond the clarifier they presently operate.

In April 2019, Catalina Cylinders had another oil & grease mass violation. In May 2019, OC San issued a Notice of Violation and conducted another Compliance Inspection to reiterate concerns about Catalina Cylinders' noncompliance with the oil & grease mass emission limits. In October 2019, OC San issued a Compliance Summary Letter requiring Catalina Cylinders to conduct multi-day self-monitoring that month. The multi-day self-monitoring results showed compliance with their oil & grease mass emission limits. Also, in October 2019, Catalina Cylinders was published in the newspaper as Significantly Non-Compliant for the FY 2018-2019 reporting period due to its January and April 2019 acute oil & grease discharge violations.

July 1 – December 31, 2020

On **July 9, 2020**, Catalina Cylinders had another oil & grease mass violation, for which a Notice of Violation was issued on **August 27, 2020**. On **October 14, 2020**, OC San issued a Compliance Requirement Letter requiring Catalina Cylinders to attend a Compliance Meeting. On **November 4, 2020**, OC San held the Compliance Meeting with Catalina Cylinders, during which Catalina Cylinders proposed reviewing the procedures used for collecting the self-monitoring samples, increasing the maintenance of the facility clarifier, and evaluating options to install an oil & grease pretreatment system.

OC San will follow up with Catalina Cylinders corrective actions in the next reporting period.

City of Newport Beach (West Coast Hwy - Oil Extraction) (Permit No. 1-600584)

The City of Newport Beach operates a crude oil extraction facility near West Coast Highway in Newport Beach. Crude oil and produced water are pumped directly from 16 oil wells to a separation tank. From the separation tank, the produced water is pumped to a machine where additional oil, grease, and solids are removed. The produced water is pumped through a filter system where it is further polished before reinjection back into the aquifer. In the case of a scheduled or unscheduled shutdown (power outage or injection pump maintenance), where the produced water could not be reinjected, the produced water would be diverted from the injection system to the sewer system.

In June 2020, the City of Newport Beach had an oil & grease violation.

July 1 – December 31, 2020

On **August 17, 2020**, OC San issued a Notice of Violation for the June 2020 oil & grease noncompliance. The City of Newport Beach reported that they had not discharged any wastewater to the sewer for approximately one year as the wastewater was being re-injected back into the aquifer. However, discharge to the sewer was resumed in June 2020 as the re-injection pump needed repairs. The City of Newport Beach noted that since that was the first discharge to the sewer after a year, the tanks and piping used to transport wastewater may have contained excess oil & grease buildup. As a corrective action, the City of Newport Beach performed routine maintenance on the pretreatment system and associated equipment as the re-injection pump is to be offline for the foreseeable future. Resampling on **July 2, 2020** demonstrated compliance.

The City of Newport Beach had no further violations during this reporting period. OC San will continue to monitor the City of Newport Beach's discharge and compliance status on a quarterly basis.

City of Tustin – Maintenance Yard (Permit No. 1-071058)

The City of Tustin – Maintenance Yard (Tustin Maintenance Yard) conducts fleet maintenance for city automobiles, trucks, and street sweepers, including steam cleaning and pressure washing. The wastewater is routed through a two-stage clarifier through a vault to the sewer system. Clarifier and vault maintenance include regular skimming and a set frequency of sludge buildup pump-out.

In June 2020, Tustin Maintenance Yard had a zinc violation. OC San conducted a Compliance Inspection during which City of Tustin indicated that the most likely cause of the exceedance was the altered truck routes that may have higher contents of heavy metals. During the inspection, OC San informed Tustin Maintenance Yard of the access issues with the currently configured sampling point.

July 1 – December 31, 2020

On **July 7, 2020**, Tustin Maintenance Yard submitted a written description of the cause of the June 2020 zinc violation and the corrective actions taken by the company. Tustin Maintenance Yard attributed the violation to the altered truck routes that may have higher contents of heavy metals. Corrective actions included increasing the cleaning frequency of the truck wash area from three months to two months and increasing the cleaning frequency of the sample vault from annually to semi-annually. Tustin Maintenance Yard corrected the access issues with the sampling point by building a new sampling structure for OC San's access. OC San revised Tustin Maintenance Yard's permit to increase self-monitoring frequency for zinc.

Tustin Maintenance Yard had no further violations during this reporting period. OC San will continue to monitor Tustin Maintenance Yard's discharge and compliance status on a quarterly basis.

Coast to Coast Circuits, Inc. (Permit No. 1-111129)

Coast to Coast Circuits, Inc. (Coast) is a medium size facility that specializes in quick-turn and semi-production orders for aerospace, commercial, medical, military/defense, and telecommunication applications. The circuit manufacturing processes include cutting the copper clad or unclad materials, photoresist application, inner-layer circuit imaging, resist developing, ammonium etching, and alkaline resist stripping. For multilayer boards, this is followed by brown oxide or plasma surface preparation, lamination, drilling, and plasma or high-pressure de-smear.

The pretreatment system consists of a general heavy metals ion exchange system, a tin lead ion exchange system, an evaporator with pH adjustment, and a clarifier with pH adjustment. Dilute tin lead

rinse waters are treated and recycled in the tin lead ion exchange system. All other dilute metal bearing rinse waters are treated and recycled in the general heavy metals ion exchange system. Concentrated acidic and alkaline waste waters are pH adjusted and sent to the evaporator. Condensate from the evaporator is recycled back to the general heavy metals ion exchange system and concentrated liquid from the evaporator is waste hauled. Nonmetal-bearing wastewaters are routed to the three stage above ground clarifier for pH adjustment and discharge to the sewer.

In October 2019, Coast had a pH violation. In a previous inspection, OC San noted additional compliance issues including incomplete facility drawings, missing or illegible labels, failure to separate cyanide bearing waste streams from non-cyanide bearing waste streams, ineffective pH adjustment system, and the use of non-regulated waste streams as dilution flows. In October 2019, OC San issued a Compliance Requirements Letter requiring Coast to address the compliance deficiencies by November 2019, which Coast failed to meet. Coast requested and was granted an extension to complete the compliance requirements during the next quarter.

In January 2020, Coast submitted a compliance schedule in response to the Compliance Requirements Letter. In February 2020, OC San conducted a Compliance Inspection and resampling during which OC San noted that while Coast had increased the caustic pump size in an attempt to enhance the pH adjustment system in the neutralization tank, the pH in some of the aliquots of the 24-hour composite resample were noncompliant. Coast stated that they were unaware of the source of the low pH and were working with their consultant to put corrective actions in place. In February and May 2020, OC San issued Compliance Requirements Letters directing Coast to attend a Compliance Meeting. In June 2020, OC San issued a Probation Order to address untreated ion exchange regenerant being discharged to the sewer, sample point dilution with non-regulated wastewater, inadequate pH control, lack of cyanide segregation, and inadequate tank and piping labeling.

July 1 – December 31, 2020

On **August 13, 2020**, Coast had copper daily limit and mass violations, for which a Notice of Violation was issued on **September 10, 2020**. The daily limit exceedance also resulted in a copper monthly average discharge limit violation. On **October 14, 2020**, OC San issued a Compliance Requirements Letter requiring Coast to attend a Compliance Meeting to discuss the violations and Coast's Probation Order compliance status. On **October 29, 2020**, OC San held a Compliance Meeting with Coast after Coast submitted a proposal that failed to meet the Probation Order requirements. On **November 4, 2020**, OC San issued a Compliance Requirements Letter with new compliance schedule dates for the Probation Order requirements. On **November 5, 2020**, OC San issued a Notice of Violation for the August 2020 monthly limit exceedance. On **December 18, 2020**, after further discussion with Coast, OC San accepted Coast's proposal to install a new automatic batch treatment system, a new pH adjustment tank and clarifier, and a pH chart recorder with automatic pH non-compliance diversion valve.

OC San staff will continue to monitor Coast's discharge and compliance status, as well as confirm Probation Order requirements, during the next reporting period.

Columbine Associates (Permit No. 1-521784)

Columbine Associates (Columbine) produces crude oil from five oil extraction wells. The extracted crude oil and groundwater mixture is separated in a wash tank. The resulting wastewater passes through granular activated carbon vessels and to a two-stage clarifier prior to discharge to the sewer.

July 1 – December 31, 2020

During routine inspection and sampling events on **July 17** and **July 28, 2020**, OC San observed a thick layer of crude oil that has accumulated in Columbine's two-stage clarifier. On **August 6, 2020**, Columbine had an oil & grease violation, for which a Notice of Violation was issued on **August 27,**

2020. On **October 15, 2020**, OC San issued a Compliance Inspection Summary and Requirements Letter. On **October 28, 2020**, Columbine submitted a root cause analysis and a Corrective Action Report, in which Columbine attributed the oil & grease violations to clarifier air compressor failure, which led to excessive crude oil accumulation in the clarifier. The air compressor was fixed, and the accumulated crude oil was pumped out of the clarifier, on **November 15, 2020**. On **November 27, 2020**, Columbine submitted Standard Operating Procedures for each pretreatment equipment onsite and installed a new cover on the two-stage clarifier.

OC San will continue to monitor Columbine's discharge and compliance status on a quarterly basis.

Continuous Coating Corporation (Permit No. 1-021290)

Continuous Coating Corporation (Continuous Coating) manufactures coated steel coils and drywall cornerbead. Steel coils are uncoiled and joined on the coil coating line where they are electro-cleaned with multiple rinses including sulfuric acid. The sulfuric spray, when used, is heated and closed-looped. From this point, coils proceed through one of three options: zinc electroplating, zinc electroplating followed by chromate conversion coating, or zinc phosphating. Coating is followed by rinsing and an air knife. This is followed by another spray rinse. Water is then removed by use of an air knife. All rinses are counterflow and have multiple uses. The steel is recoiled, slit, roll-formed, punched, cut, packaged, palletized, and then delivered to the customer. Wastewater is generated from the various rinses used throughout the process and is treated in a continuous treatment system prior to discharge to the sewer. No wastewater is generated from the manufacture of the drywall corner products.

In November 2019, Continuous Coating had a cadmium monthly average discharge limit violation, the source/cause of which Continuous Coating was unable to identify.

July 1 – December 31, 2020

In the month of **September 2020**, Continuous Coating had a zinc monthly average discharge limit violation, for which a Notice of Violation was issued on **December 3, 2020**. Continuous Coating's investigation revealed that the violation may have been caused by abnormal manufacturing operations and pretreatment system equipment malfunction. As a result, Continuous Coating retrained operators to identify and correct manufacturing line issues that may contribute to spikes in pollutant concentrations, replaced treatment system equipment that may have exceeded its expected life or was malfunctioning, and increased monitoring using in-house testing for pollutants.

OC San will continue to monitor Continuous Coating's discharge and compliance status during next reporting period.

Cooper and Brain, Inc. (Permit No. 1-031070)

Cooper and Brain, Inc. (Cooper & Brain) produces crude oil from multiple oil extraction wells. The extracted crude oil and groundwater mixture is separated in a wash tank. The resulting wastewater is routed to an aboveground clarifier to remove residual oil & grease prior to discharge to the sewer system.

July 1 – December 31, 2020

On **November 10, 2020**, Cooper & Brain had an oil & grease violation, for which a Notice of Violation was issued on **December 10, 2020**.

OC San will conduct enforcement during the reporting period and will continue to monitor Cooper & Brain's discharge and compliance status.

Corru-Kraft Buena Park (Permit No. 1-600806)

Corru-Kraft Buena Park (Corru-Kraft) manufactures corrugated sheets by combining paper using starch-based adhesive, steam, and hydraulic pressure. The starch adhesive is prepared onsite and pumped to the processing equipment. Wastewater is generated from the washing of the starch mixing tank and several corrugating equipment lines following production. Wastewater passes through a four-stage underground clarifier prior to discharge to the sewer.

In September 2019, Corru-Kraft had a pH violation. In November 2019, OC San conducted a Compliance Inspection and resampling, during which OC San identified that pH treatment may be required to ensure consistent compliance. OC San noted that the wastewater enters the clarifier with a pH of approximately 11.5 S.U. at a high temperature, which creates a reaction resulting in solids formation in the first two stages of the clarifier, and a significant drop in pH in the final stage of the clarifier. Corru-Kraft conducted an evaluation to determine if more frequent clarifier cleaning will maintain pH compliance or if a pretreatment system will be required.

In January 2020, Corru-Kraft had another pH violation. Corru-Kraft began utilizing chlorine tablets in various stages of the clarifier to lower the pH. However, this modification was implemented without prior notification to and acceptance by OC San. In April 2020, Corru-Kraft had further pH violations. As a result, OC San issued Corru-Kraft a Compliance Requirements Letter directing the company to submit a pretreatment proposal following several pH violations where Corru-Kraft took no significant corrective action. In May 2020, OC San received an initial proposal for a pH adjustment system; however, the proposal listed two different options. Corru-Kraft requested a one-month extension, needing to provide specific information on which system would be proposed and implemented. OC San received the final proposal from Corru-Kraft in June 2020.

July 1 – December 31, 2020

On **July 14, 2020**, Corru-Kraft had another pH violation, for which a Notice of Violation was issued on **July 30, 2020**. OC San accepted Corru-Kraft's submitted pretreatment proposal on **July 14, 2020**, after receiving requested additional supporting information. OC San required installation by **September 15, 2020**. On **July 31, 2020**, OC San received an alternative pH adjustment system proposal from Corru-Kraft. This alternative proposal presented several design issues and discrepancies. Following discussions regarding the request for the alternative proposal and design issues, OC San rejected the alternative proposal via an email dated **September 15, 2020**. On **September 28, 2020**, OC San received a third and final proposal from Corru-Kraft, which reflected the initial pH adjustment system proposal from May 2020. On **October 1, 2020**, OC San accepted the proposal and provided an installation due date of **November 15, 2020**.

OC San will continue enforcement during the next reporting period and continue monitoring Corru-Kraft's discharge and compliance status.

CP-Carrillo, Inc. (Armstrong) (Permit No. 1-600920)

CP-Carrillo, Inc. (Armstrong) (CP Armstrong) manufactures aluminum pistons for the automotive industry, mainly conducting aluminum anodizing and graphite skirt coating. CP Armstrong anodizes the ring groove on aluminum pistons using an electrolysis process with sulfuric acid. Additionally, there is a post anodizing washing machine which washes out the residual acid left in the ring groove of the piston. There are two additional washing machines that activate the aluminum material through mechanical impingement and heat into a porous finish with an alkaline wash and soap. Currently, the wastewater generated on site is collected in a 500-gallon batch tank and the company mostly relies on wastewater equalization to achieve a neutral pH.

In October 2019, CP Armstrong had a pH violation. In January 2020, OC San conducted a Compliance Inspection during which CP Armstrong submitted their corrective action letter. CP Armstrong indicated that at the time of the violation, the facility was only running post-anodize wash solution, which is a low pH solution, and the batch was not pre-tested for pH before discharge to the sewer system. Corrective actions included: (1) simultaneously running all operations such that the combined wastestream would self-neutralize itself within the compliant range, (2) pre-testing the batch before discharge to the sewer system, and (3) neutralizing the batch if pre-test shows noncompliance with the pH limits. CP Armstrong had no further violations during this reporting period.

July 1 – December 31, 2020

CP Armstrong had no further violations during this reporting period. OC San will continue to monitor CP Armstrong's discharge and compliance status on a quarterly basis.

Data Electronic Services, Inc (Permit No. 1-011142)

Data Electronic Services (DES) conducts work on customer supplied boards. The circuit board manufacturing process is typically proceeded by copper panel plating; however, a very small percentage of the boards are processed by copper pattern plating techniques. Tin plating etch resist in the pattern plate procedure is also conducted. Multilayer hole conductivity is completed via potassium permanganate, hole conditioning, micro-etch, palladium catalyst, and electroless copper plating. Other operations conducted on site include automatic and high pressure Hyoki scrubbing, resist stripping and rack stripping. Final surface finishing includes bright nickel plating, silver plating, tin plating and electroless nickel immersion gold plating. The effluent discharge at DES is generated by the aqueous fume scrubbing, the various spent process solutions, and the associated rinse wastestreams. DES employs continuous hydroxide precipitation, batch treatment, clarification and solids processing by filter press prior to discharge to OC San sewer.

July 1 – December 31, 2020

On **October 21, 2020** and **December 3, 2020**, DES had copper violations, for which Notices of Violation were issued on **November 5, 2020** and **December 17, 2020**, respectively.

OC San will conduct a Compliance Inspection during the next reporting period and continue to monitor DES's discharge and compliance status.

DCOR, LLC (Permit No. 1-111013)

DCOR, LLC (DCOR) is a facility that receives and separates crude oil and water from offshore drilling platforms. Crude oil is stored and shipped to other facilities while the separated water is discharged to the sewer.

In November 2019, OC San conducted a Compliance Inspection to determine if stormwater was being discharged to the sewer from the DCOR facility. During the inspection, the site contact stated that stormwater is collected, treated, and discharged to the sewer. OC San informed DCOR that stormwater discharge to the sewer is prohibited in accordance with OC San's Wastewater Discharge Regulations. In December 2019, OC San issued a Compliance Requirements Letter requiring DCOR to develop a proposal to cease the discharge of any stormwater, surface runoff, or subsurface drainage to the sewer, and submit the proposal to OC San and after acceptance, complete implementation of the accepted proposal by the next quarter.

In February 2020, DCOR submitted a proposal to cease discharge of stormwater to the sewer and re-route the collected stormwater to a storm drain after testing confirms compliance with applicable

regulations. Due to the COVID-19 pandemic and work slowdown, DCOR requested and was granted an extension to complete the project by end of September 2020.

July 1 – December 31, 2020

On **September 29, 2020**, DCOR notified OC San that the work to cease discharge of stormwater to the sewer had been completed.

OC San will continue to monitor DCOR's discharge and compliance status on a quarterly basis.

Derm Cosmetic Labs, Inc. (Permit No. Z-600455)

Derm Cosmetic Labs, Inc. (Derm), also known as LA's Totally Awesome Products, manufactures various cleaning and disinfectant products. Products manufactured include laundry detergent, bleach, chlorine, fabric softener, liquid dish detergent, all-purpose cleaner, degreaser, liquid hand soap, drain cleaner, fabric refresher, floor cleaner, odor eliminator, pet shampoo/stain remover/odor eliminator, and various automotive wash and cleaners. Derm's process involves receiving bulk or raw product that has either not passed name-brand manufacturer inspection or has been damaged during shipment, and re-bottling, remixing, or blending/diluting prior to shipping and receiving to various discount supply stores. All tanks are dedicated to a specific product. If a tank is required to be cleaned, the wastewater generated is run through an above-ground clarifier and reused to produce liquid and gel drain opener.

In February 2020, OC San conducted a Compliance Inspection to verify Derm's compliance with its Zero Discharge Certification. During the inspection, OC San observed wastewater from the chlorine manufacturing and washing operations flowing into the floor drains which lead to an underground sump with connections to the local sewer. This discharge is in violation of Derm's Zero Discharge Certification. Wastewater flowing to the sump from the chlorine manufacturing and bottling area was highly concentrated, creating a potential for discharge violations prohibited by OC San's Wastewater Discharge Regulations. As a result of the observed unauthorized discharges, OC San issued Derm an Order to Cease Non-Compliant Discharge and to Cease Discharge without a Valid Permit. In the letter, OC San listed several specific discharge prohibitions related to the concentrated chlorine product and directed Derm to attend a Compliance Meeting in March 2020. However due to state and local guidance's resulting from the COVID-19 pandemic, the Compliance Meeting was postponed to a later date.

July 1 – December 31, 2020

Derm provided notice and photographs that the connection from the floor drains in the chlorine manufacturing and bottling area were disconnected from the underground sump.

OC San will conduct a Compliance Meeting with Derm during the next reporting period and will continue to monitor Derm's compliance status.

Diamond Environmental Services (Permit No. 1-600244)

Diamond Environmental Services (Diamond) is a supplier of temporary fencing, portable toilets, portable sinks. Wastewater is generated from the washing and cleaning of portable toilets. The wastewater is routed to an underground clarifier before discharge to the sewer. Pretreatment consist of manual addition of pH adjustment chemical.

July 1 – December 31, 2020

On **July 29, 2020**, Diamond had a pH violation during an OC San routine inspection and sampling event, for which a Notice of Violation was issued on **August 13, 2020**. On **September 8, 2020**, a

compliance inspection was conducted by OC San as a result of the pH violation. During the inspection it was found that the pH alarm was inoperable while Diamond discharged wastewater not compliant with pH effluent limits. OC San determined that Diamond's manual pH adjustment of industrial wastewater was inadequate for the facility to maintain long-term compliance. As a result of the recent violation and the facility treatment system deficiency, Diamond was required to install a 24-hour continuous pH data logger at the sample point, by **December 18, 2020**. In addition, Diamond was required to submit a proposal to OC San by **December 18, 2020** for an automatic batch pH adjustment system and an automatic shutoff valve installed with audible and visual alarms to prevent pH non-compliant discharges from entering OC San's sewerage facilities. Diamond was also required to complete other corrective actions including maintaining spare equipment, performing routine maintenance and calibration of pH equipment, and applying best practices in site housekeeping. Diamond was required to complete the installation of the pH system by January 31, 2021.

OC San will evaluate Diamond's compliance with these requirements during the next reporting period.

Dr. Smoothie Enterprises - DBA Bevolution Group (Permit No. 1-600131)

Dr. Smoothie Enterprises – DBA Bevolution Group (Dr. Smoothie) processes, packages, and distributes fruit beverage concentrates. The operations performed include mixing of concentrates manufactured offsite, packaging, and distribution.

In November 2018, Dr. Smoothie had a minor pH violation. In December 2018, OC San conducted a Compliance Inspection and resampling during which OC San indicated that pH treatment may be necessary to ensure consistent compliance, particularly since the pH levels of some of the fruit concentrate products they process are below the local limit of 6.0 S.U. The resampling result showed another pH violation.

In March 2019, OC San held a Compliance Meeting with Dr. Smoothie during which the company reported that they have implemented manual pH adjustment on all wastestreams that are found to be acidic, with future plans to install a large (500 gallon) collection tank where the acidic wastestreams can be collected and treated with an automated pH adjust system. In August 2019, Dr. Smoothie had another pH violation. In October 2019, OC San issued a Compliance Requirements Letter requiring Dr. Smoothie to attend a Compliance Meeting which was held at the end of the month. During the meeting, Dr. Smoothie indicated that they are continuing manual pH adjustment; however, with the ongoing pH violations, Dr. Smoothie proposed installation of an automated pH adjustment system.

In April 2020, Dr. Smoothie had another pH violation. In May 2020, following Dr. Smoothie's continued pH noncompliance, OC San issued a Compliance Requirements Letter requiring installation of the automated pH adjustment system. In June 2020, Dr. Smoothie submitted a proposal for the pH adjustment system.

July 1 – December 31, 2020

During site inspections, OC San noted that the automated pH adjustment system had been installed but improvement to the sample point had not been completed. On **September 8, 2020**, OC San issued a Compliance Requirement Letter to address the sample point issue, followed by another Compliance Requirement Letter issued on **October 27, 2020** addressing other site compliance issues including maintenance of the pH chart recorder, equipment redundancy, and a maintenance activity logbook. On **October 12** and **November 18, 2020**, Dr. Smoothie had further pH violations, for which a Notice of Violation was issued on **October 29, 2020** and **November 24, 2020**, respectively.

OC San will conduct further enforcement during the next reporting period to follow up on Dr. Smoothie's recurring pH violations and sample point improvement.

Electrode Technologies, Inc. dba Reid Metal Finishing (Permit No. 1-511376), formerly listed as Reid Metal Finishing

Electrode Technologies, Inc. dba Reid Metal Finishing (Reid) is a metal finisher providing chromic anodizing, passivation, hard anodizing, sulfuric anodizing, chem film, and plating services of stainless steel, aluminum, copper, brass, bronze, and zinc die castings. Reid processes products for the aerospace, military, medical, and commercial industries. Wastewater is generated from the rinses used in the various surface finish processes and air scrubber wash water. Reid's pretreatment system consists of chrome reduction, cyanide destruction, hydroxide precipitation and sludge filtration.

In September 2019, Reid had a cadmium monthly average discharge limit violation. Reid could not determine the source of the violation, and it was noted that previous and post-violation sampling results had been well below daily and monthly limits. In January 2020, Reid had another cadmium monthly limit violation. As a result of these violations, Reid evaluated their cadmium treatment procedures, and conducted a 30-day pilot test utilizing a plate-out system for additional cadmium treatment. In May 2020, Reid had another cadmium monthly limit violation.

