

2022-23

# Annual Report

**RESOURCE PROTECTION DIVISION**

PRETREATMENT PROGRAM



10844 Ellis Avenue  
 Fountain Valley, CA 92708  
 714.962.2411  
 www.ocsan.gov

October 31, 2023

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  
 FY 2022/23 Pretreatment Program Annual Report

In accordance with the requirements of NPDES Permit No. CA0110604, attached please find the FY 2022/23 Pretreatment Program Annual Report which provides information on the Orange County Sanitation District's (OC San's) pretreatment program for the period of July 1, 2022 through June 30, 2023.

The attached annual report provides an update on the status of OC San's pretreatment program in achieving its requirements and objectives. Information is also provided on how the program is administered, the resources used to manage the program, the compliance status of industrial users, and the impact of source control efforts on wastewater and biosolids quality.

Some of the program's highlights for this fiscal year are summarized below:

- ▶ The program has continued to effectively reduce heavy metals discharges. Since 1976/77, the total mass of heavy metals entering OC San's system has decreased by 90% while the mass of metals discharged to the marine environment has decreased by 99%. The influent heavy metals to OC San's treatment plant meet our NPDES effluent standards before wastewater treatment has occurred.
- ▶ During FY 2022/23, 1,542 inspections of facilities were conducted, and 3,591 samples were collected for analysis. In addition to warning notices and self-monitoring notices, 232 separate enforcement actions were taken against noncompliant significant industrial users in FY 2022/23, including compliance meetings and inspections, and the issuance of fees, penalties, enforcement orders and administrative complaint settlements. Over \$67,326 in noncompliance fees and penalties were issued.
- ▶ During FY 2022/23, OC San continued its oversight of IRWD's and SAWPA's pretreatment programs, information on IRWD and SAWPA can be found in Chapter 7 and Appendices G and H of this report.

Should you have any questions regarding the information provided in the report or wish to meet with OC San staff to discuss the report in more detail, please contact me at your convenience at (714) 593-7424.

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

JAD:aps

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



10844 Ellis Avenue  
 Fountain Valley, CA 92708  
 714.962.2411  
 www.ocsan.gov

October 31, 2023

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 January 1 through  
 June 30, 2023

As authorized by NPDES Permit No. CA0110604, the Pretreatment Program Semi-Annual Report information for January 1 through June 30, 2023 has been submitted as part of the Orange County Sanitation District's (OC San's) Pretreatment Program Annual Report for the period of July 1, 2022 through June 30, 2023. Enforcement action and compliance status information has been divided into appropriate six-month summaries.

Should you have any questions regarding the information provided in the report or wish to meet with OC San staff to discuss the report in more detail, please contact me at your convenience at (714) 593-7424.

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

JAD:aps  
 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

**POTW PRETREATMENT PROGRAM ANNUAL REPORT  
CERTIFICATION STATEMENT**

---


NPDES Permit Holder: Orange County Sanitation District  
Report Due Date: October 31, 2023  
Period Covered by this Report: July 2022 through June 2023  
Period Covered by Previous Report: July 2021 through June 2022\*  
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."*

October 31, 2023  
Date

  
Mark Kawamoto, P.E.  
Environmental Protection Manager, Source Control

## Table of Contents

List of Tables .....	i
List of Figures.....	iii
List of Appendices.....	iii
List of Abbreviations.....	iv
Glossary of Defined Terms .....	vii
Executive Summary .....	E.1
E.1    Background .....	E.1
E.2    Introduction.....	E.1
E.2.1    Pretreatment Program Summary .....	E.1
E.2.2    Pretreatment Program Elements.....	E.3
E.2.3    Compliance with NPDES Discharge Requirements.....	E.4
Chapter 1 . NPDES Requirements – Pretreatment .....	1.1
1.1    Pretreatment Requirements – Compliance with National Pollutant Discharge Elimination System (NPDES) Permit Requirements.....	1.1
Chapter 2 . OC San Facilities and Compliance with Discharge Requirements .....	2.1
2.1    Introduction.....	2.1
2.2    Existing OC San Facilities.....	2.1
2.2.1    Description of Treatment Plants.....	2.2
2.2.1.1    Reclamation Plant No. 1 .....	2.2
2.2.1.2    Treatment Plant No. 2 .....	2.3
2.2.1.3    Joint Works Facilities .....	2.5
2.3    Compliance with National Pollutant Discharge Elimination System (NPDES) Requirements ...	2.5
2.4    Effluent Characteristics .....	2.7
2.4.1    General.....	2.7
2.4.2    Suspended Solids .....	2.7
2.4.3    Carbonaceous Biochemical Oxygen Demand (BOD-C) .....	2.7
2.4.4    Oil and Grease .....	2.7
2.4.5    Settleable Solids.....	2.7
2.4.6    Turbidity.....	2.7
2.4.7    pH.....	2.8
2.4.8    Toxicity .....	2.8
2.5    Facilities Special Projects .....	2.9
2.5.1    Plant No. 1 Headworks Rehabilitation.....	2.9
2.5.2    Plant No. 2 TPAD Digester Facility .....	2.9
2.5.3    Plant No. 2 Return Activated Sludge Piping Replacement .....	2.9
2.5.4    Plant No. 2 Outfall Low Flow Pump Station .....	2.9
2.6    Metals.....	2.9
2.7    Mass Emission Benchmarks .....	2.10

2.8	Performance Goals .....	2.14
2.8.1	Background .....	2.14
2.8.2	Total Chromium.....	2.14
2.8.3	Total Cyanide .....	2.15
2.8.4	Chlorinated Phenols .....	2.16
Chapter 3	. Permits .....	3.1
3.1	Introduction.....	3.1
3.2	Permit Classifications .....	3.1
3.3	Permit Issuance.....	3.2
3.3.1	Identification of New Permittees.....	3.2
3.4	Discharge Limits.....	3.3
3.4.1	Industrial.....	3.3
3.4.2	Wastehaulers .....	3.4
3.5	Establishing Mass Emission Rates (MER).....	3.4
Chapter 4	. Inspection, Sampling, Compliance, & Enforcement.....	4.1
4.1	Introduction.....	4.1
4.2	Routine Inspection and Sampling .....	4.1
4.3	Non-Routine Sampling and Inspection .....	4.2
4.3.1	Downstream Sampling .....	4.2
4.4	Orange County Hazardous Materials Strike Force and Joint Agency Inspections .....	4.2
4.5	Industrial Compliance Status with Discharge Limits .....	4.3
4.5.1	Industries in Significant Noncompliance (SNC) .....	4.3
4.6	Enforcement Activities.....	4.5
4.6.1	Compliance Inspections .....	4.6
4.6.2	Compliance Meetings.....	4.6
4.6.3	Compliance Requirement Letters.....	4.6
4.6.4	Order to Cease/Terminate Noncompliance/Discharge .....	4.6
4.6.5	Notices of Violation – Noncompliance Fees and Penalties .....	4.6
4.6.6	Notices to Inform – Intentional Falsification of Self-Monitoring Reports .....	4.6
4.6.7	Probation Orders .....	4.6
4.6.8	Enforcement Compliance Schedule Agreement .....	4.7
4.6.9	Regulatory Compliance Schedule Agreement (RCSA).....	4.7
4.6.10	Administrative Complaints, Penalties, and Settlement Agreements .....	4.7
4.6.11	Permit Suspensions .....	4.7
4.6.12	Permit Revocations .....	4.8
4.6.13	Emergency Suspension Order .....	4.8
4.6.14	Civil/Criminal Complaints .....	4.8
4.7	Enforcement Summary .....	4.8
Chapter 5	. Pretreatment Program Staffing, Costs, and Field Equipment.....	5.1

5.1	Introduction.....	5.1
5.2	Staffing, Revenues, and Costs.....	5.1
5.2.1	Staffing .....	5.1
5.2.2	Revenues .....	5.1
5.2.3	Program Costs .....	5.1
5.3	Field Equipment .....	5.2
5.3.1	Equipment Inventory .....	5.2
Chapter 6 . Pretreatment Program Status .....		6.1
6.1	Introduction.....	6.1
6.2	Public Participation.....	6.1
6.3	Wastehauler Program .....	6.1
6.3.1	Wastehauler Permitting .....	6.1
6.3.2	Wastehauler Discharges .....	6.1
6.3.3	Wastehauler Monitoring .....	6.2
6.4	Inspection and Sampling.....	6.3
6.5	Quality Assurance and Quality Control (QA/QC) Activities.....	6.3
6.5.1	QA/QC Program Tasks .....	6.3
6.5.2	QA/QC Sampling Results.....	6.4
6.5.3	QA/QC Conclusions .....	6.6
6.6	Total Toxic Organics Waiver Program .....	6.7
6.7	Special Purpose Discharge Permit Program .....	6.11
6.7.1	SPDP Metrics and Trends.....	6.11
6.7.2	SPDP Program Enforcement .....	6.11
6.7.3	SPDP Regulatory Program .....	6.12
6.8	Self-Monitoring Program .....	6.12
6.9	Industrial Operations and Maintenance Improvement Program .....	6.12
6.10	Annual Technical Review of Local Limits.....	6.13
6.11	Significant Changes in Operating the Pretreatment Program.....	6.14
Chapter 7 . Interaction with Other Agencies .....		7.1
7.1	Introduction.....	7.1
7.2	Los Angeles County Sanitation District Nos. 18 and 19 Flow Accommodation Agreement .....	7.1
7.3	Irvine Ranch Water District (IRWD) .....	7.1
7.3.1	IRWD Operating Permit, Regional Board Order R8-2015-0024 .....	7.2
7.3.2	IRWD Analytical Reporting.....	7.2
7.3.3	Inorganic Pollutants.....	7.3
7.3.4	Organic Pollutants .....	7.6
7.3.5	Discussion of the List of Industrial Users .....	7.6
7.3.6	Discussion of Industrial User Compliance Status .....	7.8
7.3.7	Summary of SIU Compliance .....	7.8

7.3.8	Discussion of Significant Changes in the Pretreatment Program .....	7.9
7.3.9	Pretreatment Program Costs .....	7.9
7.3.10	Equipment Purchases for FY 2022 – 2023 .....	7.9
7.3.11	Discussion of Public Participation Activities .....	7.10
7.3.12	Discussion of Biosolids Treatment and Recycling Activities .....	7.10
7.3.13	IRWD Additional Information .....	7.10
7.4	Santa Ana Watershed Project Authority (SAWPA) .....	7.13
7.4.1	Brine Line System Pretreatment Program Overview .....	7.13
7.4.2	SAWPA, Member Agency, and Contract Agency Pretreatment Programs.....	7.14
7.4.2.1	The City of Beaumont (Beaumont).....	7.14
7.4.2.2	Eastern Municipal Water District (EMWD) .....	7.14
7.4.2.3	Inland Empire Utilities Agency (IEUA).....	7.15
7.4.2.4	Jurupa Community Services District (JCSD) .....	7.17
7.4.2.5	San Bernardino Municipal Water Department (SBMWD) .....	7.17
7.4.2.6	San Bernardino Valley Municipal Water District (Valley District) .....	7.18
7.4.2.7	Santa Ana Watershed Project Authority (SAWPA) .....	7.20
7.4.2.8	Western Municipal Water District (Western Water) .....	7.21
7.4.2.9	Yucaipa Valley Water District (YVWD) .....	7.21
7.4.3	Self-Monitoring Program .....	7.22
7.4.4	Field Inspection, Sampling, and Monitoring QA/QC .....	7.22
7.4.5	Identification of New Permittees.....	7.22
7.4.6	Future Projects That Will Affect Quantity of Discharge to the Brine Line .....	7.25
7.4.7	SAWPA Special Projects .....	7.25
7.4.8	SAWPA Member and Contract Agency Ordinances and Resolutions .....	7.26
7.4.9	Public Participation.....	7.26
7.4.10	Permittees in Significant Noncompliance.....	7.27
7.4.10.1	Summary of Permittees in SNC Newspaper Notice.....	7.27
7.4.11	Non-Industrial Source Control and Public Education Programs .....	7.27
7.4.12	Other Public Participation.....	7.28
7.4.13	Changes to the SAWPA Pretreatment Program .....	7.29
7.4.14	Pretreatment Program Budget .....	7.30
7.4.15	Equipment Inventory Listing .....	7.31
7.4.16	SAWPA Pretreatment Program Training .....	7.32
Chapter 8	Solids Management Program.....	8.1
8.1	Introduction.....	8.1
8.2	Biosolids Quality.....	8.1
Chapter 9	Non-Industrial Source Control and Public Education Programs .....	9.1
9.1	Introduction.....	9.1
9.2	Fats, Oils, and Grease (FOG) Control Program .....	9.1



9.2.1	Fats, Oils, and Grease Control.....	9.1
9.2.2	John Wayne Airport FSEs.....	9.4
9.3	Radiator Shops.....	9.4
9.4	Dry Cleaners .....	9.4
9.5	Dry Weather Urban Runoff Diversions.....	9.5
9.5.1	Dry Weather Diversion Systems and Urban Runoff Flow .....	9.6
9.5.2	Proposed Dry Weather Urban Runoff Diversion Systems .....	9.9
9.5.3	Dry Weather Urban Runoff Quality .....	9.10
9.5.4	Dry Weather Urban Runoff Diversion Locations .....	9.11
9.5.5	Dry Weather Urban Runoff Diversion Enforcement Actions .....	9.11
9.6	Dental Amalgam Source Control Program.....	9.12
9.7	Public Education and Outreach.....	9.12

**List of Tables**

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2022/23 ..... 2.2

Table 2.2 NPDES Permit Discharge Requirements and OC San’s Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2022/23 ..... 2.6

Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2018/19 – 2022/23..... 2.7

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2018/19-2022/23 ..... 2.8

Table 2.5 Final Effluent Yearly Toxicity Results for Fiscal Years 2018/19-2022/23 ..... 2.9

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2018/19-2022/23 ..... 2.10

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2022/23 ..... 2.11

Table 2.8 Parameters with Two or More Consecutive Monthly Exceedances of their Performance Goals ..... 2.14

Table 2.9 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Three Consecutive Monthly Exceedances ..... 2.15

Table 2.10 Performance Goals - Parameters with Two Consecutive Monthly Exceedances ..... 2.15

Table 2.11 Fiscal Year 2022-2023 Monthly Performance Goals for Parameters with Two Consecutive Monthly Exceedances ..... 2.16

Table 2.12 Performance Goal Data for Fiscal Year 2022-2023..... 2.18

Table 3.1 OC San’s Maximum Allowable Local Discharge Limits ..... 3.4

Table 3.2 OC San’s Maximum Allowable Discharge Limits for Wastehaulers Discharging Domestic Septage to OC San Wastehauler Stations ..... 3.4

Table 4.1 Summary of Inspections, Sampling and Laboratory Analyses, Fiscal Years 2018/19 – 2022/23 ..... 4.1

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2022/23 Orange County Sanitation District, Resource Protection Division ..... 4.4

Table 5.1 Summary of Total Costs and Total Labor for the Pretreatment Program, Fiscal Years 2018/19 – 2022/23 ..... 5.1

Table 5.2 Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2022/23 ..... 5.2

Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2018/19-2022/23 ..... 6.2

Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2022/23..... 6.2

Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San’s Disposal Station, FY 2018/19-2022/23 ..... 6.2

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2022/23 ..... 6.4

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2022/23 ..... 6.5

Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2022/23 ..... 6.6

Table 6.7 Permittees with TTO Waivers July 1, 2022 – June 30, 2023..... 6.7

Table 6.8 Technical Review of Local Limits ..... 6.13

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas ..... 7.7

Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2021 – 2022 and 2022 – 2023 ..... 7.9

Table 7.3	Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2022-2023 .....	7.10
Table 7.4	Summary of SAWPA Special Projects, July 1, 2022 – June 30, 2023 .....	7.26
Table 7.5	Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2022– June 30, 2023 .....	7.27
Table 7.6	Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2022/23.....	7.32
Table 8.1	Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2022/23, in Milligrams per Dry Kilogram .....	8.1
Table 9.1	Non-Industrial Source Control Programs, FY 2022/23 .....	9.1
Table 9.2	FOG Program Effectiveness, FY 2022/23 .....	9.3
Table 9.3	Dry Weather Urban Runoff Discharges, FY 2016/17 – 2022/23 .....	9.7
Table 9.4	Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2022/23 .....	9.8
Table 9.5	Dry Weather Urban Runoff Diversion Program, FY 2022/23.....	9.9
Table 9.6	Dry Weather Urban Runoff Compliance, FY 2022/23.....	9.10

## List of Figures

Figure ES-1-1	Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years .....	E.2
Figure 2-1	Map of Orange County Sanitation District's Service Area .....	2.4
Figure 7-1	MWRP Effluent Total Dissolved Solids (Annual Average).....	7.3
Figure 7-2	MWRP Influent and Effluent Total Heavy Metals and Cyanide .....	7.4
Figure 7-3	MWRP Influent and Effluent Copper.....	7.5
Figure 7-4	MWRP Influent and Effluent Zinc.....	7.5
Figure 7-5	MWRP Influent and Effluent Organic Pollutants .....	7.6
Figure 7-6	MWRP Influent Flow .....	7.11
Figure 7-7	MWRP Influent and Effluent Selenium.....	7.11
Figure 8-1	Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.4
Figure 8-2	Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2022/23.....	8.5
Figure 8-3	Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.5
Figure 8-4	Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.6
Figure 8-5	Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.6
Figure 8-6	Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.7
Figure 8-7	Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.7
Figure 8-8	Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.8
Figure 8-9	Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.8
Figure 8-10	Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2022/23 .....	8.9

## List of Appendices

Appendix A.	Monitoring and Compliance Status Report
Appendix B.	Summary of Priority Pollutants and Trace Constituents Analyses
Appendix C.	Priority Pollutants
Appendix D.	Fees/Penalties for Noncompliance
Appendix E.	Public Notice of Significantly Noncompliant Industries
Appendix F.	Acknowledgements
Appendix G.	Irvine Ranch Water District (IRWD) Sampling
Appendix H.	Santa Ana Watershed Project Authority (SAWPA) Reports, Data, SNC Notice
Appendix I.	QA/QC Analysis Results
Appendix J.	Permittees with Pretreatment Equipment

## List of Abbreviations

<b>Acronym or abbreviation</b>	<b>Full phrase</b>	<b>Glossary</b>
BMPs	Best Management Practices	
BOD	Biochemical Oxygen Demand	
CAN	Corrective Action Notice	
CCB	chlorine contact basin	
CCTV	closed-circuit television	
CDS	Continuous Deflective Separation	
CEPT	Chemically Enhanced Primary Treatment	
CGS	Central Power Generation System	
CIP	Clean in Place	
CIU	Categorical Industrial Users	
CNB	City of Newport Beach	
CWA	Clean Water Act	
CWEA	California Water Environment Association	
DAF	Dissolved Air Flotation	
ECSA	Enforcement Compliance Schedule Agreements	
EMWD	Eastern Municipal Water District	
EPA	Environmental Protection Agency	
EQ	exceptional quality	
ERP	Enforcement Response Plan	
FOG	fats, oils, and grease	
FSEs	Food Service Establishments	
FTE	full time equivalent	
FTU	fixed treatment unit	
FVM	fluvoxamine	
FY	fiscal year	
GAP	Green Acres Project	
GI	grease interceptors	
GIS	geographic information system	
GWRS	Groundwater Replenishment System	
HC	hydrocarbon	
ICP	Inductively Coupled Plasma	
IEUA	Inland Empire Utilities Agency	
IPA	isopropyl alcohol	
IRWD	Irvine Ranch Water District	
IU	Industrial User	
IUS	Industrial User Survey	
IX	Ion Exchange	
JCSD	Jurupa Community Services District	
JPA	Joint Powers Authority	

<b>Acronym or abbreviation</b>	<b>Full phrase</b>	<b>Glossary</b>
LACSD	Los Angeles County Sanitation Districts	
LAWD	Los Alisos Water District	
LAWRP	Los Alisos Water Reclamation Plant	
LWH	Liquid Waste Haulers	
MAHL	Maximum allowable headworks loading	
MAIL	Maximum allowable industrial loading	
MBR	Membrane Bioreactor	
MER	Mass Emission Rates	
MDL	method detection limits	
MGD	million gallons per day	
ML	minimum level	
MOUs	Memorandums of Understanding	
MPIO	Monitoring/Production Information Order (SAWPA only)	
MS4	Municipal Separate Storm Sewer System	
MWRP	Michelson Water Recycling Plant, IRWD	
NAICS	North American Industry Classification System	
NISC	Non-Industrial Source Control	
NOV	Notice of Violation	
NTU	nephelometric turbidity unit	
NPDES	National Pollutant Discharge Elimination System	
O&M	Operations and Maintenance	
OCA	Order for Corrective Action	
OCFCD	Orange County Flood Control District	
OCHCA	Orange County Health Care Agency	
OCPW	Orange County Public Works	
OCSD/OC San	Orange County Sanitation District	
OCTR	one-time compliance report	
OCWD	Orange County Water District	
ORP	oxidation-reduction potential	
OSHA	Occupational Safety & Health Administration	
PCB	polychlorinated biphenyls	
PERC	perchloroethylene	
POTW	Publicly Owned Treatment Works	
PPCDs	Pretreatment Program Control Documents	
PSES	Pretreatment Standards for Existing Sources	
PSNS	Pretreatment Standards for New Sources	
PTP	Potable Treatment Plant	
PTS	pretreatment systems	
RAS	Return Activated Sludge	
RCSA	Regulatory Compliance Schedule Agreement	
RL	reporting limit	

<b>Acronym or abbreviation</b>	<b>Full phrase</b>	<b>Glossary</b>
RO	reverse osmosis	
RPD	relative percent difference	
SARI	Santa Ana River (sometimes "Regional") Interceptor	
SARWQCB, Regional Board	Santa Ana Regional Water Quality Control Board	
SAWPA	Santa Ana Watershed Project Authority	
SBMWD	San Bernardino Municipal Water Department	
SCAP	Southern California Alliance of Publicly Owned Treatment Works	
SCAQMD	South Coast Air Quality Management District	
SCE	Southern California Edison	
SCFCC	Supplemental Capacity Facilities Capacity Charge	
SIUs	Significant Industrial Users	✓
SLCP	Slug Load Control Plan	
SMR	Self-Monitoring Reports	
SNC	Significant Noncompliance	
SOCWA	South Orange County Wastewater Authority	
SPDP	Special Purpose Discharge Permit	✓
SS	suspended solids	
SSMP	Sewer System Management Plan	
SWRCB	State Water Resources Control Board	
SSOs	Sanitary Sewer Overflows	
TELL	Technical Evaluation of Local Limits	✓
TDS	Total Dissolved Solids	
TMDL	Total Maximum Daily Load	
TOMP	Toxic Organic Management Plan	
TRC	Technical Review Criteria	
TRLL	Technical Review of Local Limits	✓
TSS	Total Suspended Solids	
TST	Test of Significant Toxicity	
TTOs	Total Toxic Organics	✓
UV	ultraviolet	
Valley District	San Bernardino Valley Municipal Water District	
WDR	Waste Discharge Requirements	
Western Water	Western Municipal Water District	
WRCRWA SRPS	West Riverside County Regional Wastewater Authority South Regional Pumping Station	
YVWD	Yucaipa Valley Water District	
YVRWFF	Yucaipa Valley Regional Water Filtration Facility	

## Glossary of Defined Terms

Term	Definition	Citation
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 OC San, its treatment processes or operations, or its biosolids processes, use, or disposal; or b) is a cause of a violation of any requirement of OC San'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 to a user by OC San to discharge unpolluted water, storm runoff, or groundwater to OC San's Sewerage Facilities.	Ordinance, Section 305

Term	Definition	Citation
Technical Evaluation of Local Limits	The technical evaluation of local limits is a study which develops enforceable local requirements to address Federal standards as well as State and local regulations including, but not limited to, passthrough and interference. The study takes into account influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
Technical Review of Local Limits	The technical review of local limits is a study which reviews changes that impact existing enforceable local requirements to address federal standards as well as state and local regulations including, but not limited to, Pass Through and Interference. The review takes into account impacts of influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy since the last technical evaluation and may predicate a local limits update.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
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
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

## **Executive Summary**

### **E.1 Background**

Recognizing the need to control the quality and quantity of wastewaters discharged to the sewerage system, in February 1954, OC San's Board of Directors adopted the first ordinance regulating the use of the sewerage system. This ordinance was subsequently revised and amended in February 1958, April 1970, July 1976, July 1983, September 1989, February 1992, July 1998, July 2008, October 2009, July 2016, and most recently in July 2019 (collectively known as OC San's *Wastewater Discharge Regulations*, "Ordinance"). The 1970 revision formally established OC San's Industrial Waste Division to issue permits, set flow and quality limits, and monitor and inspect industrial discharges to the sewerage system. Substances monitored and regulated included: oil and grease of mineral and petroleum origin, organic materials, dissolved solids, suspended solids, phenolic compounds, radioactive wastes, combustible materials, and any other contaminants that had the potential to degrade wastewater treatment processes or cause problems in the sewerage facilities. In July 1976, the ordinance was revised to include heavy metal limits.

In July 1983, the Ordinance was further amended to include enforcement of the EPA's federal categorical pretreatment standards and to modify local discharge limits for cadmium, copper, polychlorinated biphenyls, pesticides, and Total Toxic Organics. OC San's pretreatment program was approved by the EPA in January 1984. In September 1989, the Ordinance was revised to streamline administrative and enforcement procedures, incorporate EPA regulations adopted since 1983, clarify the intent of the program through added definitions and procedures, and include Special Purpose Discharge Permit requirements and conditions. In February 1992, the Ordinance was amended to revise defined terms, initiate noncompliance sampling fees, and include language giving OC San authority to levy administrative penalties according to changes in state law enacted in January 1992. In July 1998, revisions were made primarily for the deletion of Class III permits, which were issued for the collection of user charges for the discharge of domestic waste. In July 2008, revisions were made regarding the application of tax credits for user charges, and to include Dry Weather Urban Runoff Diversion permit requirements and conditions. In October 2009, the Ordinance was revised to provide clarification regarding transfer of permit ownership. In February 2016, the Ordinance was revised to remove the numeric BOD concentration limit, the cyanide amenable and Total Toxic Organic limits; revised chromium and silver limits; and added 1,4-dioxane, molybdenum, and selenium limits. The most recent revision was adopted in May 2019, and became effective in July 2019, establishing additional discharge requirements and prohibitions but with no change to the local discharge limits.

### **E.2 Introduction**

The fiscal year (FY) 2022/23 OC San Annual Report provides the following:

- Information about the industrial pretreatment program as required by OC San's National Pollutant Discharge Elimination System (NPDES) permit issued by the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB), and the Environmental Protection Agency (EPA); and
- Information on how OC San's pretreatment program is administered; industrial permittees' compliance status; dischargers' effect on OC San's influent, effluent, and biosolids; the labor, equipment, and capital resources used for the program during the fiscal year; and other documentation.

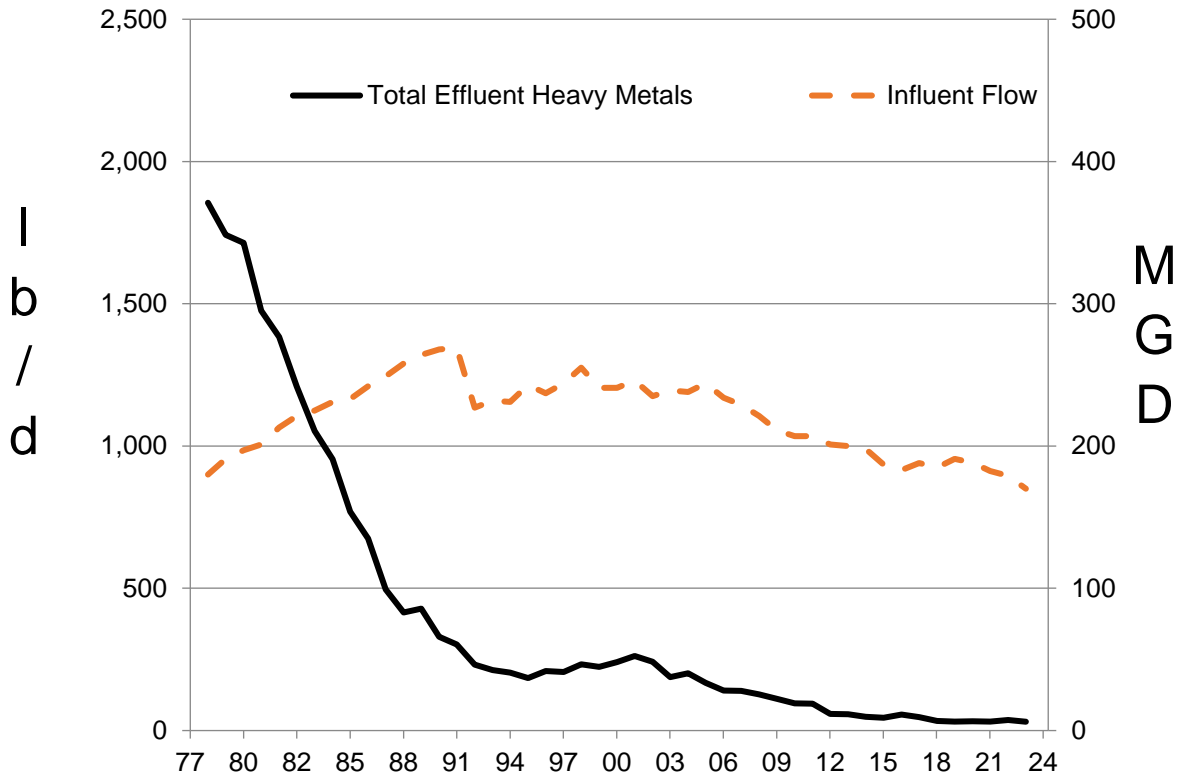
#### **E.2.1 Pretreatment Program Summary**

##### **Control of Pollutants**

Since FY 1976/77, while Orange County's population has grown, the pretreatment program has been successful in reducing the average daily pounds of metals (described below) entering OC San's system by 90% and metals discharged to the marine environment by 99%. Over this time, individual effluent metals including cadmium, chromium, copper, silver, and lead have been reduced by greater than 99%, nickel by

97%, and zinc by 97% from historical levels. Long-term trends of heavy metals in the effluent show a steady decline since FY 1977 (see Figure ES-1-1).

OC San's pretreatment program has been effective in reducing the toxic priority pollutants discharged to the sewerage system. It has also been effective in protecting the collection, treatment, and disposal facilities from incidents of Pass Through or Interference, and it has enabled OC San to meet its NPDES ocean discharge limits. The quality of OC San's influent, effluent, and biosolids are evidence of the program's progress.



**Figure ES-1-1 Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years**  
Orange County Sanitation District, Resource Protection Division

**Permits**

During FY 2022/23 OC San managed 533 active permits, of which there were 329 Class I permits, 16 Class II permits, 45 Wastehauler permits, 50 Special Purpose Discharge Permits, 20 Dry Weather Urban Runoff Diversion permits, 38 FOG (fats, oils, and grease) permits, and 35 zero-discharge certifications. This level of permit activity represents no significant change compared to the total number of active permits at the end of the previous fiscal year. Of the 329 Class I users, 192 were subject to Federal Categorical Pretreatment Standards.

**Program Costs**

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and collection of user charges. The pretreatment program operating expenditures for the fiscal year, including laboratory

analyses, totaled \$7,641,063. A total revenue of \$22,046,480.64 in sewer use charge payments was received and over \$67,325.79 in noncompliance fees and penalties including Significant Noncompliance (SNC) reporting and publication fees, were issued through the pretreatment program.

### **Inspection, Sampling, and Enforcement**

OC San performed 1,542 industrial inspections during the fiscal year, with the collection of 3,591 samples. 44 compliance inspections and 11 compliance meetings were held with significant industrial users (SIUs) to identify and assess noncompliance problems and propose long-term solutions. OC San conducted three covert downstream monitoring events. 31 SIU permittees of the 329 (9.4%) that were active in FY 2022/23 were determined to be in significant noncompliance and their names were published in the newspaper (Appendix A. Monitoring and Compliance Status Report).

### **Significant Changes in Operating the Pretreatment Program**

There were no significant changes to the OC San Pretreatment Program during FY 2022/23.

#### **E.2.2 Pretreatment Program Elements**

OC San administers several different program elements designed to meet the goal of controlling discharges from industrial sources. These have a direct influence on OC San's ability to meet federal, ocean discharge, biosolids reuse and disposal, and water reclamation requirements.

#### **Public Participation**

OC San published those industries that were in significant noncompliance in the local newspaper.

Resource Protection Division staff routinely attend outside agency/association meetings, conferences, and workshops, serve on committees, and give presentations. By working with other agencies and professional associations OC San staff are aware of developing regulation, technological innovations, and future trends that may impact that OC San and the community we serve. Please see Chapter 9 for more information.

#### **Wastehauler Program**

During FY 2022/23, 45 wastehaulers were under permit with OC San and a total of 152 trucks were used to deliver the loads to OC San. During the past fiscal year, 11.6 million gallons of waste were discharged by permitted wastehaulers at the Plant No. 1 Wastehauler Station.

#### **Total Toxic Organics Waiver Program**

Permittees that have not shown detectable levels of total toxic organics (TTOs) based on results of wastewater discharge analytical data for at least one year are eligible to waive the self-monitoring requirement if it is certified that TTOs are not present or used at the facility. For FY 2022/23 OC San granted 105 companies TTO waivers.

#### **Industrial Operations and Maintenance Improvement Program**

The ongoing trend in industrial permittee discharge violations show that most cases are due to inadequate operations and maintenance of permittee's pretreatment systems as well as operator error. This was recognized years ago, when the US EPA audit findings of 1998 recommended that OC San develop and implement an industrial operations and improvement program. In 1999/2000, OC San developed a plan that included outreach and operator training, and enforcement of requirements for operator and operations and maintenance practices that is still in effect today.

In 2019, OC San conducted a comprehensive training course for industrial wastewater treatment (pretreatment) operators currently employed by facilities holding a Class I Wastewater Discharge Permit. The course was conducted by an engineering services company (selected via bid process for a five-year contract in 2019). OC San provided this training, free of charge, to assist permittees to obtain and retain a qualified pretreatment operator and to reduce or eliminate noncompliance due to operation and maintenance and/or operator problems. The training course consisted of five 4.5-hour classes and a follow-

up wastewater audit at the operator facility to ensure proper implementation of operation and maintenance practices. Those that attended the classes, passed the exam and quizzes, and successfully fulfilled the audit requirements, received certificates of completion. This program was on hold during the COVID-19 pandemic and is under consideration to resume in the coming years.

### **Non-Industrial Source Control Program**

Recognizing a need to address discharges from sources not covered by the traditional industrial Pretreatment Program (e.g., commercial and residential sources) in preparation for the initiation of GWRS, OC San established its Non-Industrial Source Control (NISC) Program in 2004. The purpose of OC San's NISC Program is to promote and implement the application of waste management strategies and practices that reduce or eliminate the generation of wastestreams at their sources, thereby reducing the volume and toxicity of wastestreams entering OC San's sewerage system. More details are available in Chapter 9.

### **E.2.3 Compliance with NPDES Discharge Requirements**

There were no plant upsets, Interference, or Pass Through incidents attributable to industrial users in FY 2022/23.

## Chapter 1. NPDES Requirements – Pretreatment

### 1.1 Pretreatment Requirements – Compliance with National Pollutant Discharge Elimination System (NPDES) Permit Requirements

This section is a summary of the pretreatment program requirements contained in OC San's NPDES Permit No. CA0110604 Order No. R8-2021-0010 (Permit), effective August 1, 2021, jointly issued by the SARWQCB and US EPA Region IX. The requirements for the industrial pretreatment program are listed in Sections V and VII of the Permit, as well as Attachment E and Attachment H. The requirements are shown below, using the corresponding numeration found in the Permit. Each requirement is followed by a summary of the activity that has resulted in OC San's compliance with Permit requirements, or a reference may be given where additional information can be found in this annual report.

#### Section V. Performance Goals and Mass Emission Benchmarks, B. Mass Emission Benchmarks – Discharge Point 001

*The following 12-month average mass emission benchmarks for Discharge Point 001 (120" outfall) are prescribed below in Table 7. For each parameter with a mass emission benchmark, the Discharge shall report the annual mass emission and the effluent concentrations and flows used to calculate the annual mass emission in the annual pretreatment report and annual receiving water monitoring report (effluent chapter).*

*These mass emission benchmarks are not enforceable water quality-based effluent limitations. They may be re-evaluated and revised during the five-year permit term. For this Order/Permit, the mass emissions benchmarks (in metric tons per year; MT/yr) were determined based on 2015 through 2019 effluent mass emission and the Discharger's annual average influent flow of 206 MGD projected for 2025 (see section V of the fact sheet in Attachment F).*

The mass emission benchmark information is contained in Chapter 2, Table 2.7 of this annual report. Performance goal information is contained in Section 2.8 and Table 2.12 of this report.

#### Section VII. Provisions, C. Special Provisions, 6. Special Provisions for Publicly Owned Treatment Works (POTWs), b. Pretreatment

*The discharger shall implement and enforce its approved pretreatment program in accordance with federal pretreatment regulations (40 CFR § 403); pretreatment standards promulgated under CWA sections 307(b), 307(c), 307(d), and 402(b); pretreatment requirements specified under 40 CFR §122.44(j); and the requirements specified in Attachment H of this Order/Permit.*

OC San has an ongoing commitment to meet the provisions of this requirement, and all pretreatment requirements are enforced as discussed throughout this report. The Ordinance contains specific provisions to meet the provisions of this requirement.

#### Attachment E – Monitoring and Reporting Program (MRP), IV. Effluent Monitoring Requirements, C. Mass Emission Benchmarks

*Constituents that have been assigned Mass Emission Benchmarks are listed in the NPDES Order/Permit under Section V.B. The Mass Emission Benchmarks have been established for the discharge through Discharge Point 001 (120" outfall) and shall be reported in metric tons per year (MT/yr). The discharger shall monitor and report annually the mass emission rate for all constituents that have mass emission benchmarks. For each constituent, the 12-month average mass emission rate, and the effluent concentrations and flows used to calculate that mass emission rate shall be reported in the annual pretreatment report and annual receiving water monitoring report (effluent chapter).*

The mass emission benchmark information is contained in Chapter 2, Table 2.7 of this annual report.

**Attachment E – Monitoring and Reporting Program (MRP), XII. Reporting Requirements, B. Other Reports, 1. Pretreatment Report**

*By October 31st of each year, the Discharger shall submit annual pretreatment reports to the Santa Ana Water Board, the State Water Board, and USEPA, describing the Discharger's pretreatment activities over the previous OCSD fiscal year (July 1 through June 30). The annual reports shall contain, but not be limited to, the information required in the attached Pretreatment Reporting Requirements (Appendix H), or an approved revised version thereof. If the Discharger is not in compliance with any conditions or requirements of this Order/Permit, the Discharger shall include the reasons for noncompliance and shall state how and when the Discharger will comply with such conditions and requirements. Prior to the completion of the GWRS Final Expansion Project, the Discharger shall conduct an annual review of local limits under 40 CFR § 403.5(c)(1) and submit the results as part of the annual pretreatment report. Within two (2) years of the completion of the GWRS Final Expansion Project, the Discharger shall provide a written explanation of the need to revise local limits under 40 CFR § 403.5(c)(1).*

OC San was in full compliance with all conditions and requirements of the Permit. OC San has an ongoing commitment to meet the provisions of this requirement as provided in this annual report. OC San has conducted its Technical Review of Local Limits as required, and the results are shown in Chapter 6.

**Attachment H - Pretreatment**

*As described in section VII.C.6.b. of this Order/Permit, the Santa Ana Water Board and USEPA incorporates these pretreatment conditions as requirements of this Order/Permit.*

*I. General Pretreatment Requirements*

*A. The discharger shall be responsible and liable for the performance of all Control Authority pretreatment requirements contained in 40 CFR § 403, including any subsequent regulatory revisions to Part 403. Where Part 403 or subsequent revision places mandatory actions upon the Discharger as a Control Authority but does not specify a timetable for completion of the actions, the Discharger shall complete the required actions within one (1) year from the issuance date of this permit or the effective date of the Part 403 revisions, whichever comes later. For violations of pretreatment requirements, the Discharger shall be subject to enforcement actions, penalties, fines and other remedies by the USEPA or other appropriate parties, as provided in the Act. USEPA may initiate enforcement action against a nondomestic user for noncompliance with applicable standards and requirements as provided in the Act.*

*B. Prior to the completion of the GWRS Final Expansion project, the Discharger shall conduct annual Technical Review of local limits under 40 CFR § 403.5(c)(1) and submit the results as part of the annual pretreatment report. Within two (2) years of the completion of the GWRS Final Expansion project, the Discharger shall provide a written technical evaluation of the need to revise local limits under 40 CFR § 403.5(c)(1), as required in 40 CFR §122.33(j)(2)(ii).*

See response above.

*C. The Discharger shall enforce the requirements promulgated under CWA sections 307(b), 307(c), 307(d), and 402(b) with timely, appropriate and effective enforcement actions. The Discharger shall cause all nondomestic users subject to federal categorical standards to achieve compliance no later than the date specified in those requirements or, in the case of a new nondomestic user, upon commencement of the discharge.*

OC San has an ongoing commitment to meet the provisions of this requirement, and all pretreatment requirements are enforced as discussed in Chapter 4 of this report. The Ordinance contains specific provisions for new dischargers that are more stringent than those required by 40 CFR 403.



The ongoing quarterly inspection, sampling, and monitoring program for each Class I permittee (Significant Industrial User, or SIU) ensures compliance with federal, state, and local regulations. The compliance status of all permittees subject to federal categorical standards are shown in the Fiscal Year 2022/23 List of SIUs with Monitoring and Compliance Status, presented in Appendix A of this report.

