

# **Orange County Sanitation District Pretreatment Program Semi-Annual Report**

**July – December 2023**



**POTW PRETREATMENT PROGRAM SEMI-ANNUAL REPORT  
CERTIFICATION STATEMENT**

---

NPDES Permit Holder: Orange County Sanitation District  
Report Due Date: March 31, 2024  
Period Covered by this Report: July 2023 through December 2023  
Period Covered by Previous Report: July 2022 through June 2023\*  
Name of Wastewater Treatment Plant(s): Reclamation Plant No. 1 and Treatment Plant No. 2  
NPDES Permit Number: CA0110604

Person to contact concerning information contained in this report:

- Name: Mark Kawamoto, P.E.
- Title: Environmental Protection Manager, Resource Protection Division
- Mailing Address: 10844 Ellis Avenue  
Fountain Valley, CA 92708-7018
- Telephone: (714) 593-7424

*"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."*

March 28, 2024

Date



Mark Kawamoto, P.E.  
Environmental Protection Manager, Resource Protection  
Division

March 28, 2024

Jayne Joy, Executive Officer  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Subject: Board Order No. R8-2021-0010, NPDES No. CA0110604  
Pretreatment Program Semi-Annual Report for the Period of  
July 1 through December 31, 2023

---

The Orange County Sanitation District (OC San) is submitting this semi-annual report for permitting and enforcement activities conducted during the period of July 1 through December 31, 2023. These activities include inspection and sampling of permittees, enforcement actions OC San has taken to remedy noncompliance, and information on the Santa Ana Watershed Project Authority Pretreatment Program under OC San's jurisdiction.

Appendix 1 of this report, entitled *Monitoring and Compliance Status Report*, contains the number of industrial inspections and the number of OC San and self-monitoring samples for each OC San Class I permittee for the first and second quarters of Fiscal Year 2023/24.

If you or your staff have any questions, please contact me at your convenience at (714) 593-7424.



Mark Kawamoto, P.E.  
Environmental Protection Manager, Resource Protection Division

JAD:

c: EPA Region 9, CWA Compliance Officer  
SWRCB, Pretreatment Program Manager  
Submitted electronically to [ciwqs.waterboards.ca.gov](mailto:ciwqs.waterboards.ca.gov),  
[R9pretreatment@epa.gov](mailto:R9pretreatment@epa.gov), and [NPDES\\_Wastewater@waterboards.ca.gov](mailto:NPDES_Wastewater@waterboards.ca.gov)

Serving:

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

## Table of Contents

List of Tables .....	i
List of Appendices .....	i
List of Abbreviations .....	ii
Glossary of Defined Terms .....	iv
1.0 Permits and Certification .....	1-1
1.1 Introduction.....	1-1
1.2 Class I Permits .....	1-1
1.3 Class II Permits .....	1-1
1.4 Wastehauler Permits .....	1-1
1.5 Special Purpose Discharge Permits .....	1-2
1.6 Dry Weather Urban Runoff Permits .....	1-2
1.7 FOG (Fats, Oils, and Grease) Permits.....	1-2
1.8 Zero Discharge Certifications.....	1-2
1.9 Summary of Permits and Certifications in Effect.....	1-3
2.0 Enforcement .....	2-1
2.1 Introduction.....	2-1
2.2 Compliance Inspections .....	2-1
2.3 Compliance Meetings.....	2-1
2.4 Compliance Requirements Letters.....	2-1
2.5 Order to Cease/Terminate Noncompliance/Discharge .....	2-1
2.6 Notices of Violation (NOV) .....	2-2
2.7 Probation Orders .....	2-2
2.8 Enforcement Compliance Schedule Agreement (ECSA).....	2-2
2.9 Regulatory Compliance Schedule Agreement (RCSA) .....	2-2
2.10 Administrative Complaints, Penalties, and Settlement Agreements.....	2-2
2.11 Permit Suspension .....	2-3
2.12 Permit Revocation .....	2-3
2.13 Emergency Suspension Order .....	2-3
2.14 Civil/Criminal Complaints .....	2-3
2.15 Industries with Discharge Violations .....	2-3
2.16 Enforcement – Summary by Permittee .....	2-6
3.0 Santa Ana Watershed Project Authority (SAWPA) .....	3-1
3.1 Brine Line System Pretreatment Program Overview .....	3-1
3.2 SAWPA Pretreatment Program.....	3-2
3.2.1 The City of Beaumont .....	3-2
3.2.2 Eastern Municipal Water District.....	3-2
3.2.3 Inland Empire Utilities Agency .....	3-2
3.2.4 Jurupa Community Services District .....	3-4

3.2.5	San Bernardino Municipal Water Department .....	3-4
3.2.6	San Bernardino Valley Municipal Water District .....	3-5
3.2.7	Santa Ana Watershed Project Authority (SAWPA) .....	3-5
3.2.8	SAWPA Liquid Waste Hauler (LWH) Program .....	3-6
3.2.9	Western Municipal Water District .....	3-6
3.2.10	Yucaipa Valley Water District.....	3-7
3.3	Permittees in Significant Noncompliance (SNC).....	3-8
3.4	Future Projects that will Affect Quantity of Discharge to the Brine Line System .....	3-9
3.5	SAWPA Special Projects .....	3-9
3.6	Brine Wastewater Effluent Characteristics at OC San’s SARI Metering Station (SMS).....	3-10

**List of Tables**

Table 1.1. Active Permits and Certifications July 1 – December 31, 2023 ..... 1-3  
Table 2.1 Industries with Discharge Violations July 1 – December 31, 2023 ..... 2-3  
Table 3.1 Summary of SAWPA and Member/Contract Agency Permittees in Significant Noncompliance (SNC), July 1 – December 31, 2023 ..... 3-8  
Table 3.2 Summary of SAWPA Special Projects, July 1 – December 31, 2023 ..... 3-10  
Table 3.3. SAWPA Daily Average Concentration (mg/L) and Mass (lb/d) Measured from Weekly Sampling at OC San’s SARI Metering Station, July – September 2023 ..... 3-11  
Table 3.4. SAWPA Daily Average Concentration (mg/L) and Mass (lb/d) Measured from Weekly Sampling at OC San’s SARI Metering Station, October – December 2023 ..... 3-12

**List of Appendices**

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

## List of Abbreviations

<b>Acronym or abbreviation</b>	<b>Full phrase</b>	<b>Glossary</b>
BOD	Biochemical Oxygen Demand	
CBMWD	Chino Basin Municipal Water District	
CIP	Clean in Place	
CIUs	Categorical Industrial Users	
CTS	Continuous Treatment System	
CWEA	California Water Environment Association	
ECSA	Enforcement Compliance Schedule Agreement	
EMWD	Eastern Municipal Water District	
ERP	Enforcement Response Plan	
FOG	Fats, Oils, and Grease	
FSE	Food Service Establishment	
FVM	Fluvoxamine	
FY	Fiscal Year	
IEUA	Inland Empire Utilities Agency	
IPA	Isopropyl Alcohol	
IU	Industrial User	
JCSD	Jurupa Community Services District	
JPA	Joint Powers Authority	
LWH	Liquid Waste Hauler	
LWHCMP	Liquid Waste Hauler Cleaning and Maintenance Plan	
MAS	Maintenance Access Structure	
MGD	Million Gallons per Day	
MOU	Memorandums of Understanding	
NAICS	North American Industry Classification System	
ND	Not Detected	
NOV	Notice of Violation	
O&G min.	Oil and Grease of Mineral or Petroleum Origin	
OCA	Order for Corrective Action	
OCSD/OC San	Orange County Sanitation District	
OCWD	Orange County Water District	
ORP	Oxidation-Reduction Potential	
POTW	Publicly Owned Treatment Works	
RCSA	Regulatory Compliance Schedule Agreement	
RO	Reverse Osmosis	
ROW	Right of Way	
SARI	Santa Ana River Interceptor	
SAWPA	Santa Ana Watershed Project Authority	
SBMWD	San Bernardino Municipal Water Department	
SIU	Significant Industrial User	✓

Acronym or abbreviation	Full phrase	Glossary
SLCP	Slug Load Control Plan	
SMR	Self-Monitoring Report	
SMS	SARI Metering Station	
SNC	Significant Noncompliance	
SPDP	Special Purpose Discharge Permit	✓
SSO	Sanitary Sewer Overflow	
TRC	Technical Review Criteria	
TSS	Total Suspended Solids	
US EPA	United States Environmental Protection Agency	
Valley District	San Bernardino Valley Municipal Water District	
Western Water	Western Municipal Water District	
YVWD	Yucaipa Valley Water District	
YVRWFF	Yucaipa Valley Regional Water Filtration Facility	

## Glossary of Defined Terms

<b>Term</b>	<b>Definition</b>	<b>Citation</b>
Compatible Pollutant	A combination of biochemical oxygen demand, suspended solids, pH, fecal coliform bacteria, plus other Pollutants that OCSD's treatment facilities are designed to accept and/or remove. Compatible Pollutants are non-compatible when discharged in quantities that have an adverse effect on OCSD's Sewerage System or NPDES permit, or when discharged in qualities or quantities violating any Federal Categorical Pretreatment Standards, Local Limit, or other discharge requirement.	Ordinance, Section 102.A.14
Discharge Certification	Control mechanism that may be issued to those Users that are discharging regulated wastewater but are not otherwise required to obtain a discharge permit.	Ordinance, Section 307.A
Dry Weather Urban Runoff	Surface runoff flow that is generated from any drainage area within OCSD's service area during a period that does not fall within the definition of Wet Weather. It is surface runoff that contains Pollutants that interfere with or prohibit the recreational use and enjoyment of public beaches or cause an environmental risk or health hazard.	Ordinance, Section 102.A.24
Federal Categorical Pretreatment Standards	Any regulation containing Pollutant discharge limits promulgated by the U.S. EPA in accordance with Sections 307(b) and (c) of the Clean Water Act (33 U.S.C. 1317) which apply to a specific category of Industrial Users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.	Ordinance, Section 102.A.27
Interference	Any discharge which, alone or in conjunction with a discharge or discharges from other sources, either: a) inhibits or disrupts OCSD, its treatment processes or operations, or its biosolids processes, use, or disposal; or b) is a cause of a violation of any requirement of OCSD's NPDES permit or prevents lawful biosolids or treated effluent use or disposal.	Ordinance, Section 102.A.39
Local Discharge Limits, Local Limits	Specific discharge limits developed pursuant to 40 CFR 403.5(c) and enforced by OCSD upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR 403.5(a)(1) and (b).	Ordinance, Section 102.A.42
Non-compatible Pollutant	Any pollutant which is not a compatible pollutant as defined herein.	Ordinance, Section 102.A.54
Ordinance	Document entitled "Wastewater Discharge Regulations" containing OC San requirements, conditions, and limits for connecting and discharging to the sewer system, as may be amended and modified.	Ordinance, Section 102.A.57

<b>Term</b>	<b>Definition</b>	<b>Citation</b>
Pass-Through	Discharge through OC San's Sewerage Facilities to Waters of the U.S. which, alone or in conjunction with discharges from other sources, is a cause of a violation of OC San's NPDES permit.	Ordinance, Section 102.A.59
Pretreatment	The reduction of the amount of Pollutants, the elimination of Pollutants, or the alteration of the nature of Pollutant properties in Wastewater to a level authorized by OCSD prior to, or in lieu of, discharge of the Wastewater into OCSD's Sewerage System. The reduction or alteration can be obtained by physical, chemical or biological processes, by process changes, or by other means.	Ordinance, Section 102.A.65
Pretreatment Program	A program administered by a POTW that meets the criteria established in 40 CFR 403.8 and 403.9 and which has been approved by a Regional Administrator or State Director in accordance with 40 CFR 403.11.	Ordinance, Section 102.A.2
Priority Pollutant	Priority Pollutants shall mean the most recently adopted list of toxic Pollutants identified and listed by EPA as having the greatest environmental impact. They are classified as Non-compatible Pollutants and may require Pretreatment prior to discharge to prevent: a) Interference with OC San's operation; or b) biosolids contamination; or c) Pass Through into receiving waters or into the atmosphere.	Ordinance, Section 102.A.68
Sewerage System	Any and all facilities used for collecting, conveying, pumping, treating, and disposing of Wastewater or sludge or biosolids.	Ordinance, Section 102.A.82
Significant Industrial User	Except as provided in 40 CFR 403.3 (v)(2) and (v)(3), shall mean: (i) All Industrial Users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and/or 40 CFR Chapter I, Subchapter N; and (ii) Any other Industrial User that, pursuant to 40 CFR 403.3(v)(1): discharges an average of 25,000 gallons per day or more of process Wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown Wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or is designated as such by OCSD on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).	Ordinance, Section 102.A.83
Special Purpose Discharge Permit	Control mechanism granted to a user by OCSD to discharge unpolluted water, storm runoff, or groundwater to OCSD's Sewerage Facilities.	Ordinance, Section 305
Total Toxic Organics	The summation of all quantifiable values greater than 0.01 milligrams per liter for the organics regulated by the EPA or OCSD for a specific industrial category.	Ordinance, Section 102.A.94

<b>Term</b>	<b>Definition</b>	<b>Citation</b>
User	Any Person who discharges or causes a discharge of Wastewater directly or indirectly to a public sewer. User shall mean the same as Discharger. User includes Industrial Users as a type of User.	Ordinance, Section 102.A.96
Wastehauler	Any Person carrying on or engaging in vehicular transport of brine, domestic septage (except the SAWPA Sewer Service Area in compliance with the 1996 OCSD/SAWPA Agreement), or Wastewater as part of, or incidental to, any business for the purpose of discharging directly or indirectly said Wastewater into OCSD's Sewerage System.	Ordinance, Section 102.A.98
Zero Discharge Certification	A control mechanism that is issued by OCSD to ensure that specific facilities are not discharging a Pollutant(s) that may otherwise qualify the facility for a discharge permit.	Ordinance, Section 102.A.103

## **1.0 Permits and Certification**

### **1.1 Introduction**

This report is the first of two reports for Fiscal Year 2023/24. The following sections describe the types and quantities of OC San permits issued and deactivated for the period of July 1, 2023 through December 31, 2023. A second report will be prepared and submitted under separate cover for the entirety of Fiscal Year 2023/24.

Orange County Sanitation District (OC San) wastewater discharge permits and certifications provide the means to limit the discharge of specific pollutants from facilities and to establish a pollutant inventory from dischargers.

There are seven (7) wastewater discharge permit and certification classifications in use by OC San's Pretreatment Program: Class I Permits, Class II Permits, Wastehauler Discharge Permits, Special Purpose Discharge Permits, Dry Weather Urban Runoff Discharge Permits, Fats/Oils/Grease (FOG) Permits, and Discharge Certifications.

### **1.2 Class I Permits**

During this reporting period fourteen (14) new permits were issued and twenty-two (22) permits were deactivated for those users who:

- a. are subject to Federal Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; or
- b. discharges an average of 25,000 gallons per day or more of process Wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown Wastewater); or
- c. contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the OC San POTW; or
- d. are designated as such by OC San on the basis that each Industrial User has a reasonable potential for adversely affecting the OC San POTW's operation or for violating any Pretreatment Standard, Local Limit or requirement (in accordance with 40 CFR 403.8(f)(6)); or
- e. may cause Pass Through affecting OC San's ability to comply with its NPDES Permit or other regulations and standards; or
- f. may cause Interference with OC San's Sewerage Facilities.

### **1.3 Class II Permits**

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

- a. have a charge for use greater than the special assessment "OC San Sewer User Fee" included on the County of Orange secured property tax bill exclusive of debt service, and
- b. discharge waste other than sanitary, and
- c. are not otherwise required to obtain a Class I Permit.

### **1.4 Wastehauler Permits**

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

### **1.5 Special Purpose Discharge Permits**

During this reporting period, two (2) new permits were issued and five (5) permits were deactivated for those users who discharge groundwater, subsurface drainage, unpolluted water, or other wastewater to OC San's system. This permit is granted when no alternative method of disposal is reasonably available or to mitigate an environmental risk or a health hazard. One (1) newly issued permit also expired during this reporting period.

### **1.6 Dry Weather Urban Runoff Permits**

OC San accepts limited dry weather urban runoff to the sewer to help address public health and environmental issues. 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 Diversion Program has expanded to include other environmental issues, which are difficult to control through traditional stormwater best management practices.

The Resource Protection Division administers the Dry Weather Urban Runoff Diversion Program through the issuance of a discharge permit for each diversion structure. The permit establishes discharge limits, constituent and flow monitoring requirements, and inspection and maintenance requirements. The permit also provides guidelines that specifically prohibit storm runoff, and the permit authorizes discharge only during periods of dry weather. OC San also conducts oversight visits to verify that a diversion has ceased discharge during wet weather events, and OC San conducts routine sampling and analysis of the urban runoff discharge to ensure compliance with the various regulated constituents discharge limits.

Currently, twenty (20) active Dry Weather Urban Runoff diversion structures are permitted, three (3) are owned and operated by the County of Orange, eleven (11) are owned and operated by the City of Huntington Beach, two (2) are owned and operated by the City of Newport Beach, three (3) are owned and operated by the Irvine Ranch Water District, and one (1) is owned and operated by PH Finance, who is the present owner of the Pelican Hill Resort. No new diversions were added to the Dry Weather Urban Runoff Diversion Program during this reporting period. No diversions ceased operating under the Dry Weather Urban Runoff Diversion Program during this reporting period.

### **1.7 FOG (Fats, Oils, and Grease) Permits**

OC San's Resource Protection Division facilitated the effort to develop a regional FOG Control Program to regulate the quantity and quality of FOG-laden wastewater that is discharged into the sewerage system from food service establishments (FSEs). OC San currently manages the FOG Control Program for thirty six (36) FSEs that discharge directly into OC San owned trunklines in the City of Orange.

During this reporting period, there were thirty two (32) FOG permits renewed, and one (1) FOG permittee's oversight transferred to East Orange County Water District (EOCWD) after it was determined the facility was connected to EOCWD local sewer lines.

Of the thirty six (36) FSEs currently managed, one permit was renewed during the previous six month reporting period (May 1, 2023), one permit is presently in the renewal process due to delay in the receipt of the permit application as a result of Responsible Authority critical illness, and one FSE underwent a change in ownership and the permit is currently being reviewed.

No new FSEs were identified in OC San's direct service area.

### **1.8 Zero Discharge Certifications**

During this reporting period, three (3) new Zero Discharge Certifications were issued for those industries that have operations subject to a federal category regulated by the US EPA but do not discharge industrial wastewater generated from these operations to the sewer. There were no Zero Discharge Certifications that were deactivated this reporting period.

### 1.9 Summary of Permits and Certifications in Effect

A summary of permit and certification activity during the July 1 through December 31, 2023 period is shown in Table 1.1

<b>Table 1.1. Active Permits and Certifications July 1 – December 31, 2023</b> Orange County Sanitation District, Resource Protection Division			
<b>Permit/Certification Type</b>	<b>New Issuance</b>	<b>Deactivated</b>	<b>Active During Reporting Period</b>
Class I (SIU)	14	21	325
Class I Categorical (CIU)	10	11	171
Class I Non-Categorical	4	10	119
Class II	0	1	13
Wastehauler	3	1	39
Special Purpose	3	5	38
Dry Weather Urban Runoff	0	0	20
FOG	0	1	36
Zero Discharge Certification	3	0	32
Total	37	50	503

## **2.0 Enforcement**

### **2.1 Introduction**

The goal of OC San's industrial pretreatment program is to ensure that dischargers maintain compliance with Federal Pretreatment Standards, OC San's Wastewater Discharge Regulations OCSD-53 (Ordinance), and discharge limits through monitoring and verification, in addition to controlling and reducing industrial pollutants. As provided in the Ordinance and Enforcement Response Plan, OC San has a broad range of enforcement mechanisms available, including but not limited to issuing noncompliance sampling fees, administrative penalties, notices of violation, compliance requirements letters, probation orders, enforcement compliance schedule agreements (ECSA), emergency suspension orders, permit suspension, and permit revocation orders.

This report describes the enforcement actions that OC San initiated or continued against noncompliant permittees for the semi-annual reporting period of July 1, 2023 through December 31, 2023.

Appendix 1 of this report, entitled *Monitoring and Compliance Status Report*, contains information regarding the number of industrial inspections and the number of OC San and self-monitoring samples taken for each Class I permittee for the first and second quarters of FY 2023/24. 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 facility inspections conducted, the number of samples taken at each facility, the pollutant(s) in discharge violations, and other applicable comments, including name changes and permit issuances/deactivations.

### **2.2 Compliance Inspections**

OC San staff conduct compliance inspections to identify and address any noncompliance problems and corrective actions and to verify the progress and completion of compliance requirements letters, probation orders, or enforcement compliance schedule agreements.

Sixteen (16) compliance inspections were conducted during the first and second quarters of FY 2023/24.

### **2.3 Compliance Meetings**

Compliance meetings are held as a result of the permittee's inability to achieve compliance with discharge requirements or to comply with OC San's Ordinance. The meetings are held with company representatives to discuss the discharge compliance problems and proposed long-term solutions.

Three (3) compliance meetings were conducted during the first and second quarters of FY 2023/24.

### **2.4 Compliance Requirements Letters**

Compliance requirements 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 ERP, such as a compliance meeting.

Eighteen (18) compliance requirements letters were issued during the first and second quarters of FY 2023/24.

### **2.5 Order to Cease/Terminate Noncompliance/Discharge**

Orders are issued where a permittee is continually noncompliant 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 notifies the permittee of escalated enforcement in accordance with the ERP as a result of continued noncompliance.

There were no orders to terminate discharge issued during the first and second quarters of FY 2023/24.

## **2.6 Notices of Violation (NOV)**

An NOV is a written notification from OC San that references findings from recent sampling and inspections, and indicates that specific violations of the permittees' discharge limits, permit conditions, and/or ordinance prohibitions have occurred. The NOV instructs the permittee to take immediate action to correct the problem. NOVs related to discharge limit violations are accompanied by noncompliance sampling and/or processing fees.

Eighty three (83) NOV's were issued in the first and second quarters of FY 2023/24.

## **2.7 Probation Orders**

Upon determination that a permittee is in noncompliance with the terms and conditions specified in its permit or any provision of OC San's Ordinance, OC San may issue a probation order. The probation order contains conditions, requirements, and a compliance schedule. The term of a probation order does not exceed ninety (90) days. The permittee is required to comply with all conditions and requirements within the time specified, including the submittal of information pertaining to waste source characterizations, pretreatment modifications, waste minimization alternatives, and increasing the frequency of self-monitoring.

There were no probation orders issued in the first and second quarters of FY 2023/24.

## **2.8 Enforcement Compliance Schedule Agreement (ECSA)**

An ECSA is an agreement between the permittee and OC San specifying that pretreatment equipment is installed or pollution prevention measures are implemented by the permittee within a scheduled time period, and that the permittee remains in consistent compliance during the term of the ECSA. The ECSA contains terms and conditions by which the permittee must operate and specifies dates for construction or acquiring and installing the pretreatment equipment and/or implementing waste minimization to achieve compliance. During the ECSA, inspection and sampling of the facilities are conducted monthly by OC San's inspectors to verify that all terms and conditions of the ECSA are met. In addition, the permittee is required to perform accelerated and extended self-monitoring.

There were no ECSAs issued during the first and second quarters of FY 2023/24.

## **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 US EPA, or OC San may enact revised discharge limits. If the General Manager or his designee determines that a permittee would not be in compliance with the newly adopted or revised limits, the permittee may be required to enter into a RCSA with OC San. The terms and conditions of an 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 an RCSA may contain terms and conditions including, but not limited to, requirements for installation of pretreatment equipment and facilities, submittal of drawings or reports, waste minimization practices, or other provisions to ensure compliance with OC San's Ordinance. While the RCSA is in effect, any discharge by the permittee in violation of the RCSA will require payment of non-compliance sampling fees in accordance with Article 6 of OC San's Ordinance.

There were no RCSAs issued during the first and second quarters of FY 2023/24.

## **2.10 Administrative Complaints, Penalties, and Settlement Agreements**

Pursuant to the authority of California Government Code Section 54740.5, OC San may issue administrative complaints and penalties against the responsible officer or owner of any company that violates any permit condition or effluent limit. In accordance with an OC San Board of Directors Resolution, OC San may also negotiate a settlement agreement in lieu of an administrative complaint, which includes corrective actions on the part of the industry and reduced administrative penalties.