July 1 – December 31, 2020

In the months of **July, August and October 2020**, Reid had further cadmium monthly average discharge limit violations. OC San issued Notices of Violation for the May and July 2020 cadmium monthly limit exceedances on **November 12, 2020** and for the August monthly limit violation on **December 3, 2020**. Reid's investigation and pilot test results concluded that an additional and larger plate-out system would reduce the cadmium concentration of the few cadmium rinses prior to being comingled with other wastestreams in the equalization tank. Reid submitted a proposal to implement the second plate-out system, which OC San accepted on **November 17, 2020**.

OC San will issue a Notice of Violation for the **October 2020** cadmium monthly limit exceedance and conduct a Compliance Inspection to verify installation of the plate-out system during the next reporting period.

Electrolurgy, Inc. (Permit No. 1-071162)

Electrolurgy, Inc. (Electrolurgy) is a large job shop specializing in metal finishing services for aerospace, electronics, industrial, medical, and military/defense applications. The wet processing of a typical aluminum part begins with alkaline cleaning/etching followed by deoxidation and anodizing, or by activation (zincate, copper strike, or nickel strike) and the specified surface finish (electroless nickel, cadmium, or tin plate). The processing of a typical steel part proceeds by alkaline cleaning, hydrochloric activation/descale followed by the specified surface finish (bright nickel, cadmium, copper, electroless nickel). Stainless steel parts generally receive alkaline cleaning followed by passivation or electropolishing. The processing of a typical copper part begins with alkaline and ultrasonic cleaning followed by sulfuric activation, copper strike, and nickel plate. All wet operations are conducted manually using basket, barrel, rack, or wire process techniques. Wastewater is generated from the various spent process solutions and associated rinses.

In August 2019, Electrolurgy had silver daily and monthly average discharge limit violations. In October 2019, OC San conducted a Compliance Inspection during which OC San informed Electrolurgy of the silver violation that was being processed by OC San for issuance. Following the inspection, OC San issued a Compliance Requirements Letter requiring Electrolurgy to implement corrective solutions to address the observed non-compliance issues at the facility. In November 2019, OC San received Electrolurgy's response to the silver violation, which failed to identify the source of the noncompliance. In December 2019, Electrolurgy submitted a response to OC San's October 2019 Compliance Requirements Letter, which also failed to satisfy OC San's requirements.

In January 2020, OC San issued a Compliance Requirement Letter requiring Electrolurgy to attend a compliance meeting. In February 2020, OC San held the Compliance Meeting with Electrolurgy, during which OC San attributed the compliance issues to an overall lack of control at the facility as demonstrated by the excessive hosing/piping, improper waste segregation, and changes to process without proper notification to OC San. In March 2020, OC San issued another Compliance Requirements Letter directing Electrolurgy to remove all excessive flex hosing, satisfy a qualified operator requirement, conduct a waste characterization and a water balance study, and submit monthly waste manifests and onsite chrome reduction procedure. In April 2020, OC San received Electrolurgy's initial response to the Compliance Requirements Letter. This response letter addressed some flexible hosing changes, waste manifest record-keeping practices, and a chrome treatment procedure. Electrolurgy also cited various sources of leaks/wasteful water use and requested an extension on the water balance submission. After reviewing the justification for the request made by Electrolurgy, OC San approved the request and granted the extension. In May 2020, OC San received Electrolurgy's water balance which failed to identify observed discrepancies in water use at the facility. OC San requested Electrolurgy to conduct two additional months of water balance study.

In May 2020, Electrolurgy had a zinc monthly average discharge limit violation.

July 1 – December 31, 2020

On **August 12, 2020**, OC San issued a Notice of Violation for the May 2020 zinc monthly limit exceedance. Electrolurgy failed to identify any source for this violation. On **September 17, 2020**, OC San issued a Compliance Requirements Letter directing Electrolurgy to submit a proposal by **October 31, 2020** to install an effluent meter and implement the approved proposal by **November 30, 2020**. On **October 5, 2020**, Electrolurgy submitted their response to the corrective action report indicating that all the items would be completed by the required deadline. On **November 19, 2020**, Electrolurgy requested an extension to complete the project. On **November 30, 2020**, OC San granted Electrolurgy an extension to complete the installation of the effluent meter.

OC San will evaluate Electrolurgy's compliance with this requirement during the next reporting period.

Electron Plating Inc. (Permit No. 1-021336)

Electron Plating Inc. (Electron) takes in metal parts from various customers and surface finishes them with chromate-based chem-filming, dye coloring, zinc plating, and aluminum anodizing. The parts come primarily from the automotive, home improvement (bathroom fixtures), and construction industries. Alkaline and acidic pre-cleaners are used, along with drag-out tanks after most process solutions, followed with running rinses. A standard continuous hydroxide-based pretreatment system is used for heavy metals removal, along with a hexavalent chrome reduction module with automated pH and ORP controls. A large lamella-type clarifier is used for solids settling, and a filter press is used for solids dewatering.

July 1 – December 31, 2020

On July 8, 2020 and August 12, 2020, OC San conducted inspections at Electron and found the chain link enclosure gate to the secured sample box was broken. Furthermore, in previous inspections, OC San observed runoff/stormwater accumulating in some areas of the facility, particularly the spill containment structure around the pretreatment system. During the inspection, Electron was reminded of OC San's prohibition on runoff/stormwater. On **September 8, 2020**, OC San issued Electron a Compliance Requirement Letter requiring the facility to repair or replace the security enclosure for the sample box by **October 15, 2020**. In addition, Electron was required to submit a proposal by **October 31, 2020** to mitigate stormwater and surface water from discharging to the sewer and install/implement the proposed solution by **November 30, 2020**.

Electron completed the repairs to the gate. OC San will evaluate Electron's compliance with the stormwater mitigation requirement during the next reporting period and continue to monitor the facility's compliance status.

Electronic Precision Specialties, Inc. (Permit No. 1-021337)

Electronic Precision Specialties, Inc. (EPSI) is a medium size plating job shop providing specialty coatings plus precious metals and standard electrolytic (cadmium, copper, nickel) plating services to the electronics and aviation industries, as well as the government and military. Wastewater is generated from the rinsing of parts after preclean and surface coating, plating operations, in addition to spent precleaners that are treated and discharged on site. Other spent process solutions are wastehailed offsite for reclamation (precious metals) or treatment at licensed treatment facilities. Wastewater treatment at EPSI consists of standard pH neutralization for non-metal bearing wastestreams, followed by clarification before discharge to the sewer, while metal bearing wastestreams (primarily rinse water) are treated using three separate ion exchange (IX) systems for nickel, copper, and cadmium, and the treated water is recycled onsite. EPSI also operates a cyanide oxidation pretreatment system for non-reclaimed rinsewater from its precious metals / silver plating line, followed by a silver recovery module that recycles back to the rinse tanks. IX regeneration is performed on-site, and the regeneration wastewater is collected and evaporated in a 500-gallon stainless steel tank, which is periodically cleaned, and the removed sludge is wastehailed offsite.

July 1 – December 31, 2020

In the month of **October 2020**, EPSI had a nickel monthly average discharge limit violation. OC San will issue a Notice of Violation for this monthly limit violation during the next reporting period and will continue to monitor EPSI's discharge and compliance status.

Excello Circuits Manufacturing Corporation (Permit No. 1-521855)

Excello Circuits Manufacturing Corp (Excello) fabricates printed circuit boards. The production of printed circuit boards includes copper foil lamination onto glass, epoxy, or plastic surfaces, as well as drilling, deburring, and sanding. Wet processes include electroplating (copper and tin), electroless copper plating, brown oxide, resist strip, etching, desmear, soldermask cleaning, alkaline cleaning, acidic cleaning, and associate rinsing. Excello utilizes both continuous and batch pretreatment systems. Treatment is completed using hydroxide precipitation in two mix tanks, clarification, and solids processing by a filter press.

In February 2020, Excello had a copper mass violation. This mass violation resulted from the discharge of three times the normal flow and three times the average copper concentration previously detected in Excello's discharge, which strongly indicates use of dilution to meet compliance with concentration limits. In March 2020, Excello had a pH violation. In April 2020, OC San conducted pH resampling and the results showed compliance. In May 2020, OC San conducted a Compliance Inspection to investigate the root cause of the copper and pH violations. Excello did not provide an adequate explanation for the unusually high flow (over 18,000 gallons) during the day of the copper mass violation. Excello attributed the pH violation to operator error. Excello reported that a new operator allowed overflow of acidic rinses, which slugged the treatment system, resulting in discharge of untreated flow into the sample point. To prevent future pH violations, Excello had installed a pH sensor and alarm to notify operators of any pH fluctuations.

July 1 – December 31, 2020

On **November 2, 2020**, OC San conducted a compliance inspection at Excello to (1) investigate the root cause of the copper mass violation that occurred in February 2020, (2) review the accuracy of the copper measurements in the batch treatment, (3) review the pH meters calibration records, (4) evaluate

the adequacy of the batch treatment system and the use of DTC, and (5) follow-up on the requirement to maintain a certified industrial wastewater operator onsite.

During the inspection, OC San requested documentation from Excello to demonstrate its compliance with the qualified wastewater treatment operator requirement as specified in the company's permit. Excello was reminded that the company must maintain certified personnel onsite when wastewater is being processed at the facility to ensure compliance with discharge limits. Excello failed to provide the required documentation. On **December 8, 2020**, OC San issued a Compliance Requirement Letter requesting Excello to address the above compliance issues. On **December 30, 2020**, Excello submitted a Corrective Action Report identifying the root cause of the copper violation and summarizing the actions taken by the company to maintain compliance with permitted discharge limits. Excello attributed the copper violation to incorrect flow reading reported on the February 2020 self-monitoring report, which was submitted by the company without investigating the flow discrepancy. Historically, typical discharge flows from Excello varies from 6,000 GPD to 7,000 GPD. However, on the day of the February 2020 copper mass violation, the reported flowrate was 18,805 gallons.

OC San will issue a Compliance Letter in the next reporting period requiring Excello to obtain a qualified operator and continue to monitor Excello's discharge and compliance status.

Fabrication Concepts Corporation Permit No. 1-011068)

Fabrication Concepts Corporation (Fabcon) is a job shop powder coating and fabrication facility broken into three divisions: creative, procession, and systems. Fabcon manufactures signage, shelving, and display units for various industries. Operations include washing, powder coating, painting, drying, machining, tumbling, and assembly. Wastewater is mostly generated from the powdercoating pre-wash and tumbling/deburring operations. Pretreatment consists of a continuous flow pH neutralization system and clarification for solids removal.

In April 2020, Fabcon had pH violations, as well as zinc daily and monthly average discharge limit violations. In May 2020, OC San conducted a Compliance Inspection during which Fabcon attributed the pH violations to faulty pH meters in the first and third chambers of the three-stage aboveground clarifier, resulting in a failure in the automated pH neutralization system. Fabcon indicated that they have not been able to identify the cause of the zinc violation. OC San informed Fabcon that zinc violations at powdercoating industries normally come from the discharge of spent iron phosphate solution to the sewer. Fabcon claimed that they wastehaul their spent phosphate solution every six to eight months. In June 2020, OC San issued a Compliance Inspection Summary and Requirements Letter requiring Fabcon to submit a corrective action report identifying the cause of the zinc violation and the efforts for achieving long-term compliance. Fabcon submitted the required corrective action report, which identified carryover of excessive solids accumulation in the iron phosphate tank and clarifier into the sample point as the root cause of the zinc violation. To maintain compliance with the discharge requirements, Fabcon committed to increasing the frequency of the pump out of the iron phosphate tank and clarifier from annually to semi-annually and performing a thorough pressure wash after emptying.

July 1 – December 31, 2020

On **July 2, 2020**, OC San issued a Notice of Violation for the April 2020 zinc monthly limit exceedance. On **August 7, 2020**, Fabcon submitted waste manifests for the offsite disposal of spent phosphate solution and waste solids from the clarifier for the last one and half years. On **August 8, 2020**, OC San double-checked the volumes wastehauled against the capacity of the phosphate tank and clarifier, and they were in alignment with the capacity of the phosphate tank and clarifier.

Fabcon had no further violations during this reporting period. OC San will continue to monitor Fabcon's discharge and compliance status on a quarterly basis.

GKN Aerospace Transparency Systems (Permit No. 1-531401)

GKN Aerospace Transparency Systems (GKN) manufactures glass and acrylic transparencies for the military and general aviation and automotive industries. Canopies, windows, windshields, and specialty lenses are manufactured from acrylic and glass base materials formulated and prepared on-site. Acrylic sheets are produced from a methyl methacrylate polymer and allowed to cure between gasketed sheets of glass. The finished sheets are ground down and polished/shaped in large circular chambers with water and abrasive powder to final customer specifications. Some transparencies are layered with various abrasive resistant and/or optical coatings.

During an inspection on October 8, 2020, OC San staff observed that the composite sampling device, which had been set up the previous day, had been tampered with, where the device had been moved and the evidence tape damaged on the sampler tubing and sample device. In addition, during inspections on October 7 and October 8, 2020, OC San staff noted potential discharge of surface runoff to the sample point, which is prohibited. OC San issued GKN a Compliance Requirement Letter on **November 16, 2020** requiring the facility to submit a proposal to mitigate stormwater and runoff from entering the sewer by December 31, 2020 and install the solution by **January 31, 2021**, as well as the requirement to take the appropriate action necessary to prevent disruption and/or tampering of OC San's sampling equipment.

OC San will evaluate GKN's compliance with these requirements during the next reporting period and continue to monitor the facility for compliance.

Golden State Pumping LLC (Permit No. 1-600975)

Golden State Pumping LLC (Golden State) receives, treats, and disposes of grease from food service interceptors, clarifiers, and grease traps within the Southern California Region. Wastes from food service establishments are hauled to the facility yard and treated with caustic and polymer to enhance separation. The solids are wastehauled and the separated water is discharged to the sewer. No yellow grease rendering operations are conducted onsite. The permit prohibits receipt of waste from industrial kitchens, car washing facilities, metal recycling yards, or other sources of industrial or hazardous wastes; and any generator sources outside of OC San's service area must have a profile submitted in advance to OC San for review and acceptance.

In March 2020, OC San conducted a joint inspection with the Anaheim Fire Department, Orange County Health Care Agency, and City of Anaheim Code Enforcement. During the inspection, OC San determined that Golden State had made modifications in their operations without written notification, including the addition of a boiler and grey water tank. The Anaheim Fire Department and Anaheim Code Enforcement staff also found violations related to building code and permitting. In May 2020, Golden State had a pH violation. In June 2020, OC San conducted a Compliance Inspection and detected another pH violation. During the inspection, OC San observed that Golden State lacked the ability to adjust or monitor the pH of the discharged wastewater. OC San also determined that Golden State had implemented additional process modifications including installation of a filter press and re-routing of process flows, without prior notification to and acceptance by OC San. As a result, OC San issued a Compliance Requirements Letter to Golden State to address the aforementioned compliance deficiencies.

July 1 - December 31, 2020

On **August 3** and **August 4, 2020**, Golden state had further pH violations, for which a Notice of Violation was issued on **August 20, 2020**. As a result of the recurring pH violations, on **August 10, 2020** Golden State was issued an Order to Cease Non-Compliance Discharge and required to attend a Compliance Meeting, which was held on **August 18, 2020**. During the Compliance Meeting, OC San discussed the multiple noncompliance issues at Golden State's facility including dilution, process changes without

notifying OC San, continued pH noncompliance, receipt of unauthorized waste, and bypass of treatment. OC San directed Golden State to submit a proposal to address the noncompliance issues, which Golden State failed to meet. On **October 8, 2020**, OC San issued a Compliance Requirements Letter with new completion dates for the pH chart recorder and proposal by a professional engineer for the installation of an automatic pH adjustment system and automatic shutoff valve. On **September 2** and **October 28, 2020**, Golden State had additional pH violations, for which Notices of Violation were issued on **October 1** and **November 12, 2020**, respectively. The **September 2** violation occurred during a Compliance Inspection on that same day. As a result of building code and zoning violations, Golden State was informed by the City of Anaheim that Golden State could no longer operate in the current building and would need to vacate by **November 30, 2020**. Thus, on **November 25, 2020**, OC San issued Golden State an Order to Cease Discharge instructing Golden State that Permit No. 1-600975 would be voided on November 30, 2020. On **December 1, 2020**, OC San issued Golden State another Order to Cease Discharge of wastewater to OC San's sewer without a valid permit.

OC San will continue to monitor Golden State's discharge and compliance status in the next reporting period.

Graphic Packaging International, Inc. (Permit No. 1-571314)

Graphic Packaging International, Inc. (Graphic Packaging) performs lithographic printing, cutting, folding, and gluing of paperboard. Industrial wastewater is generated from water used to rinse baking compounds from lithographic plates, water used to wash and rinse glue pots with citrus-based cleaner, and water used at each printing press.

In April 2020, Graphic Packaging had a pH violation. In June 2020, Graphic Packaging submitted their corrective action report to address the pH violation. Graphic Packaging attributed the violation to the use of citrus-based cleaner to rinse glue pots. Under normal facility conditions, the various combined wastestreams neutralize to the compliant pH range upon commingling. Graphic Packaging reported that the low flow conditions during the time of the violation due to a scheduled maintenance of the printing process while the Finishing Department was cleaning the glue pots resulted in a pH imbalance in the wastestream. To prevent future violations, the company will ensure that discharge will be stopped if all sources of wastewater are not simultaneously discharging to the sewer system.

July 1 – December 31, 2020

Graphic Packaging had no further violations during this reporting period. OC San will continue to monitor Graphic Packaging's discharge and compliance status on a quarterly basis.

Hi Tech Solder (Permit No. 1-521790)

Hi Tech Solder is a specialty processing shop performing hot air solder leveling of printed circuit boards. Wastewater is generated from the pre-cleaning and micro-etching processes and their associated rinses. Hi Tech Solder utilizes a batch and a continuous hydroxide precipitation pretreatment system.

In January 2020, Hi Tech Solder had a copper violation. In March 2020, OC San conducted a Compliance Inspection and resampling during which Hi Tech Solder reported that the copper violation was due to excessive solids buildup in the pretreatment system resulting in carryover of solids into the sample point. As a corrective action, Hi Tech emptied and cleaned all the vessels in the pretreatment system and installed cloth filters in the effluent holding tank discharge pipe and in the second stage of the downstream clarifier to prevent any suspended solids from getting into the third stage, which acts as the sample box. The resampling results showed another copper violation and a lead violation. These daily limits exceedances also resulted in copper and lead monthly average discharge limits violations in the month of March 2020. In April 2020, Hi Tech Solder had another copper violation, which also resulted in a copper monthly average discharge limit violation for that month.

In May 2020, OC San conducted a follow-up Compliance Inspection and resampling to investigate the source of the new lead violation and the recurrence of the copper violation. The resampling results showed further copper and lead violations. These daily limits exceedances also resulted in copper and lead monthly average discharge limit violations in the month of May 2020. As a result, OC San issued a Compliance Requirements Letter requiring Hi Tech Solder to conduct a multi-day compliance verification sampling in June 2020 to verify effectiveness of corrective measures implemented onsite. The results of the multi-day sampling showed compliance. However, OC San noted an increasing trend in the copper concentrations indicating inadequate control of the pretreatment system.

July 1 – December 31, 2020

On **July 2** and **August 20, 2020**, OC San issued a Notice of Violation for the April and May 2020 copper and lead monthly limit exceedances, respectively. On **July 14, 2020**, OC San issued a Compliance Inspection and Findings Requirements Letter requiring Hi Tech to submit the overdue Corrective Action Report, along with a proposal to implement Best Available Technology (BAT) to treat copper slug concentrations from the spent microetch solution. On **September 29, 2020**, OC San issued a follow up Compliance Requirement Letter due to Hi Tech's failure to submit the Corrective Action Report and BAT proposal.

On **October 14, 2020**, OC San issued an Order to Cease Non-Compliant Discharge and Reporting due to Hi Tech's continued failure to submit the required Corrective Action Report and BAT Proposal. On **October 27, 2020**, OC San held a Compliance Meeting with Hi Tech to discuss the past due requirements. On **November 18, 2020**, Hi Tech submitted the Corrective Action Report, in which Hi Tech informed OC San of its decision to wastehaul the spent micro-etch solution in lieu of installing a pretreatment system. On **November 23, 2020**, OC San issued a Compliance Meeting Summary and Requirements Letter regarding Hi Tech's decision to wastehaul the spent micro-etch solution and as a result, requiring the facility to maintain waste manifests onsite for OC San's review.

OC San will continue enforcement actions during the next reporting period and monitor Hi Tech's discharge and compliance status on a quarterly basis.

Hixson Metal Finishing (Permit No. 1-061115)

Hixson Metal Finishing (Hixson) is a large metal finishing job shop. Various metallic parts from the aviation, automotive, and electronics industries are received for surface finishing through aluminum chemfilm and dyeing, cadmium, copper, and nickel electroplating, stainless-steel passivation, as well as a multitude of chemical precleaning and surface activation processes. Wastewater is generated from the rinses used in the various surface finish processes and fume hood wash water. Pretreatment consists of cyanide destruction and chrome reduction followed by heavy metals precipitation using caustic soda for pH adjustment, coagulant injection, polymer/flocculation and solids settling in a lamella clarifier, and removal to a sludge thickening tank. Overflow from the clarifier is discharged to the sample box. The sludge from the clarifier is dewatered with a filter press. Filtrate from the filter press is plumbed to the heavy metals precipitation module for further treatment.

In December 2017 and through 2018, OC San issued Hixson multiple enforcement actions including Notices of Violation, compliance meetings, an Order to Cease Noncompliant Discharges, and a Settlement Agreement. The Settlement Agreement included administrative penalties for multiple discharge violations of cadmium, copper, chromium, nickel, as well as requirements to address pretreatment deficiencies identified by OC San in the facility including lack of operating procedures and lack of pretreatment system control and maintenance. In addition to the Settlement Agreement requirements, installation of an ion exchange system was necessary as a result Hixson's limits changing from Pretreatment Standards of Existing Sources (PSES) designation to Pretreatment Standards of New Sources (PSNS). In March 2019, Hixson's new permit limits under the Pretreatment Standards for New Sources (PSNS) became effective. In May and June 2019, Hixson had cadmium daily and

monthly average discharge limit violations. Hixson was unable to determine the source of the violation, and it was noted that most sampling results prior had been well below monthly average limits and daily average limits, as were the following samples.

In July 2019, OC San conducted a Compliance Inspection and resampling during which Hixson mentioned that the company was still fine-tuning various components of a new closed-loop ion-exchange (IX) system. The Hixson representative believed that production employees were generating carry-over from cadmium process tanks to rinse tanks not piped through the IX system, and therefore discharging to the continuous treatment system. Hixson informed OC San that they would alert and train production staff on proper BMP's as they pertain to cadmium plated parts, allowing for proper rinsing in the closed-loop IX system before moving to a different rinse tank. The resampling results showed compliance. In November 2019, Hixson had another cadmium violation.

In January 2020, OC San conducted a Compliance Inspection and resampling during which Hixson reported that they had installed cameras in the processing areas where cadmium plating tanks are present. Following installation of the cameras, Hixson was able to closely monitor plating employees and verify proper rinsing times. Hixson also held training with plating employees to discuss and reiterate proper rinsing protocols and required rinsing times; the resampling results showed compliance. In April 2020, Hixson had a silver violation. In June 2020, Hixson had another silver violation, which also resulted in a silver monthly limit violation. After reviewing video footage of the precious metals plating room for each violation date, Hixson had determined that a recently hired employee was improperly bypassing the required dragout tank following the silver strike processing tank and placing parts directly to a running rinse. Hixson re-trained the employee in correct rinsing protocols.

July 1 – December 31, 2020

On **August 13, 2020**, OC San issued a Notice of Violation for the June 2020 silver daily limit exceedance, and on **September 3, 2020**, OC San issued a Notice of Violation for the June 2020 silver monthly limit exceedance, both which had been addressed in the previous reporting period.

Hixson had no further violations during this reporting period. OC San will continue to monitor Hixson's discharge and compliance status on a quarterly basis.