*D. The Discharger shall perform the pretreatment functions as required in 40 CFR § 403 including, but not limited to:*

*1. Implement the necessary legal authorities as provided in 40 CFR § 403.8(f)(1);*

The legal authorities are contained in OC San's 1983 Ordinance which were approved by EPA in January 1984 and affirmed during the May 1986 audit. Revised ordinances were adopted and became effective September 8, 1989, February 7, 1992, July 1, 1998, July 1, 2008, October 1, 2009, July 1, 2016, and most recently on July 1, 2019.

*2. Enforce the pretreatment requirements under 40 CFR § 403.5 and 403.6;*

The requirements to enforce and implement National Pretreatment Standards for general prohibitions and specific industrial subcategories are contained in OC San's Ordinance. Chapter 4 of this report describes OC San's enforcement efforts for FY 2022/23.

*3. Implement the programmatic functions as provided in 40 CFR § 403.8(f)(2); and*

The required functions include the identification, quantification, permitting, and enforcement of the standards set forth in OC San's Ordinance. Chapter 3 and Chapter 4 of this report describe the permitting and enforcement efforts for FY 2022/23.

*4. Provide the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR § 403.8(f)(3).*

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and sewer use charges. The pretreatment program's operating expenditures for FY 2022/23, including laboratory analyses, totaled \$7,641,063. Chapter 5 of this report provides additional details.

*E. The Discharger shall submit annually a report to USEPA and the Santa Ana Water Board describing its pretreatment activities over the previous year. In the event the Discharger is not in compliance with any conditions or requirements of this Order/Permit, then the Discharger shall also include the reasons for noncompliance and state how and when the Discharger shall comply with such conditions and requirements. This annual report shall cover operations from July 1 through June 30 and is due on October 31st of each year. The report shall contain, but not be limited to, the following information:*

*1. A summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants USEPA has identified under CWA section 307(a) which are known or suspected to be discharged by nondomestic users. This will consist of an annual full priority pollutant scan, with quarterly samples analyzed only for those pollutants detected in the full scan. The Discharger is not required to sample and analyze for asbestos. Sludge sampling and analysis are covered in the sludge section of this Order/Permit. The Discharger shall also provide any influent or effluent monitoring data for nonpriority pollutants which the Discharger believes may be causing or contributing to interference or pass-through. Sampling and analysis shall be performed with the techniques prescribed in 40 CFR § 136.*

The influent, effluent, and biosolids sampling information is provided in Chapter 2, Chapter 8, and Appendix B of this annual report.

*2. A discussion of Upset, Interference, or Pass Through incidents, if any, at the treatment plant which the Discharger knows or suspects were caused by nondomestic users of the POTW system. The discussion shall include the reasons why the incidents occurred, the corrective actions taken and, if known, the name and address of the nondomestic user(s)*

*responsible. The discussion shall also include a review of the applicable pollutant limitations to determine whether any additional limitations, or changes to existing requirements, may be necessary to prevent Pass Through or Interference.*

There were no plant upsets, Interference, or Pass Through incidents attributable to industrial users in FY 2022/23.

*3. An updated list of the Discharger's significant industrial users (SIUs) including their names and addresses, and a list of deletions, additions and SIU name changes keyed to the previously submitted list. The Discharger shall provide a brief explanation for each change. The list shall identify the SIUs subject to federal categorical standards by specifying which set(s) of standards are applicable to each SIU. The list shall also indicate which SIUs are subject to local limitations.*

Appendix A of this report, the Monitoring and Compliance Status Report, provides an updated list of SIUs and identifies the local or set of categorical standards applicable to each SIU.

*4. The Discharger shall characterize the compliance status of each SIU by providing a list or table which includes the following information: Name of the SIU, category, if subject to federal categorical standards; type of wastewater treatment or control processes in place; number of samples taken by the POTW during the year; number of samples taken by the SIU during the year; for an SIU subject to discharge requirements for total toxic organics, whether all required certifications were provided; a list of the standards violated during the year, where categorical standards and/or local limits violations are identified; whether the facility is in significant noncompliance (SNC) as defined at 40 CFR § 403.8(f)(2)(viii) at any time during the year; and summary of enforcement or other actions taken during the year to return the SIU to compliance, where the type of action, final compliance date, and the amount of fines and penalties collected, if any, are described, including any proposed actions for bringing the SIU into compliance.*

This annual report contains all items listed above. SIU names, categories, number of samples and inspections, violations, and SNC status are shown in Appendix A. SIU wastewater treatment is shown in Appendix J, Total Toxic Organic waivers are shown in Chapter 6, and enforcement actions are shown in Chapter 4 and Appendix D.

*5. A brief description of any programs the POTW implements to reduce pollutants from nondomestic users that are not classified as SIUs.*

The activities for OC San's pollution prevention programs and non-industrial source control are discussed in Chapter 6 and Chapter 9.

*6. A brief description of any significant changes in operating the pretreatment program which differ from the previous year including, but not limited to, changes concerning the program's administrative structure, local limits, monitoring program or monitoring frequencies, legal authority, enforcement policy, funding levels, or staffing levels;*

There were no significant changes to the pretreatment program as shown in Chapter 6.

*7. A summary of the annual mass emission, and the effluent concentrations and flows used to calculate the annual mass emission (see section V.B. of the Order/Permit);*

A summary of the annual mass emission, and effluent concentrations and flows used to calculate annual mass emission can be found in Chapter 2 of this annual report.

*8. A summary of the annual pretreatment budget, including the cost of pretreatment program functions and equipment purchases;*

For FY 2022/23, the operating expenses for the pretreatment program totaled \$7,641,063. Additional information on pretreatment program costs and purchases are shown in Chapter 5 of this report.

*9. A summary of activities to involve and inform the public of the program including a copy of the newspaper notice, if any, required under 40 CFR § 403.8(f)(2)(viii); and*

A copy of the significant noncompliance (SNC) notice for the newspaper publication can be found in Appendix E.

*10. Results from annual Technical Review of local limits which is conducted under 40 CFR § 403.5(c)(1). See Section I.B of Attachment H.*

The results from annual Technical Review of Local Limits can be found in Chapter 6 of this annual report.

## **Chapter 2. OC San Facilities and Compliance with Discharge Requirements**

### **2.1 Introduction**

OC San is responsible for collecting, transporting, and treating wastewater, as well as reusing or disposing of treated wastewater and the separated solids in accordance with all applicable federal, state, and local laws and regulations. The following pages represent a summary of the operation of the wastewater treatment and collection facilities, historical data, and the regulatory compliance record for the period of July 1, 2022 through June 30, 2023 (FY 2022/23). OC San is also enrolled in the statewide Waste Discharge Requirements program for sanitary sewers.

OC San operates and maintains Reclamation Plant No. 1 and Treatment Plant No. 2, 389 miles of sewers, and 15 outlying pump stations. The treatment plants and pump stations are supervised, operated, and maintained by highly trained professionals with appropriate certifications from the California State Water Resources Control Board for treatment plant operators, and voluntary certifications from the California Water Environment Association.

The treated wastewater is either discharged into the Pacific Ocean in strict and consistent compliance with state and federal requirements as set forth in the Permit, or directed to the Orange County Water District (OCWD) for reclamation. Approximately 127 million gallons per day (MGD) of treated wastewater was routed to facilities operated by OCWD during FY 2022/23. The Groundwater Replenishment System (GWRS) produces purified recycled water used to recharge the Orange County Groundwater Basin and protect it from degradation due to seawater intrusion. As of December 2022, Phase III of GWRS produces 110 MGD of reclaimed water.

During FY 2022/23, OC San beneficially recycled 99% of the dewatered biosolids for use as agricultural soil amendments and compost products. Total biosolids production for this fiscal year was approximately 187,523 wet tons, a 5.5% reduction from 198,349 wet tons in 2021/22. Solids content was 24.4% for Plant No. 1 and 27.8% for Plant No. 2. Two management options (land application and composting) were utilized through five vendor contracts in two states and four counties. Grit and screenings are transported under contract for landfill disposal. Debris and grit removed from the sewer during cleaning is dried at Plant No. 1 and then hauled to landfill for disposal.

OC San's primary and secondary treatment, digestion, and dewatering facilities were all operated within their respective design capacities for the entire fiscal year.

### **2.2 Existing OC San Facilities**

OC San's operations start with the collection of wastewater from the residential, commercial, and industrial customers in 20 cities, four special districts, and portions of unincorporated Orange County. The average daily flow tributary to OC San per year since 1997 is shown in Table 2.1.

<b>Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD)</b>					
<b>Fiscal Year 1996/97-2022/23</b>					
Orange County Sanitation District, Resource Protection Division					
<b>FY</b>	<b>Influent (MGD)</b>	<b>Effluent (MGD)</b>	<b>FY</b>	<b>Influent (MGD)</b>	<b>Effluent (MGD)</b>
1997	244	242	2011	207	152
1998	255 <sup>c</sup>	255	2012	201	139
1999	241	239	2013	200	137
2000	241	236	2014	198	137
2001	246	244	2015	187	117
2002	235	231	2016	183	92
2003	239	235	2017	188	101
2004	238	238	2018	185	88
2005	244	247 <sup>b</sup>	2019	191	104
2006	234	235	2020	188	101
2007	229	232 <sup>b</sup>	2021	182	91
2008	221 <sup>a</sup>	212 <sup>d</sup>	2022	179	94
2009	211 <sup>a</sup>	167	2023	186	102
2010	207	152			

a. Decreases due to drought; less infiltration due to drier soils and business recession.

b. There was more effluent than influent due to in-plant construction and dewatering that was discharged downstream of influent metering.

c. El Niño (wet year).

d. Beginning in 2008, more influent than effluent due to Groundwater Replenishment System.

## 2.2.1 Description of Treatment Plants

Based on population served, OC San is one of the largest wastewater facilities in the United States. The network of interceptor sewers, treatment units and disposal systems are quite complex. The following sections provide an overview of the treatment facilities.

### 2.2.1.1 Reclamation Plant No. 1

Reclamation Plant No. 1 is located in the City of Fountain Valley adjacent to the Santa Ana River. The metering and diversion structure, constructed in 1974, allows the excess wastewater from any of the six trunk sewers tributary to Plant No. 1 to be diverted to Plant No. 2 to avoid overloading Plant No. 1 and to provide for maintenance and construction activities. The metering and diversion structure also contains pH, conductivity, and flow meters to monitor the incoming wastewater on each trunk sewer. The operational flexibility also allows Plant No. 1 to provide the highest quality of wastewater for reclamation at OCWD. Flows from the Santa Ana River Interceptor trunkline, which contains Santa Ana Watershed Project Authority (SAWPA) discharges, are diverted to Plant No. 2.

The wastewater flows through bar screens with 5/8-inch-wide openings where large solids (e.g., rags, non-dispersible materials, plastics, grease chunks) are removed. Wastewater is then pumped to aerated grit chambers where the velocity of the water is slowed to allow coffee grounds, seeds, sand, gravel, and other heavy particulate debris to settle out. All the screenings and grit are hauled by a contractor to a landfill for disposal. Foul air at the treatment plants is captured from the trunk sewers at the metering and diversion structure, headworks structures, and grit chambers for treatment in the odor control chemical scrubbers. Five main sewage pumps (four on-duty and one standby) lift flow to the grit chambers.

For improved performance, OC San conducts chemically enhanced primary treatment (CEPT). Ferric chloride and anionic polymer are added to the primary clarifiers to enhance settling of the organic solids. Each primary clarifier is covered to capture foul air for treatment in scrubbers. Plant No. 1 has a primary treatment capacity of 204 MGD.

During FY 2022/23, 100% of the Plant No. 1 primary effluent received secondary (biological) treatment either in a conventional air activated sludge secondary treatment process or in trickling filters. An average of 127 MGD of the secondary treated water was pumped to OCWD's GWRS and the Green Acres Project (GAP) for advanced tertiary treatment. Advanced tertiary treatment prepares the water for injection into the groundwater as a barrier against saltwater intrusion, and for percolation to the aquifer for water reclamation and reuse. OCWD also provides GAP water for industrial uses to OC San. The balance of the Plant No. 1 secondary effluent flows by gravity to Plant No. 2 where it is blended with treated wastewater from Plant No. 2 prior to pumping and ocean discharge.

Solids collected in the primary and secondary clarifiers are pumped to anaerobic digesters for organic waste stabilization and pathogen destruction at 98 degrees Fahrenheit (°F). Following digestion, the sludge is dewatered using a centrifuge process. The centrifuge-dewatered biosolids are removed by private contractors. Stabilization results in the production of digester gas, a fuel which is approximately 63% methane and 36% carbon dioxide. This fuel has a heating value of about 619 British thermal units per cubic foot (BTU/cu. ft.). The primary and secondary sludge is blended and thickened in the thickening centrifuge units prior to digestion. Digester gas is collected, compressed, cleaned, and distributed to the Central Power Generation System (CGS) at each plant as a renewable fuel for energy generation.

In a typical year at Plant No. 1, natural gas and digester gas fuel three internal combustion engines that power 2,500 kilowatt (kW) electric generators. From October through May only two of the three engine generators operate at one time to meet air quality permit limits. During summer months (June – September), the plant's power balance is supported by 2 engines operating during peak hours and battery back-up. Three engines online can only be run during certain contractual agreement. Supplemental power was purchased from Southern California Edison (SCE) to provide for the remainder of the Plant No. 1 energy demand. The internal combustion engines were fueled primarily with digester gas with a small amount (approximately 5-10%) of purchased natural gas added to aid combustion.

#### **2.2.1.2 Treatment Plant No. 2**

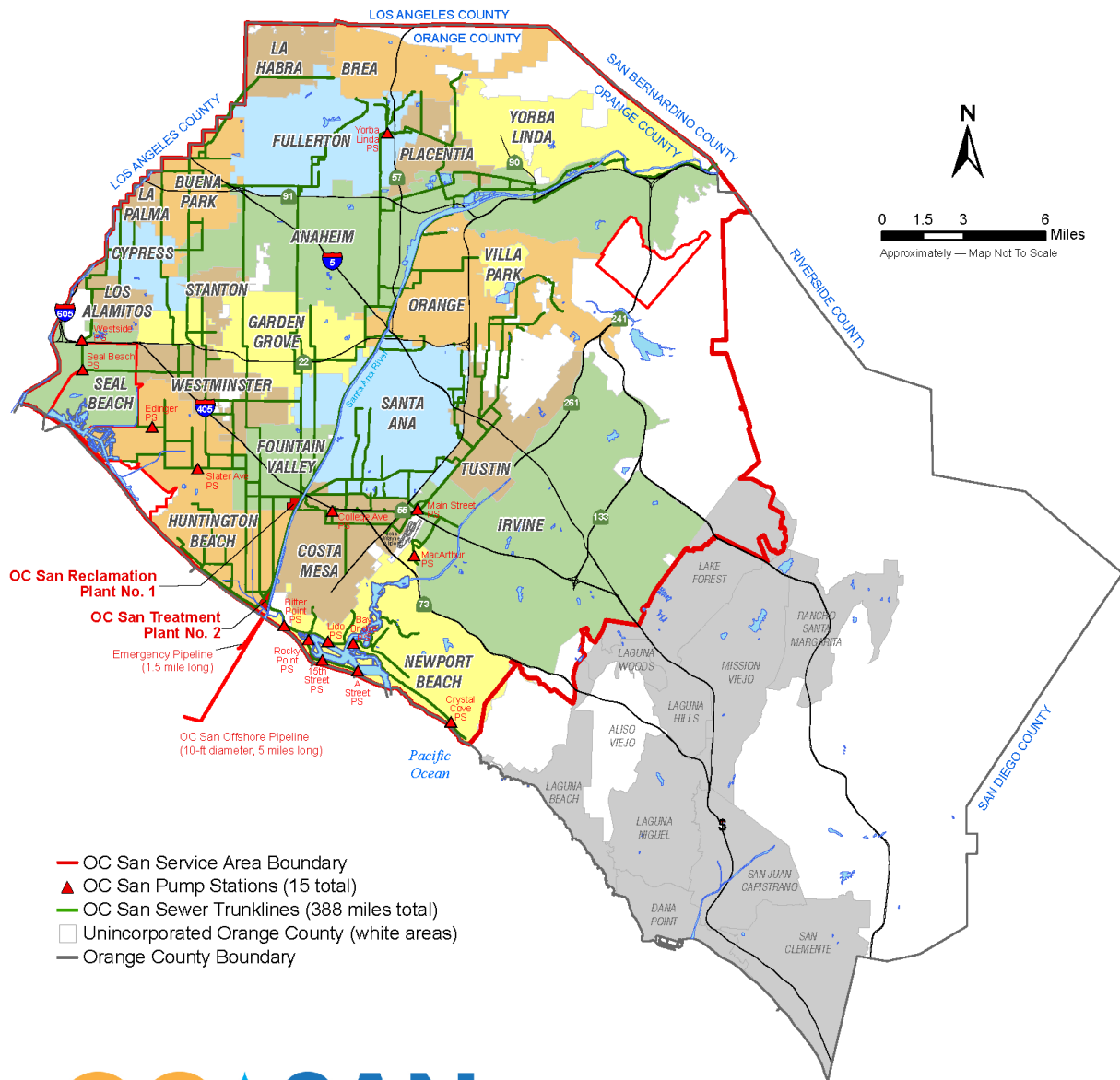
Treatment Plant No. 2 is located in the City of Huntington Beach near the mouth of the Santa Ana River. Five trunk sewers transport wastewater into Headworks D facility, which contains pH, conductivity, and flow meters, along with six mechanically-cleaned bar screens, seven main sewage pumps, and six grit tanks. All screenings and grit are hauled by a private contractor to a landfill for disposal. The foul air from the headworks, grit tanks, and primary sedimentation basins is collected for treatment in a combination of chemical scrubbers and bio-towers.

Ferric chloride and anionic polymer are used to enhance the settling of solids during primary treatment. Settleable and suspended solids, and floatable particulates are removed from the wastewater in primary sedimentation basins and pumped to anaerobic digesters for stabilization. Plant No. 2 primary effluent receives 100% secondary treatment in either an oxygen activated sludge process or trickling filters.

Sludge from the primary and secondary settling basins is treated in anaerobic digesters. Secondary sludge is thickened in Dissolved Air Flotation (DAF) units prior to digestion. Following digestion, the sludge is dewatered using a dewatering centrifuge process. The centrifuge-dewatered biosolids are removed by private contractors.

The Plant No. 2 Central Power Generation System has five internal combustion engines that power five 3,000 kW electric generators and a 1,000-kW steam turbine powered by engine exhaust waste heat. During summer months (June – September), three engines operate during peak hours on weekdays and 2 engines are operate during weekends and on holidays. At all other times, 2 engines are running unless 3 are required to consume excess digester gas. During periods of lower demand, excess power is sold to SCE, and imported during periods of high demand. The internal combustion engines are fueled primarily with digester gas with a small amount (approximately 5-10%) of natural gas.

# Orange County Sanitation District Service Area and Treatment Plant Locations in Orange County, California



SOURCE: OC San GIS Data, Rand McNally - Thomas Brothers  
REVISED: December 2022

**Figure 2-1** Map of Orange County Sanitation District's Service Area  
Orange County Sanitation District, Resource Protection Division

### **2.2.1.3 Joint Works Facilities**

Facilities common to both plants are designated as Joint Works Facilities. These include the bypass sewer to divert wastewater from Plant No. 1 to Plant No. 2, effluent lines to convey treated wastewater from Plant No. 1 to Plant No. 2 for ocean discharge, a fiber optic cable line for interplant communication, digester gas transmission and storage line, two outfall pumping stations, two ocean outfalls (designated in the NPDES permit as Discharge Points 001 and 002), and the emergency gravity overflow flap gate valves into the Santa Ana River (Discharge Point 003).

Treated secondary effluent from Plants Nos. 1 and 2 is pumped to OC San's main discharge point, the 120-inch diameter, 5-mile long ocean outfall (the last mile of which is a diffuser with 503 ports that provides a minimum dilution of 181:1). During FY 2022/23 all influent received secondary treatment.

### **2.3 Compliance with National Pollutant Discharge Elimination System (NPDES) Requirements**

This section provides a summary of limitations in OC San's NPDES permit (Order No. R8-2021-0010, NPDES Permit No. CA0110604, effective on August 1, 2021). Table 2.2 shows NPDES Permit discharge requirements and OC San's annual average influent and final effluent discharge values for this reporting period.



**Table 2.2 NPDES Permit Discharge Requirements and OC San's Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2022/23**  
Orange County Sanitation District, Resource Protection Division

Constituent	OC San's Combined Influent Annual Average	NPDES Permit Discharge Requirement			Final Effluent Annual Average <sup>A</sup>	OC San's Compliance with NPDES Permit Limits
		30-Day Average	7-Day Average	Instantaneous Maximum		
Flow (MGD)	186	--	--	--	95	NA
BOD-C (mg/L)	231 <sup>E</sup>	25	40	--	9.7	Yes
BOD-C (lb/d)	--	42,951	68,722	--	7,743	Yes
BOD-C (percent removal)	--	>85 <sup>B</sup>	--	--	97.8	Yes
Suspended solids (mg/L)	290 <sup>E</sup>	30	45	--	6.6	Yes
Suspended solids (lb/d)	--	51,541	77,312	--	5,550	Yes
TSS (percent removal)	--	>85 <sup>B</sup>	--	--	98.8	Yes
Grease and oil (mg/L)	--	25	40	75	1.2	Yes
Grease and oil (lb/d)	--	42,951	68,722	128,853	1,014	Yes
Settleable solids (mL/L)	--	1.0	1.5	3.0	ND	Yes
Toxicity (acute)	--	--	--	Pass/Fail	Pass	Yes
Toxicity (chronic)	--	--	--	Pass/Fail	Pass	Yes
Turbidity (NTU)	--	75	100	225	3.4	Yes
pH	7.5 (P1), 7.9 (P2)	6.0 to 9.0	6.0 to 9.0	9.0	7.5	Yes
Total Chlorine Residual (mg/L)	--	0.36 <sup>C</sup>	--	10.86; D <sub>max</sub> = 1.45	0.06 <sup>C</sup>	Yes
Total Chlorine Residual (lb/d)	--	618 <sup>C</sup>	--	18,658; D <sub>max</sub> = 2,491	42 <sup>C</sup>	Yes
Benzidine (µg/L)	ND	0.0125	--	--	ND	Yes
Benzidine (lb/d)	--	0.0215	--	--	--	Yes
Hexachlorobenzene (µg/L)	ND	0.0380	--	--	ND	Yes
Hexachlorobenzene (lb/d)	--	0.0653	--	--	--	Yes
PCBs (µg/L)	ND	0.0034	--	--	ND	Yes
PCBs (lb/d)	--	0.0058	--	--	--	Yes
TCDD equivalents (pg/L)	NR	0.7059	--	--	ND	Yes
TCDD equivalents (lb/d) <sup>D</sup>	--	0.0000012	--	--	--	Yes
Toxaphene (µg/L)	NR	0.0380	--	--	ND	Yes
Toxaphene (lb/d)	--	0.0653	--	--	--	Yes

Final effluent was compliant with NPDES permit limitations. Additional influent/effluent data is shown in Appendix B

-- Not determined

<sup>A</sup> Based on the average of the values reported to the California Integrated Water Quality System Project (CIWQS) in the Electronic Self-Monitoring Report (eSMR).

<sup>B</sup> Monthly average minimum

<sup>C</sup> 6-month median

<sup>D</sup> lb/d = pounds per day

<sup>E</sup> Weighted average based on respective influent flow quantities

ND Not detected

NR Not required. The NPDES permit requires monitoring and analysis of TCDD equivalents in effluent only.

NA Not applicable

## 2.4 Effluent Characteristics

### 2.4.1 General

The OC San NPDES permit establishes water quality effluent constituent compliance limits for relevant wastewater parameters and toxic materials. The following sections represent a review of the current and historical compliance status for the relevant wastewater parameters. OC San's annual average daily influent and final effluent for suspended solids and carbonaceous BOD (BOD-C) for the past five fiscal years are shown in Table 2.3.

### 2.4.2 Suspended Solids

During FY 2022/23, the suspended solids discharge was in compliance with Permit effluent limits. The final effluent monthly average suspended solids concentration of 6.6 milligrams per liter (mg/L) for a monthly average discharge mass emissions rate of 5,542 pounds per day (lb/d) during FY 2022/23 is 22% of the allowable 30-day average concentration limit of 30 mg/L, and 10.8% of the mass emissions limit of 51,541 lb/d. A summary of the suspended solids data for the past five years is shown in Table 2.3.

### 2.4.3 Carbonaceous Biochemical Oxygen Demand (BOD-C)

The current 30-day average discharge permit limit for carbonaceous BOD is 25 mg/L. The discharge was in compliance for FY 2022/23. The final effluent 30-day average for FY 2022/23 was 9.7 mg/L with a removal rate of 96%. A summary of the carbonaceous BOD data for the past five years is shown in Table 2.3.

<b>Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2018/19 – 2022/23</b> Orange County Sanitation District, Resource Protection Division								
FY	Suspended Solids				BOD-C			
	Influent		Effluent		Influent		Effluent	
	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d
2018/19	382	611,700	5.7	4,990	214	342,700	4.8	4,200
2019/20	327	512,700	5.3	4,583	209	327,700	5.4	4,435
2020/21	315	478,130	5.4	4,116	211	320,270	6.4	4,858
2021/22	332	503,930	5.8	4,566	205	311,160	9.3	6,778
2022/23	290	450,151	6.6	5,618	231	358,568	9.7	8,257

### 2.4.4 Oil and Grease

The 30-day effluent limit for oil and grease is 25 mg/L and 42,951 lb/d. Average oil and grease was measured at 1.2 mg/L in the treated effluent during this fiscal year.

### 2.4.5 Settleable Solids

The 30-day average limit for settleable solids is 1.0 milliliter per liter (mL/L) with a maximum at any time of 3.0 mL/L. The FY 2022/23 average for settleable solids was non-detectable. A summary of the annual average settleable solids data for the past five years is shown in Table 2.4.

### 2.4.6 Turbidity

Turbidity is a measurement of the microscopic, suspended solids or finely divided silty particles in water discharged to the ocean. The compliance limit for turbidity is 75 nephelometric turbidity units (NTU) based on a 30-day average. The FY 2022/23 average turbidity was 3.4 NTU. A summary of the turbidity data for the past five years is shown in Table 2.4.

#### 2.4.7 pH

Pursuant to the Permit, the pH of the ocean discharge shall neither exceed 9.0 nor be less than 6.0. The final effluent was in compliance throughout FY 2022/23. The annual average pH was 7.5, which is well within the pH effluent limits. The ocean discharge pH has remained relatively constant over the past five years, as summarized in Table 2.4.

<b>Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2018/19-2022/23</b> Orange County Sanitation District, Resource Protection Division			
<b>FY</b>	<b>Settleable Solids (mL/L)</b>	<b>Turbidity (NTU)</b>	<b>pH</b>
2018/19	ND	2.5	8.0
2019/20	ND	2.4	8.1
2020/21	ND	3.0	8.1
2021/22	ND	2.6	7.5
2022/23	ND	3.4	7.5

#### 2.4.8 Toxicity

OC San's NPDES permit requires that the final effluent be tested once per month for chronic toxicity, and quarterly for acute toxicity. Results of acute and chronic tests are reported as either a "Pass" or "Fail" following the Test of Significant Toxicity (TST) hypothesis testing approach described in the National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document (USEPA 833-R-10-003, 2010).

Every calendar year the effluent must be tested using each of the species listed in the NPDES permit to determine which species is most sensitive to the effluent. The most sensitive test species is then used as the test organism for monthly and quarterly testing. In September 2022, acute toxicity tests were performed with Topsmelt (*Atherinops affinis*) and the mysid crustacean (*Americamysis bahia*) to determine the most sensitive acute test species. There were no observed effects for both species. As such, all FY 2022/23 quarterly tests continued to be performed with *Atherinops affinis* as the most sensitive test species.

In October 2022, chronic toxicity tests were performed with giant kelp (*Macrocystis pyrifera*), purple sea urchin (*Strongylocentrotus purpuratus*), and Topsmelt (*Atherinops affinis*) to determine the most sensitive chronic test species. The results demonstrated that giant kelp was the most sensitive species for the chronic test. FY 2022/23 monthly chronic testing was conducted using *S. purpuratus* from July 2022 to October 2022 and *M. pyrifera* from November 2022 to June 2023.

Table 2.5 summarizes the toxicity testing results for FY 2018/19 through FY 2022/23. All FY 2022/23 acute (n=4 tests) and chronic (n=12) toxicity tests passed the TST, indicating no observable final effluent toxicity.

<b>Table 2.5 Final Effluent Yearly Toxicity Results for Fiscal Years 2018/19-2022/23</b> Orange County Sanitation District, Resource Protection Division		
<b>FY</b>	<b>Test Species</b>	<b>Summary of Toxicity Results</b>
2018/19	Acute ( <i>A. affinis</i> )	Pass
	Chronic ( <i>S. purpuratus</i> )	Pass
2019/20	Acute ( <i>A. affinis</i> )	Pass
	Chronic ( <i>S. purpuratus</i> )	Pass
2020/21	Acute ( <i>A. affinis</i> )	Pass
	Chronic ( <i>S. purpuratus</i> )	Pass
2021/22	Acute ( <i>A. affinis</i> )	Pass
	Chronic ( <i>S. purpuratus</i> )	Pass
2022/23 <sup>(1)</sup>	Acute ( <i>A. affinis</i> )	Pass
	Chronic ( <i>S. purpuratus</i> & <i>M. pyrifer</i> )	Pass

<sup>(1)</sup> FY 2022/23 monthly chronic testing was conducted using *S. purpuratus* from July 2022 to October 2022 and *M. pyrifer* from November 2022 to June 2023.

## **2.5 Facilities Special Projects**

### **2.5.1 Plant No. 1 Headworks Rehabilitation**

Construction for Project No. P1-105 will rehabilitate and upgrade Plant No. 1 Headworks. New structures to be constructed as part of this project include Grit Pump Station, Grit Handling Building, Headworks Odor Control Facility, Electrical Buildings, and other support systems.

### **2.5.2 Plant No. 2 TPAD Digester Facility**

The project will enhance the existing anaerobic digesters at Plant No. 2 with a temperature-phased anaerobic digester (TPAD) configuration under Project No. P2-128. This project will build five new thermophilic digesters; Class A batch tanks; sludge heating and cooling facilities; associated sludge pumping; digester mixing; gas conveyance and cooling facilities; odor control; power distribution; and controls. Replacement and demolition of existing digesters will be included in a separate project. The project P2-128A will construct a perimeter wall along the southern plant boundary to provide site security and flood protection.

### **2.5.3 Plant No. 2 Return Activated Sludge Piping Replacement**

Return Activated Sludge (RAS) piping will be replaced at the Plant No. 2 Oxygen Activated Sludge Plant from the secondary clarifiers to the RAS pumps under Project No. P2-123. Area lights will also be replaced, and concrete cracks and the spalling on the east aeration basin decks will also be fixed.

### **2.5.4 Plant No. 2 Outfall Low Flow Pump Station**

The Trickling Filter Solids Contact/Sludge Reaeration (SC/SR) process will treat the additional reclaimable flows to be sent to OCWD to support the GWRS Final Expansion. Once completed, the Outfall Low Flow Pump Station under Project No. J-117B will convey the reduced daily flows to the ocean outfall. The Ocean Outfall Booster Station (OOBS) will be rehabilitated to adapt to change in daily flow. A new Plant Water Pump Station (PWPS) will also be constructed to draw secondary effluent from the Trickling Filter Solids Contact (TFSC) process.

## **2.6 Metals**

The concentrations of seven metals (cadmium, chromium, copper, lead, nickel, silver, and zinc) are monitored monthly by OC San. The results of these analyses are used to evaluate efficiencies, trend inputs from discrete sources, and potential toxicity concentrations in the secondary facilities, anaerobic digesters, and dewatered sludges.

The average metal concentrations in OC San’s influent and effluent for the last five years are shown in Table 2.6.

<b>Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2018/19-2022/23</b> Orange County Sanitation District, Resource Protection Division											
Constituent	INFLUENT					EFFLUENT					
	18-19	19-20	20-21	21-22	22-23	18-19	19-20	20-21	21-22	22-23	
Cadmium	2	1	0.6	0.6	0.7	ND	0.02	ND	ND	0.3	
Chromium	12	11	10	9	7.4	0.7	0.9	1	1.4	0.8	
Copper	165	149	120	105	108	3	4	4	5.3	4.1	
Lead	4	4	4	3.2	2.9	0.05	0.4	0.4	0.4	0.1	
Nickel	16	15	16	12.8	10.7	7	7	7	8	6	
Silver	2	1	1	1	1	ND	ND	ND	ND	ND	
Zinc	274	248	221	215	199	20	21	21	22	20	
Total Avg	476	429	372	346	330	32	33	32	37	31	
ND	Non-detect										
2018-19	Influent mass based on 191 MGD					2018-19	Effluent mass based on 104 MGD				
2019-20	Influent mass based on 188 MGD					2019-20	Effluent mass based on 101 MGD				
2020-21	Influent mass based on 182 MGD					2020-21	Effluent mass based on 91 MGD				
2021-22	Influent mass based on 179 MGD					2021-22	Effluent mass based on 94 MGD				
2022-23	Influent mass based on 186 MGD					2022-23	Effluent mass based on 102 MGD				

## 2.7 Mass Emission Benchmarks

OC San’s Permit contains mass emission benchmarks for 81 constituents as identified in Section V, B, Table 7 of Order R8-2021-0010. These mass emission benchmarks are not water-quality based effluent limits; however, OC San will use this information as part of its annual review of local limits.

The mass emission benchmarks report is required to compare each constituent’s sample result with the minimum level (ML) for that constituent in the Permit. According to Permit requirement, sample results that are less than the reported ML but greater than the method detection limit (MDL) are to be reported as zero prior to calculating the 12-month constituent average. Some of the values in the Mass Emission Benchmarks Report differ from those found in the Priority Pollutants Report, since the former relies on the ML as the threshold of detection, while the latter uses the MDL as the threshold for reporting.

As shown in Table 2.7, most of the heavy metal results fell in the range of 0.0% to 50% of their respective benchmarks. Unlike many of the benchmarked organic constituents, OC San had extensive historic heavy metals sampling frequencies and detectable levels on which to base its benchmarks. As a result, the heavy metal data has less statistical variance from the established benchmarks. With continuing improvements in the pretreatment program, the heavy metals benchmark results verify the decreasing mass emission trends, since constituents are less than their historic values. Heavy metals are covered under existing local pretreatment limits. The local limits for those constituents were evaluated as part of the revised Ordinance and local limits effective on July 1, 2016.

As shown in Table 2.7, most of the organic compounds with benchmarks were rarely detected in the effluent. More than half of the 81 constituents were not detected in OC San’s effluent and are listed as zero (0) metric tons per year emitted, and zero percent of the benchmark. Only 17 of 81 constituents exceeded 10% of their respective benchmarks. It’s worth noting that, historically, these constituents were rarely detected in OC San’s effluent, so the benchmarks could only be based on the MDL. As OC San continues to increase the sensitivity of its detection limits, some constituents may be more discernable in the future. That is, as detection limits are lowered, there will likely be fewer zero-tons-emitted constituents in OC San’s list of benchmarks.

**Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2022/23**  
Orange County Sanitation District, Resource Protection Division

Constituent	2022-23 12-Mo. Avg Benchmark	2022-23 12-Mo. Avg Actual	2022-23 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year <sup>A</sup>	MT/Year <sup>A</sup>	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
<b>Marine Aquatic Life Toxicants</b>									
Arsenic, total recoverable	1.88	0.403	21.44	0.334087	0.484890	12	12	104.66	2.99
Cadmium, total recoverable	0.07	0.004	5.71	0.000000	0.021681	12	3	104.66	0.04
Chromium (VI)	0.44	0.138	31.36	0.103065	0.182118	14	14	106.32	0.98
Copper, total recoverable	5.21	0.778	14.93	0.351698	2.160867	12	12	104.66	5.12
Lead, total recoverable	0.18	0.019	10.56	0.000000	0.034616	12	10	104.66	0.14
Mercury, total recoverable	0.002	0.001	50	0.000256	0.001242	12	12	104.66	0.0044
Nickel, total recoverable	6.69	1.005	15.02	0.713952	1.246827	12	12	104.66	7.38
Selenium, total recoverable	6.23	1.44	23.11	1.176673	1.931697	12	12	104.66	10.66
Silver, total recoverable	0.05	0	0	0.000000	0.000000	12	0	104.66	0
Zinc, total recoverable	13.09	3.462	26.45	2.114889	5.096522	12	12	104.66	24.92
Cyanide, total recoverable	1.67	0.532	31.86	0.000000	0.971524	15	13	104.50	3.60
Ammonia as nitrogen	10457.00	3754.213	35.9	3245.100517	4875.104123	365	365	94.98	30074.35
Total chlorine residual	38.09	8.978	23.57	5.594050	11.432750	1098	951	94.95	73.24
Non-chlorinated phenols	0.44	0.005	1.14	0.000000	0.021250	12	3	103.87	0.04
Chlorinated phenols	0.15	0.034	22.67	0.000000	0.109391	12	5	103.87	0.28
Endosulfan	0.003	0	0	0.000000	0.000000	2	0	77.83	0
Endrin	0.006	0	0	0.000000	0.000000	2	0	77.83	0
Hexachlorocyclohexane (HCH)	0.003	0	0	0.000000	0.000000	2	0	77.83	0
Radioactivity	-	-	-	-	-	-	-	-	-
<b>Human Health Toxicants – Non-Carcinogens</b>									
Acrolein	3.03	0	0	0.000000	0.000000	4	0	113.60	0
Antimony	0.72	0.167	23.19	0.133462	0.228061	12	12	104.66	1.24
Bis(2-chloroethoxy) methane	3.03	0	0	0.000000	0.000000	12	0	103.87	0
Bis(2-chloroiso-propyl) ether	1.21	0	0	0.000000	0.000000	12	0	103.87	0
Chlorobenzene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Chromium (III)	0.44	0.138	31.36	0.103065	0.182118	14	14	106.32	0.98
Di-n-butyl-phthalate	0.51	0.013	2.55	0.000000	0.052232	12	3	103.87	0.11
Dichlorobenzenes	0.61	0	0	0.000000	0.000000	4	0	113.60	0
Diethyl phthalate	0.22	0.098	44.55	0.000000	0.770728	12	4	103.87	0.750
Dimethyl phthalate	1.21	0	0	0.000000	0.000000	12	0	103.87	0
4,6-dinitro-2-methylphenol	3.03	0	0	0.000000	0.000000	12	0	103.87	0
2,4-dinitrophenol	3.03	0	0	0.000000	0.000000	12	0	103.87	0
Ethylbenzene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Fluoranthene	0.61	0	0	0.000000	0.000000	12	0	103.87	0
Hexachlorocyclopentadiene	3.03	0	0	0.000000	0.000000	12	0	103.87	0
Nitrobenzene	3.03	0	0	0.000000	0.000000	12	0	103.87	0

**Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2022/23**  
Orange County Sanitation District, Resource Protection Division

Constituent	2022-23 12-Mo. Avg Benchmark	2022-23 12-Mo. Avg Actual	2022-23 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year <sup>A</sup>	MT/Year <sup>A</sup>	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Thallium	0.06	0	0	0.000000	0.000000	12	0	104.66	0
Toluene	0.05	0	0	0.000000	0.000000	4	0	113.60	0
Tributyltin	0.07	0	0	0.000000	0.000000	4	0	106.77	0
1,1,1-trichloroethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
<b>Human Health Toxicants – Carcinogens</b>									
Acrylonitrile	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Aldrin	0.0010	0	0	0.000000	0.000000	2	0	77.83	0
Benzene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Benzidine	0.004	0	0	0.000000	0.000000	12	0	103.87	0
Beryllium	0.30	0	0	0.000000	0.000000	12	0	104.66	0
Bis(2-chloroethyl) ether	0.61	0	0	0.000000	0.000000	12	0	103.87	0
Bis(2-ethylhexyl) phthalate	1.11	0.035	3.15	0.000000	0.121949	12	4	103.87	0.27
Carbon tetrachloride	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Chlordane	0.0010	0	0	0.000000	0.000000	2	0	77.83	0
Chlorodibromomethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Chloroform	4.72	0.455	9.64	0.000000	0.754250	4	3	113.60	3.49
DDT	0.003	0	0	0.000000	0.000000	2	0	77.83	0
1,4-dichlorobenzene	0.12	0	0	0.000000	0.000000	4	0	113.60	0
3,3'-dichlorobenzidine	0.42	0	0	0.000000	0.000000	12	0	103.87	0
1,2-dichloroethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
1,1-dichloroethylene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Dichlorobromomethane	2.56	0	0	0.000000	0.000000	4	0	113.60	0
Dichloromethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
1,3-dichloropropene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Dieldrin	0.002	0	0	0.000000	0.000000	2	0	77.83	0
2,4-dinitrotoluene	3.03	0	0	0.000000	0.000000	12	0	103.870	0
1,2-diphenylhydrazine	0.61	0	0	0.000000	0.000000	12	0	103.87	0
Halomethanes	0.12	0.018	15	0.000000	0.042559	4	3	113.60	0.13
Heptachlor	0.003	0	0	0.000000	0.000000	2	0	77.83	0
Heptachlor epoxide	0.003	0	0	0.000000	0.000000	2	0	77.83	0
Hexachlorobenzene	0.010	0	0	0.000000	0.000000	12	0	103.87	0
Hexachlorobutadiene	0.610	0	0	0.000000	0.000000	12	0	103.87	0
Hexachloroethane	0.610	0	0	0.000000	0.000000	12	0	103.87	0
Isophorone	0.610	0	0	0.000000	0.000000	12	0	103.87	0
N-nitrosodimethylamine	3.03	0	0	0.000000	0.000000	12	0	103.87	0
N-nitrosodi-n-propylamine	3.03	0	0	0.000000	0.000000	12	0	103.87	0
N-nitrosodiphenylamine	0.610	0	0	0.000000	0.000000	12	0	103.87	0
PAHs	0.610	0	0	0.000000	0.000000	12	0	103.87	0

**Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2022/23**  
 Orange County Sanitation District, Resource Protection Division

Constituent	2022-23 12-Mo. Avg Benchmark	2022-23 12-Mo. Avg Actual	2022-23 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year <sup>A</sup>	MT/Year <sup>A</sup>	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
PCBs	0.0010	0	0	0.000000	0.000000	2	0	77.83	0
TCDD equivalents	0.000000201	0	0	0.000000	0.000000	4	0	110.10	0
1,1,2,2-tetrachloroethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
Tetrachloroethylene	0.450	0	0	0.000000	0.000000	4	0	113.60	0
Toxaphene	0.010	0	0	0.000000	0.000000	2	0	77.83	0
Trichloroethylene	1.21	0	0	0.000000	0.000000	4	0	113.60	0
1,1,2-trichloroethane	1.21	0	0	0.000000	0.000000	4	0	113.60	0
2,4,6-trichlorophenol	0.15	0.016	10.67	0.000000	0.073305	12	4	103.87	0.11
Vinyl chloride	1.21	0	0	0.000000	0.000000	4	0	113.60	0

<sup>A</sup> Metric Tons



## 2.8 Performance Goals

### 2.8.1 Background

OC San's NPDES Permit (NPDES No. CA0110604, Order No. R8-2021-0010) was renewed and became effective August 1, 2021. Performance goals were added to the Permit for Discharge Point 001 (Section V, B, Table 7 of Permit) and were developed based upon actual performance data from OC San's treatment plants during the final five years of the prior NPDES permit cycle. Performance goals are used as an indication of the efficiency of the treatment systems and are not enforceable effluent limitations or standards for the regulation of discharge from the treatment facility. The Permit states that performance goals are "*intended to minimize pollutant loading (primarily for toxics), while maintaining the incentive for future voluntary improvement of water quality whenever feasible, without the imposition of more stringent limits based on improved performance.*"

OC San is required to monitor effluent data for performance goal exceedances. If there are two consecutive exceedances of the performance goals, OC San shall initiate an investigation into the cause of the exceedance. If the exceedance continues for three consecutive monitoring periods, OC San is required to submit a written report to the SARWQCB and USEPA on the nature of the exceedance, the results of the investigation, and cause of the exceedance.

