Orange County
Sanitation District

Semi-Annual Pretreatment Program Report

Resource Protection Division

JULY - DECEMBER
Fiscal Year 2019/2020

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Orange County Sanitation District
10844 Ellis Avenue, Fountain Valley, CA 92708
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March 30, 2020

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, 2019

The Orange County Sanitation District (OCSD) is submitting this semi-annual report for enforcement activities conducted during the period of July 1 through December 31, 2019. These activities include inspection and sampling of permittees, enforcement actions OCSD has taken to remedy noncompliance, and information on the Santa Ana Watershed Project Authority pretreatment program under OCSD's jurisdiction.

Appendix 1 of this report, entitled Monitoring and Compliance Status Report, contains the number of industrial inspections and the number of OCSD and self-monitoring samples for each OCSD Class I permittee for the first and second quarters of Fiscal Year 2019/20.

If you or your staff have any questions, please contact me at (714) 593-7437 or Lori McKinley at (714) 593-7505.

Roya Sohanaki
Engineering Manager, Resource Protection Division

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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

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

03/30/2020
Date

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PERMITS AND CERTIFICATIONS

1.0 PERMITS AND CERTIFICATION

1.1 Introduction

Orange County Sanitation District (OCSD) 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 OCSD permits issued and deactivated for the period July 1, 2019 through December 31, 2019.

There are seven permit & certification classifications for users that are administrated by OCSD'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, six (6) new permits were issued, and seven (7) 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 OCSD'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 OCSD 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 OCSD, 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, four (4) new permits were issued for those users who are engaged in vehicular transport and disposal of acceptable domestic waste into OCSD's wastehauler station.

1.5 Special Purpose Discharge Permits

During this reporting period, six (6) new permits were issued and eight (8) permits were deactivated for those users who discharge groundwater, subsurface drainage, unpolluted water, or other wastewater to OCSD'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

OCSD 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. OCSD 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

OCSD'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). OCSD currently manages the FOG control program for 38 FSEs that discharge directly into OCSD owned trunklines in the City of Orange.

During this reporting period, OCSD renewed eight (8) FOG permits to existing permittees, and one (1) FOG permittee was deactivated. No new FSEs were identified in OCSD's direct service area.

1.8 Discharge Certifications

During this reporting period, no new Discharge Certifications were issued, and none were deactivated. One (1) new Zero Discharge Certification was issued, and one (1) 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, 2019 period, is shown in Table 1.1.

TABLE 1.1 – ACTIVE PERMITS AND CERTIFICATIONS July 1 - December 31, 2019
Orange County Sanitation District, Resource Protection Division

Permit / Certification Type	New Issuance	Deactivated	Effective During Reporting Period
Class I (SIU)	6	7	325
Class I Categorical (CIU)	*4*	*5*	*180*
Class I Non-Categorical	*2*	*2*	*145*
Discharge Certification	0	0	2
Zero Discharge Certification	1	1	22
Class II	0	0	21
Wastehauler	4	0	39
Special Purpose	6	8	54
Urban Runoff	0	0	21
FOG	0	1	38
TOTAL	23	24	522

chapter 2

ENFORCEMENT

2.0 ENFORCEMENT

2.1 Introduction

The goal of the Orange County Sanitation District's (OCSD) industrial wastewater enforcement program is to bring its permitted industrial users into compliance with OCSD'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 OCSD initiated or continued against noncompliant permittees for the semi-annual reporting period of July 1, 2019 through December 31, 2019.

Appendix 1 of this report, entitled Monitoring and Compliance Status Report, contains information regarding the number of industrial inspections and the number of OCSD and self-monitoring samples taken for each Class I permittee for the first and second quarters of Fiscal Year 2019/20. 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.

Thirty-seven (37) 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 OCSD staff to discuss issues and proposed solutions.

Fifteen (15) 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.

Twenty-Six (26) 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.

Nine (9) 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 OCSD 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.

Sixty (60) Notices of Violation were issued in the first and second quarters.

2.7 Probation Orders

Pursuant to Section 603.1 of OCSD's Ordinance, a Probation Order may be issued if a permittee has violated any terms, conditions, or limits of its discharge permit or OCSD's Ordinance, or has not paid all amounts owed to OCSD. 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.

One (1) 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, OCSD 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.

One (1) ECSA was 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 OCSD 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 OCSD. 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 OCSD'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 OCSD'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, OCSD may issue an Administrative Complaint against the responsible officer or owner of any permittee that violates any permit condition or effluent limit.

Administrative penalties were issued in two (2) Administrative Compliant Settlement Agreements during the first and second quarters.

2.11 Permit Suspension

OCSD 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 OCSD 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, OCSD 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

OCSD 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 OCSD 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, OCSD 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 OCSD'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 OCSD's sewerage facilities; or may cause OCSD 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, OCSD may petition to the Superior Court for the issuance of a preliminary or permanent restraining order. In addition, OCSD 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 OCSD'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, 2019, and whether the violation(s) exceeded Federal Categorical Standard (FCS) Limits, OCSD Local Limits, or both.

TABLE 2.1 - INDUSTRIES WITH DISCHARGE VIOLATIONS July 1 - December 31, 2019
Orange County Sanitation District, Resource Protection Division

Facility	Permit No.	Pollutant(s) in Violation	Date	Exceeded Federal Categorical Limit	Exceeded Local Limit
Advance Tech Plating, Inc.	1-021389	Zinc	08/06/2019	√	√
Aluminum Precision Products, Inc. (Susan)	1-011100	Zinc	11/05/2019		√
Anchen Pharmaceuticals, Inc. (Fairbanks)	1-541180	pH	11/08/2019		√
Anchen Pharmaceuticals, Inc. (Goodyear)	1-600359	Acetone	12/23/2019	√	
Arconic Global Fastening Systems Inc.	1-021081	Molybdenum	09/17/2019		√
		Molybdenum	09/19/2019		√
Bodycote Thermal Processing	1-031120	Molybdenum	10/30/2019		√
Brea Power II, LLC	1-521837	pH	07/31/2019		√
Bristol Industries	1-021226	Cadmium	07/11/2019	√	√
		Nickel	07/11/2019	√	√
		Silver	07/11/2019	√	√
		Silver	09/06/2019		√
		CN	10/29/2019	√	
		CN amen.	10/29/2019	√	
		Cadmium	11/14/2019	√	
		Cadmium	11/20/2019	√	
		Cadmium	11/27/2019	√	
		Cadmium	12/04/2019	√	
		CN amen.	12/04/2019	√	
		CN amen.	12/12/2019	√	
		Cadmium	12/27/2019	√	
		CN	12/27/2019	√	
Brothers International Desserts (North)	1-600583	pH	09/09/2019		√
Coast to Coast Circuits, Inc.	1-111129	pH	10/02/2019		√
Corru-Kraft Buena Park	2-032085 & 1-600806	pH	09/12/2019		√

TABLE 2.1 - INDUSTRIES WITH DISCHARGE VIOLATIONS July 1 - December 31, 2019 Orange County Sanitation District, Resource Protection Division					
Facility	Permit No.	Pollutant(s) in Violation	Date	Exceeded Federal Categorical Limit	Exceeded Local Limit
CP-Carrillo, Inc. (Armstrong)	1-600920	pH	10/25/2019		√
Data Aire, Inc. #2	1-021379	pH	07/25/2019		√
		pH	07/26/2019		√
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	pH	08/21/2019		√
Electrolurgy, Inc.	1-071162	Silver	08/28/2019	√	
Gemini Industries, Inc.	1-071172	Molybdenum	11/06/2019		√
Hixson Metal Finishing	1-061115	Cadmium	11/19/2019	√	√
Linco Industries, Inc.	1-021253	Zinc	10/15/2019		√
Meggitt, Inc.	1-600006	Lead	08/02/2019	√	
National Construction Rentals	1-600652	pH	11/04/2019		√
		pH	11/05/2019		√
Republic Waste Services	1-521827	Chromium	07/18/2019		√
		Copper	07/18/2019		√
		Lead	07/18/2019		√
		Nickel	07/18/2019		√
		Zinc	07/18/2019		√
		Copper	11/07/2019		√
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	O&G min.	07/10/2019		√
Stremicks Heritage Foods, LLC	1-021028	pH	11/20/2019		√
Superior Plating	1-021090	CN	08/14/2019	√	
Superior Processing	1-021403	Nickel	07/30/2019	√	√
		Nickel	12/03/2019	√	√
Thompson Energy Resources, LLC	1-521773	O&G min.	08/28/2019		√
			11/13/2019		√

2.16 Enforcement – Summary by Permittee

This section summarizes various enforcement actions conducted for permittees in the first half of FY 2019/20. Potential enforcement actions include permit revocations, permit suspensions, compliance inspections, compliance meetings, probation orders, enforcement compliance schedule agreements (ECSA), orders to cease, among others.

A & R Powder Coating, Inc. (Permit No. 1-021088)

A & R Powder Coating, Inc. (A & R) performs powder coating and painting. Cold rolled steel and aluminum parts are brought in by outside customers. The parts are processed through an iron phosphate conversion coating line and then heated briefly in an oven to dry off residual moisture prior to spray painting or powder coating per customer requirements. A & R employs a batch holding tank to store wastewater from the iron phosphate wash line. The batch is reportedly allowed to sit overnight and checked for zinc concentration with a Hach field test kit periodically, with the results entered onto a logbook. After testing and inspection, the tank is drained the next morning into a small three-stage clarifier. The holding tank is opaque and has a conical bottom for ease of inspection and solids removal, and a cartridge filter system is installed on the inlet plumbing line to remove solids during transfer of the rinse water from the wash line.

In June 2019, A & R Powder Coating (A & R) had a molybdenum violation.

July 1 – December 31, 2019

On **August 8, 2019**, OCSD issued a Notice of Violation for the previous month's molybdenum noncompliance. On **September 4, 2019**, OCSD conducted a Compliance Inspection and resampling. The iron phosphate solution used at A & R had previously been identified to be the source of violation as it contained sodium molybdate. During the inspection, A & R mentioned that in mid-August, shortly after receiving the Notice of Violation, A & R pumped out the tanks and clarifier and replaced the iron phosphate solution with a non-molybdate chemical to prevent future violations. The resampling results showed compliance.

A & R had no further violations during this reporting period. OCSD will continue to monitor A & R's discharge and compliance status on a quarterly basis.

Accurate Circuit Engineering (Permit No. 1-011138)

Accurate Circuit Engineering (Accurate) is a printed circuit board (PCB) manufacturer with an in-house design and engineering team, as well as large scale manufacturing operations. Accurate manufactures various types of PCBs, including rigid single sided, rigid double-sided, and rigid multilayer. Wastewater is primarily generated by the photo developing operations, etching, scrubbing via hyoki, alkaline cleaning, Cobra bond micro-etch, black oxide line, electroless copper and electrolytic copper plating, screen wash booths, cross-sectional grinding and associated rinses. Pretreatment consists of continuous ion exchange and hydroxide precipitation.

In April 2019, Accurate had silver daily and monthly average discharge limit violations, as well as a copper monthly average discharge limit violation. In May 2019, OCSD issued a Notice of Violation for the silver daily limit violation. OCSD conducted a Compliance Inspection during which it was determined that the silver recovery unit was not operating properly and Accurate was not verifying silver compliance before discharging to the sewer. Accurate opted to wastehaul all developer wastewater to avoid future silver violations.

July 1 – December 31, 2019

On **July 1, 2019**, OCSD issued a Notice of Violation for the April 2019 copper and silver monthly limit violations. Accurate had no further violations during this reporting period. OCSD will continue to monitor Accurate's discharge and compliance status on a quarterly basis.

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 2018, Active Plating had a zinc violation, and was issued a Notice of Violation. In May 2018, OCSD conducted a Compliance Inspection during which the pH and ORP probes were found not operating properly. OCSD also noted that Active Plating periodically takes one of the clarification tanks off-line for batch treatment or solids removal. When this occurs, floc carry-over into the sample point becomes an issue due to reduced treatment capacity. In June 2018, OCSD held a Compliance Meeting with Active Plating during which the company was required to come up with a long-term solution for implementing effective process controls and treatment when one clarification tank is offline. The company was also required to submit detailed pretreatment system drawings and an updated facility plot plan.

In October 2018, Active Plating had another zinc violation, and was issued another Notice of Violation. In December 2018, OCSD conducted a follow-up Compliance Inspection during which treatment concerns involving hydraulic capacity of the system were identified. Hence, OCSD issued a Compliance Requirements Letter to Active Plating to address the noted deficiency.

In January 2019, OCSD held a Compliance Meeting with Active Plating to discuss corrective actions. In April 2019, OCSD issued a Probation Order providing deadlines for corrective actions. In June 2019, OCSD issued another Compliance Requirement Letter extending Probation Order deadlines.

July 1 – December 31, 2019

On **September 4, 2019**, OCSD observed a flexible hose discharging city water into Active Plating's sample point while Active Plating was conducting self-monitoring. Thus, on **September 24, 2019**, OCSD issued an Order to Cease Noncompliant Discharges requiring the company to take immediate corrective actions to prevent dilution sources. Additionally, on **September 24, 2019**, OCSD issued a follow-up Compliance Requirements Letter to address Active Plating's failure to submit documents required in the Probation Order and attend a Compliance Meeting. On **October 29, 2019**, OCSD held the Compliance Meeting with Active Plating, during which OCSD informed Active Plating of its intention to issue an Administrative Complaint. Active Plating expressed interest in settling the matters with OCSD. An Administrative Complaint Settlement Agreement will be issued 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 and aluminum parts 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. Majority 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 and major zinc, copper, and nickel daily and monthly average discharge limit violations. OCSD issued ATP Notices of Violation along with an Order to Cease Noncompliant Discharges due to the severity of the violations. OCSD 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, OCSD 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, having a qualified operator present during all discharge hours, maintaining the pretreatment tanks, good housekeeping, and performing a hydraulic evaluation of the pretreatment system.

July 1 – December 31, 2019

On **July 9, 2019**, OCSD issued a Compliance Requirements Letter requiring ATP to have a qualified operator present during all discharge hours, maintain the pretreatment tanks, have good housekeeping, and perform a hydraulic evaluation of the pretreatment system by the end of **August 2019**. On **August 6, 2019**, ATP had multiple major zinc violations. On **August 8** and **August 21, 2019**, Notices of Violation were issued to ATP to address the May 2019 monthly limit violations and the most recent zinc violations, respectively. On **September 9, 2019**, OCSD conducted a Compliance Inspection during which ATP attributed the violation 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. OCSD 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 partially treated wastewater to the continuous system.

The installation of a low/high pH alarm and automatic controller was completed and confirmed on **October 7, 2019**. At OCSD's direction, ATP conducted multi-day sampling starting **October 7, 2019** until **October 12, 2019** to verify compliance after the installation. The multi-day sampling results showed compliance. On **November 4, 2019**, OCSD issued a Notice of Violation for the August 2019 zinc monthly limit violation. Furthermore, OCSD increased the frequency of ATP's heavy metals self-monitoring requirements from monthly to weekly effective **December 1, 2019**.

OCSD 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.

July 1 – December 31, 2019

On **July 9, 2019**, OCSD issued a Notice of Violation for the previous month's pH violation. On **August 2, 2019**, OCSD 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. On **August 7, 2019**, Alliance submitted a corrective action letter, which included implementation of a new batch process where all CIP wastewater will be discharged to a waste drum. This wastewater will be analyzed 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, OCSD 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. OCSD will issue a Compliance Requirements Letter during the next reporting period to address the sample point issue.

Aluminum Precision Products, Inc. - Susan (Permit No. 1-011100)

Aluminum Precision Products, Inc. – Susan (Aluminum Precision) manufactures parts for the aerospace, automotive, commercial, military/defense, recreational, and transportation industries utilizing hot press forging techniques. Support services include assembly, CNC machining, engineering, mold making, painting, and plating. Some metal finishing and painting operations are performed offsite by outside vendors. The company performs cleaning/chemical etching on forged parts using acidic and caustic solutions, however, these finishing operations default to forming regulations. Wastewater is generated by multiple stage countercurrent rinses following the etching/deoxidation operations, the spray rinse following the dye penetrant testing/inspection, and the spent solutions from the vibratory deburring operations. Pretreatment at Aluminum Precision consists of a continuous hydroxide precipitation system.

July 1 – December 31, 2019

On **November 5, 2019**, Aluminum Precision had a zinc violation, for which a Notice of Violation was issued on **November 26, 2019.** On **December 17, 2019,** Aluminum Precision submitted a written description of the cause of the violation and the corrective actions taken by the company. Aluminum Precision attributed the violation to a faulty pH probe in the receiving/pH adjustment tank. The pH probe had since been replaced and an additional probe was installed in the discharge tank as well. Aluminum Precision also purchased two hand-held pH meters and stopped using pH strips for compliance confirmation in the receiving and discharge tanks. Additional corrective actions included setting an alarm in the discharge tank when the pH drops below 9.0 or raises above 10.0, and training operators to ensure they understand the changes made and the steps to follow when the pH alarms are triggered. Aluminum Precision also conducted multi-day sampling, the results of which all showed compliance.

Aluminum Precision had no further violations during this reporting period. OCSD 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.

July 1 – December 31, 2019

On **November 8, 2019**, Anchen Fairbanks had a pH violation. OCSD will issue a Notice of Violation for this noncompliance during the next reporting period.

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 February 2019, a Notice of Violation was issued for the acetone daily limit violation. In March 2019, OCSD 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, OCSD issued a Notice of Violation for the January 2019 acetone monthly limit violation. OCSD also 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. OCSD advised Anchen that the company may be required to install pretreatment equipment if the facility continues to be noncompliant. In May 2019, Anchen notified OCSD via an email that the main product line at the Goodyear facility has been transferred to Anchen's Fairbanks facility. OCSD issued another Compliance Requirements Letter directing Anchen to increase the frequency of acetone self-monitoring from semi-annual to quarterly, effective June 2019. OCSD revised Anchen's permit to reflect this increased self-monitoring frequency for acetone.

July 1 – December 31, 2019

On **December 23, 2019**, Anchen Goodyear had another acetone violation.

OCSD will issue a Notice of Violation and pursue escalated enforcement action during the next reporting period.

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.

July 1 – December 31, 2019

In **August 2019**, Anchen Jeronimo had an acetone monthly average discharge limit violation, for which a Notice of Violation was issued on **November 7, 2019**. On **December 5, 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.

OCSD will pursue escalated enforcement action during the next reporting period as a result of the continued noncompliance.

Arconic Global Fasteners & Rings, Inc. (Permit No. 1-021081)

Arconic Global Fasteners & Rings, Inc. (Arconic) 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. Arconic'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 September 2017, Arconic had a cyanide (amenable) violation. In December 2017**,** OCSD conducted a compliance inspection and routine sampling during which the sampling method/location for cyanide sampling was discussed and the cyanide treatment system was found to be adequately working. The sampling results showed compliance. In February 2018**,** Arconic sent OCSD a letter contesting the cyanide violation. After a comprehensive review, OCSD concluded that the sample result was valid, and therefore the violation was upheld.

In February 2019, Arconic had cadmium and molybdenum violations. In June 2019, OCSD conducted a Compliance Inspection and resampling, during which Arconic 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. Arconic also exceeded its cyanide (amenable) monthly average discharge limit in June 2019.

July 1 – December 31, 2019

On **August 12, 2019**, OCSD issued a Notice of Violation for the June 2019 molybdenum noncompliance. On **August 29, 2019**, OCSD conducted a Compliance Inspection during which Arconic 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. Arconic has trained its staff to clean the baskets in the molten salt bath specifically designed for that purpose.

On **September 3, 2019**, OCSD issued a Notice of Violation for the June 2019 cyanide (amenable) monthly limit violation. On **September 18, 2019**, Arconic forwarded 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.

Arconic performed voluntary self-monitoring for three days from **September 17-19, 2019**. The sampling showed molybdenum violations on the 17th and 19th, for which a Notice of Violation was issued on **October 3, 2019**. On **November 7, 2019**, OCSD issued a Compliance Requirements Letter requiring Arconic to attend a Compliance Meeting on **December 3, 2019**. During the meeting, Arconic 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. On **December 12, 2019**, Arconic submitted a letter summarizing the afore-mentioned corrective actions. On **October 21, 2019** Arconic was published as significantly non-compliant for the 2018-2019 reporting period due to chronic and acute molybdenum discharge violations that occurred on **February 20, 2019** and **June 19, 2019**.