There were no settlement agreements or administrative penalties issued during the first and second quarters of FY 2023/24.

**2.11 Permit Suspension**

When OC San believes that grounds exist for permit suspension, the permittee is notified in writing of the reasons for permit suspension and the date of the permit suspension hearing. At the hearing, OC San staff and the permittee are provided the opportunity to present their evidence to the Hearing Officer. After the hearing, a written determination is made, and upon issuance of the order of permit suspension, the permittee must cease discharge to the sewer for the duration of the suspension.

There were no permit suspensions ordered during the first and second quarters of FY 2023/24.

**2.12 Permit Revocation**

The last recourse in the chain of administrative enforcement provisions is permit revocation. A permittee with a critical noncompliance record or who has failed to pay fees and charges is notified in writing of the reasons for permit revocation and the date of the permit revocation hearing. At the hearing OC San staff and the permittee are provided the opportunity to present evidence to a designated hearing officer. After the conclusion of the hearing, the hearing officer makes a determination if permit revocation is warranted and provides a written report to the General Manager for final determination. Should the General Manager determine that the noncompliance record is substantial, revocation of the industrial waste discharge permit and loss of sewer discharge privileges may result.

There were no permit revocations ordered during the first and second quarters of FY 2023/24.

**2.13 Emergency Suspension Order**

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

There were no emergency suspension orders issued during the first and second quarters of FY 2023/24.

**2.14 Civil/Criminal Complaints**

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

There were no civil/criminal complaints made during the first and second quarters of FY 2023/24.

**2.15 Industries with Discharge Violations**

The table below lists those facilities with discharge violations between July 1 – December 31, 2023, and whether the violation(s) exceeded Federal Categorical Pretreatment Standard Limits, OC San Local Discharge Limits, or both.

**Table 2.1 Industries with Discharge Violations July 1 – December 31, 2023**  
Orange County Sanitation District, Resource Protection Division

Facility	Permit No.	Pollutant(s) in Violation	Date or Month of Violation	Exceeded Federal Categorical Limit	Exceeded Local Limit
Advance-Tech Plating, Inc.	1-021389	Zinc	7/26/2023	x	-

**Table 2.1 Industries with Discharge Violations July 1 – December 31, 2023**  
Orange County Sanitation District, Resource Protection Division

Facility	Permit No.	Pollutant(s) in Violation	Date or Month of Violation	Exceeded Federal Categorical Limit	Exceeded Local Limit
Air Industries Company, A PCC Company (Knott)	1-531404	Cyanide	9/6/2023	x	-
Air Industries Company, A PCC Company (Knott)	1-531404	Cadmium	12/12/2023	x	x
Air Industries Company, A PCC Company (Knott)	1-531404	Cyanide	9/1/2023	x	-
Allied International	1-031107	Zinc	7/12/2023	-	x
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	Zinc	Oct-23	x	-
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	Zinc	Oct-23	x	-
AlSCO, Inc.	1-021656	O&G min.	9/8/2023	-	x
AlSCO, Inc.	1-021656	O&G min.	10/24/2023	-	x
APCT Orange County	1-600503	Copper	11/4/2023	-	x
Arrowhead Products Corporation	1-031137	Fluoride	11/2/2023	x	-
Avid Bioservices, Inc.	1-571332	Acetone	7/6/2023	x	-
BAZZ HOUSTON CO .	1-031010	O&G min.	10/3/2023	-	x
Bristol Industries	1-021226	Zinc	10/31/2023	-	x
Cali Chem Inc. dba Be Beauty	1-601976	O&G min.	10/12/2023	-	x
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	pH	Sep-23	-	x
Embee Processing (Anodize)	1-600456	Cyanide	Nov-23	x	-
Gold Coast Baking Company, Inc.	1-601700	pH	Jul-23	-	x
Gold Coast Baking Company, Inc.	1-601700	pH	Aug-23	-	x
Gold Coast Baking Company, Inc.	1-601700	pH	Sep-23	-	x
Gold Coast Baking Company, Inc.	1-601700	pH	10/16/2023	-	x
Gold Coast Baking Company, Inc.	1-601700	pH	10/17/2023	-	x
Gold Coast Baking Company, Inc.	1-601700	pH	11/15/2023	-	x
Graphic Packaging International, Inc.	1-571314	pH	12/4/2023	-	x
Harbor Truck Bodies, Inc.	1-021286	Molybdenum	7/12/2023	-	x

**Table 2.1 Industries with Discharge Violations July 1 – December 31, 2023**  
Orange County Sanitation District, Resource Protection Division

Facility	Permit No.	Pollutant(s) in Violation	Date or Month of Violation	Exceeded Federal Categorical Limit	Exceeded Local Limit
Harbor Truck Bodies, Inc.	1-021286	Molybdenum	8/8/2023	-	x
Harbor Truck Bodies, Inc.	1-021286	Molybdenum	8/22/2023	-	x
Howmet Global Fastening Systems Inc.	1-021081	Cyanide Amenable	9/1/2023	x	-
J&J Marine Acquisition Co., LLC	1-551152	Copper	Sep-23	-	x
J&J Marine Acquisition Co., LLC	1-551152	Zinc	Sep-23	-	x
La Habra Bakery	1-031029	pH	Oct-23	-	x
Linco Industries, Inc.	1-021253	Cadmium	8/3/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	8/3/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	9/22/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	10/17/2023	x	x
Linco Industries, Inc.	1-021253	Cadmium	8/1/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	8/1/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	10/1/2023	x	-
Linco Industries, Inc.	1-021253	Cyanide	9/1/2023	x	-
McKenna Labs, Inc.	1-021422	Zinc	Sep-23	-	x
Pacific Image Technology, Inc.	1-021070	Copper	7/26/2023	-	x
Pacific Image Technology, Inc.	1-021070	Copper	7/1/2023	x	-
Patriot Wastewater, LLC (Freedom CWT)	1-521861	Arsenic	Nov-23	x	-
Patriot Wastewater, LLC (Freedom CWT)	1-521861	Titanium	11/16/2023	x	-
Patriot Wastewater, LLC (Freedom CWT)	1-521861	4-Methylphenol	12/6/2023	x	-
Pioneer Circuits, Inc.	1-011262	Lead	10/10/2023	x	x
Pioneer Circuits, Inc.	1-011262	Lead	10/1/2023	x	-
Prima-Tex Industries Inc.	1-031036	Zinc	8/16/2023	-	x
Q-Flex Inc.	1-600337	Total Toxic Organics [§433.11e]	9/19/2023	x	-
Q-Flex Inc.	1-600337	Copper	9/1/2023	x	-
RBC Transport Dynamics Corp.	1-011013	Cadmium	9/13/2023	x	x

**Table 2.1 Industries with Discharge Violations July 1 – December 31, 2023**  
Orange County Sanitation District, Resource Protection Division

Facility	Permit No.	Pollutant(s) in Violation	Date or Month of Violation	Exceeded Federal Categorical Limit	Exceeded Local Limit
RBC Transport Dynamics Corp.	1-011013	Cadmium	10/2/2023	x	x
RBC Transport Dynamics Corp.	1-011013	Cadmium	11/9/2023	x	x
RBC Transport Dynamics Corp.	1-011013	Cadmium	12/6/2023	x	x
RBC Transport Dynamics Corp.	1-011013	Cadmium	10/1/2023	x	-
RBC Transport Dynamics Corp.	1-011013	Cadmium	9/1/2023	x	-
Santana Services	1-021016	Chromium	7/17/2023	x	-
Stainless Micro-Polish, Inc.	1-021672	Chromium	10/26/2023	x	x
Stainless Micro-Polish, Inc.	1-021672	Chromium	Dec-23	x	x
Stainless Micro-Polish, Inc.	1-021672	Chromium	12/6/2023	x	x
Stainless Micro-Polish, Inc.	1-021672	Chromium	Dec-23	x	-
Stainless Micro-Polish, Inc.	1-021672	Chromium	Oct-23	x	-
Stainless Micro-Polish, Inc.	1-021672	Chromium	Sep-23	x	-
Summit Interconnect, Inc., Orange Division	1-600060	Dissolved Sulfide	11/21/2023	-	x
Summit Interconnect, Inc., Orange Division	1-600060	Sulfide	11/21/2023	-	x
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	pH	9/13/2023	-	x
TTM Technologies North America, LLC. (Coronado)	1-521859	Copper	9/22/2023	-	x
TTM Technologies North America, LLC. (Coronado)	1-521859	Copper	Sep-23	x	-
Universal Molding Co.	1-521836	Chromium	8/22/2023	x	x
Universal Molding Co.	1-521836	Chromium	Aug-23	x	-

**Note: violations with only the month indicated are monthly discharge violations.**

**2.16 Enforcement – Summary by Permittee**

This section summarizes various enforcement actions conducted for permittees in the first half of FY 2023/24. Potential enforcement actions include but are not limited to compliance inspections, compliance

meetings, Probation Orders, Enforcement Compliance Schedule Agreements, Regulatory Compliance Schedule Agreements, Orders to Cease, Permit Suspensions, and Permit Revocations.

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

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

As a result of multiple pH and heavy metals violations in 2019, ATP identified malfunctioning equipment and addressed compliance deficiencies with the installation of additional pretreatment equipment. Throughout 2021 and 2022, ATP continued to have compliance issues including violations of nickel, zinc, and chromium limits. Corrective actions included contracting a certified wastewater treatment operator, waste-hauling all solids from the treatment system, updated facility drawings, updated operations and maintenance manual, updated wastewater characterization, and implementation of a daily log to track treatment system status. As a result of zinc and chromium violations in April and June of 2022, OC San conducted a compliance inspection in June 2022. At the time of inspection, ATP reported personnel did not maintain pH probe calibration, which likely resulted in ineffective treatment.

In September 2022, OC San issued an NOV for June's monthly average zinc violation. During a compliance inspection in November 2022, ATP attributed the violations to improper sludge management, which is initiated once solids are observed at the sample point. OC San also noted facility figures were inaccurate, the facility did not document all batch treatment, and ATP made several facility modifications without prior written notification to OC San. The facility installed a sludge collection tank and second filter press. The facility also removed the batch treatment tank and disconnected related pretreatment and process control equipment.

In December 2022, OC San issued a compliance requirements letter that directed ATP to attend a compliance meeting to discuss facility figures, recent non-compliances, pretreatment and waste segregation, and facility recordkeeping. As a result of operator error, irregular equipment calibration, and improper sludge management, ATP added inclined plates to the lamella clarifier to promote sedimentation, instituted regular equipment calibration, purchased test equipment to review wastewater composition, and improved sludge management by installing additional process control equipment. However, the risk remains that concentrated wastewater may discharge to the sewer without adequate treatment due to the use of a manual valve that does not provide proper segregation and control of waste. OC San also issued an NOV for failure to provide prior written notification of process changes and requiring ATP to submit a report that summarized recent facility modifications and detailed the facility's plan for waste management and interim compliance while the batch treatment tank and related process control equipment remained out of service.

On January 31, 2023, ATP submitted a letter that summarized recent facility modifications that were made without prior written notification to OC San, and proposed to install a holding tank and new process control equipment. In the interim, ATP indicated that facility personnel would utilize handheld sensors to confirm pretreatment parameters that are manually adjusted. OC San determined that the use of handheld meters and the manual application of pretreatment chemistry to control wastewater is not an acceptable method for interim or long-term compliance. In February 2023, OC San issued a compliance requirements letter that directed ATP to reinstall the automated process control equipment and to submit a proposal to ensure adequate treatment of all wastestreams along with an updated operations and maintenance manual.

Although ATP submitted several proposals to OC San in March 2023, the proposals had multiple deficiencies including an incomplete waste characterization, missing technical specifications related to treatment chemistry, the transfer of waste using drums and flex hosing, and omitting correspondence with

chemical vendors. As a result of the deficient proposal and an operations and maintenance manual, ATP was directed to resubmit both by June 2023.

#### July 1 – December 31, 2023

On July 10, 2023, ATP resubmitted an operations and maintenance manual. After review, the manual contained several deficiencies related to waste characterization, treatment chemistry, and chemical vendor correspondence. Moreover, ATP failed to resubmit a proposal to ensure adequate treatment of all generated wastestreams. On July 26, 2023, ATP had a daily average zinc violation for which an NOV was issued on August 7, 2023. On October 11, 2023, OC San conducted a compliance inspection, at which time, ATP was unable to readily identify the source for the zinc violation. During the inspection, ATP was unable to furnish batch logs for several dates on which the facility reported self-monitoring sampling and discharge. Additionally, OC San noted it was unclear if ATP had complied with pretreatment equipment calibration requirements based on the facility records available for review. Based on the above, OC San has drafted an ECSA. OC San will finalize the ECSA and continue enforcement in the next reporting period.

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

#### **Air Industries Company, A PCC Company (Knott) (Permit No. 1-531404)**

Air Industries Company, A PCC Company (Knott) (AIC-Knott) manufactures titanium and stainless steel fasteners (rivets, screws, bolts, nuts) for the aviation and aerospace industries. Wastewater is generated from the following operations: alkaline cleaning, etching, passivation, pickling, chemfilm, cadmium and nickel electroplating, and molten salt deoxidation of titanium parts. Rinse water from metal surface finishing is segregated and treated through a continuous pretreatment system. Pretreatment system consists of chrome reduction, hydroxide precipitation, coagulation and flocculation, clarification, and sludge dewatering. Cyanide bearing waste is directed through an ion exchange system and is recycled back to the process. Mop water and oily water waste are segregated into totes and waste hauled offsite for disposal.

#### July 1 – December 31, 2023

On September 6, 2023, AIC-Knott had a cyanide violation, for which an NOV was issued on October 18, 2023. On November 6, 2023, AIC-Knott submitted a root cause analysis that attributed the violation to a potential contamination of the plating line due to an operator error where the operator failed to close the door to processing equipment, which resulted in approximately 5,000 small parts falling into the process tanks. As a corrective action, AIC Knott conducted maintenance on the plating line, transferred the operator to a different workstation, and retrained the operator on drag out procedures. Additionally, AIC-Knott is currently working on rerouting the remaining cyanide-generating tanks to the existing cyanide recycling system. The September monthly NOV for cyanide was issued on December 4, 2023. On December 12, 2023, AIC-Knott had a cadmium violation for which an NOV will be issued in the next reporting period.

The sample result from the November 2023 sample event will result in a monthly mass limit violation for fluoride and will be issued in the next reporting period. OC San will continue enforcement during the next reporting period and will continue to monitor AIC-Knott's discharge and compliance status on a quarterly basis.

#### **Allied International (Formerly Hanson-Loran Co., Inc.) (Permit No. 1-031107)**

Allied International (Allied) manufactures water-based floor finishers and specialty cleaners for distribution and sale by various independent contractors. The processes include dry blending (from which there is no wastewater discharge) and wet blending. The dry blending process is located inside the building, where dry powders are blended to produce Allied's industrial cleaners. Wet blending is accomplished in four mixing tanks at the rear of the building. Products include floor cleaners, waxes, strippers, cleaners, degreasers, sanitizers, disinfectants, and soaps.

July 1 – December 31, 2023

On July 12, 2023, Allied had a zinc violation, for which an NOV was issued on August 7, 2023. Allied conducted a review of production records and safety data sheets and could not determine the source in which zinc could have been introduced at that concentration to the manufacturing process and generated wastewater. The self-monitoring sampling on August 31, 2023 as a follow-up to the violation demonstrated compliance with the zinc discharge limits.

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

**Alloy Die Casting, Co. dba ADC Aerospace (Permit No. 1-531437)**

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

July 1 – December 31, 2023

On October 7, 2023, ADC had a zinc violation, for which an NOV was issued on December 27, 2023. ADC had not informed OC San of an additional sample collected from wastewater which had already been discharged, nor of the permit limit exceedance; therefore, a voluntary self-monitoring form was created after-the-fact in late December 2023. This daily limit violation also resulted in a zinc monthly average discharge limit violation for the month of October 2023, for which an NOV will be issued in the next reporting period.

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

**Alloy Tech Electropolishing, Inc. (Permit No. 1-011036)**

Alloy Tech Electropolishing, Inc (Alloy Tech) is an electropolishing job shop. Workpieces consisting of cast, stamped, or machined parts, and fabricated assemblies, are electropolished by manual rack techniques in six process tanks (100 to 2,000 gallons). Two tube processing stations handle tubing components. The processing of a typical part begins with metal preparation (alkaline cleaning, caustic cleaning, or nitric pickling to remove oxides and discoloration) followed by either passivation or electropolishing in a phosphoric/sulfuric acid solution. Passivation processes also may include nitric, dichromate, and citric acid. The company also provides precision cleaning in the onsite Class 100 cleanroom. After ultrasonic alkaline cleaning, the parts are rinsed with ultra-pure reverse osmosis deionized water, dried, purged with high-purity nitrogen, packaged, and sealed.

Wastewater generated at Alloy Tech comprises of the spent alkaline cleaners, the associated rinse wastestreams, and the reject from the RO system. The RO reject is plumbed to a floor drain and does not pass through the sample point. Alloy Tech employs hydroxide chemical precipitation followed by a filter press to treat wastestreams generated at the facility.

After a molybdenum violation in January 2023 and subsequent compliance inspection, a compliance letter was issued to Alloy Tech, requiring submission of a proposal for effective treatment of molybdenum. After evaluation of multiple treatment technologies, Alloy Tech submitted a proposal in June 2023.

July 1 – December 31, 2023

Alloy Tech was issued an NOV on August 7, 2023, for the monthly limit violation of zinc detected in May 2023. After working with Alloy Tech on proposal deficiencies, the review of the proposed treatment system is complete. OC San is drafting a response letter to reject the proposal as it does not provide Alloy Tech long-term compliance with molybdenum discharge limits.

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

**Alsco, Inc. (Permit No. 1-021656)**

Alsco, Inc. (Alsco) performs laundry service for hotels and restaurants. The facility utilizes city water mixed with detergent and bleach to primarily wash table linens, napkins, aprons, uniforms, blankets, patient apparel, floor mops, mats, linens, and bedsheets. Wastewater generated from machine wash water, floor washdown, and a small amount of boiler blowdown discharges through a lint filter to an underground clarifier without any additional form of pretreatment.

July 1 – December 31, 2023

On September 8, 2023, Alsco had an O&G min. mass loading violation for which an NOV was issued on October 11, 2023. On October 24, 2023, Alsco had an O&G min. mass loading violation for which an NOV will be issued in the next reporting period. On October 26, 2023, OC San conducted a compliance inspection to investigate the O&G min. violation that occurred on September 8, 2023. On November 9, 2023, Alsco submitted a corrective action report that attributed the violation to a leak in a hydraulic line from one of the facility's industrial wash machines. The facility reports that while personnel immediately fixed the leak, the oil and grease collection tray was compromised during repair, and oil and grease contaminants were subsequently discharged to the facility's wastewater system. As a corrective action, Alsco has updated its maintenance procedures which includes personnel removing wash machines that have hydraulic leaks from service until repairs can be made. Moreover, any repairs will be conducted beyond operating hours to ensure facility personnel can drain the wastewater collection trench to prevent the release of any O&G material to the pretreatment system.

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

**Aluminum Forge – Div. of Alum. Precision (Permit No. 1-071035)**

Aluminum Forge produces parts for aerospace, military, automotive and commercial applications, ranging from piston heads to window frames. The campus has a total of 11 hydraulic presses ranging from 300 to 3,500 tons.

Aluminum and associated dies are preheated at 750° F. The heated metal is block formed in the first operation. Parts are quenched, then sent to one of two caustic etch lines to clean the mold release compound from the part. The etch lines consists of a caustic cleaner, acid cleaner, three countercurrent rinses and a final hot deionized water rinse. Both etch lines are identical in layout and size. Aluminum Forge has a continuous hydroxide pretreatment system.

July 1 – December 31, 2023

On July 21, 2023, an NOV was issued for the violation that occurred in June 2023 from the previous reporting period. A compliance inspection was conducted on August 8, 2023 to investigate the zinc violation. During the inspection it was observed that the rinse line coming from the dye penetrant test line was installed and going to the sample point. No other changes to the wastewater system were observed. Operations at the facility have largely been consistent with no large production cycles according to the permittee. While the root cause of the zinc violation could not be readily identified, operations staff at the facility have been retrained in the operation of the wastewater treatment system as a corrective action.

OC San will continue enforcement during the next reporting period and will continue to monitor Aluminum Forge's discharge and compliance status on a quarterly basis.

### **Amerimax Building Products, Inc. (Permit No. 1-021102)**

Amerimax Building Products, Inc. (Amerimax) coats large rolls of aluminum sheet material. The coils are precleaned with alkaline solution prior to conversion coating, painting, curing, and quenching. Wastewater generated from alkaline precleaning and quenching routes to a three-stage clarifier and discharges to the sample point and then to the sewer.

July 1 – December 31, 2023

On July 18, 2023, OC San issued an NOV for the zinc mass loading violation from the previous reporting period in June 2023. On July 25, 2023, OC San conducted a compliance inspection to investigate the root cause of the violation. On July 31, 2023, OC San issued a compliance requirements letter that directed Amerimax to submit a corrective action report. On September 5, 2023, OC San issued an NOV for June's monthly average zinc mass loading violation. On October 16, 2023, and December 7, 2023, Amerimax submitted corrective action reports that attributed the mass loading violation to the facility's conversion coat chemistry. Specifically, Amerimax reported its conversion coat manufacturer had recently changed formulations and added zinc among the list of constituents. Based on the proximity between the facility's no-rinse conversion coat module and the pretreatment system, Amerimax indicated conversion coat chemistry likely splashed into the facility's clarifier and caused non-compliance issues. As corrective actions, Amerimax cleaned and enclosed the clarifier, installed splash guards around the conversion coat module, and installed a closed-loop cleaning system dedicated to all parts and materials used in conversion coat management.

Amerimax had no further violations during this reporting period. Therefore, no further enforcement actions are required at this time and this enforcement case is closed.

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

### **APCT Orange County (Permit No. 1-600503)**

APCT Orange County (APCT) specializes in prototype, quick-turn, and semi-production printed circuit board orders. The manufacturing operations begin by generating the film photo-tools from the customer. Production of the typical multilayer board begins by cutting the copper clad and pre-preg materials, photoresist application, inner-layer circuit imaging, photoresist developing, ammonium etching, alkaline resist stripping, and automatic optical inspection (AOI). This is followed by Cobra Bond surface preparation, lamination, and drilling. The holes are desmeared with permanganate and made conductive through a palladium-activated direct metallization process. Outer-layer circuit development proceeds by either panel-plate or pattern-plate process steps. Panel-plate boards undergo copper plating followed by photoresist application, circuit imaging, photoresist developing, and ammonium etching. Pattern-plate boards undergo photoresist application, circuit imaging, resist developing, and copper plating. The pattern-plate boards are then sent offsite for tin/lead plating and brought back onsite for ammonium etching and tin resist stripping. After resist stripping, the boards undergo a second AOI inspection, followed by liquid photo imageable solder mask application. The boards are again sent offsite for final surface finishing, such as hot air solder leveling and/or nickel/gold plating. Upon return, the boards receive legend screening, a final visual inspection, routing, and electrical testing. APCT also operates an electroless nickel and electroless gold line (ENIG line).

The effluent discharge at APCT is generated by the aqueous fume scrubbing, the various spent process solutions, and the associated rinse wastestreams. Pretreatment consists of a continuous ion exchange system for the majority of the running rinses; a scavenger ion exchange system for some rinses (tin plating/stripping, scrubbers, and catalyst); batch treatment for concentrated spent solutions and ion exchange regenerant wastes; and pH adjustment for non-metal bearing wastestreams. Some spent solutions are wastehauled offsite.

In September 2022 and March 2023, APCT had copper violations which were attributed to a malfunction of the filter press and accumulation of sludge. In response to a compliance requirement, APCT submitted

a proposal to prevent sludge from discharging to the sample point and rerouting wastewater flow for additional treatment.

July 1 – December 31, 2023

On September 11, 2023, OC San issued a compliance requirements letter accepting APCT's proposal to cut and cap the discharge line going from their filter press to tank SIX-T2. The replumbing work was completed on October 28, 2023 and an updated drainage drawing was submitted to OC San on December 8, 2023.