Howmet Global Fastening Systems Inc. (Permit No. 1-021081)

Howmet Global Fastening Systems Inc. (Howmet) manufactures aluminum, titanium, and steel fasteners. Wastewater-generating processes include cadmium, copper, silver, nickel and zinc plating, potassium permanganate treatment, cyanide stripping, glycol lubricant coating, acid stripping, chromate conversion coating, deburring, quenching, miscellaneous cleaning (mop water), acid/alkaline cleaning, and air scrubbing. Howmet's continuous pretreatment system consists of pH adjustment, cyanide destruction, chromium reduction, clarification, and sludge dewatering using a filter press. Separate, dedicated pretreatment systems are used including electrowinning (for silver plating) and oil/water separation.

In February 2019, Howmet had cadmium and molybdenum violations. In June 2019, OC San conducted a Compliance Inspection and resampling, during which Howmet identified a lubricant product in use at the facility as the likely source of the molybdenum violation. The resampling results showed compliance. However, routine sampling conducted later that month showed another molybdenum violation. Howmet also exceeded its cyanide (amenable) monthly average discharge limit in June 2019. In August 2019, OC San conducted a Compliance Inspection during which Howmet detailed another operation that is a possible source of molybdenum, which was the cleaning of dip baskets with dry-film lubricant (containing molybdenum) in one of the rinses. Howmet had trained its staff to clean the baskets in the molten salt bath specifically designed for that purpose. In September 2019, Howmet submitted a corrective action report, which stated that the company had re-evaluated

the cyanide treatment equipment and replaced the ORP and pH measurement equipment to improve performance. In the same month, Howmet performed voluntary multi-day self-monitoring which yielded further molybdenum violations. In October 2019, Howmet was published as significantly non-compliant for the FY2018-2019 reporting period due to its chronic and acute molybdenum discharge violations. In November 2019, OC San issued a Compliance Requirements Letter requiring Howmet to attend a Compliance Meeting, which was held in December 2019. During the meeting, Howmet detailed efforts taken to date intended to improve compliance including employee training, replaced control and treatment equipment (ORP, pH and new microfiltration media), substitution of cooling tower additive to a non-molybdenum chemical, and the implementation of on-site laboratory molybdenum testing of the suspect solutions prior to discharge. Howmet submitted a letter summarizing the afore-mentioned corrective actions following the Compliance Meeting.

In February 2020, Howmet had another cyanide (amenable) violation, which also resulted in a cyanide (amenable) monthly average discharge limit violation. In April 2020, Howmet had further cyanide (amenable) and cyanide (total) monthly limit violations. OC San conducted a compliance inspection and resampling during which Howmet attributed the violation to a probe that failed, which had since been replaced. The resampling results showed compliance.

July 1 – December 31, 2020

On **July 23, 2020**, OC San issued a Notice of Violation for Howmet's April 2020 cyanide (total and amenable) monthly limit exceedances, which had been addressed in the previous reporting period. On **October 22, 2020**, Howmet was published in the newspaper as Significantly Non-Compliant for the FY2019-2020 reporting period due to its February 2020 acute cyanide (amenable) violation.

Howmet had no further violations during this reporting period. OC San will continue to monitor Howmet's discharge and compliance status on a quarterly basis.

Joint Forces Training Base, Los Alamitos (Permit No. 1-031270)

Joint Forces Training Base, Los Alamitos (JFTB) is an active military base and command center with sanitary flows, equipment and aircraft washing, and fly breeding operations.

On **September 10, 2020**, OC San issued JFTB a Compliance Requirement Letter to complete past due effluent meter calibrations from 2019 and 2020 and submit the associated reports. JFTB required additional time to procure services necessary to complete the effluent meter calibration and developed a scope of work and contract in November and December 2020. JFTB expected to complete the calibrations in January 2021.

OC San will evaluate Active Plating's compliance with this requirement during the next reporting period.

La Habra Bakery (Permit No. 1-031029)

La Habra Bakery is a highly automated bakery that mixes dough, bakes, packages, and ships baked goods to retail outlets. Products include bread, buns, English muffins, and doughnuts. Wastewater is generated from washing, rinsing, and sterilization of the mixing tanks and associated cookware with alkaline soaps, detergents, and cleaners. Wastewater pretreatment includes an in-ground clarifier, continuous pH control system and effluent flow monitoring system.

In June 2020, La Habra Bakery had pH violations.

July 1 – December 31, 2020

On **July 2, 2020**, OC San issued a Notice of Violation for the June 2020 pH violations. On **July 22, 2020**, OC San conducted a Compliance Inspection during which La Habra Bakery submitted their corrective action report. In the report La Habra Bakery indicated that the failure of the agitator gearbox caused the pH violations. Corrective actions included: (1) installation of a new agitator gearbox, (2) keeping a spare agitator on-site, and (3) implementation of system checks once per shift, which is three times per day.

La Habra Bakery had no further violations during this reporting period. OC San will continue to monitor La Habra Bakery's discharge and compliance status on a quarterly basis.

LM Chrome Corporation (Permit No. 1-511361)

LM Chrome Corporation (LM Chrome) is an automotive wheel plating facility. Wastewater-generating operations include alkaline cleaning, zincate stripping, zincating, acid activation, copper plating, electrocleaning, anti-tarnish, nickel plating, and chrome plating, and associated rinses. LM Chrome utilizes both batch and continuous pretreatment systems (PTS). The continuous PTS consists of cyanide destruction (stage 1 and 2), chromium reduction, neutralization, flocculation/settling, sludge holding, filter pressing, and final clarification. The batch treatment tank is used for manually treating spent cleaners.

In January 2020, LM Chrome had a lead violation, which also resulted in a lead monthly average discharge limit violation. In March 2020, LM Chrome submitted a response to the Notice of Violation issued for the aforementioned exceedances, stating the source of the lead violation was most likely the residual lead on a wheel received for plating. LM Chrome stated they would closely monitor lead concentrations. In June 2020, OC San conducted a Pre-Permit Renewal inspection during which OC San noted that during storm events, stormwater pooling in an uncovered portion of the pretreatment system area was being pumped to the pretreatment system, which is in violation of OC San's Ordinance. In addition, the lamella clarifier, located outside and uncovered, was also susceptible to stormwater intrusion and was noted to have severe deterioration and rusting. As a result, OC San issued a Pre-Permit Renewal Inspection Summary and Requirements letter directing LM Chrome to submit a proposal to mitigate stormwater discharge to the sewer, and a corrective action report to repair the lamella clarifier. In the stormwater mitigation proposal and clarifier corrective action plan submitted by LM Chrome, the company proposed to install a roof over the uncovered pretreatment system area and repair the lamella clarifier by removing all corroded areas and polish/treat it with an anticorrosive coating with epoxy fiberglass.

July 1 – December 31, 2020

On **October 12, 2020**, OC San verified the repairs made to the damaged portion of the lamella clarifier, which had been covered with a roof to prevent stormwater intrusion.

LM Chrome had no further compliance issues during this reporting period. OC San will continue to monitor LM Chrome's discharge and compliance status on a quarterly basis.

Logi Graphics, Inc. (Permit No. 1-031049)

Logi Graphics, Inc. (Logi) produces circuit boards to customer specifications and specializes in prototype and small volume orders. The manufacturing typically begins with cutting the copper clad materials, drilling, photoresist application, inner-layer circuit imaging, resist developing, sulfuric peroxide etching, and alkaline resist stripping. This is followed by brown oxide surface preparation and lamination. The holes are de-smear with sulfuric acid and made conductive through electroless copper plating. Outer-layer circuit development is conducted by either panel plate or pattern plate

processes. Panel plate proceeds with copper plating followed by photoresist application, circuit imaging, resist developing, tin/lead (resist) plating, sulfuric peroxide etching, and tin/lead stripping. Solder mask application and final surface finishing, such as hot air solder leveling and/or electrolytic nickel/gold plating, complete the wet processing.

In June 2019, Logi had a copper monthly average discharge limit violation. Logi was unable to identify a root cause for the violation and determined that it was not a recurring event as multiple samples in subsequent months showed copper concentrations below the monthly limit. In January 2020, Logi had another copper monthly limit violation. Logi has experienced a gradual slowdown in production and has been adjusting its pretreatment system to accommodate.

July 1 – December 31, 2020

On **September 3, 2020**, OC San issued a Notice of Violation for a June 2020 lead monthly limit exceedance. Logi was informed of the need to target monthly average limits versus daily discharge limits to ensure long-term compliance. Logi had no further violations during this reporting period. OC San will continue to monitor Logi's discharge and compliance status on a quarterly basis.

Manufactured Packaging Products (Permit No. 1-521793)

Manufactured Packaging Products (MPP) manufactures corrugated containers, primarily cardboard boxes for grocery, electronics, and retail industry packaging needs. Corrugated sheet stock is purchased from offsite vendors, and then run through flexographic printers using food grade inks of various colors. Finished containers are packaged for shipment to customers on pallets or stacked and shrink wrapped for shipment. Wastewater is generated from the washdown of the printer plates and ink containers on the printers during ink color changeouts. The water is collected in trenches to a sump and then pumped out to MPP's wastewater treatment system.

In April 2020, MPP had a copper violation. In May 2020, OC San conducted a compliance inspection during which MPP submitted their corrective action report attributing the violation to a faulty pH probe causing the pretreatment system to operate at a pH that was not optimal or correct for copper precipitation. MPP's corrective action consisted of replacing the defective probe, maintaining additional pH probes on site, and re-training the staff on proper operation of the treatment system. The resampling results showed compliance.

July 1 -December 2020

MPP had no further violations during this reporting period. OC San will continue to monitor MPP's discharge and compliance status on a quarterly basis.

Maruchan, Inc. – Deere-South (Permit No. 1-601021)

Maruchan, Inc. – Deere-South (Maruchan Deere) manufactures dried Japanese ramen noodle food products and packages them into plastic wrapping or polystyrene foam cups. Wastewater is generated by the drained condensation of the dried steamed noodles, and the cleaning of the equipment used in the production operation. Cleaning occurs at least once a day and includes the food processing equipment as well as the surrounding areas. Wastewater is discharged through collection components along the production lines, which are also cleaned daily. Pretreatment system at Maruchan Deere consists of a five-stage clarifier, located underground in front of the facility.

In April 2020, Maruchan Deere had pH violations. In June 2020, Maruchan Deere submitted a corrective action letter attributing the violation to the fermentation of food particles in the wastewater, resulting in an acidic wastestream with low pH. Maruchan Deere installed a pH adjustment system with data-logging capabilities as a corrective action to address the violation. In the same month, OC San

conducted a Compliance Inspection and confirmed that the pH adjustment system was operational and appeared to be properly maintained.

July 1 -December 2020

Maruchan Deere had no further violations during this reporting period. OC San will continue to monitor Maruchan Deere's discharge and compliance status on a quarterly basis.

McKenna Labs, Inc. (Permit No. 1-021422)

McKenna Labs, Inc. (McKenna) produces & packages various personal care products (lotions, gels, creams, liquids, scrubs, serums, oils & pastes). These products are blended on site according to specified recipes and packaged for sale to end users. The blending and packaging equipment is washed & sanitized using sodium hypochlorite.

In January 2020, McKenna had a zinc violation. In March 2020, OC San conducted a Compliance Inspection and resampling during which McKenna reported that they had been processing and packaging sunblock which contained zinc oxide. As a corrective measure, McKenna has evaluated their waste management practices and made changes to minimize the discharge of zinc oxide to the sewer. The resampling results showed compliance.

July 1 – December 31, 2020

On **October 22, 2020**, McKenna was published in the newspaper as Significantly Non-Compliant for the FY2019-2020 reporting period due to its January 2020 acute zinc violation. OC San discussed increasing McKenna's zinc self-monitoring frequency with the company in the next reporting period. McKenna had no further violations during this reporting period.

OC San will continue to monitor McKenna's discharge and compliance status during the next reporting period.

Meggitt (Orange County), Inc. (Permit No. 1-601115)

Meggitt (Orange County), Inc. (Meggitt) produces sensing and monitoring systems that measure physical parameters in the extreme environments of aircraft, space vehicles, power generators, nuclear, oil and gas installations, and test laboratories. Processes used in manufacturing operations include, but are not limited to, machining, sawing, coating, sandblasting, welding, brazing, and metal finishing. Parts worked on are made of Inconel, stainless steel, and tungsten. Wastewater-generating processes include electro-polishing, passivation, etching, filament cleaning, ceramic dicing, ceramic dimensional polishing, ceramic tumbling, nickel bath plating, parts washing, and emergency only discharge of non-contact cooling water from the annealing furnace operations. Wastewater generated from the ceramic dimensional polishing operation, as well as the spent silver nitrate solution from the ceramic tumbling are wastehauled offsite. Rinses from these and the other wastewater generating operations discharge to a three-stage polypropylene aboveground tank, in which sodium hydroxide is added in the first and third compartments for pH adjustment, as most of the wastestreams are acidic in nature. pH-adjusted effluent is collected in a 750-gallon holding tank to facilitate batch discharge sampling.

July 1 – December 31, 2020

On **November 20, 2020**, Meggitt had a lead violation, for which a Notice of Violation was issued on **December 17, 2020**.

OC San will conduct a Compliance Inspection during the next reporting period and will continue to monitor Meggitt's discharge and compliance status.

Micrometals Inc. (Permit No. 1-021153)

Micrometals Inc. (Micrometals) is a manufacturer of iron and iron/nickel inductor cores for use in power conversion and line filters for the electronics industry. The wastewater generated at Micrometals consists of vibratory deburring solutions, which is drained out of each bowl into a trench running through the wet process area, along with wastewater from two rinses prior to iron phosphate, plus small amounts of wash water from a sink in the shop. The wastewater is routed to a two-stage clarifier before discharge to the sewer.

July 1 – December 31, 2020

On **July 28, 2020**, Micrometals had a pH violation, for which a Notice of Violation was issued on **August 6, 2020**. On **August 19, 2020**, OC San conducted a Compliance Inspection during which Micrometals attributed the violation to operator error and accidental dumping of mop water into the tumbling drains. As a corrective action, the supervisors and operators were re-trained on chemical spill protocol. Micrometals had also started monitoring and recording the pH in the clarifier on a weekly basis.

OC San will continue to monitor Micrometals' discharge and compliance on a quarterly basis.

National Construction Rentals (Permit No. 1-600652)

National Construction Rentals (National) is a supplier of temporary fencing, barricades, portable toilets, restroom trailers, mobile storage containers, and temporary power poles. Wastewater is generated from the washing and cleaning of portable toilets and restroom trailers. The wastewater is routed to a three-stage underground clarifier before discharge to the sewer.

In February and March 2019, National had pH violations, and was issued Notices of Violation. In May 2019, OC San issued a Compliance Requirement Letter directing National to attend a Compliance Meeting to discuss the non-compliant pH discharges, as well as National's failure to submit several proposals and deliverables between December 2018 and February 2019. In June 2019, OC San held a Compliance Meeting with National during which the company indicated that the source of the pH violations was a chemical containing hydrochloric acid used in the portable toilet washing process. National had since discontinued the use of the chemical from the washing process. Following the Compliance Meeting, OC San issued a second Compliance Requirements Letter directing National to install an automated pH adjustment system, propose a stormwater mitigation plan to prevent stormwater from entering the three-stage clarifier as prohibited by OC San's Ordinance, and submit a Slug Discharge Control Plan.

In July 2019, OC San issued another Compliance Requirements Letter for National's failure to submit all of the information required in the previous Compliance Requirements Letter. In September 2019, as no proposals or plans had still been received, OC San issued an Order to Cease Non-Compliance. In this letter, National was directed to attend a Compliance Meeting. In October 2019, OC San held the Compliance Meeting with National, during which National stated that there had been a disconnect between staff and their two consultants as to who was responsible for various submittals. OC San reiterated the need for a stormwater mitigation plan and the required pH equipment. During the Compliance Meeting, OC San informed National of its intent to issue an Administrative Complaint but gave National the option to enter into a Settlement Agreement to settle the administrative fines related to the non-compliances. National agreed to settle the matter with OC San.

In November 2019, National had further pH violations. As a result, OC San issued National an Order to Cease Non-Compliant Discharges along with a requirement to attend another Compliance Meeting.

One of which had a pH below the State hazardous limit of 2.0 S.U. In the Compliance Meeting, National indicated that although the company had previously informed OC San that they would no longer use the chemicals that caused the pH to fall below 6.0 S.U., it was determined that an employee had inadvertently used one of these chemicals during toilet cleaning operations. OC San explained that since National's cleaning operations are not adequately controlled to achieve compliance with discharge limits, an automatic pH adjustment system would be required. OC San and National negotiated a revised settlement in the amount of \$22,000.00. In December 2019, OC San issued a Compliance Requirements Letter directing National to install an automatic pH adjustment system.

In January 2020, National submitted a proposal, which failed to satisfy OC San's requirements. In February 2020, OC San directed National to submit an updated proposal, which National provided to OC San later that month. In March 2020, OC San requested additional information and clarification but received no response from National. In April 2020, OC San entered into a Settlement Agreement with National, in which National was required to submit a pretreatment system proposal with a pretreatment system installation date of April 30, 2020, which National failed to meet. In May 2020, OC San issued an Order to Cease Non-Compliance with the reporting requirements, and to attend a Compliance Meeting. Following issuance of the Order, OC San conducted a Compliance Inspection, and National submitted a new pretreatment system proposal.

In June 2020, OC San held a Compliance Meeting with National to discuss the Non-Compliant reporting issues and the inadequate pretreatment system proposal. During the meeting, National clarified the proposal, and explained the reason for installing a mixed media filter and a calcite media filter after a 4,000-gallon batch tank. OC San suggested an automatic dosing pH adjustment system which limits the possibility of operational error. National submitted the required final pH adjustment system proposal later that month.

July 1 – December 31, 2020

On **July 2, 2020**, OC San accepted National's pH adjustment treatment system proposal, providing an installation date of **August 31, 2020**. On **October 5, 2020**, OC San conducted a combined pre-permit renewal and compliance inspection and confirmed the pH adjustment system installation was complete.

National had no further compliance issues during this reporting period. OC San will continue to monitor National's discharge and compliance status on a quarterly basis.

Newlight Technologies, Inc. (Permit No. 1-600888)

Newlight Technologies, Inc. (Newlight) is a manufacturer of polyester plastic granules using a proprietary biological process that consumes methane and produces plastic. Greenhouse gases are combined with a biocatalyst and the resultant biopolymer is purified and processed into a pellet. Wastewater is generated from the manufacturing process, clean in place processes, and general cleaning operations. Wastewater is collected in an equalization tank where the pH is adjusted and then discharged to the sewer.

July 1 – December 31, 2020

On **December 22, 2020**, Newlight had a copper violation, for which a Notice of Violation will be issued during the next reporting period.

OC San will conduct a Compliance Inspection during the next reporting period and will continue to monitor Newlight's discharge and compliance status.

Nor-Cal Beverage Co., Inc (Main) (Permit No. 1-021284)

Nor-Cal Beverages Co. Inc - Main (Nor-Cal Main) manufactures fruit juices, juice drinks, sports drinks, sparkling flavored water, and ready-to-drink teas. Fruit concentrates and other additives are blended in large tanks with demineralized / soft water, then dispensed into various size containers that are loaded onto high-speed conveyor and packaging lines. Wastewater is generated from flow into the clarifier for Nor-Cal Main which collects water from production area and tank farm wash out, refrigerated units and blend system washout and CIP operations, boiler blowdown, RO reject, and water softener treatment system regeneration. Wastewater is routed to a three-stage underground clarifier for pH adjustment and solids settling prior to discharge to the sewer.

In June 2020, Nor-Cal Main had a pH violation. OC San conducted a Compliance Inspection during which Nor-Cal reported that on the day of the violation, spilled product from containment area around product tanks in the basement was routed to the clarifier and the highly concentrated waste disturbed the pH adjustment system and caused the pH violation. OC San directed Nor-Cal Main to: (1) immediately change the mode of operation of the sump pump in the containment area from automatic to manual, (2) develop a slug control plan to resolve spill control and containment issues, (3) evaluate neutralization capacity of the system to ensure adequately sized, and (4) raise low setpoint of the pH adjustment system to provide additional margin of compliance.

July 1 – December 31, 2020

On **August 5, 2020**, OC San issued a Probation Order to Nor-Cal Main to address the violation that occurred in the last reporting period. The Probation Order required Nor-Cal Main to achieve interim compliance immediately, create and keep a maintenance chart by **September 15, 2020**, evaluate the existing pretreatment system and propose improvements by **October 15, 2020**, and develop a Slug Control Plan by **October 31, 2020**. On **October 29, 2020**, Nor-Cal Main submitted a proposal to upgrade and improve its wastewater treatment system. On **November 5, 2020**, OC San approved the proposal and at Nor-Cal Main's request, extended the implementation deadline. On **November 23, 2020**, Nor-Cal Main submitted an updated Slug Control Plan.

Nor-Cal Main had no further violations during this reporting period. OC San will evaluate Nor-Cal Main's compliance with the Probation Order requirements during the next reporting period.

Nor-Cal Beverage Co., Inc (NCB) (Permit No. 1-021283)

Nor-Cal Beverages Co. Inc - NCB (Nor-Cal NCB) manufactures fruit juices, juice drinks, sports drinks, sparkling flavored water and ready-to-drink teas. Fruit concentrates and other additives are blended in large tanks with demineralized / soft water, then dispensed into various size containers that are loaded onto high-speed conveyor and packaging lines. Wastewater is generated from the hot-fill production and clean-in-place (CIP) operations, cooling tower bleed-off, water softener regeneration, defrost units and trash compactor cleanup. Wastewater is routed to a three-stage underground clarifier with a continuous automatic pH adjustment and recording system.

In June 2020, Nor-Cal NCB had a pH violation. OC San conducted a Compliance Inspection and resampling, which detected another pH violation. During the inspection, OC San determined that product changeovers and associated CIP operations introduced highly concentrated waste into the clarifier that exceed the capacity of the pH adjustment system, thus resulting in a pH violation. OC San directed Nor-Cal NCB to: (1) monitor the clarifier during all product changeovers and manually adjust the pH as needed, (2) develop a slug control plan to resolve spill control and containment issues, (3) evaluate the neutralization system capacity and upgrade the system, and (4) raise the low setpoint of the pH adjustment system to provide additional margin of compliance.

July 1 – December 31, 2020

On **July 2, 2020**, OC San issued a Notice of Violation for the June 2020 pH violation. On **August 5, 2020**, OC San issued a Probation Order to Nor-Cal NCB to address the violation that occurred in the last reporting period. The Probation Order required Nor-Cal to achieve interim compliance immediately, create and keep a maintenance chart by **September 15, 2020**, evaluate the existing pretreatment system and propose improvements by **October 15, 2020**, and develop a Slug Control Plan by **October 31, 2020**. On **October 29, 2020**, Nor-Cal NCB submitted a proposal to upgrade and improve its wastewater treatment system. On **November 5, 2020**, OC San approved the proposal and extended the implementation deadline at Nor-Cal NCB's request. On **November 10 and 11, 2020**, Nor-Cal NCB had further pH violations, for which a Notice of Violation was issued on **November 24, 2020**. The pH violations were due to limited neutralization capacity of the existing pretreatment system. As an interim solution, Nor-Cal added another acid dosing pump and assigned staff to perform manual dosing to manage the sudden fluctuation of pH while the new system is being developed. On **November 23, 2020**, Nor-Cal NCB submitted an updated Slug Control Plan.

OC San will evaluate Nor-Cal NCB's compliance with the Probation Order requirements during the next reporting period.

Omni Metal Finishing, Inc (Building 4) (Permit No. 1-600981)

Omni Metal Finishing, Inc - Building 4 (Omni) performs electroplating, surface finishing, and painting of customer-supplied parts made of aluminum, brass, copper, inconel, mild and stainless steel, titanium, magnesium, and tungsten alloys. Part applications are primarily used in aerospace, commercial, and military/defense applications. Processing of a typical part is followed by alkaline cleaning, rinsing, surface finishing, drying, organic coating (painting), curing; and solvent mask removal if applicable. The wet operations are conducted manually by barrel, basket, hoist, rack, or wire process techniques. The effluent discharge at Omni is generated by the various spent process solutions and associated rinse wastestreams. Cadmium and chromium wastewater undergo electrowinning followed by a bank of anionic and cationic ion exchange columns. The pretreatment processes also include continuous treatment with hydroxide precipitation, lamella, filter press, two stage continuous cyanide destruct (via oxidation), and batch treatment.

July 1 – December 31, 2020

On **October 6, 2020**, Omni had a cadmium violation, for which a Notice of Violation was issued on **October 15, 2020**. This daily limit exceedance also resulted in a cadmium monthly average discharge limit violation for the month of **October 2020**.