OCSD will also continue to monitor Arconic's discharge and compliance status in the upcoming year to determine if additional enforcement is necessary.

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 OCSD 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, OCSD did not renew the permit which was expiring end of March 2019. In April and May 2019, OCSD conducted Compliance Inspections during which OCSD noted that Aseptic continued to discharge industrial wastewater to the sewer. In April 2019, OCSD 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, OCSD 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.

July 1 – December 31, 2019

On **July 11, 2019**, OCSD issued another Order to Cease Discharge Without a Valid Permit due to Aseptic's failure to make full payment of past due amounts. On **August 29, 2019**, OCSD 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, on **September 9, 2019**, OCSD issued another Order to Cease/Terminate Discharge Without a Valid Permit. Aseptic continued to discharge without a valid permit through the end of the reporting period, and therefore, OCSD will escalate enforcement during the next period.

Auto-Chlor System of Washington, Inc. (Permit No. 1-511384)

Auto-Chlor System of Washington, Inc. manufactures soaps and detergents through chemical blending operations, and conducts packaging and distribution operations from bulk quantities to smaller containers. In addition, the company provides commercial dishwashing and laundering services. Auto-Chlor operates a batch pretreatment system.

In June 2019, OCSD conducted a Compliance Inspection and observed a hard-plumbed city water connection into Auto-Chlor's batch treatment tank. Auto-Chlor stated that city water was being added to the batch tank during treatment of wastewater generated onsite to make the water level high enough for treatment.

July 1 – December 31, 2019

On **September 24, 2019**, OCSD issued a Compliance Requirements Letter requiring Auto-Chlor to take corrective actions to change the treatment operations and procedures, and prevent any dilution sources from affecting the quality of industrial wastewater discharged into the sewer. Auto-Chlor was required to submit a corrective action report by **October 15, 2019**.

OCSD will follow up on Auto-Chlor's corrective action in the next reporting period.

B. Braun Medical, Inc. (West/Lake) (Permit No. 1-541183)

B. Braun Medical, Inc. (West/Lake) (B. Braun West) manufactures pharmaceutical intravenous fluid and the packaging for the fluid. The manufacturing process includes mixing, filling, sterilization, and packaging of aqueous injectable and parenteral pharmaceutical products. The packages are sprayed and bath-sterilized before they are placed on pallets and collected for shipment. Waste from the sterilization process consists of condensate that accumulates on the packages during the cooling process, and the water drained weekly from the heat exchangers.

In October 2018, B. Braun West had a pH violation, and was issued a Notice of Violation. In December 2018, OCSD conducted a Compliance Inspection during which B. Braun West indicated that multiple sources could have contributed to the pH violation, including the shredding facility and the internal IV bag process. B. Braun West submitted a letter describing corrective actions, which included installation of a new pH adjustment system.

OCSD directed B. Braun West to complete installation of the pH adjustment system by end of January 2019, which B. Braun West failed to comply with. In April 2019, OCSD issued a Compliance Requirement Letter directing B. Braun to submit an interim compliance proposal by the end of the month and to install a temporary pH adjustment system by the end of May 2019, both of which B. Braun completed.

July 1 – December 31, 2019

OCSD directed B. Braun to submit the proposal for the permanent pretreatment system by the end of June 2019, and to complete installation by end of November 2019, both of which B. Braun completed. During previous compliance inspections at B. Braun, OCSD observed discharge of stormwater into the sewer system, which is prohibited by OCSD's Ordinance. On **July 24, 2019**, OCSD issued a Compliance Requirement Letter directing B. Braun West to propose a stormwater mitigation plan to prevent further discharge of stormwater to the sewer system. B. Braun was required to submit the proposal by **August 31, 2019** and install the proposed solution by **October 15, 2019**. B. Braun proposed to install a diverter valve that will be actuated prior to a rain event and will divert stormwater to an above ground holding tank. The contents of the tank will either be waste-hauled or discharged to the sewer system after receiving authorization from OCSD. B. Braun completed these requirements by the specified due dates. On **December 3, 2019**, OCSD conducted a follow-up Compliance Inspection and confirmed that the stormwater mitigation system and the new permanent pretreatment system were operational and appeared to be properly maintained.

OCSD will continue to monitor B. Braun West's discharge and compliance status on a quarterly basis.

Beo-Mag Plating (Permit No. 1- 511370)

Beo-Mag Plating (Beo-Mag) performs surface finishing on customer supplied parts made from aluminum, mild steel, and die-cast zinc. Beo-mag is a metal finishing job shop specializing in decorative chrome and gold plating. The restoration of motorcycle and classic automobile parts accounts for approximately 80% of their business, and the remaining percentage consists of small volume commercial work such as bathroom fixtures and other assorted parts. The processing of a steel or die-cast zinc part includes polishing, electrocleaning, cyanide copper strike, acid copper plating, manual buffing, alkaline cleaning to remove the buffing residue, nickel plating, and finally chrome plating. The chrome plating of a typical aluminum part proceeds by polishing, alkaline cleaning, Aluma acid etch, deoxidation, zincate, copper plating, buffing, alkaline cleaning to remove the buffing residue, nickel plating, and finally chrome plating. All wet operations are conducted manually using typical rack and wire plating techniques. The effluent discharge at Beo-Mag is generated by aqueous fume scrubbing, various spent process solutions, and the associated rinse wastestreams.

In January 2019, Beo-Mag had cyanide (total) daily and monthly average discharge limit violations and was issued Notices of Violation accordingly. In March 2019, OCSD conducted a Compliance Inspection and noted that corrective actions had been implemented by the facility to address the cyanide issue.

July 1 – December 31, 2019

Beo-Mag submitted its permit renewal application on **November 6, 2019**, which was six days past the extended due date of **October 31, 2 019**. Hence, on **November 18, 2019**, OCSD issued a letter informing Beo-Mag that a $500 fee will be assessed for late submittal of the permit application, in accordance with OCSD's Ordinance No. 51.

Beo-Mag had no further discharge violations during this reporting period. OCSD will continue to monitor Beo-Mag's discharge and compliance status on a quarterly basis.

Bodycote Thermal Processing (permit No. 1-031120)

Bodycote Thermal Processing (Bodycote) performs oven and furnace operation, metal brazing, quenching, freezing, and metal heat treating. The parts are either placed in the ovens to be aged, or treated with sodium nitrate, glycol and hot/cold water. After these first main steps, parts are either placed in the freezer (for customer pickup), or straightened/molded in the shop area. Wastewater is generated from the treatment rinse tank line, or the quench tank overflow. Bodycote has large quench tanks or sumps where the parts are submerged to be quenched. Any overflow from these quench tanks is routed to the water/glycol separation tanks where glycol is separated from water to be recycled back into the tanks. After the separation process, wastewater is routed through a settling box to remove solids before being discharged to the sewer.

June 1 – December 31, 2019

On **October 30, 2019**, Bodycote had a molybdenum violation for which a Notice of Violation was issued on **November 22, 2019**. A Compliance Inspection was conducted on **December 10, 2019**. During the inspection, Bodycote indicated that no source for the violation was identified. Bodycote was directed to conduct informational sampling from their rinses and quench tanks to investigate the cause of violation. The results showed only low concentrations of molybdenum in the tanks. The cause of violation seems to be excessive solid settlement in the settling box which lead to carry over into the sample box. Bodycote had performed voluntary sampling in December 2019, and OCSD performed a resampling on December 19, 2019 with compliant results. In the next reporting period, OCSD will amend Bodycote's permit to add molybdenum self-monitoring requirements, and a requirement to clean out both settling and sample boxes on a weekly basis.

OCSD will continue to monitor Bodycote's discharge and compliance status on a quarterly basis.

Brea Power II, LLC (Permit No. 1-521837)

Brea Power II, LLC (Brea Power) produces electricity from landfill gas extracted from the adjacent landfill, firing the gas in boilers to produce steam for use in turbines and the production of electricity. Wastewater is generated from a combination of cooling tower blow down, boiler blow down, and landfill gas condensate (LFG). Pretreatment on site includes a caustic dosage to the LFG to raise the pH within the range of 6.0-12.0. Hydrogen Peroxide is also injected downstream at the oily water separator on-site to minimize sulfide generation. A chemical mix is also injected downstream of the sample point to control hydrogen sulfide generation in OCSD's sewer system.

July 1 – December 31, 2019

On **July 31, 2019**, Brea Power had a pH violation, for which a Notice of Violation was issued on **August 12, 2019**. On **August 27, 2019**, OCSD conducted a Compliance Inspection during which Brea Power indicated that the source of the pH violation was due to a pH electrode failure. On **August 28, 2019**, Brea Power submitted a corrective action report stating that the pH electrode had been replaced. The resampling result showed compliance.

OCSD will continue to monitor Brea Power's discharge and compliance status on a quarterly basis.

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.

In 2017, Bristol completed construction of a new building to house new process and rinse tanks that would eventually replace all their aging tanks. Bristol also completed installation of a new state-of-the-art pretreatment system which was intended to replace their existing one. The new system consists of a continuous ion exchange (IX) system for heavy metals removal, and batch treatment for IX regeneration waste, chrome reduction, and cyanide destruction. The new IX system allows Bristol to recycle most of their rinses and thus save water.

In June and July 2017, Bristol had cyanide (amenable) violations. In August 2017, Bristol had a cadmium violation. Bristol submitted a root cause analysis and corrective action report for the cyanide violations. The report attributed the violations to inadequate retention time due to high production and high flow rate during those two days, aggravated by low oxidation reduction potential (ORP) in stage 1 and high ORP in stage 2, thus causing incomplete destruction of cyanide. Bristol's corrective actions consisted of adjusting the ORP and pH in both stage 1 and stage 2 during heavy production days to ensure complete treatment of cyanide. Bristol conducted multi-day sampling to confirm the efficiency of their modifications / corrective actions and the test results all showed compliance.

In September 2017, OCSD conducted a compliance inspection and resampling, during which Bristol indicated that the pretreatment system operators had been trained on the proper pH and ORP settings for treatment of the cyanide-bearing wastestreams. However, the resampling results detected a nickel violation. Bristol submitted another root cause analysis and corrective action report to address the August 2017 cadmium violation. During the investigation, Bristol staff discovered that the blade in the batch treatment tank was not connected to the mixer shaft, and therefore no mixing was occurring in the batch tank. The mixer blade detached due to loosened fasteners. Bristol immediately fixed the problem and conducted resampling for cadmium. The resampling results showed compliance.

In October 2017, OCSD conducted resampling for nickel and the results showed compliance. Bristol submitted a third root cause analysis and corrective action report to address the nickel violation. The report cited inadequate pH and ORP setpoints as the cause of the violation. Corrective actions consisted of increasing the pH, reducing the ORP, and conducting in-house testing of each treated batch for compliance before discharging the effluent to the sewer.

In April 2018, Bristol had another cyanide (amenable) violation. In June 2018, OCSD conducted another compliance inspection, during which Bristol submitted another root cause analysis and corrective action report to address the violation. The report identified the source of the cyanide amenable violation to several

operational issues and issues with ORP probes. Corrective actions consisted of weekly calibration of the ORP probes, maintenance of calibration record logs, updating of treatment unit operating instructions to include calibration frequency, additional operator training, and additional team leader verification for probe check and record-keeping.

In September 2018, Bristol had another cyanide violation. In October 2018, OCSD issued an Order to Cease Noncompliant Discharges and held a Compliance Meeting with Bristol, during which the company attributed the source of the cyanide violation to an overflow situation at the cyanide treatment unit. In November 2018, OCSD issued a Compliance Requirements Letter directing Bristol to submit a pretreatment system evaluation and proposal for improvements. Bristol's proposed improvements included installation of an equalization tank in the cyanide treatment unit to provide adequate treatment capacity.

In December 2018, Bristol had another cadmium daily discharge limit violation and a monthly cadmium mass limit violation, as well as another cyanide violation. Bristol submitted a root cause analysis and corrective action report to address the violations. The report identified the resin beds in the metal scavenger resin system for the cyanide treatment as the source of the cadmium violation. Bristol indicated that the resin beds were found to be fouling with a precipitant, which caused channeling in the resin beds allowing treated cyanide wastewater to travel through the beds with little to no contact with the resins for metal removal. Corrective actions consist of resin bed rotation and changes based on the analysis of effluent from cyanide and the metal scavenger system sample point.

In January 2019, Bristol had cadmium, cyanide (amenable and total), and silver daily and monthly average discharge limit violations. In February 2019, Bristol had further cadmium, silver, and pH violations. In March 2019, Bristol had further cadmium daily and monthly average discharge limit violations.

OCSD issued several Notices of Violation for the aforementioned violations between February and April 2019. In March 2019, OCSD also issued a Second Order to Cease Noncompliant Discharges in response to the recurring violations and repeated pretreatment system failure on site. In April 2019, OCSD held a second Compliance Meeting during which OCSD informed Bristol of the agency's determination that the recent compliance issues were caused by inadequate hydraulic capacity of Bristol's existing pretreatment system, lack of process control of the pretreatment equipment, disconnect between the upstream production processes and the pretreatment system processes, and the lack of a complete facility wastewater process review to correct the earlier violations. OCSD also informed Bristol of its intention to issue an Administrative Complaint and provided Bristol the option to enter into a Settlement Agreement and an Enforcement and Compliance Schedule Agreement with OCSD, in lieu of an Administrative Complaint, to settle the violations that occurred from June 2017 through March 2019.

In June 2019, Bristol had further cyanide (total), cadmium, silver, and pH violations. That month, OCSD issued a Notice of Violation for the March 2019 cadmium and silver monthly mass limit violations.

In general, OCSD has conducted multiple inspections at the facility during previous reporting periods and found that Bristol continues to experience pretreatment system failure and operational control issues onsite. Additionally, OCSD found that Bristol continued to make several process modifications onsite without prior notification to OCSD.

<u>July 1 – December 31, 2019</u>

On **July 1, 2019**, OCSD issued a Notice of Violation for the April 2019 silver monthly mass limit violation. On **July 11, 2019**, Bristol had further cadmium, nickel and silver violations. On **July 17, 2019**, OCSD issued a Third Order to Cease Noncompliant Discharges in response to the continued pretreatment system failure, operational issues, and recurring violations. On **August 12, 2019**, OCSD issued Notices of Violation for the June 2019 cyanide, cadmium, pH, and silver violations, as well as for the July 2019 cadmium, nickel and silver violations.

On **August 13, 2019**, OCSD held a third Compliance Meeting during which OCSD instructed Bristol to conduct a complete process study to evaluate the adequacy of the existing pretreatment system and then

develop a plan to ensure compliance with the permit limits. OCSD informed Bristol that the company has repeatedly approached corrective actions in a piece-meal fashion which has caused additional permit violations and equipment issues. OCSD reiterated that a comprehensive evaluation of the facility is required to prevent continued non-compliance.

The Settlement Agreement was issued on **May 29, 2019** and became effective on **August 8, 2019**. On **September 12, 2019**, OCSD issued the Enforcement and Compliance Schedule Agreement (ECSA) to Bristol. As required in the Settlement Agreement, Bristol continued to complete the ECSA requirements in a timely manner. Where more time was needed to complete further analysis, OCSD provided extensions to the schedule. However, during this ECSA period, Bristol continued to experience violations of mass emission rate limits. On **September 6, 2019**, Bristol had a silver mass violation. O**n October 29, 2019**, Bristol had cyanide (amenable and total) mass limit violations. The Notices of Violation for these two mass violations will be issued in the next reporting period. On **November 14, 2019**, and **November 20, 2019**, Bristol had cadmium mass violations.

On **November 27, 2019,** Bristol had a cadmium violation.

On **November 30, 2019**, Bristol submitted their pretreatment system modification proposal. OCSD had concerns with the proposal pertaining to the volume of wastewater discharged to the cyanide system, segregation of the cyanide-related backwashes, and failure mode analysis of the new system.

On **December 4, 2019**, Bristol had another cadmium violation. On **December 12, 2019**, Bristol had further cadmium violation plus a cyanide (amenable) violation. On **December 27, 2019**, Bristol had a cyanide (total) violation.

On **December 30, 2019**, OCSD issued a Notice of Violation for the November 2019 cadmium mass violations. The Notices of Violation for the other exceedances will be issued in the next reporting period.

On **October 21, 2019** Bristol was published as significantly non-compliant for the 2018-2019 reporting period due to acute Cadmium discharge violations on **December 6, 2018**, **January 8, 2019**, **February 5, 2019**, and **March 26, 2019**, as well as an acute CN discharge violation on **August 3, 2018**.

OCSD will hold another Compliance Meeting with Bristol in the next reporting period to discuss OCSD's concerns with the company's pretreatment system modification proposal and their recent and ongoing violations.

Brothers International Desserts (North) (Permit No. 1-600583)

Brothers International Desserts (Brothers North) is an ice-cream and frozen novelty manufacturer. Most of the wastewater is generated by the cleaning and sanitizing of equipment used for the manufacturing processes.

July 1 – December 31, 2019

On **September 9, 2019**, Brothers North had a pH violation, for which a Notice of Violation was issued on **October 14, 2019**. Prior to this violation, Brothers North had already informed OCSD of their intention to install a new pH adjustment system on-site due to another pH violation for their other clarifier (issued under separate Permit No. 1-600582 for Brothers North).

OCSD will conduct a follow-up Compliance Inspection during the next reporting period to determine Brothers North's progress and compliance status.

Brothers International Desserts (West) (Permit No. 1-600582)

Brothers International Desserts (Brothers West) is an ice-cream and frozen novelty manufacturer. Most of the wastewater is generated by the cleaning and sanitizing of equipment used for the manufacturing processes.

In June 2019, Brothers had pH violations.

July 1 – December 31, 2019

On **July 10, 2019**, OCSD issued a Notice of Violation for the previous month's pH violations. On **August 5, 2019**, OCSD conducted a Compliance Inspection during which Brothers West indicated that the clarifier was not pumped out according to the company's agreed schedule, and the long retention and ensuing fermentation of accumulated solids in the clarifier caused the pH violations. OCSD reminded Brothers West that the company may be required to install pre-treatment equipment if their facility discharges continue to be non-compliant. On **August 13, 2019**, Brothers West submitted their corrective action to address the pH violation. Corrective actions included maintaining the clarifier frequently and the installation of a pH adjustment system on-site.

OCSD will conduct a follow-up Compliance Inspection during the next reporting period to determine Brothers West's progress and compliance status.

Cadillac Plating, Inc. (Permit No. 1-021062)

Cadillac Plating, Inc. (Cadillac) is a job shop metal finishing facility. Wastewater-generating processes include alkaline and acid chloride zinc plating, bright tin plating, bright nickel plating, sulfuric anodizing, alkaline cleaning, acid activation, chromate conversion coating, chemfilm, and associated rinses. The facility engages in rack plating only. The facility operates a continuous hydroxide pretreatment system that consists of pH adjustment, chrome reduction, flocculent addition, clarification, and sludge dewatering with a filter press. Spent solutions are treated in a batch pretreatment system, with the effluent routed through the continuous pretreatment system for further treatment.

In January 2017, OCSD conducted a compliance inspection during which numerous pretreatment system deficiencies and violations were found. OCSD issued an Order to Cease Noncompliant Discharges to Cadillac followed by a compliance meeting and issuance of a Probation Order in February 2017. In March 2017, OCSD conducted a joint probation search with representatives from the Orange County District Attorney's office, Occupational Safety & Health Administration (OSHA), and Orange County Health Care Agency (OCHCA). As a result of numerous safety violations, OSHA issued an Order Prohibiting Use (OPU). Through 2017 and 208, OCSD conducted inspections to confirm the completion of the requirements from the Probation Order. The continuous pretreatment system was found to be operating in a safe and controlled manner with no indication of overflow, short-circuiting, or slug loading. The batch treatment system was operational as well and appeared to be properly maintained. Log sheets for the batch treatment system were being kept on site and were up to date.

In October 2018, Cadillac had a zinc violation. In December 2018**,** OCSD conducted a Compliance Inspection during which multiple deficiencies were noted including missing or illegible process tank labels, a lack of pretreatment system vessel structural integrity that could lead to treatment bypass, and unidentified noncompliant wastewater. OCSD also noted that that one of the pretreatment operators failed to obtain qualified treatment operator certification as required by the Probation Order. Additionally, Cadillac had failed to provide a wastewater characterization for the processing lines prior to using them.