On November 4, 2023, APCT had a copper daily loading limit violation for which an NOV was issued on December 27, 2023.

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

**Arrowhead Products Corporation (Permit No. 1-031137)**

Arrowhead Products Corporation (Arrowhead) manufactures air ducting systems, fuel manifolds, flexible metallic joints connectors, and complex fabricated components for aerospace applications. Wastewater generating operation(s) include abrasive jet machining, caustic dip, dye penetrant testing, general pickling, titanium pickling, alkaline cleaning, permanganate cleaning, pressure testing, Turco cleaning, and ultrasonic cleaning. Arrowhead operates a continuous pretreatment system, which consists of pH adjustment, chrome reduction, filtration, ion exchange, and clarification.

In 2021, Arrowhead had non-compliance issues ranging from bypass of the pretreatment system and the compliance sample point to lack of adequate treatment or flow measurement, which resulted in the issuance of a RCSA. At the conclusion of the RCSA, on February 15, 2022, Arrowhead and OC San conducted a multi-sampling event that resulted in two fluoride daily average violations for which two NOVs were issued in March 2022. During the compliance inspection conducted in March 2022, Arrowhead could not readily identify the root cause of the fluoride violations. However, Arrowhead believed it could have been due to the fluoride resin regeneration process. Arrowhead continued to observe an increase in fluoride concentrations after each regeneration procedure. In February 2022 and April 2022, Arrowhead had cyanide violations for which NOVs were issued in April 2022 and June 2022, respectively. In May 2022, OC San issued an NOV for the February 2022 fluoride monthly limit violation.

In February 2023, a compliance meeting was held after multiple fluoride inspections from June to August of 2022, where Arrowhead attributed the violation to ongoing continuous improvement of the treatment system. In response to a compliance requirements letter issue in March 2023, Arrowhead submitted a wastewater characterization and a short-term proposal to ensure compliance with discharge limits. OC San issued a compliance requirements letter in June 2023, accepting the proposal to hold and test every batch of wastewater before discharge to the sewer.

July 1 – December 31, 2023

Arrowhead stated that in the Fluoride Characterization Report Addendum submitted to OC San on June 12, 2023, the fume scrubber and the clean room sump are likely the most significant sources of fluoride. As a result, Arrowhead requested an extension on July 14, 2023, to submit the long-term compliance plan in September 2023, which San accepted.

Arrowhead submitted a proposal for long-term compliance on September 1, 2023. The proposal included removing and replacing two hydrofluoric acid process tanks in the clean room. The two new process tanks will have two compartments, one for the hydrofluoric acid and one to collect rinse water. Rinse water from this operation will be used to replenish the hydrofluoric acid or hauled off. In addition, an in-line fluoride monitoring system will be installed. Four monitoring stations will be installed in the following locations: between the two fluoride treatment ion exchange vessels, pretreatment system discharge, non-categorical discharge, and the combined non-categorical and categorical discharge. The fume scrubber will also be modified in order to divert scrubber wastewater to be containerized in totes or drums. Arrowhead will also keep one batch tank from the temporary batch treatment system to be able to divert

wastewater from the treatment system to be checked for disposal or retreatment. The long-term compliance proposal is currently under review by OC San.

On November 2, 2023, Arrowhead had a daily loading limit fluoride violation for which an NOV was issued on December 13, 2023. On December 11, 2023, OC San issued an NOV to Arrowhead for failing to produce their batch system treatment log during a quarterly inspection on August 7, 2023. On October 25, 2023, OC San issued an NOV for the November 2022 monthly fluoride loading limit violation.

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

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

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

#### **July 1 – December 31, 2023**

On July 6, 2023, Avid had a daily average acetone violation for which an NOV was issued on August 2, 2023. On August 28, 2023, OC San conducted a compliance inspection to investigate the root cause of the acetone violation, collect a resample, and review facility operations. During the inspection, Avid summarized their internal investigation performed to identify sources of acetone or isopropyl alcohol (IPA) that resulted in the violation. Avid reported that the acetone violation was attributed to the presence of IPA in wastewater generated from a column qualification (CC400) used in their downstream manufacturing process. The IPA in the wastewater generated from this process was likely converted to acetone in the facility's waste neutralization vault prior to discharge which appears to have caused the acetone violation. On August 30, 2023, Avid submitted a corrective action report which included the following: (1) purge and rinse the waste neutralization tank and collect voluntary confirmation samples following rinsing, (2) revise the batch record form to provide instructions for facility personnel to capture and collect all solutions from the CC400 column during the column qualification process, (3) install new labels on columns that use IPA, (4) identify IPA-containing processes in the production schedule prior to manufacturing runs, (5) review existing clients that use IPA as residual in column qualification, and (6) implement process improvement to new client intake processes to take actions needed regarding hazardous materials in advance of production. Multiple sample results since the violation have demonstrated compliance with acetone discharge limits.

On October 6, 2023, Avid had a slug discharge of approximately 34.5 gallons of wastewater with an estimated pH range between 5.4 and 6.0 from their waste neutralization system. On October 12, 2023, Avid provided written notification via email of the slug discharge to OC San. Avid attributed the slug discharge to an operator manually engaging the waste neutralization pump to convey wastewater to the compliance sample point while the waste neutralization system was actively adjusting pH levels. As a corrective action, Avid implemented training of facility personnel to measure the pH of the wastewater to ensure the pH levels are within permit discharge limits prior to manually engaging the waste neutralization pump. On November 9, 2023, OC San issued an NOV to Avid for failure to comply with ordinance prohibitions for notification of a spill or slug loading, which requires immediate notification to OC San by telephone.

Avid had no further violations during this reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

**BAZZ HOUSTON CO. (Permit No. 1-031010)**

Bazz Houston Co. (Bazz) manufactures springs, stampings and various metal parts through machining and bending operations. Wastewater is primarily generated by deburring operations and is discharged into a sump.

In January 2021, Bazz had an oil & grease violation. Bazz attributed the violation to incorrect sampling technique utilized by their contracted laboratory technician. A compliance inspection was conducted and OC San observed that the discharge was not hard-plumbed to the discharge point, where wastewater flows as runoff over a concrete pad into the sump. OC San issued a compliance requirements letter in May 2021, requiring Bazz to hard-plumb and reroute their piping configuration, install an accessible sample box lid, establish a maintenance schedule for their sump and provide a detailed explanation as to why their re-sample is not representative of their discharge. Bazz submitted their proposal to address their compliance issues in June 2021. In August 2021, OC San accepted Bazz's proposal to degrease all parts prior to deburring, install rigid piping to convey rinse water from the deburring machine directly to the sump, install an accessible sump lid, and maintain a weekly cleaning schedule of the sump. Bazz completed the implementation of these corrective actions in October 2021.

July 1 – December 31, 2023

On October 3, 2023, Bazz had an O&G min violation, for which an NOV was issued on November 20, 2023. A root cause analysis and corrective action report has been requested to be submitted by December 15, 2023.

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

**Beverage Visions LLC (Yorba Linda) (Permit No. 1-601449)**

Beverage Visions LLC (Beverage Visions) blends raw ingredients with water to produce beverages. Wastewater generated from clean-in-place (CIP) and equipment rinses, steam sterilization, boiler blowdown, and a water jet for material fabrication discharges to a multistage clarifier then to sewer. The facility utilizes an automated pH adjustment system, which doses caustic and sulfuric acid to the clarifier's first stage.

July 1 – December 31, 2023

On July 20, 2023, OC San issued a compliance requirements letter that directed Beverage Visions to attend a compliance meeting on August 15, 2023. During the compliance meeting, Beverage Visions and OC San discussed pretreatment and the facility's recent proposals for adequate pH adjustment. While Beverage Visions has proposed to increase hydraulic capacity and retention, key operating parameters specific to peak flowrate and facility discharge remain unclear, so design assessment and review cannot proceed. On November 30, 2023, OC San issued a compliance meeting summary and requirements letter that directed Beverage Visions to address the design parameter deficiencies and to resubmit a proposal for adequate pH adjustment.

OC San will review Beverage Visions' pretreatment system proposal upon receipt and will continue enforcement in the next reporting period.

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

**Bioduro LLC (Jeronimo) (Permit No. 1-601617)**

Bioduro, LLC (Jeronimo) (Bioduro 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. Bioduro 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 Bioduro 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, 2023

On July 5, 2023, OC San issued an NOV for an acetone monthly average limit violation on a sample collected during April 2023. On July 19, 2023, OC San conducted a compliance inspection to investigate the root cause of the acetone violation and review operations. During the inspection, Bioduro Jeronimo was in the process of investigating the root cause of the violation but reported that it was most likely caused by acetone used in the formulation for the spray drying step during production of a new R&D product. On July 27, 2023, Bioduro Jeronimo submitted their corrective action report attributing the root cause of the violation to residual runoff of acetone from the spray drying equipment during major cleaning in the facility washroom. As a corrective action, Bioduro Jeronimo implemented collection and disposal of any residual wastewater generated during the major cleaning step of this equipment and periodic internal safety audits to ensure proper collection of these wastewaters during this production process. On September 18, 2023, OC San issued an NOV for a May 2023 methylene chloride monthly average limit violation. On November 17, 2023, Bioduro Jeronimo submitted their corrective action report which attributed the methylene chloride violation to facility personnel inadvertently allowing rinsewater from a glassware cleaning step to discharge into a laboratory drain. As a corrective action, Bioduro Jeronimo implemented training of facility personnel on proper collection and disposal of solvent containing laboratory wastes.

Bioduro Jeronimo had no further violations during this reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

OC San will continue to monitor Bioduro Jeronimo'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 metal 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.

July 1 – December 31, 2023

On October 31, 2023, Bristol had a zinc violation, for which an NOV will be issued during the next reporting period.

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

**Cali Chem Inc. dba Be Beauty (Permit No. 1-601976)**

Cali Chem produces & packages various personal care products for the nail and spa industry (lotions, gels, scrubs, mineral oils & pastes). These products are blended on site and filled and packaged for sale to end users. The blending and packaging equipment is washed and discharged to the sewer.

Cali Chem also receives bulk material and fills acrylic gels and acetone into smaller packages for sale to end users. These are filled in dedicated lines and does not require any washing or changeouts.

July 1 – December 31, 2023

On October 12, 2023, Cali Chem had an O&G-min violation, for which an NOV was issued on October 30, 2023. A root cause analysis and corrective action report has been requested to be submitted by

November 30, 2023. On December 14, Cali Chem submitted their corrective action report where they attributed the cause of the violation to build up in their sampling point. As part of their corrective action, Cali Chem has implemented a cleaning scheduling once every 2 weeks.

OC San will continue enforcement during the next reporting period and will continue to monitor Cali Chem'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-based and animal-based oils. Wastewater is generated by steam cleaning of packaging equipment and washdown of loading, processing, and packaging areas. Pretreatment at the facility consists of a skim basin followed by clarification for the removal of oil and fat and pH adjustment.

In October 2019, OC San issued a compliance requirements letter requiring Cargill to develop a stormwater mitigation plan to divert stormwater from sewer discharge. In November 2019, with the assistance of their consultant, Cargill submitted their response to the compliance requirements letter. OC San reviewed the submittal and considered it to have adequately addressed the issues at the time. During a routine inspection in February 2021, OC San was informed that Cargill continued to discharge the 'first flush' of stormwater into the sewer system. OC San requested Cargill to provide detailed documentation of the procedures that Cargill had put in place to mitigate their stormwater discharge. Cargill submitted their response to OC San's request and Cargill confirmed that the 'first flush' continues to be discharged to the sewer.

In July 2021, OC San issued a compliance requirements letter for Cargill to provide a proposal to mitigate stormwater intrusion into the sewer system. In October 2021, Cargill submitted their proposal to modify certain existing structures to minimize stormwater discharge and to apply for a SPDP for the stormwater discharge. In December 2021, OC San conducted an inspection during a rain event and observed that stormwater was actively discharging into the sewer and an NOV was issued in March 2022 as a result. In March 2022, OC San rejected Cargill's proposal for an SPDP and requested an alternative proposal to be provided. Cargill then submitted a revised proposal to implement a revised operating procedure to manually divert stormwater from several areas during a storm event utilizing switchover valves. Cargill also proposed to reconfigure the piping in the boiler area to discharge directly to the waste treatment basin. Cargill did not provide any revised solution to mitigate the stormwater discharge from the rail track and east truck loading area. In May 2022, Cargill submitted a copy of their updated stormwater operating procedure.

After a compliance inspection in January 2023, OC San issued a compliance requirements letter accepting Cargill's proposal to operate diversion valves in various areas to prevent the discharge of stormwater to the sewer and to cap all sanitary sewer drains. OC San required Cargill to implement a system for easy visual identification of valve configuration and to provide a proposal to mitigate stormwater from the drains by the Rail Car area and a revised proposal for the Packing Truck Receiving area. While Cargill made some progress in posting sign for valve positioning, extensions were requested for other compliance schedule deliverables.

#### **July 1 – December 31, 2023**

OC San issued a response letter to Cargill's request on July 26, 2023, granting the extension and also to inform Cargill that an enforcement compliance schedule agreement (ECSA) was required due to the extensive duration required to complete the necessary installations and modifications. OC San mailed copies of the ECSA for Cargill's review and signatures on July 28, 2023, with a final completion date of February 28, 2024. On August 21, 2023, Cargill submitted a letter to OC San to request an extension to submit proposals to mitigate stormwater intrusion at the Rail Unloading Area, Packing Truck Receiving Area, and Rail Unloading Area to February 28, 2024. OC San accepted Cargill's request and granted the extension. In August 2023, OC San mailed the revised ECSA that reflects the new deadlines for Cargill's review and signature, to be returned by September 15, 2023. Upon review of their schedule, Cargill requested additional changes to compliance dates.

OC San continues to review Cargill's latest request for ECSA date changes and will continue enforcement actions during the next reporting period. OC San will continue to monitor Cargill's discharge and compliance status on a quarterly basis.

**Data Solder, Inc. (Permit No.1-521761)**

Data Solder, Inc. (DS) is a job shop printed circuit board manufacturing facility. Panels are typically masked upon arrival to the facility. The panels are pre-cleaned and processed on a conveyORIZED process line with a ferric chloride microetch and flux. Panels are then soldered in a HASL machine and post cleaned using clean city water. The HASL operation is a transport mechanism that submerges the panel in a reservoir of molten solder and then through jets of hot air, coating the exposed copper with solder. Residual flux is removed in a post clean operation.

Wastewater is accumulated through intermittent rinses associated with the cleaning operations, as well as batch treatment of the spent microetch solution. The wastewater treatment system includes continuous and batch treatment via hydroxide precipitation and flocculation, clarification, and neutralization. The sample box is above ground and has continuous pH monitoring.

**July 1 – December 31, 2023**

On July 12, 2023, OC San issued an NOV for the April 2023 monthly limit loading violation for lead.

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

**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. Wastewater is generated from equipment washdowns and clean-in-place processes. Wastewater drains to a floor trench in the facility that eventually drains to a three-stage clarifier, where the wastewater is pH adjusted prior to discharge.

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

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

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

During site inspections, OC San noted that the automated pH adjustment system had been installed but improvements to the sample point had not been completed. OC San issued a compliance requirements letter to address the sample point issue, followed by another compliance requirements letter addressing other site compliance issues including maintenance of the pH chart recorder, equipment redundancy, and a maintenance activity logbook. In October and November, 2020, Dr. Smoothie had further pH violations.

In March and April, 2021, Dr. Smoothie had further pH violations. OC San issued a compliance requirements letter which required Dr. Smoothie to attend a compliance meeting. The compliance meeting was held to discuss the inadequacy of the automated pH adjustment system and Dr. Smoothie's practices that caused these violations. In May 2021, OC San issued another compliance requirements letter requiring Dr. Smoothie to provide a proposal to address the inadequacy of their pH system, install audible and visual alarm system as well as an automatic shut off valve. Dr. Smoothie submitted their proposal to install a batch treatment process for their pH adjustment prior to discharging to the sewer in addition to the audible/visual alarms and automatic shut off valves, which OC San accepted.

In October 2021, Dr. Smoothie completed the installation of the pH adjustment system. However, in January 2022, Dr. Smoothie had another pH violation. Dr. Smoothie attributed this violation to the malfunction in their automatic shut off valve, alarms and chemical pumps, and low levels in their caustic drum. As their corrective action, Dr. Smoothie installed a key-operated switch on their control panel to prevent any bypassing of the automatic control valve, adjusted the dosing set point to achieve a pH between 8.5-9.5, and performing hourly check on the system.

#### July 1 – December 31, 2023

On July 10, 2023, OC San conducted a compliance inspection at the facility. During the inspection, OC San reviewed the fixed final stage pH probe that was the root cause of the violation. OC San verified that the pH probe is functioning accurately. Dr. Smoothie has also implemented a daily, weekly, and monthly preventative maintenance schedule of their system to ensure that all components of the system are functional. On September 26, 2023, Dr. Smoothie had another pH violation, for which an NOV was issued on October 4, 2023. A root cause analysis and corrective action report was submitted on October 20, 2023, attributing the violation to failing to place the system back in automatic mode after system maintenance was performed in manual mode. Dr. Smoothie has since performed a full verification of all the system valves and interlocks and did not observe any further issues.

OC San will continue enforcement during the next reporting period and will continue to monitor Dr. Smoothie's discharge and compliance status on a quarterly basis.

#### **Electrode Technologies, Inc. dba Reid Metal Finishing (Permit No. 1-511376)**

Electrode Technologies, Inc. dba Reid Metal Finishing (RMF), formerly listed as Reid Metal Finishing, 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. RMF 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. RMF's pretreatment system consists of chrome reduction, cyanide destruction, hydroxide precipitation and sludge filtration.

During 2022, RMF had violations for nickel, copper, and cadmium, which they attributed to damaged equipment. In January, April, and May of 2023, RMF had additional violations for cadmium but failed to provide any information related to a source or corrective actions. RMF has submitted multiple proposals that have failed to effectively address the non-compliance issues and provide a system to maintain long term compliance. RMF has also failed to provide a wastewater characterization report. Additionally, RMF continues to send concentrated floor wastes to the continuous treatment system, which contributed to discharge limit violations as a result of inadequate treatment. RMF has failed to address this issue and implement a solution to maintain compliance with discharge limits.

#### July 1 – December 31, 2023

On April 20 and 26, 2023, RMF had cadmium violations for which two NOV's were issued on July 24, 2023. On July 26, 2023, OC San issued an NOV for the April 2023 cadmium monthly average discharge limit violation.

On July 27, 2023, OC San conducted a compliance inspection in response to the April and May 2023 cadmium violations. RMF informed OC San certain floor wastes in the area of cadmium processing had been, and continue to flow, to the continuous pretreatment system. OC San noted that concentrated floor

wastes have the potential to cause slug discharges if automatically pumped to the continuous treatment system. OC San indicated RMF should characterize the concentration and volume of all floor wastes and that this information would be presented in the revised pretreatment system modification proposal. RMF inquired if the proposed tank size increase would be acceptable. OC San noted that while the increased tank size would increase retention time, the additional capacity does not effectively address non-compliance caused by concentrated floor wastes.

On August 3, 2023, OC San issued an NOV for the May 2023 cadmium monthly average discharge limit violation. On September 5, 2023, OC San issued an NOV for the June 2023 cadmium monthly average discharge limit violation.

On September 14, 2023, OC San received a preliminary pretreatment system proposal for the increased size of certain pretreatment processes; however, this proposal did not include the required wastewater characterization report of all wastestreams routed to the proposed pretreatment system, including floor wastes.

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

#### **Embee Processing (Anodize) (Permit No. 1-600456)**

Embee Processing (Embee) specializes in anodizing, chromating, cadmium plating, and passivation for aerospace, commercial, industrial, medical, military/defense, and transportation applications. Embee performs various operations on the parts, including general machining, grinding, honing, sand or glass-bead blasting, and surface masking prior to proceeding to the wet processes. The surface finishing generally proceeds by alkaline degreasing or acid deoxidizing; rinsing; finishing (Alodine, Boeing Seal, chromic anodize, color dye, dichromate seal, hard anodize, nickel seal, passivate, sodium dichromate, or sulfuric anodize); rinsing; mask removal; and drying. All wet finishing operations, including barrel, basket, hoist, rack, and wire process techniques, are manually controlled.

Wastewater is generated by acid/alkaline cleaning, black chromating, cadmium coating, cadmium plating, cadmium stripping, chromic dip, copper stripping, electrocleaning, Iridite, nickel strike, Nital hydrochloric etch, Nital hydroxide etch, rustproof dip, silver plating, silver strike, silver stripping, sour acid dip, titanium cadmium plating, Unichrome 95 A, and zinc phosphating. Also discharged through Embee's sampling point are batch-treated wastes generated from the chrome, zinc and nickel-plating operations in Building 2144, as well as RO rejects from two RO systems serving Embee's anodizing and cadmium plating operations.

Embee employs hexavalent chrome reduction, cyanide destruction, ion exchange for all continuous rinses, and a filter press for solids removal.

#### **July 1 – December 31, 2023**

On November 21, 2023, Embee had a violation for cyanide, for which an NOV will be issued in the next reporting period.

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

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

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

In January 2022, OC San observed that GKN was continuously running clean water into their trench drains to keep solids from building up, a violation of OC San's Ordinance Prohibition on Dilution. OC San also observed two different discharge points for GKN industrial waste that were not captured in its compliance sample point. GKN was also discharging industrial wastewater through wash sinks located in its other building that was not permitted. OC San issued an NOV in March 2022 to address these violations. OC San also requested GKN to submit a proposal for a representative sample point. In April 2022, GKN indicated that it had ceased the continuous discharge of clean water into the trench drains, wastehailed all generated wastewater from industrial sinks in Building 2, and was still working to identify a potential location for a representative sample point. GKN encountered several delays in submitting the proposal for the representative sample point and required several extensions.

#### July 1 – December 31, 2023

During a compliance meeting on July 13, 2023, GKN provided an overview of their proposal to install tees in their existing clarifier to increase solid settling in the clarifier. GKN also provided an overview of their proposed pilot testing to determine the most effective treatment technology to remove solids. The purpose of the pilot testing is to understand the nature of the solids, determining the appropriate filter bag size, and verify filter configuration to maximize solids removal. There were also discussions regarding having redundancies in place in the event of a system failure to avoid any treatment bypass prior to discharge. GKN estimates requiring more than 90 days to complete the proposed modification. On July 26, 2023, OC San issued a compliance requirements letter to summarize the meeting discussions and required GKN to submit a report of their pilot study and manufacturing process layout drawings by September 15, 2023, and to develop and submit a proposal for a pretreatment system by October 15, 2023. On September 15, 2023, GKN submitted their pilot study report and manufacturing process diagram. While the pilot study showed that a dual 4-bag filtration system utilizing 25 µm/ 0.5µm filters was effective at reducing the settleable solids in GKN's discharge, GKN noted that there is significant effort and time involved in maintenance and requested additional time to further evaluate the system. On November 1, 2023, OC San issued a compliance requirements letter that granted GKN the requested time to complete their pilot testing for an alternative treatment system and required GKN to submit a summary report by December 31, 2023.

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

#### **Gold Coast Baking Company, Inc. (Permit No. 1-601700)**

Gold Coast Baking Company, Inc. (Gold Coast Baking) produces baked goods consisting of loaves, rolls, and sliced breads. Bulk raw materials (a variety of flour, oils, yeasts, and additives) arrive onsite and are stored in process tanks or silos which are piped directly to the mixers. Ingredients are mixed and weighed according to recipes to form a dough. All loaf pans and sheet trays are sprayed with an emulsifier/oil mix prior handling the dough. The dough is formed and proofed prior to baking. Certain products like sourdough are required to proof or enter steam chambers prior to baking. After baking, the baked goods are allowed to cool prior to packaging, storage, and shipment to customers.

Wastewater is generated from the cleaning, washing, rinsing, and sanitization of the mixers, process equipment, totes, loaf pans/sheet trays, and floor wastes, as well as from the boiler blowdown. Wastewater collects in a large wet well on west side of the building outside of the maintenance shop. The wet well pumps to a four-stage underground clarifier with a sample box.