Since the Permit went into effect on August 1, 2021, there were three constituents that incurred concentration performance goal exceedances over two or more consecutive months. Table 2.8 summarizes status of the investigations into the causes of these exceedances with additional detail on each situation provided in the sections below.

<b>Table 2.8 Parameters with Two or More Consecutive Monthly Exceedances of their Performance Goals</b> Orange County Sanitation District, Resource Protection Division	
<b>Parameter</b>	<b>Status of Investigation</b>
Total Chromium	Draft report submitted to the Regional Board
Total Cyanide	Investigation in progress
Chlorinated Phenols	Investigation in progress

### 2.8.2 Total Chromium

On November 1, 2021, OC San commenced investigating cause(s) of the first two consecutive chromium exceedances. OC San confirmed that these samples were only analyzed for total chromium, which has the same 1.55 µg/L performance goal as each of the individual constituents that make up total chromium: hexavalent chromium, Cr(VI) and trivalent chromium, Cr(III) (Table 2.9). When comparing equivalent mass emission rates against the chromium mass emission benchmarks (0.44 metric tons per year [MT/yr] on a 12-month average basis for both Cr(III) and Cr(VI), OC San determined that the monthly performance goal concentrations were below an equivalent 12-month maximum average concentration (~3.48 µg/L) required to remain below the mass emission benchmarks. OC San also noted that the measured total chromium effluent concentrations remained at or below the water quality objectives for Cr(III) at 190,000 µg/L. However, each detection was above 2 µg/L, which is the water quality for Cr(VI).

<b>Table 2.9 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Three Consecutive Monthly Exceedances</b> Orange County Sanitation District, Resource Protection Division							
<b>Parameter</b>	<b>Performance Goal</b>	<b>First Exceedance</b>		<b>Second Exceedance</b>		<b>Third Exceedance</b>	
Total Chromium	1.55 µg/L	September 2021	3.76 µg/L	October 2021	4.29 µg/L	November 2021	2.68 µg/L

<sup>(1)</sup> The discharger may at its option meet both the chromium III and the chromium VI performance goals or mass emission benchmarks by analyzing for total recoverable chromium (2021 NPDES Permit).

Based on the approval from EPA and SARWQCB, in May 2022 OC San initiated a year-long special project to determine whether its effluent total chromium concentrations are originating from Cr(VI) and/or Cr(III) by analyzing for each individual species in the monthly final effluent sample. After the year-long investigation, it was determined that the measured total chromium each month was entirely attributed to Cr(III). OC San provided the final speciation results to SARWQCB and EPA during the May 9, 2023 NPDES Regulatory Semi-Annual Management Meeting. There have been no further exceedances following these initial consecutive exceedance events from September to November 2021.

### 2.8.3 Total Cyanide

There were two consecutive exceedances of the performance goal for total cyanide, as follows (Table 2.10).

<b>Table 2.10 Performance Goals - Parameters with Two Consecutive Monthly Exceedances</b> Orange County Sanitation District, Resource Protection Division					
<b>Parameter</b>	<b>Performance Goal</b>	<b>First Exceedance</b>		<b>Second Exceedance</b>	
Total Cyanide	5.88 µg/L	September 2021	6.95 µg/L	October 2021	6.08 µg/L

Starting September 2021, OC San conducted a series of investigations to determine the cause(s) of the Total Cyanide performance goal exceedances. Investigations included examining historical data, conducting literature research, evaluating the three contributing process streams to OC San's final effluent, and conducting a controlled lab experiment. Based on the findings, OC San attributes the most likely cause of the performance goal exceedances to matrix interferences from the GWRS' reverse osmosis concentrate (ROC) process stream which is one of the three contributing streams to OC San's final effluent.

Sodium hydroxide (NaOH) is used to preserve effluent samples for cyanide analysis. It was determined that GWRS's ROC contains chloramine, which can react with sample matrices in the presence of NaOH to create cyanide signals. This phenomenon was reported in literature and by other wastewater agencies who later obtained regulatory approval to modify their sample preservation processes to reduce the potential matrix interferences.

To further evaluate this phenomena, OC San conducted a lab experiment, which showed that the effluent and ROC samples (analyzed without NaOH preservation or after dechlorination) yielded much lower (up to 10-fold) Total Cyanide results compared to samples that were preserved with NaOH. Although the lab experimental findings further supported that NaOH preservation of chlorinated wastewater creates Total Cyanide signals, data seems to suggest this matrix interference is sporadic, as there has not been any additional performance goal exceedances since October 2021. This sporadic occurrence could be due to 1) chloramine forming during chlorination at the beginning of the treatment train and/or 2) potentially varying degrees of decreases in chloramine concentrations along the treatment train resulting in variable concentrations of chloramine in ROC. Notably, ROC is currently a minor contributing stream (i.e., approximately 18 percent) to OC San's final effluent. However, it is possible that the matrix interferences will be intensified once ROC becomes a larger contributor to OC San's final effluent upon completion of GWRS Final Expansion. As such, OC San is currently considering two options to reduce matrix interferences: 1) eliminating the sample preservation step and 2) exploring a different cyanide method that

is more robust in mitigating interference. OC San may proceed with one or both options depending on laboratory staffing level and/or availability of new instrument to support a different cyanide method. In addition, OC San has been implementing a ROC characterization study since October 2022 to determine the potential severity of the matrix interference with cyanide and BOD testing and gathering baseline data to proactively conduct investigation for potential performance goal exceedances after the GWRS Final Expansion. The study will be completed after one year. Thus far, OC San has not observed any increasing trends of chlorine in the RO with the exception of some sporadic spikes. However, there has not been any performance goal exceedances during FY 2022/23.

#### 2.8.4 Chlorinated Phenols

Between January and February 2023, there were two consecutive exceedances for Chlorinated Phenols (Table 2.11). Therefore, an investigation ensued shortly after the second occurrence to determine the potential cause.

<b>Table 2.11 Fiscal Year 2022-2023 Monthly Performance Goals for Parameters with Two Consecutive Monthly Exceedances</b> Orange County Sanitation District, Resource Protection Division					
<b>Parameter</b>	<b>Performance Goal</b>	<b>First Exceedance</b>		<b>Second Exceedance</b>	
Chlorinated Phenols	0.54 µg/L	January 2023	1.11 µg/L	February 2023	0.824 µg/L

The investigation included a review of the methodology used to determine the performance goal value of 0.54 µg/L. The Chlorinated Phenols performance goal was based upon the same data used to establish the performance goal for 2,4,6-trichlorophenol; this compound has the same average monthly performance goal (0.54 µg/L) and mass emission benchmark (0.15 MT/yr) as the total chlorinated phenols. Historically, the MDL for 2,4,6-trichlorophenol has ranged from 0.18 to 2 µg/L, with an average of 0.96 µg/L. When OC San’s current NPDES permit was being developed, the performance goal for this compound was derived from the maximum effluent concentration (MEC) observed between May 2015 and December 2019. During that period, there was one detection of 2,4,6-trichlorophenol at a concentration of 0.54 µg/L, resulting in a performance goal being established at this MEC. However, this value of 0.54 µg/L was flagged as an estimated value (DNQ) in OC San’s DMR submissions due to the value being above the laboratory’s detection limit but below the laboratory’s reporting limit. OC San questions whether it is appropriate to use estimated values in the establishment of performance goals, as these results may not be substantive, and using values below the reporting limit for a given method may result in unreasonable performance goals.

In addition, OC San reviewed how the Chlorinated Phenols results were being calculated. OC San’s NPDES permit states that, when calculating the sum of several constituents, values characterized as ND or DNQ should be considered as having a concentration of zero. Because the values for 2,4,6-trichlorophenol and 2-chlorophenol reported in January and February 2023 were reported as DNQ and ND, respectively, those values should not have been included in the total chlorinated phenols calculation. When performing the calculation in accordance with the instructions in the permit, the only quantifiable data would have been pentachlorophenol at a concentration of 0.74 µg/L and 0.82 µg/L as opposed to 1.11 µg/L and 1.23 µg/L for January and February 2023, respectively. Although these values are still above the performance goal of 0.54 µg/L, pentachlorophenol itself is not subject to any performance goal. OC San plans to discuss this matter further with the EPA and SARWQCB.

One final finding of the investigation was that OC San has not historically observed significant concentrations of Chlorinated Phenols in OC San’s treatment plants. These detections in the final effluent have taken place after the GWRS Final Expansion. Chlorinated Phenols have been detected in the ROC received from OCWD, and OC San continues to monitor this wastestream along with permit compliance sampling points. No detections for Chlorinated Phenols in excess of the performance goal have occurred since February 2023.

As OC San continues to upgrade its facilities to support GWRS Final Expansion, the 5-year performance data upon which the permitted performance goals were based are expected to diverge from future plant performance data due to the additional 30 MGD of water reclamation. The permit writers were informed of these operational improvements in advance and inserted provisions within the permit to allow OC San to request permit modifications to support additional water reuse.

Data for each parameter with a performance goal is presented in Table 2.12, and OC San intends to consider these values as part of its annual review of local limits.

**Table 2.12 Performance Goal Data for Fiscal Year 2022-2023**  
Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2022	Aug 2022	Sep 2022	Oct 2022	Nov 2022	Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023
			(µg/L)											
<b>Marine Aquatic Life Toxicants</b>														
Arsenic, total recoverable	6.62	0	3.81	3.27	2.61	2.71	3.62	1.79	3.39	3.91	2.18	1.62	3.32	3.6
Cadmium, total recoverable	0.24	0	ND	ND	ND	ND	ND	ND	0.22	0.11	ND	ND	0.11	ND
Chromium (VI)	1.55	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium (Total)			1	0.96	0.87	0.77	0.97	0.81	1.09	1.27	0.79	0.79	1.09	1.34
Copper, total recoverable	18.31	0	7.44	3.3	3.01	4.77	3.31	7.04	5.33	5.42	10.1	3.66	4.12	3.93
Lead, total recoverable	0.62	0	0.12	0.2	ND	0.15	0.12	0.17	0.21	0.22	0.14	ND	0.24	0.14
Mercury, total recoverable	0.0071	0	0.0049	0.0031	0.004	0.0044	0.005	0.0061	0.0026	0.0039	0.0045	0.003	0.007	0.004
Nickel, total recoverable	23.50	0	7.45	8.47	5.03	5.61	8.27	5.13	8.93	9.26	5.22	5.48	9.24	10.5
Selenium, total recoverable	21.90	0	16.5	9.96	8.29	10.1	13.2	8.57	12.8	13.2	6.36	6.33	9.9	12.7
Silver, total recoverable	0.16	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc, total recoverable	46.01	0	21.7	24.2	14.9	18.7	24.1	18.8	32.2	39.2	21.9	22.4	25.4	35.5
Cyanide, total recoverable	5.88	0	3.52	2.635	3.92	3.3	3.92	4.76	2.93	4.38	4.03	4.27	ND	5.64
Ammonia as nitrogen	36,743	1	29,281	28,113	28,907	27,700	30,593	32,684	34,881	37,575	21,471	23,073	32,655	33,960
Non-chlorinated phenols	1.56	0	ND	ND	ND	ND	0.2	0.1	0.19	ND	ND	ND	ND	NA
Chlorinated phenols	0.54	3	ND	ND	ND	0.22	0.88	0.36	1.11	0.824	ND	ND	ND	NA
Endosulfan	0.011	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Endrin	0.021	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Hexachlorocyclohexane (HCH)	0.011	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
<b>Human Health Toxicants – Non-Carcinogens</b>														
Acrolein	10.65	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Antimony	2.54	0	1.14	1.55	0.96	1.01	1.5	1.12	1.78	1.49	0.8	0.63	1.25	1.62
Bis(2-chloroethoxy) methane	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Bis(2-chloroiso-propyl) ether	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Chlorobenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chromium (III)	1.55	0	1	0.96	0.87	0.77	0.97	0.81	1.09	1.27	0.79	0.79	1.09	1.34
Chromium (Total)			1	0.96	0.87	0.77	0.97	0.81	1.09	1.27	0.79	0.79	1.09	1.34
Di-n-butyl-phthalate	1.80	0	ND	ND	0.34	ND	ND	ND	0.53	0.41	ND	ND	ND	NA
Dichlorobenzenes	2.13	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Diethyl phthalate	0.76	2	2.21	ND	5.43	ND	ND	ND	ND	0.7	ND	ND	ND	NA
Dimethyl phthalate	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
4,6-dinitro-2-methylphenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA

**Table 2.12 Performance Goal Data for Fiscal Year 2022-2023**  
Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2022	Aug 2022	Sep 2022	Oct 2022	Nov 2022	Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023
			(µg/L)											
2,4-dinitrophenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Ethylbenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Fluoranthene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Hexachlorocyclopentadiene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Nitrobenzene	0.38	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Thallium	0.20	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	0.19	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Tributyltin	0.25	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1,1-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
<b>Human Health Toxicants – Carcinogens</b>														
Acrylonitrile	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Aldrin	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Benzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Beryllium	1.07	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis(2-chloroethyl) ether	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Bis(2-ethylhexyl) phthalate	3.90	0	ND	ND	ND	ND	ND	ND	ND	0.61	0.57	ND	0.79	NA
Carbon tetrachloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chlordane	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Chlorodibromomethane	4.25	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chloroform	16.60	0	4.67	NA	NA	4.32	NA	NA	4.98	NA	NA	ND	NA	NA
DDT	0.011	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
1,4-dichlorobenzene	0.43	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
3,3'-dichlorobenzidine	1.47	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,2-dichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1-dichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Dichlorobromomethane	8.98	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Dichloromethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,3-dichloropropene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Dieldrin	0.007	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
2,4-dinitrotoluene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,2-diphenylhydrazine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Halomethanes	0.43	0	0.0847	NA	NA	0.165	NA	NA	0.281	NA	NA	ND	NA	NA
Heptachlor	0.009	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA

**Table 2.12 Performance Goal Data for Fiscal Year 2022-2023**  
 Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2022	Aug 2022	Sep 2022	Oct 2022	Nov 2022	Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023
			(µg/L)											
Heptachlor epoxide	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Hexachlorobutadiene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Hexachloroethane	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Isophorone	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodimethylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodi-n-propylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodiphenylamine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
PAHs	1.59	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,1,2,2-tetrachloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Tetrachloroethylene	1.58	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Trichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1,2-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
2,4,6-trichlorophenol	0.54	0	ND	ND	ND	0.22	ND	0.36	0.37	0.41	ND	ND	ND	NA
Vinyl chloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA

**Highlighted** – result greater than Performance Goal  
 ND – not detected at a concentration greater than the method detection limit  
 NA – not analyzed

## **Chapter 3. Permits**

### **3.1 Introduction**

The Orange County Sanitation District (OC San) implements permitting and certification control mechanisms which contain effluent limits for all standards, statements of duration and non-transferability, self-monitoring, sampling, reporting, record-keeping, notification requirements, and statements of applicable civil and criminal penalties for discharge violations. The following sections describe permit classifications and the methods by which permittees are identified and discharge limits are established.

### **3.2 Permit Classifications**

There are seven permit and certification classifications for users that discharge to OC San's sewerage system: Class I, Class II, Wastehaulers, Special Purpose, Dry Weather Urban Runoff Diversion, FOG (fats, oils, and grease), and Discharge Certifications.

#### **Class I Permits**

Class I dischargers are defined as Significant Industrial Users (SIUs) in accordance with federal regulations. Examples of these users include metal finishers, printed circuit board shops, large food processors, textile companies, and industries with the potential to discharge constituents of concern. A listing of the Class I permittees is provided in Appendix A.

A Class I permit is issued to any user who meets any one of the following conditions:

1. Is subject to Federal Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N, or
2. 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
3. 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
4. Is designated as such by OC San on the basis that the 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
5. May cause Pass Through affecting OC San's ability to comply with its NPDES Permit or other regulations and standards, or
6. May cause Interference with OC San's Sewerage Facilities.

#### **Class II Permits**

Class II permittees include commercial enterprises such as restaurants, supermarkets, large entertainment/service venues, or other high-use non-SIU.

A Class II permit is issued to any user who meets all the following conditions:

1. Has 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
2. Discharges waste other than sanitary, and
3. Is not otherwise required to obtain a Class I permit.

#### **Wastehauler Permits**

Wastehauler permits are issued to those users who are engaged in vehicular transport and subsequent disposal of biodegradable waste into OC San's system. Wastehauler permittees dispose of septic tank/cesspool, restaurant grease trap, and portable toilet wastes at OC San's dedicated disposal facility



located at Reclamation Plant No. 1 in Fountain Valley. The discharge of industrial wastewater by any wastehauler is prohibited unless written authorization from OC San has been obtained.

### **Special Purpose Discharge Permits**

SPDPs are issued to dischargers for the purpose of discharging groundwater, surface run-off, subsurface drainage, or unpolluted water directly or indirectly to OC San's facilities when no alternative method of disposal is reasonably available, or to mitigate an environmental risk or health hazard. This primarily includes groundwater remediation and construction dewatering projects.

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

OC San administers the local FOG Control Program for FSEs that discharge directly to OC San-owned sewer pipelines. Ordinance OCSD-25 provides for the establishment of the FOG Control Program and the enforcement of program requirements by OC San's Resource Protection Division. The goal of the program is to eliminate sanitary sewer overflows (SSOs) which are caused by discharges from FSEs. Additional information can be found in Chapter 9.

### **Discharge Certifications**

A Discharge Certification may be issued to non-categorical industries that generate wastewater containing pollutants of concern and have the potential for violating any pretreatment standard or requirement. Zero Discharge Certifications are issued to 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.

## **3.3 Permit Issuance**

During FY 2022/23, the pretreatment program managed a total of 533 active permits/certifications. A total of 24 new permits were issued, including 13 Class I permits, one FOG permit, four wastehauler permits, and six special purpose discharge permits. 32 permits were listed as void or expired during the fiscal year (most due to ownership, location, or class changes and subsequent re-issuances), including 17 Class I permits, one Class II permit, two FOG permits, seven Special Purpose Discharge Permits, four wastehauler permits, and one zero discharge certification. Of the 329 Class I permits (SIUs), 192 were subject to Federal Categorical Pretreatment Standards. Of the seven Special Purpose Discharge Permits that were voided/expired, and the six newly issued Special Purpose Discharge Permits, one of these were short-term issuances, that is, newly issued and voided or expired during the same reporting period. Similarly, 13 newly-issued Class I permit was issued and voided within the FY 2022/23 reporting period. This level of permit activity represents no significant change compared to the total number of active permits at the end of the previous fiscal year.

### **3.3.1 Identification of New Permittees**

OC San surveys various sources for companies that may require a control mechanism, including those that are subject to Federal Categorical Standards or local limits. Wastewater discharge permits are issued to those businesses as required. OC San obtains new business information from the following:

- City Business Licensing Departments
- Santa Ana Regional Water Quality Control Board's permit database
- OC San Engineering Department connection permits
- OC San Finance Department new sewer service referrals
- *OC Register* newspaper
- Agency referrals during Strike Force meetings
- Currently permitted industries

Historically, most new permittees had been identified by OC San field inspectors during the course of inspecting existing permittees, and when following up on new industries that move into a former permittee's company location. Since 2018, OC San has collaborated with all of its member agencies and set up an ongoing program to collect data on all new and renewed business licenses. The initial effort collected data quarterly to space out the license review, but the program now collects data on a semiannual basis to stay current. The initial effort also included a plan for OC San to identify industrial dischargers from county and unincorporated areas where business licenses are not issued. These areas require physical searches to ensure that OC San's entire service area is evaluated to comply with US EPA's requirements for a comprehensive Industrial Waste Survey.

### **3.4 Discharge Limits**

#### **3.4.1 Industrial**

In 1976, OC San established discharge limits for specific pollutants. These limits became increasingly restrictive over a three-phased implementation period designed to give industry adequate time to comply with the more stringent standards. The limits were adopted by OC San's Boards of Directors in 1976 and were published in OC San's Ordinance. New concentration limits were adopted in the revised Ordinance, which became effective July 1, 1983.

On September 8, 1989, the Boards of Directors adopted a new ordinance which contained essentially the same concentration limits as the previous ordinance. Revisions included the creation of a specific limit of 0.1 milligrams per liter (mg/L) for polychlorinated biphenyls (PCB), a limit of 0.1 mg/L for pesticides, and specific limits for wastehaulers. It also included specific discharge limits for biochemical oxygen demand (BOD); the maximum BOD limit was 15,000 pounds per day (lb/d). These BOD limits were established to prevent pass-through and interference.

The 1989 Ordinance was subsequently revised in February 1992, July 1998, July 2007, July 2008, and October 2009, but with no change to the local discharge limits. Since the implementation of the Federal Categorical Standards in April 1984, OC San applies the more stringent of either the Federal Categorical Standards or OC San's local discharge limits. In 2016, OC San completed a local limits study and revised its ordinance per US EPA audit findings, effective July 1, 2016. The 2016 Ordinance removed the numeric BOD concentration limit; removed the cyanide amenable and Total Toxic Organic limits; revised chromium and silver limits; and added 1,4-dioxane, molybdenum, and selenium limits. The 2016 Ordinance was revised in July 2019, but with no change in the local discharge limits. As of this reporting period, the limits set in 2016 are still in effect and shown in Table 3.1.

<b>Table 3.1 OC San's Maximum Allowable Local Discharge Limits</b> Orange County Sanitation District, Resource Protection Division			
<b>Constituent</b>	<b>Limit (mg/L)</b>	<b>Constituent</b>	<b>Limit (mg/L)</b>
1,4-Dioxane	1.0	Nickel	10.0
Arsenic	2.0	Oil and Grease of Mineral or Petroleum Origin	100.0
Cadmium	1.0	Pesticides	0.01
Chromium (Total)	20.0	Polychlorinated Biphenyls (PCB)	0.01
Copper	3.0	Selenium	3.9
Cyanide (Total)	5.0	Silver	15.0
Lead	2.0	Sulfide (Dissolved)	0.5
Mercury	0.03	Sulfide (Total)	5.0
Molybdenum	2.3	Zinc	10.0

### 3.4.2 Wastehaulers

After evaluating reference materials from the US EPA and laboratory results from wastehauler samples taken by OC San, pollutant limits were established for wastehaulers discharging biodegradable waste that express the maximum expected heavy metal concentrations for domestic wastes found in septic tank/cesspool wastes. These limits are shown in Table 3.2.

<b>Table 3.2 OC San's Maximum Allowable Discharge Limits for Wastehaulers Discharging Domestic Septage to OC San Wastehauler Stations</b> Orange County Sanitation District, Resource Protection Division	
<b>Constituent</b>	<b>Limit (mg/L)</b>
Cadmium	1.0
Chromium	35.0
Copper	25.0
Lead	10.0
Nickel	10.0
Zinc	50.0

### 3.5 Establishing Mass Emission Rates (MER)

OC San uses a dual approach to regulating wastewater constituents. Most Class I permits are issued both concentration-based limits and mass emission limits to encourage water conservation, waste minimization, and recycling; to limit the total mass of pollutants that enter the treatment facilities; and to deter facilities from achieving compliance through dilution. For concentration limits, OC San applies either the Federal Categorical Standards or OC San's local discharge limits (shown in Table 3.2), whichever are more stringent. Mass emission rate limits are calculated using the applicable concentration limits in combination with an industry's multi-year average wastewater flow (referred to as a "flow base" rate). The flow base rate is determined at the time a permit is initially issued, renewed, or revised.

The volume of wastewater used in establishing a permittee's limits is based on flow rate data, water meter information, or additional reports submitted to OC San. Unless additional water losses can be substantiated,

or another batch, process, or effluent meter measurement device is in place, 95% of the influent city water meter reading is considered to be discharged to the sewer. The remaining 5% is a standard allowance for losses in process, evaporation, and landscape use. An allowance for domestic waste is computed based on a daily usage rate of 25 gallons per employee per 8-hour shift. If there is documentation showing other water losses, such as product water loss or boiler loss, that are greater than the standard 5% deduction, then adjustments can be made to accommodate these losses. If water conservation beyond normal industrial practice takes place, the flow base may be adjusted to account for water conservation and/or water recycling.

The user's annual average industrial wastewater discharge, calculated as described above, is divided by the number of operational discharge days per year to yield the net discharge in gallons per day. OC San can use the mass limit (expressed in lb/d) as an evaluation tool, if a permittee is introducing large quantities of water in an attempt to dilute concentrations to meet categorical requirements. In order to maintain long-term compliance with permit limits and conditions, a permittee must evaluate pretreatment capacity as a result of a change in production and subsequent change in wastewater discharge.

If a permittee exceeds the MER or concentration waste discharge limits, the permittee is subject to enforcement action(s) in accordance with OC San's Ordinance and *Enforcement Response Plan*, which may include administrative penalties.

## Chapter 4. Inspection, Sampling, Compliance, & Enforcement

### 4.1 Introduction

This chapter details the inspection, sampling, and enforcement activities of the OC San Industrial Pretreatment Program for FY 2022/23.

The goal of OC San's Industrial Pretreatment Program is to ensure that dischargers maintain compliance with Federal Pretreatment Standards and the Ordinance and discharge limits through monitoring and verification, in addition to controlling and reducing industrial pollutants.

An individual industrial discharge status summary of all Class I permittees is provided in the Monitoring and Compliance Status Report for FY 2022/23 (Appendix A). The following sections describe OC San's inspection, monitoring and enforcement efforts, and summarize permittees' compliance with US EPA Categorical Standards and OC San's local discharge limits.

### 4.2 Routine Inspection and Sampling

OC San's Source Control Inspection group consists of one supervisor, one principal environmental specialist, 10 field inspectors, three technicians, and one administrative assistant. Inspectors provide a visible presence at industrial facilities and deter non-compliant conduct through on-site sampling and inspections. The inspectors perform inspections at each permittee's facility at least once per calendar quarter. Discharge samples are taken during each inspection for all pertinent regulated constituents based on permit requirements.

Inspections may include an evaluation of manufacturing plant processes and pretreatment equipment to observe and discuss changes, verification of waste manifests and other waste disposal documents, measurement of industrial wastewater flows, field testing and sample collection of wastewater, and a review of regulations, policies, and procedures for the implementation of the pretreatment program.

Composite samples of a permittee's discharge are collected using automatic samplers and are time-composited over a 24-hour period. US EPA sampling guidelines are used by the Source Control Inspectors for collecting and preserving samples. In conjunction with each inspector's on-site observations, the results of laboratory analyses are used to verify compliance status, help disclose potential operational and housekeeping problems, evaluate the adequacy of pretreatment systems, and detect new sources of regulated substances. Grab samples are collected for the determination of compliance with TTOs, cyanides, oil and grease, and pH.

During FY 2022/23, OC San staff conducted 1,542 inspections and collected 3,591 samples. Compared to last fiscal year, the number of conducted inspections decreased this year by 4% and the number of samples decreased by 2% (Table 4.1).

	Fiscal Years				
	2018-19	2019-20	2020-21	2021-22	2022-23
Inspections*	1,362	1,422	1,664	1,611	1,542
Samples Collected	3,235	3,831	3,515	3,648	3,591

\*Site visits to facilities to assess compliance.

### **4.3 Non-Routine Sampling and Inspection**

OC San Source Control Inspection staff perform duties beyond routine sampling and inspection, as summarized below:

- Enforcement inspections are performed in response to compliance problems and typically involve close cooperation with the permittee to identify and correct deficiencies. Source Control Inspectors resample noncompliant industries within 30 days from the date the violation is issued and submit compliance inspection reports to document corrective measures taken and to support enforcement actions.
- Inspectors participate in multi-agency operations such as warrant inspections and environmental audits, working jointly with other agencies enables inspectors to recognize potential problems in other regulatory areas such as air quality and hazardous waste.
- Chronic violators are subject to increased monitoring and inspection activity, which may include extended periods of on-site sampling.
- Source Control Inspectors perform routine sampling for cyanide at facilities that have cyanide processes on site. The sampling occurs at the end of cyanide treatment or at the end of the cyanide process, prior to comingling with non-cyanide bearing wastestreams. The purpose of this sampling is to confirm that all cyanide-bearing wastewater is treated.
- Random sampling throughout the collection system is performed in areas where there is an increased potential for illegal dumping by industries. These sampling events are generally precursors to downstream monitoring projects (described in Section 4.3.1) when illicit discharging is suspected.
- Field support is provided to the Non-Industrial Source Control (NISC) team within the Resource Protection Division in support of their ongoing programs, including inspections at 10 radiator shops and quarterly sampling at 20 Dry-Weather Urban Runoff diversions.
- Providing resources to OC San's operations, collections, compliance, and laboratory groups in performing sampling and inspections in relation to special studies or ongoing projects.
- On a monthly basis Source Control Inspection staff collect composite samples on each of OC San's 12 trunklines at both OC San plants for several days to one week. This monitoring allows OC San to identify any potential problems on individual trunklines, as well as to study the correlation between influent, effluent, and biosolids.

#### **4.3.1 Downstream Sampling**

Covert sampling is conducted downstream of an industry to verify continued discharge compliance or to identify illicit discharges. Sampling is conducted both upstream and downstream to isolate the industry's discharge. This sampling is performed in manhole structures in local sewer systems over the course of several days.

Three downstream monitoring events were conducted during FY 2022/23.

### **4.4 Orange County Hazardous Materials Strike Force and Joint Agency Inspections**

The Orange County Strike Force is comprised of state, county, city and other local agencies capable of identifying, investigating, and prosecuting dischargers of hazardous materials to the environment. The initial goals of the Strike Force were to define the roles and responsibilities of each participating agency; establish the scope of the cases to be handled; emphasize cooperative identification, investigation, and prosecution of violators; and develop protocols among all participating agencies to create a coordinated enforcement system. An overall protocol was adopted by the Orange County Board of Supervisors in June 1988. The Orange County District Attorney's Office conducts monthly Strike Force meetings to discuss investigative strategies, ongoing investigations/cases, and identification of potential new cases.

OC San staff spent approximately 65 hours assisting the Strike Force in FY 2022/23 by attending meetings and conducting fieldwork in support of Strike Force activities. In FY 2022/23, OC San performed inspection related activities involving Strike Force referrals or investigations.

OC San participates in joint agency inspections of industries suspected of violating hazardous waste and sewer discharge regulations. This cooperative effort involves other agencies such as the Orange County Health Care Agency and the Orange County District Attorney's Office, responsible for environmental management and citizen safety. OC San conducts both referral-based and agency independent inspections as well as joint inspections with other agencies when necessary. These inspections aided in correcting existing and potential discharge problems and provide for collaborative enforcement opportunities between participating agencies.

#### **4.5 Industrial Compliance Status with Discharge Limits**

OC San monitors and evaluates the compliance status of all regulated industries to determine the applicability of additional enforcement actions. Analytical monitoring results are reviewed by the source control supervisor, and limit exceedances are investigated and re-sampled to determine if the cause is a chronic problem. Additionally, should the inspectors identify any deficiencies in an industry's process, treatment, and/or discharge system, the industry is notified of the situation, findings are documented in inspection reports and discussed with permit engineers, and corrective measures as required are communicated to the industry to be implemented. A summary of the significant industrial users' compliance status for FY 2022/23 is shown in Appendix A.

##### **4.5.1 Industries in Significant Noncompliance (SNC)**

At the end of each quarter, OC San is required to evaluate their industrial users' compliance status using a six-month time frame. Under this system, each industrial user is evaluated for SNC four times during the year, and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year, through the end of the current year). OC San is required to annually publish in the local newspaper all industrial users that have been identified as SNC during the past year when the SNC criteria were met during any of the previous four quarters. If a facility has been determined to be in SNC based solely on violations which occurred in the first quarter of the 15-month evaluation (i.e., the last quarter of the previous pretreatment year) and the facility has demonstrated consistent compliance in the subsequent four quarters, then OC San is not required to publish the industrial user (IU) in the newspaper if the IU was published in the previous year for the same violations.

As of June 30, 2023, of the active 329 Class I permittees, there were 31 (9.4%) that had been classified as SNC; 20 of these were categorical industries, and 12 were non-categorical. An industry was determined to be 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, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits.
- Technical Review Criteria (TRC) violations, also known as "acute violations," defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement, (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW ("Publicly Owned Treatment Works," which in this case is OC San) determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public).

- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

A summary of the permittees in SNC is presented in Table 4.2. The SNC list was published in the October 30, 2023 issue of the Orange County Register; a copy of the announcement is presented in Appendix E.

<b>Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division			
<b>Company Name</b>	<b>Permit No.</b>	<b>Category</b>	<b>City</b>
<b><i>Industries SNC Due to Discharge Violations</i></b>			
Arrowhead Products Corporation	1-031137	Iron And Steel Manufacturing, Nonferrous Metals Forming And Metal Powders	Los Alamitos
CP-Carrillo, Inc. (McGaw)	1-571316	OC San Local Limits	Irvine
Hightower Plating & Manufacturing Co.	1-021185	Metal Finishing	Orange
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
Weber Precision Graphics	1-011354	OC San Local Limits	Santa Ana
<b><i>Industries SNC Due to Reporting Violations</i></b>			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Auto-Chlor System of Washington, Inc.	1-511384	Soap And Detergent Manufacturing	Santa Ana
Bioduro LLC (Fairbanks)	1-601616	Pharmaceutical Manufacturing	Irvine
Bioduro LLC (Jeronimo)	1-601617	Pharmaceutical Manufacturing	Irvine
Bodycote Thermal Processing	1-031120	OC San Local Limits	Westminster
Brea Power II, LLC	1-521837	OC San Local Limits	Brea
Coast to Coast Circuits, Inc.	1-111129	Metal Finishing	Huntington Beach
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
Fabrication Concepts Corporation	1-011068	Metal Finishing	Santa Ana
Gold Coast Baking Company, Inc.	1-601700	OC San Local Limits	Santa Ana
Hartwell Corporation	1-021381	OC San Local Limits	Placentia



<b>Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division			
<b>Company Name</b>	<b>Permit No.</b>	<b>Category</b>	<b>City</b>
Kraft Heinz Company	1-071056	OC San Local Limits	Irvine
Logi Graphics, Inc.	1-031049	Metal Finishing	Huntington Beach
Manufactured Packaging Products	1-521793	OC San Local Limits	Brea
Markland Manufacturing, Inc.	1-011046	Metal Finishing	Santa Ana
Master Wash, Inc.	1-511399	OC San Local Limits	Santa Ana
Nobel Biocare USA, LLC	1-521801	Metal Finishing	Yorba Linda
O'Donnell Oil, LLC	1-581191	Oil and Gas Extraction	Huntington Beach
Only Cremations for Pets (Stanton)	1-601085	OC San Local Limits	Stanton
Pacific Western Container	1-511371	OC San Local Limits	Santa Ana
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim
Soldermask, Inc.	1-031341	Metal Finishing	Huntington Beach
Thompson Energy Resources, LLC (Brea)	1-601469	Oil and Gas Extraction	Brea
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim
<b><i>Industries SNC Due to Discharge and Reporting Violations</i></b>			
Mercial, LLC	1-600655	Pharmaceutical Manufacturing	Orange
Shepard Bros., Inc.	1-031034	Soap And Detergent Manufacturing	La Habra

#### **4.6 Enforcement Activities**

During FY 2022/23, OC San initiated or continued various enforcement actions to bring industries into compliance. This section describes the types of enforcement actions taken against noncompliant SIUs. In addition, Appendix J shows a listing of pretreatment equipment that has been installed by OC San's permittees.

As provided in the Ordinance and (ERP), 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 letters, probation orders, enforcement compliance schedule agreements (ECSA), instituting emergency suspension orders, permit suspension, and permit revocation orders.

OC San's enforcement program is designed to bring noncompliant industries back into compliance with Federal Pretreatment Standards and OC San's local discharge limits. If permittees violate a discharge limit, an enforcement action is initiated. This includes the assessment and issuance of noncompliance sampling fees and requiring the permittee to conduct additional sampling along with OC San conducting additional sampling. Subsequent noncompliance may result in issuing an order or compliance requirement letter detailing corrective measures, requiring the installation of additional pretreatment equipment, requiring the implementation of pollution prevention measures, issuing emergency suspension orders, or suspending or revoking the wastewater discharge permit.

#### **4.6.1 Compliance Inspections**

OC San staff conduct compliance inspections to: (1) identify and address any noncompliance problems and corrective actions; and (2) verify the progress and completion of compliance requirement letters, probation orders, or enforcement compliance schedule agreements.

During FY 2022/23 OC San conducted **44 compliance inspections**.

#### **4.6.2 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.

During FY 2022/23 OC San conducted **11 compliance meetings**.

#### **4.6.3 Compliance Requirement Letters**

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

During FY 2022/23 OC San issued **45 compliance requirement letters**.

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

Orders are issued where a permittee is continually noncompliant or has committed one or more violations of the permit and/or Ordinance. The order requires a permittee to comply with a specific condition of the permit and/or Ordinance and may notify the permittee of escalated enforcement in accordance with the ERP, such as a compliance meeting.

During FY 2022/23 OC San issued **6 orders**.

#### **4.6.5 Notices of Violation – Noncompliance Fees and Penalties**

An NOV is written notification from OC San that references findings from recent sampling programs and indicates that specific violations of the permittee's discharge limits have occurred. The NOV is usually accompanied by noncompliance sampling and/or processing fees. The NOV instructs the permittee to take immediate action to correct the problem.

During FY 2022/23, OC San issued **125 notices of violations to 85 significant industrial users**.

When a permittee violates its permit limits or conditions, noncompliance fees are assessed at rates that have been adopted by OC San's Board of Directors. For FY 2022/23, noncompliance fees, penalties, settlements, interest, and judgements totaling \$67,326 were issued to SIUs (for details see Appendix D). Fees also include those from SNC permittees whose names were published in the local newspaper, and for individual self-monitoring noncompliance fees.

#### **4.6.6 Notices to Inform – Intentional Falsification of Self-Monitoring Reports**

A notice to inform for intentional falsification of self-monitoring reports pertains to violations involving the permittee's intentional alteration or falsification of information contained in a self-monitoring report. The notice instructs the permittee to provide an explanation and that additional enforcement may include an administrative complaint for subsequent violations.

During FY 2022/23 OC San issued **1 notice to inform for intentional falsification of self-monitoring reports**.

#### **4.6.7 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, and waste minimization alternatives, and increasing the frequency of self-monitoring.

During FY 2022/23 OC San did not issue any **probation orders**.

#### **4.6.8 Enforcement Compliance Schedule Agreement**

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.

During FY 2022/23, OC San **did not issue any enforcement compliance schedule agreements**.

#### **4.6.9 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 their designee, determines that a permittee would not be in compliance with the newly adopted or revised discharge limits, the permittee may be required to enter into a RCSA with OC San. The terms and conditions of a RCSA require the permittee to achieve compliance with all new standards by a specific date. RCSAs have a maximum term of two hundred seventy (270) days.

The issuance of a RCSA may contain terms and conditions including but not limited to, requirements for installation of pretreatment equipment and facilities, submittal of drawings or reports, waste minimization practices, or other provisions to ensure compliance with OC San's Ordinance. While the RCSA is in effect, any discharge by the permittee in violation of the RCSA will require payment of noncompliance sampling fees in accordance with Article 6 of OC San's Ordinance.

During FY 2022/23 OC San did not issue any **regulatory compliance schedule agreements**.

#### **4.6.10 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.

During FY 2022/23, OC San **issued 1 administrative complaint**.