In April 2019, OCSD issued a Compliance Requirements Letter to address the deficiencies noted during the last reporting period. Shortly thereafter, OCSD conducted a follow-up Compliance Inspection and observed further noncompliance issues including pH probes out of calibration; lack of an automated pH adjustment system and final pH chart recorder; prohibited use of flexible hosing; and process line modifications

implemented without written notification to OCSD. In mid-April 2019, OCSD issued an Order to Cease Noncompliant Discharges directing Cadillac to attend a Compliance Meeting later that month. In May 2019, OCSD issued a second Compliance Requirements Letter requiring Cadillac to correct the noncompliance issues and deficiencies by the end of the month, as discussed during the compliance meeting. In early June 2019, OCSD conducted another Compliance Inspection and found remaining deficiencies. During a follow-up inspection later that month, OCSD confirmed that Cadillac had finally completed all requirements. However, OCSD routine sampling in June 2019 detected a nickel violation.

July 1 – December 31, 2019

On **August 12, 2019**, a Notice of Violation was issued for the nickel exceedance that occurred the previous month. On **August 29, 2019,** OCSD conducted a Compliance Inspection during which multiple deficiencies were noted including an uncalibrated pH meter, unqualified operators operating the pretreatment system, process changes without written notification to OCSD, and a loss of process control due to pretreatment system capacity issues. As a result of these pretreatment deficiencies, on **September 24, 2019**, OCSD issued a letter directing Cadillac to attend a Compliance Meeting on **October 15, 2019**. On **October 18, 2019**, as a follow-up to the compliance meeting, OCSD issued a Compliance Requirements Letter requiring Cadillac to maintain a certified wastewater treatment operator at all times during wastewater discharge, conduct testing on all treated batches of wastewater and maintain a log of those batches, maintain the pH chart recorder, and record maintenance activities related to the excessive build-up of flocculant in pretreatment system lines. On **November 21, 2019**, OCSD conducted another Compliance Inspection during which OCSD confirmed completion of the compliance requirements.

OCSD will continue to monitor Cadillac's discharge and compliance status on a quarterly basis.

Cargill, Inc. (Permit No.1-031060)

Cargill, Inc. (Cargill) is a bulk loading station with facilities for storage and packaging of vegetable and animal oils. Wastewater is generated by steam cleaning of packaging equipment and washdown of loading, processing and packaging areas (with some boiler blowdown). Pretreatment at the facility consists of a skim basin followed by clarification for the removal of oil and fat.

July 1 – December 31, 2019

On **September 24, 2019**, OCSD issued an Order to Cease Noncompliant Discharges to Cargill for discharging wastewater which caused blockages downstream of the facility in the City of Fullerton. The Order required Cargill to attend a Compliance Meeting to resolve the matter on **October 24, 2019**. During the meeting the excessive discharge of oil and grease (total) (O&G-T) was discussed along with sewer discharge of surface runoff, which is also prohibited. On **October 31, 2019**, OCSD issued a Compliance Requirements Letter requiring Cargill to conduct monthly self-monitoring for total oil & grease, re-evaluate the pretreatment system at the facility, propose improvements to ensure adequate oil & grease removal, and develop a stormwater mitigation plan to divert stormwater from sewer discharge.

OCSD will follow up on Cargill's compliance progress and deliverables during the next reporting period.

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, OCSD conducted a Compliance Inspection during which OCSD 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. OCSD 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, OCSD issued a Notice of Violation and conducted another Compliance Inspection to reiterate concerns about Catalina Cylinders' noncompliance with the oil & grease mass emission limits.

July 1 – December 31, 2019

On **October 10, 2019**, OCSD issued a Compliance Summary Letter requiring Catalina Cylinders to conduct multi-day self-monitoring in October 2019. The multi-day self-monitoring was performed on **October 22-24, 2019** and the results showed in compliance with their oil & grease mass emission limits.

On **October 21, 2019** Catalina Cylinders was published as significantly non-compliant for the 2018-2019 reporting period due to acute oil & grease of mineral or petroleum origin discharge violations on **January 4, 2019** and **April 1, 2019**.

OCSD will continue to monitor Catalina Cylinders discharge and compliance status in the upcoming year to determine if additional enforcement is necessary.

City of Huntington Beach Fire Department (Permit No. 1-111015)

City of Huntington Beach Fire Department (HB Fire) operates three oil extraction wells. The extracted crude oil and groundwater mixture is routed to an oil/water separation tank. Crude oil is shipped offsite while the separated wastewater is routed through an aboveground clarifier prior to discharge to the sewer.

In April 2019, HB Fire had an oil & grease of mineral or petroleum origin violation and was issued a Notice of Violation. In May 2019, HB Fire reported that the violation was due to a build-up of oil and grease in the sample port and failure of the operator to flush the port prior to sampling. In June 2019, HB Fire informed OCSD through an email that they had installed a third stage for the clarifier and a separate sample box as a corrective measure.

July 1 – December 31, 2019

On **July 1, 2019**, OCSD conducted a Compliance Inspection to confirm completion of corrective actions as a result of the violation that occurred in the prior quarter. HB Fire had no further violations during this reporting period.

OCSD will continue to monitor HB Fire's discharge and compliance status on a quarterly basis.

City of Newport Beach, General Services

The City of Newport Beach operates a general services yard, which houses several areas for various municipal operations and vehicle maintenance. This yard also serves as a location where vacuum-truck vehicles can unload decant wastewater generated during the cleaning of both city sewer and stormwater piping.

During an inspection in February 2017, OCSD discovered that several areas within the yard which receive stormwater flow had a direct connection to OCSD's Sewer Trunkline. Therefore, OCSD issued a Compliance Requirements Letter directing the City of Newport Beach to divert stormwater away from OCSD's sewerage facilities. Following a series of correspondence and inspections, the City of Newport Beach plugged and rerouted several areas to prevent stormwater from entering the sewer system. Additionally, the City of Newport Beach installed a rainwater diversion valve to divert stormwater from the upper areas, and a Fresno Sluice Gate in the sewer/stormwater decanting area so it will remain closed during the winter months.

July 1 – December 31, 2019

On **November 27, 2019**, OCSD conducted a Compliance Inspection during a storm event and observed that the rainwater diversion switch that redirects stormwater from the upper yard was not set properly; it did not remain in the "ON" mode after the rain subsided which allowed for additional sheet flow to discharge to the sewer. In addition, OCSD observed City yard workers opening the sluice gate in the decanting area, allowing the collected stormwater and vacuum truck water to be released to the sewer during the storm event.

OCSD will issue a Compliance Requirements Letter during the next quarter to address the observed stormwater issues.

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 liquor 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.

July 1 – December 31, 2019

On **October 2, 2019**, Coast had a pH violation, for which a Notice of Violation was issued on **October 21, 2019**. In a previous inspection, OCSD 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. On **October 28, 2019**, OCSD issued a Compliance Requirements Letter requiring Coast to address the compliance deficiencies by **November 30, 2019**. On **November 12, 2019**, OCSD conducted a Compliance Inspection to verify the status of compliance requirements. Unaware of the letter, Coast requested and was granted an extension to complete the compliance requirements during the next quarter.

OCSD will continue to monitor Coast's discharge and compliance status on a quarterly basis.

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 system.

July 1 – December 31, 2019

On **September 12, 2019**, Corru-Kraft had a pH violation, for which a Notice of Violation was issued on **October 28, 2019**. On **November 14, 2019**, OCSD conducted a Compliance Inspection and resampling, during which OCSD identified that pH treatment may be required to ensure consistent compliance. It was determined that the wastewater enters the clarifier with a pH of approximately 11.5 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 by the final stage of the clarifier. As a corrective action measure, Corru-Kraft plans to determine if more frequent clarifier cleaning will maintain pH compliance or if a pretreatment system will be required. OCSD will continue its enforcement response during the next reporting period.

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

CP-Carrillo, Inc. (Armstrong) (CP Armstrong) manufactures aluminum pistons for the automotive industry, conducting mainly aluminum anodizing and graphite skirt coating. CP Armstrong anodizes the ring groove on aluminum pistons into aluminum oxide 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.

July 1 – December 31, 2019

On **October 25, 2019**, CP Armstrong had a pH violation, for which a Notice of Violation was issued on **December 10, 2019**. OCSD will conduct a Compliance Inspection during the next reporting period.

Darling International, Inc (Permit No. 1-511378)

Darling International, Inc. (Darling) collects and treats waste from interceptors, clarifiers, and grease traps of food service establishments within the Southern California Region. Hauled waste is transported to the facility yard, unloaded to a large underground sump, then pumped to aboveground batch treatment tanks where it is treated with lime and polymer to enhance separation of solids and liquids. The sludge is dewatered and allowed to air dry in large rectangular vessels. The treated wastewater is collected and discharged to the sewer. The wastewater discharge permit authorizes Darling to discharge wastewater from the treatment of grease trap waste from restaurants, cafeterias, or other similar facilities, but not yellow grease or cooking oil. In addition, processing of grease from industrial kitchens, car washing facilities, metal recycling yards, or other sources of industrial or hazardous wastes is prohibited. Any generator sources outside of OCSD's service area must have a profile submitted in advance to OCSD for review and acceptance.

In August 2018, Darling had a pH violation. In November 2018, OCSD conducted a Compliance Inspection during which Darling stated that pH monitoring is achieved through the use of pH strips at various points in the process including the wastewater collection sump. However, no pH logs were kept. OCSD attributed the pH violation to the inconsistent and unreliable manual pH adjustment process and inadequate monitoring utilizing pH strips. In addition, some pH fluctuation is attributable to the organic nature of the waste. OCSD required installation of a pH meter and a pH recorder, as well as operator training.

In June 2019, Darling had another pH violation.

July 1 – December 31, 2019

On **July 9, 2019**, a Notice of Violation was issued for the previous month's pH noncompliance. On **July 18, 2019**, OCSD conducted a Compliance Inspection to follow up on the ongoing pH violations. As a result of the recurring noncompliance with pH limits due to the lack of an effective pH adjustment and control system at Darling's facility, OCSD issued a Compliance Requirements Letter on **August 12, 2019**, requiring the submittal of a waste management proposal by **September 15, 2019**, and after acceptance by OCSD, for Darling to complete installation of the proposed pretreatment system by **October 31, 2019**. On **September 13, 2019**, Darling submitted a proposal to install a pH adjustment system in an existing tank upstream of the clarifying tanks. On **October 2, 2019**, OCSD accepted the proposal with revisions, which included the installation of a pH adjustment system, pH monitoring system, and a rain diversion sensor to prevent the discharge of storm water into the sewer. Darling completed installation of the pH adjustment system on **October 30, 2019**.

OCSD will continue to monitor Darling's discharge and compliance status on a quarterly basis.

Data Aire, Inc. #2 (Permit No. 1-021379)

Data Aire, Inc. #2 (Data Aire) receives cold rolled steel and manufactures frames to house cooling equipment. Steel is sheared, bent, punched, welded, and assembled into frames. An iron phosphate conversion coating is applied to the frame prior to powdercoating and baking. Some parts may alternately undergo painting in a spray booth. The components for the cooling systems, which include electrical equipment and heat exchanging coils, are purchased from other companies and not manufactured on site. Approximately 300-400 parts are cleaned per day. The heat exchange coils are made of copper tubing and aluminum fins and undergo hydrostatic leak testing as part of the production process. Wastewater is generated from the rinsing of frames during the application of iron phosphate conversion coating. The wastewater is pH adjusted based on the iron phosphate conversion floating flow rate and then discharged through a clarifier to the sewer.

July 1 – December 31, 2019

On **July 25 and 26, 2019**, Data-Aire had pH violations for which a Notice of Violation was issued on **August 8, 2019**. On **September 9, 2019**, OCSD conducted a Compliance Inspection to investigate the violations. In previous inspections, OCSD noted that the treatment system lacked pH monitoring and only relied on a controller that doses caustic to the wastewater based on the flow of iron phosphate (ratio control). OCSD reminded Data Aire of its responsibility to maintain compliance at all times of wastewater discharge, indicating that pH must be monitored continuously. On **September 29, 2019**, Data Aire submitted a proposal to install a pH monitoring system with high and low alarms and digital data logging. OCSD accepted the proposal with an expected work completion date of **October 31, 2019**. On **November 18, 2019**, OCSD conducted a follow-up inspection and verified installation of the pH monitoring system.

OCSD will continue to monitor Data-Aire's discharge and compliance status on a quarterly basis.

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.

July 1 – December 31, 2019

On **November 6, 2019**, OCSD 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 any ground

water (including stormwater) is collected, treated, and discharged to the sewer. OCSD informed DCOR that stormwater is prohibited from being discharged to the sewer in accordance with OCSD's Ordinance. On **December 30, 2019**, OCSD 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, submit the proposal to OCSD and after acceptance, complete implementation of the accepted proposal by next quarter.

OCSD will evaluate DCOR's proposal and compliance status 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, OCSD conducted a Compliance Inspection and resampling during which OCSD 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. The resampling result showed another pH violation.

In March 2019, OCSD 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.

July 1 – December 31, 2019

On **August 21, 2019**, Dr. Smoothie had another pH violation, for which a Notice of Violation was issued on **September 12, 2019**. On **October 7, 2019**, OCSD issued a Compliance Requirements Letter to Dr. Smoothie requiring them to attend a Compliance Meeting on **October 30, 2019**. During the meeting, Dr. Smoothie indicated that they are continuing manual pH adjustment. With the ongoing pH violations, Dr. Smoothie proposed installation of an automated pretreatment system similar to equipment utilized at another company facility.

OCSD will continue to monitor Dr. Smoothie's discharge and compliance status on a quarterly basis and conduct a Compliance Inspection in the upcoming quarter to verify progress of the pH adjustment system installation.

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.

July 1 – December 31, 2019

On **August 28, 2019**, Electrolurgy had a silver violation. This daily limit exceedance also resulted in a monthly average discharge limit violation for silver for the month of August 2019. On **October 9, 2019**, OCSD

conducted a Compliance Inspection during which OCSD informed Electrolurgy of the silver violation that was being processed by OCSD for issuance. On **October 14, 2019**, OCSD issued a Notice of Violation for the August 2019 silver daily limit violation. **October 17, 2019**, OCSD issued a Compliance Requirements Letter requiring Electrolurgy to implement corrective solutions to address the observed non-compliance issues at the facility by **November 30, 2019**. On **November 7, 2019**, OCSD issued a Notice of Violation for the August 2019 silver monthly limit violation. On **November 14, 2019**, OCSD received Electrolurgy' s response to the silver violation, which failed to identify the source of the non-compliance. On **December 2, 2019**, OCSD received Electrolurgy' s response to OCSD's October 2019 Compliance Requirements Letter, which also failed to satisfy OCSD's requirements.

OCSD will pursue escalated enforcement action during the next reporting period.

Gemini Industries, Inc. (Permit No. 1-071172)

Gemini Industries, Inc. (Gemini) provides precious metals recovery and refining services for the petrochemical and petroleum refining industries. The facility is a large wet processing operation that specializes in the recovery of platinum, palladium, rhenium, germanium, and gold from spent chemical catalysts. Gemini's wet processes yield purified precious metals, refinable metal residue, and aluminum sulfate solution, sold as alum for municipal water and wastewater treatment.

The recovery of precious metals at Gemini begins with spent catalyst from various customers which arrive in 55-gallon steel drums or flow bins. The catalyst is fed to a sampling system to determine specific constituent concentrations as well as the potential precious metals yield. Processing the spent catalyst begins with sulfuric acid digestion, generating a hot slurry which is pumped to mixing and settling tanks. The liquid decant is filtered through various filtration devices while the solids are wasted, dewatered, and dried. Pure palladium or other precious metals are recovered from the solids while the liquid undergoes further precious metals recovery. Spent rhenium catalyst processing follows a similar procedure aimed at the recovery of rhenium as ammonium perrhenate salts. The effluent discharge at Gemini is generated by decant liquids from the final metal precipitation and recovery process.

July 1 – December 31, 2019

On **November 6, 2019**, Gemini had a Molybdenum violation, for which a Notice of Violation was issued on **December 12, 2019**. OCSD will conduct a Compliance Inspection during the next quarter.

Hanson-Loran (Permit No. 1-031107)

Hanson-Loran 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 Hanson-Loran'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. Hanson-Loran's treatment system consists of an underground three-stage clarifier with manual pH adjustment using pH strips and addition of granulated citric acid.

In October 2017, Hanson-Loran had pH violations. In November 2017, OCSD conducted a compliance inspection and resampling, during which OCSD noted that the treatment system lacked adequate control. Hence, OCSD advised Hanson-Loran to take corrective measures to prevent further pH noncompliance. Hanson-Loran installed an automated pH control system to prevent further pH violations. The resampling result showed compliance. In 2018, Hanson-Loran installed a second probe to verify the pH following adjustment in the clarifier.

In March 2019, Hanson-Loran had another pH violation. In April 2019, OCSD conducted a Compliance Inspection during which it was determined that the pH adjustment system's set points were not adequately

set; therefore, the system was over-dosing caustic to the clarifier. The pretreatment system operators were also manually adding citric acid to the final stage of the clarifier prior to the sample point in an attempt to reduce the pH. However, due to lack of proper mixing of the chemical, a layer of citric acid had developed at the bottom of the clarifier.

In April and May 2019, Hanson-Loran had additional pH violations. In June 2019, OCSD issued a letter requiring Hanson-Loran to attend a Compliance Meeting.

July 1 – December 31, 2019

On **July 3, 2019**, OCSD held a Compliance Meeting with Hanson-Loran during which the company re-iterated that improper set points of the clarifier pH adjustment system led to operators manually adding citric acid to the final stage of the clarifier in order to reduce the pH. This caused a layer of citric acid to develop in the clarifier, which in turn caused the pH violation.

On **July 22, 2019**, OCSD issued a Compliance Requirements Letter requiring Hanson-Loran to propose and install an automatic batch pH adjustment system outside of the clarifier with an automatic chemical feed, a mixer, an automatic shutoff valve, and a 24-hour continuous pH chart recorder. Hanson Loran was also required to determine the dimensions and volume/capacity of the clarifier to ensure the sample point was adequately representative, and sampled wastewater was not retained past the sample date.

On **November 13, 2019**, OCSD conducted a Compliance Inspection to review the progress of the installation and to review a proposed amendment to the previously accepted plan. The plan included routing all wastewater to the first stage of the clarifier and then to the automatic pH adjustment batch tank to avoid re-plumbing costs and also reduce pump demand. OCSD accepted the amendment on **December 5, 2019**.

OCSD will verify the completed installation of the automatic batch pH adjustment system in the next reporting period and continue to monitor Hanson-Loran's discharge and compliance status on a quarterly basis.

Harbor Truck Bodies, Inc. (Permit No. 1-021286)

Harbor Truck Bodies, Inc. (Harbor Truck) manufactures utility bodies, platform beds, toolboxes, and rear step-bumpers. The effluent discharge at Harbor Truck is generated from the soap cleaning and phosphate washing processes as well as rinsing in the spray booth. Wash water is collected in a large trench and a sump system installed in the wash chamber floor. From the sump, the wash water is pumped by liquid level control to a three stage pretreatment system on the west side of the facility, where pH is adjusted in the first stage using caustic, followed by polymer/floc addition for solids precipitation in the second stage, and then overflow into a collection/solids settling tank. Wastewater is discharged by gravity out of the building to a three stage underground clarifier. Harbor Truck uses a filter press for dewatering of solids from the settling tank.

In April 2019, Harbor Truck had a zinc monthly average discharge limit violation. In June 2019, OCSD conducted a pre-permit inspection during which OCSD informed Harbor Truck of the zinc monthly limit violation. During the inspection, Harbor Truck stated that the root cause of the zinc exceedance was a lack of regular maintenance of the clarifier.

July 1 – December 31, 2019

On **July 1, 2019**, OCSD issued a Notice of Violation for the April 2019 zinc monthly limit violation. On **August 2, 2019**, Harbor Truck submitted a corrective action report indicating that the clarifier will be maintained on a quarterly basis. This corrective action was also added as a requirement on Harbor's permit as a special condition.

OCSD will continue to monitor Harbor Truck'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 continuous hydroxide precipitation pretreatment system.

July 1 – December 31, 2019

In **October 2019**, Hi Tech Solder had a copper monthly average discharge limit violation. OCSD will issue a Notice of Violation for this limit exceedance during the next reporting period.