OC San will issue a Notice of Violation for the October 2020 cadmium monthly limit exceedance and conduct enforcement during the next reporting period.

Only Cremations for Pets (Newport Beach) (Permit No. 1-601084)

Only Cremations for Pets (Only Cremations) is a pet crematorium. Along with standard cremation, Only Cremations performs aquamation of pets. Aquamation is a pet aftercare process which uses water in an alkaline hydrolysis process instead of flames. Sodium hydroxide and potassium hydroxide is injected with hot water for a 24-hour period to dissolve the pet remains. Once complete, a sand-like material is recovered, and the remaining liquid is discharged to the sewer. Carbon dioxide is injected in the event the pH reads above 12.0 S.U. on the aquamation unit interface.

In January 2020, Only Cremations had a pH violation. Only Cremations attributed the pH violation to operator error. Only Cremations reported that an insufficient amount of carbon dioxide was injected thus failing to reduce the pH to below 12.0 S.U., and the wastewater was discharged to the sewer

before the pH was verified. Only Cremations instituted additional mandatory verifications for all staff to perform prior to wastewater discharge. Only Cremations also programmed an alert on the aquamation unit interface to prevent a forced discharge if the pH is above 12.0 S.U.

July 1 – December 2020

Only Cremations had no further violations during this reporting period. OC San will continue to monitor Only Cremation's discharge and compliance status on a quarterly basis.

Performance Powder (Permit No. 1-521805)

Performance Powder precleans and powder coats aluminum and cold rolled steel parts brought in by outside customers, including very large and oversized parts such as metal cabinets and construction framework. Cleaning and surface treating process is performed in an automated conveyerized six-stage wash line which includes alkaline cleaning, iron phosphate surface conversion followed by city water rinse, DI water rinse and RO water rinse. Wastewater generated from rinsing stages of the wash line is pumped to a three-stage aboveground clarifier prior to discharge to the sewer.

July 1 – December 31, 2020

In the month of **October 2020**, Performance Powder had a zinc monthly average discharge limit violation.

OC San will issue a Notice of Violation for this monthly limit exceedance during the next reporting period, conduct enforcement as necessary and continue to monitor Performance Powder's discharge and compliance status.

Powdercoat Services, LLC (Bldg E / Plant 1) (Permit No. 1-600167)

Powdercoat Services, LLC (Powdercoat) performs surface prewash and conversion coating of aluminum and steel parts, prior to powder coat application per customer specifications. Building E houses the largest phosphate wash line for the company to process larger dimension parts. The line is automated with an overhead conveyor track and the process and rinse chambers are set up as recirculating spray. Powdercoat will continue to recycle the majority of wastewater generated and wastehaul the spent phosphate wash solution, with occasional discharges of DI rinse water from the last stage. Once the tank is ready for discharge, Powdercoat performs manual pH neutralization prior to discharging the wastewater.

In June 2020, Powdercoat had a pH violation.

July 1 – December 31, 2020

On **July 16, 2020**, OC San conducted a Compliance Inspection during which it was determined that the wash line was kept in operation while the wastewater in the batch discharge tank was being neutralized. Powdercoat was informed that phosphate wash line must be completely taken out of service prior to performing pH neutralization and until the treated batch is completely discharged. On **July 29, 2020**, Powdercoat submitted a corrective action letter stating that the company had updated their pH neutralization procedures accordingly.

Powdercoat had no further violations during this reporting period. OC San will continue to monitor Powdercoat's discharge and compliance on a quarterly basis.

Prudential Overall Supply (Permit No. 1-071235)

Prudential Overall Supply (Prudential) is in the business of garment rental and cleaning and operates a number of facilities throughout the United States. The facility in Irvine is equipped with automated laundering machinery and specializes in cleaning and redistribution of uniforms, mats, napkins, and aprons at an average rate of 24,800 pounds of laundry per day. Prudential does not operate a pretreatment system, but instead utilizes a collection basin used for suspended solids separation and a multi-stage underground clarifier. Wastewater from the facility is discharged into the open-topped-below-grade basin from which it is pumped through a screen shaker to remove lint and larger solids. After passing through the shaker, wastewater is discharged back into the basin where it flows by gravity through a multi-stage underground clarifier before discharging to the sewer system. The sample point is the final stage of the clarifier.

In July 2019, OC San issued a Compliance Requirements Letter to address Prudential's compliance issues pertaining to stormwater management and potential discharge of solids to the sewer from the shaker screen system by October 2019. Prudential requested an extension of the due date to determine the most appropriate path forward.

In January 2020, Prudential proposed to add a section of aluminum canopy to an existing structure to prevent rainwater from entering the process water pit and shaker screen. In February 2020, Prudential informed OC San of the completion of the stormwater mitigation project. In subsequent inspection visits, OC San has confirmed that the stormwater mitigation system is in place and appeared to be in proper condition.

July 1 – December 31, 2020

Prudential had no further noncompliance issues during this reporting period. OC San will continue to monitor Prudential's discharge and compliance status on a quarterly basis.

Q-Flex, Inc. (Permit No. 1-600337)

Q-Flex, Inc. (Q-Flex) is a manufacturer of single-sided, double-sided, multi-layer flex, flexible heaters, rigid flex, and sculptured flex printed circuit boards that are used in the aerospace, telecommunications, medical, government, and military applications. Q-Flex specializes in prototypes and exotic designs using a wide range of materials and support services. Q-Flex outsources its' printed circuit board plating process. Wastewater is generated from micro-etching, film developing, and screen washing.

In June 2020, Q-flex had a copper monthly average discharge limit violation.

July 1 – December 31, 2020

On **September 3, 2020**, OC San issued a Notice of Violation for the June 2020 copper monthly limit exceedance. On **September 22, 2020**, Q-flex had a silver violation, for which a Notice of Violation was issued on **October 8, 2020**. This daily limit exceedance also resulted in a silver monthly average discharge limit violation, for which a Notice of Violation was issued on **December 3, 2020**. Q-Flex had reduced the usage of the silver-producing artwork and film developers, due to the installation of a laser direct imaging machine which does not generate any wastewater. When the artwork and film developers were used for the first time since the addition of the laser direct imaging machine, the rinse chamber wastestream from the developer (which is typically wastehauled), had generated a buildup of silver and was released to the batch treatment system. As a corrective action, Q-Flex increased their routine cleaning and maintenance of the artwork developer.

OC San will continue to monitor Q-Flex's discharge and compliance status on a quarterly basis.

Quality Aluminum Forge, LLC (Cypress North) (Permit No. 1-521833)

Quality Aluminum Forge, LLC (Cypress North) (QAF-North) produces aluminum alloy aerospace forgings. The major manufacturing process equipment consists of forging units, ovens, a heat treat (quench) tank, and a surface preparation/etch line. The forging units are used to drop forge the aluminum parts. Various cycles of forging, heating, etching, and quenching are used to form the metal and obtain the desired metallurgical properties. The wastewater generated from the etch process consists primarily of the rinse waters. Wastewater is treated in a continuous treatment system with pH adjustment, solids settling, filter press, and a clarifier.

July 1 – December 31, 2020

During routine inspections in March, June, and August of 2020, OC San noted QAF-North's practice of routing concentrated waste directly to the continuous treatment system instead of batch treating the waste first. This practice has been proven to be inadequate and cause noncompliance issues. Hence, on **October 8, 2020**, OC San issued a Compliance Requirements Letter requiring QAF-North to submit a proposal for the management of concentrated waste. QAF-North elected to wastehaul concentrated waste while developing the proposal and has been given an extension to respond in the next reporting period.

OC San staff will continue to monitor QAF-North's discharge and compliance progress during the next reporting period.

Quality Aluminum Forge, LLC (Cypress South) (Permit No. 1-600272)

Quality Aluminum Forge, LLC (Cypress South) (QAF-South) produces aluminum alloy aerospace forgings. The major manufacturing process equipment consists of forging units, ovens, a heat treat (quench) tank, and a surface preparation/etch line. The forging units are used to drop forge the aluminum parts. Various cycles of forging, heating, etching, and quenching are used to form the metal and obtain the desired metallurgical properties. The wastewater generated from the etch process consists primarily of the rinse waters. Wastewater is treated in a continuous treatment system with pH adjustment, solids settling, filter press, and a clarifier.

In August 2019, OC San conducted a Compliance Inspection during which multiple compliance deficiencies were noted including incorrect tank labeling, the accumulation of excessive solids in the sample box, and slug loading of the continuous treatment system with concentrated wastewater. In September 2019, OC San issued a Compliance Requirements Letter directing QAF-South to correct the deficiencies. In November 2019, OC San conducted a follow-up Compliance Inspection and noted that while the tanks had been labeled and the solids were removed from the sample box, the remaining requirements had not been completed.

In March 2020, OC San conducted another Compliance Inspection and noted that the process and pretreatment lines were still not labeled. QAF-South continued to develop the proposal and design for the installation of a control system for the concentrated waste injection into the continuous treatment system.

July 1 – December 31, 2020

On **August 14, 2020**, QAF-South had a pH violation, for which a Notice of Violation was issued on **August 27, 2020**. QAF-South responded with corrective actions, which included periodic pH monitoring, operator training, and sample point clean-outs; however, a cause for the violation was not determined. During a Compliance Inspection, OC San noted QAF-South's practice of routing concentrated wastes through the continuous treatment system, which may have overwhelmed the automatic pH adjustment system. As a result, on **October 8, 2020**, OC San issued a Compliance Requirements Letter requiring QAF-South to submit a proposal for the management of concentrated

waste and installation of a pH chart recorder and automatic shutoff valve to prevent pH non-compliant discharges. QAF-South determined to waste-haul concentrated waste while developing the proposal and has been given an extension to respond in the next reporting period.

OC San staff will continue to monitor QAF-South's discharge and compliance status during the next reporting period.

Rainbow Disposal Co., Inc. (Building A) (Permit No. 2-600238)

Rainbow Disposal Co., Inc. Building A (Rainbow-A) operates a municipal waste transfer station that collects residential and commercial refuse. Wastewater is generated from the washing of flatbed trucks in a covered bay. The wastewater is routed to an underground three-stage clarifier before discharging to the sewer.

In December 2019, Rainbow-A had pH violations. In February 2020, OC San conducted a Compliance Inspection and resampling. The resampling detected another pH violation. Rainbow-A responded with corrective actions including clarifier clean-outs on a quarterly basis, pH monitoring and adjustment, and a pH logging. As a result of these violations, Rainbow-A has been designated a significant industrial user on the basis that it has the reasonable potential to violate pretreatment standards or requirements. Therefore, the Class II Permit was closed out and a Class I Permit (1-601086) was issued to Rainbow-A in June 2020.

July 1 – December 31, 2020

On **July 14, 2020**, OC San issued a Notice of Violation for the February pH noncompliance. In lieu of installing a pretreatment system, Rainbow-A began wastehauling all wastewater collected in the clarifier and requested to close the permit account after providing information that the sewer connection from the clarifier had been severed and wastewater discharge had ceased. Rainbow-A's wastewater discharge permit was closed out on **August 3, 2020**.

Rainbow Disposal Co., Inc. (Building F) (Permit No. 2-600239)

Rainbow Disposal Co., Inc. (Building F) (Rainbow-F) operates a municipal waste transfer station that collects residential and commercial refuse. Wastewater is generated during the washing of various metal bins and plastic carts with a high-pressure hose and multi-purpose cleaner at the facility's bin and cart shop in Building F. Wastewater is collected from this operation in an in-ground three-stage clarifier before discharging to the sewer.

In February 2020, Rainbow-F had copper, lead, and zinc violations. As a result of these violations, Rainbow has been designated a significant industrial user on the basis that it has the reasonable potential to violate any pretreatment standard or requirement; therefore, the Class II Permit was closed out and a Class I Permit (1-601087) was issued to Rainbow-F on June 1, 2020.

July 1 – December 31, 2020

On **August 4, 2020**, OC San issued a Compliance Requirements Letter requiring the Rainbow-F to submit a pretreatment system proposal by **September 15, 2020** and complete installation by **October 31, 2020**. In lieu of installing a pretreatment system, Rainbow-F began wastehauling all wastewater collected in the clarifier and requested to close the permit account after providing information that the sewer connection from the clarifier had been severed and wastewater discharge had ceased. Rainbow-F's wastewater discharge permit was closed out on **October 13, 2020**.

Republic Waste Services (Permit No. 1-521827)

Republic Waste Services (Republic) washes the inside and outside of trash bins in a contained and partially covered area in the facility. Washwater is routed through a three-stage clarifier before discharge to the sewer. Clarifier maintenance includes regular skimming and annual pump out of the sludge buildup.

In October 2018, Republic had cadmium, copper, lead, and zinc violations. In November 2018, OC San conducted a Compliance Inspection and resampling during which Republic indicated that no operational changes had been made onsite and, therefore, they were not able to identify any internal source for the violations. The company indicated that the only possible source would be from illicit materials disposed of in trash bins prior to washout, such as sand blasting dust or batteries. Republic pumped out the clarifier as part of their corrective action. The resampling results showed compliance.

In July 2019, Republic had chromium, copper, lead, nickel, and zinc violations again. In August 2019, OC San conducted a Compliance Inspection during which Republic attributed the violations to excessive solids buildup in the clarifier and carry over of the solids to the sample point. As a corrective action, Republic increased frequency of their clarifier pump-out from quarterly to monthly. OC San increased frequency of Republic's heavy metals self-monitoring to monthly. In October 2019, Republic was published as Significantly Non-Compliant for the FY2018-2019 reporting period due to acute cadmium, copper, lead, and zinc discharge violations during that fiscal year. In November 2019, Republic had another copper violation. In December 2019, OC San conducted a Compliance Inspection during which Republic attributed the violation to degradation of copper tubing attached to the heated pressure washer used in washing the trash bins; Republic had since replaced the deteriorated tubing. OC San issued an Order to Cease Non-Compliant Discharges and directed Republic to attend a Compliance Meeting.

In January 2020, OC San held a Compliance Meeting with Republic during which Republic stated that it will increase the frequency of clarifier pump-out from quarterly to monthly to resolve the non-compliances. Following the meeting, OC San issued a Compliance Requirements Letter requiring Republic to increase the frequency of heavy metal self-monitoring from monthly to weekly to evaluate the effect of more frequent clarifier cleaning, for the first quarter of 2020. The results of the weekly self-monitoring showed compliance.

July 1 – December 31, 2020

Republic had no further violations during this reporting period. OC San will continue to monitor Republic's discharge and compliance status on a quarterly basis.

Republic Waste Services of So. Cal. LLC (Permit No. 1-021169)

Republic Waste Services of So. Cal. LLC (Republic SoCal) washes and maintains garbage trucks, which are emptied at an adjacent reclamation facility. The wash water is collected in a trench and is directed to a three-stage underground clarifier for capture and removal of solids prior to discharge to the sewer.

July 1 – December 31, 2020

On **September 9** and **September 10, 2020**, Republic had pH violations, for which a Notice of Violation was issued on **October 8, 2020**. On **November 30, 2020**, OC San issued an Order to Cease Noncompliance for Republic SoCal's failure to allow OC San site access to conduct inspection and to address wastewater flooding and bypass issues at the facility. On **December 15, 2020**, OC San held a Compliance Meeting with Republic SoCal to address the aforementioned violations.

OC San will continue enforcement during the next reporting period and will continue monitoring Republic SoCal's discharge and compliance status.

Scientific Spray Finishes, Inc. (Permit No. 1-031311)

Scientific Spray Finishes, Inc. (Scientific Spray) is a powdercoater. It has three conveyerized powdercoating lines but only two contain wet processes. Once parts are loaded on the line, they are first washed in a detergent, then rinsed, and an iron phosphate solution applied. There is no rinsing following the iron phosphate application. The parts are then thermally dried, powder applied, baked on and unracked.

Scientific Spray Finishes has four manual spray booths and one large oven that can accommodate rolling racks and large parts. Scientific Spray Finishes chemically strips its own hooks, and performs sandblasting on small parts in a standup, enclosed, unit. Scientific Spray Finishes does not have a pretreatment system. Both lines discharge rinsewater to a common sump. Wastewater from the paint strip unloading area also flows to the sump. There is an open/uncovered area which also flows to the sump.

July 1 – December 31, 2020

During a routine inspection and sampling on **September 8, 2020**, OC San noted that the sampling device has been tampered with and that Scientific Spray did not have records or manifests for wastehauling of its spent phosphate solution. Additionally, OC San noted visible external discharge to the sample point including surface runoff and various solid debris from surrounding open area. As a result, on **September 29, 2020**, OC San issued an Order to Cease Non-Compliant Discharges and required Scientific Spray to attend a Compliance Meeting. On **October 14, 2020**, OC San held the Compliance Meeting with Scientific Spray to discuss the company's noncompliance issues. On **October 22, 2020**, OC San conducted a Compliance Inspection. On **October 30, 2020**, OC San issued a Compliance Meeting Summary and Requirements Letter requiring installation of a hard-plumbed representative sample point, preventing unauthorized discharge of surface runoff.

OC San will continue enforcement during the next reporting period and will continue monitoring Scientific Spray's discharge and compliance status.

Simply Fresh, LLC (Permit No. 1-600709)

Simply Fresh, LLC (Simply Fresh) produces various refrigerated packaged foods including salsa, layered dip, hummus, and salad. Wastewater is generated from the cleaning, sanitizing, and processing of fresh vegetables and other ingredients, as well as general equipment, surface, and floors. All wastewater generated in the production area flows from floor drains to a four-stage underground clarifier.

In March 2020, Simply Fresh had a pH violation. OC San had determined that at an above average amount of acidic foods, such as tomatoes, were being processed on the day of the violation and the waste was improperly disposed of through the floor drains to the four-stage clarifier. OC San also noted that the four-stage clarifier was past due for pump-out and cleaning based on Simply Fresh's internal clarifier cleaning schedule. In June 2020, OC San requested that Simply Fresh submit a proposal for a continuous pH monitoring system located at the sample point to verify compliance during all hours of operation as Simply Fresh discharges wastewater over a 24-hour period.

July 1 – December 31, 2020

On **August 28, 2020**, OC San accepted Simply Fresh's pH monitoring system proposal. On **October 26, 2020**, OC San conducted a Compliance Inspection and confirmed the pH monitoring system

installation. During a pre-permit renewal inspection on **December 14, 2020**, OC San performed a review of the pH monitoring system and historical pH data and noted several instances of pH noncompliance. Thus, OC San reminded Simply Fresh that the pH adjustment system needs to be operational and maintained during all hours of discharge.

OC San will continue enforcement during the next reporting period and will continue to monitor Simply Fresh's discharge and compliance status.

Soldermask, Inc. (Permit No. 1-031341)

Soldermask, Inc. (Soldermask) is a printed circuit board job shop specializing in solder mask services and making stainless steel stencils used for solder paste application or component verification. Wastewater is generated by manual pumice scrubbing, photoresist developing, screen cleaning, and associated rinses. Soldermask does not have a pretreatment system apart from a four-stage aboveground clarifier. The spent ferric etch solution, electropolishing solution, and subsequent static rinses are wastehauled.

In March 2020, Soldermask had a nickel monthly average discharge limit violation. In June 2020, OC San staff conducted a compliance inspection and informational sampling during which it was determined that the source of nickel was from a rinse tank connected to an etcher process. OC San's informational sampling revealed that the nickel concentration was elevated and necessitated the permittee to install pretreatment equipment to properly treat the wastewater to ensure long-term compliance. Soldermask elected to modify the process and disconnect the nickel rinse from the sample point in lieu of installing additional pretreatment equipment.

July 1 - December 31, 2020

Soldermask had no further violations during this reporting period. OC San will continue to monitor Soldermask's discharge and compliance status on a quarterly basis.

South Coast Baking, LLC (Permit No. 1-600565)

South Coast Baking, LLC (South Coast Baking) is a frozen cookie dough manufacturer. The manufacturing process uses ingredients such as flour, sugar, chocolate, butter, and flavors. The facility also uses fruits such as raisins and cranberries. The manufacturing of frozen cookie dough occurs via 3 production lines. The raw materials are combined to make a dough which then heads to another "cookie former" line where the shape of the dough is defined in a cookie shape. This cookie-shaped dough is sent to a freezer where the dough is frozen. The end-product is frozen cookie dough inside master cases. Wastewater is generated during cleaning/sanitation activities. During cleaning/sanitation, equipment is scraped to remove heavy soils and then cleaned using soap and water.

In April 2020, South Coast Baking had a pH violation. In May 2020, OC San conducted a Compliance Inspection during which South Coast Baking indicated that excessive sanitation with low pH chemicals was the source of the violation. South Coast Baking submitted a corrective action report to address the pH violation later that month. The corrective action included installation of a pH adjustment system. In June 2020, South Coast Baking had another pH violation.

July 1 – December 31, 2020

On **July 14, 2020**, OC San issued a Notice of Violation for the June 2020 pH noncompliance. During routine inspections in July and August 2020, OC San confirmed that the new pH adjustment system had been installed and appeared to be properly maintained.

South Coast Baking had no further violations during this reporting period. OC San will continue to monitor South Coast Baking's discharge and compliance status on a quarterly basis.

South Coast Circuits, Inc. (Bldg 3500 A) (Permit No. 1-011069)

South Coast Circuits, Inc. (SCCI) manufactures rigid double-sided and multilayer printed circuit boards to customers' specifications from copper clad and pre-preg materials. SSCI perform their operations in four buildings all located within the same industrial complex (Bldg 3506 A, Bldg 3524 A, Bldg 3500 A, and Bldg 3512 A). Discharges from all buildings are regulated by separate permits.

The effluent discharge at Bldg 3500A under this permit is generated by the photoresist and solder mask developing solutions, and the rinses following the acid cleaning, aluminum oxide surface preparation, photo-film developing, photoresist developing, solder mask developing, and screen cleaning. Pretreatment consists of an automatic pH adjustment system. Spent process chemicals are transported to Bldg 3512A for batch treatment.

In May 2020, SSCI (Bldg 3500 A) had a silver monthly average discharge limit violation.

July 1 – December 31, 2020

On **August 6, 2020**, OC San issued a Notice of Violation for the May 2020 silver monthly limit exceedance. SSCI could not determine the cause of the slightly elevated silver concentration through review of production records.

SCCI (BLDG 3500 A) had no further violations during this reporting period. OC San will continue to monitor SSCI's discharge and compliance status on a quarterly basis.

SPS Technologies LLC, DBA Cherry Aerospace (Permit No. 1-511381)

SPS Technologies LLC dba Cherry Aerospace (Cherry) manufactures blind rivets for aerospace applications. Wastewater generating operations include plating, anodizing, washing and other metal finishing processes. Cherry also discharges aqueous fume scrubbing, cooling tower bleed, and boiler blow down. Cherry operates a continuous pretreatment system, which consists of flow equalization, chemical precipitation, clarification, coagulation, and dewatering.

In October 2019, OC San noted several areas onsite where stormwater commingles with regulated wastestreams or bulk chemicals and/or accumulates in the outdoor secondary containment structures. Once conveyed to the containment structures, stormwater is pumped to Cherry's pretreatment system, then ultimately discharged to the sewer. OC San informed Cherry that this practice is in violation of OC San's Wastewater Discharge Regulations Ordinance prohibition on stormwater discharges to the sewer.

In May 2020, Cherry had a copper mass violation and a copper monthly average discharge limit violation. In June 2020, OC San conducted a Compliance Inspection to investigate the source of the copper violation and discuss Cherry's unauthorized discharges of storm water to the sewer. At the time of the inspection, Cherry had not been able to identify the cause of the copper violation. As a result, OC San issued a Compliance Requirements Letter directing Cherry to submit a corrective action report identifying the root cause of the copper violation and the efforts for achieving long-term compliance. Cherry was also directed to submit a proposal to mitigate stormwater discharge to the sewer, along with the corrective action report, both of which Cherry submitted later that month.

July 1 – December 31, 2020

On **August 20, 2020**, OC San issued a Notice of Violation for the May 2020 copper monthly limit exceedance. On **September 23, 2020**, OC San held a Compliance Meeting with Cherry to discuss the scope and completion date of the requirement to mitigate stormwater and surface runoff discharge to the sewer. During the meeting, Cherry explained that according to their contractor's assessment, the project completion date could not be fully determined until Cherry had finalized engineering design and construction drawings for review and approval by the City of Santa Ana's Building Department, specifically related to electrical and/or plumbing requirements.