#### **4.6.11 Permit Suspensions**

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 evidence to a designated hearing officer. After the conclusion of the hearing, a written determination is made by the hearing officer. Upon issuance of a suspension order, the permittee must cease all discharges to the sewer for the duration of the suspension.

During FY 2022/23, OC San **did not issue any permit suspensions**.

#### **4.6.12 Permit Revocations**

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.

During FY 2022/23 OC San **did not issue any permit revocations.**

#### **4.6.13 Emergency Suspension Order**

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

During FY 2022/23, OC San **did not issue any emergency suspension orders.**

#### **4.6.14 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.

During FY 2022/23, OC San **did not file any civil or criminal complaints.**

#### **4.7 Enforcement Summary**

This section summarizes various enforcement actions conducted for in FY 2022/23 reporting year. 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.

##### **A & G Electropolish (Permit No. 1-531422)**

A & G Electropolish (A&G) performs electropolishing on stainless steel components for aerospace, commercial, medical, pharmaceutical, automotive, food, and military/defense applications. As an electropolishing job shop, A&G works exclusively on customer-supplied items consisting of tubing, stamped and machined parts, and fabricated assemblies. A&G also has deburring, fabrication, and machining operations to assist with customer jobs. The effluent discharge at A&G is generated by the spent alkaline cleaning and nitric pickling/passivation solutions, and the associated rinse and dragout wastestreams. Wastewater is treated in batches using caustic soda and sulfuric acid. Each batch is released to the sewer after a final metals check for copper and chromium.

##### **July 1 – December 31, 2022**

A&G had no violations during this reporting period.

##### **January 1 – June 30, 2023**

In January 2023, A&G exceeded the monthly average discharge limit for copper, for which an NOV was issued on April 4, 2023. OC San will continue enforcement during the next reporting period and continue to monitor A&G's discharge and compliance status on a quarterly basis.

### **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 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 O&M 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.

#### **July 1 – December 31, 2022**

On July 13, 2022, OC San completed a resample for the violations that occurred in the previous reporting period which showed wastewater discharge to be compliant. On September 13, 2022, OC San issued an NOV for June's monthly average zinc violation. On November 30, 2022, OC San conducted a compliance inspection to investigate the cause for the heavy metals violations that occurred on June 9, 2022. At the time of inspection, ATP attributed the violations to improper sludge management. The facility reported personnel initiate sludge management once solids are observed at the sample point. During the inspection, OC San noted facility drawings 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.

On December 6, 2022, OC San issued a compliance requirements letter directing ATP to attend a compliance meeting to discuss facility drawings, recent non-compliances, pretreatment and waste segregation, and facility recordkeeping. During the compliance meeting on December 21, 2022, ATP stated operator error, irregular equipment calibration, and improper sludge management contributed to recent violations. In response, 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. Despite the facility's improvements, the risk remained 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. On December 22, 2022, OC San issued an NOV for failure to provide prior written notification of process changes. OC San had directed 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. ATP was required to submit this report and updated facility drawings by January 31, 2023.

#### **January 1 – June 30, 2023**

On January 31, 2023, ATP submitted a letter that summarized recent facility modifications that were made without prior written notification to OC San. Additionally, ATP proposed to install a holding tank and new process control equipment by February 20, 2023. During this transitional period, ATP indicated that facility personnel would utilize handheld sensors to confirm treatment parameters. Upon thorough review, OC San determined that the use of handheld meters and the manual application of pretreatment chemistry to control wastewater are not an acceptable method for interim or long-term compliance. On February 6, 2023, OC San issued a compliance requirements letter directing ATP to reinstall the automated process

control equipment and submit a proposal to ensure adequate treatment of all wastestreams by March 15, 2023, along with an updated operations and maintenance manual to be submitted by April 15, 2023.

On March 15, 2023, ATP submitted several proposals to OC San. These proposals included plans to install a holding tank for segregating rinses from spent process solution, adjusting treatment parameters based on their chemical vendor's recommendations, and updating waste management practices. However, upon review, these proposals were found to have several deficiencies. The issues identified included an incomplete waste characterization, missing technical specifications related to treatment chemistry, and omitted correspondence with chemical vendors. Additionally, the facility indicated that personnel would transfer spent process solution to the batch tank manually using drums and flexible hosing, a practice that previously violated OC San enforcement guidelines.

On April 16, 2023, ATP submitted an operations and maintenance manual. Similarly, this manual contained deficiencies relative to waste characterization, technical specifications, and general facility information. Consequently, OC San directed ATP to resubmit both the operations and maintenance manual and waste treatment proposal by June 30, 2023.

OC San will continue enforcement during the next reporting period and continue to monitor ATP'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 too long for the process tanks. 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 RO/DI water, dried in the HEPA filtered environment, 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 filter press to treat wastestreams generated at the facility.

#### **July 1 – December 31, 2022**

Alloy Tech had no violations during this reporting period.

#### **January 1 – June 30, 2023**

On January 26, 2023, Alloy Tech had a daily average and instantaneous molybdenum violation for which an NOV was issued on February 8, 2023. On March 3, 2023, OC San conducted a compliance inspection to investigate the root cause of the molybdenum violation. During the inspection, Alloy Tech attributed the molybdenum violations to miscommunication. Specifically, Alloy Tech staff were not present to inform the OC San Inspector that the wastewater from Tank 2 was not ready for sampling and discharge to the sewer. Alloy Tech committed to improving communication by confirming with the OC San inspector when a batch of wastewater is ready for sampling and discharge to the sewer. Moreover, during the compliance inspection, Alloy Tech informed OC San that they were no longer pursuing Zero Valent Iron (ZVI) as treatment for molybdenum removal. On April 18, 2023, OC San issued a compliance requirement letter to Alloy Tech to submit a corrective action report and a proposal to ensure adequate treatment of industrial wastewater by May 19, 2023. On May 19, 2023, Alloy Tech submitted a corrective action report but did not submit the required proposal for treatment. On June 3, 2023, Alloy Tech submitted a proposal to add a 1,000-gallon recycled wastewater tank prior to discharge to the sewer. Alloy Tech indicated that the wastewater will pump through five-micron filter bags, granulated activated carbon vessels, and block carbon before entering the recycled wastewater tank. The wastewater will then be discharged to the sewer or sent

to a 500-gallon recycled wastewater tank to be used in their metal finishing operations. OC San is currently reviewing this proposal.

In May 2023, Alloy Tech had a zinc monthly discharge limit violation for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and 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, 2022

On September 2, 2022, AlSCO had instantaneous, daily average, and mass loading O&G-min. violations, for which an NOV was issued on October 4, 2022. On October 18, 2022, OC San conducted a compliance inspection at AlSCO to investigate the cause for the O&G-min. violation. On October 26, 2022, AlSCO submitted a corrective action report, which attributed the violations to a leak in a hydraulic line from one of the facility's industrial wash machines. In response, the facility replaced the hydraulic line and installed spill collection trays under each wash machine to prevent future releases from discharging to the wastewater collection system. Additionally, AlSCO instituted daily inspections for each wash machine's hydraulic system. AlSCO had no additional 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 AlSCO's discharge and compliance status on a quarterly basis.

January 1 – June 30, 2023

AlSCO had no violations during this reporting period.

**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 degrees 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, 2022

Aluminum Forge had no violations during this reporting period.

January 1 – June 30, 2023

On June 8, 2023, Aluminum Forge had a daily limit zinc violation for which an NOV will be issued in the next reporting period.

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

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

Aluminum Precision Products (APP) manufactures parts for the aerospace, automotive, commercial, military/defense, recreational, and transportation industries. Aluminum Precision's process consist of pre-heating, aluminum forging, etching/deoxidation, and deburring. Wastewater is generated from the etching/deoxidation, dye penetrant, spent deburring solutions, and quenching operations. APP operates a continuous pretreatment system which consists of pH adjustment, flocculation, metal precipitation and clarification. APP utilizes a filter press for sludge dewatering.

#### **July 1 – December 31, 2022**

On July 6, 2022, APP had copper exceedances of the daily average limit and the maximum limit for which an NOV was issued on July 26, 2022. Aluminum Precision conducted an investigation but was not able to readily identify a cause for the violations. The 30-day resample showed compliance with permit limits, although historical data indicates elevated levels of copper sporadically through the years.

#### **January 1 – June 30, 2023**

APP had no violations during this reporting period. OC San will follow-up on corrective actions with APP during the next reporting period and continue to monitor APP'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 to sewer.

#### **July 1 – December 31, 2022**

Amerimax had no violations during this reporting period.

#### **January 1, 2023 – June 30, 2023**

On June 23, 2023, Amerimax had a zinc mass loading violation for which an NOV will be issued during the next reporting period.

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

### **Anodyne, Inc. (Permit No. 1-511389)**

Anodyne, Inc. (Anodyne) is a job shop that performs anodizing, plating and painting operations on customer supplied parts. Parts are made of aluminum, copper, steel, stainless steel, and titanium. Anodyne has the capability of performing Anodizing (Type 1,2,3), chem film, clear chromic dip, conversion coating, dye coating, electroless nickel plating, acid copper plating, cadmium plating, zinc plating, electroless nickel/boron plating, aluminum and copper bright dip, metal stripping, passivation (types II, VI, and VII), olive drab, tin lead and matte tin plating, nickel strike, copper strike, strippers, alkaline cleaners, ultrasonic cleaners, zincate, various color dyes, neutralizers, and chemical etching.

The effluent at Anodyne is generated by the spent process solutions and running rinses following cleaning, activation, and plating. Dye penetrant testing wastewater is generated on-site from testing operations as well. Anodyne's spent process solutions and static dragout rinses are treated in a batch treatment system or hauled offsite. Dilution wastestreams are either reused as rinsewater in operations or discharged downstream of the sampling point. Additionally, there is a closed loop cadmium cyanide recycling system and a continuous metals treatment system. Conventional best available treatment (BAT) is practiced on-site using sodium sulfamate, ferrous sulfate, sodium metabisulfite, sulfuric acid, and sodium hydroxide. Lamella clarification and final neutralization is used in continuous treatment. Hauled waste



includes filter cake, electroless nickel and nickel boron, as well as cadmium and cyanide spent solutions and ion exchange tanks.

July 1 – December 31, 2022

Anodyne had no violations during this reporting period.

January 1 – June 30, 2023

A fire occurred on March 26, 2023, causing Anodyne to cease their operations. The fire severely damaged the building housing a portion of their metal finishing operations, leaving several structural components beyond repair.

In April 2023, in response to this event, Anodyne submitted a proposal outlining their plan to restart anodizing operations, which were to be relocated to an adjacent building unaffected by the fire. On April 27, 2023, OC San issued a compliance requirement letter in response to Anodyne's proposal, specifying additional documentation requirements including a Toxic Organic Management Plan, Operations and Maintenance Manual, Slug Discharge Control Plan, pretreatment drawings, process flow drawings, site plan drawings, tank schedule, chemical list, and a proposal for the installation of the two new process meters.

On June 14, 2023, OC San subsequently issued another compliance requirement letter, accepting the proposal after receiving and reviewing the requested documents. Anodyne was required to notify OC San one week before resuming discharge, maintain a batch discharge log, and conduct weekly sampling for copper, chromium, nickel, zinc, cadmium, lead, silver, and total cyanide. In line with these requirements, Anodyne informed OC San on June 28, 2023, of their intention to commence discharge operations during the next reporting period.

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

**Anomil Ent. DBA Danco Metal Surfacing (Permit No. 1-011155)**

Anomil Ent. DBA Danco (Danco) performs dry and wet surface finishing of customer-supplied parts made of aluminum and stainless steel. Parts are primarily used in aerospace, automotive, commercial, consumer, industrial, medical, military/defense, and recreational applications. Danco is classified as a job shop as it provides a service to industry and own less than 50% of the parts. Daily production is dependent on jobs and specifications and may vary day to day.

The facility specializes in the following wet operations: anodizing, caustic etch, deoxidation, chem-film, color dyeing, finishing (ARP for frost finish or ammonium bifluoride for dull finish), sealant (nickel acetate or hot D.I.), alkaline cleaning, and passivation (stainless steel parts). All wet operations are conducted manually using basket, rack, or wire process techniques. Solvent (acetone) based demasking occasionally concludes the process operations. Supporting dry operations without wastewater include polishing, surface masking (dry or lacquer), buffing, hole plugging, line graining, and glass bead blasting.

The effluent discharge at Anomil is generated by spent process solutions and the associated rinse wastestreams. Wastewater is processed through ion exchange for chrome removal, hydroxide precipitation, clarification tanks, and pH neutralization. The sample point is an above ground box with a continuous pH chart recorder.

July 1 – December 31, 2022

Danco had no violations during this reporting period.

January 1 – June 30, 2023

In January 2023, Danco had a monthly limit violation for Nickel for which an NOV was issued on April 4, 2023. OC San will continue enforcement during the next reporting period and continue to monitor Danco's discharge and compliance status on a quarterly basis.

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

APCT Orange County (APCT OC) specializes in prototype, quick turn, and semi-production orders. The manufacturing operations begin by generating film photo-tools. Production of the typical multilayer board begins by cutting the copper clad and pre-preg materials, photoresist application, inner-layer circuit imaging, photoresist developing, ammonium etching, alkaline resist stripping, and automatic optical inspection (AOI). This is followed by surface preparation, lamination, and drilling. Outer-layer circuit development proceeds by either panel-plate or pattern-plate process steps. Panel-plate boards undergo copper plating followed by photoresist application, circuit imaging, photoresist developing, and ammonium etching. Pattern-plate boards undergo photoresist application, circuit imaging, resist developing, and copper plating. The pattern-plate boards are then sent offsite for tin/lead plating and brought back onsite for ammonium etching and tin resist stripping. After resist stripping, the boards undergo a second AOI inspection, followed by 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.

The effluent discharge at APCT OC is generated by aqueous fume scrubbing, the various spent process solutions, and the associated rinse wastestreams. APCT OC employs ion exchange, batch treatment, and pH adjustment to treat all wastewater generated prior to discharge to the sewer.

#### **July 1 – December 31, 2022**

On September 9, 2022, APCT OC had a copper violation for exceeding the daily average loading limit for which an NOV was issued on December 15, 2022.

#### **January 1 – June 30, 2023**

On March 22, 2023, APCT had two sampling events (one SMR and one OC San) with instantaneous, daily average, and daily loading average limit violations for copper, for which NOV's were issued for each on May 1 and May 2, 2023, respectively. A compliance inspection was conducted on May 9, 2023, to investigate the root cause of the violations. During the inspection, APCT explained that it had discovered that its filter press had sludge build-up on the cloth that potentially resulted in the discharge of small amounts of sludge over time to tank SIX-T2, which discharges directly to the sample point. The sludge has been cleaned off, and APCT has begun to implement maintenance procedures to check the filter press more often. As a follow-up, OC San issued a compliance requirements letter, requiring APCT to submit a corrective action plan.

APCT submitted proposal on June 21, 2023, to cut and cap the discharge line going from their filter press to tank SIX-T2, preventing sludge from going into tank SIX-T2 and ultimately the sample point. In addition, the "off-spec return" discharge line coming from the filter press would be replumbed to tank WT-T2 instead of tank BT-T1, allowing wastewater coming from the filter press to go through additional treatment prior to discharge. OC San has reviewed this proposal, has drafted a response to the proposal, and will finalize during the next reporting period.

OC San issued an NOV on June 5, 2023, for the monthly copper exceedance during the month of March 2023.

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

### **ARO Service (Permit No. 1-021192)**

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

#### July 1 – December 31, 2022

On August 9, 2022, ARO had copper and zinc violations, for which an NOV was issued on August 30, 2022. On October 5, 2022, OC San conducted a compliance inspection to investigate the root cause for the copper and zinc violations. At the time of inspection, ARO attributed the violations to inadequate rinsing. Separately, ARO reported a process tank overflow causing the metals violations from December 2021.

On November 1, 2022, OC San issued an NOV for August's copper and zinc monthly average violations. On November 3, 2022, OC San issued a compliance requirement letter to ARO to attend a compliance meeting. During the compliance meeting held December 15, 2022, ARO cited operator error, equipment deterioration, and containment sump discharge design, as contributing factors to the recent violations. In response, ARO updated employee training, adjusted the spray nozzle rinse patterns, and rerouted plumbing from the containment sump to a collection tank. ARO instructed facility personnel to routinely test the collection tank contents to determine the appropriate method for disposal. Despite the corrective actions implemented, the risk remains that concentrated wastewater may discharge to the existing batch treatment system and cause non-compliance issues. Therefore, ARO will be required to submit a proposal to integrate pretreatment technology equivalent to or better than Best Available Technology.

#### January 1 – June 30, 2023

On February 6, 2023, OC San issued a compliance requirement letter that directed ARO to submit several compliance documents by April 14, 2023, including a proposal to integrate pretreatment technology equivalent to or better than BAT, waste characterization, updated system drawings, and an updated operations and maintenance manual. On April 11, 2023, ARO requested an extension, to which OC San accepted the request and amended the submittal deadline to June 2, 2023. On June 28, 2023, OC San issued a NOV to ARO for failure to submit required drawings and information by the June 2, 2023, deadline. OC San notified ARO the requirements are past due and must be submitted during the next reporting period.

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

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

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

#### July 1 – December 31, 2022

OC San issued an NOV on January 5, 2023, for the monthly fluoride violation in October 2022. On August 16, 2022, Arrowhead had fluoride and zinc daily limit violations, for which an NOV was issued on September 13, 2022. On October 4, 2022, OC San issued an NOV for the ammonia monthly limit violation in July 2022. On September 14, 2022, Arrowhead had a fluoride daily limit violation, for which an NOV was issued on October 27, 2022. Arrowhead reported additional fluoride self-monitoring violations on September 21,

September 22, October 5, and October 6, 2022, for which four NOV's were issued on November 1, 2022. On October 5, 2022, Arrowhead had another fluoride violation, for which an NOV was issued on November 8, 2022. On October 6, 2022, OC San conducted a pre-permit inspection at Arrowhead and discussed the chronic nature of the fluoride violations at the facility. Arrowhead notified OC San of a fluoride study that the company had conducted to investigate the recent fluoride violations. On November 8, 2022, OC San issued two NOV's, one for the monthly limit exceedances for fluoride and zinc in August 2022 and one for the daily limit violation for fluoride October 5, 2022. On December 8, 2022, OC San issued an NOV for the monthly limit exceedance of fluoride in September 2022. On November 1, 2022, Arrowhead had a fluoride daily limit violation for which an NOV will be issued during the next monitoring period.

#### January 1 – June 30, 2023

Arrowhead had a fluoride violation on November 1, 2022, for which an NOV was issued on January 1, 2023. OC San issued a compliance requirement letter on January 17, 2023, requiring Arrowhead to attend a compliance meeting. During the compliance meeting on February 2, 2023, Arrowhead presented a corrective action timeline that chronicled their wastewater treatment activities. Using the corrective action timeline, Arrowhead correlated some of the violations to on-going continuous improvement of their wastewater treatment system as well as specific events that lead to the wastewater treatment system not functioning correctly around the same time as the violations. A fluoride study from November 2022 was also discussed which analyzed the fluoride contribution from the non-categorical wastewater generating processes and potential point source treatment options for fluoride for these processes. As a result of the compliance meeting, OC San issued a compliance requirement letter on March 22, 2023, requiring Arrowhead to submit the following items to OC San: a wastewater characterization report for fluoride, a proposal to ensure adequate treatment of all generated wastestreams, and bi-weekly progress reports to inform OC San of the work completed on wastewater related activities. In addition, Arrowhead's permit was revised to increase the monitoring frequency of fluoride to weekly.

Arrowhead submitted the fluoride wastewater characterization report on April 21, 2023, with an addendum submitted on June 12, 2023.

Arrowhead submitted proposals on April 5 and June 7, 2023 to install a temporary batch treatment system, proposing to temporarily re-plumb all discharged wastewater coming from their facility into a series of three tanks prior to discharge into the sewer. A submersible pump recirculates the wastewater within each tank to allow for adequate mixing and representative sampling. At the end of a typical production day, the wastewater in each tank will be sampled and tested for fluoride. Wastewater that is compliant with Arrowhead's discharge limits will be discharged to the sewer, whereas wastewater that is not in compliance with the discharge limits will be wastehauled. OC San issued a compliance requirements letter on June 9, 2023 accepting this proposal and requiring Arrowhead to provide bi-weekly progress reports and submit a proposal to OC San by September 2023, to ensure long-term compliance with all discharge limits.

OC San issued an NOV on April 21, 2023, for the monthly loading limit violation for ammonia in January 2023.

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

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

B. Braun Medical, Inc. (West/Lake) (B. Braun West) manufactures pharmaceutical intravenous (IV) fluid and the packaging for the fluid. The majority of the IV solutions are either dextrose or sodium based. The manufacturing process includes mixing, filling, sterilization, and packaging of aqueous injectable and parenteral pharmaceutical products. The facility employs a blow-molding process line that forms the IV bag units where single-piece plastic containers are blow-molded and filled in a room along a process conveyor belt. The packages are sprayed and bath-sterilized before they are placed on pallets and collected for shipment. Operations contributing to wastewater generation include forming of plastic containers and extruding plastic films for IV bags, mixing/blending of IV solutions, filling IV bags with solution, sterilizing manufactured products; and preparing products for shipment. Waste from the sterilization process consists

of condensate that accumulates on the packages during the cooling process, and the water drained weekly from the heat exchangers.

The primary sources of wastewater are generated from the steam sterilization equipment and an IV bag crushing machine located in an outdoor reclamation area. The IV bag crushing machine separates the liquid contents from plastic IV bags that did not meet the facilities stringent quality control standards. Wastewater from the IV bag crushing unit operations gravity drain through a steel grated catch basin, which separates the IV solutions from the shredded plastic. Once drained, the shredded plastic containers are collected and transported for offsite recycling. The IV bag crushing machine wastewater gravity drains through the catch basin and undergoes pH adjustment with 50% sodium hydroxide. Following the pH adjustment step, this wastewater gravity drains and combines downstream with the steam sterilization and other wastewater streams from the blow-molding process line prior to discharge.

#### July 1 – December 31, 2022

On June 20, 2022, B. Braun West had a pH violation for which an NOV was issued on July 12, 2022. Following issuance of the NOV, B. Braun West submitted a corrective action report to address the root cause of the pH violation. B. Braun West attributed the violation to a low flow condition which concentrated the sodium hydroxide in the discharge from the pH adjustment system. As a corrective action, B. Braun West proposed increased monitoring and integration of the pH adjustment system to the main control room, installation of alarms, and set point control for pH. On July 27, 2022, OC San conducted a follow-up inspection and resampling to verify the effectiveness of the increased monitoring. The resampling results demonstrated compliance with pH limits. On November 14 and 15, 2022, B. Braun (West) had two pH violations on consecutive days for which an NOV will be issued during the next reporting period.

#### January 1 – June 30, 2023

On January 10, 2023, OC San issued an NOV for the November 2022 pH violations. OC San conducted a compliance inspection on January 18, 2023, to investigate the root cause of the pH violations, to collect a resample, and to discuss the violations with facility personnel. During the inspection, OC San noted that the pH probe readings at the control panel varied significantly from pH measurements collected by OC San at the sample point. Resample results showed compliant levels for pH. B. Braun stated that the system pH probe, which is installed just upstream of the effluent flow meter, was recently replaced following the pH violations in November 2022. On February 7, 2023, OC San issued a compliance requirement letter requiring B. Braun to attend a compliance meeting. On March 9, 2023, OC San held a compliance meeting with B. Braun during which they identified a lack of automation and monitoring of the pH adjustment system as the probable cause of the recent pH violations. To maintain long-term compliance, B. Braun implemented the following corrective actions: (1) integrated the existing pH controller and probe with the caustic dosing pump to allow for automatic control of caustic dosing, (2) increased monitoring and preventative maintenance of the system by facility personnel, and (3) procured spare parts to address future equipment malfunctions. On April 27, 2023, OC San issued a compliance requirement letter requiring B. Braun to submit a proposal detailing the upgrades to the pH adjustment system, including plans and specifications and provide updated facility drawings and plumbing plans. On June 30, 2023, B. Braun submitted their proposal to OC San for system upgrades, which is currently under review and evaluation.

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

#### **Baxter Healthcare Corporation (Permit No. To be issued)**

Baxter Healthcare Corporation (Baxter) manufactures medical devices used for patient and hospital care. The facility assembles infusers that deliver medications to patients at a prescribed flow rate. The infusers consist of a plastic cover, rubber bladder, and flow restrictor. The facility manufactures the rubber bladder via a compounding process followed by an extrusion process. In the compounding process, supplied rubber is extruded into a thin rubber rope. The rubber rope is cooled in a water trough before being fed into a mixer where additives are blended and heated to the desired temperature and composition. Water in the cooling trough is treated with UV light and recirculated. The proprietary rubber from the compounding process is fed into the extrusion process where the rubber rope is extruded into a rubber tube. The rubber tube is then

cured in a molten bath. The extrusion line is equipped with a spray rinse tank that cools the rubber tube and rinses particulates. The rubber tube is then cut using a shear into the final rubber bladder used in the infusers. Metal flow restrictors are produced in a needle cutting operation with produces needles from long steel cannula tubes using a Dremel tool. The needles are then cleaned in an alcohol reservoir prior to final assembly. The final assembly for the infuser is performed using the rubber bladder, plastic cover and flow restrictor prior to shipment offsite. Wastewater is primary generated from the compounding and extrusion processes as well as RO reject.

July 1 – December 31, 2022

Baxter had no violations during this reporting period.

January 1 – June 30, 2023

During the pre-permit inspection on May 3, 2023, OC San observed that the Baxter facility lacked a single accessible sample point where a representative sample could be collected. On May 15, 2023, OC San issued an NOV which required Baxter to provide a proposal for a representative sample point. On June 30, 2023, Baxter submitted their proposal to establish a representative sample point. OC San will evaluate Baxter's proposal and continue enforcement during the next reporting period.

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

**Beverage Visions LLC (Anaheim) (Permit No. 1-601448)**

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, and boiler blowdown discharge to a three-stage clarifier, a final discharge compartment, 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, 2022

On July 7, 2022, OC San completed a resample for pH that occurred in the previous reporting period, which resulted in another pH violation. On July 20, 2022, Beverage Visions submitted a correction action summary in response to the pH violations in June. The facility attributed the violations to faulty equipment and a general lack of oversight. In response, Beverage Visions replaced the pH adjustment system's preamplifiers and pH probes, implemented biweekly pH probe calibration, instituted hourly monitoring, and documented their actions accordingly. Separately, Beverage Visions notified OC San that they had sold the facility. Therefore, the permit was subsequently voided, and a new permit was issued to the new occupant, Koia Anaheim Facility, LLC. An NOV was issued on July 26, 2022, for the pH violation that occurred on July 7, 2022; however, no further enforcement action will be taken against Beverage Visions, LLC (Anaheim).

January 1 – June 30, 2023

The permit was void and Beverage Visions had no violations during this reporting period.

**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, 2022

Bioduro Jeronimo had no violations during this reporting period.

January 1 – June 30, 2023

In April 2023, Bioduro Jeronimo had an acetone monthly discharge limit violation for which an NOV will be issued during the next reporting period. In May 2023, Bioduro Jeronimo had a methylene chloride monthly discharge limit violation for which an NOV will be issued during the next reporting period.

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

**Black Oxide Industries, Inc. (Permit No. 1-021213)**

Black Oxide Industries, Inc. (Black Oxide) performs metal finishing and surface treatment to steel, stainless steel, aluminum, copper, and brass parts provided by customers. Operations include surface preparation and cleaning, black oxide, manganese and phosphate coating, chemical black application, passivation, and post metal coating with oil and carnauba wax. Black Oxide utilizes a continuous and a batch treatment system. Black Oxide discharges rinsewater to the continuous pretreatment system for pH adjustment, polymer addition, and sedimentation, with the exception of two running rinses which discharge to a separate collection tank for pH neutralization then discharge directly to the sample point and sewer. Black Oxide batch treats spent process solutions as necessary. The facility utilizes a filter press for phase separation and returns the filtrate to the start of the continuous treatment train for supplemental treatment.

July 1 – December 31, 2022

On November 15, 2022, Black Oxide had a pH violation, for which an NOV was issued on December 1, 2022.

January 1 – June 30, 2023

On February 2, 2023, OC San conducted a compliance inspection to investigate the pH violation that occurred in the previous reporting period. At the time of inspection, Black Oxide submitted a corrective action report that indicated the acid metering pump's stroke setting was incorrect, which resulted in an overdose of sulfuric acid to the rinse collection tank. In response, the facility returned the setting to its correct position, verified all other process control equipment was set correctly, then conducted hourly pH monitoring for six days to confirm that the corrective measures resolved the issue. In addition, Black Oxide installed a glass cover and padlock to restrict access to the process control equipment settings, installed a new digital controller with set point alarms, and updated employee training.

After review of the corrective action report submitted by Black Oxide, it was determined that no further enforcement actions were required at this time. Black Oxide had no violations during this report period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

**Brasstech, Inc (Permit No. 1-600316)**

Brasstech, Inc.'s (Brasstech) operations consist of electroplating, coating, and chemical etching. Ancillary operations include scrubber bleed, cleaning, and laboratory testing. Dry operations include vapor plating under vacuum, miscellaneous machining operations, brazing/welding, and painting operations.

There are three process lines for electroplating with non-precious metals including nickel and trivalent chrome, oxide, and stripping for reworked parts. Brasstech uses trivalent chromium with no hexavalent chromium kept onsite. Products are all brass-based alloys, where copper and zinc ratios are adjusted for hardness. Other metals may be combined to adjust for machinability, corrosion, or other physical and chemical properties including aluminum, lead, and arsenic.

Wastewater treatment includes segregated wastestreams for chrome, nickel, and batch lines. Rinse water is recycled where possible through cation and anion exchange tanks, while ion exchange regenerant is batch treated and discharged. Treatment includes wastestream equalization, hydroxide precipitation, flocculation, thickening, filter press, and pH adjustment. Each batch is jar tested, checked for compliance, and logged prior to discharge. There is multiple conductivity, pH, and ORP meters for use with the programmable logic controller.

July 1 – December 31, 2022

On September 1, 2022, OC San issued an NOV for the zinc monthly exceedance that occurred in month of June 2022.

January 1 – June 30, 2023

OC San received a corrective action report on March 2, 2023, regarding the monthly average limit violation for zinc observed in June 2022, indicating that Brasstech suspected zinc from the brass spigot on the sampling tank. The brass spigot on the sampling tank was subsequently replaced with a CPVC spigot in July 2022. Brasstech had no violations during this reporting period.

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

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

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

July 1 – December 31, 2022

Brea Power had no violations during this reporting period.

January 1 – June 30, 2023

On February 28, 2023, Brea Power had a pH violation for which an NOV was issued on March 16, 2023. On March 30, 2023, OC San conducted a compliance inspection at Brea Power to collect a resample, at which time the facility was in the process of investigating the root cause of the pH violation. Resample results showed compliant levels of pH. On April 25, 2023, Brea Power submitted their corrective action report to OC San which attributed the pH violation to a malfunction of the caustic dosing system which has since been restored to normal operation. In the report, Brea Power proposed installation of an integrated system to allow for real-time continuous pH monitoring as a long-term corrective action. Brea Power is currently implementing this corrective action, which is projected to be completed during the next reporting period.

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

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

Brothers International Desserts (West) (Brothers West) is an ice-cream and frozen novelty manufacturer. Most of the wastewater is generated by the cleaning and sanitizing of equipment used for the manufacturing processes. Wastewater generated on site is treated by a pH adjustment system before discharge to the sewer.

In April 2022, Brothers West had a pH violation, for which an NOV was issued in the same month. Brothers West submitted their corrective action report attributing the root cause of the pH violation to a malfunctioning sensor on the pH adjustment system. Brothers West further stated that the malfunctioning sensor failed



due to poor materials of construction. As a corrective action, Brothers West upgraded to a more robust pH sensor and a digital gateway better suited for their application. Brothers West also implemented hourly pH testing of their wastewater with a handheld instrument to confirm compliance prior to discharge.

#### July 1 – December 31, 2022

On July 11, 2022, OC San conducted a compliance inspection in conjunction with a pre-permit inspection to verify the installation status of new equipment on-site and its effectiveness on the pH adjustment. The equipment appeared to be in good condition and the sample showed compliance with pH limits.

#### January 1 – June 30, 2023

Brothers West had no 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 Brothers West's discharge and compliance status on a quarterly basis.

#### **CalNRG Operating, LLC (Permit No. 1-601486)**

CalNRG Operating, LLC (CalNRG) extracts crude oil and groundwater from four production wells. The facility pumps extracted contents to a wash tank for density separation. CalNRG retains the crude oil in several stock tanks and discharges the groundwater to the sewer through a multi-stage clarifier, a filter, and two granulated activated carbon vessels.

#### July 1, 2022 – December 31, 2022

CalNRG had no violations during the reporting period.

#### January 1, 2023 – June 30, 2023

On January 12, 2023, CalNRG had instantaneous and daily average O&G min. violations, for which an NOV was issued on January 31, 2023. On February 14, 2023, OC San conducted a compliance inspection at CalNRG to investigate the cause for the O&G-min. violations. On February 21, 2023, CalNRG submitted a corrective action report which attributed the violations to inadequate extraction well maintenance. The facility indicated that an extraction well suffered an electrical failure on January 9, 2023. On January 11, 2023, the facility returned the well to service, which resulted in a surge of crude oil and groundwater, impacting density separation in the wash tank. As a corrective action, CalNRG will route all contents to a holding tank to promote stabilization following any future well maintenance activity.

Cal NRG had no additional 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 CalNRG'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 requirement 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 requirement 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 requirement 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.

#### July 1 – December 31, 2022

OC San continues to review Cargill's proposal 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.

#### January 1 – June 30, 2023

On January 18, 2023, OC San conducted a compliance inspection to review Cargill's current stormwater practices. During the inspection, OC San revisited the areas that were identified as sources for stormwater intrusions. At the time of the inspection, the diversion valves were directed to the wastewater collection basin as cleanings were in progress; however, Cargill confirmed that valve positions default to discharge to the local storm drain. OC San also inspected the rail track and east truck loading area. At the rail track, OC San observed four (4) drains, in addition to the drip pans on the track, that may collect stormwater. Cargill mentioned that the rail track sump pit is pumped manually prior to rain events, and Cargill does not initiate any transfers during storm events. At the east truck loading area, OC San observed a sump at each loading dock that discharges to a lift station prior to discharging to the wastewater collection basin. On February 6, 2023, OC San issued a compliance requirement letter as a response to Cargill's March 31, 2022 proposal. OC San accepted Cargill's proposal to operate diversion valves for the Truck Loadout Area, West Tank Farm Area, East Tank Farm Area, Refinery Area that will normally discharge to the stormwater collection basin, to plumb blowdowns from the boilers directly to the West Basin, and to cap all sanitary sewer drains and reroute all downspouts at the NW Terminal Building Road and Alley area. OC San required Cargill to implement a system for easy visual identification of valve position by February 28, 2023. OC San also required Cargill 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 by February 28, 2023. On February 28, 2023, Cargill requested an extension to implement the signs by March 31, 2023, an extension to reconfigure the valve configuration for the trench drain until the completion of the boiler installation on September 30, 2023, and an extension to reposition the valves at the East Tank Farm area to February 28, 2024, as upgrades to their electrical and steam tracing systems are needed. Cargill also requested an extension to submit a proposal to mitigate stormwater at the rail track and the east truck loading area by August 31, 2023. During a routine inspection on June 26, 2023, OC San observed that signs were implemented for two of the valves. OC San is currently reviewing Cargill's extension request and will respond during the next reporting period.

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

#### **Chevron EMC (Brea Union Plaza) (Permit No. S-052225)**

Chevron EMC (Brea Union Plaza) (Chevron EMC) is an SPDP that has been active since 2004. The discharge consists of groundwater dissolved with nitrate (as NO<sub>3</sub>) extracted from the former Union Oil Company of California (Unocal) Collier Fertilizer plant which has been redeveloped as the Birch Hills golf course and Brea Union Plaza shopping center. Groundwater is pumped directly to the discharge point from several extraction wells. There is no pretreatment of the extracted groundwater prior to discharge.

#### July 1 – December 31, 2022

On August 1, 2022, OC San issued an order to terminate discharge without a valid permit since the Chevron EMC permit No. S-052225 expired on July 31, 2022, and no permit application to renew the permit was submitted to OC San. Chevron EMC submitted their SPDP renewal application on September 14, 2022, and their permit was subsequently issued on November 1, 2022.

#### January 1 – June 30, 2023

Chevron EMC had no 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 Chevron EMC's compliance status on a quarterly basis.

#### **Chromadora, Inc. (Permit No. 1-511414)**

Chromadora, Inc. (Chromadora) is a medium-size plating job shop that specializes in decorative chrome finishing. The finishing of a typical wheel begins offsite at an outside paint stripping service that provides organic coating removal. The wheel is then transferred to Chromadora's offsite location for polishing to provide a smooth unblemished surface. Once onsite, the wet surface finishing proceeds with alkaline and acid cleaning, to remove any residue and oxidation, followed by the application of a zincate film to prevent the aluminum surface from oxidizing prior to metal plating. Next, the wheel receives copper plating followed by manual buffing. A soap cleaning step removes any traces of buffing compound followed by electrocleaning, bright nickel plating, and finally chrome plating which completes the wet finishing operations. The wastewater discharge at Chromadora is generated by the various spent process solutions and the associated rinse wastestreams.

In April 2021, OC San conducted a multi-sampling event (24-hr composite and grab samples) in the Talbert Trunk, immediately downstream of Chromadora which resulted in violations of chromium, copper, nickel, and zinc.

#### July 1 – December 31, 2022

On June 9, 2022, Chromadora had a TTO violation for which an NOV was issued on July 12, 2022. OC San conducted a compliance inspection on August 1, 2022, to determine the root cause of the violation. After reviewing site operations with the site contact, Chromadora determined that staff rinsed some rags used for paint and solvent clean-up and discharged the water into a rinse tank routed to the treatment system and sewer. Chromadora confirmed that there are no other sources of TTOs at the facility and they have trained staff on appropriate waste management practices and BMPs.

#### January 1 – June 30, 2023

Chromadora had no 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 Chromadora's discharge and compliance status on a quarterly basis.

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

The City of Huntington Beach Fire Department (HB Oil) produces crude oil from three wells located on municipal property. Crude oil is separated from brine via gravity in a wash tank. Crude oil is held in a separate tank for shipment to refineries. Separated water then flows through a three-stage clarifier, sample box, and then to the sewer.

#### July 1 – December 31, 2022

On August 15, 2022, OC San conducted a site inspection at the HB Oil to verify the facility was no longer discharging industrial wastewater. On August 29, 2022, OC San received a close of account form from HB Oil for closure of the Class 1 Wastewater Discharge Permit. As a result, OC San issued an order to terminate discharge on September 6, 2022, confirming the permit was voided.

January 1 – June 30, 2023

HB Oil had no violations during this reporting period.

**City of Westminster (Permit No. S-053238)**

City of Westminster is an SPDP for the treatment and discharge of groundwater generated from a site remediation project located at the City of Westminster's corporation yard. Groundwater treatments consists of filtration, carbon adsorption, and clarification prior to sewer discharge.

July 1 – December 31, 2022

On September 6, 2022, OC San issued an order to terminate discharge without a valid permit provided Permit No. S-053238 expired on August 31, 2022, and OC San had not received a permit renewal application. On October 14, 2022, the City of Westminster submitted their SPDP renewal application, and their permit was subsequently issued on December 1, 2022.

January 1 – June 30, 2023

City of Westminster had no 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 City of Westminster's discharge and compliance status on a quarterly basis.

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

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

Coast to Coast treats low concentration rinse waters using an ion exchange system and recycles the treated water back to process tanks. Concentrated process solutions are segregated and treated in an automatic batch treatment system. The automatic batch treatment system consists of one surge tank, a sump, two holding tanks, and two treatment tanks. The system is also equipped with automatic pH and ORP control and uses coagulant, precipitant, and flocculant. The remaining wastewater with negligible or no pollutant concentration levels is routed to the clarifier for pH adjustment prior to discharge to the sewer. As a result of a probation order issued in June 2020, Coast to Coast is required to complete installation of a pH diversion valve system, new clarifier, and effluent flow meter.

As a result of a pH violation, multiple compliance deficiencies, and failure to comply with subsequent compliance requirement letters, Coast to Coast was issued a probation order in June 2020. From August to December 2020, after multiple revisions to compliance requirement proposals, multiple meetings with Coast to Coast, and a copper violation, OC San accepted the proposed changes to the facility. However, Coast to Coast failed to install the proposed pretreatment system and process modifications as accepted by OC San. As a result of a copper violation in March 2021 and continued noncompliance, OC San issued a compliance requirement letter in May 2021, requiring Coast to Coast to complete outstanding probation order requirements.

July 1 – December 31, 2022

On September 2, 2022, OC San issued a compliance requirement letter requiring Coast to attend a compliance meeting. At the compliance meeting on October 12, 2022, Coast informed OC San that the updated process and piping drawings are currently being prepared and preliminary drafts should be available in the coming weeks. Upon review of the submitted documentation, it was determined that the flow meter as installed is not accepted by OC San. On October 20, 2022, OC San issued a post-compliance requirements letter to Coast directing the company to submit a proposal for the installation of an effluent flow meter installed downstream of all process and pretreatment equipment (including the clarifier) by

November 15, 2022, and after acceptance by OC San, complete installation and submit final as-built drawings by the next reporting period. In November 2022, Coast had a monthly exceedance of copper, for which an NOV will be issued in the next reporting period.

#### January 1 – June 30, 2023

The Coast proposal for the effluent meter installation was accepted on January 10, 2023. Updated drawings and pretreatment information were received with the permittee's renewal application on March 3, 2023. However, the permittee was not able to confirm accuracy of flow meter installation and has continued to have equipment issues which resulted in a pH violation on April 13, 2023.