Hightower Plating & Manufacturing Co. (Permit No. 1-021185)

Hightower Plating & Manufacturing Co. (Hightower) manufactures aerospace-quality washers by stamping steel, stainless steel, and aluminum coils. The parts are deburred and then processed through a variety of metal finishing steps depending on the material, to achieve the desired finish. Hightower's metal finishing operations include alkaline cleaning, acid activation, chromic and sulfuric anodizing, cadmium plating, acid zinc plating, nickel plating, caustic etching, deoxidation, chem film, dichromate sealing, and passivation.

Low concentration waste streams are treated using two ion exchange systems - one for cyanide bearing waste streams and one for non-cyanide bearing waste streams. The treated water is returned to the process tanks for reuse. The regenerant wastes from both ion exchange systems are processed through an evaporator. Concentrated wastes (including but not limited to chromic acid from the anodizing tanks) are wastehauled off-site. A small number of waste streams from the sulfuric anodize and chem film lines are sent to a chromium collection tank and then treated using the chromium reduction system.

In May 2019, Hightower had cadmium concentration and mass violations. In a response letter submitted in June 2019, Hightower stated that its investigation failed to identify a root cause, as no changes to its wastewater generating and treatment activities have occurred, and confirmation sampling conducted by Hightower in May and June 2019 showed compliance with the cadmium limits. Hightower had their split sample analyzed and it yielded a lower result but still in exceedance of the cadmium limit.

July 1 – December 31, 2019

On **July 11, 2019**, OCSD conducted a Compliance Inspection to investigate the cadmium violations that occurred in May 2019. Hightower has been in the process of transitioning from using cyanide destruct and chromium reductions systems to treating ion exchange regenerant with an evaporator. During this transition, some of the cadmium bearing regenerant may have been treated unsuccessfully using the cyanide destruct system.

In a follow-up letter submitted in July 2019, Hightower stated that the site would be sending cadmium ion exchange regenerant to the wastewater evaporator under normal conditions in an effort to eliminate the reoccurrence of a cadmium violation.

OCSD required Hightower to develop and submit updated site drawings and reminded Hightower that the permittee is required to provide advance written notification to OCSD of any changes to the manufacturing process or pretreatment system that affects the quantity or quality of the wastewater discharged to the sewer. Hightower submitted updated facility drawings on **October 1, 2019**.

OCSD will continue to monitor Hightower's discharge and compliance status during the next reporting period.

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 October, November, and December 2017, Hixson had cadmium and nickel violations. In December 2017, OCSD held a compliance meeting with Hixson during which OCSD pointed out that increasing levels of water usage, as well as wastewater generation and discharge, were noted at the facility. Hixson acknowledged the situation and stated they were working on a solution. In February 2018, OCSD issued an Order to Cease Noncompliant Discharges due to the numerous violations of cadmium, copper, chromium, and nickel detected during downstream monitoring of Hixon's discharge. In March 2018, OCSD held another compliance meeting with Hixson, where Hixson agreed to a Settlement Agreement to settle their continued noncompliance. OCSD conducted another compliance inspection during which pretreatment deficiencies were identified including lack of operating procedures and lack of pretreatment system control and maintenance. These deficiencies were addressed in a Settlement Agreement executed in September 2018 and effective in October 2018. In October 2018, Hixson had chromium and silver violations coinciding with a slug discharge from a broken flange gasket, for which a Notice of Violation was issued the same month. OCSD conducted a Compliance Inspection and resampling during which it was noted that the piping conduit between secondary containment and the pretreatment area contributing to the leak had been capped. The resampling results showed compliance.

In November 2018, as required in the Settlement Agreement, Hixson submitted a Waste Management Plan, an Industrial Waste Characterization, an Operation and Maintenance Manual, and a proposal to install an Ion Exchange System. In addition, installation of an ion exchange system was necessary as a result Hixon'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, Hixon had cadmium daily and monthly average discharge limit violations.

July 1 – December 31, 2019

On **July 8 and 22, 2019**, Notices of Violation were issued for the cadmium daily limit violations that occurred in May and June 2019, respectively. On **July 31, 2019**, OCSD 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 OCSD 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.

On **August 23, 2019**, OCSD issued a Notice of Violation for the June 2019 cadmium daily limit violation. On **August 30, 2019**, OCSD issued a Notice of Violation for the May 2019 cadmium monthly limit violation. Hixson noted that the company 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.

On **November 19, 2019**, Hixson had another cadmium violation. On **November 26, 2019**, OCSD issued a Notice of Violation for the June 2019 cadmium monthly limit violation. On **December 30, 2019**, OCSD issued a Notice of Violation for the November 2019 cadmium violation.

OCSD will conduct a Compliance Inspection during the next quarter and will continue to monitor Hixson's discharge and compliance status on a quarterly basis.

Independent Forge Company (Permit No. 1-021401)

Independent Forge Company (Independent Forge) forges parts for commercial aviation, military specific applications, and other market sectors including bicycles, archery, jet ski, and motorcycle parts. Wastewater is generated from the deburring, caustic etching, acid cleaning, and dye penetrant testing operations and associated rinses. Independent Forge uses a batch treatment system to treat the waste streams from the caustic etching and acid cleaning operations.

In February 2019, Independent Forge had zinc daily and monthly average discharge limit violations. Independent Forge claimed that the root cause of the violation was the filter press, citing the age of the mesh material on the plates caused a loss of removal efficiency. However, Independent Forge was unable to explain the increase of zinc from 12.4 mg/L to 36.6 mg/L between the two sample dates, despite Independent Forge's claim that it was the same batch of treated wastewater. In April 2019, OCSD conducted a Compliance Inspection during which several deficiencies were noted including the lack of a functioning pH meter in the batch treatment system, excessive accumulation of metal-bearing solids in the batch treatment tank, the use of the batch treatment tank as the final holding tank prior to discharge, and the lack of an effective batch treatment procedure.

In May 2019, Independent Forge had another zinc monthly average discharge limit violation. OCSD issued a Compliance Requirements Letter directing Independent Forge to attend a Compliance Meeting later that month to discuss multiple noncompliance issues. In June 2019, OCSD issued a Probation Order requiring Independent Forge to rectify the compliance issues noted above.

July 1 – December 31, 2019

On **August 15, 2019**, Independent Forge submitted a wastewater characterization and waste management plan; however, the waste management plan was incomplete and missing the proposal for batch treatment system modifications. After hiring a third-party consultant, Independent Forge re-submitted the waste management plan with a proposal for batch treatment system modifications. The proposal was not accepted since the planned modifications would not provide Independent Forge the means to maintain long term compliance. On **August 29, 2019**, OCSD issued a Notice of Violation for the May 2019 zinc monthly limit violation. In **September 2019**, Independent Forge indicated they would no longer renew their Class I Wastewater Discharge Permit, which was about to expire end of that month, as they intend to pursue a Zero Discharge Certification instead. On **September 18, 2019**, OCSD issued an Order to Cease Discharge, directing Independent Forge to cease all industrial wastewater discharge on **September 30, 2019,** as a result of permit expiration. On **October 23, 2019**, Independent Forge submitted their application for a Zero Discharge Certification. On **December 12, 2019**, OCSD conducted a Compliance Inspection and verified that all sewer connections had been sealed to prevent further industrial wastewater discharge.

On **October 21, 2019** Independent Forge was published as significantly non-compliant for the 2018-2019 reporting period due to acute zinc discharge violations on **February 7, 2019** and **February 27, 2019**.

OCSD will continue to monitor Independent Forge's discharge and compliance status during the next reporting period.

J&J Marine Acquisitions, LLC (Permit No. 1-551152)

J&J Marine Acquisitions, LLC (J&J Marine) performs boat maintenance and repair work, including hull repairs and recoating, plus interior remodeling. Wastewater is generated from the boat washing and cleaning process. Pretreatment consists of bag filtration followed by electrocoagulation and final pH adjustment. J&J Marine also has the capability to collect, treat, store and reuse stormwater as industrial process water in the boat washing and cleaning process throughout the facility (rather than discharging to the Newport Beach Harbor).

In April 2019, J&J Marine had a copper violation. J&J Marine filed an appeal against the Notice of Violation based on the analytical result of their split sample, which yielded a significantly lower result than OCSD's, below the copper discharge limit.

July 1 – December 31, 2019

On **July 22, 2019**, OCSD conducted a compliance inspection during which J&J Marine reported that while cleaning one of the holding tanks for the treated effluent, a piece of copper scrap metal was found inside, which was most likely the cause of the April 2019 copper violation. OCSD intended to conduct resampling but no wastewater was available to collect a sample. During the inspection, J&J Marine noted that the company was discharging treated stormwater during storm events if the stormwater volume exceeded the facility's containment volume. OCSD reminded J&J Marine that discharge of stormwater to OCSD's sewerage facilities is prohibited.

On **July 23, 2019**, OCSD issued a letter to J&J Marine stating that the result of OCSD's split sample analysis confirmed exceedance of the copper discharge limit; therefore, J&J's appeal of the Notice of Violation was denied.

On **August 12, 2019**, OCSD issued a letter arranging a compliance meeting at the request of J&J Marine and their environmental consultant to discuss J&J Marine's permissible discharges as it pertains to sanitary and industrial wastewater. On **August 27, 2019**, OCSD held a Compliance Meeting with J&J Marine during which J&J Marine confirmed the practice of discharging treated stormwater and runoff to OCSD's sewer when the volume exceeds the facility's storage capacity. OCSD reiterated the prohibition on stormwater discharges to OCSD's sewerage facilities.

On **November 21, 2019**, OCSD issued a Compliance Requirements Letter directing J&J Marine to submit a proposal to mitigate the discharge of stormwater and runoff to the sewer. On **November 26, 2019**, J&J Marine submitted the required proposal.

OCSD will review J&J Marine's stormwater mitigation proposal during the next reporting period, and will continue to monitor J&J Marine's discharge and compliance status on a quarterly basis.

Kenlen Specialties, Inc. (Permit No. 1-021171)

Kenlen Specialties, Inc. (Kenlen) is job shop powdercoater. The company works on aluminum and steel parts, which undergo a washing step prior to painting or powder coating. Washing is done through a three-stage conveyorized automated washing machine with iron phosphate solution to remove any oil or other contaminants on the parts, followed by a dragout rinse and final rinsing with deionized water. The rinsewater is discharged directly from the machine to the sewer through the above ground sample box.

On October 2, 2018, Kenlen had molybdenum and zinc violations, for which a Notice of Violation was issued on October 11, 2018. On October 30, 2018, OCSD conducted a Compliance Inspection during which it was determined that the iron phosphate solution used by Kenlen contained molybdenum and that the violations were a result of dragout entering the rinsewater. Kenlen stated they would instruct their employees to use the dragout to replenish the process bath instead of emptying collected dragout into the rinse tank. OCSD

directed Kenlen to not dispose of remaining molybdenum-based solution to the sewer without treatment. Kenlen is considering replacing their existing iron phosphate solution with a non-molybdate formulation.

July 1 – December 31, 2019

On **October 21, 2019** Kenlen was published as significantly non-compliant for the 2018-2019 reporting period due to an acute molybdenum discharge violation on **October 2, 2018**.

OCSD will continue to monitor Kenlen's discharge and compliance status on a quarterly basis.

Linco Industries

Linco Industries, Inc. (Linco) is a small metal parts stripping and cleaning facility. Parts are mostly automotive and motorcycle wheel rims and other accessories. Paint and other non-metallic coatings are stripped in a high temperature (550°F) salt bath (blend of sodium hydroxide and sodium nitrate), or in cold (160°F) strip tanks (blend of ethanolamine, n-methlpyrrolidone and dibasic ester). Parts from the salt stripping process are rinsed in low volume overflow rinse, controlled and treated with a pH monitor and sulfuric acid solution to reduce the pH down to the 9.0 – 10.0 range, then pumped to an aboveground clarifier. Parts from the cold stripping process are rinsed by a manual high-pressure spray and wastewater from the wash pad area is collected and pumped into a tank for minimal solids settling and oil separation before pumping to the aboveground clarifier. The first stage of the clarifier is used for final pH adjustment with sulfuric acid and caustic. Water from the final stage of clarifier flows over a weir and into a drum where sampling is conducted. Absorbent pads are used in the drum to remove any excess oil.

In January 2019**,** Linco had an oil & grease violation. In March 2019, OCSD conducted a Compliance Inspection during which Linco attributed the cause of the violation to insufficient changing of the oil & grease absorbent pads that are placed on top of the tanks. OCSD directed Linco to maintain a log sheet to record the frequency of replacing the absorbent pads. Linco indicated the possibility of installing an oil skimmer in the future if necessary.

June 1 – December 31, 2019

On **October 15, 2019**, Linco had a zinc violation, for which a Notice of Violation was issued on **November 26, 2019**. On **November 19, 2019**, OCSD conducted a Compliance Inspection during which Linco attributed the violation to operator error. Linco explained that one of their operators opened a wrong valve by mistake, which allowed unfiltered wastewater to bypass part of treatment and be discharged directly to the sewer. Linco reported that the company had made modifications to the pretreatment system in response to previous oil and grease violations. These modifications included installation of two new tanks for pH adjustment and solid settling and an oil skimmer. OCSD directed Linco to disconnect the identified bypass piping immediately and reviewed the new arrangement. On **December 12, 2019**, Linco submitted a corrective action letter which indicated that the bypass had been removed.

OCSD will continue to monitor Linco'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-smeared 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.

July 1 – December 31, 2019

On **September 3, 2019**, OCSD issued a Notice of Violation for the June 2019 copper monthly 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.

OCSD will continue to monitor Logi's discharge and compliance status during the next report period.

Maruchan, Inc. – Laguna Cyn (Permit No. 1-141015)

Maruchan, Inc. – Laguna Cyn (Maruchan Laguna) 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 on a daily basis.

The pretreatment system at Maruchan Laguna consists of a clarifier, in the basement of a wastewater collection building located to the northwest of the manufacturing facility. The clarifier is equipped with a surface skimmer and collector to remove separated oil. A pH adjustment system continuously controls the acidity of wastewater discharge via an automated caustic chemical feed pump. A 10,000-gallon underground grease interceptor captures grease waste not removed in the clarification process, to prevent fats, oils, and grease buildup in the sanitary sewer system. The interceptor is regularly cleaned at least every two-weeks.

July 1 – December 31, 2019

On **July 24, 2019**, OCSD issued a Compliance Requirements Letter to Maruchan Laguna to address the compliance issues relating to stormwater management and pH adjustment system. The proposal for pH adjustment system was due by **September 15, 2019** and the installation for stormwater solution was due by **October 31, 2019**. Maruchan Laguna implemented both solutions on time and no other non-compliance issues have been observed at the facility.

OCSD will continue to monitor Maruchan Laguna's discharge and compliance status on a quarterly basis.

Meggitt, Inc. (Permit No. 1-600006)

Meggitt, 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.

In March 2019, Meggitt had lead and silver monthly average discharge limit violations. In June 2019, Meggitt had another lead monthly average discharge limit violation. OCSD conducted a Compliance Inspection during which Meggitt specified that the only two possible sources for the exceedances are the rinse associated with the silver plating and ceramic dicing machine. OCSD directed Meggitt to implement an additional pre-cleaning step at the rinse associated with silver and the ceramic dicing machine. The permittee is currently in the process of buying a filtration system for the dicing machine to further reduce the lead concentration in the wastewater.

July 1 – December 31, 2019

On **August 2, 2019**, Meggitt had another lead violation, for which a Notice of Violation was issued on **August 20, 2019**. This daily limit exceedance also resulted in a monthly average discharge limit violation for lead for the month of August 2019. The cause of these violations is attributable to the dicing saw and lapping processes. On **August 30, 2019**, Meggitt submitted a corrective action report indicating that the filtration system for the dicing saw was already added. OCSD directed Meggitt to conduct pilot testing before discharging the waste stream directly to the sample point to ensure the filtration system will adequately remove lead from the waste stream. On **September 3, 2019**, OCSD issued a Notice of Violation for the June 2019 lead monthly limit violation. On **September 11, 2019**, Meggitt updated the corrective action report indicating that the company will add a mixed bed resin system in addition to the filtration system to further remove lead from the wastewater. During routine inspection visits, OCSD has confirmed that the pretreatment system is operational and stable. Meggitt had no further violations after the installation of the system. On **November 7, 2019**, OCSD issued a Notice of Violation for the August 2019 lead monthly limit violation.

OCSD will continue to monitor Meggitt's discharge and compliance status 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, OCSD 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, OCSD held the 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, OCSD 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 OCSD's Ordinance, and submit a Slug Discharge Control Plan.

July 1 – December 31, 2019

On **July 24, 2019**, OCSD issued another Compliance Letter for National's failure to submit information required in the previous Compliance Requirements Letter with the exception of the Slug Discharge Control Plan draft submittal.

On **September 18, 2019**, since no proposals or plans had still been received, OCSD issued an Order to Cease Non-Compliance. In this letter, National was directed to attend a Compliance Meeting.

On **October 2, 2019**, OCSD held the Compliance Meeting during which National stated there was a disconnect between staff and their two consultants as to who was responsible for various submittals. OCSD reiterated the need for a stormwater mitigation plan but understood that since National was no longer using acidic products to clean the portable toilets, only a pH monitoring system would be required, not an automatic pH adjustment system as previously required. During the Compliance Meeting, OCSD 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 OCSD.

On **November 4** and **5, 2019**, National had two additional pH violations, for which a Notice of Violation was issued on **November 14, 2019**. On **November 18, 2019**, an Order to Cease Non-Compliant Discharges was issued along with a requirement to attend another Compliance Meeting.

On **November 25, 2019**, OCSD held the Compliance Meeting with National to discuss the two most recent pH violations (one of which had a pH below the State hazardous limit of 2.0 S.U.). Although National had previously informed OCSD that they would no longer use chemicals that caused the pH to fall below 6.0, it was determined that an employee used one of these chemicals during toilet cleaning operations. National mentioned that the employee attempted to manually raise the pH by adding chemicals directly to the clarifier, however added a chemical called "pH Down" which caused the pH to fall below hazardous waste levels. OCSD 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. OCSD and National negotiated a revised settlement in the amount of **$22,000.00**.

On **December 26, 2019**, OCSD issued a Compliance Requirements Letter directing National to install an automatic pH adjustment system.

OCSD will issue National a Settlement Agreement in the next reporting period for all related non-compliances and will continue to monitor National's discharge and compliance status on a quarterly basis.

Patio and Door Outlet, Inc. (Permit No. 1-521783)

Patio and Door Outlet, Inc. (Patio) manufactures and sells high-end patio furniture. Aluminum tubing and sheeting are cut, bent, formed and welded in the manufacture of the framing for chairs and tables. After assembly, frames are washed, iron-phosphated, sealed, and powder-coated in various colors and textures. Patio also manufactures padding and furniture coverings from foam sheets and fabric covers. Wastewater from the iron-phosphate rinse is routed through a three-stage clarifier where it is pH adjusted prior to discharge to the sewer.

In February 2019, Patio had a molybdenum violation. In April 2019, OCSD conducted a Compliance Inspection during which Patio reported that their investigation found the iron-phosphate solution, which is used to prepare metal products for powder-coating, to contain molybdenum. Patio purchased a new non-molybdate metal preparation solution and waste-hauled the molybdenum-bearing wastewater prior to restarting the powder coating preparation system.

July 1 – December 31, 2019

On **October 21, 2019** Patio was published as significantly non-compliant for the 2018-2019 reporting period due to an acute molybdenum discharge violation on **February 21, 2019**.

Patio had no further violations during this reporting period. OCSD will continue to monitor Patio's discharge and compliance status during the next report period.

Pioneer Circuits, Inc. (Permit No. 1-011262)

Pioneer Circuits, Inc. (Pioneer) is a manufacturer of multilayer rigid, rigid-flex, and flexible printed circuit boards and assemblies. The manufacturing of a multilayer board generally proceeds by cutting the copper clad materials, photoresist application, inner-layer circuit imaging, resist developing, cupric chloride etching, and alkaline resist stripping. This is followed by surface prep (Cobra Bond), lamination, and drilling. The holes are cleaned by either permanganate or plasma etching and made conductive through electroless copper plating. Outer-layer circuit development is conducted by pattern plate process steps including photoresist application, circuit imaging, resist developing, copper plating, tin/lead resist plating, ammonium etching, and solder stripping. Solder mask application and surface finishing such as hot air levelling or fuse-oil reflow complete Pioneers' wet process operations. Nickel/gold plating, if required, is outsourced.