On **October 15, 2020**, OC San issued a Compliance Meeting Summary and Requirements Letter, in which OC San granted an extension for the proposal submittal and project completion but requested submittal of an interim proposal until a long-term solution could be implemented. Cherry submitted the interim proposal on **October 29, 2020**. On November 6, 2020, Cherry had a cadmium violation, for which a Notice of Violation was issued on November 24, 2020. On **December 17, 2020**, Cherry reported that the company had successfully implemented all proposed interim solutions concerning stormwater and runoff mitigation.

OC San will continue enforcement regarding the cadmium violation, and evaluate the interim solutions implemented by Cherry during the next reporting period.

Star Manufacturing LLC, dba Commercial Metal Forming (Permit No. 1-600653)

Star Manufacturing LLC, dba Commercial Metal Forming (Star) is a metal forming shop that specializes in stamping and forming metal tank heads on mechanical and hydraulic presses for use in the manufacture of vessels. Star's ancillary operations include plasma cutting metal blanks, plasma and oxyacetylene trimming, metal heat treating, pressure washing finished tank heads, welding, steam cleaning, and part washing. Wastewater is generated from the steam cleaning and washing of production pieces, which are typically coated with lubricant. Wastewater is collected in an underground sump and then pumped to an equalization tank from which the wastewater is gravity-fed through bag filters before discharge to the sewer.

In February and March 2019, Star had oil & grease violations. In March 2019, OC San conducted a Compliance Inspection to determine if Star had made any improvements to its existing treatment system. Star personnel stated that they were continuing to research various technologies to ensure long term compliance with their permit limits and requirements. Star was aware that the use of bag filters was inadequate as primary treatment to remove oil and grease. In April 2019, OC San issued a Compliance Requirements Letter requiring the submittal of a waste management proposal by May 2019, and installation of the proposed pretreatment system by June 2019 after acceptance by OC San. While Star met the deadline for submitting the proposal, they installed the system without prior acceptance from OC San. Star installed a zeolite multimedia filter tank equipped with a control valve that accommodates a backwash cycle to remove accumulated contaminants from the zeolite. However, the effectiveness of the backwash cycle using untreated gravity-fed water was unclear. In June 2019, Star had another oil & grease violation.

In July 2019, OC San conducted a Compliance Inspection and resampling during which OC San noted that Star had not made any further improvements to the treatment system using the zeolite filter media and lacked understanding of an appropriate preventative maintenance schedule to maintain compliance. The resampling detected an oil & grease violation. In August 2019, OC San issued a Compliance Requirements Letter directing Star to attend a Compliance Meeting, which was held in September 2019, to discuss implementation of corrective actions to develop and maintain an effective treatment system. Following the Compliance Meeting, OC San issued another Compliance Requirements Letter requiring Star to complete the installation of the proposed treatment system by October 2019. Star had since completed installation of the treatment system, improved the operation of the zeolite filter tanks, and added a treated wastewater holding tank. In October 2019, Star was

published as significantly non-compliant for the FY2018-2019 reporting period due to chronic and acute oil & grease of mineral or petroleum discharge violations during that fiscal year.

In March 2020, Star had another oil & grease violation. In May and June 2020, OC San conducted Compliance Inspections during which OC San has determined that the influent holding tank was structurally compromised and that Star was not testing every batch of treated wastewater prior to discharge. Between May and June, Star installed a second zeolite column to increase oil & grease removal efficiency and installed a new influent holding tank. Initial results from the second zeolite column have demonstrated improved removal efficiency. Star's permit was also revised to include weekly oil & grease monitoring and require Star to test every treated batch of wastewater for oil & grease prior to discharge.

July 1 – December 31, 2020

On **July 27, 2020**, Star had another oil & grease violation, for which a Notice of Violation was issued on **September 3, 2020**. Star's corrective actions included cleaning out the wash pit where sludge may have been collecting. Star continued to test every batch of treated wastewater. On **October 22, 2020**, Star had yet another oil & grease violation, for which a Notice of Violation was issued on **December 3, 2020**. On **October 26, 2020**, OC San conducted a Compliance Inspection. OC San noted that Star's self-monitoring sample, which was collected from the same batch that OC San sampled and detected the afore-mentioned violation, yielded non-detect results. OC San's sample was taken approximately 24 hours after Star's self-monitoring sample. To rule out analytical result inconsistencies because of disparate laboratory results, sampling techniques, or from the time delay between samples, OC San investigated further by conducting a study to compare oil & grease results from OC San laboratory and from Star's contract laboratory from the same split sample taken at the same time from a subsequent batch on **December 8, 2020**. Star's results showed non-detect while OC San's results showed 54.2 mg/L. Star plans to work with a consultant and send samples out to additional alternate labs to further investigate the sample result discrepancies.

OC San will continue investigation and enforcement during the next reporting period and monitor Star's discharge and compliance status.

Stepan Company (Permit No. 1-021674)

Stepan Company (Stepan) manufactures surfactants used in various consumer detergents, soaps, and other specialty blends. Stepan manufactures surfactants utilizing three processes: continuous falling film sulfonation, detergent blending by batch processing of alkanolamides, and detergent blending by batch processing of betaine. Pretreatment at the facility includes pH adjustment and batch oxidation of 1,4- dioxane.

In March 2020, Stepan had a 1,4-dioxane violation. In April 2020, OC San conducted a Compliance Inspection and resampling during which Stepan attributed the violation to inadequate residence time during pretreatment to fully oxidize the wastestream before release to the sewer. Stepan stated that it will ensure adequate residence time during pretreatment before discharge in the future. The resampling results showed compliance.

July 1 – December 31, 2020

Stepan had no further violations during this reporting period. OC San staff will continue to monitor Stepan's discharge and compliance status on a quarterly basis.

Stremicks Heritage Foods, LLC (Permit No. 1-021028)

Stremick's Heritage Foods, LLC (Stremick's) produces milk and water-based beverages and milk-based products. Products include homogenized whole milk, 2%, 1%, nonfat, cream, half-and-half,

chocolate, and other flavored drinks, almond milk, soy milk, rice milk, almond and coconut creamer, various flavors of nectar, and soft serve ice-cream mixes. Inside the facility production areas, wastewater is generated from the washing of equipment and floors. Stremicks has removed three production lines to add four new production lines that utilize purified water from a reverse osmosis system that also contribute to the wastewater discharge. The wastewater passes through one or two four-stage underground clarifiers (depending on the location in the plant) prior to the sample point. Additional wastewater is generated downstream of the clarifiers from washing the inside of tanker trucks after unloading bulk liquid ingredients and products. The wash pad is located outside in a bermed and roofed area. Other sources of wastewater that discharge through the sample point include boiler blowdown, cooling tower bleed-off, and water softener regeneration waste. The total flow from all industrial wastewater is captured by the open channel meter outside the facility gate.

Due to a pH issue in OC San's sewer system in the area downstream of Stremick's facility, OC San conducted 24-hour monitoring of Stremick's discharge in November 2019. The pH results indicated that the pH fell below 6.0 and above 12.0 S.U. on numerous occasions.

In January 2020, OC San conducted a Compliance Inspection during which Stremicks reported that equipment, floors, trucks, and piping throughout the facility are washed and cleaned with acids and/or bases to achieve proper disinfection. Stremicks stated that no treatment or equipment is used to achieve compliant pH levels and ensure long term compliance with OC San's pH discharge limits. OC San informed Stremicks that a pretreatment system would be required to maintain compliance with the pH discharge limits. Following the inspection, OC San issued a Compliance Inspection Summary and Requirements Letter requiring Stremicks to submit a proposal for an automatically controlled pH adjustment system by February 29, 2020, with an installation date, following OC San's review and acceptance, of no later than May 31, 2020.

In February 2020, OC San received a response letter and proposal from Stremicks. In the letter, Stremicks identified several systems throughout the facility in which cleaning and washing operations contribute to the large swings in pH. Stremicks proposed to install a diversion valve on each system to divert non-compliant wastewater to one of two holding tanks. As additional non-compliant wastewater is collected in each tank, the pH would be adjusted, either by manual addition of chemicals or by mixing from other waste streams and would be discharged to the sample point once the tank was full and pH has been verified to be in compliance. Stremicks also outlined a long-term proposal of an underground automatic pH adjustment system, which would require one to two years of planning, acquiring building permits, and construction.

In March 2020, OC San held a teleconference to discuss the pretreatment system proposal. During the teleconference, Stremicks discussed their proposal, and how the planned diversion valves would capture all non-compliant wastewater prior to being introduced to the waste stream. Stremicks also mentioned that a 24-hour continuous pH monitor was installed at the sample point to collect data and determine the time and location of additional non-compliant pH discharges. During the meeting, OC San agreed that the diversion of non-compliant wastewater to holding tanks for adjustment might be acceptable as a short-term solution; however, a continuous automatic adjustment system would be preferred for long-term compliance. In April 2020, Stremicks had two additional pH violations. As a result, OC San issued a Requirement to attend a Compliance Meeting based on the recent pH violations, and to discuss the pH adjustment pretreatment proposal.

In May 2020, OC San held the Compliance Meeting with Stremicks, during which Stremicks discussed their short-term pretreatment proposal, and how it would be sufficient to maintain compliance with OC San's pH discharge limits. Following the meeting, OC San issued a Compliance Meeting Summary and Requirements Letter. In the letter, OC San summarized the compliance meeting discussions, and requested clarification regarding certain aspects of the proposal such as wastewater flowrates, chemicals used in treatment, and how Stremicks planned to maintain interim compliance during system installation, as recent pH monitoring data still exhibited non-compliant discharges.

In June 2020, OC San received a letter from Stremicks, in which the company included all systems to be diverted to the holding/treatment tanks and corresponding flowrates, a revised floor plan, information on the computer programming system which would monitor and divert the non-compliant discharges, and confirmation of spare parts in case of equipment failure. The letter did not fully address how Stremicks would maintain interim compliance during system installation. Hence, OC San issued a Revised Pretreatment System Proposal Response Letter, in which OC San accepted the pH treatment system proposal with certain conditions. OC San required that Stremicks address the interim compliance during system installation, identify all waste streams that discharge to the sample point without pH adjustment, provide flowrates for those waste streams, and provide a revised facility plot plan. OC San reminded Stremicks that proper notification to OC San is required in advance of modifications to processes that affect the nature of discharged waste streams.

July 1 – December 31, 2020

On **August 10, 2020** OC San conducted a routine sampling and inspection event during which OC San noted issues with the interim pH adjustment system, including high level tank alarms and overflow risks, and pH probe “bleed” lines. OC San also provided comments on submitted figures and pH graphs. On **September 30, 2020**, OC San issued a Compliance Requirement Letter summarizing the August 10, 2020 inspection findings. In the letter, OC San requested a proposal for additional treatment measures for the interim system, and for modifications to figures and pH monitoring graphs. On **October 31, 2020**, OC San received a letter from Stremicks indicating that the company is working with a consultant to install a final pH diversion prior to the sample point, which would divert any non-compliant wastewater that bypasses the interim pH adjustment system and treat and reintroduce the wastewater to the wastestream. Stremick’s plans to submit the proposal to OC San in the following reporting period upon finalization with its’ consultants.

OC San will verify the pH adjustment system installation during the next reporting period and will continue to monitor Stremicks’ discharge and compliance status.

Superior Plating (Permit No. 1-021090)

Superior Plating is a medium-sized plating shop serving both aerospace (95%) and commercial (5%) customers. Wastewater generating operations include acid activation, alkaline cleaning, alkaline tin plating, black chromate, bright dip, bright nickel plating, bright silver plating, bright tin plating, cadmium plating, chem film, clear chromate, copper plate, copper strike, electroless nickel plating, fuse oil, gold plating, hot D.I. rinsing, liquid water displacement, matte silver plating, nickel plating, nickel strike, nitric dip, olive drab, passivation, permanganate (descale), rinsing (countercurrent, running, & static), silver strike, tin / lead plating, yellow chromate, and zincate. Superior operates a batch pretreatment system, which consists of pH adjustment, cyanide destruct, chemical precipitation, clarification, coagulation, filter press and final effluent filtration. The non-metal wastestreams undergo pH adjustment only.

From January 2019 through February 2019, OC San conducted downstream monitoring of Superior’s discharge during which cadmium, copper, lead, nickel, zinc, and pH violations were detected. In March 2019, OC San issued an Order to Cease Noncompliant Discharges informing Superior of OC San’s intention to initiate administrative proceedings against Superior based on the discharge violations detected during the downstream monitoring. In April 2019, OC San held a Compliance Meeting with Superior during which the company chose to enter into a Settlement Agreement with OC San to settle the violations and avoid administrative proceedings. The Settlement Agreement was issued in May 2019 and included a negotiated \$50,000 administrative penalty.

In July 2019, OC San issued a Probation Order requiring Superior to conduct a proper evaluation of its pretreatment system and to make any necessary improvements to achieve consistent compliance by September 2019. In August 2019, OC San conducted a Compliance Inspection and noted that Superior had made adequate progress in complying with their Probation Order requirements. The company also submitted all required self-monitoring & biweekly reports in a timely manner. However, Superior had a

daily and a monthly cyanide (total) violation in August 2019. In September 2019, OC San conducted another Compliance Inspection to verify compliance with Probation Order and inquire about the cause of the cyanide violation. Superior's efforts to improve compliance included installation of new measurement equipment (ORP & pH measurement, new pumps & piping), training for treatment operators in the use of new bench test kits for metals & improved control equipment, and an updated pretreatment system schematic and an updated Operations & Maintenance manual. On October 2019, OC San conducted a follow-up inspection and resampling and found that Superior's consultant had evaluated the cyanide destruct system and concluded that the control equipment (pH & ORP) was faulty and needed replacement. The pH and ORP controller had already been completed by the time of the inspection. The resampling results showed compliance.

In January 2020, Superior had zinc daily and monthly average discharge limit violations. In February 2020, Superior had cyanide (total) daily and monthly limit violations. As a result, OC San conducted a Compliance Inspection and resampling. The resampling results showed compliance. In April 2020, Superior had further cyanide (total) daily and monthly limit violations. As a result of the continued violations, In May 2020, OC San issued a Compliance Meeting Notification letter to Superior. The Compliance Meeting was held remotely in June 2020 with Superior detailing the measures they have taken through their consultant to improve compliance, which included obtaining test kits to use one each batch prior to discharge, re-evaluating their batch cyanide pretreatment system and performing additional cyanide monitoring. Also discussed was the handling of cyanide samples, for which Superior was not adding an appropriate preservative – the company later corrected this.

July 1 – December 31, 2020

On **July 23, 2020**, OC San issued Notices of Violation for the February and April 2020 cyanide monthly limit exceedances. In the month of **August 2020**, Superior Plating had another cyanide (total) monthly violation, for which a Notice of Violation was issued on **November 19, 2020**. On **October 22, 2020**, Superior Plating was published in the newspaper as Significantly Non-Compliant for FY2019-2020 due to its multiple acute cyanide (total) discharge violations during that fiscal year.

Working with OC San in the investigation of the cause of the non-compliance, Superior found that cyanide self-monitoring samples were not being adequately preserved after collection to remove oxidants, which was providing a misleading cyanide result, and led to the facility batch discharging incompletely-treated non-compliant cyanide waste. Superior altered its cyanide sampling process and had no further violations in the period as a result of the modification.

OC San will continue to monitor Superior's discharge and compliance status during the next reporting period to determine if escalated enforcement is necessary.

Superior Processing (Permit No. 1-021403)

Superior Processing is a metal plating job shop specializing in electroless nickel/immersion gold, electrolytic nickel/gold, electrolytic and immersion silver, and immersion tin plating on customer supplied printed circuit boards. Wastewater is generated from these wet operations and the associated rinses and segregated into two wastestreams. The metal-bearing waste is routed to a continuous ion exchange system and the cyanide-bearing waste is routed to the batch cyanide destruct system.

In July 2019, Superior Processing had nickel daily and monthly average discharge limit violations. In October 2019, OC San conducted a Compliance Inspection and resampling during which OC San learned that the effluent from the cyanide destruct system is discharged directly to the sewer without going through the ion exchange system to remove any nickel that might be present in the cyanide-bearing wastestreams. It is likely that Superior Processing had not experienced nickel violations in the past because previous OC San sampling had been conducted when there was no simultaneous discharge from the cyanide destruct system. Hence, OC San directed Superior Processing to plumb the cyanide treatment effluent to the ion exchange system for metals removal prior to discharge to the

sewer; the resampling results showed compliance. In December 2019, Superior Processing had further nickel violations even though Superior Processing had already replumbed the cyanide treatment system effluent through the ion exchange system.

In January 2020, OC San conducted a follow-up Compliance Inspection during which OC San determined that the first IX vessel was not being monitored for breakthrough. Hence the first vessel is not being replaced in a timely manner to prevent the second IX vessel in series from getting spent and causing discharge of noncompliant effluent. On the same day, Superior Processing submitted a Corrective Action Report detailing that the first vessel would be tested for breakthrough on a regular basis. This would ensure that Superior Processing could replace or rotate the IX vessels in a timely fashion and a back-up IX vessel would always be available. In April 2020, Superior Processing had further nickel daily and monthly limit violations. In May 2020, OC San conducted a follow-up Compliance Inspection during which Superior Processing reported that, in consultation with their IX vendor, the resins used in the IX vessels were not suitable for removing complexed nickel present in the cyanide-destruct effluent. On the same day, Superior Processing discontinued treating cyanide-bearing wastestreams onsite and opted to wastehaul all cyanide-bearing wastewater offsite on a weekly or biweekly basis, not only to maintain compliance but also to recover gold present in the wastestream.

July 1 – December 31, 2020

On **July 2, 2020**, OC San issued a Notice of Violation for the April 2020 nickel monthly limit exceedance. On **July 14, 2020**, OC San conducted a Compliance Inspection to review inconsistencies between drawings submitted in 2019 and drawings submitted in 2020 to OC San. The inspection was also intended to review how waste streams have been transferred and discuss proper waste streams segregation. OC San noted that the rinses from the Electroless Nickel-Immersion Gold process were being sent to the IX System and not completely segregated with other cyanide wastes for wastehauling. Superior Processing reported that these streams have very low cyanide and nickel concentrations. OC San requested a wastewater characterization to verify the concentration of all pollutants of concern. At the time of the inspection, Superior had addressed the majority of the drawing inconsistencies. On **October 22, 2020**, Superior Processing was published in the newspaper as Significantly Non-Compliant for FY2019-2020 due to its two acute nickel discharge violations during that fiscal year. On **December 30, 2020**, OC San revised Superior Processing's permit to increase the frequency of self-monitoring requirements for Nickel from quarterly to monthly, as a result of the nickel violations.

OC San will continue enforcement actions during the next reporting period and monitor Superior Processing's discharge and compliance status.

Thompson Energy Resources, LLC (Permit No. 1-521773)

Thompson Energy Resources, LLC (Thompson Energy) produces crude oil by separating ground water from the oil/groundwater mixture extracted from multiple wells onsite through heating and chemical treatment; separated water is discharged to the sewer system.

In July 2018, Thompson Energy had an oil & grease violation. In September 2018, OC San conducted a Compliance Inspection and resampling during which Thompson Energy attributed the source of the violation to a bad batch of chemicals coupled with high temperature processing. In mid-September 2018, Thompson Energy submitted a corrective action report indicating that the company had replaced its chemical vendor and implemented new chemicals at the facility. The resampling results showed compliance.

In June 2019, Thompson Energy had another oil & grease violation. In August 2019, OC San conducted a Compliance Inspection and resampling, during which Thompson Energy indicated that the source of the violation was failure of chemical pumps on site. During the site inspection, Thompson Energy provided a corrective action report indicating that the dosing pumps and associated piping have been

replaced. The resampling yielded another oil & grease violation. In November 2019, OC San conducted another Compliance Inspection and resampling during which OC San determined that Thompson Energy's ongoing oil & grease violations were being caused by insufficient retention time due to one of the two clarification tanks being out of service, along with other multiple operational issues. The resampling detected another oil & grease violation.

In January 2020, OC San issued a Compliance Requirements Letter directing Thompson Energy to attend a Compliance Meeting, which was held in February 2020. During the meeting, Thompson Energy described several operational issues including solidification of chemicals, failure of chemical dosing pumps, and a broken belt-skimmer that caused the oil & grease violations. OC San discussed the issues regarding the frequent high temperature of the wastewater at the facility, as well as the possibility of installation of a new settling tank to increase retention time and further reduce the effluent temperature. Following the meeting, OC San issued a Compliance Requirements Letter directing Thompson Energy to install a new belt skimmer by March 15, 2020 and increase the frequency of oil & grease self-monitoring, effective May 1, 2020. OC San revised Thompson Energy's permit to reflect this increased self-monitoring frequency for oil & grease. Prior to the belt-skimmer installation deadline, Thompson Energy informed OC San that their waste stream is consistently in compliance with the oil & grease limits after implementing various process changes on site, and thereafter requested cancellation of the belt-skimmer installation requirement. In April 2020, Thompson Energy informed OC San that they will be temporarily shutting down operations due to economic constraints. OC San instructed Thompson Energy to lock-close the gate valve on the effluent piping to prevent any inadvertent discharge to the sewer system.

July 1 – December 31, 2020

Thompson Energy had no further violations during this reporting period. OC San will continue to monitor Thompson Energy's discharge and compliance status on a quarterly basis.

TTM Technologies North America, LLC (Coronado) (Permit No. 1-521859)

TTM Technologies North America, LLC (TTM Technologies) is a large scale, full-service printed circuit board shop. Wastewater is generated from the processing of copper laminates into printed circuit boards. Wet processes include copper plating, electroless copper plating, nickel/gold plating, solder mask, alkaline cleaning, acid cleaning, scrubbing, developing, resist stripping, tin stripping, etching, screen cleaning, oxide coating, and miscellaneous cleanup/mop water. Rinse schemes practiced at the facility include significant use of static rinses in addition to running rinses. TTM Technologies operates a continuous pretreatment system to treat low concentration wastestreams, consisting of pH adjustment and multiple ion exchange resin beds, with a large portion of the effluent reused onsite. Batch treatment is performed on spent solutions and ion exchange backflush and consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press. Concentrated wastestreams (etchant, spent plating solutions) are wastehauled offsite.

In August and September 2018, TTM Technologies had copper violations. In October 2018, OC San issued a Compliance Requirements Letter requiring TTM to implement corrective actions and attend a Compliance Meeting later that month. In the Compliance Meeting, TTM submitted information detailing their efforts to review the pretreatment system and explained the improvements that had been implemented prior to the meeting. OC San required TTM Technologies to submit an updated pretreatment system diagram and operations and maintenance manual (O&M) by December 2018, which was extended to the following quarter due to delays. In January 2019, TTM submitted its O&M Manual which contained the updated pretreatment system schematics. In June 2019, TTM had another copper violation.

In July 2019, OC San conducted a Compliance Inspection to investigate the copper violation. During the inspection, TTM stated that their review of their ion exchange regeneration schedule indicated that

the final 'scavenger' stage required more frequent regeneration, which by that time had already been implemented.

July 1 – December 31, 2020

On **December 3, 2020**, TTM Technologies had copper daily and mass limit violations, for which a Notice of Violation was issued on **December 17, 2020**.

OC San will conduct enforcement during the next reporting period and continue to monitor TTM's discharge and compliance status.

Vi-Cal Metals, Inc. (Permit No. 1-521846)

Vi-Cal Metals, Inc. (Vi-Cal) is a metals recycling facility. Metal parts and shavings are dropped off from trucks and various sized bins. Vi-Cal sorts some of the parts and crushes/shreds larger parts for compaction into shipping containers and delivery to foundries off site. Wastewater is generated from pressing waste oil and coolant from metal parts, which is collected for treatment before discharge to the sewer system.

July 1 – December 31, 2020

During routine inspections on **September 21** and **September 23**, and a Compliance Inspection on **October 8, 2020**, OC San noted potential stormwater and surface runoff discharge to the sample point in addition to the oily waste and various types of solid debris entering the outside drain in the pretreatment area. On **October 20, 2020**, OC San issued an Order to cease Non-Compliant Discharges requiring Vi-Cal to attend a Compliance Meeting. On **November 5, 2020**, OC San held the Compliance Meeting to discuss Vi-Cal's multiple noncompliance issues, including failure to submit self-monitoring reports. On **December 1, 2020**, OC San issued a Compliance Meeting Summary and Requirements Letter requiring Vi-Cal to (1) submit plans to mitigate stormwater and surface runoff discharge to the sewer, (2) remove bypass piping, flexible hosing, and inoperable treatment components from the pretreatment area, (3) submit manifests for previous wastehauling of oily waste and spent coolants, (4) submit plans to treat oily wastes onsite, and (5) use an approved EPA method for non-polar oil & grease analysis.