After permit issuance, Gold Coast Baking has consistently had pH violations in 2022 and lacked an effluent flow meter to measure industrial wastewater discharge. While Gold Coast submitted a proposal for an effluent meter in August 2022, Gold Coast Baking failed to submit a proposal for a pretreatment system even after receiving an extension for the compliance schedule. In December 2022, a sample during a compliance inspection showed compliance with pH limits; however, it was noted that noncompliance would likely continue given the lack of pH control and adjustment.

In 2023, after Gold Coast Baking and additional violations and failed to complete compliance requirements, OC San issued an NOV requiring Gold Coast Baking to attend a compliance meeting.

During the compliance meeting in June 2023, Gold Coast Baking noted that the original consultant was no longer available and that Gold Coast Baking had increased production recently. OC San reminded Gold Coast Baking of their requirement to maintain compliance with the permit conditions and discharge limits at all times.

July 1 – December 31, 2023

On July 19, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on September 18, 2023. On August 15, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on August 29, 2023.

On August 17, 2023, OC San issued a compliance requirements letter summarizing the June 7, 2023 compliance meeting and noted that OC San would draft an ECSA in order to ensure Gold Coast Baking implements the necessary pretreatment system to return to and maintain long term compliance. The ECSA will include specific dates for construction, acquisition, and installation of the required equipment (including an effluent flow meter).

On September 18, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on October 4, 2023. On October 16 and 17, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on October 25, 2023. On November 15, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on November 20, 2023.

OC San will continue enforcement during the next reporting period and will continue to monitor Gold Coast Baking's discharge and compliance status on a quarterly basis.

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

Graphic Packaging International, Inc. (Graphic Packaging) performs lithographic printing, cutting, folding, and gluing of paperboard. The facility discharges wastewater intermittently from the glue pot cleaning area, plating room, fountain solution under presses, and wash water from sinks when presses are being cleaned. Wastewater is primarily generated from water used to rinse baking compounds from lithologic plates, water used to wash and rinse glue pots with citrus-based cleaner, and water used at each printing press. Graphic Packaging also has a chiller, soft water and reverse osmosis systems that generate wastewater. Wastewater from the glue room, plating room, and fountain solutions are pH adjusted and monitored prior to discharge to the sewer.

July 1 – December 31, 2023

On December 4, 2023, Graphic Packaging had a pH violation for which an NOV was issued on December 14, 2023.

OC San will continue enforcement during the next reporting period and will continue to monitor Graphic Packaging'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. Wastewater 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 tank. Wastewater is discharged from the pretreatment system via gravity flow through a three-stage underground clarifier and sample box located outside the facility.

July 1 – December 31, 2023

On July 12, 2023, Harbor Truck had an instantaneous and daily maximum violation of molybdenum, for which an NOV was issued on July 25, 2023. On August 21, 2023, OC San performed a compliance inspection to investigate the root cause of these molybdenum violations, collect a resample, and review

facility operations. During the inspection, Harbor Truck attributed these violations to using a new phosphate solution (Hotsy Phosphatizer No. 2) for surface washing and phosphate conversion coating spray treatment. According to Harbor Truck, the Safety Data Sheet for the new phosphate solution identified sodium molybdate dihydrate as a base material of the new phosphate solution, which is a source of molybdenum. On August 22, 2023, Harbor Truck submitted their corrective action report, which included replacement of the new molybdenum-based phosphate solution with a non-molybdenum-based solution (Secure Steam FRP) and procuring a contractor to pump out the clarifier of residual solids. Results from the resample showed an instantaneous and daily maximum limit violation of molybdenum for which an NOV was issued on September 11, 2023. On August 8, 2023, Harbor Truck had instantaneous and daily maximum discharge limit violations for molybdenum, for which an NOV was issued on September 12, 2023. Harbor Truck attributed these subsequent violations to residual molybdenum within the clarifier due to prior use of the new molybdenum-based phosphate solution.

Following implementation of the corrective actions, Harbor Truck had no further violations during the reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

#### **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 being 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.

#### **July 1 – December 31, 2023**

On May 17, 2023, Hightower had a cyanide daily average violation, for which an NOV was issued on August 1, 2023. OC San issued another NOV on August 1, 2023, for the monthly cyanide violation from May 2023. A subsequent compliance inspection was performed on August 22, 2023, by OC San to determine the root cause of the violation. During the inspection, Hightower noted that it believed that there was potential for residual cyanide to remain in a pump and its flexible hose that is occasionally shared with another process. As a result, Hightower has purchased and installed a second pump that is dedicated to the cyanide-bearing wastewater. Hightower also noted that the filter press used for cyanide treatment is shared with other processes. Hightower has since updated its Standard Operating Procedures (SOP) to disconnect and to rinse the filter press following any treatment resulting in cyanide-containing solids and to convey the filtrate and rinse water to the evaporator holding tank with the contents being wastehauled. This process will be implemented every time cyanide-bearing wastewater is conveyed to the filter press.

Hightower provided a corrective action report to OC San on September 22, 2023, and the additional SOP on December 1, 2023, documenting the corrective actions noted above that were taken to address any system deficiencies that caused the violation. This solution is anticipated to increase long-term compliance by reducing the possibility of cyanide escaping from its recycled process and comingling in the wastewater discharge.

OC San is drafting a compliance requirements letter, accepting the corrective actions and requiring the submittal of an updated operation and maintenance manual, which will be issued in the next reporting period.

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

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

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

In May 2021, OC San conducted a compliance inspection where OC San noted potential stormwater intrusion through the open-top outdoor tanks used in Howmet's pretreatment system. OC San issued a compliance requirements letter in June 2021, requiring Howmet to submit a proposal to mitigate stormwater and runoff from entering the sewer. In July 2021, Howmet proposed to install a canopy over their entire wastewater treatment system and submitted their final canopy design in November 2021, which OC San accepted. Howmet had since informed OC San that they were experiencing delays in obtaining building permits from the City of Fullerton. In May 2022, Howmet had submitted the required plans to the City of Fullerton and is currently waiting for a response from the city. In the interim, Howmet installed temporary canopies above their wastewater treatment system.

#### **July 1 – December 31, 2023**

As of September 19, 2023, Howmet had completed the installation of the canopy over their wastewater treatment system. On December 1, 2023, an NOV was issued for Howmet's violation of their monthly cyanide amenable limits for the month of September 2023. A root cause analysis and corrective action report was requested to be submitted by December 31, 2023. On December 12, Howmet informed OC San via email that they were unable to determine the cause of the violation; however, Howmet proposed to install an IX system after the cyanide destruction tanks as a final polishing step. OC San is currently reviewing this proposal and is awaiting additional information and specification related to the proposed IX system.

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

#### **HSH Interplan USA, Inc. (Permit No. 1-602025)**

HSH Interplan USA, Inc. (HSH Interplan) formulates water-based paints and pigments, spray paints resin substrates, and repackages cleansers and degreasers for distribution. Wastewater generated from equipment cleaning discharges to a holding tank for sedimentation. The supernatant is discharged to the sewer, and the solid waste is collected for offsite disposal.

#### **July 1 – December 31, 2023**

On November 9, 2023, OC San conducted an inspection of HSH Interplan as part of the industrial waste survey program. Based on information gathered during this inspection about process operations and wastewater discharged to the sewer, OC San issued an NOV on December 19, 2023, to HSH Interplan for discharging wastewater without a valid permit. OC San directed HSH Interplan to submit a permit application by January 15, 2024.

OC San will continue enforcement during the next reporting period and will continue to monitor HSH Interplan's discharge and compliance status on a quarterly basis.

**J&J Marine Acquisition Co., 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. J&J Marine also has the capability to collect and store stormwater throughout the facility (rather than discharging to the Newport Beach Harbor) and reuse it in the boat washing and cleaning process. This wastewater is then treated and discharged to the sewer. Stormwater that is not captured for reuse is also treated and discharged to the Newport Beach Harbor.

**July 1 – December 31, 2023**

On September 27, 2023, J&J Marine had copper and zinc violations, for which an NOV was issued on October 20, 2023.

On November 16, 2023, OC San conducted a compliance inspection and 30-day resample at J&J Marine. J&J Marine noted that they had not intended to discharge wastewater to the sewer during the OC San sampling event on September 27, 2023. J&J Marine stated that it can reuse the wastewater in various operations, allow the wastewater to evaporate, or treat and discharge the wastewater to the sewer. OC San informed J&J Marine it is not required to discharge during routine and unannounced sampling activities, but the wastewater discharged to the sewer is sampled and monitored for compliance. J&J Marine noted the wastewater was treated; however, the concentration appeared compliant using the handheld onsite calorimeter copper testing unit. J&J Marine will conduct additional confirmatory testing with the in house testing and will alert OC San if it intends to discharge wastewater to the sewer during routine sampling activities.

J&J Marine had no further violations during this reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

OC San will continue to monitor J&J Marine Acquisition's discharge and compliance status on a quarterly basis.

**Koia Anaheim Facility, LLC (Permit No. 1-601767)**

Koia Anaheim Facility, LLC (Koia) blends raw ingredients with water to make plant-based beverages. Wastewater generated from clean-in-place (CIP) and equipment rinses, steam sterilization, and boiler blowdown discharges to a multi-stage clarifier, a final discharge compartment, and then to sewer. The facility utilizes an automated pH adjustment system, which applies caustic or sulfuric acid to the clarifier's first stage.

In January 2023, OC San conducted a compliance inspection to investigate the pH violations that occurred in December 2022. Since Koia could not readily identify the cause for the pH violations, it was determined that the current pH adjustment system lacking sensors and control, cannot provide long term compliance with discharge limits. As a result of Koia's failure to notify OC San of process changes involving opening a facility manhole and using flex hosing to optimize effluent discharge, OC San issued an NOV in Feb 2023 for failure to comply with permit conditions.

In response to a compliance requirements letter in February, 2023, Koia submitted several proposals to increase the pretreatment system's hydraulic capacity between March and June, 2023; however, each proposal was rejected by OC San as they did not ensure sufficient hydraulic retention for adequate pH adjustment.

During a compliance inspection in June 2023 to investigate a pH violation from April 2023, Koia attributed the pH violation to empty pH adjustment chemical tanks, and the facility retained its personnel and instituted weekly monitoring of its pretreatment chemical inventory.

**July 1 – December 31, 2023**

As a result of continued noncompliance and failure to provide a system to ensure long term compliance, OC San issued a compliance requirements letter on December 5, 2023, directing Koia to attend a compliance meeting on December 19, 2023. During the compliance meeting, Koia and OC San discussed pretreatment and the facility's recent proposals for adequate pH adjustment. While Koia has

proposed to increase hydraulic capacity and retention, operating parameters specific to peak flowrate and facility discharge remain unclear, thus impacting design assessment and review. OC San has drafted a compliance meeting summary and requirements letter that will be issued in the next reporting period.

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

#### **La Habra Bakery (Permit No. 1-031029)**

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

#### **July 1 – December 31, 2023**

On October 26, 2023, La Habra Bakery had a pH violation for which an NOV was issued on November 9, 2023. On November 22, 2023, OC San conducted a compliance inspection to investigate the root cause of the violation, collect a resample to verify compliance, and review facility operations. During the inspection, La Habra Bakery attributed the violation to low levels of sodium hydroxide in the caustic tank available onsite for pH adjustment due to a chemical supply chain issue with their existing vendor. OC San verified during the inspection that the caustic tank was been replenished with sodium hydroxide and the pH adjustment system had been returned to normal operation. On December 6, 2023, La Habra Bakery submitted their corrective action report, which included contracting with a new chemical supply vendor to ensure the supply of sodium hydroxide is not interrupted and implementing a new maintenance procedure for operators to check the caustic tank level on a weekly basis. Resample results demonstrated compliance with pH discharge limits.

La Habra Bakery had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed.

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

#### **Linco Industries, Inc. (Permit No. 1-021253)**

Linco Industries, Inc. (Linco) strips paint and organic coatings from aluminum and steel parts provided by customers. Formerly, Linco stripped coatings in cold and hot strip baths. However, in April 2022, Linco removed the facility's cold strip process line.

Current operations include molten salt bath immersion, bright dipping, and rinsing. The molten bath is comprised of potassium permanganate, potassium hydroxide, and sodium nitrate chemistry and heated to 550 degrees Fahrenheit. The facility uses sulfuric acid and muriatic acid for bright dipping.

In June 2023, Linco transitioned to batch treatment. The facility discharges rinsewater and spent process solution to one of three available batch treatment tanks for cyanide destruction and metals precipitation. The facility discharges batch treated contents through one of two available filter presses, to the compliance sample point, and then to sewer. Linco collects the filter cake for offsite disposal.

#### **July 1 – December 31, 2023**

On July 19, 2023, August 16, 2023, and October 30, 2023, OC San issued NOVs for cyanide violations that occurred in the previous reporting period. On July 31, 2023, Linco submitted a waste management proposal to ensure adequate treatment of wastestreams and long term compliance.

On August 3, 2023, Linco had daily average cadmium and cyanide violations for which an NOV was issued on September 19, 2023. On September 21, 2023, OC San conducted a compliance inspection to investigate recent heavy metal and cyanide violations, at which time, Linco attributed the violations to a tear in the facility's filter press filter cloth. Separately, Linco indicated personnel have experienced difficulty maintaining prescribed treatment parameters. While Linco reported facility personnel had

repaired the filter press, there are several concerns with Linco's pretreatment. Specifically, waste characterization used to formulate pretreatment chemistry may not accurately demonstrate the extent of pollutant contamination in the facility's wastestreams, and a variance in treatment parameters may result in incomplete or inadequate treatment. As a result, OC San has drafted a compliance requirements letter that directs Linco to attend a compliance meeting that will be issued in the next reporting period.

On September 22, 2023, Linco had a daily average cyanide violation for which an NOV was issued on October 20, 2023. On October 17, 2023, Linco had instantaneous and daily average cyanide violations for which an NOV was issued November 21, 2023. On November 2, 2023, OC San issued an NOV for August's monthly average cyanide and cadmium violations. On December 6, 2023, OC San issued an NOV for September's monthly average cyanide violation. In October 2023, Linco had a monthly average cyanide violation for which an NOV will be issued in the next reporting period.

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

### **Markland Manufacturing, Inc. (Permit No. 1-011046)**

Markland Manufacturing, Inc. (Markland) performs metal finishing operations on motorcycle parts for companies such as Kawasaki and Harley Davidson. Markland's operations involve manufacturing finished assemblies on customer supplied parts. Manufacturing operations typically begin with machining, shearing, stamping, sawing, or cutting raw stock materials, primarily hot and cold rolled steel, to produce the subcomponent parts for fabrication of the products. Some of these subcomponents will undergo wet vibratory deburring, while much of the tubing will undergo precision bending using hydraulic computer numerical control equipment. The subcomponents are then welded to form a fabricated part or assembly. After fabrication, the parts are directed to the polishing department to remove minor surface imperfections. The parts are then processed through automated plating lines for cleaning followed by nickel or chrome surface finishing. Customer supplied parts, such as aluminum die cast forks, undergo multifaceted process steps including hole plugging, cleaning, etching, copper plating, dry polishing, zincate plating, and nickel or chrome surface finishing. After plating, the parts are directed to final inspection, assembly, packaging, and shipping. The effluent discharge at Markland is generated by the various spent cleaning, plating, and stripping solutions, and the associated rinse wastestreams.

In May of 2023, Markland notified OC San it would be ceasing operations in the near future. OC San provided Markland instructions for close of business procedures.

#### **July 1 – December 31, 2023**

On September 7, 2023, OC San issued an NOV for failing to comply with permit conditions as Markland failed to notify OC San that it had ceased operations and had begun removing manufacturing process equipment and on-site chemicals. OC San required Markland to provide a Site Closure Plan no later than September 14, 2023.

On September 8, 2023, Markland sent OC San a document titled "Closure Plan for Fixed Treatment Units" (Closure Plan) dated June 23, 2023. This Closure Plan was drafted for and submitted to the Orange County Health Care Agency (OCHCA) and did not contain the information required in the Site Closure Plan requested by OC San in the letter dated September 7, 2023. On October 9, 2023, OC San issued an NOV for failure to comply with the requirements issued in the NOV from September 7, 2023. The NOV required Markland to submit the Site Closure Plan as specified in the September 7, 2023, no later than October 18, 2023. OC San also required Markland to attend a compliance meeting on October 18, 2023.

During the compliance meeting on October 18, 2023, Markland discussed several topics including the Site Closure Plan, additional wastestreams, dilution, batch treatment logs, recent inspection notes, on-site analytical testing capabilities, and the potential misalignment between Markland management and waste treatment operators. OC San reminded Markland of the prohibitions on dilution as a form of treatment and unpolluted water, its permit conditions, and batch discharge requirements.

On October 20, 2023, OC San issued a compliance requirements letter summarizing the compliance meeting and requiring Markland to submit a wastewater characterization of any additional wastewater remaining during site closure activities, and information confirming certification of waste treatment operator(s).

On October 20, 2023, OC San received a Request to Close Account Form from Markland, indicating Markland would be ceasing operations and wastewater discharge on October 23, 2023. On October 23, 2023, OC San issued a permit closure letter, notifying Markland that the wastewater discharge permit had been void and Markland was no longer authorized to discharge industrial wastewater to the sewer.

Markland had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed. OC San will continue to monitor the site for illicit discharge as facility clean-up continues.

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

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

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

In January 2021, McKenna had a zinc violation. McKenna attributed the violation to improper cleaning procedures for their bottling equipment. In April 2021, OC San was informed that the effluent meter was damaged due to excavation work around the area and that McKenna had to bypass the compliance sample point and divert the wastewater into a drum before discharging into the sewer, which is prohibited by OC San's Ordinance. OC San conducted a compliance inspection in April 2021, during which OC San reviewed the current discharge configuration and established an interim compliance sample point until a permanent solution is implemented. In May 2021, OC San issued a compliance requirements letter requiring McKenna to provide a proposal to measure the volume of wastewater discharged, a proposal for the location of a representative sample point for the interim and permanent system, and a formal proposal for the planned modifications to their system. McKenna submitted their proposal to install a new flowmeter, a grease interceptor, and a new sampling location downstream of the interceptor, which OC San accepted.

#### **July 1 – December 31, 2023**

On September 6, 2023, McKenna had a zinc violation, for which an NOV was issued on October 4, 2023. A root cause analysis and corrective action report was submitted on October 20, 2023. McKenna attributed the violation to inadequate identification of equipment used to transfer zinc product from a mix tank, and rinsewater from the cleaning of this equipment was not captured and disposed of separately. As a corrective action, McKenna will implement new identification systems to include both a visual stamp and a placard label of all equipment processing zinc product. Additionally, McKenna is also looking into installing a pretreatment system to remove zinc from their discharge.

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

#### **Micrometals, Inc. (Permit No. 1-021153)**

Micrometals Inc. (Micrometals) is a manufacturer of iron and iron/nickel inductor cores for use in power conversion and line filters for the electronics industry. The wastewater generated at Micrometals consists of vibratory deburring solutions, which is drained out of each bowl into a trench running through the wet

process area, along with wastewater from two rinses prior to iron phosphate, plus small amounts of wash water from a sink in the shop. The wastewater is routed to a two-stage clarifier before discharge to the sewer.

July 1, 2023 – December 31, 2023

On July 18, 2023, OC San issued an NOV for the lead mass violation from the previous reporting period. On August 1, 2023, OC San conducted a compliance inspection, at which time, OC San noted portions of the facility's wastewater conveyance trench were uncovered creating a potential for unauthorized material to discharge to the sewer and cause noncompliance issues. On August 14, 2023, OC San issued a compliance requirements letter that directed Micrometals to submit a corrective action report to ensure long-term compliance with permitted limits for wastewater discharge. On September 5, 2023, OC San issued an NOV for June's monthly average lead mass violation. On September 13, 2023, Micrometals submitted a corrective action report that attributed the mass violations to clarifier sediment and inadequate preventative maintenance. Moreover, the facility indicated several raw material powders contain lead. As corrective actions, Micrometals collected the clarifier's contents for offsite disposal, and instituted routine clarifier maintenance. Further, Micrometals covered its conveyance trench and hard-plumbed its wastewater to the facility's clarifier. After a review, OC San has determined the proposed mitigative measures do not ensure long-term compliance with permitted limits for wastewater discharge as Micrometals does not employ pretreatment controls to effectively remove dissolved heavy metals that may result from on-site operations. Therefore, OC San has drafted a letter that directs Micrometals to submit a proposal to install treatment technology or controls such that the facility meets the permitted lead limits before discharging wastewater to the sewer.

OC San will continue enforcement during the next reporting period and will continue to monitor Micrometals' discharge and compliance status on a quarterly basis.

**Omni Metal Finishing, Inc. (Permit No. Z-601973)**

Omni Metal Finishing, Inc. (Omni) performs electroplating, surface finishing, and painting of customer-supplied parts made of aluminum, brass, copper, Inconel, mild and stainless steel, titanium, magnesium, and tungsten alloys. Omni operates out of six buildings on Coley River Circle in Fountain Valley. Omni has a Class I permit for 11639 Coley River Circle (Building 4) and a zero discharge certification for 11665 Coley River Circle (Building 1). Omni's three other buildings located on Coley River Circle do not have wet operations: 11688 Coley River Circle (Building 2), 11711 Coley River Circle, Suite 2 (Building 3), and 11640 Coley River Circle (Building 6).

July 1 – December 31, 2023

On August 14, 2023, the City of Fountain Valley Fire Department (FVFD) contacted OC San to report plating operations located at 11615 Coley River Circle (Building 5). FVFD observed large horizontal tanks that appeared to be copper plating, nickel plating, and zinc plating, but unable to determine if there was industrial wastewater being discharged to the sewer from the plating operations occurring in Building 5. Omni staff were interviewed by FVFD and confirmed that an unpermitted plating operation was occurring in Building 5.

OC San staff also conducted an inspection of Omni on August 14, 2023. While Omni had previously indicated that Building 5 was used for storage, seven large horizontal tanks were found with various contents including hard anodize, deoxidizer, alkaline, nickel acetate, and associated rinses. Omni staff explained that oversized aerospace parts are processed in these tanks. Rinsewater is used to replenish the heated process tanks due to evaporation and wastewater is not discharged to the sewer from the operations in Building 5.

Based on the observed operations in Building 5 during the inspection, Omni is subject to the Metal Finishing Point Source Category as defined by the Environmental Protection Agencies (EPA's) Effluent Guidelines and Standards Chapter of the Code of Federal Regulations (CFR), Part 433.

On September 11, 2023, OC San issued a compliance requirements letter, requiring Omni to submit an application to obtain a zero discharge certification for categorical operations housed in Building 5. After receiving the application, the zero discharge certification was issued on December 1, 2023.

No further action is required at this time and this enforcement case is closed. OC San will continue to monitor Omni's discharge and compliance status on a quarterly basis.

#### **Pacific Image Technology, Inc. (Permit No. 1-021070)**

Pacific Image Technology, Inc. (Pacific Image Technology) manufactures printed circuit boards. Operations include image printing, developing, etching, and photopolymer resist stripping. The facility discharges rinsewater from the developer and photopolymer resist strip module to the sample point and sewer and collects spent process solution for offsite disposal. While Pacific Image Technology maintains a pH probe and chart recorder to monitor pH compliance at the sample point, the facility does not employ any form of chemical pretreatment prior to discharge.

#### **July 1 – December 31, 2023**

On August 7, 2023, OC San issued an NOV for instantaneous and daily average copper violations that occurred on July 26, 2023. On August 30, 2023, Pacific Image Technology submitted a corrective action report that attributed the violations to poor solids management. As corrective actions, Pacific Image Technology collected the solids that accumulated in the compliance sample point for offsite disposal and updated the facility's preventative maintenance program to include semiannual sample point maintenance. On October 4, 2023, OC San issued an NOV for the July 2023 copper monthly average discharge limit violation. On October 10, 2023, OC San conducted a compliance inspection to investigate the copper violations. Based on site observations and a thorough review of Pacific Image Technology's corrective action report, OC San determined the facility's proposed corrective actions will not ensure long-term compliance with permitted limits for wastewater discharge. On November 30, 2023, OC San issued a compliance requirements letter, requiring Pacific Image Technology to submit a waste management proposal to collect all metal-bearing wastewater for offsite disposal, or to install pretreatment technology equivalent to or better than Best Available Technology (BAT).