The effluent discharge at Pioneer is generated by aqueous fume scrubbing, boiler blowdown, reverse osmosis brine, various spent process solutions, and the associated rinses.

In June 2019, Pioneer had a copper violation.

July 1 – December 31, 2019

On **July 9, 2019**, OCSD issued a Notice of Violation for the previous month's copper violation. On **July 31, 2019**, OCSD conducted a Compliance Inspection and resampling, during which Pioneer attributed the violation to operator error. Pioneer explained that on the day the violation occurred, a batch of Cobra Bond, which is typically treated on its own, was combined with additional wastestreams resulting in improper batch treatment. Pioneer stated that measures have been taken to ensure that all Cobra Bond batches are treated separately from all other wastestreams. The resampling results showed compliance.

OCSD will continue to monitor Pioneer's discharge and compliance status on a quarterly basis.

Primatex Industries, Inc. (Permit No. 1-031036)

Primatex Industries, Inc. (Primatex) performs rotary screen printing of fabrics. Water-based inks are applied to fabric by means of perforated print design screens using one of two rotary printers. The facility also has two Sanforizing machines (a method of stretching, shrinking, and fixing the woven cloth in both length and width, before cutting to reduce the shrinkage which would otherwise occur after washing), two drying machines to dry printed cloth, a sanding machine, a crinkling machine, and two industrial washing and drying machines. Wastewater is generated by the washing of the printers and the washing of cloth in the industrial washing machines. Wastewater is collected in an outside sump from where it is pumped through a lint removal unit then to the inside of a rotating drum filter constructed of screen material. The lint is trapped on the inside, while wastewater passes through the screen and is discharged to a three-stage underground clarifier with sample box. A timed spray rinse above the drum cleans the outside of debris, which falls to a screen located directly below the drum.

On July 3, 2018, Primatex had a zinc violation, for which a Notice of Violation was issued on July 12, 2018. An appeal to the Notice of Violation was received by OCSD on July 27, 2018, but it was denied on August 9, 2018 since OCSD's archive sample test result was consistent with the original test result. On August 6, 2018, OCSD conducted resampling followed by a Compliance Inspection on August 14, 2018. During both the compliance inspection and resampling, OCSD reviewed all available material safety data sheets but could not identify the source of the zinc violation. It was later discovered that a discharge agent called Parolite (used in the production of bright prints on dark fabrics, the main ingredient being Zinc formaldehyde sulfoxylate), which had not been used in over two years, may have been added to the production process by mistake. The remaining Parolite was returned to Primatex's chemical supplier.

July 1 – December 31, 2019

On **October 21, 2019** Primatex was published as significantly non-compliant for the 2018-2019 reporting period due to an acute zinc discharge violation on **July 3, 2018**.

Primatex had no further violations during this reporting period. OCSD will continue to monitor Primatex's discharge and compliance status 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.

July 1, 2019 – December 31, 2019

On **July 24, 2019**, OCSD 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 15, 2019.** Prudential requested an extension of the due date to determine the most appropriate path forward.

OCSD will conduct a Compliance Inspection during the next reporting period to confirm installation of the proposed solution.

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.

July 1 – December 31, 2019

On **August 26, 2019**, OCSD conducted a Compliance Inspection in conjunction with routine quarterly sampling. During the inspection, 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. On **September 24, 2019**, OCSD issued a Compliance Requirements Letter directing QAF-South to correct the deficiencies by **October 31, 2019**. On **November 18, 2019**, OCSD conducted a follow-up Compliance Inspection to verify QAF-South's compliance status and progress. While the tanks had been labeled and the solids were removed from the sample box, the remaining requirements had not been completed.

OCSD will conduct additional inspections during the next reporting period to verify completion of the remaining requirements.

Reid Metal Finishing (Permit No. 1-511376)

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.

July 1 – December 31, 2019

On **December 10, 2019**, OCSD issued a Notice of Violation for the September 2019 cadmium monthly 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 monthly and daily limits.

OCSD will continue to monitor Reid's discharge and compliance status on a quarterly basis.

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, OCSD 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.

July 1 – December 31, 2019

On **July 18, 2019**, Republic had chromium, copper, lead, nickel and zinc violations again, for which a Notice of Violation was issued on **August 20, 2019**. On **August 28, 2019**, OCSD 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. OCSD increased frequency of Republic's heavy metals self-monitoring to monthly effective **December 1, 2019**.

On **October 21, 2019** Republic was published as significantly non-compliant for the 2018-2019 reporting period due to acute cadmium, copper, lead, and zinc discharge violations on **October 3, 2018**.

On **November 7, 2019**, Republic had another copper violation, for which a Notice of Violation was issued on **December 3, 2019**. On **December 16, 2019**, OCSD 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. On **December 30, 2019**, OCSD issued an Order to Cease Non-Compliant Discharges and directed Republic to attend a Compliance Meeting scheduled for the following month to discuss Republic's recurring violations.

OCSD will continue to monitor Republic's discharge and compliance status on a quarterly basis.

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, OCSD 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 is inadequate as primary treatment to remove oil and grease. In April 2019, OCSD 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 OCSD. While Star met the deadline for submitting the proposal, they installed the system without prior acceptance from OCSD. 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 is unclear.

July 1 – December 31, 2019

On **July 10, 2019**, OCSD conducted a Compliance Inspection and resampling during which OCSD 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.

On **August 12, 2019**, OCSD issued a Notice of Violation for the oil & grease noncompliance detected in the previous month's resample. OCSD also issued a Compliance Requirements Letter directing Star to attend a Compliance Meeting to discuss implementation of corrective actions to develop and maintain an effective treatment system. The Compliance Meeting was held on **August 21, 2019**. On **September 24, 2019**, following the Compliance Meeting, OCSD issued another Compliance Requirements Letter requiring Star to complete the installation of the proposed treatment system by **October 30, 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.

On **October 21, 2019** Star was published as significantly non-compliant for the 2018-2019 reporting period due to chronic and acute oil & grease of mineral or petroleum discharge violations on **February 15, 2019** and **March 21, 2019**.

OCSD will continue to monitor Star's discharge and compliance status during the next reporting period.

Stremicks Heritage Foods, LLC

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.

July 1 – December 31, 2019

Due to a pH issue in OCSD's sewer system in the area of Stremick's facility, OCSD conducted 24-hour monitoring of Stremick's discharge from **November 18 to November 19, 2019**. The pH results indicated that the pH fell below 6.0 and above 12.0 on numerous occasions. On **November 20, 2019**, Stremick's had an additional pH violation, for which a Notice of Violation was issued on **December 30, 2019**.

OCSD will conduct a Compliance Inspection during the next quarter and continue to monitor Stremick's discharge and compliance status on a quarterly basis.

Superior Plating (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 bearing wastestreams undergo pH adjustment only.

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

July 1 – December 31, 2019

On **July 1, 2019**, OCSD 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. The final compliance date for the Probation Order schedule was **September 15, 2019**. On **August 15, 2019**, OCSD conducted a Compliance Inspection and found that Superior, with the aid of their consultant, 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.

On **August 14, 2019**, Superior had a cyanide (total) violation, for which issued a Notice of Violation was issued on **September 12, 2019**. This daily limit exceedance also resulted in a monthly average discharge limit violation for cyanide (total) for the month of August 2019. On **September 23, 2019**, OCSD conducted another Compliance Inspection to verify compliance with Probation Order and inquire about the cause of the recent 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 3, 2019**, OCSD 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.

On **November 7, 2019**, OCSD issued a Notice of Violation for the August 2019 cyanide (total) monthly limit violation. OCSD will continue to monitor Superior's discharge and compliance status during the next reporting period to determine if additional enforcement is necessary.

Superior Processing (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. Wastewater is segregated into two wastestreams. The metal-bearing waste is routed to continuous ion exchange system and the cyanide-bearing waste is routed to the batch cyanide destruct system.

July 1 – December 31, 2019

On **July 30, 2019**, Superior Processing had a nickel concentration violation and a nickel mass violation, for which a Notice of Violation was issued on **August 21, 2019**. This daily limit exceedance also resulted in a monthly average discharge limit violation for nickel for the month of July 2019. On **October 3, 2019**, OCSD conducted a Compliance Inspection and resampling during which OCSD 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. OCSD believes that Superior Processing has not had nickel violations in the past because previous OCSD sampling had been conducted when there was no simultaneous discharge from the cyanide destruct system. Thus, OCSD suspects that the nickel violations came from the cyanide destruct system effluent, as there was simultaneous discharge from that system at the time of sampling. Hence, OCSD 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.

On **October 14, 2019**, OCSD issued a Notice of Violation for the July 2019 nickel monthly limit violation.

Though Superior Processing had already replumbed the cyanide treatment system effluent through the ion exchange system, on **December 3, 2019**, Superior Processing had another nickel concentration violation and another nickel mass violation. OCSD will issue a Notice of Violation and conduct a follow-up Compliance Inspection for these recent violations during the next reporting period.

Tayco Engineering, Inc. (Permit No. 1-031012)

Tayco Engineering, Inc. (Tayco) manufactures temperature sensors, flexible heaters, flat cables, high temperature heaters, and pressure switches for use in aerospace, satellite, military, and other general aviation applications. Rinsewater generated from the scrubbing of nickel and copper alloys is recirculated for approximately one week before discharge to a collection tank, then pumped over to the pretreatment system. Tayco uses a batch treatment system (hydroxide precipitation) for the etcher and scrub sink rinsewaters, spent developer/stripper solutions and rinses, and etcher fume scrubber bleed off. Spent etching solution and resist stripper solids are wastehauled offsite.

In December 2018, Tayco had copper daily and monthly average discharge limit violations. In February 2019, OCSD conducted a Compliance Inspection during which Tayco attributed the violation to a wastewater treatment operator forgetting to check the wastewater for copper prior to batch discharge. Tayco's corrective

action included additional checks for copper prior to batch discharge and better recordkeeping through a more detailed batch discharge log.

July 1 – December 31, 2019

In **September 2019**, Tayco had another copper monthly average discharge limit violation. OCSD will issue a Notice of Violation for this monthly limit exceedance during the next reporting period.

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. Resultant water is discharged to the sewer system.

In July 2018, Thompson Energy had an oil & grease violation. In September 2018, OCSD 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 of mineral or petroleum origin violation.

July 1 – December 31, 2019

On **July 9, 2019**, OCSD issued a Notice of Violation for the previous month's oil & grease violation. On **August 12, 2019**, OCSD conducted a Compliance Inspection, during which Thompson Energy indicated that the source of the violation was failure of LMI 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. On **August 28, 2019**, Thompson Energy had another oil & grease violation, for which a Notice of Violation was issued on **October 28, 2019**.

On **November 12, 2019**, OCSD conducted a Compliance Inspection and resampling during which OCSD determined that Thompson Energy's ongoing oil & grease violations are being caused by insufficient retention time due to one of the two clarification tanks being out of service, along with other multiple operational issues. During the next reporting period, OCSD will pursue escalated enforcement action as a result of the continued noncompliance.

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 it consists of pH adjustment, flocculation, 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, OCSD 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. OCSD 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.

July 1 – December 31, 2019

On **July 18, 2019**, OCSD 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. On **July 22, 2019,** OCSD issued the Notice of Violation for the copper violation.

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

Ultra-Pure Metal Finishing, Inc. (Permit No. 1-021703)

Ultra-Pure Metal Finishing, Inc. (Ultra-Pure) is a metal finishing job shop. Customer-supplied parts made of aluminum and steel are received for anodizing or chemfilm application. Colored dyes are used on aluminum parts, while acid preclean and zinc plating are used on steel parts. Wastewater is generated from the rinse water tanks following the chemical process tanks. Pretreatment consists of hexavalent chrome reduction, hydroxide precipitation, coagulant addition, and polymer/flocculation for metals precipitation, and clarification. Solids from the clarifier are processed in a sludge thickening tank and filter press, with filtrate returning to the beginning of the pretreatment system.

In April 2019, Ultra-Pure had zinc daily and monthly average discharge limit violations. In May 2019, Ultra-Pure submitted a corrective action letter stating that the root cause of the violation was the processing of new parts that had trapped highly concentrated solutions. The high concentration drag-out was then carried to the rinses and caused the treatment system to be slug loaded. In June 2019, OCSD conducted a Compliance Inspection and noted additional pretreatment issues including slug loading of the continuous treatment system with concentrated floor waste and inadequate record keeping of daily maintenance.

July 1 – December 31, 2019

On **July 1, 2019**, OCSD issued a Notice of Violation for the April 2019 zinc monthly limit violation. On **July 25, 2019**, OCSD issued a Compliance Requirements Letter requiring Ultra-Pure to discontinue the practice of slug-loading the treatment system with concentrated floor waste, maintain a daily checklist of relevant pretreatment system parameters, and submit updated facility drawings to OCSD. On **September 12, 2019**, Ultra-Pure submitted the updated facility drawings. On **October 16, 2019**, OCSD conducted a Compliance Inspection during which OCSD verified completion of the compliance requirements.

OCSD will continue to monitor Ultra-Pure's discharge and compliance status on a quarterly basis.

Vit-Best Nutrition, Inc. (Permit No. 1-600010)

Vit-Best Nutrition, Inc. (Vit-Best) performs compounding of various vitamins and nutritional supplements from food grade components. The components for the vitamins are mixed in tanks and undergo further processing to create the final product. Wastewater discharge consists of unit washdowns and mop-water from general cleaning that occurs between product runs.

In June 2019, Vit-Best had a pH violation.

July 1 – December 31, 2019

On **July 9, 2019**, OCSD issued a Notice of Violation for the previous month's pH noncompliance. On **July 18, 2019**, OCSD conducted a Compliance Inspection during which Vit-Best indicated that the most likely source of low pH was due to production operations associated with citric acid. In a typical operation, citric acid powder is screened after blending through a shaker screen. On **July 23, 2019**, Vit-Best submitted their corrective action, which included vacuuming the shaker screen prior to washing operations. Vit-Best stated that this new procedure will further collect residual citric acid to prevent any future non-compliant discharge.

OCSD will continue to monitor Vit-Best's discharge and compliance status on a quarterly basis.

chapter 3

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 (WMWD). 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 (OCSD) 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 OCSD to comply with environmental standards before discharge to the ocean outfall. The capacity of the Brine Line available to SAWPA is 30 MG per day (MGD). The average daily discharge was 10.88 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 OCSD'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 OCSD. 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 (WMWD), 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 OCSD's treatment facilities. As of December 31, 2019, there are forty-two (42) direct connections including twelve (12) emergency connections discharging to the Brine Line. Twenty (20) 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 WMWD.

SAWPA has the permitting responsibilities for all Liquid Waste Haulers (LWH) that use the Collection Stations. As of December 31, 2019, there are ten (10) 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, 2019 through December 31, 2019) 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 (OCSD) has completed the process of updating and revising their Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OCSD SAWPA is required to update their Ordinance to include relevant OCSD revisions. SAWPA has developed draft Ordinance No. 9 which has been revised to incorporate the updates within the new OCSD Ordinance. SAWPA submitted the draft Ordinance to OCSD for their review and concurrence on October 17, 2019. It is anticipated SAWPA will receive comments from OCSD regarding the draft Ordinance in early 2020.

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 is being 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 elected to install Reverse Osmosis (RO) treatment of the tertiary treated wastewater treatment plant effluent. The RO concentrate will be 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 bine concentrate to the Brine Line, discharge of a minimum 685 tons of salt to the Santa Ana River are avoided, benefiting the downstream groundwater basins. The RO facility is expected to be completed, tested and on-line and connection to the Brine Line completed in mid-2020. Currently there are no permitted users within the Beaumont Service Area.

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

- **Infineon Technologies Americas Corporation (Permit No. I1039-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Infineon Technologies Americas Corporation (Infineon) on November 20, 2019 for a pollutant limitation violation. On November 11, 2019 EMWD received a low pH alarm at its Integrated Operations Center from an inline pH meter at the EMWD Collection Station. The pH was at 5.7 S.U. a violation of the Daily Minimum Discharge Limitation of 6.0 S.U. as stated in Permit No. I1039-3. The NOV/OCA required the permittee to submit a written report detailing the cause, and corrective taken to prevent the recurrence of the violation by no later than December 4, 2019. Infineon responded on November 27, 2019 and attributed the cause of the violation to a fouled pH sensor which caused the system to under correct for chemical addition. Immediately upon discovery of the pH violation Infineon cleaned and re-calibrated the pH meter. Infineon made a decision to clean the pH sensor twice a day to prevent any re-occurrence, and in addition the truckers who haul are now required to take the pH with a handheld pH meter for confirmation of the pH with the inline pH meter. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. EMWD shall continue to conduct unannounced inspections and wastewater monitoring at Infineon to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

- **Eastside Water Treatment Facility (Permit No. I1024-2.1)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Eastside Water Treatment Facility (Eastside) on June 26, 2019 for a pollutant limitation violation. On June 4, 2019, IEUA collected a wastewater sample from Monitoring Point 002. The pH field analysis indicated the pH was 5.3 SU which exceeded the Local Daily Minimum Discharge Limitation of 6.0 SU as stated by Permit. The NOV/OCA required Eastside to submit a written report detailing the cause of the violation and corrective actions on or before July 10, 2019. Furthermore, the permittee is required to test the pH of every wastewater load to ensure compliance prior to transporting them to the collection station. Eastside responded on July 9, 2019 and attributed the cause of the violation to low quality salt that was delivered to its facility and used in the ion exchange process. Eastside stated its employees will inspect all loads of salt to verify the quality prior to accepting them. Eastside also stated their hauler took a wastewater load prior to operating hours without confirming pH was between 6.0 S.U. and 12.0 S.U. Treatment Plant operators received training and reviewed SOP procedures to ensure pH is checked on each load prior to hauler leaving its facility. Eastside also notified their hauling company was also notified wastewater shall not be removed from the site until a City employee checks the pH. 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 Eastside to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

- **OLS Energy – Chino (Permit No. D1059-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to OLS Energy – Chino (OLS) on October 2, 2019 for a pollutant limitation violation and hazardous waste discharge. On September 22, 2019, OLS discharged 59 gallons of low pH wastewater (1.5 SU) to the Brine Line. This low pH discharge is a prohibited waste as stated in SAWPA Ordinance No. 8 and IEUA Ordinance No. 106. Furthermore, OLS failed to immediately notify the Control Authorities as required by permit. The NOV/OCA required OLS to cease and desist discharging low pH wastewater, continue to implement the corrective actions stated in its written response submitted on September 23, 2019, and update its current SOP for its pH neutralization process. The response indicated the violation may have been caused by stratification in neutralization tank (D203). OLS stated it is implementing safeguards to prevent recurrence. The facility has two neutralization tanks, D203 and D204. Only D203 has a source of low pH wastewater. OLS will perform the mixing in Neutralization Tank D203 and then transfer it into tank D204 for additional mixing to ensure pH stability prior to discharging it to the Brine Line. On October 16, 2019, OLS submitted an updated SOP for neutralization process. On November 11, 2019, as required by permit, the Permittee reported to the EPA Regional Waste Management Division that it discharged 59 gallons of hazardous waste to the Brine Line. 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 OLS 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 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 No. 1 expanded from 1,900 acres to 3,000 acres in 1992. In June 1989, JCSD contracted with WMWD for capacity in Reach IV-D of the Brine Line.

