

Pretreatment Program Update

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Administration Committee
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Outline




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

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Background




**HUMAN
WASTEWATER**


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**INDUSTRIAL
WASTEWATER**




METALS




ORGANIC
CHEMICALS




CYANIDE



OILS AND
GREASE



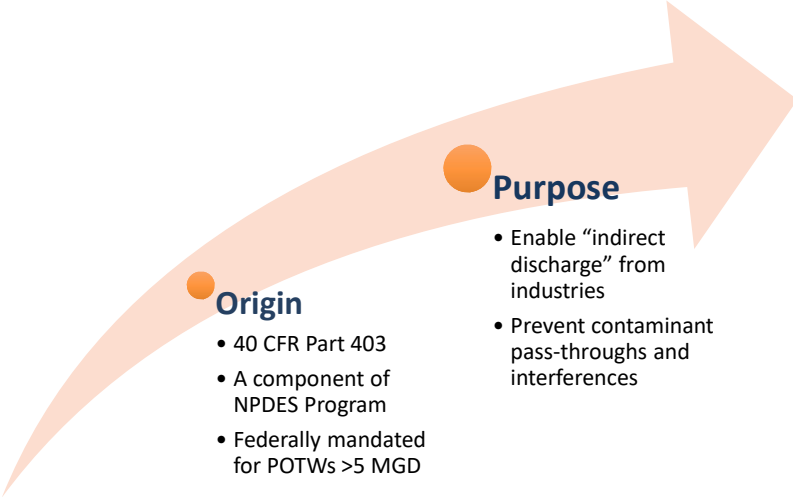
PESTICIDES



SOLVENTS

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Program Overview



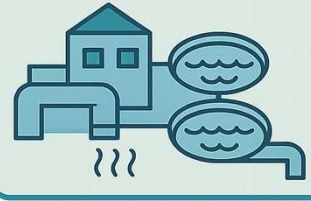
Origin

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

Purpose

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

**PRETREATMENT
PROGRAM**



NO TOXICS
IN TOXIC AMOUNTS

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Industrial Discharge to OC San



Diverse and large number of industries in service area



Approximately 12 percent of total flow

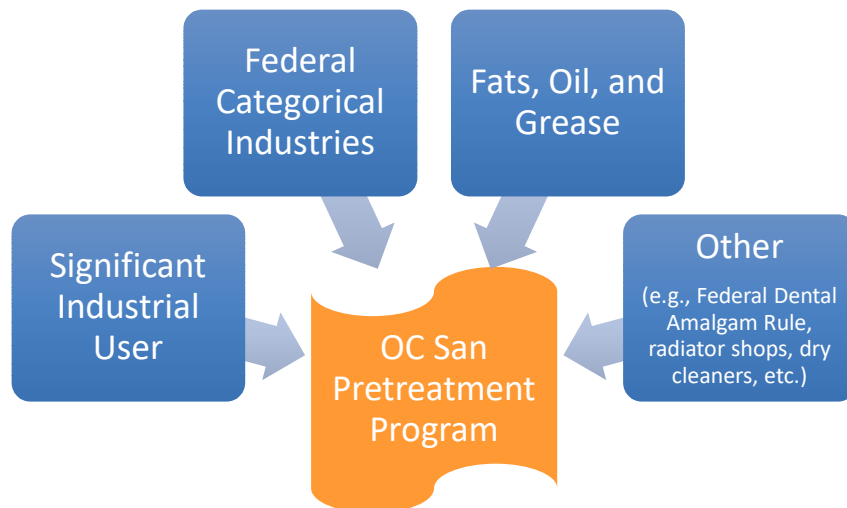


Over 500 facilities currently permitted



On-site treatment required before discharge

Program Components



Protecting Collection System

The diagram shows a dark blue sewer pipe system with several components labeled with their respective pollutants:

- FLAMMABLES**: Represented by a yellow diamond-shaped warning sign with a flame icon and wavy lines above it.
- HIGH TEMPERATURE**: Represented by a yellow thermometer icon.
- Toxic Chemicals**: Represented by a green triangular warning sign with a skull and crossbones.
- pH Extremes**: Represented by a circular gauge icon with a needle.
- Sediment**: Represented by a pile of yellow sand and a blue pan with orange residue.
- Fats, Oil, and Grease**: Represented by a blue pan with orange residue.