OC San will continue enforcement during the next reporting period and monitor Vi-Cal's discharge and compliance status.

Yakult USA, Inc. (Permit No. 1-521850)

Yakult USA processes and packages probiotic dairy beverages. The bacteria are cultured and added to the milk in seeding operations. Following the initial inoculation of bacteria, the product is fermented for 6-7 days at various temperatures specific to growth curves for the bacteria. Following fermentation, flavoring and sugar sweeteners are added to the product during mixing operations. Finally, the product is mixed with RO water, packaged, palletized, stored, and shipped.

July 1 – December 31, 2020

On **September 9, 2020**, OC San issued a Compliance Requirements Letter due to Yakult's failure to submit a proposal for the installation of a second effluent flowmeter to measure either the combined flow from all the non-process streams or the total industrial flow from the facility. The proposal was due to OC San on **June 15, 2020** and the effluent flowmeter installation was required to be completed by **July 1, 2020**. In the letter, OC San granted an extension for the proposal to be submitted by **September 30, 2020**, and the flowmeter installation to be completed by **November 15, 2020**.

On **December 15, 2020**, OC San held a Compliance Meeting with Yakult, for which a Compliance Letter was issued on **December 7, 2020**. In the meeting, Yakult reported that the flowmeter was not installed by **November 15, 2020** due to 2020 budget constraints. OC San stated that Yakult's failure to meet the required due date subjects the company to significant administrative penalties and requested the submittal of an interim solution proposal while a long-term solution is implemented.

OC San will evaluate Yakult's compliance with this requirement during the next reporting period.

SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA)

3.0 Santa Ana Watershed Project Authority (SAWPA)

SAWPA was formed in 1968 to develop a long-range plan for managing, preserving, and protecting the quality of water supplies in the Santa Ana Basin. SAWPA is a Joint Powers Authority (JPA) consisting of five member agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western). SAWPA's program in water quality management is integrated with those of other local, state, and federal agencies.

The Inland Empire Brine Line (Brine Line) is a pipeline designed to carry saline wastewater from the Upper Basin to the Orange County Sanitation District (OC San) for disposal, after treatment, into the Pacific Ocean. This wastewater consists of a mixture of desalter brine and saline wastewater from Industrial Users (IUs), but also some temporary domestic discharges. The wastewater is treated by OC San to comply with environmental standards before discharge to the ocean outfall. The capacity of the Brine Line available to SAWPA is 30 million gallons per day (MGD). The average daily discharge was 10.97 MGD for this reporting period.

3.1 Brine Line System Pretreatment Program Overview

SAWPA has a wastewater discharge ordinance applicable to the Brine Line. It is essentially, with some appropriate modifications, substantially similar to OC San's Wastewater Discharge Regulations Ordinance. In addition, a Memorandum of Understanding is in place to delineate pretreatment permitting, monitoring, enforcement, and reporting responsibilities between SAWPA and OC San. SAWPA has entered into a Multijurisdictional Pretreatment Agreement (Agreement) with the City of Beaumont (Beaumont), Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), San Bernardino Valley Municipal Water District (Valley District), Western Municipal Water District (Western), and Yucaipa Valley Water District (YVWD). This Agreement delineates the pretreatment responsibilities between SAWPA and the agencies to carry out and enforce a pretreatment program to control discharges from IUs located in their service areas.

SAWPA owns and operates the Brine Line above the Orange County line and has purchased 17 MGD of treatment and disposal capacity rights at OC San's treatment facilities. As of December 31, 2020, there are thirty-one (31) direct connections. Eighteen (18) indirect discharge Permittees located within the SAWPA service area discharge to the four (4) Brine Line Collection Stations (Collection Stations). The Collection Stations are located in, and operated by, the following agencies: EMWD, IEUA, San Bernardino Municipal Water Department (SBMWD) on behalf of Valley District, and the City of Corona on behalf of Western.

SAWPA has the permitting responsibilities for all Liquid Waste Haulers (LWH) that use the Collection Stations. As of December 31, 2020, there are eight (8) LWH permitted by SAWPA to use the Collection Stations. The SAWPA LWH permits assign a primary collection station and alternate collection station should the primary collection station become unavailable due to repairs or closure.

During the reporting period (July 1, 2020 through December 31, 2020), SAWPA continued implementation of numerous program documents and worked to improve the operation and implementation of the Pretreatment Program. A multijurisdictional pretreatment agreement between SAWPA and the member/contract agencies defines the roles and responsibilities of SAWPA and the Agencies. SAWPA and the member and contract agencies use a procedures

document for uniform and consistent implementation of the Pretreatment Program. Orange County Sanitation District (OC San) has completed the process of updating and revising their Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OC San, SAWPA is required to update their Ordinance to include relevant OC San revisions. SAWPA has developed draft Ordinance No. 9 which has been revised to incorporate the updates within the new OC San Ordinance. SAWPA submitted the draft Ordinance to OC San for their review and concurrence on June 11, 2020. It is anticipated SAWPA will receive comments from OC San regarding the draft Ordinance in early 2021.

Reporting below is individually presented for each SAWPA Pretreatment Program member/contract agency.

3.2 SAWPA Pretreatment Program

3.2.1 The City of Beaumont (Beaumont)

Description of Beaumont

Beaumont is the owner and operator of the City of Beaumont wastewater treatment plant and will be responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area upon its connection to the Brine Line in 2020. Beaumont has been required by the Santa Ana Regional Water Quality Control Board to proactively manage salinity in the two underlying groundwater basins, the Beaumont and San Timoteo Groundwater Management Zones. As a result, Beaumont has installed a Reverse Osmosis (RO) treatment of the tertiary treated wastewater treatment plant effluent. The RO concentrate is discharged to the Brine Line. The Beaumont wastewater treatment plant discharges to Cooper's Creek, tributary to San Timoteo Creek, which is tributary to the Santa Ana River. By discharging the brine concentrate to the Brine Line, discharge of a minimum 685 tons of salt to the Santa Ana River is avoided, benefiting the downstream groundwater basins. Currently there are no permitted users within the Beaumont Service Area.

Although Beaumont currently has no permitted industries discharging to the Brine Line they have participated in Brine Line activities, including training conducted by SAWPA personnel, since early-2020. They conduct the industrial user survey upstream of the City of Beaumont wastewater treatment plant that began discharge to the Brine Line in July of 2020, in accordance with SAWPA policies and procedures.

3.2.2 Eastern Municipal Water District (EMWD)

Description of EMWD

EMWD is a Municipal Water District responsible for the implementation of certain pretreatment activities for the indirect and direct industries that discharge to EMWD's Non-Reclaimable Waste Line, which discharges to the Brine Line at Reach V. In the face of declining groundwater levels and continuing droughts, EMWD was formed in 1950 to secure additional water for a lightly populated area of western Riverside County. EMWD joined the Metropolitan Water District of Southern California a year later to augment its local supplies with recently available imported water. EMWD also provides sewer service throughout its area. The EMWD headquarters are located in Perris, California and serves the eastern portion of the watershed in Riverside County, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

There was no enforcement action during this reporting period.

3.2.3 Inland Empire Utilities Agency (IEUA)

Description of IEUA

IEUA is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries located within IEUA's service area which discharge to the Brine Line at Reach 4A and 4D. IEUA, originally named the Chino Basin Municipal Water District (CBMWD), was formed in 1950 to supply supplemental water to the region. Since its formation, the Agency has expanded its areas of responsibility from a supplemental water supplier to a regional wastewater treatment agency with domestic and industrial disposal systems and energy recovery/production facilities. In addition, the Agency has become a recycled water purveyor, bio-solids/fertilizer treatment provider and continues as a leader in water supply salt management, for the purpose of protecting the region's vital groundwater supplies.

IEUA strives to enhance the quality of life in the Inland Empire by providing optimum water resources management for the area's customers while promoting conservation and environmental protection. IEUA covers 242-square miles, distributes imported water, provides industrial/municipal wastewater collection and treatment services, and other related utility services to more than 850,000 people. The Agency's service area includes the Cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, as well as the Cucamonga Valley Water District and the Monte Vista Water District.

Enforcement Action

- **Green River Golf Club (Permit No. D1032-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Green River Golf Club on August 19, 2020 for failure to maintain its grease interceptor and service line lateral. On August 10, 2020, Permittee notified SAWPA that it was experiencing a Sanitary Sewer Overflow (SSO) on its property. SAWPA personnel responded and found the cause was a blockage in the Green River Golf Club service line lateral. This blockage in the service line lateral was due to Permittee's failure to maintain its grease interceptor. The NOV/OCA required the Permittee to investigate the cause of the violations and submit a written report detailing its findings along with a corrective action plan designed to bring its facility into consistent compliance with wastewater permit No. D-1032-3. The NOV/OCA also requires Permittee to begin annual CCTV inspections of its service line lateral and provide CCTV documentation of these inspections to IEUA. On August 25, 2020, the Permittee responded stating that the violation was caused by build-up of debris in their service line lateral and that blockage was cleared by West End Pumping. Permittee stated additional jetting of line was performed by Option One plumbing following notification to SAWPA of the overflow. Permittee states it will inspect the lateral quarterly and conduct CCTV inspection of the service line lateral annually. No further action is required at this time. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Green River Golf Club to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

3.2.4 Jurupa Community Services District (JCSD)

Description of JCSD

JCSD is a public agency responsible for the implementation of certain pretreatment program activities for the direct industries connected to the Brine Line via JCSD's sewer collection system within its service area (Brine Line Reach IV-D). JCSD headquarters is located at 11201 Harrel Street in the City of Jurupa Valley. JCSD was formed in 1956 and provides water, sewer, park services, graffiti abatement, and street lighting. In 1988 the District formed the Community Facilities District (CFD) No. 1 to provide for water, sewer, flood control and street infrastructure within the industrial portion of the Mira Loma area. The boundaries of CFD[SA1][DJ2] No. 1 expanded from 1,900 acres to 3,000 acres in 1992. In June 1989, JCSD contracted with Western for capacity in Reach IV-D of the Brine Line.

Enforcement Action

There was no enforcement action during this reporting period.

3.2.5 San Bernardino Municipal Water Department (SBMWD)

Description of SBMWD

SBMWD is a Municipal Water Department and is responsible for administering certain pretreatment program activities for indirect industries associated with the SBMWD Brine Line Collection Station. SBMWD provides potable water and sewerage services for the City of San Bernardino, in addition to sewerage service for the cities of Loma Linda and Highland, as well as some isolated county areas. These services are augmented by the operation of a brine waste collection station which provides an alternate disposal site for industries which generate high strength brine waste. The SBMWD, under contract with the San Bernardino Valley Municipal Water District, is responsible for administering the pretreatment program associated with the SBMWD Brine Line Collection Station.

Enforcement Action

- **Rayne Water Conditioning (Permit No. I1066-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rayne Water Conditioning on August 19, 2020 for a pollutant discharge violation. On July 7, 2020 SBMWD collected a wastewater sample from Monitoring Point 002. The laboratory analysis results received on July 22, 2020 indicated a Copper concentration of 4.8 mg/L, which exceeded the Daily Maximum Discharge Limitation of 3.0 mg/L as stated in Permit I1066-3. The NOV/OCA required the Permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation no later than August 28, 2020. The Permittee responded on August 27, 2020 and stated the cause of the violation could not be determined and stated a Copper sample collected on June 9, 2020 resulted in .535 mg/L and a Copper sample collected on July 21, 2020 resulted in .283 mg/L. The Permittee stated to prevent future violations the Copper chelating resin tank shall be exchanged on a quarterly basis. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. Additionally, the Permittee is currently undergoing an extensive review of the copper concentrations

from their customers to attempt to determine the source of the high concentrations coming into the facility. Furthermore, the Permittee is acquiring additional Copper chelating resin tanks so that the tanks can be run in series to ensure consistent compliance with the permit limitations. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Rayne Water Conditioning to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

- **Rayne Water Conditioning (Permit No. I1066-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rayne Water Conditioning on August 27, 2020 for failure to submit a self-monitoring report (SMR) as required by permit. On July 7, 2020, the Permittee failed to submit the required SMR for semi-annual self-monitoring. A written warning had been issued with a requirement for the self-monitoring to be completed and sample results submitted on an SMR by August 20, 2020. The Permittee failed to collect the semi-annual self-monitoring by August 20, 2020 as required by the written warning. The NOV/OCA required the Permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation no later than September 3, 2020. Permittee responded on September 3, 2020 and attributed the cause of the violation to mistakenly scheduling Copper sampling instead of the full semi-annual sampling with the contract laboratory. The Permittee stated semi-annual sampling has now been scheduled with the contract laboratory to be completed every other quarter to prevent future violations. The late SMR was then submitted as required. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Rayne Water Conditioning to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

3.2.6 **San Bernardino Valley Municipal Water District (Valley District)**

Description of Valley District

Valley District is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct industries connected to the Brine Line within its service area (Brine Line Reach IV-E). Valley District headquarters is located in the City of San Bernardino and serves most of the northern and eastern reaches of the watershed in San Bernardino County with a small portion of its service area in Riverside County. Valley District was formed in 1954 to plan long-range water supply for the San Bernardino Valley. It is the only State Water Contractor within SAWPA and imports water into its service area through participation in the California State Water Project while also managing groundwater storage within its boundaries. It was incorporated under the Municipal Water District Act of 1911 (California Water Code Section 7100 et seq., as amended). Its enabling act includes a broad range of powers to provide water, as well as wastewater, stormwater disposal, recreation, and fire protection services.

Enforcement Action

- **Rialto Bioenergy Facility, LLC (Permit No. D1130-1)**

On December 12, 2020, the Permittee's contract laboratory collected a sample. Analysis of the sample indicated a concentration of 42 mg/L for the parameter of Total Suspended Solids, a violation of the daily maximum discharge interim limitation as stated by Permit. On December 31, 2020, the Permittee's contract laboratory collected a sample. Analysis of the sample indicated a pH of 5.7 s.u. a violation of the minimum

discharge limitation of 6.0 s.u. as stated by Permit. Enforcement for these violations is expected to be issued in January of 2021.

3.2.7 Santa Ana Watershed Project Authority (SAWPA)

Description of SAWPA

SAWPA is a Joint Powers Authority, classified as a Special District under State of California law, responsible for the implementation of the pretreatment program for the industries connected to the Brine Line. SAWPA consists of five Member Agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western). SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to Direct and Indirect Dischargers jointly with Member and Contract Agencies and solely issues permits to all Member and Contract Agency owned or affiliated Direct and Indirect Dischargers.

Enforcement Action

There was no enforcement action during this reporting period.

3.2.8 SAWPA Liquid Waste Hauler (LWH) Program

SAWPA solely permits the Waste Haulers allowing for the Waste Haulers to have only one permit to provide service to the four Member Agencies' Collection Stations. This also facilitates utilization of the Generator's regular Waste Hauler if an Alternate Collection Station must be used.

Enforcement Action

- **Hazmat Trans, Inc. (Permit No. H1033-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Hazmat Trans, Inc. (Haz Mat) on November 12, 2020 for failure to follow the Liquid Waste Hauler Cleaning and Maintenance Plan (LWHCMP) as required by permit. On October 20, 2020, Haz Mat attempted to discharge brine wastewater, which originated from Angelica Textile Services to the SBMWD Collection Station. Prior to discharge, SBMWD personnel collected a grab sample from the Haz Mat tanker. The pH of the brine wastewater collected was measured to be 2.72 S.U. and the load was subsequently prohibited from discharging to the SBMWD Collection Station. The NOV/OCA required the permittee to respond in writing by November 30, 2020 with a report detailing how the violations shall be prevented in the future. On November 30, 2020, the response to the NOV/OCA was received detailing how the violation was attributed to the driver not following the LWHCMP. The required retraining and supporting documentation submitted indicates the corrective action has been completed as required and accordingly. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

3.2.9

Western Municipal Water District (Western)

Description of Western

Western is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries connected to the Brine Line within its service area. Western was formed in 1954 under the Municipal Water District Act of 1911 for the purpose of bringing supplemental water from the Metropolitan Water District of Southern California to a growing western Riverside County. Western's service area covers 527 square miles, serving a population of approximately 900,000 people. The District serves 10 wholesale customers with imported water via the Colorado River and the State Water Project. Western also supplies imported water and groundwater directly to approximately 25,000 residential, commercial and agricultural customers in the areas of El Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Orangecrest, Mission Grove, Lake Mathews, March Air Reserve Base, Rainbow Canyon and portions of the cities of Riverside and Murrieta. The Murrieta division provides water and wastewater services in a 6.5-square mile portion of Murrieta and relies on both groundwater and imported sources. Western headquarters is located in Riverside, California and serves the western Riverside County portion of the watershed, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

- **Aramark Uniform & Career Apparel, LLC (Permit No. D1004-1.1)**^[SA3]_[DJ4]

A Cease and Desist Order and Compliance Order (Order) was issued to Aramark Uniform & Career Apparel, LLC (Aramark) on May 12, 2020 for a pollutant discharge violation and a hazardous waste discharge to the Brine Line. On March 30, 2020, Aramark Operators staff discovered an accidental discharge of sulfuric acid caused by operator error. The wastewater discharged into the Brine line had a pH of less than 6.0 Standard Units (S.U.) a violation of the minimum daily discharge limitation for the parameter of pH of 6.0 S.U., and at times less than 2.0 S.U., which is subject to the hazardous waste reporting criteria required by 40 CFR 403.12(p) and Section X.B of the Permit. The approximate flow discharged reported was 21,000 gallons and the discharge of wastewater with a pH of less than 2.0 S.U. occurred for approximately 20 minutes. Aramark made immediate notification to WMWD, SAWPA, OC San, and RWQCB. Aramark was required to immediately cease and desist the discharge of noncompliant wastewater from Aramark to the Brine Line, conduct and document Slug Load Control Plan (SLCP) training for all appropriate Aramark personnel, complete installation of a digital final effluent pH meter recorder for download of complete pH monitoring data, and complete installation of a new brine regeneration softener system to eliminate the necessity for the sulfuric acid currently employed in this process, which resulted in the low pH discharges to the Brine Line as a corrective action for the non-compliant discharges within sixty days of receipt of the Order. Aramark responded on May 20, 2020 documenting completion of the installation of the new Brine regeneration system and completion of the SLCP training. Additionally, Aramark provided a plan for the installation of a digital final effluent pH recorder for download of complete pH monitoring data. The installation is to be completed within thirty (30) days of SAWPA's approval, which was granted on June 8, 2020. Aramark completed installation of the pH recorder on July 8, 2020. Review of the required submittals from Aramark and inspection of the completed projects indicated the corrective actions were completed on July 30, 2020. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed on August 13, 2020. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with

permit requirements and SAWPA Ordinance No. 8.

- **Frutarom USA, Inc. (Permit No. D1029-3)**

A[DJ5] Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Frutarom USA, Inc. (Frutarom) on June 10, 2020 for a pollutant discharge violation. On May 20, 2020, the Permittee collected a wastewater sample from Monitoring Point 001. The laboratory results submitted on June 5, 2020 indicated a Dissolved Sulfides concentration of 1.0 mg/L, which exceeded the Daily Maximum Discharge Limitation of 0.5 mg/L as stated in the Wastewater Discharge Permit. The NOV/OCA required a written response by June 23, 2020 and resampling to be conducted once per week for three consecutive weeks. The first resample result was due by July 9, 2020. The written response was received on June 23, 2020 and the first resample was received on June 29, 2020 and indicated compliance. The two additional resamples were received as required and also indicated compliance. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed on August 4, 2020. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

- **Prudential Overall Supply (Permit No. I1062-4)**

Prudential Overall Supply attempted to discharge an unpermitted wastestream to the Brine Line Collection Station which was subsequently rejected at the Collection Station. Enforcement for this violation is expected to be issued in January of 2021.

3.2.10 Yucaipa Valley Water District (YVWD)

Description of YVWD

YVWD is a Water District responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area. YVWD was formed on September 14, 1971, when the Secretary of State of the State of California certified and declared formation of the District. The District operates under the County Water District Law, being Division 12 of the State of California Water Code. Although the immediate function of the District at the time was to provide water service, the YVWD currently provides a variety of services to residential, commercial and industrial customers. The YVWD provides sewer collection and sewer treatment services. Sewer treatment takes place at the highly advanced Wochholz Regional Water Recycling Facility that provides advanced treatment, including the capability to demineralize the recycled water. In 2012, the YVWD completed an extension of the Inland Empire Brine Line operated by the Santa Ana Watershed Project Authority. The brine disposal facility is critical to ensure the YVWD meets the stringent water quality objectives set by the Regional Water Quality Control Board for the Yucaipa Management Zone, Beaumont Management Zone and the San Timoteo Management Zone.

Although YVWD currently has no permitted industries discharging to the Brine Line they have participated in Brine Line activities, including training conducted by SAWPA personnel, since 2013. They conduct the industrial user survey upstream of the Henry Wochholz Regional Water Recycling Facility that began discharge to the Brine Line in July of 2016, in accordance with SAWPA policies and procedures. The Henry Wochholz Regional Water Recycling Facility service area includes three industrial permittees.

Enforcement Action

There was no enforcement action during this reporting period.

3.3 Permittees in Significant Noncompliance (SNC)

At the end of each quarter, EPA requires the evaluation of each IU's compliance status using a six-month period. Each IU is evaluated for SNC four times during the year, and the total evaluation period covers 15 months (beginning with the last quarter of the previous pretreatment year through the end of the current year).

As of December 31, 2020, of the active fifty-seven (57) Permittees, there were no permittees classified as SNC. An industry was determined to be in SNC if it incurred a violation that met one or more of the criteria listed below as provided in 40 CFR, Part 403.

- Chronic violations of wastewater discharge limits are defined as those in which 66% or more of all measurements for the same pollutant taken during a consecutive six-month period exceed (by any magnitude) a numeric pretreatment standard or requirement including instantaneous limits as defined by 40 CFR 403.3(l).
- Technical review criteria (TRC) violation are defined as those in which 33% or more of all measurements taken for the same pollutant during a consecutive six-month period equal or exceeds the product of the numeric pretreatment standard or requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a pretreatment standard or requirement (daily maximum or long term average, instantaneous limit or narrative standard) that has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW or SAWPA personnel or the general public).
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or the environment; or has resulted in POTW's or SAWPA's exercise of emergency authority to halt or prevent such a discharger.
- Failure to meet within 90 days after the scheduled date, a compliance schedule milestone contained in a local control mechanism or enforcement order, for starting construction, completing construction, or for attaining final compliance.
- Failure to provide, within 45 days of the due date, any required reports such a baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports with compliance schedules.
- Failure to pay, within 30 days, all applicable user application, permit and enforcement penalty fees.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW or SAWPA believes will adversely affect the operation or implementation of the SAWPA's pretreatment program, or the Brine Line or tributaries thereto.

A summary of Permittees in SNC is presented in TABLE 3.1.

TABLE 3.1 Summary of SAWPA and Member/Contract Agency Permittees in Significant Noncompliance (SNC), July 1 – December 31, 2020		
<i>EMWD, IEUA, JCSD, SBMWD, Valley District, SAWPA, & Western Permittees</i>		
Company Name	Permit No.	Reporting or Discharge Violation
None		

3.4 Future Projects that will Affect Quantity of Discharge to the Brine Line System

California Institution for Women (CIW) which is primarily domestic (reclaimable) wastewater will be diverted to the Pine Avenue Sewer, away from the Brine Line. Diversion of the CIW wastewater to the Pine Avenue Sewer away from the Brine Line is anticipated for Fiscal Year 2021/2022.

In-N-Out Warehouse/Food Processing Facility is planned to complete construction and begin discharge of brine wastewater to the Brine Line in late 2021 within the IEUA service area.

Perris II Desalter is a third Desalter in the EMWD service area that is currently under construction. The facility is planned to be commissioned and commence discharge to the Brine Line in July 2021.