OC San will continue enforcement during the next reporting period and will continue to monitor Pacific Image Technology's discharge and compliance status on a quarterly basis.

#### **Patriot Wastewater, LLC (Freedom CWT) (Permit No. 1-521861)**

Patriot Wastewater, LLC (Patriot) is a centralized wastewater treatment (CWT) facility that accepts and treats only non-hazardous waste from off-site generators. Patriot treats both CWT and non-CWT wastewater (as defined in 40 CFR 437.2), under separate permits and discharge points. As a CWT Subpart D facility, Patriot is able to treat wastes from Subparts A, B, and C: Metals, Oil, and Organics Treatment and Recovery. Depending on the wastewater that is received, Patriot can employ one of multiple on-site technologies including: (1) batch heavy metals precipitation; (2) oil water separation with emulsion breaker; and (3) granular activated carbon, treated organo-clay, and bag filters for organics treatment.

As a result of a violation for the 4-methylphenol monthly average discharge limit, Patriot noted the increased 4-methylphenol concentration was likely from a landfill leachate waste profile. Patriot will continue to perform additional in-house analytical testing for concentration verification, and instituted protocols to perform additional and voluntary sampling if need be for a particular constituent which may be above the monthly average discharge limit.

#### **July 1 – December 31, 2023**

On November 16, 2023, Patriot had a violation for arsenic, titanium, and 4-methylphenol, for which an NOV was issued on December 21, 2023. This violation caused an exceedance of the 4-methylphenol monthly average discharge limit for November 2023, for which an NOV will be issued in the following reporting period.

On December 6, 2023, Patriot had another 4-metholphenol, for which an NOV was issued on December 21, 2023. This violation caused an exceedance of the 4-methylphenol monthly average discharge limit for December 2023, for which an NOV will be issued in the following reporting period.

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

#### **Performance Powder, Inc. (Permit No. 1-521805)**

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

In June 2023, OC San issued an NOV for March's zinc monthly average violation and followed up with a compliance inspection to investigate the zinc violation.

#### **July 1, 2023 – December 31, 2023**

On July 3, 2023, Performance Powder submitted a corrective action report; however, the report contained several deficiencies concerning the violation source and related mitigative measures. As a result, OC San directed Performance Powder to resubmit the corrective action report. Between July and October 2023, Performance Powder submitted multiple corrective action reports to ensure long-term compliance with permitted limits for wastewater discharge. Despite several revisions, related deficiencies continued. On August 2, 2023, OC San issued an NOV to Performance Powder for the monthly average zinc violation in May 2023. On November 3, 2023, Performance Powder submitted a corrective action report that addressed prior submittal deficiencies. The facility attributed non-compliance to production changes and a general lack of maintenance. Further, Performance Powder proposed to install a conical bottom settling tank to promote sedimentation, to update the facility's preventative maintenance program to remove solids from the pretreatment system on a more frequent basis, to install a new sample box, and to conduct routine effluent analysis to verify compliance. OC San accepted Performance Powder's proposal on December 21, 2023.

As a result of the zinc violation, self-monitoring requirements for zinc will be increased from quarterly to monthly.

OC San will continue enforcement during the next reporting period and will continue to monitor Performance Powder's discharge and compliance status on a quarterly basis.

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

Pioneer Circuits, Inc. (Pioneer) is a full service printed circuit board shop offering design, manufacturing, and assembly for aerospace, industrial, and military/defense applications. 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 leveling or fuse-oil reflow complete Pioneer's wet process operations. The wastewater discharge at Pioneer is generated by aqueous fume scrubbing, boiler blowdown, reverse osmosis reject, various spent process solutions, and the associated rinse wastestreams.

July 1, 2023 – December 31, 2023

On October 10, 2023, Pioneer had a lead violation, for which an NOV was issued on November 15, 2023. This violation also resulted in a violation of the monthly average discharge limit for lead. On November 27, 2023, OC San received corrective action report from Pioneer. Pioneer noted that valves associated with certain rinse tanks were not correctly operational causing lead buildup. Pioneer repaired the valves once the problem was determined. Subsequent sampling has demonstrated compliance with discharge limits.

Pioneer had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed.

OC San will issue an NOV for the lead monthly average discharge limit violation for October 2023 during the next reporting period and continue to monitor Pioneer's discharge and compliance status on a quarterly basis.

**Power Distribution, Inc. (Permit No. 1-511400)**

Power Distribution, Inc. (PDI) designs and manufactures power transformers and power distribution systems. Manufacturing consists of metal fabrication from sheet and bar stocks into assembled electrical equipment. Ferrous and nonferrous metals are cut, stamped, formed, welded, and bolted into complex shapes making enclosure and electrical equipment. The transformer manufacturing process assembles component metal, paper, and plastic parts into transformers which are baked, varnished, tested, and either sold at that stage or assembled into higher level electrical assemblies. The manufacturing process is a dry operation, in general. Wastewater is generated from a water jet cutting process that use a mixture of water and abrasive garnet to cut insulation as well as metal sheet and bar materials. Wastewater from this process contains suspended particles of the garnet abrasive and the material being cut. Wastewater passes through a small clarifier to settle out particles prior to discharge to the sewer.

July 1, 2023 – December 31, 2023

On June 6, 2023, PDI had a copper discharge limit violation, for which an NOV was issued on July 10, 2023. PDI noted this exceedance occurred as a result of the clarifier downstream of the water jet cutting process not being cleaned in several months due to employee turnover.

OC San staff conducted an inspection on August 23, 2023, noting that the Waterjet cutting machine was locked out and no longer discharging to the sewer; PDI stated that they were intending to cancel their wastewater discharge permit. On August 24, 2023, OC San received a corrective action letter from PDI noting the water jet cutting process would be removed from operation, which would eliminate all wastewater discharge to the sewer. On August 25, 2023, OC San received a Request to Close Account Form, noting that the Waterjet cutting machine had been locked out and was scheduled for removal on October 31, 2023.

On October 31, 2023, OC San issued permit closure letter, noting that PDI's wastewater discharge permit would be void on October 31, 2023.

**PowerDrive Oil & Gas Company, LLC (2nd) (Permit No. 1-600248)**

Powerdrive Oil & Gas Company, LLC (Powerdrive) is an oil extraction company. A mixture of crude oil and brine water are pumped from the ground through nine wells to a wash tank where the oil and water are allowed to separate. The separated crude oil is decanted from the top of the wash tank to an oil storage tank, and the water gravity flows through a process flow meter and a three-stage clarifier before discharging to the sewer.

July 1 – December 31, 2023

On October 9, 2023, the City of Huntington Beach (City) notified OC San of a potential overflow from a sewer at a residential property adjacent to Powerdrive. The resident property manager stated that oil was observed backing up and overflowing from the downstairs toilet and bathtub on Friday, October 6, 2023.

On October 9, 2023, an inspection was conducted by OC San at Powerdrive and the surrounding area. OC San observed heavy staining from what appeared to be crude oil on the floor and oil-stained footprints near the entrance of the residence. The City noted that contractors attempted to clean the line but were unsuccessful due to a heavy black grit deposit blocking the sewer lateral from the residence to the sidewalk where the local sewer line is located.

On October 10, 2023, OC San returned to the site and observed an excavation, revealing part of the residential lateral line to find blockage in the lateral. Due to the heavy black grit blockage observed, the City conducted a second excavation and verified that the residential lateral connects to a chimney (vertical) section and that the chimney was also blocked. After receiving consent from Powerdrive, OC San assisted by performing a dye test from Powerdrive's industrial discharge line and verified that flow from Powerdrive's sample point accumulates at the excavated location.

Based on information gathering during inspections, OC San issued an NOV to Powerdrive on December 6, 2023, for creating an obstruction and a public nuisance, in violation of OC San Class I Wastewater Discharge Permit No. 1-600248 and OC San's Ordinance.

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

#### **Prima-Tex Industries Inc. (Permit No. 1-031036)**

Prima-Tex Industries, Inc. (Prima-Tex) 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 (used to break some of the small fibers on the exterior of the material which teases them out to produce a soft feel), a crinkling machine (to artificially wrinkle the cloth), and two industrial washing and drying machines, used to test the fabric quality when the cloth is supplied by the customer. Wastewater discharges to an outside sump, before being pumped through a lint removal unit. The pump delivers wastewater to the inside of a rotating drum 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.

#### **July 1 – December 31, 2023**

On August 16, 2023, Prima-Tex had a zinc violation, for which an NOV was issued on September 11, 2023. On September 21, 2023, OC San received an Appeal Request as Prima-Tex submitted the provided split sample to a third-party laboratory, and the results demonstrated compliance with the zinc discharge limits.

OC San's laboratory analyzed the archive sample which confirmed levels of zinc above the permitted discharge limit. On November 9, 2023, OC San issued an appeal response letter, indicating the NOV was valid as the archive sample results confirmed the zinc discharge limit violation.

OC San will continue enforcement during the next reporting period and will continue to monitor Prima-Tex's discharge and compliance status on a quarterly basis.

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

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

### July 1 – December 31, 2023

On September 19, 2023, Q-Flex had a violation for Total Toxic Organics (TTOs), for which an NOV was issued on October 20, 2023. Q-Flex could not readily identify the source of the TTO violation, but retrained all employees on proper TTO handling, storage, and disposal.

In September 2023, Q-Flex exceeded the monthly average discharge limit for copper, for which an NOV was issued on December 1, 2023.

OC San will continue enforcement during the next reporting period and will continue to monitor Q-Flex's discharge and compliance status on a quarterly basis.

### **RBC Transport Dynamics Corp. (Permit No. 1-011013)**

RBC Transport Dynamics Corp. (RBC) is a large captive machine shop, which manufactures journal and spherical bearings, rod ends, and custom engineered assemblies for aerospace, automotive, and commercial applications. The effluent discharge at RBC is generated exclusively by the facilities vibratory deburring operation. Wastewater from the vibratory deburring operation flows through two, 200-gallon aboveground clarifiers prior to discharge. RBC also installed one ion exchange/mixed media tank downstream of the vibratory deburring operation to remove any residual dissolved metals not settled by the aboveground clarifiers. All rinse water from the facilities anodizing and plating processes and air scrubber bleed streams are routed to a large Enco evaporation unit. All spent chemicals are wastehauled off site. An ion exchange column is used to treat spray rinse water from the cadmium plate process for cyanide/cadmium removal, then discharged into the evaporator collection sump. Built up sludge from the evaporator is removed and stored in a sludge holding tank before being wastehauled offsite.

On January 25, 2022, OC San issued an NOV for the cadmium violation which occurred on December 6, 2021. On January 18, 2022, RBC had another cadmium violation, for which an NOV was issued on March 1, 2022. This violation resulted in a monthly average discharge limit violation for cadmium for the month of January 2022, for which an NOV was issued on April 5, 2022. On March 3, 2022, OC San issued an NOV for the December 2021 monthly average discharge limit violation for cadmium. On February 14, 2022, OC San received a letter from RBC detailing the explanation for the TTO and cadmium violations.

Regarding the TTO violation, RBC conducted an investigation to determine if any chemicals throughout the facility contained chloroform or chloromethane, which did not provide any conclusions. RBC installed signage at various locations throughout the facility where the potential to introduce and dispose of chemicals which flow to the designated sample point were observed and instructed all employees to follow proper waste disposal practices.

With regard to the cadmium violations, RBC removed the floor grating above the sump tank leading to the designated sample point located in the plating room, and a residue was discovered on top of these tank covers. RBC concluded that there may have been some drag-out from the cadmium plating process which was flowing to the sample point. RBC replaced the tank covers and refabricated them to completely seal the tanks and not allow external materials to enter the waste stream.

In early 2022, RBC had cadmium and TTO violations. As a result, RBC added signage and retrained employees on proper waste disposal to address the TTO noncompliance and replaced tank covers to completely seal tanks that had been impacted by drag-out rinse water to address the cadmium noncompliance.

In July 2022, RBC had a monthly zinc violation. It was determined that zinc plated parts were being processed in both the tumbling and deburring operations, which flows to the designated sample point. RBC eliminated the process of placing zinc-plated parts in the tumbling and deburring machines.

### July 1 – December 31, 2023

On September 13, 2023, RBC had a cadmium violation, for which an NOV was issued on October 4, 2023. This violation resulted in a monthly average discharge limit violation for cadmium for the month of September 2023, for which an NOV was issued on December 1, 2023. On October 2, 2023, RBC had

another cadmium violation, for which an NOV was issued on November 20, 2023. This violation resulted in a monthly average discharge limit violation for cadmium for the month of October 2023, for which an NOV will be issued during the next reporting period.

On October 17, 2023, OC San received a root cause and correction action letter in which RBC could not determine the exact cause of the elevated cadmium concentrations. As corrective actions, RBC performed a full pump-out and cleaning of the two above-/belowground clarifiers and designated sample point, contacted an environmental consultant, and ordered an additional cadmium-specific mixed media removal column, and elected to remove all cadmium processes from operation.

On November 2, 2023, RBC had another cadmium violation. OC San will issue the NOV during the following reporting period. On November 9, 2023, RBC had another cadmium violation, for which an NOV was issued on November 30, 2023. This and the November 2, 2023 violation resulted in a monthly average discharge limit violation for cadmium for the month of November 2023, for which an NOV will be issued during the next reporting period.

On December 3, 2023, RBC had another cadmium violation. As a result of RBC personnel changes and SMR submission issues, OC San will issue the NOV during the following reporting period. This violation resulted in a monthly average discharge limit violation for cadmium for the month of December 2023, for which an NOV will be issued during the next reporting period.

On December 5, 2023, OC San held a compliance inspection at RBC. In addition to the corrective action measures presented in the October 17, 2023 letter, RBC secured the above and below grade clarifiers with lock and chain. OC San observed the cadmium process chemicals outside the facility awaiting removal. OC San collected an investigatory sample from water collected in a mop bucket located in the tumbling and deburring room, which contained elevated levels of several constituents, including cadmium. RBC noted at a later date that mop water is sent to the evaporation unit but could not explain why elevated pollutant concentrations were present in this mop bucket.

On December 6, 2023, RBC had a cyanide violation and another cadmium violation, for which an NOV was issued on December 21, 2023. This violation resulted in a monthly average discharge limit violation for cadmium and cyanide for the month of December 2023, for which an NOV will be issued during the next reporting period.

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

#### **Santana Services (Permit No. 1-021016)**

Santana Services (Santana) is a small job shop that welds and brazes aluminum parts for various industries. Wastewater is generated from the preparation and cleaning processes. These processes include a heated caustic tank, a salt rinse tank, a deoxidation tank, two neutralizer tanks, two nitric acid tanks and five rinse tanks. All rinses flow to a small collection tank at the end of the process line, which is then automatically pumped via level control to a batch holding tank, where the pH is adjusted prior to discharge. When process solutions need to be changed out, they are hauled offsite.

In July 2021, Santana had a monthly chromium violation. Santana informed OC San that they were unable to determine the source of chromium as they only process 6061 Aluminum alloy, which had insignificant levels of chromium. However, Santana provided lab reports from 2016 that showed elevated levels of chromium, nickel, copper and zinc from their nitric tank. OC San collected informational samples that confirmed Santana's spent solutions had elevated concentrations of heavy metals, which were being discharged to the sewer without any treatment. OC San issued a compliance requirements letter in November 2021, requiring Santana to immediately cease the practice of discharging spent solution to the sewer and to provide a proposal for the proper waste management of the spent solution. Santana provided a proposal that Santana will wastehaul all spent solutions when the solutions are no longer within specifications and will only discharge the rinses.

July 1 – December 31, 2023

On July 3, 2023, an NOV was issued for the April monthly violations for chromium and nickel. On July 17, 2023, Santana submitted their proposal to cease all industrial wastewater discharge, wastehauling all rinses as well as spent solutions. On July 19, 2023, OC San issued a compliance requirements letter, accepting Santana's proposal to cease discharge of all industrial wastewater and required Santana to submit a zero-discharge certification application by August 31, 2023. On July 17, 2023, Santana had a chromium violation, for which an NOV was issued on August 14, 2023. A root cause analysis and corrective action report was requested to be submitted by August 31, 2023. Santana submitted a close of account form on August 24, 2023, indicating that they had ceased wastewater discharge to the sewer on July 17, 2023.

As a result, Santana's wastewater discharge permit was void after OC San confirmed that the connection to the sewer was capped. No further enforcement is required at this time.

**Scisorek & Son Flavors, Inc. (Permit No. 2-022248)**

Scisorek & Son Flavors, Inc. (S&S Flavors) is a manufacturer of food flavors used in candies, ice cream, popsicles, coffee grinds, juices, and other miscellaneous food applications. Artificial and natural ingredients are mixed and blended in tanks to create concentrated flavor powders and syrups. Process tanks and mixing vessels, ranging from 1 to 1,000-gallon capacity, are utilized for batch production of specialized liquid flavors. Wastewater is generated from cleaning of process tanks, mixing vessels and floors. Equipment and flooring are cleaned with water and sanitizer following each batch run. Wastewater is directed to floor drains located within each production area. S&S Flavors does not have a pretreatment system.

July 1 – December 31, 2023

On December 18, 2023, S&S Flavors had a pH violation, for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and will continue to monitor S&S Flavors' discharge and compliance status on a quarterly basis.

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

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

July 1 – December 31, 2023

On December 8, 14, and 28, 2023, Cherry had cyanide discharge limit violations, for which an NOV will be issued during the next reporting period. These three cyanide results also resulted in a violation of the monthly average discharge limit for cyanide, for which an additional NOV will be issued during the next reporting period.

On November 21, and 22, 2023, OC San inspection staff noted that the temporary covers used as interim stormwater mitigation measures had blown away during a recent storm. On December 19, 2023, OC San issued a compliance requirements letter, detailing the long history of Cherry's stormwater noncompliance issues dating back to June of 2020. In addition, Cherry is required submit a proposal to mitigate the discharge of stormwater to the sewer by January 16, 2024.

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

### **Stainless Micro-Polish, Inc. (Permit No. 1-021672)**

Stainless Micro-Polish, Inc. (SMP) performs metal finishing operations for medical and scientific instrumentation. Wastewater-generating operations include caustic degreasing, acidic surface preparation, permanganate surface iron removal, deoxidation, micro-polishing, and ultrasonic cleaning. SMP operates a continuous pretreatment system that consist of hydroxide precipitation, pH adjustment, coagulation, flocculation, clarification, and solids dewatering.

#### **July 1 – December 31, 2023**

SMP had a monthly chromium violation in September 2023, for which an NOV was issued on December 1, 2023. SMP attributed this exceedance to improper pH set points, which failed to adequately remove chromium from solution. On October 26, 2023, SMP had a chromium violation, for which an NOV was issued on November 9, 2023. SMP submitted a root cause analysis and corrective action report on November 30, 2023, attributing the exceedance to improper pH set points as they continue to target nickel. As a corrective action, SMP had adjusted the pH set points to 9-9.5 to target both nickel and chromium. Additionally, SMP is also evaluating the installation of an automatic solids recycling system to assist with the precipitation of metals. SMP had additional violations in December of 2023, for which NOV's will be issued in the next reporting period.

OC San will continue enforcement during the next reporting period and will continue to monitor SMP'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 treated through zeolite columns and bag filters before discharge to the sewer.

Since 2019, Star has continued to have chronic O&G-min. violations while optimizing the zeolite column treatment system and installing a final holding tank. In 2020, Star continued to have O&G-min. violations. As a result of a dilapidated influent holding tank, Star failed to test each batch prior to discharge. Star installed a new influent holding tank and added a second zeolite column which demonstrated improved O&G-min. removal efficiency. Without prior notification to OC San, Star later replaced the two smaller zeolite columns with two larger 55 gallon vessels that contain zeolite to remove O&G-min. Star indicated that the new vessels would provide additional contact time, over and above what is required to achieve non-detect for O&G-min. Star also indicated that jar testing had indicated good results with increased contact time using zeolite. Star's permit was also revised to include weekly O&G-min. monitoring and required Star to test every treated batch of wastewater for O&G-min. prior to discharge.

In June 2023, Star submitted plans to install a treatment system that would recycle treated wastewater and wastehaul a concentrated O&G-min stream.

#### **July 1 – December 31, 2023**

Star submitted additional information about an ultrafiltration system that uses regenerated cellulose to separates clean water from oil and grease, while preventing contaminants from clogging the filter media. OC San issued a compliance requirements letter on September 12, 2023, accepting the proposed treatment system and requested a close of account form, because Star indicated there would be no additional wastewater discharge to the sewer. After receiving the close of account form, OC San issued a letter confirming that Permit No. 1-600653 was void on August 23, 2023. Therefore, no further action is required at this time and this enforcement case is closed.

### **Statek Corporation (Main) (Permit No. 1-021664)**

Statek Corporation (Main) (Statek) manufactures surface mount and through hole, ultra-miniature quartz crystals and oscillators. Statek's products are utilized in communications, medical electronics, industrial controls, and precision military application devices. The wafer fabrication long and short lines produce wastewater, which is treated using an ammonia pH adjustment system prior to discharge to the sewer.

In September and December of 2021, Statek had pH violations as a result of wastestreams bypassing pH adjustment. After a compliance inspection in April 2022, a compliance meeting was held in June 2022 where Statek discussed re-routing all waste streams to the pH adjustment system and repairing and/or replacing timers that may have contributed to the pH noncompliance. OC San issued a compliance requirements letter requiring Statek to submit updated drawings and verify pH treatment system capacity to maintain long terming compliance with pH limits. On June 1, 2023, Statek submitted information in response to the compliance requirements letter.

#### **July 1 – December 31, 2023**

Following the June 1, 2023, submittal, OC San requested clarifying information from Statek, which was received on August 11, 2023, and October 24, 2023. Statek provided updated drawings, verified the retention time of the pH treatment system, determined procedures to cease discharge of noncompliant wastewater during pH alarms, and removed a solution of dilution water. On December 19, 2023, OC San issued a compliance requirements letter, accepting Statek's response and corrective actions.

Statek had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed.

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

### **Summit Interconnect, Inc. (Permit No. 1-600012)**

Summit Interconnect, Inc. (Summit) is a large, full-service printed circuit board manufacturer. Wastewater is generated from spent solutions and rinses from the processing of copper laminates into printed circuit boards. Wet processes include alkaline cleaning, acid cleaning, cupric chloride and ammonia etching, resist stripping, oxide treatment, electroless copper plating, copper/lead plating, solder mask, developing, tin stripping, screen cleaning, deburring, pumice scrub, and miscellaneous cleanup/mop water. Summit operates a continuous pretreatment system utilizing separate carbon vessels and ion exchange systems to treat unchelated copper wastestreams and chelated copper wastestreams. Treated unchelated wastestream is further treated by another ion exchange system to produce deionized water that is re-used for their production. Treated chelated copper rinses and unrecycled treated unchelated copper rinses are discharged to the final discharge tank, where pH adjustment occurs prior to discharge. Regeneration waste for the chelated and unchelated copper wastestreams is treated through electrowinning, while regeneration waste for the deionized water production is discharged to the final discharge tank for pH adjustment. Batch treatment is performed if the continuous system does not have the capacity. Batch treatment consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press is also used. Decant from batch treatment is discharged to the final discharge tank.

In July and August 2021, Summit had copper mass violations. In September 2021, OC San conducted a compliance inspection to investigate the causes of these violations. Summit attributed the source of the mass violations to a portion of the flow from the unchelated copper waste stream that bypassed the ion exchange system and was directly discharging to the final discharge tank due to a partially plugged carbon vessel. Summit had another copper violation in October 2021. In January 2022, OC San issued an NOV for the October 2021 copper monthly limit violation. OC San issued a compliance requirements letter in January 2022 requiring Summit to attend a compliance meeting. A compliance meeting was held in January 2022, where Summit attributed the copper violations to a plugged carbon vessel on the unchelated system, an undersized motor and pump, and solenoid valves being stuck open for several production processes. Summit has since replaced the carbon vessel, replaced the pump and motor, and replaced the solenoid valves. OC San issued a compliance requirements letter in March 2022 to require

Summit to conduct multiday self-monitoring, provide updated pretreatment system drawings and an updated operation and maintenance (O&M) manual. Multi-day self-monitoring demonstrated continuous compliance, and Summit submitted the updated pretreatment system drawings in April 2022. After inadequate submittals of a revised O&M manual, OC San required Summit to submit a revised O&M manual by July 15, 2022.