On November 17, 2022, Coast had copper daily limit and any time maximum violations, for which an NOV was issued on March 10, 2023. OC San also issued an NOV on March 10, 2023, for the copper monthly average discharge limit violation in November 2022. Coast identified the cause of the exceedance as solids in the sample box.

OC San issued a compliance requirement letter on January 9, 2023, accepting Coast's proposal for the installation of an effluent flow meter. During this time, Coast also installed a new sample box downstream of the clarifier. Updated drawings and pretreatment information were received with the permittee's renewal application on March 3, 2023. Nevertheless, the permittee was not able to confirm accuracy of flow meter installation and has continued to have equipment issues which resulted in a pH violation of 12.65 Standard Units on April 13, 2023, for which an NOV was issued May 2, 2023. As a result of the pH value, the discharged wastewater was characterized as hazardous waste and OC San issued an NOV on May 25, 2023, for violating the prohibition against discharge of hazardous waste to the sewer. Calibration of equipment was believed to be the issue and has been since corrected by Coast.

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

#### **Coastline Metal Finishing Corp. A Division of Valence Surface Technologies (Permit No. 1-600708)**

Coastline Metal Finishing Corp. A Division of Valence Surface Technologies (Coastline) is a medium size metal finishing job shop for a wide variety of customers in the electronics, medical, aerospace, military, defense, and optical industries. Operations includes alkaline cleaning, caustic etch, precious metals electroplating, nickel plating, anodizing, chemfilm, dyeing, passivation, pickling, and tin/tin-lead electroplating. Coastline has three close looped ion exchange systems for removal of nickel, tin-lead, chrome, precious metals and cyanide from the rinse streams. The discharge at Coastline consists primarily of selected running rinses that are discharged to equalization tanks and then to the sewer without any pretreatment.

In October 2021, as a result of a compliance inspection and issuance of a compliance requirement letter, Coastline was required to immediately cease the practice of running rinses without parts being processed and to provide a proposal to implement effective flow control through the rinse tanks. In November 2021, Coastline provided a proposal to install conductivity meters on the rinse tanks and submitted a revised proposal in February 2022 to install a tank control system that utilizes a conductivity meter to turn on/off a solenoid valve to control water usage. Coastline proposed to install these systems in phases and estimated to have the system installed on all running rinses within a year. In the interim, Coastline proposed to implement manual logs to document valve closures for the running rinses. In May 2022, OC San accepted Coastline's proposal. OC San extended the implementation schedule deadline due to delays in Coastline obtaining the necessary equipment to install and test.

In March 2022, Coastline had a pH violation. Coastline attributed the pH violation to a miscommunication between their operators, where operators did not run caustic rinses while running the anodizing rinses. In April 2022, Coastline had another pH violation. In May 2022, Coastline submitted a proposal to install an automatic pH adjustment and monitoring system with audio and visual alarms. As an immediate corrective action for the pH violation, Coastline had installed the automatic pH adjustment system prior to OC San acceptance of Coastline's proposal.

#### July 1 – December 31, 2022

Coastline had additional delays in obtaining the correct parts and equipment for the automatic tank control system. Installation for the first three systems was completed on October 18, 2022. OC San extended the implementation schedule deadline to November 30, 2022, to provide sufficient time for Coastline to test the effectiveness of the system and to gather information for the implementation schedule. On December 16, 2022, Coastline submitted the implementation schedule.

During this reporting period, OC San reviewed logged pH data from Coastline's implemented system to evaluate the effectiveness of the automatic pH adjustment system.

#### January 1 – June 30, 2023

OC San reviewed Coastline's implementation schedule and observed that there are several running rinse tanks that were not included in their implementation schedule. OC San requested clarification on these tanks on January 31, 2023. On February 7, 2023, Coastline provided their response and will add these tanks to their schedule. Coastline experienced significant delays in obtaining the conductivity meters due to backorders in parts from their vendor. Coastline is expecting their next set of conductivity meters to arrive in August 2023.

On March 6, 2023, OC San issued a compliance requirement letter to respond to Coastline's pH adjustment system proposal. OC San had concerns that the system may not be effective in achieving long-term compliance as Coastline's logged pH data showed multiple excursions below pH of 6. Additional concerns include insufficient retention time, inadequate mixing and that non-compliant wastewater cannot be recycled and retreated. OC San required Coastline to provide a revised proposal to address these concerns by March 31, 2023. Coastline requested an extension to submit the proposal and the revised implementation schedule by May 1, 2023. On May 4, 2023, Coastline submitted their proposal for the revised pH adjustment system, proposing to move the chemical dosing to be in-line with the process piping for additional mixing, adding the requirements for operator to shut off sump pump and close the shut off valve on the effluent line during alarms, and to move the low point alarm set point to 6.5. OC San reviewed the submitted proposal and continued to correspond with Coastline to clarify aspects of the proposal. OC San required Coastline to submit a revised proposal in the next reporting period.

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

#### **CP-Carrillo, Inc. (McGaw) (Permit No. 1-571316)**

CP-Carrillo, Inc. (CP-Carrillo) manufactures original equipment steel connecting rods and aluminum pistons used in high performance racing applications. The products, which are designed in-house, are manufactured primarily with CNC (computer numerical control) machines on site. The company has another facility nearby for machine shop support.

Wastewater is generated from the cleaning, tumbling, and deburring of engine parts comprised of aluminum, steel, brass, and chrome. The pretreatment system at CP-Carrillo consists of a batch tank which collects sludge and water from the cleaning, tumbling, and deburring of engine parts comprised of aluminum, steel, brass, and chrome. The batch tank drains to a conveyor belt paper filtration system. As the paper filter collects solids, wastewater drains through the belt into a sump collection. When enough solids/foam accumulate on the filter paper a float is engaged to advance the paper forward into a collection bin, collecting the used paper for waste-hauling and pulling fresh paper out for the next amount of sludge filtration. The sump collection flows into another sump collection compartment, before the wastewater is pumped through a cartridge filter assembly and then into the wall-mounted sample box that gravity drains to the sewer. The sample box is configured with baffles to promote settling and ports for box cleaning and sample collection.

#### July 1 – December 31, 2022

On June 13, 2022, CP Carrillo, Inc (McGaw) had an instantaneous and a daily maximum exceedance O&G-min., for which an NOV was issued on July 7, 2022. On August 1, 2022, CP Carrillo, Inc. (McGaw) submitted

their corrective action report citing the source of the O&G-min. violation to a delayed filter replacement. The in-line filter is installed prior to the batch collection tank to remove oil residues from wastewater prior to discharge. Corrective actions identified by CP Carrillo, Inc. (McGaw) in the report included training of all supervisors and maintenance staff on the routine two-week filter replacement; establishing a maintenance log for filter replacements including date, time, and individual performing the task; and increasing the inventory of spare filters available at the facility. On September 8, 2022, CP Carrillo Inc. (McGaw) had a copper violation, for which an NOV was issued on September 27, 2022. On October 19, 2022, OC San conducted a compliance inspection to investigate the root cause of the copper violation and to verify corrective actions from the previous O&G-min. violation had been implemented. CP Carrillo, Inc. (McGaw) attributed the copper violation to a buildup of solids in the batch tank and associated piping caused by poor maintenance. On November 4, 2022, CP-Carrillo (McGaw), Inc. submitted their corrective action report. The facility's corrective actions included increased training to improve maintenance, replacement of all piping between the batch tank and the sample point, installation of a new 50-micron sediment filter on the effluent of the batch tank, pressure washing the batch tank to remove sediments, and implementation of a new quarterly maintenance schedule for cleaning the batch tank.

#### January 1 – June 30, 2023

On April 12, 2023, CP-Carrillo, Inc. (McGaw) had a daily maximum exceedance for copper and O&G-min for which an NOV was issued for copper and O&G on June 1, 2023. On May 24, 2023, OC San conducted a compliance inspection to investigate the root cause of these violations, collect a resample, and review facility operations. During the inspection, CP-Carrillo, Inc. (McGaw) attributed the copper violation to sediment remaining in the lower section of the vertical cone bottom style batch tank following routine cleaning that had carried over into the tank discharge line. CP-Carrillo, Inc. (McGaw) was in the process of investigating the source of the O&G-min violation at the time of the inspection. On June 2, 2023, CP-Carrillo, Inc. (McGaw) submitted their corrective action report which attributed the O&G-min violation to a combination of lack of maintenance on the parts washer sump tank and an increase of oily parts processing. CP-Carrillo, Inc. (McGaw) reported that the facility has installed a new batch tank and implemented a quarterly cleaning schedule of all tank components and piping to reduce excess sediment build-up and address the copper violation. Corrective actions to address the O&G-min violation included an initial detailed cleaning of the parts washer sump tank and routine cleaning monthly thereafter.

CP-Carrillo, Inc. (McGaw) 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 CP-Carrillo, Inc. (McGaw)'s discharge and compliance status on a quarterly basis.

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

Data Electronic Services (DES) is a job shop that processes customer-supplied boards. The circuit board manufacturing process is typically accomplished through copper panel plating with a small number that include copper pattern plating techniques as well as tin plating etch resist. Multilayer hole conductivity is completed via potassium permanganate, hole conditioning, micro-etch, palladium catalyst, and electroless copper plating. Other operations conducted on site include automatic and high pressure Hyoki scrubbing, resist stripping, and rack stripping. Final surface finishing includes bright nickel plating, silver plating, tin plating, and electroless nickel immersion gold plating. The effluent discharge at DES is generated by the aqueous fume scrubbing, the various spent process solutions, and the associated rinse wastestreams. DES employs continuous hydroxide precipitation, batch treatment, clarification, and solids processing by filter press prior to discharge to the sewer.

#### July 1 – December 31, 2022

On October 5, 2022, DES had a copper violation, for which an NOV was issued on December 13, 2022.

#### January 1 – June 30, 2023

On March 23, 2023, DES submitted a corrective action for the copper violation that occurred during the last reporting period. DES attributed the source of the violation to continuously open water valves at the

electroless plating lines and a loss of control. As a corrective action, DES has now employed the practice of closing water valves as necessary.

DES had no 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 DES's discharge and compliance on a quarterly basis.

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

Data Solder, Inc. (DS) is a job shop printed circuit board manufacturing facility which includes masking of panels upon arrival at the facility, pre-cleaning in a conveyORIZED process line with a ferric chloride microetch and flux, soldering in a HASL machine, and post cleaned using clean city water. The HASL operation is 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 the post clean step.

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

July 1 – December 31, 2022

DS had no violations during this reporting period.

January 1 – June 30, 2023

In April 2023, DS had a lead monthly discharge limit violation for which an NOV will be issued during the next reporting period.

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

From November 2018 through 2020, Dr. Smoothie had a multiple pH violations which resulted in escalated enforcement and the installation of an inadequate pH adjustment system. In addition, Dr. Smoothie encountered other issues that exacerbated the facility's noncompliance including, sample point inadequacies, maintenance of the pH chart recorder, equipment redundancy, and a maintenance activity logbook.

In March and April 2021, after further pH violations and a compliance meeting, Dr. Smoothie submitted a proposal for a batch pH adjustment system with 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, 2022

Dr. Smoothie had no violations during this reporting period.



January 1 – June 30, 2023

On May 24, 2023, Dr. Smoothie had a pH violation, for which an NOV was issued on June 14, 2023. Dr. Smoothie submitted a root cause analysis and corrective action report was submitted on June 21, 2023, attributing the violation to a failure in the wiring for their pH probe which caused the probe to read an incorrect pH and failure of the automatic chemical dosing and automatic shut-off valve. As an interim solution, Dr. Smoothie manually adjusted the pH at the clarifier. Dr. Smoothie had also contracted out the servicing of their pH probe to an external vendor, calibrating twice per month and establishing a maintenance cleaning schedule for their pH probes twice per week. During the cleaning of their pH probes, Dr. Smoothie cross references the probe reading with a handheld pH probe meter to ensure the probe is working correctly. Dr. Smoothie completed the replacement of their probe wiring on June 7, 2023.

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

**Dunham Metal Plating Inc. (Permit No. 1-601023)**

Dunham Metal Processing (Dunham) is a small metal finishing job shop that specializes in clear, color, and multicolor sulfuric anodizing of aluminum parts for the aerospace, automotive, electronics, medical, and sporting goods industries. Wastewater is generated from the various spent process solutions and associated rinses. Dunham treats rinses and dye solutions in a continuous pretreatment system that consists of pH adjustment, polymer addition, and clarification in a lamella clarifier. Filtrate from the filter press is recycled back to treatment while treated water from the clarifier is discharged to the sewer. Most concentrated spent solutions are either waste-hauled offsite or reused to make up new process solutions. The spent anodizing solutions are used to make up fresh deoxidizer. The dye solutions are mostly replenished but are sometimes used for pH adjustment prior to discharge to the sewer. Sludge from tank bottoms is pumped once every three or four years and waste-hauled offsite.

July 1 – December 31, 2022

Dunham had no violations during this reporting period.

January 1 – June 30, 2023

In March 2023, Dunham had a monthly zinc violation for which an NOV was issued June 1, 2023.

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

**Dunham Metal Processing (Permit 1-021325)**

Dunham Metal Processing (Dunham Metal) is a small metal finishing job shop that specializes in clear, color, and multicolor sulfuric anodizing on aluminum parts for the aerospace, automotive, electronics, medical, and sporting goods industries. Other services include laser marking, silk screen printing, and spray painting. The effluent discharge is generated by various spent process solutions and associated rinses. Pretreatment includes pH adjustment, metal precipitation, and solids removal through a clarifier prior to discharge.

July 1 – December 31, 2022

Dunham Metal had no violations during this reporting period.

January 1 – June 30, 2023

On January 13, 2023, Dunham Metal had a violation for nickel for which an NOV was issued February 8, 2023. Results from voluntary sampling performed on February 23, 24, 28, and March 1 demonstrated compliance with discharge limits. On March 9, 2023, OC San conducted a compliance inspection during which Dunham Metal attributed the source of the nickel violation to a decanting process associated with a 100-gallon tank containing blue dye which followed a nickel acetate seal. Additionally, the facility identified that the operator failed to address excess solid accumulation in the clarifier leading to wastewater with

elevated levels of nickel containing solids to be discharged to the sewer. On March 17, 2023, Dunham Metal submitted a corrective action report to OC San which stated that the facility purchased parts to add a spray rinse to each of the nickel acetate tanks to minimize drag-out. Dunham Metal also instituted other corrective actions including the installation of spray rinses on rinse tanks, retraining of operators to monitor solids accumulation in the clarifier, and investigating design options for a conical-bottom clarifier or additional tank to enhance solids settling. OC San issued an NOV for the January monthly violation for nickel and required Dunham to submit an updated operation and maintenance manual. Dunham Metal 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 follow-up on documentation requirements and continue to monitor Dunham Metals' discharge and compliance status on a quarterly basis.

#### **Edwards Lifesciences, LLC (Permit No. S-601312)**

Edwards Lifesciences, LLC (Edwards) is an SPDP that has been active since 2022. Groundwater seepage is collected from foundation drains below a parking garage. The groundwater collection system consists of a sump beneath the parking structure. Over time, groundwater seepage accumulates in the sump and is conveyed through a pH adjustment system prior to discharge to the sewer. The pH adjustment system consists of citric acid injection and a flow totalizer.

During the permit inspection in May 2022, OC San observed that the existing sump had a direct piping connection to OC San sewerage facilities which bypassed the pH adjustment system. In June 2022, OC San met with Edwards prior to issuing the new permit to review the current system configuration and discuss options for mitigating the bypass of treatment. During the same month, OC San received Edwards's proposal in response to the bypass of treatment of groundwater conveyed to the sump.

#### **July 1 – December 31, 2022**

On November 2, 2022, OC San issued a compliance requirement letter accepting Edwards's proposal to (1) install new controls on the sump pump, including integration of the existing pH adjustment system controller and pH high and low alarms, (2) install a flow totalizer on the sump discharge line to totalize any potential flow of wastewater that bypasses the pH adjustment system, and (3) implement the proposal by the next reporting period.

#### **January 1 – June 30, 2023**

Edwards had no violations during this reporting period. OC San verified the implementation of the proposal and installation of equipment in the previous reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

OC San will continue to monitor Edwards' discharge and compliance 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.

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

#### July 1 – December 31, 2022

In July 2022, RMF exceeded the both the cadmium and copper monthly average discharge limits. On August 3, 2022, RMF had a nickel violation, for which an NOV was issued on September 13, 2022. This violation resulted in a monthly average discharge limit exceedance for the month of August 2022, for which an NOV was issued on November 1, 2022.

On September 22, 2022, RMF exceeded the loading daily average limit for copper, for which an NOV was issued on October 18, 2022. On October 4, 2022, OC San issued an NOV for the July 2022 cadmium and copper monthly average discharge limit exceedances.

On November 2, 2022, OC San conducted a 30-day resample and compliance Inspection. RMF noted that a pump on the filter press had been damaged, resulting in metals not being captured by the filter press. RMF also noted that while modifying the pretreatment system proposal, they had noted several sections could benefit from an increase in sizing and would be including this in the pretreatment system proposal.

OC San will review RMF's pretreatment system proposal upon receipt, and will continue to monitor RMF's discharge and compliance status on a quarterly basis.

#### January 1 – June 30, 2023

In January 2023, RMF exceeded the monthly average discharge limit for cadmium, for which an NOV was issued on April 6, 2023. On April 20 and April 26, 2023, RMF had cadmium violations from its own sampling, which RMF failed to notify OC San. These violations as well as a monthly average discharge limit exceedance for April 2023 will result in NOV's being issued during the next reporting period.

On May 25, 2023, RMF had a cadmium violation, for which a NOV was issued on June 22, 2023. This violation will result in a monthly average discharge limit exceedance for May 2023 which an NOV will be issued during the next reporting period. OC San requested updates to the pretreatment system proposal; however, no formal proposal was received.

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

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

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

#### July 1 – December 31, 2022

Electrolurgy had no violations during this reporting period.

#### January 1 – June 30, 2023

During an inspection on March 22, 2023, OC San observed that Electrolurgy routinely conveyed accumulated stormwater in the outdoor waste storage area to the pretreatment system batch tank for discharge to the sewer system. On April 27, 2023, OC San issued an NOV for prohibited discharge of surface runoff and groundwater to the sewer, requiring Electrolurgy to submit a proposal to prevent the discharge of stormwater to the sewer. On May 9, 2023, Electrolurgy informed OC San that the stormwater accumulated in the outdoor waste storage area was due to a damaged roof and the facility had ceased this practice of discharging stormwater to the sewer. Corrective actions performed by Electrolurgy to address

this NOV included increased training of facility personnel and roof repairs to the outdoor waste storage area to prevent stormwater accumulation in this area.

Electrolurgy 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 Electrolurgy's discharge and compliance status on a quarterly basis.

### **Envista Holdings Corporation (No Permit Required)**

The Envista Holdings Corporation (Envista) facility at 1717 W. Collins Avenue in Orange manufactures dental pastes, which consist of various mineral-based slurries mixed with additives (monomers).

#### **July 1 – December 31, 2022**

On July 19, 2022, an inspection was held between OC San and Envista to discuss Envista's industrial wastewater discharge and determined that a permit was not required for the facility. However, an NOV was issued on December 13, 2022, regarding the prohibited discharge of single-pass cooling water. Envista was required to submit a proposal to correct the violation by January 13, 2023, and after acceptance by OC San, complete installation by February 28, 2023.

#### **January 1 – June 30, 2023**

OC San received a proposal from Envista on January 6, 2023, to use cease the discharge of single-pass cooling water to the sewer and use an existing chiller in a closed-loop configuration. OC San accepted this proposal on February 2, 2023, and Envista subsequently provided information, drawings, and photographs documenting the change to the facility in a letter dated March 2, 2023.

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

### **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, which is in violation of OC San's prohibition on dilution. OC San also observed two different discharge points for GKN industrial waste and a wash sink that were not routed to the compliance sample point, for which OC San issued an NOV in March 2022. OC San also requested GKN to submit a proposal for a representative sample point. In April 2022, GKN indicated that they ceased the continuous discharge of clean water into the trench drains, waste hauled all generated wastewater from industrial sinks in Building 2, and were still working to identify a potential location for a representative sample point. GKN encountered several delays in obtaining the proposal for the representative sample point and required multiple extensions.

#### **July 1 – December 31, 2022**

On August 10, 2022, GKN submitted their proposal for their representative sample point. A meeting between OC San and GKN was held on August 17, 2022, to discuss the proposal. OC San requested that GKN submit a revised proposal to clarify the position of different wastewater sources and their relation to the new sample point. On September 1, 2022, GKN submitted a revised proposal that showed all wastewater sources and their plumbing configurations to the new sample point. OC San accepted GKN's proposal on September 9, 2022, and required GKN to implement the proposed sample point by October 31, 2022. GKN encountered additional delays in obtaining funds and had some scheduling conflicts with

their contractor to start the installation. GKN completed the installation of the sample point on December 12, 2022.

#### January 1 – June 30, 2023

On March 13, 2023, OC San conducted a compliance inspection to review the installed sample point. While the sample point was installed as proposed, OC San observed excessive solids accumulation in the clarifier and in the sample point. Although GKN indicated that the clarifier and sample point is pumped out three times a week to reduce the solids accumulation, evidence of continued solids accumulation indicates that this practice is insufficient. On May 2, 2023, OC San issued an NOV for GKN's violation of the Ordinance which prohibits the discharge of materials which will readily settle or cause an obstruction to flow. The NOV also required GKN to provide a proposal for a pretreatment system to mitigate this issue by May 31, 2023. On May 17, 2023, GKN requested an extension to July 31, 2023, to submit their proposal for a pretreatment system as they finalized the details with their consultant. During a routine quarterly inspection, OC San did not observe any improvement in the quality of GKN's discharge, as evidenced by the continued presence of excessive solids in the sample point and clarifiers. GKN's cleaning logs also indicated that cleaning of the sample point and clarifiers was not conducted for three days in the past week and is inadequate at addressing solids accumulation at the sample point. On May 31, 2023, OC San issued a compliance requirement letter to respond to GKN's extension request and extended the proposal submittal deadline to June 30, 2023. Additionally, the letter also required GKN to provide reasons for their failure to implement an effective interim solution to address the excessive solids accumulation and to provide a revised interim solution by June 9, 2023. OC San also required GKN to attend a compliance meeting on July 13, 2023. On June 9, 2023, GKN submitted their responses attributing their failure in implementing an effective interim solution due to a miscommunication regarding equipment availability with their cleaning vendor. As a corrective action, GKN has clarified expectations with their vendor to ensure that the clarifier and the sample point will be cleaned five to six times a week. Additionally, GKN has installed bag filters to each clarifier to reduce the solids entering the sample point. On June 30, 2023, GKN submitted their proposal for a pretreatment system. OC San is currently evaluating this proposal and will provide a response during the next period.

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

#### **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 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.

On August 25, 2021, OC San conducted an Industrial Waste Survey, in which it was determined Gold Coast Baking warranted a Class 1 Wastewater Discharge Permit. Following multiple correspondence requesting the submittal of a permit application, it was not received.

#### July 1 – December 31, 2022

On July 22, 2022, OC San received a request for an extension for both the effluent meter and pretreatment system proposals as Gold Coast was working with multiple consultants and attempting to determine the best appropriate option, to which OC San accepted the extension request for a new date of August 15, 2022.

On August 5, 2022, OC San received an effluent meter proposal from Gold Coast Baking; however, a pretreatment system proposal continued to be developed. Between August and September 2022, OC San and Gold Coast Baking exchanged emails regarding information about the specific effluent meter proposed; however, it was determined that the specified effluent meter was not acceptable as it would only display the flowrate (i.e., volume per unit time), and lacked a non-resettable totalizer. During this time a pretreatment system proposal was not submitted.

On November 16, 2022, Gold Coast Baking had a pH violation, for which an NOV was issued on December 1, 2022. On December 19, 2022, OC San conducted a compliance inspection at Gold Coast Baking and resampled for pH. OC San noted that although the wastewater was compliant at the time of the resample, a pretreatment system proposal was past due, and additional pH violations would likely continue to occur. Gold Coast Baking stated it would re-evaluate its proposals (both for the installation of the pretreatment system and effluent meter) with its consultants and submit revised proposals.

#### January 1 – June 30, 2023

On March 1, 2023, Gold Coast Baking had a pH violation, for which an NOV was issued on March 16, 2023. OC San conducted a 30-day resample on April 11, 2023, during which Gold Coast Baking had an additional pH violation, for which a NOV was issued on June 1, 2023. On May 15, 2023, OC San issued an NOV for failure to comply with requirements, requiring Gold Coast to attend a compliance meeting since OC San had not received updated proposals for either the installation of an effluent meter, nor an automatic pH adjustment system. OC San also directed Gold Coast Baking to discuss the recent pH non-compliances. On June 5 and 6, 2023, Gold Coast Baking had additional pH violations, for which an NOV was issued on June 22, 2023. On June 7, 2023, a compliance meeting was held between OC San and Gold Coast Baking. Gold Coast Baking noted that the consultant who had assisted in providing the initial proposals no longer offered wastewater services, further delaying the proposal process. Gold Coast Baking noted increases in production due to new contracts and client requirements, prioritizing business over regulatory requirements. OC San reminded Gold Coast Baking of their requirement to maintain compliance with the permit conditions and discharge limits at all times. OC San also provided suggestions based on similar industries to help develop the pH proposal, and also aid in reducing BOD and TSS concentrations upstream of the clarifier. OC San will conduct a 30-day resample and inspection, and continue enforcement during the next reporting period.

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

#### **Goodwin Company (Permit No 1-031043)**

Goodwin Company (Goodwin) manufactures household cleaning and surface treatment products which are formulated from raw chemical feedstocks and soft water. Floor and equipment wash-downs represent most of the industrial wastewater generated, along with a small amount of soft water system reject. Floor run-off from production room and outdoor tank farm area is collected and then pumped over to an equalization tank and runs through a series of bag filters before discharging to the sewer.

On May 10, 2022, Goodwin had an O&G-min. violation for which an NOV was issued on June 16, 2022. OC San requested a corrective action letter to be submitted by June 30, 2022.

#### July 1 – December 31, 2022

On July 6, 2022, Goodwin submitted their root cause analysis and corrective action report. Goodwin attributed the violation to debris build-up in the trenches where rinse water drains from the fill lines. As a corrective action, Goodwin implemented monthly cleaning of the trenches. On July 18, 2022, OC San conducted a compliance inspection to review the cause of the violation. During the inspection, Goodwin informed OC San that they conducted further investigation and attributed the violation to spills from one of their fill machines. The fill machine does not have any secondary containment to capture any spills or excess chemicals. The excess chemicals discharge to a floor drain, and is then pumped to the treatment system. OC San also observed that wastewater from a hand sink by the tank washdown area flows as runoff over a concrete pad into a floor drain. OC San required Goodwin to hard plumb the hand sink and to

install secondary containment under the fill machine by August 31, 2022. On September 2, 2022, Goodwin had completed the replumbing and installation of the secondary containment. On November 22, 2022, Goodwin had another O&G-min. violation, for which an NOV was issued on December 29, 2022.

#### January 1 – June 30, 2023

On January 11, 2023, OC San conducted a compliance inspection. During the inspection, OC San observed several potential sources of the violations, which included excessive foaming of Goodwin's day tanks for their fill lines and floor wastes that could contribute to the oil and grease that enters the treatment system. On February 27, 2023, Goodwin submitted a root cause analysis and a corrective action report, attributing the violation to overflows from misalignment in their filling machines that causes some product to enter their trench drain and into the wastewater system. Goodwin identified two potential car care products that could have caused the violation as well. As a corrective action, Goodwin plans to purchase and install catch basins for each of their filling lines to catch any overflows and will recycle the captured product. Goodwin estimates to have the catch basins installed on all filling lines by December 2023. In the interim, Goodwin installed temporary catch basins to prevent overflows of their product during the filling process. As of May 15, 2023, Goodwin had installed catch basins for five out of their seven fill lines.

Goodwin had no 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 Goodwin'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 wastehailed 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 a chromium reduction treatment system.

#### July 1 – December 31, 2022

Hightower had no violations during this reporting period.

#### January 1 – June 30, 2023

On May 17, 2023, Hightower had a daily limit cyanide violation and monthly limit exceedance for which NOVs will be issued in the next reporting period.

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

#### **House Foods America Corporation (East) (Permit No. 1-600906)**

House Foods America Corporation (East) (House Foods) manufactures tofu food products from raw soybeans. The soybeans are transported to the facility on large tanker trucks and stored in silos. The soybeans are then transferred into large kettles or vats, where the soybeans are mixed with water and some lime for cleaning and soaking. The mixture is then pressure cooked and ground into slurry to extract the soy milk. Calcium sulfate is added as a coagulant to form tofu "bricks" in conveyerized formation machines where coloration and flavoring are also added. The bricks come off the lines, are inspected, and then packaged for shipment to customers. Equipment and floor wash-down water and the soybean soak and cooking water are the main sources of wastewater discharged. Wastewater from five boiler units and

discharge from a water softening system for the boiler feed water also contribute to the company's effluent discharge. Pretreatment is limited to pH adjustment utilizing sodium hydroxide in the first stage of an underground clarifier.

House Foods America Corporation (East) (House Foods) is the second discharge point that shares the same tofu manufacturing operations as House Foods America Corporation (West) (Permit No. 1-031072). This permit was issued to accommodate additional production lines that discharges to a separate clarifier.

In January 2022, a 24-hour sampling event showed multiple times when pH was below the lower limit of 6, for which an NOV was issued in February 2022. House Foods appealed the NOV as House Foods' pH chart recorder did not show any instances of non-compliant discharges. In April 2022, OC San rescinded the NOV after evaluating onsite data and facility information pertaining to the sample results. However, House Foods continued to investigate potential modifications to their current pH adjustment system.

#### July 1 – December 31, 2022

On July 18, 2022, House Foods submitted a draft design for the modification for the pH adjustment system. House Foods proposed to install a recirculation tank where wastewater is pumped back to all three stages of the clarifier and uses automatic inline pH adjustment. The proposal includes mixing by pump recirculation and included installation of manual shut-off valves. On August 4, 2022, a meeting was held between OC San, House Foods, and House Foods's consultant to discuss the draft design. OC San noted that the recirculation will degrade the settling capacity in the clarifier. On October 18, 2022, House Foods submitted a revised proposal that included additional solids removal via a self-indexing filter system from their tofu presses prior to pH adjustment.

#### January 1 – June 30, 2023

House Foods had no violations during this reporting period. House Foods previously submitted a proposal and OC San continues to correspond with House Foods, review the proposal, and will respond during the next reporting period.

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

#### **House Foods America Corporation (West) (Permit No. 1-031072)**

House Foods America Corporation (West) (House Foods West) manufactures tofu food products from raw soybeans. The soybeans are transported to the facility on large tanker trucks and stored in silos. The soybeans are then transferred into large kettles or vats, where the soybeans are mixed with water and some lime for cleaning and soaking. The mixture is then pressure cooked and ground into slurry to extract the soy milk. Calcium sulfate is added as a coagulant to form tofu "bricks" in conveyORIZED formation machines where coloration and flavoring are also added. The bricks come off the lines, are inspected, and then packaged for shipment to customers. Equipment and floor wash-down water and the soybean soak and cooking water are the main sources of wastewater discharged. Wastewater from five boiler units and discharge from a water softening system for the boiler feed water also contribute to the company's effluent discharge. Pretreatment is limited to pH adjustment utilizing sodium hydroxide in the first stage of an underground clarifier.

In January 2022, a 24-hour sampling event showed multiple times when pH was below the lower limit of 6, for which an NOV was issued in February 2022. House Foods West appealed the NOV as House Foods West's pH chart recorder did not show any instances of non-compliant discharges. In April 2022, OC San rescinded the NOV after evaluating onsite data and facility information pertaining to the sample results. However, House Foods West continued to investigate potential modifications to their current pH adjustment system.

#### July 1 – December 31, 2022

House Foods West submitted a proposal for the modification for the pH adjustment system on July 18, 2022. House Foods West proposed to install a recirculation tank where wastewater is pumped back to all three stages of the clarifier and is uses automatic inline pH adjustment. The proposal includes mixing by



pump recirculation and included installation of manual shut off valves. A meeting was held on August 4, 2022, between OC San, House Foods West, and their consultant to discuss the draft design. OC San noted that the recirculation will degrade the settling capacity in the clarifier. On October 18, 2022, House Foods West submitted a revised proposal that included additional solids removal via a self-indexing filter system from their tofu presses prior to pH adjustment.

January 1 – June 30, 2023

House Foods West had no violations during this reporting period. House Foods previously submitted a proposal and OC San continues to correspond with House Foods, review the proposal, and will respond during the next reporting period.

OC San will continue to monitor House Foods' 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 requirement 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, 2022

On July 18, 2022, Howmet informed OC San that the canopy drawings are currently with the City of Fullerton's Fire Department. OC San will continue to follow up with Howmet and estimates a completion date in the next reporting period.

January 1 – June 30, 2023

As of February 2, 2023, Howmet has received approval from the City of Fullerton. However, Howmet encountered several delays with their subcontractor in starting the project. On February 27, 2023, Howmet notified OC San that they managed to resolve the delays and are ready to complete the project. Construction for the canopy started on April 24, 2023 and Howmet estimates the completion of the construction by the next reporting period.

OC San will follow up on the status of the canopy project during the next reporting period and continue to monitor Howmet's discharge and compliance status on a quarterly basis.

**International Paper Company (Anaheim) (Permit No. 1-521820)**

International Paper Company (Anaheim) (International Paper-Anaheim) manufactures corrugated boxes for consumer goods. The facility discharges wastewater generated from flexographic printers and work area washdowns to a batch treatment system for pH adjustment, polymer application, and phase separation via a filter press prior to final discharge to sample point and sewer. Wastewater generated from the corrugator and boiler blowdown discharges directly to the sample point.

July 1, 2022 – December 31, 2022

On September 27, 2022, OC San conducted an inspection at International Paper-Anaheim. During the inspection, OC San noted the facility was replacing the corrugator without prior written notification to OC San, which was in violation of International Paper-Anaheim's permit conditions and OC San's Ordinance. Separately, International Paper-Anaheim had failed to submit updated drawings and flow diagrams as required by Permit No. 1-521820, issued July 27, 2022. During the months of September through December, OC San requested a summary of the modifications made to facility operations and wastewater management and reiterated the request for updated facility figures as required by the permit.

#### January 1, 2023 – June 30, 2023

On January 19, 2023, OC San issued an NOV to International Paper-Anaheim for failure to comply with permit conditions and OC's Ordinance from the previous reporting period. OC San also reiterated the requirements to submit updated facility figures and a summary of facility modifications. On March 2, 2023, International Paper-Anaheim submitted a summary of modifications made to facility operations and wastewater management, and on May 24, 2023, International Paper-Anaheim submitted updated facility figures.

International Paper-Anaheim 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 International Paper-Anaheim's discharge and compliance status on a quarterly basis.

#### **International Paper Company (Buena Park Bag) (Permit No. 1-531419)**

International Paper Company (Buena Park Bag) (International Paper-Buena Park) is a manufacturer of paper bags for grocery stores, fast food restaurants, and for resale through various redistribution outlets. Various grades of paper roll stock are used to manufacture the paper bags according to customer requirements. The manufacturing process consists of rolling, folding, and gluing the paper. Logos and graphics are printed using water-based inks. A glue derived from corn starch and dextrin is used, and pumped through the facility via a closed loop circuit to apply adhesive to the paper bags.

Wastewater is generated from the cleaning and washing of ink trays/buckets and floor cleaning. Wastewater is transferred via a sump and sump pump to a 1,000-gallon batch tank where solids and metals are removed through a filter press following sludge thickening. Filter cake is disposed of in the local trash as non-hazardous waste and is tested once every three years.

#### July 1 – December 31, 2022

International Paper-Buna Park had no violations during this reporting period.

#### January 1 – June 30, 2023

On May 3, 2023, International Paper-Buena Park had a TSS and zinc violation for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next monitoring period and continue to monitor International Paper-Buena Park's discharge and compliance status on a quarterly basis.

#### **IsoTis OrthoBiologics, Inc. (Permit No. 1-601134)**

IsoTis OrthoBiologics, Inc. (IsoTis) is a manufacturer of orthobiologics products out of human or bovine bone powder, which are used in spinal surgeries. Wastewater generating processes include washing of supplies and tubing, autoclaves employed for sterilization, demineralization, diafiltration with citric acid, laboratory testing, and quality equipment validation. Wastewater is gravity drained through a sample box and discharged to the sewer.

#### July 1 – December 31, 2022

IsoTis had no violations during this reporting period.

#### January 1 – June 30, 2023

IsoTis had a pH violation on January 31, 2023, for which an NOV was issued on March 16, 2023. On March 31, 2023, IsoTis submitted their corrective action report attributing the pH violation to increased production in the diafiltration process in combination with insufficient pH monitoring and caustic dosing. Corrective actions identified by IsoTis in the report included increased pH monitoring of the discharge and manual adjustment of the caustic dosing pump associated with the diafiltration process. To ensure long-term compliance, IsoTis implemented real-time continuous pH monitoring of the diafiltration process and the compliance sample point. On April 5, 2023, OC San conducted a compliance inspection to verify corrective actions were implemented and collect a resample. During the inspection, OC San verified corrective actions had been implemented and discussed the schedule for installation of real-time continuous pH monitoring. Resample results showed compliant levels of pH. IsoTis projected that real-time continuous pH monitoring will be implemented during the next reporting period.

IsoTis 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 IsoTis's discharge and compliance status on a quarterly basis.

#### **J & R Metal Finishing Co. (Permit No. 1-521823)**

J & R Metal Finishing Co. (J & R) performs vibratory milling and deburring of metal parts. J & R discharges rinsewater to a continuous pretreatment system for pH adjustment, polymer application, and sedimentation. The facility utilizes a filter press for phase separation and returns the filtrate to the start of the continuous treatment train for supplemental treatment. The facility collects solids for offsite disposal.

#### July 1 – December 31, 2022

J & R had no violations during this reporting period.

#### January 1 – June 30, 2023

On June 19, 2023, J & R notified OC San that the facility planned to relocate operations by July 1, 2023. Based on the forthcoming plan to relocate, the facility did not submit a permit renewal application for Permit No. 1-521823 which expired June 30, 2023. Therefore, OC San issued an order to terminate discharge effective July 1, 2023.

J & R ceased wastewater discharge to OC San's sewer in June 2023, and closed their business in July 2023. OC San made routine facility inspections to verify J & R did not discharge industrial wastewater to the sewer without a valid permit. On July 5, 2023, OC San received J & R's request to close account, for which, the permit was voided and account was closed.

#### **JD Processing, Inc. (East) (Permit No. 1-511407)**

JD Processing, Inc. (East) (JD Processing) is a metal plating facility for the military, medical, and aerospace industries. The manufacturing processes includes alkaline cleaning, anodizing, passivation, and color dyeing to the customers specifications.

Wastewater is generated from various rinses from the plating process. Wastewater transfers to a pretreatment system via two sumps (one from the anodizing line, and another from the passivation line). Wastewater undergoes pH adjustment prior to discharge to a dedicated sampling box. JD Processing also utilizes a batch treatment system for concentrated rinses and process solutions. Wastewater from the batch system is treated through a separate tank, which is pumped through a filter press. The filter press filtrate is returned to the pretreatment system for additional treatment.

#### July 1 – December 31, 2022

On July 7, 2022, OC San issued an NOV for an April 2022 zinc monthly average discharge limit exceedance. JD Processing attributed the elevated zinc levels to increased production during April 2022,

and JD Processing has since maintained compliance with both the daily and monthly average discharge limits for zinc.

#### January 1 – June 30, 2023

JD Processing had no 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 JD Processing's discharge and compliance status on a quarterly basis.

#### **Jellco Container, Inc. (Permit No. 1-021402)**

Jellco Containers, Inc. (Jellco) manufactures corrugated containers. Raw cardboard stock is brought in, then laid flat so the sheets can pass through a flexographic printer system for application of customer signage and art designs using various colors of food grade ink, primarily black, blue, and red. The cardboard is then off loaded from the printers to slit and folding machines for final container assembly before being stacked on pallets for shipment to customers. Wastewater generated at Jellco consists of printer ink container washouts (when color changes occur) and equipment and floor wash down water. The wastewater is collected in pits near each printer, then pumped to Jellco's packaged pretreatment system. The pretreatment system consists of a pH adjustment/collection tank, where polymer flocculant is added by chemical feed pump along with caustic injection and mechanical mixing, then pumped through a vacuum assisted rotary drum filter, where the solids accumulate and are scraped off from the outside and into a bin for wastehauling off-site. The filtered wastewater is drained from the inside of the drum to a cleanout and sewer connection.

#### July 1 – December 31, 2022

On July 6, 2022, Jellco had instantaneous and daily average molybdenum violations for which an NOV was issued on July 21, 2022. On August 9, 2022, OC San conducted a compliance inspection and on October 3, 2022, OC San issued a compliance requirement letter that directed Jellco to submit a corrective action report. On October 14, 2022, Jellco submitted a corrective action report which attributed the molybdenum violations to four ink formulas that utilize molybdenum-bearing pigments. To ensure long-term compliance, Jellco proposed to install two ion exchange vessels specifically designed to remove molybdenum. On October 25, 2022, OC San requested additional information concerning the proposal. That same day, Jellco had instantaneous and daily average molybdenum violations, for which an NOV was issued on November 8, 2022. On November 1, 2022, Jellco responded to OC San's request for additional information, and on November 15, 2022, OC San accepted Jellco's proposal to install two ion exchange vessels. On December 19, 2022, OC San conducted a compliance inspection to review the molybdenum violations that occurred October 25, 2022, and to review progress regarding the installation of the accepted proposal. At the time of inspection, Jellco reported the facility expects installation by January 2023. Separately, Jellco reported the facility had updated employee training and updated internal software to better monitor molybdenum-bearing production orders.