3.5 SAWPA Special Projects

SAWPA conducted the following Special Project efforts during the reporting period:

1. Right of way (ROW) maintenance including road grading and vegetation removal for Reach 4A Lower and Reach 4B Lower.
2. Pipeline cleaning, pipeline inspection, and scale assessment for Reach 4A Lower and Reach 4B Lower.
3. Repaired corrosion on Maintenance Access Structure (MAS) along Reach 4A Upper.
4. Siphon cleaning on Reach 4A Upper (Pine Avenue Siphon).
5. Siphon cleaning on Reach 4D (Bellegrave Siphon, siphons along Galena Street)

Activity	Reach 4A Lower	Reach 4B Lower	Reach 4A Upper	Reach 4D
ROW Maintenance	1.5 miles	3 miles	-	-
Line Inspection	-	1,400 ft	-	35,000 ft
Line Cleaning	-	1,400 ft	-	-
MAS Inspected	19	17	57	57
Siphon Cleaned	-	-	1	3

3.6 Brine Wastewater Effluent Characteristics at OC San's SARI Metering Station (SMS)

A flow meter installed at the Orange County line measures SAWPA's discharge (SMS). For the total billing days during the six-month period from July 1, 2020 through December 31, 2020, a total of 2,007.86 MG was discharged into the Brine Line. The SAWPA effluent represents a mixture of domestic and industrial wastewater, industrial brine, and brine from brackish groundwater treated by the desalters. The SMS is sampled by SAWPA weekly for BOD, TSS, and hardness.

TABLE 3.2 and TABLE 3.3 show the mass of pollutants as they were measured at SMS. The data is based on average daily flow. The quarterly average numbers for mg/L and lbs/day are flow-weighted values.

TABLE 3.2 SAWPA Daily Average Concentration (mg/L) And Mass (lbs/day) Measured From Weekly Sampling At OC San's SARI Metering Station, July – September 2020

SAWPA/Orange County Sanitation District

	<u>July 20</u>		<u>August 20</u>		<u>September 20</u>		<u>Quarterly Average</u>	
Average Daily Flow in MGD	11.9273		11.2630		11.3510		11.5138	
<u>Pollutant</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>
Arsenic	ND	****	ND	****	ND	****	ND	****
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	0.0110	1.0942	0.0120	0.1272	ND	****	0.0092	0.8834
Copper	0.0305	3.0339	0.0255	2.3953	0.0370	3.5027	0.0310	2.9768
Lead	ND	****	ND	****	0.0110	1.0413	0.0037	0.3521
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	0.0200	1.9895	ND	****	ND	****	0.0067	0.6402
Silver	0.0105	1.4921	0.0145	1.3620	0.0140	1.3253	0.0145	1.3924
Zinc	0.0355	3.5313	0.0385	3.6164	0.0420	3.9760	0.0387	3.7130
Total Metals	0.1120	11.1410	0.0905	8.5010	0.1040	9.8454	0.1037	9.9578
BOD	22.6154	2,249.6301	25.2308	2,370.0158	44.1875	4,183.1192	31.6429	3,038.4998
TSS	61.6923	6,136.7461	89.8462	8,439.5686	130.0000	12,306.7723	96.4286	9,259.5366

ND = Not Detected

**** = Lbs/Day not calculated due to concentration less than detection limits (typical).

TABLE 3.3 SAWPA Daily Average Concentration (mg/L) And Mass (lbs/day) Measured From Weekly Sampling At OC San's SARI Metering Station, October – December 2020

SAWPA/Orange County Sanitation District

	<u>October 20</u>		<u>November 20</u>		<u>December 20</u>		<u>Quarterly Average</u>	
Average Daily Flow in MGD	10.8497		10.6667		9.8888		10.4684	
<u>Pollutant</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>	<u>mg/L</u>	<u>lbs/day</u>
Arsenic	0.0105	0.9501	ND	****	ND	****	0.0035	0.3056
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	0.0115	1.0406	0.0700	6.2272	0.0385	3.1752	0.0400	3.4922
Copper	0.0460	4.1624	0.0600	5.3376	0.0365	3.0102	0.0475	4.1470
Lead	ND	****	ND	****	ND	****	ND	****
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	0.0390	3.5290	ND	****	ND	****	0.0130	1.1350
Silver	0.0135	1.2216	0.0125	1.1120	0.0120	0.9897	0.0127	1.1059
Zinc	0.0545	4.9315	0.1160	10.3194	0.0530	4.3710	0.0745	6.5043
Total Metals	0.0491	15.8351	0.2585	22.9962	0.1400	11.5461	0.1912	16.6900
BOD	38.8000	3,510.8634	68.6286	6,105.1984	51.0000	4,206.0844	54.6706	4,773.0781
TSS	98.7000	8,930.9849	131.2143	11,672.8242	104.9000	8,651.3382	113.9118	9,945.1965

ND = Not Detected

**** = Lbs/Day not calculated due to concentration less than detection limits (typical).

ORANGE COUNTY SANITATION DISTRICT

**RESOURCE PROTECTION DIVISION
MONITORING AND COMPLIANCE
STATUS REPORT**

APPENDIX 1

**1st and 2nd Quarters
FISCAL YEAR 2020/2021**

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
3M ESPE Dental Products	Z-371301	2111 Mcgaw Ave, Irvine, CA 92614	339114	433.17(a), 467.16, 471.65(n), 471.65(q)	1	0	0		
9W Halo Western opCo, L.P.	1-600378	1575 N.Case St, Orange, CA 92867	812332	403.5(d)	2	10	2		
A & G Electropolish	1-531422	18330 Ward St, Fountain Valley, CA 92708	332813	433.17(a)	2	9	4		
A & K Deburring and Tumbling, Inc.	1-511362	2008 S.Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	2	11	2		
A & R Powder Coating, Inc.	1-021088	1198 N.Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	2	9	4		
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	2	9	5		
Accurate Circuit Engineering	1-011138	3019 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	18	4		
Active Plating, Inc.	1-011115	1411 E.Pomona St, Santa Ana, CA 92705	332813	433.17(a)	2	15	31		
ADS Gold, Inc.	Z-321851	3843 E.Eagle Dr, Anaheim, CA 92807	331410	433.17(a)	0	0	0		
Advance Tech Plating, Inc.	1-021389	1061 N.Grove St, Anaheim, CA 92806	332813	433.17(a)	2	15	28		
Advanced Plating Technology	Z-371321	1765 N.Batavia St, Orange, CA 92865	332813	433.17(a)	1	0	0		
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave, Garden Grove, CA 92841	332722	403.5(d)	3	7	3		
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St, Garden Grove, CA 92841	332722	433.15(a), 471.64(a), 471.65(a)	2	22	35		
Alex C. Fergusson	1-031186	8371 Monroe Ave, Stanton, CA 90680	325611	417.166, 417.176, 417.36	1	6	0		Class 1 Permit Deactivated
Alex C. Fergusson, LLC, A Zep Company	1-601167	8371 Monroe Ave, Stanton, CA 90680	325611	417.166, 417.176, 417.36	1	8	0		New Class 1 Permit Issued
Alexander Oil Company	1-581185	19065 Stewart St, Huntington Beach, CA 92648	211111	403.5(d)	3	0	1		
All Metals Processing of O.C., Inc.	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	2	15	10		
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	2	27	5		
Allied Electronics Services, Inc.	1-011073	1342 E.Borchard Unk, Santa Ana, CA 92705	334412	433.17(a)	2	11	4		
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325612	417.166, 417.176, 417.66, 417.86	3	13	2		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Alloy Die Casting Co.	1-531437	6550 Caballero Blvd, Buena Park, CA 90620	331523	464.15(a), 464.15(b), 464.15(c), 464.15(h), 464.45(a), 464.45(b), 464.45(d)	3	14	4	Zinc	
Alloy Tech Electropolishing, Inc.	1-011036	2220 S.Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	2	11	4		
AlSCO, Inc.	1-021656	1755 S.Anahaim Blvd, Anaheim, CA 92802	812331	403.5(d)	2	17	8		
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E.Alton Ave, Santa Ana, CA 92707	332112	467.46	2	13	11		
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W.Central Ave, Santa Ana, CA 92704	332112	467.45	3	12	5		
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S.Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	3	12	8		
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W.Warner Ave, Santa Ana, CA 92704	332112	467.46	5	12	8	O&G min.	
American Circuit Technology, Inc.	1-021249	5330 E.Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	3	16	4		
Amerimax Building Products, Inc.	1-021102	1411 N.Daly St, Anaheim, CA 92806	332812	465.35	2	11	4		
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	4	13	0		
Ametek Aerospace, Inc.	Z-361006	17032 Armstrong Ave, Irvine, CA 92614	334511	433.17(a)	0	0	0		Zero Discharge Certification Deactivated
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N.Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	3	12	4		
Anchen Pharmaceuticals, Inc. (Fairbanks)	1-541180	72 Fairbanks Unk, Irvine, CA 92618	325412	439.47	2	23	15		
Anchen Pharmaceuticals, Inc. (Goodyear)	1-600359	5 Goodyear Unk, Irvine, CA 92618	325412	439.47	3	24	15	pH	
Anchen Pharmaceuticals, Inc. (Jeronimo)	1-541179	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	2	23	15		
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	2	9	10		
AnoChem Coatings	1-600295	1102 East Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	2	15	6		
Anodyne, Inc.	1-511389	2230 S.Susan St, Santa Ana, CA 92704	332813	433.17(a)	2	13	15		
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 W.Rowland St, Santa Ana, CA 92707	332813	433.17(a)	2	13	10		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
APCT Anaheim	1-600689	250 E.Emerson Ave, Orange, CA 92865	334112	433.17(a)	3	19	10		
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	4	23	31	Copper	
ARO Service	1-021192	1186 N.Grove St, Anaheim, CA 92806	336411	433.17(a)	2	11	4		
Arrowhead Operating Inc.	1-601062	219 First St, Huntington Beach, CA 92648	211111	403.5(d)	2	13	2		
Arrowhead Products Corporation	1-031137	4411 Katella Ave, Los Alamitos, CA 90720	336413	420.76, 420.96(c)(5), 471.35(a), 471.35(bb), 471.35(dd), 471.35(ff), 471.35(j), 471.35(l), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(a), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(s), 471.65(w), 471.65(x)	2	13	9		
Aseptic Technology LLC	1-600716	4940 E.Landon Dr, Anaheim, CA 92807	31193	403.5(d)	5	0	2		
Astech Engineered Products, Inc. (Bldg. 1 & 2)	1-571295	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	2	15	4		Formerly listed as Astech Engineered Products, Inc.
Astech Engineered Products, Inc. (Bldg. 2 Outside)	Z-371320	3030 Red Hill Ave, Santa Ana, CA 92705	336412	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	1	0	0		Formerly listed as Astech Engineered Products, Inc. # 2
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	3	12	3		
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336413	433.17(a)	3	12	1		
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325414	439.17, 439.27	2	16	6	acetone	

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
B&B Enameling, Inc.	Z-331432	17591 Sampson Ln, Huntington Beach, CA 92647	332812	433.17(a)	0	0	0		
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.26, 463.36	2	13	5		
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	2	11	5		
B. Braun Medical, Inc. (West/Lake)	1-541183	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.16, 463.26, 463.36	2	10	5		
B/E Aerospace	Z-600654	3355 La Palma Ave, Anaheim, CA 92806	336413	433.17(a)	0	0	0		
Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	2	11	8		
Bazz Houston Co.	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	3	15	6		
Beckman Coulter, Inc.	1-521824	200 S.Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	2	9	4		
Beo-Mag Plating	1-511370	3313 W.Harvard St, Santa Ana, CA 92704	332813	433.17(a)	2	11	14		
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S.Placentia Ave, Placentia, CA 92870	311812	403.5(d)	2	11	2		
Black Oxide Industries, Inc.	1-021213	1735 N.Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	2	13	4		
Blue Lake Energy	1-521785	5837 Casson Dr, Yorba Linda, CA 92886	211111	403.5(d)	2	9	2		
Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	4	13	2		
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	2	15	4		
Brasstech, Inc	1-600316	1301 E.Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	2	9	4		
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221112	403.5(d)	2	12	1		
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	403.5(d)	2	15	3		
Bridgemark Corporation	1-521844	2930 E.Frontera St, A Unit, Anaheim, CA 92806	211111	403.5(d)	2	8	2		
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	403.5(d)	2	14	2		
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	2	14	2		
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	2	14	5	O&G min.	
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	2	14	2		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Bristol Industries	1-021226	630 E.Lambert Rd, Brea, CA 92821	332722	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v)	3	22	62		
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	403.5(d)	2	10	2		
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	403.5(d)	2	10	2		
Burlington Engineering, Inc.	1-521770	220 W.Grove Ave, Orange, CA 92865	332811	433.17(a)	2	3	2		
Cadillac Plating, Inc.	1-021062	1147 W.Struck Ave, Orange, CA 92867	332813	433.17(a)	3	21	34		
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	2	15	14		
California Faucets	Z-331431	5271 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	0	0	0		
California Gasket and Rubber Corporation	1-521832	533 W.Collins Ave, Orange, CA 92867	339991	428.66(a)	2	0	2		
Cargill, Inc.	1-031060	600 N.Gilbert St, Fullerton, CA 92833	311225	403.5(d)	2	12	12		
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	2	11	6	O&G min.	
CD Video, Inc.	1-511076	12650 Westminster Ave, Garden Grove, CA 92706	334613	433.17(a)	2	11	4		
Central Powder Coating	1-021189	593 Explorer St, Brea, CA 92821	332812	433.17(a)	2	13	4		
Ceradyne, Inc., a 3M Company	1-600691	17466 Daimler St, Irvine, CA 92614	339114	403.5(d)	2	9	2		
Chromadora, Inc.	1-511414	2515 S.Birch St, Santa Ana, CA 92707	332813	433.17(a)	2	11	10		
Circuit Technology, Inc.	1-521821	1911 N.Main St, Orange, CA 92865	334112	433.17(a)	2	13	4		
City of Anaheim - Public Utilities Dept	1-021073	6751 E.Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	2	7	27		
City Of Anaheim - Public Utilities Dept.	1-521862	1144 N.Kraemer Blvd, Anaheim, CA 92806	221112	403.5(d)	2	0	0		
City of Anaheim Public Utilities (Water Services WRDF)	1-521843	210 S.Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	2	6	0		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
City of Anaheim, Canyon Power Plant	1-600296	3071 E.Miraloma Ave, Anaheim, CA 92806	221112	403.5(d)	2	11	1		
City of Huntington Beach Fire Department	1-111015	19081 Huntington St, Huntington Beach, CA 92648	211111	403.5(d)	2	9	2		
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	403.5(d)	2	11	12		
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	4	9	4		
City of Tustin Water Service (17Th St.)	1-071013	18602 E.17th St, Tustin, CA 92705	221310	403.5(d)	2	10	1		
City of Tustin, Water Service (Main St)	1-071268	235 E.Main St, Tustin, CA 92780	221310	403.5(d)	1	0	0		
CJ Foods Manufacturing Corp.	1-521849	500 State College Blvd, Fullerton, CA 92831	311824	403.5(d)	3	13	6		
CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave, Costa Mesa, CA 92627	332911	433.17(a)	1	0	0		
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St, Huntington Beach, CA 92649	334412	433.17(a)	3	15	7	Copper	
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave, Garden Grove, CA 92841	332812	433.17(a)	4	11	0		
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	2	15	8		
Coca-Cola Company -Anaheim Water Plant	1-021392	2121 E.Winston Rd, Anaheim, CA 92806	312112	403.5(d)	2	7	1		
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, Yorba Linda, CA 92886	211111	403.5(d)	3	9	4	O&G min.	
Continuous Coating Corporation	1-021290	520 W.Grove Ave, Orange, CA 92865	332812	433.17(a), 465.15	2	14	10	Zinc	
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	403.5(d)	3	18	2	O&G min.	
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	4	11	6	pH	
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	2	9	8		
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	2	9	4		
CPPG, Inc.	Z-321813	3911 E.Miraloma Ave, Anaheim, CA 92806	332813	433.17(a)	0	0	0		
Crest Coating, Inc.	1-021289	1361 S.Allec St, Anaheim, CA 92805	332812	433.17(a)	2	13	4		
CRH California Water, Inc.	1-011051	502 S.Lyon St, Santa Ana, CA 92701	561990	403.5(d)	1	5	2		
Custom Enamelers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	2	12	8		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Cytec Engineered Materials, Inc.	Z-600005	1440 N.Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	1	0	0		
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W.Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	3	8	2		
Dae Shin USA, Inc.	1-031102	610 N.Gilbert St, Fullerton, CA 92833	313310	403.5(d)	2	10	0		
DAH Oil, LLC	1-581173	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	2	11	2		
Darling International, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	2	13	6		
Data Aire, Inc. #2	1-021379	230 W.Blueridge Ave, Orange, CA 92865	332322	433.17(a)	3	13	4		
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	2	14	4	Copper	
Data Solder, Inc.	1-521761	2915 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	2	11	4		
Dayton Flavors, LLC	1-600038	580 S.Melrose Unk, Placentia, CA 92870	311930	403.5(d)	2	6	2		
DCOR, LLC	1-111013	4541 Heil Ave, Huntington Beach, CA 92649	211111	403.5(d)	2	15	4		
Derm Cosmetic Labs, Inc.	Z-600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	0	0	0		
Diamond Environmental Services, LP	1-600244	1801 Via Burton None, B Unit, Fullerton, CA 92832	532490	403.5(d)	4	12	1	pH	
DNR Industries, Inc.	Z-601019	1562 S.Anahem Blvd, Anaheim, CA 92805	811111	433.17(a)	0	0	0		
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave, Fullerton, CA 92833	311930	403.5(d)	4	13	2	pH	
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	2	8	5		
DS Services of America	1-021393	1522 N.Newhope St, Santa Ana, CA 92703	312112	403.5(d)	2	9	2		
Ducommun Aerostructures, Inc.	1-021105	1885 N.Batavia St, Orange, CA 92865	336413	433.17(a)	3	18	14		
Dunham Metal Plating Inc.	1-601023	1764 N.Case St, Orange, CA 92865	332813	433.17(a)	2	15	9		
Dunham Metal Processing	1-021325	936 N.Parker St, Orange, CA 92867	332813	433.17(a)	2	13	4		
E&B Natural Resources- Angus Petroleum Corporation	1-600254	1901 California St, Huntington Beach, CA 92648	211111	403.5(d)	3	10	4		
Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	3	12	3		
EFT Fast Quality Service, Inc.	1-011064	2328 S.Susan St, Santa Ana, CA 92704	334112	433.17(a)	2	9	4		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Electro Metal Finishing Corporation	1-021158	1194 N.Grove St, Anaheim, CA 92806	332812	433.17(a)	2	8	4		
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W.Harvard St, Santa Ana, CA 92704	332813	433.17(a)	2	18	15	Cadmium	Formerly listed as Reid Metal Finishing
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	4	13	30		
Electron Plating Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	2	15	10		
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	2	13	10	Nickel	
Electrorack Products Co., Inc.	Z-321092	1443 S.Sunkist St, Anaheim, CA 92806	332999	433.17(a)	0	0	0		Zero Discharge Certification Deactivated
Embee Processing (Anodize)	1-600456	2148 S.Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 433.17(a)	2	13	8		
Embee Processing (Plate)	1-600457	2144 S.Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 413.74(c), 433.17(a)	2	13	8		
Excello Circuits Manufacturing Corp.	1-521855	1924 Nancita Cir, Placentia, CA 92870	334412	433.17(a)	3	13	30		
Expo Dyeing and Finishing, Inc.	1-031322	1365 Knollwood Cir, Anaheim, CA 92801	313310	403.5(d)	2	12	0		
Fabrica International, Inc.	1-011278	3201 S.Susan St, Santa Ana, CA 92704	314110	403.5(d)	3	11	0		
Fabrication Concepts Corporation	1-011068	1800 E.St. Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	3	16	9		
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	2	15	4		
FMH Aerospace Corp.	1-600585	17072 Daimler St, Irvine, CA 92614	332912	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	3	15	36		
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	2	30	6		
Fullerton Custom Works, Inc.	Z-331424	1165 E.Elm Ave, Fullerton, CA 92831	332813	433.17(a)	0	0	0		
Gaffoglio Family Metalcrafters	1-600443	11161 Slater Ave, Fountain Valley, CA 92708	336111	426.66	2	10	1		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Gallade Chemical, Inc.	1-011257	1230 E.Saint Gertrude Pl, Santa Ana, CA 92707	422690	403.5(d)	2	10	2		
Gemini Industries, Inc.	1-071172	2311 S.Pullman St, Santa Ana, CA 92705	331492	415.26, 421.266(b), 421.266(e), 421.266(i), 421.266(j), 421.266(m), 421.266(n)	2	18	9		
Gemtech Coatings	Z-600544	2737 S.Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	0	0	0		
General Container Corporation	1-031042	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	2	8	1		Class 1 Permit Deactivated
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	2	10	2		
Golden State Pumping LLC	1-600975	1051 N.Patt St, Anaheim, CA 92801	562219	403.5(d)	16	28	0	pH	Class 1 Permit Deactivated
Gomtech Electronics, Inc.	1-021352	990 N.Enterprise St, M Unit, Orange, CA 92867	334412	433.17(a)	3	14	4		
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	403.5(d)	2	19	8		
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	2	10	2		
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336370	433.17(a)	2	13	10		
Harry's Dye & Wash, Inc.	1-521746	1015 E.Orangethorpe Ave, Anaheim, CA 92801	313310	403.5(d)	2	10	6		
Hartwell Corporation	1-021381	900 Richfield Rd, Placentia, CA 92870	332999	403.5(d)	2	11	4		
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	403.5(d)	2	10	3		
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	3	11	16		
Hightower Plating & Manufacturing Co.	1-021185	2090 N.Glassell Unk, Orange, CA 92865	332813	433.17(a)	2	17	10		
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	3	17	30		
House Foods America Corporation (East)	1-600906	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	2	10	0		
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave, Garden Grove, CA 92841	311224	403.5(d)	2	10	0		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Howmet Global Fastening Systems Inc.	1-021081	800 S.State College Blvd, Fullerton, CA 92831	332722	433.15(a), 433.17(a), 467.46, 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(w), 471.65(x)	3	28	16		
Hyatt Die Casting & Engineering Corp.	Z-331236	4656 Lincoln Ave, Cypress, CA 90630	331523	464.16(a), 464.16(c)	1	0	0		
Ideal Anodizing, Inc.	1-021041	1250 & 1270 N.Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	2	13	4		
Ikon Powder Coating, Inc.	1-521756	1375 N.Miller St, Anaheim, CA 92806	332812	433.17(a)	2	9	4		
Image Technology, Inc.	1-521755	1380 N.Knollwood Cir, Anaheim, CA 92801	325611	417.86	2	5	2		
Imperial Plating	1-031106	2007 Raymer Ave, N Ste, Fullerton, CA 92833	332813	433.17(a)	3	9	15		
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	403.5(d)	4	12	2		
Independent Forge Company	Z-601008	692 N.Batavia St, Orange, CA 92868	332112	467.45	2	0	0		
Industrial Coating, INC	Z-601061	2990 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0		
Industrial Metal Finishing, Inc.	1-521828	1941 Petra Ln, Placentia, CA 92870	332813	403.5(d)	2	8	4		
Intec Products, Inc.	1-021399	1145 N.Grove St, Anaheim, CA 92806	314999	403.5(d)	2	12	2		
Integral Aerospace, LLC	1-600243	2036 E.Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	2	11	9		
International Paper Company (Anaheim)	1-521820	601 E.Ball Rd, Anaheim, CA 92805	322211	403.5(d)	3	14	4		
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	2	12	1		
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	3	4	2		
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	1	6	2		
Irvine Ranch Water District - DATS	1-011075	1704 W.Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	2	10	2		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear None, Irvine, CA 92618	339112	403.5(d)	1	6	1		New Class 1 Permit Issued
J & R Metal Finishing Co.	1-521823	307 N.Euclid Way, H1 Bldg, Anaheim, CA 92801	332812	403.5(d)	2	13	3		
J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Unit, Newport Beach, CA 92663	336611	403.5(d)	2	0	3		
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	3	15	10		
Jellco Container, Inc.	1-021402	1151 N.Tustin Ave, Anaheim, CA 92807	322212	403.5(d)	2	10	3		
John A. Thomas- Bolsa Oil	1-031065	18701 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	2	16	4		
Joint Forces Training Base, Los Alamitos	1-031270	Orangewood Gate, Northwest Corner of the Base Unk, Los Alamitos, CA 90720	928110	403.5(d)	2	11	1		
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	2	9	4		
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N.Anahaim Blvd, Anaheim, CA 92801	423930	403.5(d)	2	10	4		
Kirkhill, Inc. (North)	1-600608	300 E.Cypress St, Brea, CA 92821	339991	428.76(a)	2	13	4		
Kirkhill, Inc. (South)	1-600609	300 E.Cypress St, Brea, CA 92821	339991	428.76(a)	2	13	4		
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	3	12	2		
Kryler Corporation	1-021428	1217 E.Ash Ave, Fullerton, CA 92831	332813	413.14(b), 413.14(f), 433.17(a), 433.17(b)	3	17	4		
Kyocera Precision Tools, Inc.	1-511385	3565 Cadillac Ave, Costa Mesa, CA 92626	333515	403.5(d)	2	9	2		
La Habra Bakery	1-031029	850 S.Cypress St, La Habra, CA 90631	311812	403.5(d)	3	11	6		
La Habra Plating Company	Z-331399	900 S.Cypress Unk, La Habra, CA 90631	332813	433.17(a)	0	0	0		
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	334412	433.17(a)	2	11	8		
Linco Industries, Inc.	1-021253	528 S.Central Park Ave, West Dir, Anaheim, CA 92802	332812	403.5(d)	2	15	4		
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	2	12	10	CN	
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	2	6	1		
M.S. Bellows	1-111007	5322 Mcfadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	2	11	4		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Magma Finishing Corp.	Z-321810	2294 N.Batavia St, D Ste, Orange, CA 92865	332813	433.17(a)	1	0	0		
Magnetic Metals Corporation	1-531391	2475 W.La Palma Ave, Anaheim, CA 92801	335311	433.17(a)	2	11	4		
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	4	11	3		
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E.Rossllynn Ave, Fullerton, CA 92831	322211	403.5(d)	2	10	3		
Markland Manufacturing, Inc.	1-011046	1111 E.McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	2	15	14		
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	2	4	2		
Maruchan, Inc. (Deere-South)	1-601021	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	2	4	3		
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, Irvine, CA 92618	311824	403.5(d)	2	3	4		
Marukome USA, Inc.	1-141023	17132 Pullman St, Irvine, CA 92614	311991	403.5(d)	2	10	2		
Master Wash, Inc.	1-511399	3120 Kilson St, Santa Ana, CA 92707	811192	403.5(d)	2	7	2		
McKenna Labs, Inc.	1-021422	1601 E.Orangethorpe Ave, Fullerton, CA 92831	325620	417.86	2	8	2		
MCP Foods, Inc.	1-021029	424 S.Atchison St, Anaheim, CA 92805	311942	403.5(d)	4	8	0		
Meggitt (Orange County), Inc.	1-601115	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	1	5	5	Lead,Silver	New Class 1 Permit Issued
Meggitt, Inc.	1-600006	14600 Myford Rd, Irvine, CA 92606	334519	433.17(a)	0	0	0		Class 1 Permit Deactivated
Merical, LLC	1-600655	233 E.Bristol Ln, Orange, CA 92865	325412	439.47	2	9	7		
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	2	11	4		
Micrometals, Inc.	1-021153	5615 E.La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	4	16	3	pH	
Murrietta Circuits	1-521811	5000 E.Landon St, Anaheim, CA 92807	334412	433.17(a)	2	13	4		
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	2	11	2		
National Construction Rentals	1-600652	1550 E.Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	2	8	1		
Neutron Plating, Inc.	Z-321812	2993 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0		
Neutronic Stamping and Plating	1-521772	10535 Lawson River Ave, Fountain Valley, CA 92708	334417	433.17(a)	2	11	4		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	403.5(d)	7	9	4	Copper	
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	2	9	1		
Newport Fab, LLC (dba TowerJazz Semiconductor)	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	2	12	1		
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	2	11	8		
Nor-Cal Beverage Co., Inc. (Main)	1-021284	1226 N.Olive St, Anaheim, CA 92801	312111	403.5(d)	3	12	0		
Nor-Cal Beverage Co., Inc. (NCB)	1-021283	1226 N.Olive St, Anaheim, CA 92801	312111	403.5(d)	3	12	0	pH	
Nu-Tec Powder Coating	Z-321383	2990 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0		Zero Discharge Certification Deactivated
O'Donnell Oil Company, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	403.5(d)	2	7	0		
O.C. Waste & Recycling	1-141018	20661 Newport Coast Dr, Newport Beach, CA 92657	562910	403.5(d)	2	10	2		
Oakley, Inc.	1-141012	1 Icon Unk, Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	2	0	0		
Omni Metal Finishing, Inc.	1-021520	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	3	13	10		
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley Riv, Fountain Valley, CA 92708	332813	433.17(a)	6	12	4	Cadmium	
Only Cremations for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	2	8	2		New Class 1 Permit Issued
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	2	7	1		
Orange County Chemical Supply, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	2	12	2		
Ortronics, Inc.	Z-601203	1443 S.Sunkist St, Anaheim, CA 92806	332999	433.17(a)	1	0	0		New Zero Discharge Certification Issued
Pacific Chrome Services	Z-311396	603 E.Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	1	0	0		
Pacific Image Technology, Inc.	1-021070	1875 S.Santa Cruz St, Anaheim, CA 92805	334112	433.17(a)	2	12	4		
Pacific Western Container	1-511371	4044 W.Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	2	8	2		
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	0	0	0		
Patio and Door Outlet, Inc.	1-521783	410 W.Fletcher Ave, Orange, CA 92865	332812	433.17(a)	2	13	0		
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W.Freedom Ave, Orange, CA 92865	562219	437.47(b)	2	16	21		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W.Freedom Ave, Orange, CA 92865	562219	403.5(d)	2	13	8		
Performance Powder, Inc.	1-521805	2920 E.La Jolla St, Anaheim, CA 92806	332812	433.17(a)	2	13	4	Zinc	
Petroprize Corporation	1-581180	319 20th St, Huntington Beach, CA 92648	211111	403.5(d)	2	9	2		
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	1	7	2		
Pioneer Circuits, Inc.	1-011262	3010 S.Shannon St, Santa Ana, CA 92704	334412	433.17(a)	2	13	10		
Platinum Surface Coating, Inc.	1-521852	1173 N.Fountain Way, Anaheim, CA 92806	332813	433.17(a)	2	9	5		
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way, Placentia, CA 92870	211111	403.5(d)	2	8	2		
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St, Yorba Linda, CA 92886	211111	403.5(d)	2	8	2		
Porter Powder Coating, Inc.	Z-321817	510 S.Rose St, Anaheim, CA 92805	332812	433.17(a)	0	0	0		
Powdercoat Professionals Inc.	Z-600275	2905 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0		
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N.Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	3	10	4		
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N.Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	2	9	4		
PowderCoat Services, LLC. Plant 5	1-600355	1747 W.Lincoln Ave, L1 Unit, Anaheim, CA 92801	332812	433.17(a)	1	7	2		New Class 1 Permit Issued
Power Distribution, Inc.	1-511400	4011 W.Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	2	12	2		
Powerdrive Oil & Gas Company, LLC (16th)	1-600246	613 16th St, Huntington Beach, CA 92648	211111	403.5(d)	2	0	0		
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	120 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	2	4	2		
Powerdrive Oil & Gas Company, LLC (Surveyor)	1-600245	21632 Surveyor Cir, Huntington Beach, CA 92646	211111	403.5(d)	2	0	0		
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	2	19	4		
Precision Anodizing & Plating, Inc.	1-521809	1601 N.Miller St, Anaheim, CA 92806	332813	433.17(a)	2	15	10		
Precision Circuits West, Inc.	1-011008	3310 W.Harvard St, Santa Ana, CA 92704	334412	433.17(a)	2	13	4		
Precision Resource, California Division	1-111002	5803 Engineer St, Huntington Beach, CA 92649	332710	403.5(d)	2	8	4		
Precon, Inc.	1-021581	3131 E.La Palma Ave, Anaheim, CA 92806	332721	403.5(d)	2	12	9		

APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	2	10	2		
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	3	12	4		
Pulmuone Wildwood, Inc.	1-531397	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	2	11	0		
Q-Flex Inc.	1-600337	1301 E.Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	2	13	4	Silver	
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N.Cypress St, Orange, CA 92867	332112	467.45	4	14	2		
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N.Cypress St, Orange, CA 92867	332112	467.46	3	15	3	pH	
Quikturn Professional Screenprinting	1-521858	567 S.Melrose St, Placentia, CA 92870	333249	403.5(d)	2	10	2		
Rainbow Disposal Co., Inc. (Building A)	1-601086	17121 Nichols Ln, Huntington Beach, CA 92647	562111	403.5(d)	1	0	0		Class 1 Permit Deactivated
Rainbow Disposal Co., Inc. (Building F)	1-601087	17121 Nichols Ln, Huntington Beach, CA 92647	562111	403.5(d)	3	7	2		Class 1 Permit Deactivated
Rayne Dealership Corporation	1-571303	17835 Sky Park Cir, M Ste, Irvine, CA 92614	454390	403.5(d)	2	10	1		
RBC Transport Dynamics Corp.	1-011013	3131 W.Segerstrom Ave, Santa Ana, CA 92704	336413	433.17(a)	2	11	8		
Republic Waste Services	1-521827	2727 Coronado St, Anaheim, CA 92806	56211	403.5(d)	3	15	9		
Republic Waste Services of So. Cal., LLC	1-021169	1235 N.Blue Gum St, Anaheim, CA 92806	562111	403.5(d)	5	14	3	pH	
Rich Products Corporation (North)	1-601022	3401 W.Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	2	10	2		
Rich Products Corporation (South)	1-511404	3401 W.Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	2	11	2		
Rigiflex Technology, Inc.	1-021187	1166 N.Grove St, Anaheim, CA 92806	334418	433.17(a)	2	11	4		
Robinson Pharma, Inc. (Croddy)	1-511413	2632 S.Croddy Way, Santa Ana, CA 92704	325411	439.47	2	0	0		
Robinson Pharma, Inc. (Harbor North)	1-600126	2811 S.Harbor Blvd, Santa Ana, CA 92704	325412	439.47	2	12	7		
Robinson Pharma, Inc. (Harbor South)	1-511412	3330 S.Harbor Blvd, Santa Ana, CA 92704	325411	439.47	3	14	7		
Rolls-Royce HTC	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	2	6	3		
Rolls-Royce HTC (fume scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	2	8	1		
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 LotBlk, Huntington Beach, CA 92648	211111	403.5(d)	2	9	2		

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ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
RSS Manufacturing	Z-600635	1275 Logan Ave, Costa Mesa, CA 92626	332913	433.17(a)	0	0	0		
S & C Oil Co., Inc.	1-581175	18742 Goldenwest St, Huntington Beach, CA 92649	211111	403.5(d)	2	10	1		
Safety-Kleen Systems, Inc.	1-600690	2170 S.Yale St, Santa Ana, CA 92704	562211	403.5(d)	0	0	0		New Class 1 Permit Issued
Safran Electronics & Defense, Avionics USA, LLC.	1-571304	3184 Pullman St, Costa Mesa, CA 92626	335931	433.17(a)	3	15	7		
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	2	16	10		
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	2	15	10		
Santana Services	1-021016	1224 E.Ash Ave, Fullerton, CA 92831	332813	433.17(a)	2	9	4		
Schreiber Foods, Inc.	1-021049	1901 Via Burton None, Fullerton, CA 92831	311511	403.5(d)	4	6	0		
Scientific Spray Finishes, Inc.	1-031311	315 S.Richman Ave, Fullerton, CA 92832	332812	433.17(a)	2	15	4		
Semicoa	1-571313	333 McCormick Ave, Costa Mesa, CA 92626	334413	469.18(a)	2	12	5		
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	3	6	4		
SFPP, LP	1-021619	1350 N.Main St, Orange, CA 92867	493190	403.5(d)	4	6	4		
Shepard Bros., Inc.	1-031034	503 S.Cypress St, La Habra, CA 90631	325611	417.166, 417.176	2	18	2		
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332722	433.17(a)	3	0	0		
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	3	11	6		
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	3	8	4		
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	3	13	10		
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	3	11	2		
South Coast Circuits, Inc. (Bldg 3500 A)	1-011069	3500 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	17	10		
South Coast Circuits, Inc. (Bldg 3506 A)	1-011030	3506 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	13	4		
South Coast Circuits, Inc. (Bldg 3512 A)	1-511365	3512 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	17	10		
South Coast Circuits, Inc. (Bldg 3524 A)	1-011054	3524 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	17	4		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
South Coast Water	1-511405	401 S.Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	2	10	3		
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	2	8	1		
Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	2	8	1		
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	2	8	1		
Spectrum Paint And Powder, Inc.	Z-321822	1332 S.Allec St, Anaheim, CA 92805	332812	433.17(a)	0	0	0		
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	2	12	4		
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E.Warner Ave, Santa Ana, CA 92705	332722	433.17(a), 467.46, 467.66, 471.35(ee), 471.35(ff), 471.35(ff), 471.35(j), 471.35(l), 471.35(m), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	2	23	19	Cadmium	
Stainless Micro-Polish, Inc.	1-021672	1286 N.Grove St, Anaheim, CA 92806	332813	433.17(a)	2	15	4		
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W.Collins Ave, Orange, CA 92867	332119	403.5(d)	5	19	37	O&G min.	
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	5	9	4		
Statek Corporation (Gold/Nickel Plating)	Z-600201	512 N.Main St, Orange, CA 92868	334419	403.5(d)	0	0	0		Zero Discharge Certification Deactivated
Statek Corporation (Main)	1-021664	512 N.Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	2	12	3		

APPENDIX 1
LISTS OF SIUs WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Statek Corporation (Orange Grove)	1-521777	1449 W.Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	2	13	1		
Stepan Company	1-021674	1208 N.Patt St, Anaheim, CA 92801	325613	417.106, 417.96	2	10	5		
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave, Santa Ana, CA 92703	311511	405.16, 405.26, 405.76	2	11	0		
Summit Interconnect, Inc.	1-600012	223 N.Crescent Way, Anaheim, CA 92801	334412	433.17(a)	2	15	9		
Summit Interconnect, Inc., Orange Division	1-600060	230 W.Bristol Ln, Orange, CA 92865	334412	433.17(a)	2	15	10		
Sunny Delight Beverages Co.	1-021045	1230 N.Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	4	9	0		
Superior Plating	1-021090	1901 E.Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	2	12	34	CN	
Superior Processing	1-021403	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	2	11	4		
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	2	9	4		
Taylor-Dunn Manufacturing Company	1-021123	2114 Ball Rd, Anaheim, CA 92804	333924	433.17(a)	3	15	4		
Teva Parenteral Medicines, Inc.	1-141007	19 Hughes Unk, Irvine, CA 92618	325412	439.47	2	11	0		
Thermal-Vac Technology, Inc.	1-021282	1221 W.Struck Ave, Orange, CA 92867	332410	433.17(a)	2	13	10		
Thompson Energy Resources, LLC	1-521773	3351 E.Birch St, Brea, CA 92821	211111	403.5(d)	2	0	0		
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	336412	433.17(a)	2	10	5		
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	2	15	10		
Toyota Racing Development	1-071059	335 Baker St, Costa Mesa, CA 92626	336310	403.5(d)	3	10	5		
Transline Technology, Inc.	1-021202	1106 S.Technology Cir, Anaheim, CA 92805	334412	433.17(a)	2	12	4		
Tropitone Furniture Co., Inc.	1-141163	5 Marconi Unk, Irvine, CA 92618	337124	433.17(a)	3	13	4		
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E.Coronado St, Anaheim, CA 92806	334412	433.17(a)	2	13	10	Copper	
TTM Technologies North America, LLC. (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	2	19	10		
TTM Technologies North America, LLC. (Harbor)	1-511359	2640 S.Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	2	15	14		
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	403.5(d)	2	10	2		



APPENDIX 1
LISTS OF SIUS WITH MONITORING COMPLIANCE STATUS, JULY-DEC 2020
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Universal Alloy Corp.	1-021706	2871 La Mesa Ave, Anaheim, CA 92806	331318	467.35(c)	1	0	0		Class 1 Permit Deactivated
Universal Molding Co.	1-521836	1551 E.Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	2	15	4		
US Display Group, Inc.	1-601226	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	0	0	0		New Class 1 Permit Issued
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	2	10	0		
Vi-Cal Metals, Inc.	1-521846	1400 N.Baxter St, Anaheim, CA 92806	562920	403.5(d)	5	0	1		
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325411	439.47	2	31	7		
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	0	0	0		
Weartech	Z-600242	1177 N.Grove St, Anaheim, CA 92806	333992	403.5(d)	3	0	0		Zero Discharge Certification Deactivated
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	1	7	2		
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	1260 N.Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	0	0	0		New Class 1 Permit Issued
Weidemann Water Conditioners, Inc. (Fullerton)	1-021653	1702 E.Rosslynn Ave, Fullerton, CA 92831	333318	403.5(d)	2	10	2		
West Newport Oil Company	1-061110	1080 W.17th St, Costa Mesa, CA 92627	211111	403.5(d)	2	14	7		
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	403.5(d)	2	14	2		
Winonics (Brea)	1-031035	660 N.Puente St, Brea, CA 92821	334412	433.17(a)	2	15	4		
Winonics, Inc.	1-021735	1257 State College Blvd, Fullerton, CA 92831	334412	433.17(a)	2	11	10		
Yakult USA, Inc.	1-521850	17235 Newhope St, Fountain Valley, CA 92708	311511	403.5(d)	2	10	6		

Notes:

NAICS North American Industry Classification System
 SIUs significant industrial users
 SMR self-monitoring report

ORANGE COUNTY SANITATION DISTRICT

RESOURCE PROTECTION DIVISION

**SAWPA MONITORING AND
COMPLIANCE
STATUS REPORT**

APPENDIX 2

**1st and 2nd Quarters
FISCAL YEAR 2020/2021**

APPENDIX 2
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1 - DECEMBER 31, 2020
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anita B. Smith Treatment Facility	Western	Direct	D1074-4	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	2	4	2			
Aramark Uniform & Career Apparel, LLC	Western	Direct	D1004-1.1	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	4	8	14			
California Institution for Men	IEUA	Direct	D1006-3	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	2	4	13			
Chino I Desalter	SAWPA	Direct	D1081-4	6905 Kimball Avenue Chino, CA 91709	221310	SIU	403.5(d)	-	2	4	2			
Chino II Desalter	SAWPA	Direct	D1010-4	11251 Harrel Street Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	8	4			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-1	715 East 4th Street Beaumont, CA 92223	221320	SIU	403.5(d)	-	2	2	16			New Permit Issued 8/6/2020
City of Colton - Agua Mansa Power Plant	VALLEY	Direct	D1002-4	2040 W. Agua Mansa Road Colton, CA 92324	221122	SIU	403.5(d)	-	2	10	10			
City of Corona Ion Exchange Treatment Plant	Western	Direct	D1125-2	410 Rimpau Avenue Corona, CA 92882	221310	SIU	403.5(d)	-	2	4	2			
City of Corona's Water Reclamation Facility No.1	Western	Direct - Emergency	E1013-2.1	2205 Railroad Street Corona, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 8/30/2020
Dart Container Corporation	Western	Direct	D1019-3	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	2	9	2			
Del Real, LLC	JCSD	Direct	D1021-3	11041 Inland Avenue Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	4	28	20			
EMWD Energy Dissipater	SAWPA	Direct - Emergency	E1068-2.1	636 Minthorn Street Lake Elsinore, CA 92530	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/10/2020
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-3	29541 Murrieta Road Menifee, CA 92586	221310	SIU	403.5(d)	-	2	4	2			
EMWD Railroad Canyon Pipeline	SAWPA	Direct - Emergency	E1067-3.1	Railroad Canyon Road Canyon Lake, CA 92587	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 12/9/2020
Giuliano & Sons Briners	Western	Indirect	I1031-3	10380 Alder Avenue Bloomington, CA 92316	311421	SIU	403.5(d)	-	2	2	0			Permit Closed 11/4/2020
IEUA Los Serranos	SAWPA	Direct - Emergency	E1037-2.1	6075 Kimball Avenue Chino, CA 91708	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/27/2020
Infineon Technologies Americas Corporation	EMWD	Indirect	I1039-4	41915 Business Park Drive Temecula, CA 92590	334413	CIU	469.18	Y	2	7	4			

APPENDIX 2
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1 - DECEMBER 31, 2020
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
JCSD Archibald Metering Station	SAWPA	Direct - Emergency	E1041-2.1	6990 Archibald Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 12/5/2020
JCSD Celebration Metering Station	SAWPA	Direct - Emergency	E1042-2.1	5972 Hamner Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/27/2020
JCSD Chandler Lift Station	SAWPA	Direct - Emergency	E1043-2.1	14087 Chandler Street Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/4/2020
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-4	Etiwanda Avenue and N. of Bellegrave Avenue Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	2	22	13			
JCSD Hamner Lift Station	SAWPA	Direct - Emergency	E1046-2.3	7302 Hamner Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/19/2020
JCSD Hamner Metering Station	SAWPA	Direct	D1045-4	5410 Hamner Avenue Eastvale, CA 91752	221320	SIU	403.5(d)	-	2	8	8			
JCSD Harrison Metering Station	SAWPA	Direct - Emergency	E1047-2.3	6998 Harrison Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/20/2020
JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SAWPA	Direct	D1070-4	4150 Etiwanda Avenue Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	1	4	4			
JCSD Scholar Way Metering Station	SAWPA	Direct - Emergency	E1113-1.1	6980 Scholar Way Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/14/2020
JCSD Wineville Metering Station	SAWPA	Direct	D1048-4	5101 Wineville Avenue Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	2	12	12			
JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-4	3474 De Forest Circle Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	0	0			
Metal Container Corporation	JCSD	Direct	D1056-3	10980 Inland Avenue Jurupa Valley, CA 91752	332431	CIU	465.45(d)	-	2	14	8			
Mission Linen Supply	IEUA	Direct	D1057-4	5400 Alton Street Chino, CA 91710	812332	SIU	403.5(d)	-	2	20	21			
Mountainview Generating Station	VALLEY	Direct	D1058-2	2492 W. San Bernardino Ave. Redlands, CA 92374	221112	CIU	423.17	-	2	11	11			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-2	1401 N. Alder Avenue Rialto, CA 92376	312112	SIU	403.5(d)	-	1	3	14			New SIU Permit Issued 7/14/2020
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-2	1401 N. Alder Avenue Rialto, CA 92376	312112	SIU	403.5(d)	-	2	12	13			New SIU Permit Issued 7/14/2020
OLS Energy	IEUA	Direct	D1059-3	5601 Eucalyptus Avenue Chino, CA 91710	221112	CIU	423.17	-	2	16	22			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-4	3400 Pyrite Street Jurupa Valley, CA 92509	291056221	SIU	403.5(d)	-	2	21	139			

APPENDIX 2
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1 - DECEMBER 31, 2020
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Rayne Water Conditioning	SBMWD	Indirect	I1066-3	939 W. Reece Street San Bernadino, CA 92411	238220 454390 561990	SIU	403.5(d)	-	3	26	9	Copper		
Repet, Inc.	IEUA	Direct	D1069-4.1	14207 Monte Vista Avenue Chino, CA 91710	423930	SIU	403.5(d)	-	2	19	19			
Rialto Bioenergy Facility, LLC	VALLEY	Direct	D1130-1	503 E. Santa Ana Avenue Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	2	0	60	TSS and pH		New Permit Issued 12/7/2020
SBMWD Water Reclamation Plant	SAWPA	Direct - Emergency	E1075-2.2	399 Chandler Place San Bernardino, CA 92408	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 10/26/2020
Temescal Desalter	Western	Direct	D1012-4	745 Public Safety Way Corona, CA 92880	221310	SIU	403.5(d)	-	2	4	2			
Wellington Foods, Inc.	Western	Direct	D1086-4	1930 California Avenue Corona, CA 92881	311999	SIU	403.5(d)	-	4	8	4			New SIU Permit Issued 11/12/2020
WMWD Arlington Desalter	SAWPA	Direct	D1088-4.1	11611 Sterling Avenue Riverside, CA 92503	221310	SIU	403.5(d)	-	2	4	2			
WRCRWA South Regional Pumping Station	SAWPA	Direct - Emergency	E1089-2.1	671 N. Lincoln Avenue Corona, CA 92883	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 10/29/2020
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-3	880 W. County Line Road Calimesa, CA 92320	221320 221310	SIU	403.5(d)	-	2	4	4			

Abbreviations:

CIU	categorical industrial users
EMWD	Eastern Municipal Water District
IEUA	Inland Empire Utilities Agency
JCSD	Jurupa Community Services District
NAICS	North American Industry Classification System
SAWPA	Santa Ana Watershed Project Authority
SBMWD	San Bernadino Municipal Water Department
SIU	significant industrial users
SMR	self-monitoring report
SNC	significant non-compliance
TSS	total suspended solids
TTO	total toxic organics
VALLEY	San Bernadino Valley Municipal Water District