#### July 1 – December 31, 2023

On July 18, 2023, OC San issued the NOV for the instantaneous copper violation on June 21, 2023. On August 4, 2023, Summit submitted a root cause analysis and attributed the violation to a failure in their air operated valve that allowed the discharge from an untreated batch treatment tank. As a corrective action, Summit repaired the valve and will start monitoring the valve during discharge. OC San conducted a compliance inspection on August 10, 2023, to review the root cause of the violation and the corrective actions implemented. During the inspection, Summit was still unable to determine the cause of the violation as the wastestreams that were discharging during the time of the violation were from non-metal bearing sources. Summit verified that they did not process any batches or conducted any ion exchange column regeneration during the time period when the violation occurred. Summit continues to investigate to determine the sources of the wastestreams in the collection tanks. Summit will also implement an interlock where discharge valves will not open if the pH in the final batch discharge tank is noncompliant with discharge limits.

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

#### **Summit Interconnect, Inc., Orange Division (Permit No. 1-600060)**

Summit Interconnect, Inc., Orange Division (Summit - Orange) is a large, full-service printed circuit board manufacturer. Wastewater is generated from spent solutions and rinses from the processing of copper laminates into printed circuit boards. Wet processes include alkaline cleaning, acid cleaning, cupric chloride and ammonia etching, resist stripping, oxide treatment, electroless copper plating, copper/lead plating, solder mask, developing, tin stripping, screen cleaning, desmearing, pumice scrub and miscellaneous cleanup/mop water.

Wastewater treatment at Summit - Orange consists of a Kinetico IX Water Recycle System (Kinetico IX WRS) for non-chelated copper rinsewater, and batch treatment for spent process chemicals, dragout rinse tanks, and ion exchange regenerant. DI water is produced from the Kinetico IX WRS system and used in multiple rinses, where it is then returned to the Kinetico system for recycling. The columns are regenerated using sulfuric acid. Effluent from the batch treatment system and the Kinetico IX WRS system is adjusted for pH. Wastewater then flows to a three-stage clarifier with a sample box and then to the sewer.

#### July 1 – December 31, 2023

On November 21, 2023, Summit – Orange had sulfide and dissolved sulfide violations, for which an NOV– was issued on December 21, 2023.

OC San will continue enforcement during the next reporting period and will continue to monitor Summit-Orange's discharge and compliance status on a quarterly basis.

#### **Tawa Services, Inc. (Food and Meat Processing Center) (Permit No. 1-601896)**

Tawa Services, Inc (Food and Meat Processing Center) (Tawa FPMC) produces a variety of food items consisting of steamed dumplings, steamed buns, vegetables, and single serve meals. Meat products produced include beef, pork, lamb, chicken and duck, as well as seafoods including shrimp and squid. Bulk raw materials (meats as previously indicated, flour, rice, vegetables, eggs, nuts, various sauces, spices, and oils) arrive onsite and are stored in various locations based on production and FDA requirements. Raw meats needing preparation are cut, sliced, or trimmed according to the specific use and recipe. Meats are marinated as needed. Ingredients are mixed and weighed according to recipes. All food items are either steamed, baked, fried, or sautéed to the recipe specifications. After completion,

all food items are placed in appropriate packaging. The items can be cooled or frozen prior to shipment to Tawa branded supermarkets. Wastewater is generated from the cleaning/washing/rinsing/sanitization of the mixers, process equipment, and floor wastes. Wastewater flows to a large underground clarifier along the south side of the facility.

On January 12, 2022, OC San conducted an Industrial Waste Survey, in which it was determined Tawa FPMC warranted a Class 1 Wastewater Discharge Permit. In December 2022, OC San issued an NOV to TAWA for discharging wastewater to the sewer without a wastewater discharge permit. TAWA was issued a Class I wastewater discharge permit in April 2023.

#### July 1 – December 31, 2023

On September 30, 2023, Tawa FMPC had a pH violation, for which an NOV was issued on October 20, 2023.

OC San will continue enforcement during the next reporting period and will continue to monitor Tawa FPMC's discharge and compliance status on a quarterly basis.

#### **Thermal-Vac Technology, Inc. (Permit No. 1-021282)**

Thermal-Vac Technology, Inc. (Thermal-Vac) is a job shop that assembles products ranging from heat exchangers, flow fittings, and chassis to wave guides and surgical devices. Thermal-Vac receives machined stainless steel, nickel, and aluminum parts and is contracted primarily for their heat treatment, brazing and assembly work. Stainless steel products undergo heat treatment, acetone or ultrasonic cleaning, and final assembly, oiling, and packaging. Aluminum products are cleaned, etched, surface deoxidized, descaled, bright dipped, followed by part pre-heating/water removal, and fluoride salt bath brazing. The nickel products process will vary based on the final product, but the products may be cleaned, etched, stripped, bright dipped, and deoxidized. The parts are then assembled, oiled, and packaged to be delivered to the customer. Thermal-Vac had a copper-plating line previously, but the equipment has been removed.

After nickel violations in August 2022, OC San conducted a compliance inspection at Thermal-Vac in September 2022, which revealed inconsistencies between operations and facility drawings and information previously provided by Thermal-Vac, particularly regarding the nickel operations. OC San issued a compliance requirements letter on December, 2022, requiring Thermal-Vac to attend a compliance meeting.

During the compliance meeting in January, 2023, it was determined that further clarity on the processes, flows, and treatment was needed. OC San issued a compliance requirements letter in March, 2023, requiring Thermal-Vac to provide updated, detailed drawings, an updated tank schedule, a water balance diagram, and a wastewater characterization. Although updated drawings, a tank schedule, and a water balance were submitted to OC San, Thermal-Vac failed to provide a wastewater characterization.

#### July 1 – December 31, 2023

On October 3, 2023, OC San issued an NOV for the August 2022 monthly nickel violation. Thermal-Vac also submitted additional facility drawings and a wastewater characterization in October 2023, and is currently under review by OC San.

OC San will continue enforcement actions in the next reporting period and will continue to monitor Thermal-Vac's discharge and compliance status on a quarterly basis.

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

TTM Technologies North America, LLC (TTM Technologies) is a large scale, full-service printed circuit board shop. Wastewater is generated from the processing of copper laminates into printed circuit boards. Wet processes include copper plating, electroless copper plating, nickel/gold plating, solder mask, alkaline cleaning, acid cleaning, scrubbing, developing, resist stripping, tin stripping, etching, screen cleaning, oxide coating, and miscellaneous cleanup/mop water. Rinse schemes practiced at the facility include significant use of static rinses in addition to running rinses. TTM Technologies operates a

continuous pretreatment system to treat low concentration wastestreams, consisting of pH adjustment and multiple ion exchange resin beds, with a large portion of the effluent reused onsite. Batch treatment is performed on spent solutions and ion exchange backflush and consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press. Concentrated wastestreams (etchant, spent plating solutions) are wastehauled offsite.

In November 2021, TTM Technologies had a copper violation. TTM Technologies attributed the violation to particulates discharged while decanting the batch treatment tanks when the operator was changing out the bag filters. The operator failed to allow the batch tank contents to settle to complete the batch treatment. Furthermore, the recirculation lines between the filter press filtrate and the batch tank were damaged. TTM Technologies has since retrained its operators, fixed the damaged lines, and improved inspection logs by requiring management sign off. OC San conducted a compliance inspection in December 2021 to review the implemented corrective actions. In June 2022, TTM Technologies had another copper violation. TTM Technologies attributed the violation to solids carryover, because the operator decanted right above the sludge level in the batch tank. TTM Technologies' corrective action was to redirect the decant to the filter press for recirculation and additional solids removal prior to final discharge. TTM Technologies is also planning on installing filters prior to the final discharge tank to catch additional solids.

#### July 1 – December 31, 2023

On September 22, 2023, TTM had a copper violation, for which an NOV was issued on October 4, 2023. A root cause analysis and corrective action report was provided on October 17, 2023. TTM attributed the violation to the collection of static wastewater in the sample box as production had ceased and wastewater was generated by site cleaning and treatment of residual rinses. As a corrective measure, TTM modified procedures to only treat wastewater with batch treatment, verifying compliance with an in-house AA machine prior to discharge. On December 1, 2023, an NOV was issued for the September monthly violation for copper.

TTM had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed.

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

#### **Universal Molding Co. (Permit No. 1-521836)**

Universal Molding Co. (Universal) powdercoats aluminum assemblies used for various architectural applications. The facility receives pre-fabricated aluminum pieces that undergo surface prep and chem-film prior to powdercoating and final packaging.

Wastewater is generated from rinses from the powdercoating surface prep / chem-film process. Wastewater treatment consist of hexavalent chromium reduction with sodium metabisulfite, followed by hydroxide precipitation, coagulation and flocculation. Solids are sent to a filter press, where filtrate is recycled back to the batch tank. Effluent from the batch tank is decanted to a holding tank. Once the holding tank is full, the tank discharges to the pH adjustment tank for final pH adjust before discharge to the clarifier and to the sewer.

#### July 1 – December 31 2023

On August 22, 2023, Universal Molding had a chromium violation, for which an NOV was issued on September 11, 2023. On October 11, 2023, Universal Molding submitted their root cause analysis and corrective action report. Universal Molding attributed the violation to the following: a bypass pipe that exists between the batch treatment tanks and the pH adjustment tank, contamination of the clarifier and potential solid build-up, drag-out from the chromium tank into the non-chromium rinse tanks, and potential operator errors. Universal Molding has taken the following corrective measures: elimination of the bypass piping, cleaning the clarifier and has scheduled annual pump-out of the clarifier, removal of spraying of racks after chromium phosphate tank to reduce any spill over into non-chromium rinse tanks, and

retraining of their operators. On November 1, 2023, an NOV was issued for the August monthly chromium violation.

Universal Molding had no further violations during the reporting period. Therefore, no further action is required at this time and this enforcement case is closed.

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

### **3.0 Santa Ana Watershed Project Authority (SAWPA)**

SAWPA was formed in 1968 to develop a long-range plan for managing, preserving and protecting the quality of water supplies in the Santa Ana Basin. SAWPA is a Joint Powers Authority (JPA) consisting of five member agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western Water). 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 designated to carry saline wastewater from the Upper Basin to OC San for disposal, after treatment, into the Pacific Ocean. This wastewater consists of a mixture of desalter brine and saline wastewater from Industrial Users (IUs), but also some temporary domestic discharges. The wastewater is treated by OC San to comply with environmental standards before discharge to the ocean outfall. The capacity of the Brine Line available to SAWPA is 30 million gallons per day (MGD). The average daily discharge was 12.66 MGD for this reporting period.

#### **3.1 Brine Line System Pretreatment Program Overview**

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

SAWPA owns and operates the Brine Line above the Orange County line and has purchased 17 MGD of treatment and disposal capacity rights at OC San's treatment facilities. As of December 31, 2023, there are thirty-two (32) direct connections Permittees and eighteen (18) indirect discharge Permittees. The indirect discharge Permittees are located within the SAWPA service area and 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, SBMWD on behalf of Valley District, and the City of Corona on behalf of Western Water.

SAWPA has the permitting responsibilities for all Liquid Waste Haulers (LWH) that use the Collection Stations. As of December 31, 2023, there are eight (8) LWH permitted by SAWPA to use the Collection Stations. The SAWPA LWH permits assign a primary collection station and alternate collection station should the primary collection station become unavailable due to repairs or closure.

During the reporting period (July 1, 2023, through December 31, 2023), SAWPA continued implementation of numerous program documents and worked to improve the operation and implementation of the Pretreatment Program. The 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. OC San has completed the process of updating and revising its Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OC San, SAWPA is required to update its Ordinance to include relevant OC San revisions. SAWPA has developed draft Ordinance No. 9 which has been revised to incorporate the updates within the new OC San Ordinance. SAWPA submitted the draft Ordinance to OC San for their review and concurrence on June 11, 2020. After further discussion with OC San SAWPA has additionally drafted new Emergency and Emergency Discharge definitions for Ordinance No. 9 and shared those with OC San in the Joint Policy Committee Meeting on August 19, 2021. It is anticipated SAWPA will receive comments from OC San regarding the draft Ordinance in 2024.

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**

#### **Description of Beaumont**

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

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

#### **Enforcement Action**

There was no enforcement action during this reporting period.

### **3.2.2 Eastern Municipal Water District**

#### **Description of EMWD**

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

#### **Enforcement Action**

There was no enforcement action during this reporting period.

### **3.2.3 Inland Empire Utilities Agency**

#### **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 4, 4A and 4D. IEUA, originally named the Chino Basin Municipal Water District, 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 935,000 people. The Agency's service area includes the Cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, as well as the Cucamonga Valley Water District and the Monte Vista Water District.

## **Enforcement Action**

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

On July 18, 2023, a Notice of Violation and Order for Corrective Action was issued, for a pollutant discharge violation. On May 5, 2023, the permittee collected a wastewater sample from Monitoring Point 001. The laboratory analysis results received on June 7, 2023, indicated a pH value of 5.8 S.U., which exceeded the local instantaneous lower limit of 6.0 S.U. as stated in Permit No. D1032-3. Additionally, the permittee failed to notify the Control Authorities within twenty-four hours of becoming aware of the violation as required by Permit No. D1032-3. The NOV/OCA required the permittee to submit a written response, on or before July 25, 2023, with results of its investigation as to the cause of the pH lower limit and failure to notify the control authority within twenty-four hours of becoming aware of the violation and corrective action designed to bring the facility into consistent compliance. The permittee is also required to continue to conduct monthly pH monitoring and report results to IEUA by the 7th of each month following the monitoring period sampling was conducted. The permittee responded on July 25, 2023, stating it reviewed its food, drinks and cleaning products and verified its grease interceptor is being pumped monthly. Additionally, the permittee stated it could not find a cause of the low pH and it will review laboratory analysis results closely moving forward and notify IEUA within twenty-four (24) hours of becoming aware of any violations. The permittee submitted their July monthly monitoring results, and the pH value was in compliance with Permit No. D1032-3. Enforcement closed on July 25, 2023. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Green River Golf Club to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **In-N-Out Burger, Chino Distribution Center (Permit No. D1134-1)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on August 2, 2023, following permitted flow rate and BMP violations. On July 14, 2023 the permittee notified IEUA that it had exceeded its permitted flow rate limit of 60 gpm on July 12 and July 13, 2023. The average instantaneous flow rate on these days was calculated to be 65 gpm and 69 gpm, respectively. Additionally, on July 18 2023, IEUA inspectors noted standing wastewater on the floor in the pretreatment building, excessive amounts of solids/sludge and wastewater level above the channel in the manhole structure located outside of the pretreatment building and that the effluent flow reading displayed 60.5 gpm, which are violations of permitted BMP requirements as well as the instantaneous flow rate of 60 gpm. Furthermore, on August 3, 2023, the permittee notified IEUA that it had again exceeded its gpm flow rate limit of 60 gpm on July 17, 2023. The average instantaneous flow rate was calculated to be 61.9 gpm. The NOV/OCA required the permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of flow rate and BMP violations by no later than August 10, 2023. Furthermore, the permittee was required to submit a compliance schedule that required acceptance by the Control Authorities by no later than August 31, 2023. The permittee responded on August 8, 2023, stating that during testing of its CIP systems, excess water was discharged simultaneously which caused flow exceedances. The permittee confirmed that under normal operations this cannot occur and was a byproduct of the testing of the system. On August 31, 2023 the permittee submitted a compliance schedule along with an updated response. The permittee reported that it would need additional capacity and arranged to purchase two additional capacity units. Additionally, the permittee stated it had installed a flex coupling on the brine tank discharge pipe to prevent spillage onto the treatment building floor and that the manhole cover located just upstream of the flow meter is now locked down to prevent spillage. This was confirmed during a site inspection on August 31, 2023. The permittee also stated that it has

optimized the DAF efficiency to better remove solid material from its wastewater. Furthermore, the permittee is measuring and recording final discharge tank level each hour which will enable them to use PSI reading to monitor flow leaving the tank. The permittee stated it is receiving alerts via its Building Management System of any wastewater issues within its warehouse and has adjusted its discharge set point alarm, so it alarms at 5 gpm under the current limit. On September 20, 2023, the purchase of additional capacity by the permittee was approved by the IEUA Board of Directors which increased their daily discharge rate to 90 GPM or 129,690 gpd. Purchase of the additional capacity ensured compliance with the permit limits as required. Enforcement closed on September 21, 2023. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at In-N-Out Burger, Chino Distribution Center to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **3.2.4 Jurupa Community Services District**

#### **Description of JCSD**

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

#### **Enforcement Action**

There was no enforcement action during this reporting period.

### **3.2.5 San Bernardino Municipal Water Department**

#### **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 Valley District, is responsible for administering the pretreatment program associated with the SBMWD Brine Line Collection Station.

#### **Enforcement Action**

#### **Inland Water Services (Permit No. I1066-4.1)**

On June 15, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Inland Water Services for a pollutant discharge violation. On May 9, 2023, SBMWD collected a wastewater sample from Monitoring Point 001. The laboratory analysis results received on May 26, 2023, indicated a Copper concentration of 4.8 mg/L, which exceeded the Daily Maximum Discharge Limitation of 3.0 mg/L as stated in Permit No. I1066-4. The NOV/OCA required the permittee to submit a written report detailing the cause of the violation and corrective action taken to prevent recurrence of the violation by no later than June 28, 2023. Permittee responded on June 29, 2023, and attributed the cause of the violation to a missed Copper removal exchange tank change out. The permittee exchanged the Copper removal tanks on June 19, 2023, in response to the NOV/OCA. The permittee stated as a corrective action the exchange tank change out frequency will be revised to coincide with quarterly sampling during the first week of each quarter. The permittee collected a Copper sample before the exchange tank change out on June 19, 2023, indicating a Copper concentration of 0.146 mg/L. The permittee also collected a Copper sample after the exchange tank change out on June 19, 2023, indicating a Copper concentration of 0.0895 mg/L. The permittee stated that both Copper sample results show compliance with the Daily

Maximum Discharge Limitation of 3.0 mg/L as stated in Permit I1066-4.1. On July 24, 2023, SBMWD collected a resample from Monitoring Point 001. The resample indicated a Copper concentration of 0.23 mg/L. All follow-up samples indicated compliance. Enforcement closed on August 9, 2023. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Inland Water Services to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **3.2.6 San Bernardino Valley Municipal Water District**

#### **Description of Valley District**

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

#### **Enforcement Action**

##### **Rialto Bioenergy Facility, LLC (Permit No. D1130-2)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on July 13, 2023, for pollutant discharge violations. On June 22, 2023, and June 24, 2023, the Permittee's contract laboratory collected wastewater samples from Monitoring Point 001. Laboratory results received on July 31, 2023, indicated TSS concentrations of 150 mg/L and 160 mg/L, both which exceeded the maximum daily discharge limit of 100 mg/L as stated in Permit No. 1130-2. The NOV/OCA required the Permittee to respond with a corrective action plan within 10 days of the notification. However, during this time the Permittee had further self-monitoring violations and SAWPA escalated the enforcement and scheduled a compliance meeting on August 31, 2023, to resolve the chronic non-compliance. Valley District shall continue to conduct unannounced inspections and wastewater monitoring at Rialto Bioenergy Facility, LLC to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **3.2.7 Santa Ana Watershed Project Authority (SAWPA)**

#### **Description of SAWPA**

SAWPA is a JPA, 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: EMWD, IEUA, OCWD, Valley District, and Western Water. SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to direct and indirect dischargers jointly with member and contract agencies and solely issues permits to all member and contract agency owned or affiliated direct and indirect dischargers.

#### **Enforcement Action**

##### **Rialto Bioenergy Facility, LLC (Permit No. D1130-2)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) and Violation Meeting was issued by SAWPA on August 8, 2023, for pollutant discharge violations. In addition to the violations described in the July 13, 2023, NOV/OCA issued by Valley to the Permittee, it was determined on July 7, 2023, that Rialto Bioenergy failed to conduct the required quarterly self-monitoring event during the April 1, 2023, to June 30, 2023, sampling period as identified in Permit No. D1130-2. Furthermore, the permittee collected self-monitoring samples from Monitoring Point 001 on June 9, 2023, and on June 10, 2023. The results

of analysis from these samples were reported on August 1, 2023, a violation of the required submittal date of July 7, 2023, as stated in Permit No. D1130-2. The NOV/OCA required the Permittee to schedule a Violation Meeting with the Control Authorities by August 18, 2023. Additionally, the permittee was required to immediately collect the required quarterly sample and report the results of analysis to SAWPA by no later than August 22, 2023. Furthermore, the permittee was required to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than August 18, 2023. SAWPA received the required written report on August 15, 2023, and the corrective action outlined was to reroute Cooling Tower washdown into pretreatment, hire a third-party consultant to manage self-monitoring events and extension requests, and decrease coagulant dose rates to reduce system impact. SAWPA received the required quarterly sample and report on August 22, 2023. The Violation Meeting took place on August 31, 2023. During the Violation Meeting SAWPA outlined and discussed violations listed in the NOV/OCA and answered questions the Permittee had regarding Permit No. D1130-2. The Permittee outlined their corrective action as previously described in their corrective action report. The corrective actions were determined to be completed as required during the Valley inspection on August 21, 2023. The enforcement was closed on August 31, 2023. SAWPA and Valley District shall continue to conduct unannounced inspections and wastewater monitoring at Rialto Bioenergy Facility, LLC 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**

#### **K-Vac Environmental Services, Inc. (Permit No. H1049-4.1)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on September 28, 2023, following a rejected load attempted to be discharged to the Western Collection Station (collection station). On September 5, 2023, at 11:02 am a pH alarm was triggered at the collection station. A City of Corona Operator responded to the alarm by collecting a wastewater sample from the Liquid Waste Hauler truck discharging to the collection station and conducted a field analysis of the sample using a hand-held pH meter. The analysis indicated a pH result of 12.07 S.U., which exceeded the local instantaneous upper limit of 12.0 S.U. as stated in Permit No. H1049-4.1. Additionally, it was determined that three incomplete Liquid Waste Manifest Forms were submitted in August and September 2023 by the Hauler. The NOV/OCA required K-Vac Environmental Services, Inc. to submit a written report to SAWPA detailing the cause and corrective actions taken to prevent a recurrence of the violations by no later than October 5, 2023. On October 5, 2023, SAWPA received the required written report detailing the cause and corrective action taken to prevent a recurrence of violations. The permittee has retrained all drivers on manifest and hauling requirements and added additional review measures on manifests going forward. Enforcement closed on October 5, 2023. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at K-VAC Environmental Services, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **3.2.9 Western Municipal Water District**

#### **Description of Western Water**

Western Water is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries connected to the Brine Line within its service area. Western Water 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 Water's service area covers 527 square miles, serving a population of approximately 900,000 people. The District serves 10 wholesale customers with imported water via the Colorado River and the State Water Project. Western also supplies imported water and groundwater directly to approximately 25,000 residential, commercial and agricultural customers in the areas of El

Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Orangecrest, Mission Grove, Lake Mathews, March Air Reserve Base, Rainbow Canyon and portions of the cities of Riverside and Murrieta. The Murrieta division provides water and wastewater services in a 6.5-square mile portion of Murrieta and relies on both groundwater and imported sources. Western headquarters is located in Riverside, California and serves the western Riverside County portion of the watershed, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

### **Enforcement Action**

#### **Saratoga Foods, Inc. (Permit No. I1128-2)**

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on September 28, 2023, for a pH violation detected at the Western Water Collection Station, discharge of an unpermitted wastestream from their spill containment, and failure to properly fill out the waste haul waste manifest. On September 5, 2023, at 11:02 am a pH alarm was triggered at the collection station from a load hauled from the Permittee. A City of Corona Operator responded to the alarm by collecting a wastewater sample from the K-VAC Environmental Services, Inc. truck discharging to the collection station and conducted a field analysis of the sample using a hand-held pH meter. The analysis indicated a pH result of 12.07 S.U. Furthermore, the permittee failed to complete Section A of Brine Line Manifest #169138 as required in Permit No. I1128-2. The NOV/OCA required Saratoga Foods to investigate the causes of the violations and to submit an investigative report and a Corrective Action Plan no later than October 15, 2023. The Permittee submitted the required reports on October 13, 2023. The Permittee retrained all staff responsible for completing manifests and proper wastewater tank pump out procedures. Additionally, the Permittee worked with K-VAC Environmental Services, Inc. to refine procedures for loading the Liquid Wastehauler Truck for discharge. Review indicated the Permittee met the requirements set forth by the NOV/OCA and have returned to compliance. Enforcement closed on October 16, 2023. Western Water shall continue to conduct unannounced inspections and wastewater monitoring at Saratoga Foods, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

### **3.2.10 Yucaipa Valley Water District**

#### **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 SAWPA. The brine disposal facility is critical to ensure the YVWD meets the 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, US 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, 2023, of the active fifty-six (56) permittees, there were zero (0) 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) violations 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, oils 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 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, 2023**  
 Santa Ana Watershed Project Authority  
 Orange County Sanitation District, Resource Protection Division

<i>EMWD, IEUA, JCSD, SBMWD, Valley District, SAWPA, and Western Permittees</i>		
<b>Company Name</b>	<b>Permit No.</b>	<b>Reporting or Discharge Violation</b>
None	N/A	N/A

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

**Rohr, Inc. (Rohr)** a part of Collins Aerospace, operates the Groundwater Pump & Treat (P&T) system under the oversight of the Santa Ana Regional Water Quality Control Board (SARWQCB). Activities include groundwater pump and treat and discharge of treated groundwater to the City of Riverside publicly owned treatment works (POTW) via an industrial user permit. The objective of the groundwater P&T system is to hydraulically control and minimize the potential of the Site groundwater plumes from entering surface water or migrating off-site. In 2019 the City of Riverside lowered the local limit for TDS from 2,500 mg/L to 1,210 mg/L. To meet the new local limit, Rohr is proposing to divert approximately 50% of fully treated water from the system's effluent trunk line and process through reverse osmosis (R.O.) units. R.O. concentrate brine waste is the only source of wastewater that will be hauled to the Brine Line Collection Station at a volume of approximately 5,000 gallons per week. The facility is expected to begin discharge to the Brine Line in the second quarter of Fiscal Year 2023/2024.