#### January 1, 2023 – June 30, 2023

On February 8, 2023, Jellco had instantaneous and daily average molybdenum violations for which an NOV was issued on March 16, 2023. On March 30, 2023, OC San conducted a compliance inspection to investigate the cause for the recent molybdenum violations. On April 25, 2023, Jellco submitted a corrective action report, indicating that while the facility had recently installed the ion exchange vessels, the flow rate exceeded the design capacity of the ion exchange vessels. Furthermore, the facility identified a valve leak that discharged wastewater to the batch pretreatment system after treatment was complete which may have impacted treatment adequacy and compliance. As corrective actions, Jellco repaired the valve leak, installed a 600-gallon tank equalization tank and pump to control filtration rates, installed a backwash valve and connection to improve ion exchange operation and maintenance, purchased a digital molybdenum photometer for routine effluent analysis, and updated the facility's batch treatment standard operating procedures.

Jellco had no further violations during the reporting period. OC San will continue to monitor Jellco'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.

#### **July 1 – December 31, 2022**

On December 7, 2022, Koia had a pH violation, for which an NOV was issued on December 29, 2022.

#### **January 1 – June 30, 2023**

On January 17, 2023, OC San conducted a compliance inspection to investigate the pH violations that occurred in the previous reporting period. At the time of inspection, Koia was unable to readily identify the cause for the pH violations; however, OC San staff determined the current pretreatment system does not provide sufficient hydraulic retention for adequate pH adjustment. Specifically, Koia continuously feeds pH adjustment chemistry to the clarifier. Due to the nature of its design, the clarifier does not allow or promote sufficient mixing of the contents to achieve adequate pH adjustment. Therefore, the continuous feed of pH adjustment chemistry to the clarifier may result in stratification, which impacts the effectiveness of pH adjustment and long-term compliance.

On February 6, 2023, OC San issued an NOV to Koia for failure to comply with permit conditions. During the compliance inspection conducted on January 17, 2023, OC San noted the manhole to the final clarifier stage was open. Koia had connected a sump pump to the facility's second available effluent line via flexible hosing with the intent to install a second hard-plumbed pump to optimize effluent discharge. However, Koia had failed to provide written notification prior to the observed process changes. Moreover, the open manhole was susceptible to storm water and surface runoff. Based on the above, Koia was directed to close the manhole immediately and submit a proposal for any planned changes to OC San for review.

On February 7, 2023, OC San issued a compliance requirement letter that directed Koia to submit a corrective action report to ensure long-term compliance with permitted limits for wastewater discharge. Between March 14 and June 28, 2023, Koia submitted several corrective action reports that proposed to increase the pretreatment system's hydraulic capacity; however, each corrective action report was rejected by OC San as they did not ensure sufficient hydraulic retention for adequate pH adjustment.

On April 4, 2023, Koia had a pH violation, for which an NOV was issued on June 1, 2023. On June 22, 2023, OC San conducted a compliance inspection to investigate the pH violation. As part of the corrective action report submitted June 28, 2023, Koia attributed the pH violation on April 4, 2023, to empty pH adjustment chemical tanks. In response, the facility retrained its personnel and instituted weekly monitoring of its pretreatment chemical inventory.

OC San has drafted a compliance requirement letter that directs Koia to attend a compliance meeting that will be issued during the next reporting period.

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

#### **Kraft Heinz Company (Permit No. 1-071056)**

Kraft Heinz company (Kraft Heinz) manufactures soups, sauces, and dressings for food servicing restaurants. Bulk materials (a variety of meat and chicken, vinegar, fructose, soybean oil, salad oil, fresh and canned vegetables, soy sauce, milk, butter, cream, cheese, sea food and spices) are shipped onsite and stored in silos or cold storage then transferred as needed to mixers and conveyors in the production areas. Ingredients are weighed and mixed according to each production run and recipe. After production, the finished goods are packaged in jars or plastic bags and then are stored or shipped offsite to end users. Wastewater is generated by the clean in place processing and sterilization of the mixing equipment and

production areas. Wastewater is pH adjusted with caustic in a holding tank after the 2-stage clarifier prior to discharge to the sewer system.

#### July 1 – December 31, 2022

Kraft Heinz had a pH violation on July 6, 2022, for which an NOV was issued on July 14, 2022. A compliance inspection was conducted on July 27, 2022, to review the cause of the violation and collect a resample. OC San observed that the caustic dosing pump was not functional and the caustic holding tank was empty. The resample showed noncompliance with pH for which an NOV was issued on August 4, 2022. On August 29, 2022, a permit renewal inspection was conducted by OC San to further investigate the recent pH violations and to review the facility manufacturing operations for the permit renewal. OC San observed active earthwork operations in the wastewater pretreatment system area around the footprint of the existing clarifier and holding tank. During the inspection, Kraft Heinz indicated the intent of the excavation work was to determine the location and structural integrity of the existing below grade piping between the sodium hydroxide tank and clarifier. Kraft Heinz submitted a corrective action letter on September 16, 2022, stating that the pH violations were a result of an interruption of caustic chemical supply and a failed pH analyzer. Corrective actions proposed by Kraft Heinz included installation of new automation controls including a new PLC and replacement of their below grade clarifier due to poor structural integrity. On September 22, 2022, OC San issued a compliance requirement letter that directed Kraft Heinz to institute these corrective actions. Kraft Heinz is currently implementing the corrective actions, which are projected to be completed in early 2023.

#### January 1 – June 30, 2023

Kraft Heinz had no violations during this reporting period.

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

#### **LGM Subsidiary Holdings LLC (Permit No.1-601313)**

LGM Subsidiary Holdings LLC (LGM) manufactures approximately 40 products in the prescription drug, over the counter (OTC) drug and dietary supplement categories in the form of tablets, capsules, and powders. Products are packaged in labeled high density polyethylene bottles as finished product or plastic lined cardboard bulk boxes for subsequent packaging by customer. Laboratory testing is performed to identify raw materials and verify potency and purity of products manufactured. Manufacturing processes include product mixing, encapsulation, compression, and packaging. Processes which generate wastewater are drum rinsing, blender/mixer washing, potable mill washing, air scrubbing, washing of manufacturing suite walls and floors, and laboratory materials testing. LGM does not have a pretreatment system and relies solely on best management practices in handling solvents used at the facility.

#### July 1 – December 31, 2022

LGM had no violations during this reporting period.

#### January 1 – June 30, 2023

During the pre-permit inspection on March 13, 2023, OC San observed process wastewater streams within LGM's facility that bypass the wastewater discharge compliance sample point. On May 25, 2023, OC San issued a compliance requirement letter to LGM to submit a proposal for a representative sample point by July 14, 2023. OC San will evaluate LGM's proposal and continue enforcement during the next reporting period.

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

#### **Lightning Diversion Systems (Permit No. 1-600338)**

Lightning Diversion Systems (Lightning) designs and manufactures lightning protection devices that divert lightning strikes from aircraft critical components. The protection system consists of segmented diverter strip which provides maximum multiple-strike protection with negligible effect on RF pattern characteristics.

Lightning also manufactures low voltage / high energy surge suppressors for aircraft and ground-based applications, and thin aluminum and copper conformal protection shields for conductive composite laminates.

Lightning uses a batch treatment system to treat its wastewater. Rinse and spent ammoniacal etchant are collected in a sump and then pumped to a batch tank. The batch treatment procedure includes automatic pH adjustment, metal precipitation, coagulation, and flocculation. Filtrate is returned to the batch tank as required and then discharged from the filter to the sample point and sewer.

#### July 1 – December 31, 2022

In September 2022, Lightning had a monthly average copper violation for which an NOV will be issued in the next reporting period.

#### January 1 – June 30, 2023

The NOV for the copper monthly violation limit was issued on March 10, 2023. During the compliance inspection on April 11, 2023, OC San and Lightning review process operations and the treatment system. Lightning indicated that they have provided additional training for their staff and the treatment system is operating within specification. OC San reminded Lightning that compliance must be maintained with all discharge limits including monthly limits and Lightning confirmed that it would verify compliance of treated batches against all discharge limits.

Lightning 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 Lightning's discharge and compliance status on a quarterly basis.

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

Linco Industries, Inc. (Linco) is a small metal parts stripping and cleaning facility. Various parts, including automobile wheels and other accessories, are brought in by customers for stripping of paint and other organic coatings in cold and hot strip baths, followed by immersion or manual spray rinsing. Following stripping and cleaning, Linco uses sulfuric acid and muriatic acid for bright dipping.

The cold strip tanks contain ethanolamine-based chemistry, while the hot strip tank is a Kolene salt bath composed of sodium hydroxide and sodium nitrate chemistry and heated to approximately 550 degrees Fahrenheit.

Wastewater is generated from rinse water used in stripping operations. Linco employs a pretreatment system comprised of conventional hydroxide metals precipitation, clarification, and oil/water separation. Precipitated solids are removed and processed through one of two available filter presses. Filter cake is wastehauled.

#### July 1 – December 31, 2022

On November 3, 2022, OC San issued a compliance requirement letter that directed Linco to submit a report by December 15, 2022, that summarized recent decisions to modify facility operations and established a plan for long-term compliance regarding waste management and cyanide treatment. On December 13, 2022, Linco requested and was granted an extension to submit the report by January 27, 2023.

#### January 1 – June 30, 2023

On January 6, 2023, Linco had instantaneous and daily average cyanide violations for which an NOV was issued on April 14, 2023. On January 12, 2023, Linco had instantaneous and daily average molybdenum violations for which an NOV was issued on April 13, 2023.

Between January 27, 2023, and April 18, 2023, Linco submitted several waste management proposals to separate and adequately treat cyanide. OC San rejected each proposal since waste characterization was

incomplete, technical specifications concerning treatment were omitted, and it was unclear if Linco had adequately sourced and segregated cyanide-bearing wastestreams.

On May 2, 2023, OC San issued an NOV for January's chromium and cyanide monthly average violations. On May 12, 2023, OC San held a meeting with Linco to discuss deficiencies related to the most recent proposal submitted April 18, 2023, and directed Linco to resubmit the proposal by June 30, 2023.

On June 9, 2023, OC San conducted a permit renewal inspection to review facility operations and to reiterate the requirement to submit a waste management proposal by June 30, 2023. During the inspection, OC San noted Linco had 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 pumps 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.

In April 2023, Linco had a monthly average cyanide violation. On May 16, 2023, Linco had a daily average cyanide violation which also resulted in a monthly average cyanide violation. NOVs for the respective violations will be issued and enforcement will continue during the next reporting period.

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

#### **LM Chrome Corporation (Permit No. 1-511361)**

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

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

#### **July 1 – December 31, 2022**

On July 7, OC San issued an NOV for the April 2022 cyanide monthly average discharge limit exceedance. LM Chrome submitted a corrective action report on July 25, 2022, indicating that the cyanide treatment may have been incomplete due to pH and ORP misplacement. As corrective actions, LM Chrome verified that the chemical feed pumps are maintained and properly adjusted, analyzing grab samples prior to dilution, and cleaning of cyanide tanks to reduce contaminants.

#### **January 1 – June 30, 2023**

LM Chrome had no 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 LM Chrome's discharge and compliance status on a quarterly basis.



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

Logi Graphics, Inc. (Logi) produces circuit boards to customer specifications and specializes in prototype and small volume orders. The manufacturing typically begins with cutting the copper clad materials, drilling, photoresist application, inner-layer circuit imaging, resist developing, sulfuric peroxide etching, alkaline resist stripping, brown oxide surface preparation, and lamination. The holes are de-smear with sulfuric acid and made conductive through electroless copper plating. Outer-layer circuit development is conducted by either panel plate or pattern plate processes. Panel plate proceeds with copper plating followed by photoresist application, circuit imaging, resist developing, tin/lead (resist) plating, sulfuric peroxide etching, and tin/lead stripping. Solder mask application and final surface finishing, such as hot air solder leveling and/or electrolytic nickel/gold plating, complete the wet processing.

During a routine inspection in March 2022, Logi reported that the majority of their processes are not in use, and Logi is only manufacturing circuit boards for one customer which only uses copper etching. Most of the copper from the spent etchant is plated out through a separate process and send off site for recovery. OC San also noted that Logi had an elevated level of lead in the effluent discharge in January 2022. Logi stated that they don't have any lead process and were unaware of the source. Logi also indicated that they would begin closure procedures due to slow business and a lack of customers; in response, OC San requested a facility closure plan.

**July 1 – December 31, 2022**

On July 12, 2022, Logi had a nickel exceedance, for which an NOV was issued on July 26, 2022. On October 4, 2022, OC San issued an NOV for the nickel monthly limit violation in July. On August 23, 2022, OC San issued an NOV for the lead monthly exceedance from the previous reporting period. Although Logi previously expressed interest in closing the business, the facility is still operating regularly.

**January 1 – June 30, 2023**

Logi had no violations during this reporting period.

OC San will follow up on closure activities with Logi during the next reporting period and continue to monitor Logi's discharge and compliance status on a quarterly basis.

**MeriCal LLC (Permit No. 1-602025)**

MeriCal, Inc. (MeriCal) manufactures and packages nutritional supplements. Wastewater generated from product condensate, clean-in-place, and equipment rinses discharges to a multistage clarifier and then to sewer.

**July 1 – December 31, 2022**

MeriCal had no violations during this reporting period.

**January 1, 2023 – June 30, 2023**

On June 12, 2023, OC San issued an NOV to MeriCal for discharging wastewater without a valid permit. OC San directed MeriCal to submit a permit application by June 30, 2023, for which, a Class I Wastewater Discharge Permit Application was received on June 29, 2023.

OC San will issue a Class I Wastewater Discharge Permit during the next reporting period and continue to monitor MeriCal's discharge and compliance status on a quarterly basis.

**Mercial, LLC (Permit No. 1-600655)**

Mercial, LLC is a manufacturer of solid dosage nutritional supplements, tablets, hard shell gelatin capsules, protein powders, drink mixes containing vitamins, minerals, and herbal supplements. The company also packages powders in pouches, packets, and stick packs. Raw materials in powder form are mixed in a vessel that is washed after formulation. The generated wastewater is collected in a catch basin and drained

to the treatment system sump. Contents in the collection sump are pumped into a reaction tank where a flocculant is added to a reaction tank and mixed to allow any solids washed down from process equipment to settle. The wastewater is then pumped through the filter press to remove solids and the filtrate then passes through a three stage below ground clarifier before discharging to the sewer.

July 1 – December 31, 2022

Merical, LLC had no violations during this reporting period.

January 1 – June 30, 2023

On March 21, 2023, Merical, LLC had a zinc violation for which an NOV was issued on June 1, 2023. On June 27, 2023, OC San conducted a compliance inspection. During the compliance inspection, Merical, LLC reported that they had been processing and packaging supplements containing zinc. As a corrective measure, Merical, LLC has performed preventative maintenance to remove solids that may have built up in the system. Merical, LLC will submit their corrective action report during the next reporting period.

OC San will review the corrective action report during the next reporting period and continue to monitor Merical, LLC'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 – December 31, 2022

Micrometals had no violations during this reporting period.

January 1, 2023 – June 30, 2023

On June 23, 2023, Micrometals had a daily average lead violation for which an NOV will be issued in the next reporting period.

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

**Newport Corporation (Permit No. 1-601837)**

Newport Corporation (Newport) is a manufacturer of custom specified mirrors and optical lenses for use in high end laboratory applications. The manufacturing process consists of grinding, etching, coating, and polishing of glass mirrors and lenses. Glass blanks are shaped in CNC machines followed by orbital polishing, known as chemical mechanical polishing. Following the polishing process, the lenses are cleaned and undergo a final Quality Assurance/Quality control (QA/QC) inspection. The polishing process step is repeated until QA/QC specifications are met. The final products are coated using a deep-UV dynavac coating vacuum pump to customer specification. Wastewater generated from multiple polishing tables and ultrasonic cleaning, which is conveyed to an outdoor three-stage above grade clarifier prior to discharge to the sewer.

July 1 – December 31, 2022

Newport had no violations during this reporting period.

#### January 1 – June 30, 2023

Newport had a pH violation on March 13, 2023, for which an NOV was issued on March 30, 2023. On April 17, 2023, OC San conducted a compliance inspection to investigate the root cause of the pH violation and collect a compliance resample which showed compliance with pH limits. During the inspection and confirmed in a corrective action report from Newport on May 4, 2023, Newport attributed the pH violation to a maintenance procedure performed to prevent bacterial growth and crystallization from stagnant water and polishing slurry. The procedure was performed during a recent long-term shutdown of facility operations. To prevent fouling, Newport performed a flush with vinegar of their polishing machines prior to restarting operations at their facility. Corrective actions identified by Newport included reduced cleaning of the polishing machines with vinegar during future shutdown events, calibration of the pH sensor and continuous monitoring of pH levels at the clarifier, and pH adjustment as necessary. Newport is also exploring alternative cleaning agents to replace vinegar in this maintenance procedure.

Newport 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 Newport's discharge and compliance status on a quarterly basis.

#### **Pacific Chrome Services (Permit No. Z-601871)**

Pacific Chrome Services (PCS) is a small metal finisher operating under a Zero Discharge (ZD) Certification. PCS polishes client manufactured parts for the automotive and motorcycle industry. PCS also performs plating on bathroom parts such as shower accessories and sink faucets and spouts. All spent process and rinse tanks are transferred to one of two 275-gallon totes. Operations include nickel, chrome, and copper plating along with various acidic and soap cleaners.

#### July 1 – December 31, 2022

During a review of the ZD certification application, it was noted that a change in ownership had occurred in April of 2022, for which OC San was not notified.

On December 7, 2022, OC San issued an NOV for failing to notify OC San of the change in ownership. PCS submitted a new ZD application, and a new ZD Certification was issued to the new owners under ZD Certification No. Z-601871.

#### January 1 – June 30, 2023

PCS had no 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 PCS'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 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 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.

#### July 1 – December 31, 2022

In November 2022, Patriot exceeded the monthly average discharge limit for 4-methylphenol, for which a NOV will be issued during next reporting period.

#### January 1 – June 30, 2023

On February 2, 2023, OC San issued the NOV for the November 2022 4-methylphenol monthly average discharge limit exceedance. Patriot noted the increased 4-methylphenol concentration likely resulted from a particular waste profile. Patriot however noted they would continue to perform additional in-house analytical testing for concentration verification, and instituted protocols to perform additional and voluntary sampling as needed for a particular constituent which may be above the monthly average discharge limit.

Patriot had no 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 Patriot's discharge and compliance status on a quarterly basis.

#### **PCX Aerosystems – Santa Ana (Permit No. 1-601618)**

PCX Aerosystems – Santa Ana (PCX) (formerly permitted as Integral Aerospace, LLC) is a manufacturer of metal and composite aerospace components consisting of fuel tanks, landing gear, tail hooks, jack screws, and other related service parts for commercial and military aircraft. PCX also performs rebuilding and servicing of parts that it manufactures. The parts are disassembled, cleaned, replacement parts installed, assembled, and tested. Raw materials used in the manufacture or processing of parts are aluminum and steel sheet and bar, magnesium, titanium, plastic liners, epoxy resins, fiberglass, adhesives, and cleaning solvents.

Several areas are employed for cleaning and inspection of parts which includes dye penetrant testing, aqueous spray washer for precision cleaning metal parts, and a steam cleaner for non-precision metal parts. These processes are discharged to a common sump, from which the contents are then pumped to a batch pH adjustment system, treated, and discharged.

Additional wastewater is generated during the application of a chromate conversion coating on aluminum parts. Rinsewater generated is collected, filtered through a five-micron cartridge filter, a granular activated carbon vessel, then a series of cationic and anionic ion exchange columns. The treated water is then recycled to a deionized water storage tank to be reused in the rinses again. The columns are backwashed and the regenerant undergoes further batch treatment to reduce chromium to a trivalent state, and finally evaporated. Solids from the evaporator and those settled out in the batch treatment tank are wastehauled.

#### July 1 – December 31, 2022

On July 7, 2022, OC San issued an NOV for a March 2022 zinc monthly average discharge limit exceedance. Since PCX collects and submits samples for laboratory analysis of all batches prior to discharge, PCX knew the March 2022 batch met the daily maximum discharge limits but neglected to check for compliance on the monthly average discharge limits. PCX noted that going forward they would verify compliance with all discharge limits prior to releasing the wastewater to the sewer.

#### January 1 – June 30, 2023

PCX had no 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 PCX's discharge and compliance status on a quarterly basis.

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

Performance Powder, Inc. (Performance Powder) precleans and powdercoats aluminum, steel, and galvanized steel. Operations include sandblasting, alkaline cleaning, zirconium conversion coating, rinsing, and powdercoating. Performance Powder discharges rinsewater to a multistage clarifier then to sewer, and collects solids for offsite disposal.

#### July 1 – December 31, 2022

Performance Powder had no violations during this reporting period.

#### January 1 – June 30, 2023

On June 1, 2023, OC San issued an NOV for March's zinc monthly average violation. On June 22, 2023, OC San conducted a compliance inspection to investigate the zinc violation. While Performance Powder could not readily identify a cause for the violation, it is in the process of investigating and providing a corrective action report during the next reporting period. Performance Powder had a zinc monthly limit discharge violation for May 2023 for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Performance Powder'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. Most of the manufacturing process is a dry operation. 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 – December 31, 2022

PDI had no violations during this reporting period.

#### January 1 – June 30, 2023

On June 6, 2023, PDI had a copper violation for which an NOV will be issued and enforcement will continue during the following reporting period.

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

#### **Pulmuone Foods USA, Inc. (East) (Permit No. 1-601443)**

Pulmuone Foods USA Inc. (East) (Pulmuone) manufactures, processes, and packages tofu products from flaked soy bean meal and softened water. The operations performed include mixing of soy bean meal into whey, filtration to separate soy milk, steam heating of soy milk, coagulation of soy milk and belt press drying, and for some products, cooking and/or flavoring of the tofu. Waste liquids from the processing of the soy material, cleaning and sterilization solutions from the process line equipment, and reject from their water softening units are sources of wastewater at this facility. Pulmuone employs a large, two-stage clarifier for the removal of solids and the separation of organic oils, in addition to pH adjustment. As of November 2022, Pulmuone expanded their wastewater treatment to include drum screening, two Moving Bed Biofilm Reactor (MBBR) units, a DAF unit, and a rotary screw press for dewatering, where pH adjustment occurs prior to the MBBR and DAF process units.

#### July 1 – December 31, 2022

On August 24, 2022, Pulmuone had a pH violation, for which an NOV was issued on September 13, 2022. A corrective action report was submitted on September 15, 2022. Pulmuone attributed the violation due to a delay in the delivery of their caustic soda order leading to inadequate pH adjustment. As part of their corrective action, Pulmuone had set up weekly deliveries for chemicals. Additionally, Pulmuone completed the installation of their new wastewater treatment system and has routed all wastewater to the new treatment system. On November 11, 2022, OC San conducted a compliance inspection to review the operation of Pulmuone's new wastewater treatment system. The new wastewater treatment system consists of a drum screen, two Moving Bed Biofilm Reactor (MBBR) units in parallel, a DAF unit, and a rotary screw press for dewatering. pH adjustment occurs prior to the MBBR and DAF process units. The

system is also set to shut down if the final pH drops below the set point. The new system has capacity to store excess process wastewater in the event of a system upset, so production may still proceed as operators address the issues.

#### January 1 – June 30, 2023

Pulmuone had no 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 Pulmuone'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.

In March 2021, Q-Flex exceeded the copper monthly average discharge limit for copper for which an NOV was issued in August 2021.

#### July 1 – December 31, 2022

On November 7, 2022, Q-Flex had a copper violation, for which an NOV was issued on December 1, 2022. This violation caused an exceedance in the copper monthly average discharge limit for November 2022.

On December 19, 2022, OC San conducted a 30-day resample and compliance inspection. Q-Flex noted that they recently began using an electric sanding machine to buff out bare copper panels, resulting in copper particles, which were then mopped up and discharged to the batch tank. OC San alerted Q-Flex that without a pretreatment system capable of treating copper, floor waste should be wastehailed along with the etching wastewater. Q-Flex noted the floors would be adequately vacuumed and swept prior to wet-cleaning, and that wet floor waste would be analyzed using a hand-held copper testing device and wastehailed upon any indication of copper contamination.

OC San will issue an NOV for the monthly average discharge limit exceedance in the next reporting period.

#### January 1 – June 30, 2023

On February 2, 2023, OC San issued an NOV for the November 2022 copper monthly average discharge limit exceedance. Q-Flex noted that corrective actions had been implemented to wastehaul any floor waste collected in areas where copper sanding takes place. Q-Flex also procured additional in-situ copper testing equipment to test each batch for copper prior to discharge, and maintains proper logs of each test and equipment calibration.

Q-Flex had no 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 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 above ground 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 above ground 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 wastehailed 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 wastehailed offsite.

#### July 1 – December 31, 2022

In July 2022, RBC exceeded the monthly average discharge limit for zinc, for which an NOV was issued on October 4, 2022. It was determined that zinc plated parts were being processed in both the tumbling and deburring operations, which flows to the sample point. As a result, RBC eliminated the process of placing zinc plated parts in the tumbling and deburring machines.

#### January 1 – June 30, 2023

RBC had no 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 RBC's discharge and compliance status on a quarterly basis.

#### **Robinson Pharma Inc. (Harbor North – H2) (Permit No. 1-600126)**

Robinson Pharma, Inc. (Robinson Pharma) is a pharmaceutical manufacturer of a variety of "nutraceutical" products. The operations at the Harbor North – H2 facility are dedicated to the production of solid dosage tablets, blending dry powders, two-piece hard shell encapsulation, and bulk packaging of final products. Powders are blended together then fed to compression or filling machines called encapsulators. Once filled, the capsules are sent to inspection and then to final packaging where they are case packed for shipping. For tablet production, a powder or granular mixture is prepared and fed to a die mold, then compressed by a rotary press. Tablets are then transferred to coating equipment where the tablets are introduced to a coating solution. The final stage is inspection and bulk or case packaging.

Wastewater is generated from washrooms and sinks used for washing of machines, equipment, and plastic barrels used for holding powder blends. Prior to any item being washed, it is cleaned via mechanical means in order to remove all solid debris and/or powder. There are additional sinks used for washing small tools. Wastewater is also generated from floor washing.

#### July 1 – December 31, 2022

Robinson Pharma had no violations during this reporting period.

#### January 1 – June 30, 2023

On January 31, 2023, OC San issued a late notice as OC San did not receive a wastewater discharge permit renewal application from Robinson Pharma for the Harbor North – H2 facility.

On March 1, 2023, OC San issued an order to terminate discharge for discharging without a valid permit, as OC San did not receive a permit renewal application from Robinson Pharma for the Harbor North – H2 facility, of which the previous permit had expired on February 28, 2023. OC San also noted that Robinson Pharma had multiple outstanding invoices which had not been paid, and that Permit No. 1-600126 would not be renewed until all outstanding invoices were paid in full. OC San also required Robinson Pharma to attend a compliance meeting on March 20, 2023.

On March 14, 2023, OC San issued an NOV for failing to comply with the order to terminate discharge dated March 1, 2023, as several on-site inspections determined that Robinson Pharma was continuing to discharge wastewater to the sewer without a valid permit. On March 17, 2023, OC San received payment for all outstanding invoices from Robinson Pharma and received the permit application.

On March 20, 2023, OC San held a compliance meeting with Robinson Pharma. Both the Harbor North – H2 and Harbor South – H1 facilities were discussed during this meeting. Representatives from Robinson Pharma stated they were unaware of permit application requirements, and were only made aware of the issue upon receipt of the March 1, 2023 order to terminate discharge. Robinson Pharma noted that the previous site contact and EHS Manager had not relayed information regarding past due invoices and permit

renewal requirements to the listed responsible officer and designated signatory, and had left the company on March 9, 2023. Robinson Pharma also shared that a company wide data breach due to a ransomware and cyberattack had taken place in September and October of 2022, requiring the transition to a new telephone and internet/email communication server. OC San noted that Robinson Pharma is required to maintain compliance with all permit conditions and discharge limits, which also includes requirements to submit payment for user charges upon invoice receipt. OC San also noted it that the individuals listed as the responsible officer and designated signatory are responsible for permit related matters, and are not relieved of their duties if overseen by other individual(s). Robinson Pharma noted that they would assign the appropriate personnel to ensure compliance with all regulatory requirements.

Permit No. 1-600126 was renewed and issued on April 1, 2023.

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

### **Robinson Pharma Inc. (Harbor South – H1) (Permit No. 1-511412)**

Robinson Pharma, Inc. (Robinson Pharma) is a pharmaceutical manufacturer of a variety of "nutraceutical" products. The operations at the Harbor South – H1 facility are dedicated to the production of softgel capsule and liquid supplement manufacturing. Products manufactured include a wide variety of animal oils, multivitamins, minerals, and botanicals. Liquid products include liquid collagen of various flavors. Raw materials of both liquid and dry powders are mixed in various size containers to achieve viscous liquid which is subsequently formulated to achieve various types of products and transferred to encapsulation lines.

Wastewater is generated from a reverse osmosis (RO) system, washing of processing equipment, and vacuum pump discharge. Robinson Pharma Inc. (Harbor South -H1) has six washrooms for cleaning and washing of tanks, lids, mixing paddles, sieve/screens, and buckets used during the blending processes and for holding fill material and gelatin mass. Wastewater is also generated from washing large gelatin melters and homogenizers/mixers in place, along with general floor washing.

#### July 1 – December 31, 2022

Robinson Pharma had no violations during this reporting period.

#### January 1 – June 30, 2023

On March 2, 2023, OC San issued a late notice as OC San did not receive a wastewater discharge permit renewal application from Robinson Pharma for the Harbor South – H1 facility. OC San also noted that Robinson Pharma had not kept current with required invoices, and that if Robinson Pharma desired to maintain its authorization to discharge industrial wastewater through a wastewater discharge permit to the sewer after March 31, 2023, Robinson Pharma must pay all debt obligations in full, successfully renew its industrial wastewater discharge permit, and pay the permit renewal fee (including late processing fees).

On March 7, 2023, OC San issued Robinson Pharma an administrative complaint for permit suspension (Administrative Complaint). This Administrative Complaint documented that Robinson Pharma was in arrears on OC San sewer use charges and associated penalties for late payment. The Administrative Complaint also required Robinson Pharma submit a financial security deposit, and recommended the permit suspension until all outstanding amounts and financial security deposits are paid. The Administrative Complaint also alerted Robinson Pharma of an administrative hearing for permit suspension to be held on March 27, 2023.

On March 20, 2023, OC San held a compliance meeting with Robinson Pharma. Both the Harbor North – H2 and Harbor South – H1 facilities were discussed during this meeting. Representatives from Robinson Pharma stated they were unaware of permit application requirements, and were only made aware of the issue upon receipt of the March 1, 2023 Order to Terminate for the Harbor North – H2 facility. Robinson Pharma noted that the previous site contact and EHS Manager had not relayed information regarding past due invoices and permit renewal requirements to the listed responsible officer and designated signatory, and had left the company on March 9, 2023. Robinson Pharma also shared that a company wide data breach due to a ransomware and cyber attack had taken place in September and October of 2022, requiring the transition to a new telephone and internet/email communication server. OC San noted that Robinson



Pharma is required to maintain compliance with all permit conditions and discharge limits, which also includes requirements to submit payment for user charges upon invoice receipt. OC San also noted it that the individuals listed as the responsible officer and designated signatory are responsible for permit related matters, and are not relieved of their duties if overseen by other individual(s). Robinson Pharma noted that they would assign the appropriate personnel to ensure compliance with all regulatory requirements. Robinson Pharma noted that their accounts payable department required prior notification for large payments, and had not been provided the invoices. OC San explained how sewer use charges are calculated at Robinson Pharma's request. OC San reminded Robinson Pharma of the upcoming administrative hearing scheduled for March 24, 2023, and that both the responsible officer and designated signatory were required to be in attendance as these two individuals were not present during this compliance meeting.

On March 23, 2023, OC San received payment for all outstanding invoices, including the required financial security from Robinson Pharma. OC San also received the permit application for Permit No. 1-511412. On March 24, 2023, OC San issued a letter cancelling the administrative hearing as Robinson Pharma had submitted payment for all outstanding invoices and financial security. Permit No. 1-511412 was renewed and issued on April 1, 2023.

On June 27, 2023, OC San received a letter requesting a review of sewer use charges between July 2022 and June 2023 from Robinson Pharma with respect to the applicability of water losses.

OC San will review and respond to the request regarding sewer use charges from Robinson Pharma during the next reporting period and will continue to monitor Robinson Pharma's discharge and compliance status on a quarterly basis.

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

Santana Services (Santana) is a small job shop that weld and braze 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 deox 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 requirement 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 to wastehaul all spent solution when solution is no longer within specifications and will only discharge the rinses.

#### **July 1 – December 31, 2022**

Santana had no violations during this reporting period.

#### **January 1 – July 30, 2023**

On January 6, 2023, Santana had violations for the daily average limit for chromium and copper, for which an NOV was issued on February 2, 2023. On February 15, 2023, Santana submitted a root cause and corrective action report stating that they were unable to determine the source of the violation. However, they noted that they had stopped running their rinses during processing to conserve water usage. Santana then proposed to resume running their rinses during processing. OC San responded that this practice is dilution and is not acceptable method to achieve compliance and required Santana to submit a revised corrective action report by February 23, 2023. During a compliance inspection on February 22, 2023, OC San reviewed the test strips that Santana had purchased for chromium and copper to perform field testing

prior to discharge. On February 28, 2023, Santana informed OC San that they will start testing each batch prior to discharge using the test strips and will wastehaul noncompliant wastewater. A follow up compliance inspection was conducted on March 29, 2023, to review the corrective actions that were implemented since the last inspection. Santana had cleaned out their process tanks, and had begun testing each batch for copper and chromium with test strips prior to discharge. On April 3, 2023, an NOV was issued for the January 2023 monthly limit violations for chromium and copper.

On May 25, 2023, OC San issued a compliance requirement letter to Santana requiring Santana to attend a compliance meeting as elevated levels of metals were detected in Santana's April SMR that potentially violates Santana's monthly limits for chromium and nickel, indicating that the corrective actions taken were insufficient at maintaining long term compliance. An NOV for the aforementioned monthly violations will be issued during the next reporting period. During the compliance meeting on June 14, 2023, the accuracy of Santana's contract laboratory, etching of the chromium and nickel from the aluminum product and the stainless-steel baskets and tanks, and improper drag out procedures were discussed as some potential causes of the violations. The need for a pretreatment system was also discussed due to the multiple violations observed. Santana had indicated that they were investigating alternative methods of disposal of their wastewater such as waste-hauling and utilizing an evaporator. On June 21, 2023, OC San issued a compliance requirement letter summarizing the discussion of the meeting, requiring Santana to provide a proposal for interim compliance by July 15, 2023, to conduct a wastewater characterization of their process tanks by July 31, 2023, and to provide a proposal for Santana's long term waste management plans by August 31, 2023.

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

### **Semicoa (Permit No. 1-571313)**

Semicoa is a medium size production and research and development facility that fabricates semiconductors for aerospace, commercial, medical, military, and telecommunication applications. Manufacturing process includes oxidation, diffusion furnace cleaning, photoresist, wafer etching, photoresist stripping, injection of various silicon dopants/electroconductive materials into the silicon dioxide substrate, vapor deposition, and glass etching. Wastewater is generated by the aqueous rinsing following the acid cleaning, acid etching, and solvent cleaning process steps, the disposal and pH neutralization of the various spent acidic solutions, reverse osmosis reject, and the cooling tower bleed. Wastewater treatment consists of a pH neutralization system with automated pH controls, setpoint alarms, and recirculation plumbing in the event of a setpoint exceedance.

In October 2021, OC San conducted a compliance inspection to review potential dilution processes and inadequacy of the existing sample point that was observed during previous inspections. During the inspection, OC San noted that a proper grab sample for Total Toxic Organics cannot be achieved as the clean out used as a sample point does not provide sufficient space to collect representative grab samples. In addition, OC San noted that the secondary containment that collects condensate from the liquid nitrogen area also collects and discharges stormwater into the sewer system, which is in violation of OC San's Ordinance. OC San issued a compliance requirement letter in October 2021, requiring Semicoa to provide a proposal to install a representative sample point and to provide a proposal to mitigate stormwater discharge. Semicoa submitted their proposal in November 2021 and a revised proposal in January 2022. Semicoa proposed to install a sample point immediately downstream of the neutralization system and route all dilution flows downstream of the sample point. Semicoa also proposed to construct a leach pit to discharge the nitrogen condensate and any stormwater collected in the secondary containment. In March 2022, OC San accepted Semicoa's proposal. In May 2022, OC San conducted a compliance inspection to verify the completion of the proposal implementation. OC San observed that the cooling tower blowdown is still discharging to the sample point and requested Semicoa to reconfigure this line to discharge downstream of the sample point. All other aspects of the proposal were implemented as proposed.

### **July 1 – December 31, 2022**

On July 7, 2022, Semicoa informed OC San that the reconfiguration had been completed. Semicoa had no violations during this reporting period. As of December 31, 2022, this permit is no longer active as Semicoa

now operates under a new Class 1 permit due to a change of ownership. Therefore, no further enforcement is required at this time and this enforcement case is closed.

Santana had no violations during this reporting period.

#### **SFPP, LP (Permit No. 1-021619)**

SFPP, LP (SFPP) provides bulk storage and distribution of refined petroleum products and fuel additives. The facility includes above ground storage tanks of various sizes that contain gasoline, diesel, ethanol, and fuel additives. Wastewater is generated from tank bottom water draws and drainage at the loading racks.

During a compliance inspection in December 2021, OC San noted that stormwater comingles with process wastewater and discharged to the sewer. OC San informed SFPP that the discharge of stormwater to the sewer is prohibited and that the facility is required to address this non-compliance issue. In March 2022, OC San issued an NOV for violating the prohibition on stormwater discharge to the sewer, requiring SFPP submit a proposal to prevent the discharge of the stormwater to the sewer.

#### **July 1 – December 31, 2022**

On September 2, 2022, OC San received SFPP's proposal to prevent stormwater discharge to the sewer which included capturing the stormwater, pumping to a holding tank, and wastehauling the stormwater. An additional flow diagram was received on October 13, 2022.

#### **January 1 – June 30, 2023**

On January 26, 2023, OC San issued a compliance requirement letter, accepting SFPP's proposal to prevent discharge of stormwater to sewer. SFPP had no 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 SFPP's discharge and compliance status on a quarterly basis.

#### **Shepard Bros., Inc. (Permit No. 1-031034)**

Shepard Bros., Inc. (Shepard Bros.) is a soap and detergent manufacturer that blends both liquid and dry components into a complete line of wet and dry cleaning products for the food and dairy industry. All products are produced by a "batch process" and packaged in either plastic barrels, lined cardboard barrels, totes or gallon jugs. The two blending process uses approximately 400 compounds, including liquid and powdered acids, alkalis, additives, chelants and phosphates are handled and stored at the site. The liquid process involves the addition of various additives, chelants, phosphates, etc. to water and blending in large tanks. This is followed by the addition of either acids or alkalis depending on the type of product. The only wastewater generated from this process is an occasional small amount of tank and hose rinsate. The process to produce powder products uses powdered acids, alkalis, chelants, etc. to make the various floor cleaners, laundry detergents, sanitizers, and cleaners, which are blended in the powder blender. There is no wastewater produced in this process. Shepard Brothers operates a manual batch pretreatment system. The pH is adjusted with caustic soda.

#### **July 1 – December 31, 2022**

Shepard Bros had no violations during this reporting period.

#### **January 1 – June 30, 2023**

On March 28, 2023, Shepard Bros. had an instantaneous and daily average O&G-min. exceedance for which a NOV was issued on May 2, 2023. On May 30, 2023, OC San conducted a compliance inspection at Shepard Bros. to investigate the root cause of the O&G-min violation. During the inspection, the pretreatment system appeared to be well-maintained and operating normally. On June 9, 2023, Shepard Bros. submitted a corrective action report, attributing the O&G-min. violation to interference from a non-petroleum raw material most likely present in their wastewater. Shepard Bros. reported that interference could be attributed to a wide variety of surfactants and solvents used in their manufacturing process and provided a previous study of non-petroleum raw materials conducted at their facility. The study

demonstrated that Shepard Bros. laboratory analyzed samples by Infrared Spectroscopy (IR) that could produce positive O&G-min. results and not be of mineral or petroleum origin. Additional samples collected by Shepard Bros. as part of their recent investigation and the resample collected by OC San both showed compliant levels of O&G-min. Shepard Bros. will continue to monitor their production records and conduct O&G-min. sampling.

Shepard Bros. had no further O&G-min 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 Shepard Bros. discharge and compliance status on a quarterly basis.

#### **Sioux Honey Association (Permit No. 2-022654 )**

Sioux Honey Association (Sioux Honey) is manufacturer of wholesale honey products. Wastewater is generated from the washdown of drums, equipment and filling line, lubrication of fill lines, boiler blowdowns, DI regeneration and a hand sink in the machine shop. Wastewater primarily comes from daily flushes of the filling line and drum wash line. Wastewater is discharged through several floor drains, which collects in a three-stage clarifier prior to discharge to the sewer. Sioux Honey does not have a pretreatment system.

Sioux Honey had a pH violation in April 2022. Sioux Honey attributed the pH violation to a mixture of honey and water that was discharged to the sewer. OC San conducted a compliance inspection in June 2022 to review the manufacturing process. During the inspection, OC San observed the cleaning process of the filling lines where the first flush that contains a mixture of honey and water is typically collected and reprocessed. Sioux Honey indicated that an operator may have prematurely switched over from the first flush container over to the floor drain, thus discharging a mixture of honey and water into the sewer system. As a corrective action, Sioux Honey has purchased a handheld pH meter and will perform periodic pH checks to ensure discharge is compliant.