Enforcement Action

- **Del Real, LLC (Permit No. D1021-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Del Real, LLC (Del Real) by JCSD on February 1, 2019 for pollutant limitation and temperature exceedance violations. On January 27, 2019 Del Real LLC submitted pH and temperature data records from the pH meter Monitoring Point 001, the permitted monitoring point, via email as requested by JCSD staff. The pH of the industrial effluent discharged exceeded the Local Daily Minimum Discharge Limitation of 6.0 S.U. as defined by Permit on January 3, 4, 5, 6, 8, 9, 11, 13, 20, 25, and 26, 2019. Additionally, the temperature data submitted with the pH data records indicated several temperatures as high as 186 degrees Fahrenheit, exceeding the limit of 140 degrees Fahrenheit as stated in SAWPA Ordinance 8 Article 2 Section 201.0J. The NOV/OCA required Del Real to submit a written report by February 18, 2019 stating the cause of the pH and temperature violations and planned corrective actions to ensure that future pH and temperature discharges will be within the Local Non-Domestic Wastewater Limitations Concentration Values. Permittee responded on February 18, 2019 and attributed the pH exceedances to erroneous readings of an unsecured probe in the Monitoring Point 001 Manhole. Del Real replaced the probe and secured it in place in Monitoring Point 001. Additional corrective actions taken by Del Real were to change the Dissolved Air Flotation (DAF) set point from 6.5 to 8 S.U., installation of a thermostatic mixing valve to maintain boiler blowdown temperatures within the compliance range, and a pH dosing connection from the current DAF Caustic tank to the DAF effluent sample box at the exit of the DAF to immediately correct pH. A compliance inspection on August 15, 2019 confirmed installation of AF-3 automated chemical control system which manages chemical dosing at pH tank and emergency caustic pump at the DAF sample box. Implementation of the corrective actions identified above, follow-up site visits, and pH compliance monitoring indicated compliance; subsequently, the enforcement action was closed. JCSD shall continue to conduct unannounced inspections and wastewater monitoring at Del Real to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

There was no enforcement action during this reporting period.

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

There was no enforcement action during this reporting period.

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 (WMWD). SAWPA, through the MOU with OCSD, 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

- **Del Real, LLC (Permit No. D1021-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Del Real, LLC (Del Real) by SAWPA on July 14, 2016 for a bypass in the pretreatment wet well and for exceedance of their Brine Line purchased capacity. The NOV/OCA required Del Real to submit a corrective action plan regarding the bypass and to apply for additional Brine Line capacity. Del Real repaired and made improvements to the existing alarm system to the wet well, which was verified by SAWPA during inspection. Del Real also installed and repaired screens for the production room drains. Del Real submitted a request for additional Brine Line capacity and a Water Balance Report which detailed water consumption and wastewater discharged to the Brine Line. Del Real agreed to purchase an additional 163,000 gallons of Brine Line capacity and submitted the Water Balance Report. Implementation of the corrective actions identified above, and follow-up site visits indicated compliance; subsequently, the enforcement action was closed. JCSD shall continue to conduct unannounced inspections and wastewater monitoring at Del Real to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

- **Del Real, LLC (Permit No. D1021-3)**

A Notice of Violation and Order for Corrective Action and Notice of Significant Noncompliance (NOV/OCA) was issued to Del Real, LLC (Del Real) by SAWPA on May 15, 2019 for a pollutant limitation and failure to report said violation within 24 hours of becoming aware of the violation. Furthermore, Del Real failed to report said violation within 45 days of the required report due date placing the facility in Significant Noncompliance for the 2nd and 3rd quarters of the 2018-2019 fiscal year. On August 10, 2018 Del Real collected a wastewater sample from Monitoring Point 001. The field pH result obtained August 10, 2018 indicated a pH result of 5.4 S.U., a violation of the pH minimum discharge limitation of 6.0 S.U. as stated in the wastewater discharge permit. Furthermore, this violation was not communicated to JCSD until submittal of the Self-Monitoring Report in January 2019. The NOV/OCA required submittal of a written report detailing why the pH violation was not reported as required and what corrective action would be taken to ensure future violations of this nature do not occur again by May 29, 2019. The permittee responded requesting an extension of the deadline until June 3, 2019, which was granted. The permittee provided the report on June 3, 2019. The report identified the cause of the reporting violation as a failure of staff to properly identify the violation and therefore reporting was not made as required. The permittee will ensure proper personnel are present during laboratory field analyses and the contract laboratory will be directly notifying personnel should any further violations be identified so that notification can be made as required. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. JCSD shall continue to conduct unannounced inspections and wastewater monitoring at Del Real to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

- **EMWD Perris and Menifee Desalination Facility (Permit No. D1061-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to the EMWD Perris and Menifee Desalination Facility by SAWPA on November 7, 2019 for discharging to the Brine Line without obtaining a Wastewater Discharge Permit. On October 2, 2019 EMWD Source Control staff notified SAWPA that a contractor operator for the Desalitech R.O. pilot project discharged 250 gallons of wastewater to the Brine Line without obtaining a Wastewater Discharge Permit for the discharge. The NOV/OCA required EMWD to submit a written report to SAWPA detailing how the violation shall be prevented in the future. The written report was due no later than November 21, 2019. An extension on the November 21, 2019 deadline was requested and granted to accommodate signing of the response by the Authorized Representative to November 22, 2019. The response to the NOV/OCA was received November 22, 2019. EMWD has developed a Standard Operating Procedure to prevent future non-compliant discharges to the brine line from contracted operators or EMWD employees. 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 EMWD Perris and Menifee Desalination Facility to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

- **Alpha Petroleum (Permit No. H1126-1)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Alpha Petroleum by SAWPA on December 20, 2019 for discharging a wastewater load to the Brine Line without cleaning the waste hauler truck as required resulting in an unauthorized discharge to the IEUA Collection Station. On November 27, 2019 at 12:30 p.m., Alpha Petroleum discharged a wastewater load, which originated from Eastside Water Treatment Facility (EWTF), to the IEUA Collection Station. After the wastewater was offloaded to the IEUA Collection Station the tanker hose was disconnected by the driver and an IEUA inspector witnessed the discharge of grease leaking out of the tankers discharge pipe and onto the ground. When the IEUA inspector questioned the driver concerning the grease discharging from the tanker, the driver stated a load of wastewater containing grease was transported and offloaded at a different site, but the tanker was not cleaned prior to loading wastewater from the EWTF. Alpha Petroleum failed to follow the actions submitted in their Liquid Waste Hauler Cleaning and Maintenance Plan a violation of Wastewater Discharge Permit No. H1126-1. The NOV/OCA required the permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violations by no later than 1/6/2020. SAWPA and IEUA shall continue to

conduct unannounced inspections and wastewater monitoring at the IEUA Collection Station of Alpha Petroleum to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

3.2.9 Western Municipal Water District (WMWD)

Description of WMWD

WMWD 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. WMWD 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. WMWD 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. WMWD 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

- **Decra Roofing Systems (Permit No. I1020-3)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Decra Roofing Systems (Decra) by WMWD on August 8, 2019 for pollutant discharge limitation violation. On July 23, 2019 Decra collected a wastewater sample from Monitoring Point 001. The field analysis results reported by Decra on July 24, 2019 indicated a Dissolved Sulfide concentration of 1.1 mg/L, which exceeded the Daily Maximum Discharge Limitation of 0.5 mg/L as stated in Permit No. I1020-3. The NOV/OCA required Decra to investigate the cause of the violation and submit a report with corrective actions by August 16, 2019. Additionally, Decra was required to resample for dissolved sulfides weekly for three consecutive weeks and submit the first result by August 23, 2019. The remaining results must be submitted within 10 days of receiving them. Decra submitted the Corrective Actions Report on August 19, 2019. An informal notice was provided for the late report and it was immediately provided. The first resample was submitted and indicated a non-detect for dissolved sulfides (<0.01mg/L). The contracted lab could not provide accurate results for the remaining two samples due to a lab error. Decra rescheduled the sampling and it was completed on September 19, 2019 and September 26, 2019. The results for both samples indicated non-detect for the dissolved sulfides (<0.01mg/L). Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. WMWD shall continue to conduct unannounced inspections and wastewater monitoring at Decra to ensure consistent compliance with permit requirements and SAWPA

Ordinance No. 8.

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, 2019, of the active seventy-two (72) 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, 2019

EMWD, IEUA, JCSD, SBMWD, Valley District, SAWPA, & WMWD Permittees		
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 2020/2021.

City of Beaumont is actively exploring alternatives and developing plans to upgrade the City's existing wastewater treatment plant. These plans include a salinity management strategy to comply with basin plan objectives set by the Regional Water Quality Control Board for the Beaumont and San Timoteo Groundwater Management Zones. These proposed improvements are contingent on the ability to tie the discharge from the proposed treatment plant upgrade to the Brine Line for brine conveyance. The City of Beaumont is not within the Brine Line Service Area, so therefore requires authorization from OCSD General Manager prior to discharge. The City of Beaumont submitted an official request to discharge to the Brine Line in late 2016. SAWPA requested additional information before submitting to OCSD a request for authorization for the discharge from the City of Beaumont to the Brine Line from OCSD in early 2017. Following resolution of requirements given to SAWPA and the City of Beaumont by OCSD authorization for connection to the Brine Line is anticipated for early January 2020.

Rialto Bioenergy is a food waste-to-energy facility in Rialto, California, which has submitted a wastewater discharge permit application to SAWPA and Valley District. The facility is expected to come online and begin discharge to the Brine Line in mid-2020 following issuance of a wastewater discharge permit.

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) 4A-0010.
4. Siphon cleaning on Reach 4A Upper (Pine Avenue Siphon).

Activity	Reach 4A Lower	Reach 4B Lower	Corona Lateral	Reach 4A Upper
ROW Maintenance	1.5 miles	3 miles	0.3 miles	-
Line Inspection	-	1,400 ft	1,250 ft	-
Line Cleaning	-	1,400 ft	1,250 ft	-
MAS Inspected	19	15	3	-
Siphon Cleaned	-	-	-	1

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

A flow meter installed at the Orange County line measures SAWPA's discharge (SMS). For the one billing days during the six-month period from July 1, 2019 through December 31, 2019, a total of 1,990.79 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.

Tables 3.2 and 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 OCSD'S SARI METERING STATION, July – September 2019
SAWPA/Orange County Sanitation District

	July 19		August 19		September 19		Quarterly Average	
Average Daily Flow in MGD	10.6457		10.2861		11.0311		10.6543	
Pollutant	**mg/L**	**lb/day**	**mg/L**	**lb/day**	**mg/L**	**lb/day**	**mg/L**	**lb/day**
Arsenic	0.0056	0.4972	ND	****	ND	****	0.0014	0.1244
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	ND	****	ND	****	ND	****	ND	****
Copper	0.0117	1.0343	ND	****	ND	****	0.0029	0.2588
Lead	ND	****	ND	****	ND	****	ND	****
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	ND	****	ND	****	ND	****	ND	****
Silver	0.0105	0.9322	0.0090	0.7721	0.0087	0.7973	0.0093	0.8219
Zinc	0.0364	3.2318	0.0382	3.2770	0.0530	4.8760	0.0433	3.8475
Total Metals	**0.0642**	**5.6956**	**0.0472**	**4.0491**	**0.0617**	**5.6733**	**0.0569**	**5.0526**
BOD	39.4063	3,498.6904	18.2375	1,564.5266	24.9040	2,291.1618	27.1035	2,408.3379
TSS	83.5000	7,413.5613	58.2500	4,997.0485	79.1600	7,282.7003	74.5088	6,620.6299

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 OCSD'S SARI METERING STATION, October – December 2019

SAWPA/Orange County Sanitation District

	October 19		November 19		December 19		Quarterly Average	
Average Daily Flow in MGD	11.5526		11.3947		10.2591		11.0688	
Pollutant	**mg/L**	**lb/day**	**mg/L**	**lb/day**	**mg/L**	**lb/day**	**mg/L**	**lb/day**
Arsenic	ND	****	ND	****	ND	****	ND	****
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	ND	****	0.0070	0.6652	0.0150	1.2834	0.0064	0.5885
Copper	0.0156	1.5030	0.0133	1.2608	0.0166	1.4203	0.0150	1.3824
Lead	ND	****	ND	****	ND	****	ND	****
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	ND	****	ND	****	ND	****	ND	****
Silver	0.0100	0.9635	0.0103	0.9820	0.0155	1.3262	0.0115	1.0616
Zinc	0.0235	2.2674	0.0368	3.4972	0.0481	4.1155	0.0347	3.1987
Total Metals	**0.0491**	**4.7339**	**0.0674**	**6.4051**	**0.0952**	**8.1454**	**0.0675**	**6.2312**
BOD	32.3280	3,114.7629	28.8360	2,740.3279	37.3286	3,193.8760	32.0578	2,959.3786
TSS	67.0800	6,463.0751	81.7600	7,769.7742	104.0000	8,898.3610	80.8906	7,467.3213

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 2019/2020

Orange County Sanitation District (OCSD) - Resource Protection Division
July to Dec 2019 List of SIUs with Monitoring & Compliance Status

Facility Name	Permit No.	Physical 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	471.14(a)	1	-	-		
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	8	3		
A & K Deburring and Tumbling, Inc.	1-511362	2008 S. Yale St. Unit H Santa Ana, CA 92704	332812	403.5(d)	2	12	2		
A & R Powder Coating, Inc.	1-021088	1198 N. Grove St. Unit B Anaheim, CA 92806	332812	433.17(a)	3	12	3		
Access Business Group, LLC	1-531435	5600 Beach Blvd. Buena Park, CA 90621	325412	439.47	2	6	4		
Accurate Circuit Engineering	1-011138	3019 Kilson Drive Santa Ana, CA 92707	334412	433.17(a)	2	15	3		
Active Plating, Inc.	1-011115	1411 E. Pomona St. Santa Ana, CA 92705	332813	433.17(a)	2	17	29		
ADS Gold, Inc.	Z-321851	3843 E. Eagle Drive Anaheim, CA 92807	331410	433.17(a)	-	-	-		
Advance Tech Plating, Inc.	1-021389	1061 N. Grove St. Anaheim, CA 92806	332813	433.17(a)	3	27	6	Zinc	
Advanced Plating Technology	Z-371321	1765 N. Batavia St. Orange, CA 92865	332813	433.17(a)	1	-	-		
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave. Garden Grove, CA 92841	332722	403.5(d)	2	-	-		
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St. Garden Grove, CA 92841-3932	332722	433.15(a), 471.64(a), 471.65(a)	2	21	29		
Alex C. Fergusson	1-031186	8371 Monroe Ave. Stanton, CA 90680	325611	417.166, 417.176, 417.36	2	12	2		
Alexander Oil Company	1-581185	19065 Stewart St. Huntington Beach, CA 92648	211111	403.5(d)	2	10	2		
All Metals Processing of O.C., Inc.	1-031110	8401 Standustrial St. Stanton, CA 90680	332813	433.17(a)	2	13	9		
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Road Irvine, CA 92618	325412	439.47	2	12	5		

Orange County Sanitation District (OCSD) - Resource Protection Division
July to Dec 2019 List of SIUs with Monitoring & Compliance Status

Facility Name	Permit No.	Physical Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Allied Electronics Services, Inc.	1-011073	1342 E. Borchard Santa Ana, CA 92705	334412	433.17(a)	2	13	3		
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)	2	18	1		
Alloy Tech Electropolishing, Inc.	1-011036	2220 S. Huron Drive Santa Ana, CA 92704	332812	433.17(a)	2	9	3		
Alsco, Inc.	1-021656	1755 S. Anaheim Blvd. Anaheim, CA 92802	812331	403.5(d)	2	13	8		
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E. Alton Ave. Santa Ana, CA 92707	332112	467.46	2	14	11		
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Santa Ana, CA 92704	332112	467.45	2	10	5		
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St. Santa Ana, CA 92704	332112	467.45, 467.46	2	10	8	Zinc	
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave. Santa Ana, CA 92704	332112	467.46	2	8	5		
American Circuit Technology, Inc.	1-021249	5330 E. Hunter Ave. Anaheim, CA 92807	334412	433.17(a)	2	15	1		
Amerimax Building Products, Inc.	1-021102	1411 N. Daly St. Anaheim, CA 92806	332812	465.35	2	12	4		
Ameripec, Inc.	1-031057	6965 Aragon Circle Buena Park, CA 90620	312111	403.5(d)	2	10	6		
Ametek Aerospace, Inc.	Z-361006	17032 Armstrong Ave. Irvine, CA 92614	334511	433.17(a)	-	-	-		Zero Discharge Certification Deactivated on 12/31/2019
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd. Anaheim, CA 92806	331318	467.35(c)	2	17	4		
Anchen Pharmaceuticals, Inc. (Fairbanks)	1-541180	72 Fairbanks Irvine, CA 92618	325412	439.47	2	13	15	pH	
Anchen Pharmaceuticals, Inc. (Goodyear)	1-600359	5 Goodyear Irvine, CA 92618	325412	439.47	2	11	15	acetone	
Anchen Pharmaceuticals, Inc. (Jeronimo)	1-541179	9601 Jeronimo Road Irvine, CA 92618	325412	439.47	2	11	15		

Orange County Sanitation District (OCSD) - Resource Protection Division
July to Dec 2019 List of SIUs with Monitoring & Compliance Status

Facility Name	Permit No.	Physical Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
Andres Technical Plating	1-521798	1055 Ortega Way Unit C 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	5		
Anodyne, Inc.	1-511389	2230 S. Susan St. Santa Ana, CA 92704	332813	433.17(a)	2	11	14		
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 Rowland Santa Ana, CA 92707	332813	433.17(a)	2	13	9		
APCT Orange County	1-600503	1900 Petra Ln. Unit C Placentia, CA 92870	334412	433.17(a)	2	18	34		
Arconic Global Fasteners & Rings, Inc.	1-021081	800 S. State College Blvd. Fullerton, CA 92831-5334	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)	4	29	20	Molybdenum	
ARO Service	1-021192	1186 N. Grove St. Anaheim, CA 92806	336411	433.17(a)	2	9	3		
Arrowhead Products Corporation	1-031137	4411 Katella Ave. Los Alamitos, CA 90720	336413	433.17(a)	2	13	10		
Aseptic Technology LLC	1-600716	4940 E. Landon Drive Anaheim, CA 92807	31193	403.5(d)	2	5	5		
Astech Engineered Products, Inc.	1-571295	3030 Red Hill Ave. Santa Ana, CA 92705	336412	433.17(a)	2	13	9		
Astech Engineered Products, Inc. # 2	Z-371320	3030 Red Hill Ave. Santa Ana, CA 92705	336412	-	1	-	-		
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave. Santa Ana, CA 92707	325611	417.166	2	11	5		
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd. Costa Mesa, CA 92626	336413	433.17(a)	2	11	2		
Avid Bioservices, Inc.	1-571332	14191 Myford Road Tustin, CA 92780	325414	439.17, 439.27	1	2	2		
B&B Enameling, Inc.	Z-331432	17591 Sampson Ln. Huntington Beach, CA 92647	332812	433.17(a)	-	-	-		
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave. Irvine, CA 92614	325412	439.47, 463.26, 463.36	2	12	5		

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B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Parkway Irvine, CA 92614	325412	439.47	2	8	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	11	5		
Basic Electronics, Inc.	1-031094	11371 Monarch St. Garden Grove, CA 92841	334412	433.17(a)	2	11	2		
Bazz Houston Co.	1-031010	12700 Western Ave. Garden Grove, CA 92841	33211	403.5(d)	2	13	6		
Beckman Coulter, Inc.	1-521824	200 S. Kraemer Blvd. Brea, CA 92821	334516	433.17(a)	2	9	3		
Beo-Mag Plating	1-511370	3313 W. Harvard St. Santa Ana, CA 92704	332813	433.17(a)	2	8	12		
Bimbo Bakeries Usa, 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	9	3		
Blue Lake Energy	1-521785	5837 Casson Drive 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)	3	34	2	Molybdenum	
Boeing Company (Graham)	1-111018	15400 Graham St. Huntington Beach, CA 92649	33641	433.17(a)	2	17	3		
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)	3	13	1	pH	
Bridge Energy, LLC	1-600398	2744 Valencia Ave. Brea, CA 92821	211111	403.5(d)	2	11	3		
Bridgemark Corporation	1-521844	2930 E. Frontera St. Unit A Anaheim, CA 92806	211111	403.5(d)	1	1	2		
Brindle/Thomas - Bradley	1-531428	221 1st St. Huntington Beach, CA 92648	211111	403.5(d)	2	14	2		