**Western Riverside County Regional Wastewater Authority (WRCRWA) South Regional Pump Station (SRPS)** located at 671 N. Lincoln Avenue, Corona, CA 92880 pumps approximately 3.0 MGD of predominately domestic sewage with some light commercial dischargers to WRCRWA's Treatment Plant located at 14634 River Road, Corona, CA 92880. This facility was previously allowed to discharge during unplanned events to the Brine Line, however in October of 2020 WRCRWA was notified that additional redundancies must be added to the system to ensure hydraulic control is maintained to prevent unauthorized discharge to the Brine Line. WRCRWA responded on February 2, 2021, providing a conceptual plan for installation of a standalone back-up pump to minimize and/or eliminate the potential for discharges of wastewater into the Brine Line from SRPS during an emergency, or other, event. On March 13, 2023, SAWPA issued a letter to WRCRWA documenting that SAWPA and OC San have reviewed the conceptual plan submitted by WRCRWA and that SAWPA accepts the conceptual plan as submitted. An RFP for preparation of design and construction documents (plans and specifications) was prepared by WRCRWA and issued on May 9, 2023. Proposals were received on June 5, 2023. A recommendation to approve an engineering services contract was presented to the WRCRWA Executive Committee on September 14, 2023, and was approved at the WRCRWA Board meeting on September 28, 2023. The contract was awarded to Lee + Ro Water Infrastructure Engineers. A kick-off meeting for the project was held on October 18, 2023, with the consultant and engineering staff following up with a visit to the project site on October 30, 2023. The contract staff are currently evaluating configurations for the bypass pump project along with other alternatives and upgrades to the original design. The engineers will present a final design in the near future for staff consideration. It is anticipated that construction will be completed, and the final plan implemented for the SRPS in 2025.

### 3.5 SAWPA Special Projects

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

1. Air/Vac Structure Maintenance – 10 structures cleaned, inspected, and overhauled on Reach V.
2. Air/Vac Structure Maintenance – 8 locations were cleaned and weeded on Reach V.
3. Air/Vac Structure Maintenance - 2 cans were cleaned and painted on Reach V.
4. Air/Vac Structure Maintenance – 1 isolation valve can was replaced on Reach V.
5. Air/Vac Structure Maintenance - 5 structures cleaned, inspected, and overhauled on Reach IV-B Lower.
6. Air/Vac Structure Maintenance – 1 structure cleaned, inspected, and overhauled on Reach IV-E.
7. 1,627 USA tickets were received – 200 were marked in field.
8. Traffic control and permitting for reach 4D line inspection and cleaning.

Special projects summarized in Table 3.2.

**Table 3.2 Summary of SAWPA Special Projects, July 1 – December 31, 2023**  
 Santa Ana Watershed Project Authority  
 Orange County Sanitation District, Resource Protection Division

Activity	Reach IV	Reach IV-A Lower	Reach IV-A Upper	Reach IV-B Lower	Reach IV-B Upper	Reach IV-D	Reach IV-E	Reach V	Corona Lateral
ROW Maintenance	2.69 Miles	2.25 Miles	2,304 Feet	3,662 Feet					831 Feet
Line Inspection			2,700 Feet						
Line Cleaning			5,600 Feet	2,700 Feet					
MAS Inspection	7	23	14	8	2	10	6	10	6
MAS R&R									
Pot Holing					2	10	3	6	
Frame and Cover R&R									

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

A flow meter installed at SMS located at the Orange County line measures SAWPA's discharge. For the total billing days during the six-month period from July 1, 2023, through December 31, 2023, a total of 2,341.70 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, hardness, and other constituents/pollutants.

Table 3.3 and Table 3.4 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 lb/d are flow-weighted values.

**Table 3.3. SAWPA Daily Average Concentration (mg/L) and Mass (lb/d) Measured from Weekly Sampling at OC San's SARI Metering Station, July – September 2023**  
 Santa Ana Watershed Project Authority  
 Orange County Sanitation District, Resource Protection Division

Average Daily Flow in MGD	July 2023		August 2023		September 2023		Quarterly Average	
	13.3084		13.0881		13.0105		13.1357	
Pollutant	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d
Arsenic	0.0035	0.3829	0.0037	0.4039	0.0044	0.4774	0.0039	0.4218
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	ND	****	0.100	1.0916	ND	****	0.0033	0.3652
Copper	ND	****	0.0065	0.7095	ND	****	0.0068	0.7209
Lead	ND	****	ND	****	ND	****	ND	****
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	ND	****	ND	****	ND	****	ND	****
Silver	ND	****	ND	****	ND	****	ND	****
Zinc	0.0100	1.1099	0.0155	1.6919	0.0130	1.4106	0.0128	1.4059
<b>Total Metals</b>	<b>0.0135</b>	<b>1.4928</b>	<b>0.0357</b>	<b>3.8968</b>	<b>0.0174</b>	<b>1.8880</b>	<b>0.0222</b>	<b>2.4302</b>
BOD	27.2308	3,022.4062	11.0563	1,206.8464	15.1077	1,639.2946	17.3167	1,897.0681
TSS	66.6154	7,393.7959	71.3750	7,790.9474	67.6154	7,336.7617	68.7381	7,530.3667

ND = Not detected

\*\*\*\* = lb/d not calculated due to concentration less than detection limits (typical).

**Table 3.4. SAWPA Daily Average Concentration (mg/L) and Mass (lb/d) Measured from Weekly Sampling at OC San's SARI Metering Station, October – December 2023**  
 Santa Ana Watershed Project Authority  
 Orange County Sanitation District, Resource Protection Division

Average Daily Flow in MGD	October 2023		November 2023		December 2023		Quarterly Average	
	12.9433		11.9579		12.4950		12.4654	
Pollutant	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d
Arsenic	0.0032	0.3454	0.0037	0.3640	0.0034	0.3491	0.0034	0.3535
Cadmium	ND	****	ND	****	ND	****	ND	****
Chromium	0.0115	1.2414	0.0250	2.4932	ND	****	0.0122	1.2649
Copper	0.0145	1.5652	0.0190	1.8949	ND	****	0.0112	1.1609
Lead	ND	****	ND	****	ND	****	ND	****
Mercury	ND	****	ND	****	ND	****	ND	****
Nickel	ND	****	ND	****	ND	****	ND	****
Silver	ND	****	ND	****	ND	****	ND	****
Zinc	0.0925	9.9851	0.0755	7.5295	0.0130	1.3547	0.0603	6.2723
<b>Total Metals</b>	0.1217	13.1410	0.1232	12.2816	0.0164	1.7038	0.0871	9.0534
BOD	18.4615	1,992.8641	28.1875	2,811.1119	17.9000	1,865.3227	22.3077	2,319.1360
TSS	141.9231	15,320.1428	166.6250	16,617.3488	67.8000	7,065.3005	133.0513	13,832.1799

ND = Not detected

\*\*\*\* = lb/d not calculated due to concentration less than detection limits (typical).

# Appendix 1. Monitoring and Compliance Status Report

---

1st and 2nd Quarters  
FY 2023/2024

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
3M ESPE Dental Products	Z-371301	2111 Mcgaw Ave, Irvine, CA 92614	339114	433.17(a), 467.16, 471.65(n), 471.65(q)	0	0	0			
A & G Electropolish	1-531422	18330 Ward St, Fountain Valley, CA 92708	332813	433.17(a)	2	10	4			
A & K Deburring and Tumbling, Inc.	1-511362	2008 S. Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	2	11	2			
A & R Powder Coating, Inc.	1-021088	1198 N. Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	2	8	0			Class 1 Permit Deactivated
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	2	26	10			
Accurate Circuit Engineering	1-011138	3019 S. Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	2	15	4			
Active Plating, Inc.	1-011115	1411 E. Pomona St, Santa Ana, CA 92705	332813	433.17(a)	2	15	30			
ADS Gold, Inc.	Z-321851	3843 E. Eagle Dr, Anaheim, CA 92807	331410	433.17(a)	1	0	0			
Advance-Tech Plating, Inc.	1-021389	1061 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	5	23	29	Zinc		
Advanced Thermal Sciences Corporation	Z-600654	3355 E. La Palma Ave, Anaheim, CA 92806	336413	433.17(a)	0	0	0			
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave, Garden Grove, CA 92841	332722	403.5(d)	2	7	4			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St, Garden Grove, CA 92841	332722	433.17(a), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(h), 471.35(i), 471.35(k), 471.35(l), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(y), 471.35(z), 471.65(f), 471.65(g), 471.65(h), 471.65(j), 471.65(l), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(u), 471.65(w), 471.65(x)	2	21	35	Cadmium, Cyanide		
All Metals Processing of Orange County, LLC	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	2	24	10			
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	2	23	9			
Allied Electronics Services, Inc.	1-011073	1342 E. Borchard, Santa Ana, CA 92705	334412	433.17(a)	2	13	4			
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325611	417.166, 417.176, 417.66, 417.86	2	12	3	Zinc		

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	6550 Caballero Blvd, Buena Park, CA 90620	331523	464.16(a), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	2	13	15	Zinc		
Alloy Tech Electropolishing, Inc.	1-011036	2220 S. Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	2	7	4			
Alsco, Inc.	1-021656	1755 S. Anaheim Blvd, Anaheim, CA 92802	812331	403.5(d)	2	13	9	O&G-min.		
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E. Alton Ave, Santa Ana, CA 92707	332112	467.46, 471.65(i), 471.65(j)	2	15	11			
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Ave, Santa Ana, CA 92704	332112	467.45	2	12	5			
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	2	12	8			
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave, Santa Ana, CA 92704	332112	467.46	2	10	5			
Amerimax Building Products	1-021102	1411 N. Daly St, Anaheim, CA 92806	332812	465.35	4	21	4			
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	2	10	0			
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	2	13	3			
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	3	11	12			
AnoChem Coatings	1-600295	1102 East Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	2	19	4			
Anodyne, Inc.	1-511389	2230 S. Susan St, Santa Ana, CA 92704	332813	433.17(a)	2	11	23			
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 W. Rowland St, Santa Ana, CA 92707	332813	433.17(a)	2	12	10			
APCT Anaheim	1-600689	250 E. Emerson Ave, Orange, CA 92865	334112	433.17(a)	2	19	10			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	2	13	30	Copper		
ARO Service	1-021192	1186 N. Grove St, Anaheim, CA 92806	336411	433.17(a)	2	10	4			
Arrowhead Operating Inc.	1-601062	219 First St, Huntington Beach, CA 92648	211111	403.5(d)	3	11	2			
Arrowhead Products Corporation	1-031137	4411 Katella Ave, Los Alamitos, CA 90720	336413	420.76, 420.96(c)(5), 471.35(a), 471.35(bb), 471.35(dd), 471.35(ff), 471.35(j), 471.35(l), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(a), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(s), 471.65(w), 471.65(x)	3	23	30	Fluoride		
Astech Engineered Products (3)	1-602005	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	2	28	7			New Class 1 Permit Issued
Astech Engineered Products, Inc. (Bldg. 2 Outside) (2)	Z-602004	3030 Red Hill Ave, Santa Ana, CA 92705	336412	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	1	0	0			New Zero Discharge Certification Issued
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	3	13	5			
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336413	433.17(a)	2	10	1			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325414	439.17, 439.27	2	37	51	Acetone		
B&B Enameling, Inc.	Z-331432	17591 Sampson Ln, Huntington Beach, CA 92647	332812	433.17(a)	0	0	0			
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.26, 463.36	2	21	5			
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	2	28	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	28	5			
B/E Aerospace Machine Products	Z-601769	7155 Fenwick Ln, Westminster, CA 92683	336419	433.17(a)	1	0	0			
Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	2	10	4			
Baxter Healthcare Corporation	1-601951	17511 Armstrong Ave, Irvine, CA 92614	339112	428.56(a)	0	0	0			New Class 1 Permit Issued
BAZZ HOUSTON CO.	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	3	7	8	O&G-min.		
Beckman Coulter, Inc.	1-521824	200 S. Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	2	7	3			
Beo-Mag Plating	1-511370	3313 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	2	12	13			
Beverage Visions LLC (Yorba Linda)	1-601449	24855 Corbit Pl, Yorba Linda, CA 92887	31193	403.5(d)	2	12	2			
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S. Placentia Ave, Placentia, CA 92870	311812	403.5(d)	3	11	1			
Bioduro LLC (Fairbanks)	1-601616	72 Fairbanks, Irvine, CA 92618	325412	439.47	2	24	5			
Bioduro LLC (Jeronimo)	1-601617	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	2	24	5			
Black Oxide Industries, Inc.	1-021213	1735 N. Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	2	13	4			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Blue Lake Energy	1-521785	5721 Casson Dr, Yorba Linda, CA 92886	211111	403.5(d)	3	9	2			
Blue Ribbon Container and Display, Inc.	1-601468	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	2	9	1			
Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	2	10	2			
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	2	13	4			
Brasstech, Inc	1-600316	1301 E. Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	2	9	1			
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221112	403.5(d)	3	17	2			
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	403.5(d)	2	9	3			
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	435.34(b)	3	14	2			
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	435.34(b)	2	13	2			
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	2	18	2			
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	2	8	1			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Bristol Industries	1-021226	630 E. Lambert Rd, Brea, CA 92821	332722	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(f), 471.65(u), 471.65(w), 471.65(x)	2	24	55	Zinc		
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	405.86	2	10	2			
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	405.86	2	7	2			
Cadillac Plating, Inc.	1-021062	1147 W. Struck Ave, Orange, CA 92867	332813	433.17(a)	3	17	28			
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	2	15	10			
Cali Chem Inc. dba Be Beauty	1-601976	14271 Corporate Dr, B Ste, Garden Grove, CA 92843	325620	417.86	2	13	3	O&G-min.		
California Faucets	Z-331431	5231 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	0	0	0			
California Gasket and Rubber Corporation	1-521832	533 W. Collins Ave, Orange, CA 92867	339991	428.66(a)	3	13	2			
CalNRG Operating, LLC	1-601486	2930 E. Frontera St. Unit A St, Anaheim, CA 92806	211111	403.5(d)	2	8	3			
Cargill, Inc.	1-031060	600 N. Gilbert St, Fullerton, CA 92833	311225	403.5(d)	3	15	12			
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	2	13	5			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
CD Video, Inc.	1-511076	12650 Westminster Ave, Garden Grove, CA 92843	334613	433.17(a)	3	10	4			
Chromadora, Inc.	1-511414	2515 S. Birch St, Santa Ana, CA 92707	332813	433.17(a)	2	18	26			
Circuit Technology, Inc.	1-521821	1911 N. Main St, Orange, CA 92865	334112	433.17(a)	2	13	4			
City of Anaheim - Public Utilities Dept	1-021073	6751 E. Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	3	10	27			
City of Anaheim Public Utilities (Water Services WRF)	1-521843	210 S. Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	2	4	0			
City of Anaheim, Public Utilities Department	1-600296	3071 E. Miraloma Ave, Anaheim, CA 92806	22112	403.5(d)	2	10	1			
City of Anaheim, Canyon Power Plant	1-600296	3071 E. Miraloma Ave, Anaheim, CA 92806	221121	403.5(d)	2	12	1			
City of Fullerton (Public Works Department)	1-601835	1580 W. Commonwealth Ave, Fullerton, CA 92833	921190	403.5(d)	2	10	2			
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	435.33(b)	2	9	8			
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	2	11	7			
City of Tustin Water Service (17th St.)	1-071013	18602 E.17th St, Santa Ana, CA 92705	221310	403.5(d)	2	10	1			
City of Tustin, Water Service (Main St)	1-071268	235 E. Main St, Tustin, CA 92780	221310	403.5(d)	1	0	0			
CJ Foods Manufacturing Corp.	1-521849	500 State College Blvd, Fullerton, CA 92831	311824	403.5(d)	2	5	4			Class 1 Permit Deactivated
CJ Foods Manufacturing LLC	1-602061	500 S. State College Blvd, Fullerton, CA 92831	311824	403.5(d)	1	6	1			New Class 1 Permit Issued
CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave, Costa Mesa, CA 92627	332911	433.17(a)	1	0	0			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St, Huntington Beach, CA 92649	334412	433.17(a)	6	15	14			Class 1 Permit Deactivated
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave, Garden Grove, CA 92841	332812	433.17(a)	2	0	1			
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	2	17	4			
Color Fashion Dye and Finishing, LLC	1-602149	1365 N. Knollwood Cir, Anaheim, CA 92801	313310	410.54	1	0	0			New Class 1 Permit Issued
Colores Powder Coating	Z-601858	2905 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, 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	13	14			New Class 1 Permit Issued
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	435.33(b)	3	15	1			
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	2	10	6			
Corru-Kraft Fullerton	1-601450	1911 E. Rossllyn Ave, Fullerton, CA 92831	322211	403.5(d)	3	11	2			
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	2	9	4			
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	2	9	3			
CPPG, Inc.	Z-321813	3911 E. Miraloma Ave, Anaheim, CA 92806	332813	433.17(a)	1	0	0			
Crest Coating, Inc.	1-021289	1361 S. Allec St, Anaheim, CA 92805	332812	433.17(a)	2	13	4			
CRH California Water, Inc.	1-011051	502 S. Lyon St, Santa Ana, CA 92701	312112	403.5(d)	1	4	2			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Custom Enamellers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	2	18	4			
Cytec Engineered Materials	Z-600005	1440 N. Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	1	0	0			
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W. Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	2	9	2			
Dae Shin USA, Inc.	1-031102	610 N. Gilbert St, Fullerton, CA 92833	313310	410.56	2	10	0			
Darling Ingredients, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	2	11	4			
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	2	18	30			
Data Solder, Inc.	1-521761	2915 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	2	13	4			
Dayton Flavors, Inc.	1-600038	580 S. Melrose St, Placentia, CA 92870	311930	403.5(d)	2	7	2			
Derm Cosmetic Labs, Inc.	Z-600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	0	0	0			
Diamond Environmental Services, LP	1-600244	1801 Via Burton, B Unit, Fullerton, CA 92831	562991	403.5(d)	3	12	2			
DNR Industries, Inc.	Z-601019	1562 S. Anaheim Blvd, A&B Ste, Anaheim, CA 92805	811111	433.17(a)	0	0	0			
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave, Fullerton, CA 92833	311930	403.5(d)	4	12	2	pH		
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	2	0	10			
DS Services of America	1-021393	1522 N. Newhope St, Santa Ana, CA 92703	312112	403.5(d)	2	5	1			
Ducommun Aerostructures, Inc.	1-021105	1885 N. Batavia St, Orange, CA 92865	336413	433.17(a)	2	14	14			
Dunham Metal Plating Inc.	1-601023	1764 N. Case St, Orange, CA 92865	332813	433.17(a)	2	15	10			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Dunham Metal Processing	1-021325	936 N. Parker St, Orange, CA 92867	332813	433.17(a)	2	12	4			
E&B Natural Resources- Angus Petroleum Corporation	1-600254	1901 California St, Huntington Beach, CA 92648	211111	403.5(d)	2	14	4			
Eco Pure LLC	1-601406	1920 Warner Ave, Suite 3-P, Santa Ana, CA 92705	812220	403.5(d)	2	7	2			
EFT Fast Quality Service, Inc.	1-011064	2328 S. Susan St, Santa Ana, CA 92704	334112	433.17(a)	2	13	4			
Elasco Urethane, Inc.	1-602026	11377 Markon Dr, Garden Grove, CA 92841	325211	414.56, 463.26	2	6	0			New Class 1 Permit Issued
Electro Metal Finishing Corporation	1-021158	1194 N. Grove St, Anaheim, CA 92806	332812	433.17(a)	2	2	30			
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	2	23	13			
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	2	11	32			
Electron Plating III, Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	2	17	9			
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	2	17	10			
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	12	Cyanide		
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	14	8			
Emerald SoCal, LLC / Emerald Orange	1-601615	1575 N. Case St, Orange, CA 92867	812332	403.5(d)	4	12	2			
Excello Circuits, Inc. (Hunter)	1-601356	5330 E. Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	2	21	1			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Expo Dyeing and Finishing, Inc.	1-031322	1365 Knollwood Cir, Anaheim, CA 92801	313310	403.5(d)	3	12	0			
Fabrica International, Inc.	1-011278	3201 S. Susan St, Santa Ana, CA 92704	314110	403.5(d)	2	10	0			
Fabrication Concepts Corporation	1-011068	1800 E. Saint Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	2	15	8			
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	2	13	4			
FMH Aerospace Corp.	1-600585	17072 Daimler St, Irvine, CA 92614	332912	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	2	16	36			
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	3	32	10			
Fullerton Custom Works, Inc.	Z-331424	1163 E. Elm Ave, Fullerton, CA 92831	332813	433.17(a)	1	0	0			
Gallade Chemical, Inc.	1-011257	1230 E. Saint Gertrude Pl, Santa Ana, CA 92707	422690	403.5(d)	2	9	2			
Gemtech Coatings	Z-600544	2737 S. Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	0	0	0			
Gemtech Coatings (Explorer)	1-601761	593 Explorer St, Brea, CA 92821	332812	433.17(a)	2	14	4			New Class 1 Permit Issued
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	2	11	6			
Gold Coast Baking Company, Inc.	1-601700	1505 E. Warner Ave, Santa Ana, CA 92705	311812	403.5(d)	5	14	2	pH		
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	417.166	2	17	13			
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	3	11	2	pH		