#### **July 1 – December 31, 2022**

Sioux Honey had no violations during this reporting period.

#### **January 1 – June 30, 2023**

Sioux Honey had a pH violation on May 18, 2023, for which an NOV was issued on June 1, 2023. OC San required Sioux Honey to provide a root cause analysis and corrective action report by June 15, 2023. OC San issued a compliance requirement letter on June 15, 2023, requiring Sioux Honey submit a proposal for a pH adjustment system and to inform Sioux Honey that their Class 2 permit will be converted to a Class 1 permit due to the repeated pH violations.

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

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

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

#### **July 1 – December 31, 2022**

On November 2, 2022, South Coast Baking had a pH violation, for which an NOV was issued on December 1, 2022. On December 16, 2022, South Coast Baking submitted their corrective action report, attributing the root cause of the pH violation to a buildup of residual solids on the pH probes. As a corrective action, South Coast Baking instituted a protocol to clean the pH probes on a daily basis and install replacement

probes on a semi-annual basis regardless of condition. On December 28, 2022, OC San conducted a compliance inspection and to verify the effectiveness of corrective actions implemented onsite. Resample results showed compliant levels of pH.

#### January 1 – June 30, 2023

South Coast Baking had no violations during this period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

#### **South Coast Circuits, Inc. (Bldg 3500 Ste A) (Permit No. 1-601444)**

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

The manufacturing of a typical multilayer product begins at Building 3500, Suite A with the inner-layer circuit development including surface preparation, photoresist application, circuit imaging, and resist developing. The boards move on to Building 3506, Suite A for cupric chloride etching and resist stripping; lamination and drilling at Building 3524, Suite A; followed by permanganate desmear and electroless copper plating at Building 3512, Suite A. Outer-layer circuit development may continue at this point by either panel plate or pattern plate process steps. Panel plate proceeds with copper plating at Building 3512 Suite A, photoresist application, circuit imaging, and resist developing at Building 3524 Suite A, and cupric etching at Building 3506 Suite A. Pattern plate proceeds with photoresist application, circuit imaging, resist developing at Building 3500 Suite A, copper plating and tin resist plating at Building 3512 Suite A, and ammonium etching and tin stripping at Building 3506 Suite A. Final surface finishing, such as nickel/gold plating and hot air solder leveling, is conducted in Building 3506 Suite A and Building 3524 Suite A, respectively. The boards typically return to Building 3500 Suite A for legend screening before completion.

The effluent discharge at Building 3500, Suite A under this permit is generated by the photoresist and solder mask developing solutions and the rinses following the acid cleaning, aluminum oxide surface preparation, photo-film developing, photoresist developing, solder mask developing, and screen cleaning. Pretreatment consists of an automatic pH adjustment system.

#### July 1 – December 31, 2022

On September 1, 2022, OC San issued an NOV for the June 2022 silver monthly average discharge limit exceedance. In a corrective action report submitted on September 12, 2022, SSCI determined that elevated silver concentration was due to failure of a filter replacement. As a corrective action, SSCI has replaced the filter and SSCI's following SMR sample showed compliance.

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

#### January 1 – June 30, 2023

Based on a conversation conducted in May 2023, it was noted and determined that a change in ownership had occurred in May of 2022, of which OC San was not notified. On May 23, 2023, OC San issued an NOV for failing to notify of a change in ownership. SSCI submitted a new Class 1 Wastewater Discharge Permit application, and a new permit was issued to the new owners under Permit No. 1-602000. Therefore, no further enforcement is required at this time and this enforcement case is closed.

#### **South Coast Circuits, Inc. (Bldg 3506 Ste A) (Permit No.1-601446)**

South Coast Circuits, Inc. (SCCI) manufactures rigid double-sided and multilayer printed circuit boards to customers specifications from copper clad and pre-preg materials. SSCI performs their operations in four

buildings all located within the same industrial complex (Bldg 3500 A, Bldg 3506 Ste A, Bldg 3512 Ste A, and Bldg 3524 Ste A). Discharges from all buildings are regulated by separate permits.

The manufacturing of a typical multilayer product begins at Bldg 3500 Ste A with the inner-layer circuit development including surface preparation, photoresist application, circuit imaging, and resist developing. The boards move on to Bldg 3506 Ste A for cupric chloride etching and resist stripping; lamination and drilling at Bldg 3524 Ste A; followed by permanganate desmear and electroless copper plating at Bldg 3512 Ste A. Outer-layer circuit development may continue at this point by either panel plate or pattern plate process steps. Panel plate proceeds with copper plating at Bldg 3512 Ste A, photoresist application, circuit imaging, and resist developing at Bldg 3524 Ste A, and cupric etching at Bldg 3506 Ste A. Pattern plate proceeds with photoresist application, circuit imaging, resist developing at Bldg 3500 Ste A, copper plating and tin resist plating at Bldg 3512 Ste A, and ammonium etching and tin stripping at Bldg 3506 Ste A. Final surface finishing, such as nickel/gold plating and hot air solder leveling, is conducted in Bldg 3506 Ste A and Bldg 3524 Ste A, respectively. The boards typically return to Bldg 3500 Ste A for legend screening before completion.

The wet processes conducted at South Coast Circuits Bldg 3506 Suite A include acid cleaning, ammonium and cupric etching, resist stripping, microetch, nickel/gold plating, silver coating, and tin stripping.

July 1 – December 31, 2022

SCCI had no violations during this reporting period.

January 1 – June 30, 2023

Based on a conversation conducted in May 2023, it was noted and determined that a change in ownership had occurred in May of 2022, of which OC San was not notified. On May 23, 2023, OC San issued an NOV for failing to notify of a change in ownership. SCCI submitted a new Class 1 Wastewater Discharge Permit application, and a new permit was issued to the new owners under Permit No. 1-602001. Therefore, no further enforcement is required at this time and this enforcement case is closed.

#### **South Coast Circuits, Inc. (Bldg 3512 Ste A) (Permit No. 1-601445)**

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

The manufacturing of a typical multilayer product begins at Bldg 3500 Ste A with the inner-layer circuit development including surface preparation, photoresist application, circuit imaging, and resist developing. The boards move on to Bldg 3506 Ste A for cupric chloride etching and resist stripping; lamination and drilling at Bldg 3524 Ste A; followed by permanganate desmear and electroless copper plating at Bldg 3512 Ste A. Outer-layer circuit development may continue at this point by either panel plate or pattern plate process steps. Panel plate proceeds with copper plating at Bldg 3512 Ste A, photoresist application, circuit imaging, and resist developing at Bldg 3524 Ste A, and cupric etching at Bldg 3506 Ste A. Pattern plate proceeds with photoresist application, circuit imaging, resist developing at Bldg 3500 Ste A, copper plating and tin resist plating at Bldg 3512 Ste A, and ammonium etching and tin stripping at Bldg 3506 Ste A. Final surface finishing, such as nickel/gold plating and hot air solder leveling, is conducted in Bldg 3506 Ste A and Bldg 3524 Ste A, respectively. The boards typically return to Bldg 3500 Ste A for legend screening before completion.

The effluent discharge at Bldg 3512 Ste A is generated by aqueous fume scrubbing, various spent process solutions and associated rinse wastestreams, regeneration of the ion exchange rinse recirculation system, and the occasional batch treatment.

July 1 – December 31, 2022

SCCI had no violations during this reporting period.

January 1 – June 30, 2023

Based on a conversation conducted in May 2023, it was noted and determined that a change in ownership had occurred in May of 2022, of which OC San was not notified. On May 23, 2023, OC San issued an NOV for failing to notify of a change in ownership. SCCI submitted a new Class 1 Wastewater Discharge Permit application, and a new permit was issued to the new owners under Permit No. 1-602002. Therefore, no further enforcement is required at this time and this enforcement case is closed.

**South Coast Circuits, Inc. (Bldg 3524 Ste A) (Permit No. 1-601447)**

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

The manufacturing of a typical multilayer product begins at Bldg 3500 Ste A with the inner-layer circuit development including surface preparation, photoresist application, circuit imaging, and resist developing. The boards move on to Bldg 3506 Ste A for cupric chloride etching and resist stripping; lamination and drilling at Bldg 3524 Ste A; followed by permanganate desmear and electroless copper plating at Bldg 3512 Ste A. Outer-layer circuit development may continue at this point by either panel plate or pattern plate process steps. Panel plate proceeds with copper plating at Bldg 3512 Ste A, photoresist application, circuit imaging, and resist developing at Bldg 3524 Ste A, and cupric etching at Bldg 3506 Ste A. Pattern plate proceeds with photoresist application, circuit imaging, resist developing at Bldg 3500 Ste A, copper plating and tin resist plating at Bldg 3512 Ste A, and ammonium etching and tin stripping at Bldg 3506 Ste A. Final surface finishing, such as nickel/gold plating and hot air solder leveling, is conducted in Bldg 3506 Ste A and Bldg 3524 Ste A, respectively. The boards typically return to Bldg 3500 Ste A for legend screening before completion.

The effluent discharge at Bldg 3524 A operates its own conventional continuous pretreatment system for rinsewaters and a batch treatment system for spent solutions. The continuous system utilizes an equalization tank which is plumbed via pump to a precipitation tank. The wastewater undergoes pH adjustment, followed by sulfide, then polymer addition. Solids are then separated in a lamella clarifier. Overflow from the lamella flows to the sample point. Solids are pumped to the batch treatment tank for sludge thickening. The thickened sludge is then pumped through a filter press and the filtrate is discharged directly to the sample point. Spent solutions are batch treated by caustic addition, sulfide, and polymer. The solution is mixed and allowed to settle. The contents of the tank are then run through the filter press and the filtrate held in the tank until confirmation that the batch is within limits, then discharged.

**July 1 – December 31, 2022**

SCCI had no violations during this reporting period.

**January 1 – June 30, 2023**

Based on a conversation conducted in May 2023, it was noted and determined that a change in ownership had occurred in May of 2022, of which OC San was not notified. On May 23, 2023, OC San issued an NOV for failing to notify of a change in ownership. SCCI submitted a new Class 1 Wastewater Discharge Permit application, and a new permit was issued to the new owners under Permit No. 1-602003. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

Stainless Micro-Polish, Inc. (SMP) performs metal finishing operations for medical and scientific instruments. 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 solid dewatering.

SMP had a monthly zinc violation in June 2022.

#### July 1 – December 31, 2022

On September 1, 2022, OC San issued an NOV for the June 2022 monthly nickel limit exceedance. SMP submitted a root cause analysis and corrective action report on September 15, 2022. SMP investigated their system and was not able to identify a specific cause of the violation. SMP concluded that the violation was due to operator error in their treatment system. SMP has a daily check list that ensures that the system is kept clean, and all instrumentation are calibrated. Recent sampling showed compliance with permit limits and a decrease in the nickel concentration level. SMP had no further violations during this reporting period.

#### January 1 – June 30, 2023

SMP had no 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 SMP's discharge and compliance 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.

From 2019 to 2020, Star has had chronic O&G-min. violations while optimizing the zeolite column treatment system and installing a final holding tank. 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 oil & grease. Star also indicated that jar testing has 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.

#### July 1 – December 31, 2022

On October 13, 2022, Star had an O&G-min. violation, for which an NOV was issued on October 25, 2022. On November 22, 2022, OC San issued a compliance requirement letter requiring Star to attend a compliance meeting on December 14, 2022, to discuss the recent violations. During the compliance meeting, Star and OC San discussed the requirements to sample every batch prior to discharge due to inconsistent analytical results and the potential to exceed discharge limits. Both OC San and Star were concerned that OC San's sampling results were higher than Star's sample results for samples drawn from the same batch. The higher results resulted in discharge limit exceedances. During the discussion, differences in sampling for SMR samples were noted, which included improperly preserved SMR samples, different size and number of containers used for testing, and lack of homogeneity of the batch.

#### January 1 – June 30, 2023

On January 10, 2023, OC San issued a compliance requirement letter requiring Star to submit a modified pretreatment system proposal by February 15, 2023, for review and acceptance by OC San with a time schedule for the implementation of the corrective actions by March 30, 2023. Star requested an extension on February 13, 2023, for time to properly evaluate alternatives. Star has provided preliminary system drawings and information to OC San and coordination for approval of a revised system is anticipated to continue into the next reporting period.



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

**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 waste streams 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 stated that Statek would need to evaluate the adequacy of the pH adjustment system with the additional flow.

July 1 – December 31, 2022

On December 8, 2022, OC San issued Statek a compliance requirement letter to submit pH data collected from process waste streams during Statek's investigation, to provide information on the mixing in the pH tank, and to provide information related to the use of a city water line to prime the pump located in the final stage of the pH adjustment system, including a justification for the use of this water and the flow rate, by January 13, 2023.

January 1 – June 30, 2023

As a result of inadequate information submitted on January 13, 2023, OC San issued a compliance requirement letter on April 25, 2023, requiring Statek to provide additional information on the pH adjustment tank, updated drawings, and an updated operations and maintenance manual by June 1, 2023. Statek submitted required documentation by June 1, 2023, which OC San is currently reviewing.

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

**Statek Corporation (Orange Grove) (Permit No. 1-521777)**

Statek Corporation (Orange Grove) (Statek) designs and manufactures ultra-miniature quartz crystals and crystal oscillators using photochemical etching and laser frequency adjustment techniques. These products are produced in the smallest packages available using semiconductor technology. Statek products are utilized in communications, medical electronics, industrial controls, and precision military application devices. The manufacturing process includes the cutting of quartz bars to create quartz wafers, lapping and surface polishing, photolithography to pattern multiple resonators on each wafer, chemical etching, and vacuum deposition where electrode patterns of nickel, chrome or aluminum are deposited. Individual resonators are then diced from the wafer and mounted in a ceramic package and hermetically sealed. If the product is an oscillator, then the crystal would be packaged with an IC to create a finished oscillator. As the final step, each resonator is electrically tested to ensure that it is within customer specifications. Crystals are packed for shipment in tubes, trays, and in tape-and-reel configurations. The spent photochemicals are collected and shipped off-site for disposal. Wastewater from process rinses is collected and adjusted for pH prior to discharge through a clarifier and into the sewer. Gold and chrome etching wastes are wastehauled.

July 1 – December 31, 2022

On August 16 and 17, 2022, Statek had pH violations, for which an NOV was issued on August 30, 2022. A permit renewal inspection was conducted on August 9, 2022. Following the inspection and violation, OC San issued Statek permit conditions to provide an operations and maintenance manual for its pretreatment system and updated facility drawings. The previously provided information was outdated and did not include sufficient detail on facility layout and operations. Statek submitted the required information on October 29, 2022.

#### January 1 – June 30, 2023

Statek was issued a compliance requirements letter to attend a compliance meeting on March 23, 2023, due to having multiple pH violations in a six-month period. During the compliance meeting on April 19, 2023, Statek explained that they were unable to determine the cause of the violation as the system is designed to self-correct. Statek noted that they have adjusted the pH set point to adjust pH to between 8.0 and 9.5 using caustic soda and sulfuric acid and to hold a batch for five minutes to ensure pH is properly adjusted prior to discharge. Statek said they set pH alarms to notify the operators if the system is out of range. Statek explained that they are using two pH probes with one probe in the treatment tank and one probe at the sample point and that the probes are calibrated monthly. OC San noted to Statek that three pH probes, calibrated more frequently, may improve monitoring and that proper mixing should be observed by Statek as insufficient mixing may inhibit pH adjustment. Statek also noted that they have simplified the operations manual for their staff to make it easier to understand and implement the proper procedures to maintain pH limits and that the system will cease to discharge if pH is noncompliant. On June 15, 2023, OC San issued a compliance requirement letter requesting additional information, including but not limited to, the operations of pH adjustment tank, process layout, and operations and maintenance manual, by July 31, 2023.

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

#### **Stepan Company (Permit No. 1-021674)**

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

During a routine inspection in May 2021, OC San was informed that Stepan discharges their 'first flush' of stormwater into the sewer system, which is prohibited by OC San's Ordinance. In June 2021, OC San conducted a compliance inspection and verified that the 'first flush' of stormwater captured in secondary containments and surface runoffs of outdoor processing areas were transferred to Stepan's wastewater collection system and eventually discharged to the sewer. OC San issued a compliance requirement letter in July 2021 requiring Stepan to provide a proposal to mitigate their stormwater discharge. Stepan provided a proposal in August 2021 to install rain gauge, automatic three-way valves and pumps, as well as reconfiguring part of their discharging piping to divert stormwater to their stormwater system. Stepan also submitted a revised proposal in November 2021 to halt automatic conveyance of process and stormwater and will manually transfer the collected water to the stormwater system once the valves have been diverted. Stepan had requested that OC San allow them to complete the piping changes by October 2022 so they can conduct the work during the planned shutdown.

#### July 1 – December 31, 2022

On October 3, 2022, Stepan submitted a revised stormwater mitigation proposal. The revised proposal utilizes best management practices along with Stepan's existing infrastructure to divert stormwater. The revised proposal eliminates the installation of the new diversion valves as Stepan now proposed to collect any comingled stormwater in the existing clarifier, and divert the flow from the clarifier to the rain tanks. Stepan will suspend automatic conveyance from plant sumps during the rain event and will only start pumping any stormwater water collected when the rain gauge is activated, and the existing diversion valve is configured to discharge into the rain tanks.

#### January 1 – June 30, 2023

On January 5, 2023, Stepan informed OC San that there has been a change in Stepan's management team and that they will submit a revised proposal to mitigate stormwater discharge to the sewer. On February 1, 2023, Stepan submitted a revised proposal that provides interim compliance while Stepan continues to evaluate their long-term solution. Stepan proposes to wash down all roadways, process and stormwater

sumps, and process and storage areas to the clarifier prior to a storm event. All process wastewater in the clarifier will then be transferred to the wastewater storage tank. Stepan intends to have all sumps and clarifier empty prior to a storm event so any water collected in these areas can be discharged to the storm drain. Stepan will also suspend discharge from their Fenton system until after the storm event. If the collected stormwater cannot be discharged to the storm drain, Stepan will containerize it and will consider alternative disposal methods. On May 15, 2023, OC San issued a compliance requirement letter which accepted Stepan's proposal and required Stepan to keep an onsite log for the disposal of their stormwater discharges.

On May 2, 2023, Stepan had a 1,4-dioxane violation for which an NOV was issued on May 24, 2023. OC San required Stepan to provide a root cause analysis and corrective action report by June 15, 2023. On June 16, 2023, Stepan submitted their root cause analysis and corrective action report attributing the violation to their uncalibrated analytical instrumentation that provided inaccurate results for Stepan's internal sample. Stepan's internal sample reported a result of 0.5 mg/L, which Stepan then proceeded to discharge as results indicated that their discharge was within their permit limit. As part of their corrective actions, Stepan recalibrated their analytical equipment and implemented scheduled calibration at 6 month intervals. Stepan also conducted verification test after calibration to ensure that their equipment provided accurate and reliable results. A compliance inspection was conducted on June 21, 2023. During the inspection, Stepan indicated that they continue to collect internal samples and conduct studies to determine if their current sampling and analysis procedures are producing reliable results. A resample showed compliant levels of 1,4-dioxane.

Stepan 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 Stepan'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 waste stream is further treated by another set of ion exchange system to produce deionized water that is re-used for their production. Unrecycled treated unchelated and chelated 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 batch treatment, while regeneration waste for the deionized water production is discharged to the final discharge tank for pH adjustment. Batch treatment is also conducted for all spent solutions and other miscellaneous waste streams. 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. OC San conducted a compliance inspection in September 2021 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 exceedance. OC San issued a compliance requirement 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 requirement letter in March 2022 to require Summit to conduct multiday self-monitoring, provide updated pretreatment system drawings and operation and maintenance

(O&M) manual. Multi-day self-monitoring demonstrated continuous compliance and Summit submitted the updated pretreatment system drawings in April 2022. However, Summit was not able to provide an updated O&M manual by the deadline. OC San extended the deadline for the O&M manual to Jun 2022. In June 2022, Summit provided a draft procedure of their treatment operations, but the submitted procedure did not satisfy the requirement for the O&M manual. OC San requested that Summit submit a revised O&M manual by July 15, 2022.

#### July 1 – December 31, 2022

Summit submitted their revised O&M manual on July 14, 2022. Summit had no violations during this reporting period.

#### January 1 – June 30, 2023

On June 21, 2023, Summit had a copper violation. An NOV will be issued and enforcement will continue during the next reporting period.

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

#### **Superior Connector Plating, Inc. (Permit No. 1-021090) formerly Superior Plating**

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

In May 2022, Superior Connector Plating had a cadmium violation. Superior Connector Plating attributed the source of the violation to incomplete settling time of the batch treatment. Superior Connector Plating noted that the operator only allowed 30 minutes of settling instead of an hour and has since retrained their operators to ensure proper settling prior to discharge.

#### July 1 – December 31, 2022

OC San conducted a compliance inspection on July 6, 2022. During the inspection, OC San reviewed the waste treatment system and observed that the discharge pipe may be extended below the sludge layer, thus causing solids to carry over. Superior Connector Plating informed OC San that the discharge levels are manually controlled by valves, thus is not likely the cause of the violation. On October 27, 2022, Superior Connector Plating had another cadmium violation, for which an NOV was issued on November 8, 2022. Superior Connector Plating attributed this violation to carry over of solids from the lamella clarifier. Superior Connector Plating had collected internal samples and noticed that there were significant levels of Cadmium coming from the lamella clarifier, which is downstream of their batch treatment tank where they typically conduct internal sampling prior to discharge. During a compliance inspection on November 29, 2022, Superior Connector Plating indicated that they had cleaned out the lamella clarifier and their internal testing showed compliant levels from the lamella clarifier and batch treatment tank. OC San also observed that Superior Connector Plating conducted their pH adjustment at a fixed pH of 9. OC San recommended that Superior Connector Plating conduct jar testing prior to each batch to determine the optimal treatment pH as influent concentration varies depending on their workload. As part of their corrective actions, Superior Connector Plating will implement a maintenance plan for the lamella clarifier, will maintain a log for the cleanings, and will implement jar testing prior to the treatment of each batch. The resample showed compliant levels of cadmium.

January 1 – June 30, 2023

Superior Connector Plating had no 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 Superior Connector Plating's discharge and compliance status on a quarterly basis.

**Superior Processing (2) (Permit No. 1-601701)**

Superior Processing (2) is a metal plating job shop specializing in electroless nickel/immersion gold, electrolytic nickel/gold, electrolytic and immersion silver, and immersion tin plating on customer supplied printed circuit boards. Wastewater is generated from process tanks and rinse water. Wastewater is segregated into two wastestreams: one for metal bearing waste and one for cyanide bearing waste. Non-cyanide metal bearing treatment consists of pH adjustment, filtration, activated carbon, and ion exchange. Cyanide treatment consists of ion exchange before being stored in an evaporation tank prior to being hauled off site.

July 1 – December 31, 2022

Superior Processing (2) had a cyanide violation for exceeding the daily average limit on December 13, 2022. An NOV will be issued during the next reporting period.

January 1 – June 30, 2023

On January 12, 2023, OC San issued an NOV to Superior Processing (2) for the daily average cyanide violation from the last reporting period.

On January 26, 2023, OC San conducted a compliance inspection, to investigate the root cause of the cyanide violation from December 2022. The likely root cause of the violation is from dragout coming from the cyanide bearing process tanks. Cyanide bearing process tanks are in close vicinity to other process tanks and rinse tanks and a part treated with cyanide likely was suspended over a rinse tank allowing cyanide bearing waste into a non-cyanide bearing rinse tank. On February 22, 2023, Superior Processing (2) submitted a corrective action report. Superior Processing (2) retrained all operators regarding the handling of cyanide bearing wastewater, marked drums designated for cyanide bearing wastewater, created covers for rinse tanks that could possibly get contaminated with cyanide bearing wastewater, and disconnecting the cyanide rinse tank from the heavy metal wastewater treatment stream. On March 6, 2023, OC San issued an NOV to Superior Processing (2) for exceeding the monthly average discharge limit for cyanide in December 2022.

Superior Processing (2) 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 Superior Processing (2)'s discharge and compliance status on a quarterly basis.

**Tawa Services, Inc. (Bakery Central Kitchen) (Permit No. 1-601895)**

Tawa Services, Inc. (Bakery Central Kitchen) (Tawa BCK) is a commercial bakery which produces baked goods consisting of cakes, cookies, breads, muffins, and baked goods for purchase at Tawa Services, Inc. brand supermarkets (such as Walong Market, 99 Ranch, etc.). Ingredients are mixed and weighed according to recipes to form a cake mix or dough. Cakes and cookies are placed on sheet trays or in molds, while muffins are placed in muffin tins, then baked and packaged for distribution. Dough for breads and baked goods is formed and proofed prior to baking. After baking, the baked goods are allowed to cool prior to packaging, storage, and shipment. Wastewater is generated from the cleaning/washing/rinsing/sanitization of the mixers, process equipment, loaf pans/sheet trays, and floor wastes. Wastewater flows to a two-stage underground clarifier along the north side of the facility.

On January 12, 2022, OC San conducted an industrial waste survey, in which it was determined Tawa BCK warranted a Class 1 Wastewater Discharge Permit. Following several correspondence requesting the submittal of a permit application, one was not received.

June 1 – December 30, 2022

On December 8, 2022, OC San issued an NOV to Tawa BCK for discharging wastewater without a valid wastewater discharge permit. OC San directed Tawa BCK to submit a permit application by December 30, 2022. A Class 1 Wastewater Discharge Permit Application was received on December 29, 2022.

January 1 – June 30, 2023

OC San issued Permit No. 1-601895 to Tawa BCK on April 1, 2023. Tawa BCK had no 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 Tawa BCK'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, and 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. Following several correspondence requesting the submittal of a permit application, one was not received.

June 1 – December 30, 2022

On December 8, 2022, OC San issued a NOV to Tawa FPMC for discharging wastewater without a valid permit. OC San directed Tawa FPMC to submit a permit application by December 30, 2022. A Class 1 Wastewater Discharge Permit Application was received on December 29, 2022.

January 1 – June 30, 2023

OC San issued Permit No. 1-601895 to Tawa FPMC on April 1, 2023. Tawa FPMC had no 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 Tawa FPMC's discharge and compliance status.

**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.

The treatment system at Thermal-Vac consists of two ion exchange systems, a batch treatment system, and a final neutralization tank. The treated water in the DI Holding Tank is used to replenish the drag-out tanks. After hydroxide precipitation and settling, discharge from the batch treatment tank is processed through a filter press. The filtrate is combined with non-metal bearing waste streams in the pH neutralization tank and then discharged to the sewer. Concentrated process tanks are replenished and hauled when useful life has been exceeded.

#### July 1 – December 31, 2022

On August 2, 2022, Thermal-Vac had a nickel daily average limit exceedance for which an NOV was issued on September 22, 2022. The violation also resulted in a monthly exceedance for nickel for which an NOV will be issued during the next reporting period. An inspection of the facility on September 16 and 17, 2022, indicated inconsistencies between operations and facility drawings and information previously provided by Thermal-Vac, particularly regarding the nickel operations. OC San issued a compliance requirement letter on December 13, 2022, requiring Thermal-Vac to attend a compliance meeting on January 25, 2023.

#### January 1 – June 30, 2023

During the compliance meeting on January 25, 2023, it was determined that further clarity on the processes, flows, and treatment was needed. OC San issued a compliance requirement letter on March 8, 2023, requiring Thermal-Vac to provide updated, detailed drawings, an updated tank schedule, a water balance diagram, and a wastewater characterization. The updated drawings and tank schedule were submitted March 24, 2023 as part of the permit renewal application. The final water balance was submitted April 18, 2023. The wastewater characterization was not performed as noted in the requirements and is being completed in June. Results are anticipated in the next reporting period.

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

#### **Thompson Energy Resources, LLC (Brea) (Permit No. 1-601469)**

Thompson Energy Resources, LLC (Brea) (Thompson) produces crude oil from multiple well sites, separating ground water from the extracted oil with heat and chemical treatment. Resultant water is then discharged to the sewer system.

The produced water goes through heat treatment in the heat room followed by storage in the wash tank. The water from the wash tank is routed to the surge tank which is one of the first steps in the chemical treatment of the wastewater on-site. This is followed by storage in one of the two wastewater storage tanks. One of these storage tanks has been out of service for a few years and the new ownership is currently working on putting it back in service to improve the final effluent's temperature and additionally help with the separation of oil & grease.

#### July 1 – December 31, 2022

On April 14, 2022, Thompson had an O&G-min. violation for which an NOV was issued on July 21, 2022. On August 31, 2022, OC San conducted a compliance inspection to investigate the root cause of the O&G-min. violation. During the inspection, Thompson attributed the O&G-min. violation to a decreased retention time in the pretreatment system holding tank as well as an increase in wastewater production from a new well. As a corrective action, Thompson will install a second holding tank to enhance solids recovery and increase retention time prior to discharge. In addition, the new well will be configured offline to decrease oil and wastewater production. While the new well has been configured offline, installation of the second holding tank has been delayed due to permitting and availability of funding. The second holding tank installation is projected to be completed during the first quarter of 2023. OC San will continue to follow-up with Thompson on completing the installation of the second holding tank during the next reporting period.

January 1 – June 30, 2023

Thompson had no 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 Thompson'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 wastehailed offsite.

From 2018 through 2020, TTM Technologies had copper violations and OC San issued multiple enforcement actions as a results, including compliance requirement letters, compliance inspections, and compliance meetings. In turn, TTM Technologies submitted updated pretreatment system diagrams and operations and maintenance manual (O&M) and implemented multiple corrective actions including replacing control valves and level sensors, implementing high level alarms and pump controls, installing basket screens at the end of all pump discharge pipes, and providing additional training to employees.

As a result of continued copper violations in November 2021 and June 2022, TTM Technologies retrained their operators, fixed damaged lines, improved inspection logs requiring management sign off, redirecting the decant to the filter press for recirculation, and additional solids removal prior to final discharge.

July 1 – December 31, 2022

On July 7, 2022, TTM Technologies informed OC San that their internal sample showed a result of 5 mg/L for copper. They attributed this to the discharge of spent solution with low pH that stripped the scavenger system, thus preventing proper treatment prior to discharge and that the discharge valves that were typically locked, were opened by their maintenance team. Their operator also set the treatment system in manual mode, bypassing the system's automatic shutdown function to prevent the tank from overflowing. The NOV for the copper violation in June 2022 was issued on July 12, 2022. During the compliance inspection on July 20, 2022, OC San reviewed the decanting procedure for their batch treatment. TTM Technologies had installed bag filters downstream of the decant discharge to catch any remaining solids prior to discharging to the final tanks. They had also informed OC San that they intend to install a holding tank prior to the scavenger feed tank to conduct pH adjustment and has the ability to redirect any non-compliant wastewater to the emergency tank to be recirculated and retreated. OC San also observed that TTM Technologies had installed locks (only accessible to the wastewater team) on the valves used to discharge spent solutions. As of December 2022, TTM Technologies had completed the installation of a 3,000 gallon tank for additional equalization prior to their scavenger unit. TTM Technologies has also converted the hand-off-auto switches to a key operated switch to prevent unauthorized personnel from switching the system into manual mode and bypassing treatment. TTM Technologies had no further violations during this reporting period.

January 1 – June 30, 2023

TTM Technologies had no violations during this reporting period and TTM's permit will be revised to increase self-monitoring to monthly for copper. Therefore, no further enforcement 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.



### **TTM Technologies North America, LLC. (Croddy) (Permit No. 1-511366)**

TTM Technologies North America, LLC (Croddy) (TTM Technologies) is a large -scale printed circuit board manufacturer. TTM Technologies manufactures rigid multilayer printed circuit boards from copper clad and prepreg materials. TTM Technologies is a full service facility that specializes in quick-turn, prototype, and semi-production orders for commercial, computer electronics, industrial, medical, and telecommunication applications. The effluent discharge at TTM Technologies is generated by the various spent process solutions and the associated rinse stages produced at this location. (TTM Technologies operates two locations in Santa Ana operating in tandem, but discharging wastewater under separate Permits). 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.

#### **July 1 – December 31, 2022**

TTM Technologies had no violations during this reporting period.

#### **January 1 – June 30, 2023**

In February 2023, TTM Technologies exceeded the monthly average discharge limit for copper, for which a NOV was issued on May 3, 2023. TTM Technologies conducted an internal investigation and could not determine the cause of the elevated copper concentration. TTM Technologies noted all probes and monitors had been routinely calibrated and were working properly. TTM Technologies noted they would collect additional and voluntary samples in the future in the event of elevated sample concentrations.

TTM Technologies 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 TTM Technologies' discharge and compliance status on a quarterly basis.

### **United Pharma, LLC (Permit No. 1-531418)**

United Pharma is a custom manufacturer of nutritional soft-gel capsule and mixed formulation products. Wastewater is generated from equipment cleaning in a designated washroom, gelatin melting tanks vacuum lines, water used in the liquid ring pumps, dehumidifier in drying room, floor mop water, hand sinks and laundry room used to wash rags. Additional sources of wastewater include RO reject, boiler blowdowns and chiller blowdown. Pretreatment currently consists of a 3-stage clarifier with a sample point and a pH adjustment system. Wastewater is continuously recirculated from the sample point to the first stage, to help act as a mixer, to ensure compliant pH discharge, and to keep the pH probe in the pipe wet at all times. Once level the sample point reaches a setpoint, a float is triggered and a pump will be activated to discharge the wastewater into the sewer.

In January 2022, OC San observed that the current sample point of the final stage of the clarifier does not allow for a representative pH grab sample. In March 2022, OC San issued an NOV requiring United Pharma to provide a proposal for a representative sample point. United Pharma submitted their proposal to move the pH adjustment from the last stage of the clarifier to the third stage. However, the proposal does not address that the sample point is not representative since contents in the final stage of the clarifier continues to change until the float switch is activated. During a site visit in April 2022, OC San reviewed United Pharma's revised proposal which included taking grab samples only when the float was activated.

#### **July 1 – December 31, 2022**

On December 12, 2022, OC San issued a compliance requirement letter to inform United Pharma about recategorization of their facility to the Pharmaceutical Manufacturing category. The letter also required United Pharma to provide an evaluation of the flow rate of each dilution flow stream as well as the total effluent to the sample point to ensure proper categorical discharge limits can be applied. United Pharma was required to submit the evaluation by January 15, 2023. OC San will review United Pharma's proposal

on collecting grab samples during float activation in conjunction with their flow evaluations and will provide a response during the next reporting period.

#### January 1 – June 30, 2023

After several conversations with OC San on their approach to evaluate their flow streams, United Pharma had requested an extension to submit the evaluation as they would like to monitor and collect additional flow data. OC San extended the deadline to submit the evaluation to February 28, 2023. On March 21, 2023, United Pharma submitted the report on water usage from the study they conducted. OC San is currently reviewing the submitted report and will address United Pharma's recategorization and continue enforcement during the next reporting period.

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

#### **Van Law Food Products, Inc. (Permit No. 1-600810)**

Van Law Food Products, Inc. (Van Law) blends, packages, stores, and distributes various sauces, condiments, and beverage concentrates. Wastewater is generated by the steam cleaning of packaging equipment and washdown of loading and packaging areas, along with some boiler blowdown. Pretreatment consists of equalization, continuous automatic pH adjustment with caustic soda, polymer addition followed by solids removal by a dissolved air floatation system.

#### July 1 – December 31, 2022

On December 7 and 8, 2022, Van Law had pH violations for which an NOV was issued on December 29, 2022.

#### January 1 – June 30, 2023

On January 15, 2023, Van Law submitted a root cause analysis and a corrective action report for the violations that occurred in December, attributing the violation to their facility technician that failed to open the valve for their caustic dosing system after performing maintenance on the equipment. As part of their corrective action, Van Law has retrained their operators on the wastewater treatment process and the proper lock-out-tag-out procedure. On January 18, 2023, OC San conducted a compliance inspection to review the root cause of the violation and corrective actions implemented. During the inspection, Van Law indicated that there has been an increase in production and their wastewater system may be undersized for their current production. Van Law has indicated that they are working on a plan to upgrade their treatment system. Van Law was also unable to provide an explanation as to why their pH diversion valve failed to operate during the violation. OC San requested Van Law to provide confirmation that these valves are still functional and to provide corrective actions to ensure that these redundancies are operational to ensure long term compliance. On February 3, 2023, Van Law provided a root cause analysis on the failure of their diversion valve, attributing the failure to a closed air valve that prevented compressed air from actuating the diverter valve. As a corrective action, Van Law had removed the valve handle and had posted a sign to indicate that the air valves are required to remain open at all times. Additionally, their third-party vendor who is responsible for the pH control system, added testing of the diversion valve as part of their monthly preventative maintenance. Van Law also completed the installation of the pH alarm system by April 12, 2023.

Van Law 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 Van Law's discharge and compliance status on a quarterly basis.

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

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

sewer system. Vi-Cal's treatment system consists of a batch system including flocculation, coagulation, filtration, and pH adjustment.

#### July 1 – December 31, 2022

Vi-Cal was published as significantly noncompliant for reporting violations in the OC Register on October 21, 2022. On December 06, 2022, OC San issued a compliance requirement letter to request Vi-Cal to attend a compliance meeting to discuss their consecutive SNC status, missing reports, non-representative samples, and Vi-Cal's poor communication efforts.

#### January 1 – June 30, 2023

Vi-Cal failed to attend the compliance meeting that was scheduled on January 5, 2023. On March 30, 2023, OC San issued an order to cease and terminate discharge to Vi-Cal for failing to submit a permit renewal application by their permit expiration date and required Vi-Cal to attend a compliance meeting on April 13, 2023. During the compliance meeting on April 13, 2023, Vi-Cal attributed the cause of their late permit application to an oversight on Vi-Cal's end, where their consultant failed to complete and submit the application. Vi-Cal had also stated that they implemented a restructuring of their personnel such that there are multiple personnel responsible for their reporting to ensure that they do not miss any future deadlines. On April 25, 2023, OC San issued a compliance requirement letter that summarized the meeting discussions and required Vi-Cal to take appropriate measures to ensure reports are submitted by the deadline, and to provide safe and direct access to the sample point.

During a quarterly inspection, OC San observed that the pretreatment system does not allow the collection of representative grab samples for O&G min. as the contents of the batch tank is not homogenous during discharge. On February 1, 2023, OC San issued a compliance requirement letter, requiring Vi-Cal to submit a proposal by February 28, 2023, to ensure that the wastewater discharged is well mixed and homogenous so a representative sample can be collected. On March 15, 2023, Vi-Cal submitted a proposal to install a submersible pump to recirculate the contents of the batch tank prior to discharge. OC San accepted the proposal and required Vi-Cal to complete the installation of the accepted proposal by April 15, 2023 which they completed on April 17, 2023.

On March 22, 2023, Vi-Cal had a O&G min. violation, for which an NOV was issued on May 2, 2023. On May 31, 2023, OC San conducted a compliance inspection to review the cause of the March 2023 violation. Vi-Cal was not able to determine the root cause of the violation and speculated that a potential cause may be that other types of coolants that are received but segregated from operations that discharge to the treatment system, may have inadvertently been discharged to the treatment system. As a corrective action, Vi-Cal has re-trained their operators on proper management of their waste streams.

On June 15, 2023, OC San issued a notice to inform Vi-Cal for intentionally falsifying information on their self-monitoring report for May 2022. When reviewing the submitted report, the chain-of-custody submitted for the sample indicated that the sample collected was for stormwater instead of industrial wastewater. OC San has sent emails to request clarification on the submittal on July 18, August 5, August 19, and September 2, 2022. However, no responses have been provided by Vi-Cal. The notice required Vi-Cal to provide clarifications to the sample collected, analyzed and submitted to OC San by July 15, 2023.

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

#### **Waste Management Collections & Recycling, Inc. DBA Sunset Environmental (Permit No. 1-601581)**

Waste Management Collections & Recycling, Inc. DBA Sunset Environmental (Waste Management) is a transfer station and material recovery facility for municipal solid and green wastes. Wastewater is generated from water misting/spraying of trash and green wastes and potential liquid contents from the trash itself. The leachate and trash drippings flow through a grated trench to an underground three-stage clarifier prior to discharge to the sewer. Pretreatment system consists of sulfide treatment to reduce excess sulfides in the effluent.

#### July 1 – December 31, 2022

On September 20, 2022, Waste Management had a sulfide violation for which an NOV was issued on October 25, 2022. On November 14, 2022, OC San conducted a compliance inspection to investigate the root cause of the sulfide violation and to collect a resample. During the compliance inspection and in a corrective action report from Waste Management on November 17, 2022, Waste Management attributed the sulfide violation to a build-up of excess solids in the clarifier or a malfunction of the clarifier odor control drip system which controls sulfide levels in wastewater. OC San communicated the importance of regular cleaning and maintenance to the clarifier to prevent excess accumulation of solids. Corrective actions identified by Waste Management also included increasing the frequency of clarifier cleaning from quarterly to monthly and implementing daily visual inspections of the odor control drip system. Resample results showed compliant levels of sulfide in the discharged wastewater.

#### January 1 – June 30, 2023

Waste Management had no 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 Waste Management's discharge and compliance status on a quarterly basis.

#### **Weber Precision Graphics (Permit No. 1-011354)**

Weber Precision Graphics (Weber) produces printed decals, labels, stickers, and faceplates. Base materials of plastic or metal are silk-screened with UV pigment-based inks. Manufacturing processes include computer-generated screen manufacturing, ink application, curing, screen cleaning, art work, and shop cleaning. Wastewater is generated from screen cleaning and press cleaning operations, floor waste, and art work.

#### July 1 – December 31, 2022

On December 28, 2022, Weber had a nickel violation. OC San will issue an NOV and conduct a 30-day resample and compliance inspection, during the next reporting period.