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Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St. Huntington Beach, CA 92648	211111	403.5(d)	2	17	2		
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln. Huntington Beach, CA 92648	211111	403.5(d)	2	13	2		
Brindle/Thomas-Dabney & Patton	1-531427	19192 Stewart Ln. Huntington Beach, CA 92648	211111	403.5(d)	2	14	2		
Bristol Industries	1-021226	630 E. Lambert Road 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)	4	62	54	Cadmium, CN, CN amen., Nickel, Silver	
Broncs, Inc., dba WesCoast Textiles, Inc.	1-600519	12641 Industry St. Garden Grove, CA 92841	313310	403.5(d)	2	7	-		Class 1 Permit Deactivated on 12/16/2019
Brothers International Desserts (North)	1-600583	1682 Kettering St. Irvine, CA 92614-5614	311520	403.5(d)	3	10	2	pH	
Brothers International Desserts (West)	1-600582	1682 Kettering St. Irvine, CA 92614-5614	311520	403.5(d)	2	10	2		
Burlington Engineering, Inc.	1-521770	220 W. Grove Ave. Orange, CA 92865	332811	433.17(a)	2	7	2		
Cadillac Plating, Inc.	1-021062	1147 W. Struck Ave. Orange, CA 92867	332813	433.17(a)	4	27	25		
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln. Huntington Beach, CA 92649	332813	433.17(a)	2	15	15		
California Faucets	Z-331431	5271 Argosy Huntington Beach, CA 92649	332812	433.17(a)	1	-	-		
California Gasket and Rubber Corporation	1-521832	533 W. Collins Ave. Orange, CA 92867	339991	428.66(a)	2	5	2		
Cargill, Inc.	1-031060	600 N. Gilbert St. Fullerton, CA 92833	311225	403.5(d)	3	12	6		
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave. Garden Grove, CA 92841	331318	467.46	2	9	5		

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CD Video, Inc.	1-511076	12650 Westminster Ave. Garden Grove, CA 92706-2139	334613	433.17(a)	2	10	3		
Central Powder Coating	1-021189	593 Explorer St. Brea, CA 92821	332812	433.17(a)	2	14	3		
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	9	8		
Circuit Technology, Inc.	1-521821	1911 N. Main St. Orange, CA 92865	334112	433.17(a)	2	12	3		
Cirtech, Inc.	1-600689	250 E. Emerson Ave. Orange, CA 92865	334112	433.17(a)	1	6	14		
City of Anaheim - Public Utilities Dept	1-021073	6751 E. Walnut Canyon Road Anaheim, CA 92807	221310	403.5(d)	2	-	-		
City Of Anaheim - Public Utilities Dept.	1-521862	1144 N. Kraemer Blvd. Anaheim, CA 92806	221112	403.5(d)	2	-	-		
City of Anaheim Public Utilities (Water Services WRDF)	1-521843	210 S. Anaheim Blvd. Anaheim, CA 92805	221320	403.5(d)	2	7	-		
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	8	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	-	-		Previously listed as City of Newport Beach
City of Tustin - Maintenance Yard	1-071058	1472 Service Road Tustin, CA 92780-1200	921190	403.5(d)	2	11	3		
City of Tustin Water Service (17Th St.)	1-071013	18602 E. 17th St. Tustin, CA 92705	221310	403.5(d)	2	7	1		
City of Tustin, Water Service (Main St)	1-071268	235 E. Main St. Tustin, CA 92780	221310	403.5(d)	1	-	-		
CJ Foods Manufacturing Corp.	1-521849	500 State College Blvd. Fullerton, CA 92831	311824	403.5(d)	2	10	6		

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CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave. Costa Mesa, CA 92627	332911	433.15(a)	1	-	-		
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St. Huntington Beach, CA 92649	334412	433.17(a)	3	21	9	pH	
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave. Garden Grove, CA 92841	332812	433.17(a)	1	4	-		New Class 1 Permit Issued on 07/01/2019
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Drive Garden Grove, CA 92841	332813	433.17(a)	2	11	8		
Coca-Cola Company -Anaheim Water Plant	1-021392	2121 E. Winston Road Anaheim, CA 92806	312112	403.5(d)	1	6	1		
Columbine Associates	1-521784	4660 San Antonio Road Direction E. on B St Yorba Linda, CA 92886	211111	403.5(d)	2	9	2		
Continuous Coating Corporation	1-021290	520 W. Grove Ave. Orange, CA 92865	332812	433.17(a), 465.15	2	15	9		
Cooper and Brain, Inc.	1-031070	1390 Site Drive Brea, CA 92821	211111	403.5(d)	2	7	2		
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd. Buena Park, CA 90620	322211	403.5(d)	3	11	6	pH	
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave. Irvine, CA 92614	336310	433.17(a)	1	7	-	pH	New Class 1 Permit Issued on 10/01/2019
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave. Irvine, CA 92614	336310	403.5(d)	2	9	3		Previously listed as CP-Carrillo, Inc.
CPPG, Inc.	Z-321813	3911 E. Miraloma Ave. Anaheim, CA 92806	332813	433.17(a)	-	-	-		
Crest Coating, Inc.	1-021289	1361 S. Allec St. Anaheim, CA 92805	332812	433.17(a)	2	13	3		
CRH California Water, Inc.	1-011051	502 S. Lyon St. Santa Ana, CA 92701	561990	403.5(d)	1	1	2		
Custom Enamelers, Inc.	1-021297	18340 Mount Baldy Circle Fountain Valley, CA 92708	332812	433.17(a)	2	13	3		

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Cytec Engineered Materials, Inc.	Z-600005	1440 N. Kraemer Blvd. Anaheim, CA 92806	325520	433.17(a)	1	-	-		
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W. Garry Ave. Santa Ana, CA 92704	311821	403.5(d)	2	8	2		
Dae Shin USA, Inc.	1-031102	610 N. Gilbert St. Fullerton, CA 92833	313310	403.5(d)	2	11	6		
DAH Oil, LLC	1-581173	18962 Stewart Ln. Huntington Beach, CA 92648	211111	403.5(d)	1	9	2		
Darling International, Inc.	1-511378	2624 Hickory St. Santa Ana, CA 92707	562219	403.5(d)	3	13	6		
Data Aire, Inc. #2	1-021379	230 W. Blueridge Ave. Orange, CA 92865	332322	433.17(a)	3	11	3	pH	
Data Electronic Services, Inc.	1-011142	410 Nantucket Place Santa Ana, CA 92703	334412	433.17(a)	2	9	3		
Data Solder, Inc.	1-521761	2915 Kilson Drive Santa Ana, CA 92707	334412	433.17(a)	2	9	3		
Dayton Flavors, LLC	1-600038	580 S. Melrose 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		
Diamond Environmental Services, LP	1-600244	1801 Via Burton Unit B Fullerton, CA 92832	532490	403.5(d)	2	10	2		
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave. Fullerton, CA 92833	311930	403.5(d)	3	15	-	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	10	2		
Ducommun Aerostructures, Inc.	1-021105	1885 N. Batavia St. Orange, CA 92865	336413	433.17(a)	2	15	13		
Dunham Metal Processing	1-021325	936 N. Parker St. Orange, CA 92867	332813	433.17(a)	2	13	3		
E&B Natural Resources-Angus Petroleum Corporation	1-600254	1901 California St. Huntington Beach, CA 92648	211111	403.5(d)	2	10	4		

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Earth Friendly Products	1-600739	11150 Hope St. Cypress, CA 90630	325611	417.166, 417.86	1	7	4		New Class 1 Permit Issued on 07/01/2019
EFT Fast Quality Service, Inc.	1-011064	2328 S. Susan St. Santa Ana, CA 92704	334112	433.17(a)	2	9	2		
Electro Metal Finishing Corporation	1-021158	1194 N. Grove St. Anaheim, CA 92806	332812	433.17(a)	2	9	3		
Electrolurgy, Inc.	1-071162	1121 Duryea Ave. Irvine, CA 92614	332813	433.17(a)	3	12	30	Silver	
Electron Plating Inc.	1-021336	13932 Enterprise Drive Garden Grove, CA 92843	332813	433.17(a)	2	13	9		
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln. Brea, CA 92821	332813	433.17(a)	2	12	9		
Electrorack Products Co., Inc.	Z-321092	1443 S. Sunkist St. Anaheim, CA 92806	332999	433.17(a)	1	-	-		
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	15	7		
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	15	7		
Excello Circuits Manufacturing Corp.	1-521855	1924 Nancita Circle Placentia, CA 92870	334412	433.17(a)	2	13	27		
Expo Dyeing and Finishing, Inc.	1-031322	1365 Knollwood Circle Anaheim, CA 92801	313310	403.5(d)	2	11	6		
Fabrica International, Inc.	1-011278	3201 S. Susan St. Santa Ana, CA 92704	314110	428.46	2	8	6		
Fabrication Concepts Corporation	1-011068	1800 E. Saint Andrew Place Santa Ana, CA 92705	332114	433.17(a)	2	16	4		
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St. Brea, CA 92821-3134	334412	433.17(a)	2	13	3		
FMH Aerospace Corp.	1-600585	17072 Daimler St. Irvine, CA 92614	332912	433.17(a)	2	15	26		
Fullerton Custom Works, Inc.	Z-331424	1165 E. Elm Ave. Fullerton, CA 92831	332813	433.17(a)	2	-	-		
Gaffoglio Family Metalcrafters	1-600443	11161 Slater Ave. Fountain Valley, CA 92708	336111	426.66	2	8	1		
Gallade Chemical, Inc.	1-011257	1230 E. Saint Gertrude Place Santa Ana, CA 92707-3030	422690	403.5(d)	2	1	2		

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Gemini Industries, Inc.	1-071172	2311 Pullman St. Santa Ana, CA 92705	331492	415.24, 421.265(a)	2	18	9	Molybdenum	
General Container Corporation	1-031042	5450 Dodds Ave. Buena Park, CA 90621	322211	403.5(d)	2	6	2		
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave. Garden Grove, CA 92841	336413	403.5(d)	1	7	2		
Gomtech Electronics, Inc.	1-021352	990 N. Enterprise St. Unit M Orange, CA 92867	334412	433.17(a)	2	10	3		
Goodwin Company	1-031043	12361 Monarch St. Garden Grove, CA 92841	325611	403.5(d)	2	12	8		
Graphic Packaging International, Inc.	1-571314	1600 Barranca Parkway Irvine, CA 92606	322212	403.5(d)	2	9	2		
Hanson-Loran Co., Inc.	1-031107	6700 Caballero Blvd. Buena Park, CA 90620	325612	417.166, 417.176	2	13	2		
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave. Brea, CA 92821	336370	433.17(a)	2	2	9		
Harry's Dye & Wash, Inc.	1-521746	1015 E. Orangethorpe Ave. Anaheim, CA 92801	313310	403.5(d)	2	9	6		
Hartwell Corporation	1-021381	900 Richfield Road Placentia, CA 92870	332999	403.5(d)	2	3	4		
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Drive Seal Beach, CA 90740	211111	403.5(d)	2	11	4		
Hi Tech Solder	1-521790	700 Monroe Way Placentia, CA 92870	334412	433.17(a)	2	11	3		
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell Orange, CA 92865-3911	332813	433.17(a)	2	17	9		
Hixson Metal Finishing	1-061115	829 Production Place Newport Beach, CA 92663	332813	413.14(c), 413.14(g), 413.24(c), 413.24(g), 413.44(c), 413.44(g), 413.54(c), 413.54(g), 413.64(c), 413.64(g), 433.17(a)	3	18	33	Cadmium	

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House Foods America Corporation (East)	1-600906	7351 Orangewood Ave. Garden Grove, CA 92841	311991	403.5(d)	-	-	-		New Class 1 Permit Issued on 11/01/2019
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave. Garden Grove, CA 92841	311224	403.5(d)	2	7	6		Previously listed as House Foods America Corporation
Hyatt Die Casting & Engineering Corp.	Z-331236	4656 Lincoln Ave. Cypress, CA 90630	331523	464.15(a)	1	-	-		
Ideal Anodizing, Inc.	1-021041	1250 & 1270 N. Blue Gum St. Anaheim, CA 92806	332813	433.17(a)	2	13	3		
Ikon Powder Coating, Inc.	1-521756	1375 N. Miller St. Anaheim, CA 92806	332812	433.17(a)	2	9	3		
Image Technology, Inc.	1-521755	1380 N. Knollwood Circle Anaheim, CA 92801	325611	417.86	1	4	1		
Imperial Plating	1-031106	2007 Raymer Ave. Suite N Fullerton, CA 92833	332813	433.17(a)	2	10	23		
Imuraya USA, Inc.	1-541178	2502 Barranca Parkway Irvine, CA 92606	311520	403.5(d)	2	7	2		
Independent Forge Company	1-021401	692 N. Batavia St. Orange, CA 92868	332112	467.45	1	-	-		Class 1 Permit Deactivated on 09/30/2019
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	3	2		
Integral Aerospace, LLC	1-600243	2036 E. Dyer Road Santa Ana, CA 92705	336413	433.17(a)	2	11	9		
International Paper Company (Anaheim)	1-521820	601 E. Ball Road Anaheim, CA 92805	322211	403.5(d)	2	12	3		
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave. Buena Park, CA 90620	322224	403.5(d)	2	7	3		
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave. Buena Park, CA 90620	322211	403.5(d)	1	3	2		

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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	3		
J & R Metal Finishing Co.	1-521823	307 N. Euclid Way Building H1 Anaheim, CA 92801	332812	403.5(d)	2	10	3		
J&J Marine Aquisitions, LLC	1-551152	151 Shipyard Way Unit 7 Newport Beach, CA 92663	336611	403.5(d)	2	2	3		
JD Processing, Inc.	1-511407	2220 Cape Cod Way Santa Ana, CA 92703	332813	433.17(a)	2	13	9		
Jellco Container, Inc.	1-021402	1151 N. Tustin Ave. Anaheim, CA 92807	322212	403.5(d)	2	9	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 Los Alamitos, CA 90720	928110	403.5(d)	2	14	-		
Kanstul Musical Instruments	Z-321800	1332 Claudina St. Anaheim, CA 92805	339992	433.17(a)	-	-	-		
Kenlen Specialities, Inc.	1-021171	11691 Coley River Circle Fountain Valley, CA 92708	332812	433.17(a)	2	14	3		
Kimberly Clark Worldwide Inc., Fullerton Mill	1-021425	2001 E. Orangethorpe Fullerton, CA 92831	322121	430.127	3	15	6		
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N. Anaheim 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 Road Irvine, CA 92614	311941	403.5(d)	2	11	3		
Kryler Corporation	1-021428	1217 E. Ash Ave. Fullerton, CA 92831	332813	413.14(b), 413.14(f), 433.17(a)	2	17	4		

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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)	2	10	6		
La Habra Plating Co., Inc.	Z-331399	900 S. Cypress La Habra, CA 90631	332813	433.17(a)	1	-	-		
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln. Huntington Beach, CA 92647	334412	433.17(a)	2	11	3		
Linco Industries, Inc.	1-021253	528 S. Central Park Ave. Direction West Anaheim, CA 92802	332812	403.5(d)	2	16	7	Zinc	
LM Chrome Corporation	1-511361	654 Young St. Santa Ana, CA 92705	332813	433.17(a)	3	16	14		
Logi Graphics, Inc.	1-031049	17592 Metzler Ln. Huntington Beach, CA 92647	334412	433.17(a)	2	15	1		
M.S. Bellows	1-111007	5322 Mcfadden Ave. Huntington Beach, CA 92649	332813	433.17(a)	2	11	3		
Magma Finishing Corp.	Z-321810	2294 N. Batavia St. Suite D Orange, CA 92865	332813	433.17(a)	1	-	-		
Magnetic Metals Corporation	1-531391	2475 W. La Palma Ave. Anaheim, CA 92801	335311	433.17(a)	2	10	3		
Manufactured Packaging Products	1-521793	3200 Enterprise St. Brea, CA 92821	322211	403.5(d)	2	9	1		
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E. Rosslynn Ave. Fullerton, CA 92831	322211	403.5(d)	2	7	2		
Markland Manufacturing, Inc.	1-011046	1111 E. Mcfadden Ave. Santa Ana, CA 92705	332813	433.17(a)	2	13	14		
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave. Irvine, CA 92606	311824	403.5(d)	2	4	2		
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Road Irvine, CA 92618	311824	403.5(d)	2	4	4		
Marukome USA, Inc.	1-141023	17132 Pullman St. Irvine, CA 92614	311991	403.5(d)	3	9	2		

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Master Wash, Inc.	1-511399	3120 Kilson St. Santa Ana, CA 92707	811192	403.5(d)	2	3	2		
Mckenna Labs, Inc.	1-021422	1601 E. Orangethorpe Ave. Fullerton, CA 92831	325620	417.86	2	7	2		
MCP Foods, Inc.	1-021029	424 S. Atchison St. Anaheim, CA 92805	311942	403.5(d)	2	10	6		
Meggitt, Inc.	1-600006	14600 Myford Road Irvine, CA 92606	334519	433.17(a)	3	9	3	Lead	
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	10	4		
Micrometals, Inc.	1-021153	5615 E. La Palma Ave. Anaheim, CA 92807	334416	471.105(e)	2	12	3		
Murrietta Circuits	1-521811	5000 E. Landon St. Anaheim, CA 92807	334412	433.17(a)	2	13	3		
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln. Placentia, CA 92870	561990	403.5(d)	2	9	2		Previously listed as Nalco Water Pretreatment Systems Solutions, LLC
National Construction Rentals	1-600652	1550 E. Chestnut Ave. Santa Ana, CA 92701	562991	403.5(d)	3	12	3	pH	
Neutron Plating, Inc.	Z-321812	2993 E. Blue Star St. Anaheim, CA 92806	332812	433.17(a)	1	-	-		
Neutronic Stamping and Plating	1-521772	10535 Lawson River Ave. Fountain Valley, CA 92708	334417	433.17(a)	2	9	3		
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln. Huntington Beach, CA 92647	325211	-	1	-	-		New Class 1 Permit Issued on 10/01/2019
Newport Corporation	1-071038	1791 Deere Ave. Irvine, CA 92606	334516	403.5(d)	2	6	1		
Newport Fab, LLC (dba TowerJazz Semiconductor)	1-571292	4321 Jamboree Road Newport Beach, CA 92660	334413	469.18(a)	2	12	-		Previously listed as Jazz Semiconductor
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Parkway Yorba Linda, CA 92887	339114	433.17(a)	2	9	2		

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Nor-Cal Beverage Co., Inc. (Main)	1-021284	1226 N. Olive St. Anaheim, CA 92801	312111	403.5(d)	2	11	6		
Nor-Cal Beverage Co., Inc. (NCB)	1-021283	1226 N. Olive St. Anaheim, CA 92801	312111	403.5(d)	2	11	6		
Nu-Tec Powder Coating	Z-321383	2990 E. Blue Star St. Anaheim, CA 92806	332812	433.17(a)	1	-	-		
O'Donnell Oil Company, LLC	1-581191	7800 Palin Circle Huntington Beach, CA 92648	211111	403.5(d)	2	8	1		
O.C. Waste & Recycling	1-141018	20661 Newport Coast Drive Newport Beach, CA 92657	562910	403.5(d)	2	10	2		
Oakley, Inc.	1-141012	1 Icon Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	2	-	-		
Omni Metal Finishing, Inc.	1-021520	11665 Coley River Circle Fountain Valley, CA 92708	332813	433.17(a)	3	13	9		
Orange County Chemical Supply, Inc.	1-600766	10680 Fern Ave. Stanton, CA 90680	325611	417.86	2	12	2		
Pacific Chrome Services	Z-311396	603 E. Alton Ave. Suite F Santa Ana, CA 92705	332813	433.17(a)	2	-	-		
Pacific Image Technology, Inc.	1-021070	1875 S. Santa Cruz St. Anaheim, CA 92805	334112	433.17(a)	2	13	3		
Pacific Western Container	1-511371	4044 W. Garry Ave. Santa Ana, CA 92704	322211	403.5(d)	2	6	4		
Parker Hannifin Corporation	1-141002	14300 Alton Parkway Irvine, CA 92618-1898	332912	433.17(a)	2	-	-		Class 1 Permit Deactivated on 11/30/2019
Parker Hannifin Corporation	Z-600979	14300 Alton Parkway Irvine, CA 92618-1898	332912	433.17(a)	2	-	-		New Zero Discharge Certification Issued on 12/01/2019
Patio and Door Outlet, Inc.	1-521783	410 W. Fletcher Ave. Orange, CA 92865	332812	433.17(a)	2	13	-		
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W. Freedom Ave. Orange, CA 92865	562219	437.47(b)	2	15	24		
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W. Freedom Ave. Orange, CA 92865	562219	403.5(d)	2	9	8		