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Hannah Industries, Inc. DBA South Coast Water	1-511405	401 S. Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	2	10	3			Formerly listed as SOUTH COAST WATER
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336370	433.17(a)	4	15	12	Molybdenum		
Harry's Dye & Wash, Inc.	1-521746	1015 E. Orangethorpe Ave, Anaheim, CA 92801	313310	410.44, 410.54	2	10	5			
Hartwell Corporation	1-021381	900 Richfield Rd, Placentia, CA 92870	332999	403.5(d)	2	14	4			
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	435.34(b)	2	18	3			
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	2	15	20			
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell, Orange, CA 92865	332813	433.17(a)	3	18	14			
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	2	17	34			
House Foods America Corporation (East)	1-600906	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	2	10	0			
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	2	10	0			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Howmet Global Fastening Systems Inc.	1-021081	800 S. State College Blvd, Fullerton, CA 92831	332722	433.15(a), 433.17(a), 467.46, 471.35(dd), 471.35(ff), 471.35(l), 471.35(r), 471.35(t), 471.35(u), 471.35(v), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(u), 471.65(w), 471.65(x)	2	26	15	Cyanide Amenable		
Hyatt Die Cast & Engineering Corporation	Z-331236	4656 Lincoln Ave, Cypress, CA 90630	331523	464.16(a), 464.16(c), 464.16(h), 464.46(b), 464.46(d)	0	0	0			
Ideal Anodizing, Inc.	1-021041	1250 & 1270 N. Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	2	19	4			
Ikon Powder Coating, Inc.	1-521756	1375 N. Miller St, Anaheim, CA 92806	332812	433.17(a)	2	10	4			
Image Technology, Inc.	1-521755	1380 N. Knollwood Cir, Anaheim, CA 92801	325611	417.86	2	5	1			
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	405.86	2	10	2			
Independent Forge Company	Z-601008	692 N. Batavia St, Orange, CA 92868	332112	467.45	0	0	0			
Industrial Coating, Inc.	Z-601061	2990 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			
Industrial Metal Finishing, Inc.	1-521828	1941 Petra Ln, Placentia, CA 92870	332813	403.5(d)	2	8	3			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Intec Products, Inc.	1-021399	1145 N. Grove St, Anaheim, CA 92806	314999	410.36, 410.46	2	12	2			
International Paper Company (Anaheim)	1-521820	601 E. Ball Rd, Anaheim, CA 92805	322211	403.5(d)	2	5	4			
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	2	6	2			
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	2	10	2			
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	2	6	2			
Irvine Ranch Water District - DATS	1-011075	1704 W. Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	2	10	2			
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear, Irvine, CA 92618	339112	403.5(d)	2	11	1			
J and J Operators LLC	1-601614	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	3	10	2			
J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Ste, Newport Beach, CA 92663	336611	403.5(d)	3	9	3	Copper, Zinc		
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	2	15	7			
JD Processing, Inc. (West)	1-600978	2310 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	1	0	8			
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	3			
Joint Forces Training Base, Los Alamitos	1-031270	4230 Constitution Ave, 35 Bldg, Los Alamitos, CA 90720	928110	403.5(d)	2	11	1			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	4	0	4			
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N. Anaheim Blvd, Anaheim, CA 92801	423930	403.5(d)	2	5	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			
Koia Anaheim Facility, LLC	1-601767	4940 E. Landon Dr, Anaheim, CA 92807	311421	403.5(d)	3	11	0			
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	2	11	0			Class 1 Permit Deactivated
Kryler Corporation	1-021428	1217 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	2	19	4			
La Habra Bakery	1-031029	850 S. Cypress St, La Habra, CA 90631	311812	403.5(d)	3	11	6	pH		
La Habra Plating Company	Z-331399	900 S. Cypress, La Habra, CA 90631	332813	433.17(a)	1	0	0			
Legrand DPC, LLC	Z-601203	1443 S. Sunkist St, Anaheim, CA 928	423430	433.17(a)	1	0	0			Formerly listed as Ortronics, Inc.
LGM Subsidiary Holdings LLC	1-601313	17802 Gillette Ave, Irvine, CA 92614	325412	439.47	2	27	5			
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	334412	433.17(a)	2	11	4			
Linco Industries, Inc.	1-021253	528 S. Central Park Ave, West Dir, Anaheim, CA 92802	332812	433.17(a)	4	25	9	Cadmium, Cyanide		
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	2	14	10			
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	3	0	1			Class 1 Permit Deactivated
M.S. Bellows	1-111007	5322 McFadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	2	11	4			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Magma Finishing Corp.	Z-321810	2294 N. Batavia St, D Ste, Orange, CA 92865	332813	433.17(a)	1	0	0			
Magnetic Metals Corporation	1-531391	2475 W. La Palma Ave, Anaheim, CA 92801	334416	433.17(a)	2	11	4			
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	4	10	3			
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E. Rosslynn Ave, Fullerton, CA 92831	322211	403.5(d)	2	11	4			
Markland Manufacturing, Inc.	1-011046	1111 E. McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	8	32	9			Class 1 Permit Deactivated
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	2	4	2			
Maruchan, Inc. (Deere-South)	1-601021	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	2	4	2			
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, 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)	2	10	2			
Master Wash, Inc.	1-511399	3120 Kilson St, Santa Ana, CA 92707	811192	403.5(d)	2	8	2			
MBV-CA, LLC	1-602131	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	0	0	0			New Class 1 Permit Issued
McKenna Labs, Inc.	1-021422	1601 E. Orangethorpe Ave, Fullerton, CA 92831	325620	417.86, 439.47	2	29	24	Zinc		
McKenna Labs, Inc. (Acacia)	1-601842	1101 S. Acacia Ave, Fullerton, CA 92831	325620	417.86, 439.47	2	27	22			
MCP Foods, Inc.	1-021029	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	1	4	0			Class 1 Permit Deactivated
MCP Foods, Inc. Dba DSM-Firmenich	1-602062	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	1	5	0			New Class 1 Permit Issued Formerly listed as DSM-Firmenich, Inc.

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Meggitt Orange County	1-601843	4 Marconi, Irvine, CA 92618	334519	433.17(a)	2	7	10			
Merical, LLC	1-600655	233 E. Bristol Ln, Orange, CA 92865	325412	439.47	2	12	12			
MeriCal, LLC	1-602025	2995 E. Miraloma Ave, Anaheim, CA 92806	325411	439.47	2	12	12			New Class 1 Permit Issued Formerly listed as Merical, Inc. (Miraloma)
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	2	12	0			
Micro Precision Swiss, LLC	Z-601490	3233 W. Harvard St, Santa Ana, CA 92704	339113	433.17(a)	0	0	0			
Micrometals, Inc.	1-021153	5615 E. La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	3	14	3			
MTC Corp	1-600443	11161 Slater Ave, Fountain Valley, CA 92708	336111	426.66	2	10	1			
Murrietta Circuits	1-521811	5000 E. Landon St, Anaheim, CA 92807	334418	433.17(a)	2	13	4			
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	2	11	2			
National Construction Rentals	1-600652	1550 E. Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	1	8	2			
Neutron Plating, Inc.	Z-321812	2993 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	403.5(d)	2	20	6			
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	0	0	0			Class 1 Permit Deactivated
Newport Corporation	1-601837	1931 Deere Ave, Irvine, CA 92606	334516	433.17(a)	2	14	8			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	2	12	1			
Nikkiso ACD	Z-601703	2321 Pullman St, Santa Ana, CA 92705	334513	433.17(a)	0	0	0			
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	2	13	8			
Nor-Cal Beverage Co., Inc. (Main)	1-021284	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	2	11	0			Class 1 Permit Deactivated
O'Donnell Oil Company, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	403.5(d)	2	0	0			
O.C. Waste & Recycling	1-141018	20661 Newport Coast Dr, Newport Beach, CA 92657	562910	403.5(d)	2	10	2			
Oakley, Inc.	1-141012	1 Icon, Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	2	2	0			
Omni Metal Finishing, Inc.	Z-601973	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	2	0	0			
Omni Metal Finishing, Inc (Bldg.5)	Z-602132	11615 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	3	14	4			
Only Cremations for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	2	4	5			
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	2	0	0			
Orange County Chemical Supply, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	2	13	4			
OSI OPTO Electronics Inc. DBA Semicoa	1-601869	333 McCormick Ave, Costa Mesa, CA 92626	334413	433.17(a), 469.18(a)	2	0	0			Class 1 Permit Deactivated

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Pacific Chrome Services	Z-311396	603 E. Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	0	0	0			
Pacific Image Technology, Inc.	1-021070	1875 S. Santa Cruz St, Anaheim, CA 92805	334112	433.17(a)	3	18	4	Copper		
Pacific Western Container	1-511371	4044 W. Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	2	8	2			
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	0	0	0			
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W. Freedom Ave, Orange, CA 92865	562219	437.47(b)	2	18	13	4-Methylphenol, Arsenic, Titanium		
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W. Freedom Ave, Orange, CA 92865	562219	403.5(d)	2	11	4			
PCC Rollmet, Inc.	Z-601822	1822 Deere Ave, Irvine, CA 92606	33121	467.36(c), 471.35(i), 471.35(u), 471.35(v)	1	0	0			
PCX Aerosystems - Santa Ana	1-601618	2040 E. Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	2	4	9			
Performance Powder, Inc.	1-521805	2920 E. La Jolla St, Anaheim, CA 92806	332812	433.17(a)	2	13	6			
Petroprize Corporation	1-581180	319 20th St, Huntington Beach, CA 92648	211111	403.5(d)	3	12	2			
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	4	9	2			
Pioneer Circuits, Inc.	1-011262	3010 S. Shannon St, Santa Ana, CA 92704	334412	433.17(a)	2	17	11	Lead		
Platinum Surface Coating, Inc.	1-521852	1173 N. Fountain Way, Anaheim, CA 92806	332813	433.17(a)	3	10	5			
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way, Placentia, CA 92870	211111	403.5(d)	2	8	2			
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St, Yorba Linda, CA 92886	211111	403.5(d)	3	8	2			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Porter Powder Coating, Inc.	Z-321817	510 S. Rose St, Anaheim, CA 92805	332812	433.17(a)	0	0	0			
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N. Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	2	9	4			
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N. Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	2	9	4			
PowderCoat Services, LLC. Plant 5	1-600355	1747 W. Lincoln Ave, L1 Bldg, Anaheim, CA 92801	332812	433.17(a)	2	9	4			
Power Distribution, Inc.	1-511400	4011 W. Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	1	0	0			Class 1 Permit Deactivated
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	120 Second St, Huntington Beach, CA 92648	211111	403.5(d)	4	19	2			
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	2	16	14			
Precision Anodizing & Plating, Inc.	1-521809	1601 N. Miller St, Anaheim, CA 92806	332813	433.17(a)	2	19	10			
Precision Circuits West, Inc.	1-011008	3310 W. Harvard St, Santa Ana, CA 92704	334412	433.17(a)	2	15	4			
Precision Resource, California Division	1-111002	5803 Engineer Dr, Huntington Beach, CA 92649	332710	403.5(d)	2	10	4			
Precon, Inc.	1-021581	3131 E. La Palma Ave, Anaheim, CA 92806	332721	403.5(d)	2	15	11			
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	2	16	2	Zinc		
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	2	12	2			
Pulmuone Foods USA, Inc. (East)	1-601443	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	2	11	0			
Q-Flex Inc.	1-600337	1301 E. Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	3	14	3	Copper, Total Toxic Organics [§433.11e]		

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N. Cypress St, Orange, CA 92867	332112	467.45	2	12	5			
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N. Cypress St, Orange, CA 92867	332112	467.46	2	13	5			
Quikturn Professional Screenprinting	1-521858	567 S. Melrose St, Placentia, CA 92870	333249	403.5(d)	2	6	2			
Ram Screen Printing, Inc.	1-601652	3369 E. Miraloma Ave, Anaheim, CA 92806	323113	403.5(d)	2	8	4			
Rayne Dealership Corporation	1-571303	17835 Sky Park Cir, M Ste, Irvine, CA 92614	454390	403.5(d)	2	10	1			
RBC Transport Dynamics Corp.	1-011013	3131 W. Segerstrom Ave, Santa Ana, CA 92704	336413	433.17(a)	2	21	6	Cadmium, Cyanide		
Rich Products Corporation (North)	1-601022	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	2	10	2			
Rich Products Corporation (South)	1-511404	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	2	11	2			
Rigiflex Technology, Inc.	1-021187	1166 N. Grove St, Anaheim, CA 92806	334418	433.17(a)	2	8	10			
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	2811 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	2	11	12			
Robinson Pharma, Inc. (Harbor South - H1)	1-511412	3330 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	2	11	16			
Rolls-Royce High Temperature Composites, Inc.	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	2	6	1			Formerly listed as Rolls-Royce HTC
Rolls-Royce High Temperature Composites, Inc. (Fume Scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	2	6	1			Formerly listed as Rolls-Royce HTC (fume scrubber)
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 LotBlk, Huntington Beach, CA 92648	211111	403.5(d)	2	11	2			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
RP Finishing Group Inc.	Z-601358	1226 E. Ash Ave, Fullerton, CA 92831	332812	433.17(a)	0	0	0			
RSS Manufacturing	Z-600635	1261 Logan Ave, Costa Mesa, CA 92626	332913	433.17(a)	0	0	0			
S & C Oil Company, Inc. (2)	1-601637	18742 Goldenwest St, Huntington Beach, CA 92649	211111	403.5(d)	2	10	2			
Safety-Kleen Systems, Inc.	1-600690	2170 S. Yale St, Santa Ana, CA 92704	562211	403.5(d)	2	10	2			
Sanitor Corporation	1-601267	8400 Cerritos Ave, Stanton, CA 90680	325620	417.86, 439.47	2	14	14			
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	2	15	10			
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	3	19	10			
Santana Services	1-021016	1224 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	1	0	1	Chromium		Class 1 Permit Deactivated
Scientific Spray Finishes, Inc.	1-031311	315 S. Richman Ave, Fullerton, CA 92832	332812	433.17(a)	2	15	4			
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	3	10	1			
SFPP, LP	1-021619	1350 N. Main St, Orange, CA 92867	493190	403.5(d)	2	0	0			
Shepard Bros., Inc.	1-031034	503 S. Cypress St, La Habra, CA 90631	325611	417.166, 417.176	2	13	2			
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332721	433.17(a)	0	0	0			Class 1 Permit Deactivated
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	2	10	6			
Sioux Honey Association	1-602027	511 E. Katella Ave, Anaheim, CA 92805	311999	403.5(d)	2	0	1			New Class 1 Permit Issued
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	2	15	5			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	2	17	10			
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	2	10	2			
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3500 Ste A)	1-602000	3500 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	19	5			New Class 1 Permit Issued
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3506 Ste A)	1-602001	3506 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	19	2			New Class 1 Permit Issued
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3512 Ste A)	1-602002	3512 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	19	2			New Class 1 Permit Issued
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3524 Ste A)	1-602003	3524 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	2	19	2			New Class 1 Permit Issued
South Coast Circuits, Inc. (Bldg 3500 Ste A)	1-601444	3500 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	3506 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	3512 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	3524 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	3	4	1			
Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	3	9	1			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	3	5	1			
Spectrum Paint And Powder, Inc.	Z-321822	1332 S. Allec St, Anaheim, CA 92805	332812	433.17(a)	0	0	0			
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	3	12	4			
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E. Warner Ave, Santa Ana, CA 92705	332722	433.17(a), 467.16, 467.36(c), 467.46, 471.35(a), 471.35(ee), 471.35(ff), 471.35(g), 471.35(i), 471.35(j), 471.35(l), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(a), 471.65(d), 471.65(f), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	2	22	16	Cyanide		
Stainless Micro-Polish, Inc.	1-021672	1286 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	4	25	6	Chromium		
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W. Collins Ave, Orange, CA 92867	332119	403.5(d)	2	4	17			Class 1 Permit Deactivated

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	2	9	4			
Statek Corporation (Main)	1-021664	512 N. Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	2	15	3			
Statek Corporation (Orange Grove)	1-521777	1449 W. Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	2	15	1			
Stepan Company	1-021674	1208 N. Patt St, Anaheim, CA 92801	325613	417.106, 417.146, 417.166	2	14	12			
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave, Santa Ana, CA 92703	311511	405.16, 405.26, 405.76	2	12	0			
Summit Interconnect, Inc.	1-600012	223 N. Crescent Way, Anaheim, CA 92801	334412	433.17(a)	2	19	10			
Summit Interconnect, Inc., Orange Division	1-600060	230 W. Bristol Ln, Orange, CA 92865	334412	433.17(a)	3	20	10	Dissolved Sulfide, Sulfide		
Sunny Delight Beverages Co.	1-021045	1230 N. Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	2	9	0			
Superior Connector Plating, Inc.	1-021090	1901 E. Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	2	12	36			
Superior Processing (2)	1-601701	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	2	15	4			
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	6401 Regio Ave, Buena Park, CA 90620	311812	403.5(d)	2	6	0			
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	6491 Caballero Blvd, Buena Park, CA 90620	311991	432.126, 432.56	2	11	2	pH		
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	2	9	4			
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	2114 W. Ball Rd, Anaheim, CA 92804	333924	433.17(a)	2	21	4			
Terra Universal, Inc.	1-601407	800 S. Raymond Ave, Fullerton, CA 92831	333999	433.17(a)	2	0	0			

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
The Zygo Corporation, a division of Ametek, Inc	Z-602024	2031 Main St, Z Ste, Irvine, CA 92614	333314	433.17(a)	1	0	0			New Zero Discharge Certification Issued
Thermal-Vac Technology, Inc.	1-021282	1221 W. Struck Ave, Orange, CA 92867	332410	433.17(a)	2	15	10			
Thompson Energy Resources, LLC (Brea)	1-601469	3351 E. Birch St, Brea, CA 92821	211	435.34(b)	2	15	5			
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	423860	433.17(a)	2	13	5			
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	2	15	10			
Toyota Racing Development	1-071059	335 Baker St, Costa Mesa, CA 92626	336310	403.5(d)	2	9	7			
Transline Technology, Inc.	1-021202	1106 S. Technology Cir, Anaheim, CA 92805	334412	433.17(a)	2	16	4			
Tropitone Furniture Co., Inc.	1-141163	5 Marconi, Irvine, CA 92618	337124	433.17(a)	2	15	7			
TTM Technologies North America, LLC (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	2	19	9			Formerly listed as TTM Technologies North America, LLC. (Croddy)
TTM Technologies North America, LLC (Harbor)	1-511359	2640 S. Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	2	15	9			Formerly listed as TTM Technologies North America, LLC. (Harbor)
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St, Anaheim, CA 92806	334412	433.17(a)	2	14	5	Copper		Class 1 Permit Deactivated
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	403.5(d)	2	22	11			
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	3	22	1	Chromium		

**APPENDIX 1**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, JULY – DECEMBER 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	2	11	0			
Venus Laboratories, Inc. dba Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	2	12	3			
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St, Anaheim, CA 92806	423930	403.5(d)	2	7	0			
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325412	439.47	2	31	7			
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	0	0	0			
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	16122 Construction Circle West, Irvine, CA 92606	562212	403.5(d)	2	12	3			
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	2	6	2			
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	1260 N. Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	2	10	2			
West Newport Oil Company	1-061110	1080 W.17th St, Costa Mesa, CA 92627	211111	403.5(d)	1	0	2			Class 1 Permit Deactivated
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	435.34(b)	2	14	2			
Winonics (Brea)	1-031035	660 N. Puente St, Brea, CA 92821	334412	433.17(a)	2	15	4			
Winonics LLC. dba Bench 2 Bench Technologies	1-601974	1257 S. State College Blvd, Fullerton, CA 92831	334412	433.17(a)	2	16	11			
Yakult USA, Inc.	1-521850	17235 Newhope St, Fountain Valley, CA 92708	311511	403.5(d)	2	10	5			

# Appendix 2. SAWPA Monitoring and Compliance Status Report

---

1st and 2nd Quarters  
FY 2023/2024

**APPENDIX 2**  
**SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2023 – DECEMBER 31, 2023**  
**LIST OF SIUs WITH MONITORING COMPLIANCE STATUS**

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anita B. Smith Treatment Facility	Western Water	Direct	D1074-5	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	2	4	2			
Aramark Uniform & Career Apparel, LLC	Western Water	Direct	D1004-3	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	3	6	14			
California Institution for Men	IEUA	Direct	D1006-5	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	2	8	14			
Chino I Desalter	SAWPA	Direct	D1081-6	6905 Kimball Avenue Chino, CA 91709	221310	SIU	403.5(d)	-	2	4	2			
Chino II Desalter	SAWPA	Direct	D1010-6	11251 Harrel Street Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	8	4			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-2	715 East 4th Street Beaumont, CA 92223	221320	SIU	403.5(d)	-	2	4	4			
Dart Container Corporation	Western Water	Direct	D1019-5	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	2	4	12			
Del Real, LLC	JCSD	Direct	D1021-5	11041 Inland Avenue Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	2	20	14			
Eastside Water Treatment Plant	IEUA	Indirect	I1024-4	7537 Schaefer Avenue Ontario, CA 91761	221310	SIU	403.5(d)	-	2	9	32			
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-6	29541 Murrieta Road Menifee, CA 92586	221310	SIU	403.5(d)	-	2	8	4			
Inland Water Services	SBMWD	Indirect	I1066-4.1	939 W. Reece Street San Bernadino, CA 92411	238220 454390 561990	SIU	403.5(d)	-	2	13	4			
In-N-Out Burger, Chino Distribution Center	IEUA	Direct	D1134-1	16000 Quality Way, Chino, CA 91708	493120 722513	SIU	403.5(d)	-	3	19	20			
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-6	4786 Etiwanda Avenue Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	2	14	16			
JCSD Hamner Metering Station	SAWPA	Direct	D1045-6	5410 Hamner Avenue Eastvale, CA 91752	221320	SIU	403.5(d)	-	2	8	8			
JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SAWPA	Direct	D1070-6	4150 Etiwanda Avenue Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	1	4			
JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-5	3474 De Forest Circle Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	2	0	0			
JCSD Wineville Metering	SAWPA	Direct	D1048-6	5101 Wineville Avenue	221320	SIU	403.5(d)	-	2	7	16			

**APPENDIX 2**  
**SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2023 – DECEMBER 31, 2023**  
**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
Station				Jurupa Valley, CA 91752										
Metal Container Corporation	JCSD	Direct	D1056-5	10980 Inland Avenue Jurupa Valley, CA 91752	332431	CIU	465.45(d)	-	2	19	8			
Mission Linen Supply	IEUA	Direct	D1057-5	5400 Alton Street Chino, CA 91710	812332	SIU	403.5(d)	-	2	22	20			
Mountainview Generating Station	VALLEY	Direct	D1058-4	2492 W. San Bernardino Ave. Redlands, CA 92374	221112	CIU	423.17	Y	2	10	11			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-3	1401 N. Alder Avenue Rialto, CA 92376	312112	SIU	403.5(d)	-	2	6	0			
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-3	1401 N. Alder Avenue Rialto, CA 92376	312112	SIU	403.5(d)	-	2	12	14			
OLS Energy	IEUA	Direct	D1059-5	5601 Eucalyptus Avenue Chino, CA 91710	221112	CIU	423.17	Y	2	19	19			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-5	3400 Pyrite Street Jurupa Valley, CA 92509	562910 562211	SIU	403.5(d)	-	2	16	124			
Repet, Inc.	IEUA	Direct	D1069-5	14207 Monte Vista Avenue Chino, CA 91710	423930	SIU	403.5(d)	-	3	20	23			
Rialto Bioenergy Facility, LLC	VALLEY	Direct	D1130-2	503 E. Santa Ana Avenue Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	3	12	203			
Skorpios Technologies, Inc.	EMWD	Indirect	I1136-1	41915 Business Park Drive Temecula, CA 92590	334413	CIU	469.18	Y	2	6	4			
Temescal Desalter	Western Water	Direct	D1012-5	745 Public Safety Way Corona, CA 92880	221310	SIU	403.5(d)	-	2	4	3			
Wellington Foods, Inc.	Western Water	Direct	D1086-5.1	1930 California Avenue Corona, CA 92881	311999 325412	CIU	439.47	-	2	6	14			CIU Permit issued
WMWD Arlington Desalter	SAWPA	Direct	D1088-6	11611 Sterling Avenue Riverside, CA 92503	221310	SIU	403.5(d)	-	2	4	2			
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-5	880 W. County Line Road Calimesa, CA 92320	221320 221310	SIU	403.5(d)	-	2	4	4			

**Abbreviations**

CIU	Categorical Industrial User
EMWD	Eastern Municipal Water District
IEUA	Inland Empire Utilities Agency
JCSD	Jurupa Community Services District
NAICS	North American Industry Classification System
SAWPA	Santa Ana Watershed Project Authority
SBMWD	San Bernardino Municipal Water Department
SIU	Significant Industrial User
SMR	Self-Monitoring Report
SNC	Significant Noncompliance
TSS	Total Suspended Solids
TTO	Total Toxic Organics
Valley	San Bernardino Valley Municipal Water District