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Protecting Treatment System

Microorganisms are Key to Secondary Treatment

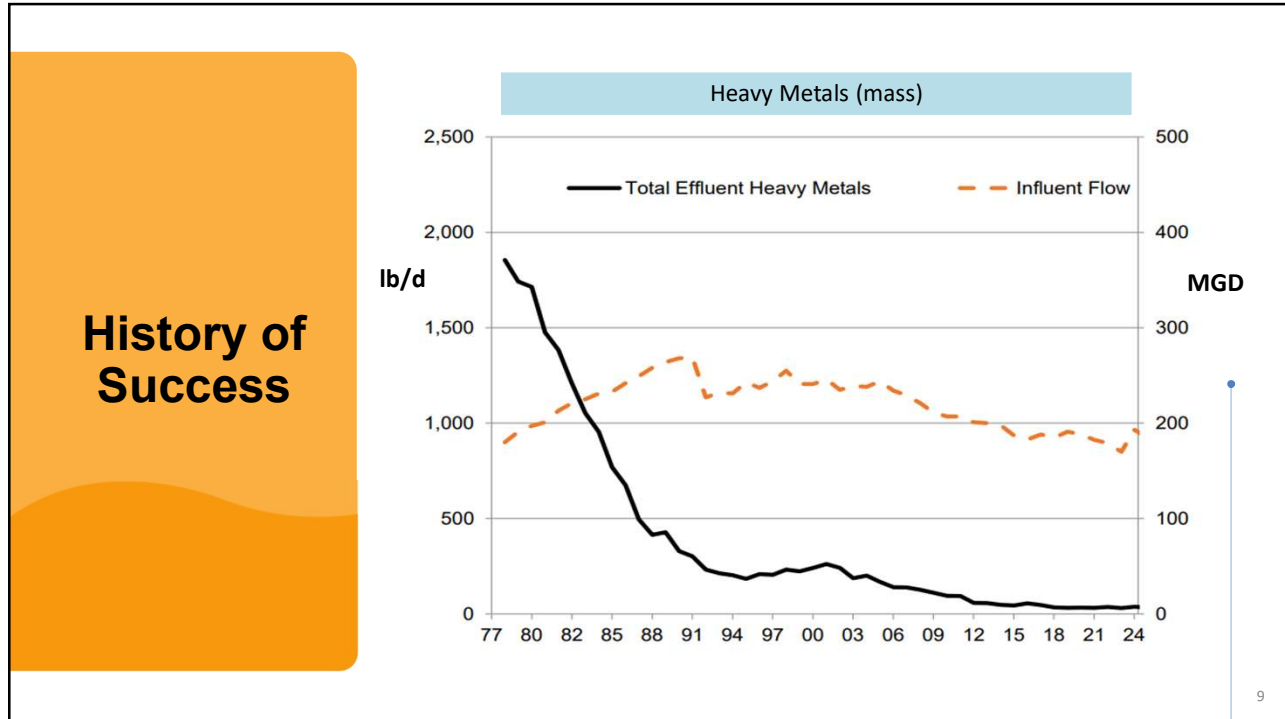
The diagram illustrates three stages of wastewater treatment:

- ACTIVATED SLUDGE**: A rectangular tank containing water with wavy lines representing microorganisms and a horizontal bar at the bottom.
- TRICKLING FILTER**: A cylindrical tank with a central vertical pipe and a horizontal bar at the top, with water dripping down over a filter bed.
- ANAEROBIC DIGESTERS**: Two cylindrical tanks with rounded ends. The right tank has an upward-pointing arrow labeled **BIOGAS** above it.