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Performance Powder, Inc.	1-521805	2920 E. La Jolla St. Anaheim, CA 92806	332812	433.17(a)	2	13	3		
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)	3	17	9		
Platinum Surface Coating, Inc.	1-521852	1173 N. Fountain Way Anaheim, CA 92806	332813	433.17(a)	2	9	4		
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way Placentia, CA 92870	211111	403.5(d)	2	7	2		
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St. Yorba Linda, CA 92886	211111	403.5(d)	1	4	2		
Porter Powder Coating	Z-321817	514 S. Rose St. Anaheim, CA 92805	332813	433.17(a)	-	-	-		
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	800 N. State College Blvd. Fullerton, CA 92831	332812	433.17(a)	2	9	3		
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N. Euclid Way Building J Anaheim, CA 92801	332812	433.17(a)	2	9	3		
Power Distribution, Inc.	1-511400	4011 W. Carriage Drive Santa Ana, CA 92704	335311	403.5(d)	2	11	2		
Powerdrive Oil & Gas Company, LLC (16th)	1-600246	613 16th St. Huntington Beach, CA 92648	211111	403.5(d)	2	-	-		
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	120 2nd St. Huntington Beach, CA 92648	211111	403.5(d)	2	6	1		
Powerdrive Oil & Gas Company, LLC (Surveyor)	1-600245	21632 Surveyor Circle Huntington Beach, CA 92646	211111	403.5(d)	2	-	-		
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave. Santa Ana, CA 92707	332813	433.17(a)	2	17	3		
Precision Anodizing & Plating, Inc.	1-521809	1601 N. Miller St. Anaheim, CA 92806	332813	433.17(a)	2	13	9		

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Precision Circuits West, Inc.	1-011008	3310 W. Harvard St. Santa Ana, CA 92704-3920	334412	433.17(a)	2	15	3		
Precision Resource, California Division	1-111002	5803 Engineer St. Huntington Beach, CA 92649	332710	403.5(d)	2	12	4		
Precon, Inc.	1-021581	3131 E. La Palma Ave. Anaheim, CA 92806	332721	403.5(d)	2	31	11		
Prima-Tex Industries Inc.	1-031036	6237 Descanso Circle Buena Park, CA 90620	313310	403.5(d)	2	10	3		
Prudential Overall Supply	1-071235	16901 Aston St. Irvine, CA 92606	812332	403.5(d)	2	12	4		
Pulmuone Wildwood, Inc.	1-531397	2315 Moore Ave. Fullerton, CA 92833	311991	403.5(d)	2	11	6		
Q-Flex Inc.	1-600337	1301 E. Hunter Ave. Santa Ana, CA 92705	334418	433.17(a)	2	14	5		
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N. Cypress St. Orange, CA 92867	332112	467.45	3	13	2		
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N. Cypress St. Orange, CA 92867-6606	332112	467.46	2	14	2		
Quikturn Professional Screenprinting	1-521858	567 S. Melrose St. Placentia, CA 92870	333249	403.5(d)	2	9	2		
Rayne Dealership Corporation	1-571303	17835 Sky Park Circle Suite M Irvine, CA 92614	454390	403.5(d)	2	9	1		
RBC Transport Dynamics Corp.	1-011013	3131 W. Segerstrom Ave. Santa Ana, CA 92704	336413	433.17(a)	2	8	2		
Reid Metal Finishing	1-511376	3110 W. Harvard St. Santa Ana, CA 92704	332813	433.17(a)	2	12	14		
Remora Operating CA, LLC	1-581192	219 1st St. Huntington Beach, CA 92648	211111	403.5(d)	2	11	2		
Republic Waste Services	1-521827	2727 Coronado St. Anaheim, CA 92806	56211	403.5(d)	4	20	4	Chromium, Copper, Lead, Nickel, Zinc	
Republic Waste Services of So. Cal., LLC	1-021169	1235 N. Blue Gum St. Anaheim, CA 92806	562111	403.5(d)	2	11	3		

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Rich Products Corporation (South)	1-511404	3401 W. Segerstrom Ave. Santa Ana, CA 92704	311812	403.5(d)	2	7	2		Previously listed as Rich Products Corporation
Rigiflex Technology, Inc.	1-021187	1166 N. Grove St. Anaheim, CA 92806	334418	433.17(a)	2	9	3		
Robinson Pharma, Inc. (Croddy)	1-511413	2632 S. Croddy Way Santa Ana, CA 92704	325411	439.47	2	-	-		
Robinson Pharma, Inc. (Harbor North)	1-600126	2811 S. Harbor Blvd. Santa Ana, CA 92704	325412	439.47	2	12	11		
Robinson Pharma, Inc. (Harbor South)	1-511412	3330 S. Harbor Blvd. Santa Ana, CA 92704	325412	439.47	2	12	11		
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		
Roto-Die Company, Inc.	1-021033	712 N. Valley St. Suite B Anaheim, CA 92801	332710	433.17(a)	2	13	3		
Rountree / Wright Enterprises, LLC	1-111028	114 14th St. Lot / Block 12&14/113 Huntington Beach, CA 92648	211111	403.5(d)	2	9	2		
S & C Oil Co., Inc.	1-581175	18742 Goldenwest St. Huntington Beach, CA 92649	211111	403.5(d)	2	10	2		
Safran Electronics & Defense, Avionics USA, LLC.	1-571304	3184 Pullman St. Costa Mesa, CA 92626	335931	433.17(a)	2	15	8		
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave. Costa Mesa, CA 92626	334412	433.17(a)	2	23	9		
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave. Costa Mesa, CA 92626	334412	433.17(a)	2	19	9		
Santana Services	1-021016	1224 E. Ash Ave. Fullerton, CA 92831	332813	433.17(a)	2	9	3		
Schreiber Foods, Inc.	1-021049	1901 Via Burton Fullerton, CA 92831	311511	403.5(d)	2	7	6		
Scientific Spray Finishes, Inc.	1-031311	315 S. Richman Ave. Fullerton, CA 92832	332812	433.17(a)	2	13	3		

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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)	2	-	5		
SFPP, LP	1-021619	1350 N. Main St. Orange, CA 92867	493190	403.5(d)	1	-	-		
Shepard Bros., Inc.	1-031034	503 S. Cypress St. La Habra, CA 90631	325611	417.166, 417.176	2	11	2		
Shur-Lok Company	1-600297	2541 White Road Irvine, CA 92614	332722	433.17(a)	2	-	-		
Simply Fresh, LLC	1-600709	6535 Caballero Blvd. Buena Park, CA 90620	311421	403.5(d)	2	7	6		
Sirco Industrial, Inc.	1-600706	5312 System Drive Huntington Beach, CA 92649	423830	403.5(d)	2	10	4		
Soldermask, Inc.	1-031341	17905 Metzler Ln. Huntington Beach, CA 92647	334412	433.17(a)	2	13	9		
South Coast Baking, LLC	1-600565	1711 Kettering St. Irvine, CA 92614-5615	311821	403.5(d)	2	10	2		
South Coast Circuits, Inc. (Bldg 3500 A)	1-011069	3500 W. Lake Center Drive Building A Santa Ana, CA 92704	334412	433.17(a)	2	13	9		
South Coast Circuits, Inc. (Bldg 3506 A)	1-011030	3506 W. Lake Center Drive Building A Santa Ana, CA 92704	334412	433.17(a)	2	12	3		
South Coast Circuits, Inc. (Bldg 3512 A)	1-511365	3512 W. Lake Center Drive Building A Santa Ana, CA 92704	334412	433.17(a)	2	13	9		
South Coast Circuits, Inc. (Bldg 3524 A)	1-011054	3524 W. Lake Center Drive Building A Santa Ana, CA 92704	334412	433.17(a)	2	13	3		
South Coast Water	1-511405	401 S. Santa Fe St. Santa Ana, CA 92705	333318	403.5(d)	2	9	2		
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln. Westminster, CA 92683	811310	403.5(d)	1	4	1		

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Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln. Westminster, CA 92683	811310	403.5(d)	-	4	1		
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln. Westminster, CA 92683	811310	403.5(d)	1	-	1		
Spectrum Paint And Powder, Inc.	Z-321822	1332 S. Allec St. Anaheim, CA 92805	332812	433.17(a)	1	-	-		
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way Placentia, CA 92870	332710	403.5(d)	1	7	-		New Class 1 Permit Issued on 09/23/2019
SPS Technologies	1-011310	2701 S. Harbor Blvd. Santa Ana, CA 92704	332722	433.17(a), 471.34(a)	2	14	9		Class 1 Permit Deactivated on 10/31/2019
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E. Warner Ave. Santa Ana, CA 92705	332722	433.17(a), 467.46, 471.34(a), 471.65(a)	2	17	15		Previously listed as Cherry Aerospace
Stainless Micro-Polish, Inc.	1-021672	1286 N. Grove St. Anaheim, CA 92806	332813	433.17(a)	2	22	3		
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W. Collins Ave. Orange, CA 92867	332119	403.5(d)	3	10	6	O&G min.	
Star Powder Coating, Inc.	1-531425	7601 Park Ave. Garden Grove, CA 92841	332812	433.17(a)	2	13	3		
Statek Corporation (Main)	1-021664	512 N. Main St. Orange, CA 92868	334419	469.26(a)	2	10	2		
Statek Corporation (Orange Grove)	1-521777	1449 W. Orange Grove Ave. Unit B Orange, CA 92868	334419	469.28(a)	2	10	-		
Stepan Company	1-021674	1208 N. Patt St. Anaheim, CA 92801	325613	417.106, 417.96	2	10	4		
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave. Santa Ana, CA 92703-1310	311511	403.5(d)	2	15	6	pH	
Summit Interconnect, Inc.	1-600012	223 N. Crescent Way Anaheim, CA 92801	334412	433.17(a)	2	15	8		
Summit Interconnect, Inc., Orange Division	1-600060	230 W. Bristol Ln. Orange, CA 92865	334412	433.17(a)	2	15	9		
Sunny Delight Beverages Co.	1-021045	1230 N. Tustin Ave. Anaheim, CA 92807	312111	403.5(d)	2	7	6		
Superior Plating	1-021090	1901 E. Cerritos Ave. Anaheim, CA 92805	332813	433.17(a)	3	13	19	CN	

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Superior Processing	1-021403	1115 Las Brisas Place Placentia, CA 92870	334412	433.17(a)	3	18	3	Nickel	
Tayco Engineering, Inc.	1-031012	10874 Hope St. Cypress, CA 90630	334513	433.17(a)	2	9	3		
Taylor-Dunn Manufacturing Company	1-021123	2114 Ball Road Anaheim, CA 92804	333924	433.17(a)	2	12	2		
Teva Parenteral Medicines, Inc.	1-141007	19 Hughes Irvine, CA 92618	325412	439.47	2	7	5		
Thermal-Vac Technology, Inc.	1-021282	1221 W. Struck Ave. Orange, CA 92867	332410	433.17(a)	2	11	8		
Thompson Energy Resources, LLC	1-521773	3351 E. Birch St. Brea, CA 92821-6251	211111	403.5(d)	4	25	3	O&G min.	
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Drive 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	9		
Toyota Racing Development	1-071059	335 Baker St. Costa Mesa, CA 92626	336310	403.5(d)	2	9	10		
Transline Technology, Inc.	1-021202	1106 S. Technology Circle Anaheim, CA 92805	334412	433.17(a)	2	13	3		
Tropitone Furniture Co., Inc.	1-141163	5 Marconi Irvine, CA 92618	337124	433.17(a)	2	15	4		
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St. Anaheim, CA 92806	334412	433.17(a)	2	14	8		
TTM Technologies North America, LLC. (Croddy)	1-511366	2645 Croddy Way Santa Ana, CA 92704	334412	433.17(a)	2	18	8		
TTM Technologies North America, LLC. (Harbor)	1-511359	2640 S. Harbor Blvd. Santa Ana, CA 92704	334412	433.17(a)	2	17	8		
Ultra-Pure Metal Finishing, Inc.	1-021703	1764 N. Case St. Orange, CA 92865	332813	433.17(a)	2	13	9		
United Pharma, LLC	1-531418	2317 Moore Ave. Fullerton, CA 92833	325412	403.5(d)	3	12	2		
Universal Alloy Corp.	1-021706	2871 La Mesa Ave. Anaheim, CA 92806	331318	467.35(c)	2	12	5		
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave. Fullerton, CA 92831	332812	433.17(a)	2	15	2		

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Facility Name	Permit No.	Physical Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	Comment
UOP, LLC	1-521751	2100 E. Orangethorpe Ave. Anaheim, CA 92806	326113	403.5(d)	2	6	2		Class 1 Permit Deactivated on 12/18/2019
Van Law Food Products, Inc.	1-600810	2325 Moore Ave. Fullerton, CA 92833	311941	403.5(d)	2	12	6		
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St. Anaheim, CA 92806	562920	403.5(d)	2	7	1		
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave. Tustin, CA 92780	325411	439.47	3	16	7		
Weber Precision Graphics	1-011354	2730 Shannon St. Santa Ana, CA 92704	323113	403.5(d)	2	6	2		
Weidemann Water Conditioners, Inc.	1-021653	1702 E. Rosslynn Ave. Fullerton, CA 92831-5111	333318	403.5(d)	2	7	2		
West Newport Oil Company	1-061110	1080 W. 17th St. Costa Mesa, CA 92627	211111	403.5(d)	2	14	8		
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Road Placentia, CA 92870	211111	403.5(d)	2	10	2		
Winonics (Brea)	1-031035	660 N. Puente St. Brea, CA 92821	334412	433.17(a)	2	15	3		
Winonics, Inc.	1-021735	1257 State College Blvd. Fullerton, CA 92831	334412	433.17(a)	2	9	9		
Yakult USA, Inc.	1-521850	17235 Newhope St. Fountain Valley, CA 92708	311511	403.5(d)	2	7	6		

ORANGE COUNTY SANITATION DISTRICT

RESOURCE PROTECTION DIVISION

SAWPA MONITORING AND COMPLIANCE STATUS REPORT

APPENDIX 2

1st and 2nd Quarters

FISCAL YEAR 2019/2020

Santa Ana Watershed Project Authority (SAWPA) July 1, 2019 - December 31, 2019
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	WMWD	Direct	D1074-3.1	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	2	4	2			
Aramark Uniform & Career Apparel, LLC	WMWD	Direct	D1004-1	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	1	7	5			New Permit Issued 10/29/2019
C.C. Graber Company	IEUA	Indirect	I1005-2.1	315 E. 4th Street Ontario, CA 91764	311421	CIU	407.64	-	1	0	0			Permit Closed 8/22/2019
California Institution for Men	IEUA	Direct	D1006-3	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	2	7	14			
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 Colton - Agua Mansa Power Plant	VALLEY	Direct	D1002-4	2040 W. Agua Mansa Road Colton, CA 92324	221122	SIU	403.5(d)	-	1	8	10			
City of Corona Ion Exchange Treatment Plant	WMWD	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	WMWD	Direct - Emergency	E1013-2.1	2205 Railroad Street Corona, CA 92880	221320	SIU	403.5(d)	-	0	0	0			
Dart Container Corporation	WMWD	Direct	D1019-3	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	2	12	2			
Del Real, LLC	JCSD	Direct	D1021-3	11041 Inland Avenue Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	3	17	14			
EMWD Collection Station	SAWPA	Direct	D1055-2.2	29541 Murrieta Road Menifee, CA 92586	221320	SIU	403.5(d)	-	1	2	2			Permit Closed 11/5/2019
EMWD Energy Dissipater	SAWPA	Direct - Emergency	E1068-2.1	636 Minthorn Street Lake Elsinore, CA 92530	221320	SIU	403.5(d)	-	1	0	0			
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)	-	1	0	0			
IEUA Collection Station	SAWPA	Direct	D1035-3.1	16400 El Prado Road Chino, CA 91710	221320	SIU	403.5(d)	-	1	2	0			Permit Closed 11/5/2019
IEUA Los Serranos	SAWPA	Direct - Emergency	E1037-2.1	6075 Kimball Avenue Chino, CA 91708	221320	SIU	403.5(d)	-	1	0	0			
Infineon Technologies Americas Corporation	EMWD	Indirect	I1039-3	41915 Business Park Drive Temecula, CA 92590	334413	CIU	469.18	Y	2	4	4			
Inland Empire Energy Center	EMWD	Direct	D1036-3	26226 Antelope Road Menifee, CA 92585	221112	CIU	423.17	-	2	11	10			
JCSD Archibald Metering Station	SAWPA	Direct - Emergency	E1041-2.1	6990 Archibald Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	0			
JCSD Celebration Metering Station	SAWPA	Direct - Emergency	E1042-2.1	5972 Hamner Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	0			
JCSD Chandler Lift Station	SAWPA	Direct - Emergency	E1043-2.1	14087 Chandler Street Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	6			
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-4	Etiwanda Avenue and N. of Bellegrave Avenue	221320	SIU	403.5(d)	-	2	16	8			
JCSD Hamner Lift Station	SAWPA	Direct - Emergency	E1046-2.3	7302 Hamner Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	0			
JCSD Hamner Metering Station	SAWPA	Direct	D1045-4	5410 Hamner Avenue Eastvale, CA 91752	221320	SIU	403.5(d)	-	2	7	10			
JCSD Harrison Metering Station	SAWPA	Direct - Emergency	E1047-2.3	6998 Harrison Avenue Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	0			
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)	-	2	0	5			
JCSD Scholar Way Metering Station	SAWPA	Direct - Emergency	E1113-1.1	6980 Scholar Way Eastvale, CA 92880	221320	SIU	403.5(d)	-	1	0	0			
JCSD Wineville Metering Station	SAWPA	Direct	D1048-4	5101 Wineville Avenue Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	2	8	8			
JSCD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-3.1	3474 De Forest Circle Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	6	5			
Metal Container Corporation	JCSD	Direct	D1056-3	10980 Inland Avenue Jurupa Valley, CA 91752	332431	CIU	465.45(d)	-	2	16	12			

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
Mission Linen Supply	IEUA	Direct	D1057-3.1	5400 Alton Street Chino, CA 91710	812332	SIU	403.5(d)	-	2	24	21			
Mountainview Generating Station	VALLEY	Direct	D1058-2	2492 W. San Bernardino Ave. Redlands, CA 92374	221112	CIU	423.17	-	2	11	12			
OLS Energy - Chino	IEUA	Direct	D1059-3	5601 Eucalyptus Avenue Chino, CA 91710	221112	CIU	423.17	-	2	17	28			
Rayne Water Conditioning	SBMWD	Indirect	I1066-2.1	939 W. Reece Street San Bernadino, CA 92411	561990	SIU	403.5(d)	-	3	13	4			
Repet, Inc.	IEUA	Direct	D1069-3.1	14207 Monte Vista Avenue Chino, CA 91710	423930	SIU	403.5(d)	-	2	19	19			
SBMWD Collection Station	SAWPA	Direct	D1076-3.1	399 Chandler Place San Bernardino, CA 92408	221310	SIU	403.5(d)	-	1	2	2			Permit Closed 11/5/2019
SBMWD Water Reclamation Plant	SAWPA	Direct - Emergency	E1075-2.2	399 Chandler Place San Bernardino, CA 92408	221320	SIU	403.5(d)	-	1	0	0			
ShawCor Pipe Protection, LLC	IEUA	Indirect	I1077-3	14000 San Bernardino Ave. Fontana, CA 92335	332812	CIU	433.17	-	2	5	12			
Stringfellow Pretreatment Facility	SAWPA	Direct	D1079-3	3400 Pyrite Street Jurupa Valley, CA 92509	562910	SIU	403.5(d)	-	2	16	137			
Temescal Desalter	WMWD	Direct	D1012-3	755 Public Safety Way Corona, CA 92880	221310	SIU	403.5(d)	-	2	4	2			
WMWD Arlington Desalter	SAWPA	Direct	D1088-4	11611 Sterling Avenue Riverside, CA 92503	221310	SIU	403.5(d)	-	2	4	2			
WMWD Collection Station	SAWPA	Direct	D1087-3.1	2205 Railroad Street Corona, CA 92880	221320	SIU	403.5(d)	-	1	2	0			Permit Closed 11/5/2019
WRCRWA South Regional Pumping Station	SAWPA	Direct - Emergency	E1089-2.1	671 N. Lincoln Avenue Corona, CA 92883	221320	SIU	403.5(d)	-	1	0	0			
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-3	880 W. County Line Road Calimesa, CA 92320	221320	SIU	403.5(d)	-	2	4	4			