...and to Biosolids

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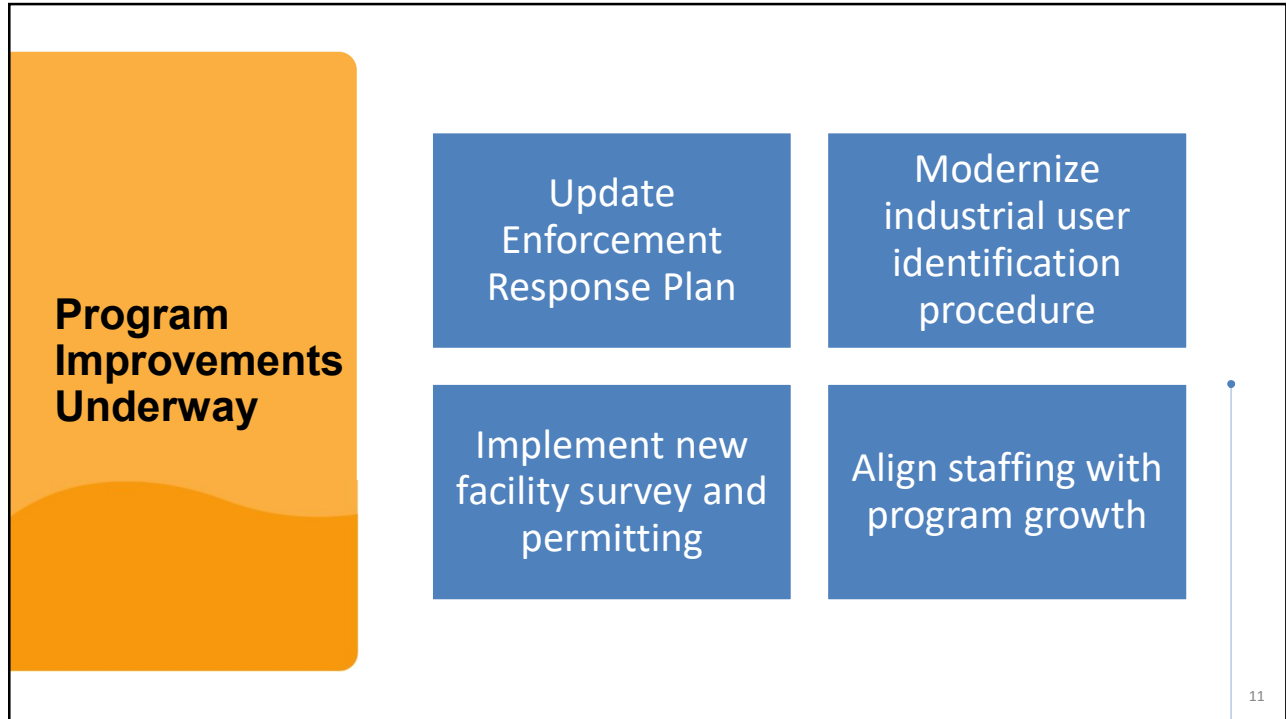


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Regulatory Drivers for Updates

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

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Program Improvements Underway

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

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Enforcement Response Plan Update

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

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Modernizing Industrial User Identification

Current process inefficient and incomplete

Search using GIS-based business analytic tools

>300 potential additional categorical industries found

Thousands more potential users detected

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Expand Industrial Facility Surveys

Survey newly identified facilities

Determine permit requirements

Ensure compliance with federal mandates

Ensure equity among dischargers and compliance with Prop. 218

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Staffing and Program Growth



Increased inspections, permitting, monitoring, sample analysis



Additional permit engineers, inspectors, laboratory scientists



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

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Summary



Program evolving to meet regulatory requirements



Improvements: ERP, analytics, surveys



Plan ensures compliance and system protection



Future Board items

- Staffing
- ERP

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Recommendation

Informational Item.