#### January 1 – June 30, 2023

On January 10, 2023, OC San issued an NOV for the nickel exceedance which occurred in the previous reporting period. OC San conducted 30-day resampling and inspection activities on February 21, 2023, to which the results were compliant with nickel discharge limits. Weber noted that the batch treatment holding tank had not been thoroughly cleaned for several years which may have led to the nickel exceedance.

Weber 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 Weber's discharge and compliance status on a quarterly basis.

#### **Winonics (Brea) (Permit No. 1-031035)**

Winonics Brea (Winonics) is a printed circuit board manufacturer. Winonics manufactures multi-layer printed circuit boards using core materials of epoxy and polyimide laminate coated with copper foil of various thickness. Manufacturing processes include core material shearing, surface cleaning, photo resist application, brown oxide treatment, lamination with prepreg/resin sheets, electroless copper coating, tin pattern plate, etching, oxide scrubber, ENIG automated coating line, electroless nickel and gold or silver coating, and hot air solder leveling.

The pretreatment system at Winonics consists of batch treatment for spent process chemicals and drag-outs, and continuous heavy metals precipitation for rinse waters and some dilute chemistries, using standard pH/ORP controls with chemical feeds for caustic, coagulants, and polymer / floc additions. Batch treatment effluent is directed to the continuous system for final treatment before discharge to the sewer, and solids from batch treatment transferred to the solids thickening tank. Spent resist stripper solution is

processed through a separate batch treatment (pH adjust) then a dedicated filter press for solids dewatering before the filtrate is discharged to the sample point, along with developer and resist stripper rinses as these waste streams contain no heavy metals. Aqueous fume scrubber overflow is directed to the pretreatment system, while RO water treatment system reject is plumbed downstream of Winonics' sample point.

#### July 1 – December 31, 2022

During a routine inspection on September 27, 2022, OC San noted multiple compliance deficiencies including the outdoor pretreatment system area being uncovered and exposed to stormwater, a stormwater collection sump and trench drain in an adjacent truck bay plumbed to the pretreatment system, which actively discharges to the sewer, a wet process area tank and an associated spray rinse leaking into a process area floor containment pit, and leaking rinsewater was observed from a pipe connected to the electroless copper plating line. On December 5, 2022, OC San issued a compliance requirements letter summarizing the findings of the inspection and the requirements to institute corrective actions to maintain long-term compliance.

#### January 1 – June 30, 2023

Winonics had no violations during this reporting period.

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

#### **Winonics, Inc. (Permit No. 1-021735)**

Winonics, Inc (Winonics) is a large, full service printed circuit board facility. Industrial wastewater is generated by the processing of copper-clad laminates into printed circuit boards. Wet processes performed at the facility include photoresist application, copper plating, electroless copper plating, nickel/gold plating, tin plating, soldermask, acid and alkaline cleaning, scrubbing, developing, resist stripping, tin stripping, permanganate etching, cupric chloride etching, ammonia etching, Circubond (black oxide) and miscellaneous cleanup/mopwater. Winonics operates a continuous treatment system with pH adjustment, flocculation, clarification, and solids dewatering with a filter press. Winonics also operates a batch treatment system for acidic solutions and rinses. Resist stripper solutions, developer solution and all final rinses discharges directly to the sample point without treatment. Winonics also discharges aqueous fume scrubbing and R.O. reject to the sample point.

In October 2021, Winonics had a violation of their copper instantaneous limit. OC San conducted a compliance inspection in December 2021 to investigate the cause of this violation. During the inspection, OC San collected an informational sample from the discharge from the lamella clarifier, which showed an elevated level of copper. As a corrective action, Winonics increased the dosage of the coagulant and metal precipitant to increase the effectiveness of treatment. Additionally, Winonics increased the air pressure at the air knives on their cupric etchant line to decrease the amount of drag-out that discharges to lamella clarifier.

In March 2022, Winonics had another violation of the copper instantaneous limit. In April 2022, Winonics attributed the violation to insufficient dosing of the polymer and coagulant. As a corrective action, Winonics installed an additional polymer dosing pump, changed the ORP setpoint for the metal precipitant and increased cleaning frequency of the lamella. OC San conducted a compliance inspection in May 2022 to review the modifications and collected additional informational samples to determine the efficiency of the lamella. In May 2022, Winonics had another violation of the copper instantaneous limit.

#### July 1 – December 31, 2022

On August 22, 2022, OC San issued a compliance requirement letter, requiring Winonics to attend a compliance meeting to discuss the recent copper violations. During the compliance meeting on September 21, 2022, the potential sources of the violations were attributed to overloading the treatment system from the cupric etcher and inadequate settling of solids. Winonics had implemented a more rigorous cleaning schedule for the clarifier, and will consult with their vendor to perform an audit on their existing treatment system to ensure that the system is working effectively. During the quarterly inspection on October 18-19,

2022, Winonics informed OC San that they had implemented a flow control valve and a flow gauge upstream of the clarifier to control the loading to the clarifier. OC San also conducted a visual inspection of the clarifier and did not observe any solids floating at the top of the clarifier. On November 28, 2022, OC San issued a compliance requirement letter that summarizes the items discussed during the compliance meeting. OC San also required Winonics to implement maintenance logs, provide a summary of the findings of the audit, develop updated pretreatment system drawings, and develop an operation and maintenance manual by December 31, 2022. On December 15, 2022, Winonics submitted revised drawings, logs, operation and maintenance manual, and a summary of their audit. Per the findings of their audit, Winonics had adjusted the chemical dosing for polymer, coagulant, and sodium metabisulphite in their treatment operation, and reduced the flow rate to the clarifier. Recent sampling demonstrated compliance with discharge limits at the sample point and at the lamella clarifier.

#### January 1 – June 30, 2023

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

As of May 31, 2023, this permit is no longer active as Winonics now operates under a new Class 1 permit due to a change of ownership.

## Chapter 5. Pretreatment Program Staffing, Costs, and Field Equipment

### 5.1 Introduction

This chapter discusses the pretreatment program's staffing levels, program costs, payments to OC San by permittees, and equipment used by the program.

### 5.2 Staffing, Revenues, and Costs

#### 5.2.1 Staffing

The Resource Protection Division, a part of OC San's Environmental Services Department, includes all the pretreatment program staff. Dedicated pretreatment staff for FY 2022/23 consists of one manager, three supervisors, nine engineers, four environmental specialists, 10 field inspectors, four field technicians, and six administrative support personnel for a total of 37 staff members.

#### 5.2.2 Revenues

During FY 2022/23, a total of \$22,046,480.64 in revenue payments were made to OC San by Class I, Class II, Wastehauler, Special Purpose Discharge, and FOG FSE permittees. The following amounts were collected for the discharge of wastewater, biochemical oxygen demand, and suspended solid pollutants. Operation and maintenance (O&M) fees totaled \$14,839,418.06, Supplemental Capacity Facilities Capacity Charge (SCFCC) fees totaled \$5,221,386.37, and wastehauler user fees totaled \$1,249,144.69. Permit fees in the amount of \$669,205.73 were collected, and over \$67,325.79 in noncompliance fees and penalties issued. Due to a change in OC San's Financial Management Division's accounting practices, the O&M and SCFCC fees represent the prior fiscal year, FY 2021/22 and an estimate of FY 2022/23.

The revenue collected offsets a portion of OC San's treatment costs and the \$7,641,063 needed to administer the pretreatment program, including labor, supplies, equipment, and other overhead. These costs are associated with issuing permits, sampling, inspections, and laboratory analyses.

#### 5.2.3 Program Costs

Overall pretreatment program implementation costs (including overtime) during the fiscal year increased 43.2% over the preceding year and shows a 3.2% increase from the program costs of five years ago. The cost per labor hour over the past five years has increased 10.7%, which is an average of 2.1% per year increase. A comparison of pretreatment program costs for the past five years is shown in Table 5.1.

<b>FY</b>	<b>Total Cost</b>	<b>Labor Hours</b>	<b>Cost per Labor Hour</b>
2018-19	\$7,406,407	72,646	\$101.95
2019-20	\$7,206,630	71,355	\$101.00
2020-21	\$6,630,445	68,713	\$96.49
2021-22	\$5,334,568	70,082	\$76.12
2022-23	\$7,641,063	67,720	\$112.83

### 5.3 Field Equipment

#### 5.3.1 Equipment Inventory

An inventory of major equipment used by OC San inspection staff for the Resource Protection Division is shown in Table 5.2. There are 13 field staff each utilizing trucks and modern sampling equipment to maintain a high degree of visibility in the industrial community.

<b>Table 5.2 Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division	
<b>Description</b>	<b>Quantity</b>
Vehicles	13
Equipment	
Cellular phones	13
Laptop computers	13
Composite samplers – general use	53
Composite samplers – special purpose	16
Portable sample pumps	3
pH meters – portable	20
Gas meters	26



## **Chapter 6. Pretreatment Program Status**

### **6.1 Introduction**

OC San administers several different program elements designed to meet the goal of controlling discharges from industrial and non-industrial sources. These have a direct influence on OC San's ability to meet ocean discharge, biosolids reuse, and water reclamation requirements. This chapter outlines those program elements designed to enforce and enhance the federally-approved Pretreatment Program including, industrial discharger public participation, wastehauler monitoring, industrial inspection and sampling, quality assurance/quality control, Total Toxic Organic (TTO) waivers, Special Purpose Discharge Permits, self-monitoring, and industrial operations and maintenance improvement.

### **6.2 Public Participation**

A provision of 40 CFR 403.8 is to comply with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards. These procedures shall include provision for at least annual public notification in the newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by OC San, of industrial users which, at any time during the previous 12 months, were in significant noncompliance with applicable pretreatment requirements. This public notice is shown in Appendix E.

### **6.3 Wastehauler Program**

OC San operates a dedicated discharge station at Reclamation Plant No. 1 for the disposal of septage, chemical toilets, brine, cesspool, and non-industrial food service establishment (FSE) grease interceptor wastes collected by independent wastehaulers. The discharges are transferred via a major interplant sewer to Treatment Plant No. 2 for treatment. OC San Treatment Plant No. 2 has a back-up discharge station used during Plant No. 1 service interruptions. The following sections provide the status of wastehauler permitting, discharges and monitoring conducted during FY 2022/23. Values provided in the tables are derived primarily from manifests provided by the wastehauler companies.

#### **6.3.1 Wastehauler Permitting**

A liquid wastehauler must first register with the Orange County Health Care Agency (OCHCA) and have all vehicles that intend to discharge at OC San inspected by OC San staff to obtain a wastehauler permit from OC San. Numerical decals issued by both OCHCA and OC San are affixed to all permitted vehicles. These decals aid in the identification of authorized dischargers. Permits include but is not limited to rules for use of the wastehauler station and enforcement for violations. Wastehaulers must conduct their business using methods to reduce or eliminate odors. During FY 2022/23, 45 wastehauler companies were under permit with OC San, with a total of 152 vehicles.

#### **6.3.2 Wastehauler Discharges**

During the past fiscal year 11.6 million gallons (MG) of waste was discharged by permitted wastehaulers at the OC San Wastehauler Station. The number of loads received increased 2.7% from FY 2021/22. Wastehauler discharge data for the last five years is summarized in Table 6.1.

<b>Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2018/19-2022/23</b> Orange County Sanitation District, Resource Protection Division		
<b>FY</b>	<b>Loads Delivered</b>	<b>Volume Waste Received (MG)</b>
2018-19	8,127	13.2
2019-20	8,467	12.6
2020-21	6,675	10.0
2021-22	7,940	11.6
2022-23	8,157	11.6

Wastehauler loads are classified into five types of waste: brine, cesspool, chemical toilets, non-industrial food service establishment (FSE) grease interceptor waste (i.e., restaurant grease trap waste), and septic tanks. The total volumes and number of loads for each type of waste are summarized in Table 6.2.

<b>Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division			
<b>Load Type</b>	<b>Loads Delivered</b>	<b>Waste Received (MG)</b>	<b>% Waste Received</b>
Brine	0	0	0%
Cesspool	32	49,578	0.043%
Chemical toilet	4856	6,706,746.86	57.82%
FSE grease	2681	4,065,556.10	35.05%
Septic tank	588	776,810.00	6.70%
<b>All Types Total</b>	<b>8,157</b>	<b>11,598,690.96</b>	<b>100%</b>

During the past fiscal year 4.06 million gallons of FSE grease was discharged by permitted wastehaulers at OC San's Wastehauler Station. This represents a 7.4% increase from the volume of grease discharged during FY 2021/22. The five-year trend for grease is presented in Table 6.3.

<b>Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San's Disposal Station, FY 2018/19-2022/23</b> Orange County Sanitation District, Resource Protection Division		
<b>FY</b>	<b>Loads Delivered</b>	<b>Volume (MG)</b>
2018-19	2,939	5.40
2019-20	2,672	4.65
2020-21	1,924	3.08
2021-22	2,346	3.78
2022-23	2,681	4.06

### 6.3.3 Wastehauler Monitoring

Random sampling of wastehauler loads is conducted to verify compliance with OC San discharge limits. During FY 2022/23, the contents of 1,097 discrete wastehauler loads (13.4% of all loads received) were sampled and 6,582 metal analyses were performed. The results of the sampling included 35 metal violations in 1,097 loads that originated from either domestic sources or grease hauling. This represents a 3.19% violation rate of the total samples taken and analyzed. The violations included 20 copper, and 15

zinc concentration exceedances. Some of the actions taken by OC San as a response to these violations included generator verifications and inspections, investigations, NOV letters, and compliance meetings.

#### **6.4 Inspection and Sampling**

OC San schedules sampling and inspection of each Class I industry on a quarterly basis, and samples select Class II industries periodically. Permittees are sampled for metals, cyanide, organics, pH, oil and grease, biochemical oxygen demand (BOD), and suspended solids (SS). Inspections are conducted before and/or after each 24-hour composite sampling event, at the time of collecting a grab sample, and to determine compliance with other provisions of the Ordinance.

#### **6.5 Quality Assurance and Quality Control (QA/QC) Activities**

##### **6.5.1 QA/QC Program Tasks**

The objective of the QA/QC program is to ensure that all field sampling and monitoring is accurate and performed in accordance with Resource Protection Division's adopted policies and procedures. The QA/QC program includes the following components.

Equipment Blank – Composite samples of deionized water are collected monthly to evaluate the cleaning procedures and storage of automatic sampling equipment.

Archive Sample Check – Archived heavy metal samples are analyzed monthly, several months after collection, to evaluate the effects of sample storage conditions and whether those conditions impose analyte degradation or contamination.

Sample Collection Check – Duplicate composite samples are collected quarterly to evaluate the precision of the sample collection and preservation methods.

Trip-Blank Evaluation – Samples made up of reagent water are collected to measure the potential contamination of US EPA Method 624 samples during transport and storage.

Sample Collection and Inspection Audit – Periodic reviews are conducted to assure that inspectors conform to existing guidelines for inspection and sample collection, and that existing procedures continue to ensure representative data. Document reviews are completed to assess overall inspector performance.

During FY 2022/23, 72 composite samples were analyzed for equipment blank verification, 48 archived samples were analyzed for comparison against previous analytical results, 100 composite samples were analyzed from industrial discharges to audit collection methods, and 12 trip blank samples were analyzed to verify the effectiveness of the transportation and storage methods of volatile organic compound samples. The test results for QA/QC samples collected are detailed in Appendix I. The overall results show that the procedures and their implementation for the collection of field samples are adequate to assure sample quality and consistency.

##### Calculation Methods

Equipment blank sampling is performed to find any concentration above the reporting limit (RL). Any detectable amount is considered an indicator of possible contamination in the deionized water supply, detergent, containers, storage, or other sources. The number of times a metal is detected above the RL is tracked.

Methods for calculating deviations were refined beginning with data generated during 2005 to be more consistent with accepted laboratory standards for quality control. The prior use of Pretreatment Standards for Existing Sources (PSES) discharge limits to calculate percent deviations for duplicate samples has been

replaced with the relative percent difference (RPD) formula found in Standard Methods for the Examination of Water and Wastewater (Standard Methods)<sup>1</sup>.

Precision among duplicate samples is important for the archive samples and sample collection checks. The following metrics were determined based on the nature of the samples normally collected and the variables with matrix effects anticipated. The precision of low-level duplicates, with concentrations less than 20 times the RL is  $\pm 25\%$  RPD. The precision of high-level duplicates, with concentrations greater than 20 times the RL is  $\pm 20\%$  RPD. These guidelines are used to present and calculate the archive sample data in the tables below. If the average of the two duplicate samples is greater than 20 times the RL, then the more restrictive limit of 20% is used to evaluate precision. Additionally, per Standard Methods, values where the average is below five (5) times the RL are not used for the RPD calculation.

A study conducted in 2009, including a review of relevant literature and OC San data, confirmed that silver is relatively unstable under standard preservation and storage conditions, and cannot be used to evaluate precision and accuracy with the other metals listed below in archive samples. Consequently, silver has been removed from the list of metals used to evaluate precision and accuracy.

The current RLs used by OC San’s laboratory during FY 2022/23 are listed in Table 6.4 below. These reporting limits are used in calculations in tables where RLs appear.

### 6.5.2 QA/QC Sampling Results

#### Evaluation of Equipment Blank Sampling Results

To check for contamination of sampler and field equipment, two composite samples are collected each month using clean, randomly chosen automatic samplers. The two samplers are set at the Source Control Inspection group’s technician room in a controlled setting to run a composite sampling program to collect samples from a deionized water supply. The equipment blank samples are composited and preserved in the same manner as compliance samples collected at permitted facilities. Each sampler’s composite is split into three equal volumes, preserved, then submitted to and analyzed individually by OC San’s laboratory for heavy metal constituents.

The results of this study are summarized in Table 6.4. The statistics presented below show that 100% of the analyses (432 of 432 analyses) are at or below the heavy metal constituents RL.

<b>Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division					
Constituent	RL (mg/L)	Analyses at or Below RL		Analyses Above RL	Total Avg. Deviation
		No. of Analyses	Percentage	No. of Analyses	
Cadmium	0.02	432	100	0	0
Chromium	0.02	432	100	0	0
Copper	0.02	432	100	0	0
Nickel	0.02	432	100	0	0
Lead	0.02	432	100	0	0
Zinc	0.10	432	100	0	0
<b>Summaries</b>					

<sup>1</sup> Standard Methods for the Examination of Water and Wastewater 23<sup>rd</sup> Edition. Part 1020-B, Section 12, Subsection f, entitled “Duplicate sample” (pg. 1-11)

### Evaluation of Archived Samples

Archived samples are submitted to OC San's laboratory to evaluate the effects of sample splitting and storage techniques. The results of the archive sample analysis are compared with the original sample results and the RPD is calculated for each metal. Results at or below the RL are calculated as equal to the RL.

Statistics on the archived samples and RPD are summarized in Table 6.5. Of the 288 comparisons performed on 96 samples (48 archived samples and 48 original samples), 99.8% of the results were within the acceptable RPD.

<b>Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division				
Constituent	Comparisons within acceptable RPD	Comparisons outside acceptable RPD	Percent within acceptable RPD	Average RPD (%)
Cadmium	96	0	100	2
Chromium	96	0	100	6
Copper	95	1	99	9
Nickel	96	0	100	3
Lead	96	0	100	0
Zinc	96	0	100	5
<b>Summaries</b>	<b>575</b>	<b>1</b>	<b>99.8</b>	<b>4</b>

### Sample Collection Checks

Two composite samplers collected 20 samples each quarter to verify the precision of the sample collection methods. In this study, two automatic samplers are installed adjacent to each other at a single industrial sample point to collect one composite sample from each sampler. Each composite sample is split into ten duplicate portions. Five duplicates from each sampler are analyzed by OC San's laboratory for heavy metals (HM) and five are analyzed for total suspended solids (TSS).

The results for each constituent are evaluated by calculating the RPD for each group of metals. Values that exceed the accepted deviations for metals and TSS are investigated, and where causes are identified, corrective actions are taken. This comparison is used to confirm that the sample location is appropriate, that the samplers are maintained and are functioning properly, and that the sample-splitting techniques are effective.

The statistics on the collection check samples and the sampler average deviations are summarized in Table 6.6. The comparisons show acceptable agreement both among the samples within the sampler and between the samplers at the site.

<b>Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2022/23</b> Orange County Sanitation District, Resource Protection Division								
Qtr.	Location	Average Deviations						
		Cadmium	Chromium	Copper	Nickel	Lead	Zinc	TSS
1	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	1.0
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	1.1
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	140.1
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	140.2
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	0.1
3	Sampler A	0.00	0.00	3.44	0.00	0.00	0.00	19.8
	Sampler B	0.00	0.00	1.92	0.00	0.00	0.00	19.4
	Site RPD (%)	0.00	0.00	1.90	0.00	0.00	0.00	2.0
4	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	2.9
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	2.2
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Avg</b>	<b>Site RPD</b>	<b>0.00</b>	<b>0.00</b>	<b>0.48</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.53</b>
All results are in units of sampler average deviation. TSS = total suspended solid								

The variation between samples at the same site were within appropriate ranges, indicating acceptable sample splitting. Results of all four quarterly Collection Check comparisons were within the acceptable Site RPD which indicates acceptable sample splitting techniques are used. Collection check procedures are currently being evaluated and staff will be notified of any changes if necessary.

#### **Trip Blank Evaluation for US EPA Method 624 Analysis**

Inspectors perform this study monthly. Containers prepared with reagent water are obtained from OC San's laboratory and are carried by inspectors with other samples during their workday. The containers are returned to the lab and analyzed for volatile organics. Twelve trip blanks were analyzed for volatile organics using US EPA Method 624. All twelve US EPA Method 624 trip blanks were below reporting limits.

#### **Sample Collection and Inspection Audit**

During FY 2022/23, the source control supervisor audited the sample collection and inspection procedures of individual inspectors. The audit of each inspector was accomplished by document review during performance evaluations. Opportunities for improvement were discussed with individual inspectors during their mid-year and annual performance reviews.

#### **6.5.3 QA/QC Conclusions**

The following findings support the general conclusion that the sampling procedures are being followed and that the samples are representative and free of contamination.

- Results of the equipment blank evaluation demonstrate that 100% of the equipment blank samples have concentrations at or below the heavy metal reporting limits.
- Results of the archive sample evaluation demonstrate that 99.8% of the archive samples were within the acceptable percent deviation range.

- The sample collection check results show good agreement for heavy metals among split samples for each sampler as well as between samplers at the same site. The sample locations and sample-splitting methods are adequate to provide representative samples for heavy metals.

All twelve US EPA Method 624 trip blanks were below reporting limits. Trip blanks were analyzed for volatile organics using US EPA Method 624.

## 6.6 Total Toxic Organics Waiver Program

Permittees subject to federal categorical standards were first notified of OC San's Total Toxic Organics (TTO) waiver program requirements on July 27, 1987. The current TTO waiver program is summarized below.

- Categorical permittees who are required to conduct self-monitoring for TTOs must collect composite samples at least semiannually. In accordance with OC San's Ordinance, the composite sample is obtained by analyzing the grab samples and compositing the results mathematically.
- Permittees that have not shown detectable levels of TTOs based on their wastewater discharge data for at least one year are eligible to waive the self-monitoring requirement if they certify that TTOs are not used or present in the industrial wastewater discharge at their facility. The wastewater discharge data used in evaluating eligibility for this waiver includes data for samples obtained by OC San during routine monitoring and the self-monitoring results obtained by the permittee. The evaluation of wastewater discharge to determine the permittees that are eligible for this waiver is conducted in December and June of each year. See Table 6.7 for those permittees that have successfully applied for a waiver. To be eligible for a waiver the permittee must satisfy all of the following criteria:
  - Permittee must demonstrate sampling results with TTO concentrations less than or equal to 0.05 mg/L for the monitoring period being considered.
  - Permit must have an initial permit issue date that is prior to the start of the baseline monitoring period being considered.
  - Submission of a Toxic Organic Management Plan (TOMP) that is accepted by OC San.
- Subsequently, permittees who have a TTO self-monitoring waiver, renew their Certification of Non-Use of TTOs semiannually during the application period, otherwise the waiver for the upcoming period is not approved. Issuance of a waiver does not constitute elimination of the self-monitoring requirement from the permit but provides a temporary discontinuance or suspension of the requirement as approved by OC San.
- The self-monitoring requirement waiver for any permittee is cancelled if sampling results from the permittee's self-monitoring or OC San's sampling demonstrate TTO concentrations above the 0.05 mg/L threshold. For these cases, the requirement to conduct self-monitoring at least twice per year is immediately reinstated.
- Newly permitted categorical users required to self-monitor will not be allowed to waive the self-monitoring requirement until meeting TTO reporting and waiver requirements for at least one year.

<b>Table 6.7 Permittees with TTO Waivers July 1, 2022 – June 30, 2023</b>			
Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-531422	A & G Electropolish	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021088	A & R Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011138	Accurate Circuit Engineering	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011115	Active Plating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Dec 31, 2022

<b>Table 6.7 Permitees with TTO Waivers July 1, 2022 – June 30, 2023</b> Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-021389	Advance-Tech Plating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-531404	Air Industries Company, A PCC Company (Knott)	Metal Finishing PSNS, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2022 - Jun 30, 2023
1-031110	All Metals Processing of Orange County, LLC	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011073	Allied Electronics Services, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011036	Alloy Tech Electropolishing, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521798	Andres Technical Plating	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600295	AnoChem Coatings	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511389	Anodyne, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011155	Anomil Ent. Dba Danco Metal Surfacing	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600689	APCT Anaheim	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600503	APCT Orange County	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-021192	ARO Service	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-071037	Aviation Equipment Processing	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-031094	Basic Electronics, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521824	Beckman Coulter, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511370	Beo-Mag Plating	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021213	Black Oxide Industries, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-111018	Boeing Company (Graham)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600316	Brasstech, Inc	Metal Finishing PSNS	Jul 01, 2022 - Dec 31, 2022
1-021226	Bristol Industries	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2022 - Jun 30, 2023
1-021062	Cadillac Plating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-111089	Cal-Aurum Industries, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511076	CD Video, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021189	Central Powder Coating	Metal Finishing PSNS	Jul 01, 2022 - Dec 31, 2022
1-521821	Circuit Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-111129	Coast to Coast Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600708	Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021290	Continuous Coating Corporation	Coil Coating PSNS, Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600920	CP-Carrillo, Inc. (Armstrong)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-021289	Crest Coating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021297	Custom Enamellers, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521761	Data Solder, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023



<b>Table 6.7 Permitees with TTO Waivers July 1, 2022 – June 30, 2023</b> Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-531405	DRS Network & Imaging Systems, LLC	Electrical And Electronic Components PSNS	Jan 01, 2023 - Jun 30, 2023
1-601023	Dunham Metal Plating Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021325	Dunham Metal Processing	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011064	EFT Fast Quality Service, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021158	Electro Metal Finishing Corporation	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511376	Electrode Technologies, Inc. dba Reid Metal Finishing	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-071162	Electrolurgy, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021336	Electron Plating III, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021337	Electronic Precision Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600457	Embee Processing (Plate)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-601356	Excello Circuits, Inc. (Hunter)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-021121	Fineline Circuits & Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021286	Harbor Truck Bodies, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521790	Hi Tech Solder	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021185	Hightower Plating & Manufacturing Co.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021081	Howmet Global Fastening Systems Inc.	Aluminum Forming PSES, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2022 - Jun 30, 2023
1-021041	Ideal Anodizing, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521756	Ikon Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511407	JD Processing, Inc. (East)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021171	Kenlen Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021428	Kryler Corporation	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600338	Lightning Diversion Systems LLC	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511361	LM Chrome Corporation	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-031049	Logi Graphics, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-531391	Magnetic Metals Corporation	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521811	Murrietta Circuits	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-571292	Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	Electrical And Electronic Components PSNS	Jul 01, 2022 - Jun 30, 2023
1-600981	Omni Metal Finishing, Inc. (Building 4)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021070	Pacific Image Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521805	Performance Powder, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023

<b>Table 6.7 Permitees with TTO Waivers July 1, 2022 – June 30, 2023</b> Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-011262	Pioneer Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521852	Platinum Surface Coating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600167	Powdercoat Services, LLC (Bldg E / Plant 1)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600168	Powdercoat Services, LLC (Bldg J / Plant 3)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600355	PowderCoat Services, LLC. Plant 5	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011265	Precious Metals Plating Co., Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521809	Precision Anodizing & Plating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-011008	Precision Circuits West, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600337	Q-Flex Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021187	Rigiflex Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-061008	Sanmina Corporation (Airway)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-061009	Sanmina Corporation (Redhill)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021016	Santana Services	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-031311	Scientific Spray Finishes, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600297	Shur-Lok Company	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-031341	Soldermask, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-601444	South Coast Circuits, Inc. (Bldg 3500 Ste A)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-601446	South Coast Circuits, Inc. (Bldg 3506 Ste A)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-601445	South Coast Circuits, Inc. (Bldg 3512 Ste A)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-601447	South Coast Circuits, Inc. (Bldg 3524 Ste A)	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-511381	SPS Technologies LLC, DBA Cherry Aerospace	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2022 - Jun 30, 2023
1-021672	Stainless Micro-Polish, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-531425	Star Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021664	Statek Corporation (Main)	Electrical And Electronic Components PSES, Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521777	Statek Corporation (Orange Grove)	Electrical And Electronic Components PSNS	Jul 01, 2022 - Jun 30, 2023
1-600012	Summit Interconnect, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-600060	Summit Interconnect, Inc., Orange Division	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021090	Superior Connector Plating, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023

<b>Table 6.7 Permitees with TTO Waivers July 1, 2022 – June 30, 2023</b> Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-031012	Tayco Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021282	Thermal-Vac Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-531415	Timken Bearing Inspection, Inc.	Metal Finishing PSNS	Jan 01, 2023 - Jun 30, 2023
1-111132	Tiodize Company, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021202	Transline Technology, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521859	TTM Technologies North America, LLC. (Coronado)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511366	TTM Technologies North America, LLC. (Croddy)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-511359	TTM Technologies North America, LLC. (Harbor)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-521836	Universal Molding Co.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-031035	Winonics (Brea)	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023
1-021735	Winonics, Inc.	Metal Finishing PSNS	Jul 01, 2022 - Jun 30, 2023

## 6.7 Special Purpose Discharge Permit Program

A special purpose discharge permit (SPDP) is issued by OC San for water and wastewater discharges to the sewerage system when no alternative method of disposal is reasonably available or to mitigate an environmental impact or threat.

Wastewater discharges may include: 1) temporary facilities and projects such as groundwater remediation and construction dewatering, 2) short-term or one-time water and wastewater discharges, 3) surface runoff from areas associated with an industrial or commercial facility.

### 6.7.1 SPDP Metrics and Trends

During FY 2022/23, 6 new SPDPs were issued, of which one expired; of the active SPDPs, six existing SPDPs were voided before expiration at the request of the permittees, and one SPDP was not renewed by the permittee upon expiration. During the fiscal year, there were 50 active SPDPs, a decrease from the previous fiscal year, but with only 40 remaining active by the end of the fiscal year. Active SPDPs are renewed every two years.

The majority of the new SPDPs issued during FY 2022/23 were for short-term construction dewatering activities (i.e., typically less than a year). Formerly, the most common special purpose permitted facilities were gasoline service stations that required remediation of contaminated groundwater. Other discharges affected include mobile cleaners, water features (e.g., pools), water-well purging disinfection, subsurface parking structure dewatering, etc.

OC San staff continues to work with outside agencies such as SARWQCB, OCHCA, and the cities within Orange County to both coordinate and offer guidance on the SPDP issuance process and OC San's Ordinance.

### 6.7.2 SPDP Program Enforcement

For FY 2021/22, the Orange County Flood Control District (OCFCD) failed to perform an effluent meter calibration and submit the report to OC San in accordance with permit requirements. On March 10, 2021, OC San issued a compliance requirement letter requiring OCFCD perform an effluent meter calibration and submit an effluent flow meter calibration report. At this time, OCFCD has failed to propose an acceptable method to perform the effluent meter calibration and OC San will continue enforcement during the next reporting period.

### **6.7.3 SPDP Regulatory Program**

OC San staff minimizes SPDP impacts to OC San Reclamation Plant No. 1 and Treatment Plant No. 2 by diverting noncompatible discharges from Reclamation Plant No. 1 to Treatment Plant No. 2, coordinating more closely with Operations, Engineering and Safety on significant one-time discharges, requiring pretreatment for projects which may encounter known contaminated underground plumes, requiring best management practices for small nuisance dischargers, and requiring significant construction dewatering dischargers to stop discharging during a rain event.

### **6.8 Self-Monitoring Program**

OC San operates an extensive self-monitoring program, which is an integral part of the Resource Protection Division's monitoring and enforcement programs. OC San's self-monitoring program exceeds the minimum requirements of 40 CFR 403. To obtain a broad perspective of a permittee's discharge quality and adequately determine their compliance status, OC San takes a proactive approach to self-monitoring (per US EPA recommendation) by requiring frequent sampling in most cases. OC San determined that sampling at a higher than the recommended frequency for constituents that have a reasonable potential to be present in the wastewater, is an effective method to generate sufficient data to make a fair determination of a permittee's compliance status, and balance the need for data against the related costs incurred by permittees. In addition, these sampling frequencies preclude permittees from being unduly classified as dischargers in SNC for isolated process upsets.

OC San's self-monitoring program is largely automated with self-monitoring results submitted on OC San's standardized self-monitoring report (SMR) forms. These forms are computer generated with unique SMR numbers that allow tracking and automatic generation of reminders, late and incomplete notices, violation notices with resample forms, and SNC notices. This tracking system has enabled OC San to ensure that permittees comply with self-monitoring requirements.

### **6.9 Industrial Operations and Maintenance Improvement Program**

To remain a vital part of the community, help businesses and industries in OC San's service area maintain compliance, and to enable OC San to attain its environmental goals, OC San established an Industrial Operations and Maintenance Improvement Program. The program serves as both a resource for industry and a forum for discussing methods to carry out environmental requirements. The program consists of outreach and education, which includes publications addressing pretreatment program elements, such as permitting, compliance and pollution prevention, OC San staff presence at educational events and fairs, and OC San-sponsored training opportunities.

#### **Industrial Operations and Maintenance Improvement Program**

The ongoing trend in industrial permittee discharge violations have shown that most cases are due to inadequate operations and maintenance of industry's pretreatment systems as well as industrial operator error. This was recognized when US EPA audit findings of 1998 recommended that OC San develop and implement an industrial operations and improvement program. In 1999/2000, OC San developed a plan that included outreach and operator training, and enforcement of requirements for operator and operations and maintenance practices which is still in effect today.

In 2019, OC San conducted a comprehensive training course for industrial wastewater treatment (pretreatment) operators currently employed by facilities holding a Class I wastewater discharge permit. The course was conducted by an engineering services company (selected via bid process for a five-year contract in 2019). OC San provided this training, free of charge, to assist permittees to obtain and retain a qualified pretreatment operator and to reduce or eliminate noncompliance due to operation and maintenance and/or operator problems. The training course consisted of five 4.5-hour classes and a follow-up wastewater audit at the operator facility to ensure proper implementation of operation and maintenance practices. Those that attended the classes, passed the exam and quizzes, and successfully fulfilled the audit requirements, received certificates of completion. The course has been on hold due to the pandemic.

## 6.10 Annual Technical Review of Local Limits

OC San develops local limits in accordance with 40 CFR 403.5(c)(1) to ensure protection of its workers and treatment facilities, to prevent Pass Through and Interference, and to enable reclamation opportunities. OC San's existing local limits remain unchanged from the 2015 Technical Evaluation of Local Limits (TELL). However, OC San periodically reviews and revises its local limits to respond to changes in treatment plant infrastructure and operations, regulations, wastewater characteristics, or industrial user (IU) discharge. While TELL is a comprehensive assessment to develop local limits using three to five years' worth of historical data, a technical review of local limits (TRLL) focuses on verifying whether the existing local limits are protective of the OC San's POTW, its workers, reclamation opportunities, and the environment using recent data. OC San's NPDES permit requires validation of existing local limits annually ahead of its next TELL. This section reports findings from the TRLL.

For this reporting period OC San compared actual FY 2021/22 influent loadings for individual pollutants of concern to maximum allowable headworks loadings (MAHLs) and maximum allowable industrial loadings (MAILs) calculated during the 2015 TELL. The TRLL evaluated the ratio of FY 2021/22 MAHL to FY 2014/15 Universal MAHL and FY 2021/22 MAIL to FY 2014/15 MAIL, respectively. As presented in Table 6.8, this ratio represents the percentage change of loading received at OC San.

Pollutant of Concern	FY 2021/22 Max Influent Loading	FY 2021/22 Max Industrial Loading
	FY 2014/15 Universal MAHLs (%)	FY 2014/15 MAILs (%)
1,4-Dioxane	18.05	3.13
5-day Carbonaceous Biochemical Oxygen Demand (CBOD <sub>5</sub> )	99.75	37.18
Ammonia	31.11	5.95
Arsenic	33.93	5.22
Cadmium	7.82	1.08
Chromium (Total)	0.38	0.05
Copper	35.35	6.27
Cyanide (Total)	16.05	2.30
Lead	3.76	0.52
Mercury	6.73	0.93
Molybdenum	18.78	2.74
Nickel	8.25	1.16
Pesticides	*	*
Oil and Grease of Mineral or Petroleum Origin	*	*
PCBs	*	*
Selenium	34.51	4.72
Silver	0.05	0.01
Sulfide (Dissolved)	*	*
Sulfide (Total)	*	*
Zinc	30.46	5.31

\* Per OC San's 2015 TELL technical memoranda, MAHL and MAIL are unnecessary for the regulatory and inhibitory limitations that apply to plant influents at the headworks or in the sewer collection systems. Best professional judgement limits are used instead.

As recommended by EPA's *Local Limits Development Guidance*, OC San employs a ratio threshold of 60% (80% for CBOD<sub>5</sub>) to consider revising its local limits. When a constituent loading ratio exceeds a threshold, OC San considers one or a combination of the following actions: (1) establish or revise a pollutant local limit, (2) investigate the cause of elevated loading, (3) increase IU monitoring and (4) consider undertaking pollution prevention measures.

The FY 2021/22 TRLL indicates that only CBOD<sub>5</sub> exceeds the action triggering threshold. CBOD<sub>5</sub> is a conventional pollutant whose allowable loadings are more dependent on OC San's treatment plant capacity than loading from industrial users; CBOD<sub>5</sub> does not represent a risk of Pass Through to OC San because OC San continues to maintain sufficient treatment capacity to reliably and properly treat CBOD<sub>5</sub> to consistently meet its NPDES discharge limits. Since the renewal of the OC San's NPDES permit in 2021, OC San has consistently met the CBOD<sub>5</sub> discharge requirements and there have not been any triggers indicating that OC San has exceeded the 85% of the design criteria for three months in a row. OC San's 2017 Facilities Master Plan (Master Plan) established wastewater flow and loading projections on which future demands are based. By comparing the influent BOD loading from FY 2021-2022 to the projected BOD influent mass loading for year 2022 (as outlined in the Master Plan), it becomes evident that the actual BOD influent loading for FY 2021-2022 is about 82.3 percent of the projected value. Furthermore, the ratio of the influent BOD loading from FY 2021-2022 to the influent BOD loading design criterion of onsite unit operations which remove BOD, it stands at approximately 53.7 percent. These two ratios indicate that OC San possesses sufficient capacity to remove BOD and meet the NPDES permit limits. For all other pollutants of concern, the local limits seem to be adequately protective of the OC San's POTW, its workers, reclamation opportunities, and the environment.

Pursuant to 40 CFR 122.44(j)(2)(ii), federal regulations require a written technical evaluation of the existing local limits following each permit issuance or re-issuance. In accordance with OC San's NPDES permit (issued August 2021) and now that the GWRS Final Expansion is complete, OC San has commenced its next TELL project which will provide contemporary technical support for OC San's Local Limits.

#### **6.11 Significant Changes in Operating the Pretreatment Program**

There were no significant changes to the OC San Pretreatment Program during FY 2022/23.

## **Chapter 7. Interaction with Other Agencies**

### **7.1 Introduction**

OC San has entered into agreements and has developed memoranda of understanding (MOUs) with Los Angeles County Sanitation District (LACSD) Nos. 18 and 19, Irvine Ranch Water District (IRWD), and the Santa Ana Watershed Project Authority (SAWPA) for accepting certain wastewater flows and implementing source control discharge, inspection, and enforcement requirements. Therefore, this chapter is divided into three sections: Section 7.2 presents information on LACSD for FY 2022/23, Section 7.3 presents information on IRWD for FY 2022/23, and Section 7.4 presents information on SAWPA for FY 2022/23.

### **7.2 Los Angeles County Sanitation District Nos. 18 and 19 Flow Accommodation Agreement**

In 1960, LACSD and County Sanitation District No. 3 of Orange County<sup>2</sup> entered into a flow accommodation agreement by which each district agreed to receive wastewater from the other district, where the wastewater originated in one district's service area and discharged into the other district's sewerage system. The geographic areas subject to the agreement are located along the Los Angeles County-Orange County boundary and are characterized by the fact that they are physically isolated from the sewer system of their respective district's jurisdiction by Coyote Creek. The districts entered into subsequent flow accommodation agreements for the 2010/11 and 2011/12 fiscal years. A current agreement was approved by the Board of Directors of both LACSD and OC San on July 1, 2012.

The flow accommodation agreement is fee-based, focusing primarily on residential parcels and flows. For the few industrial dischargers, the fees are based on flow, biochemical oxygen demand, chemical oxygen demand, and suspended solids. The originating district is responsible for administering and enforcing its industrial waste pretreatment program for industries in its service area, with terms and conditions of coordination and information exchange between the districts.

OC San has no industrial facilities discharging to LACSD. LACSD has four noncategorical permittees discharging to OC San, including Chemetall Oakite Corp., Coyle Reproductions, Inc., RockTenn CP, LLC, and T. Hasegawa USA Inc.

### **7.3 Irvine Ranch Water District (IRWD)**

IRWD is a California Water District in central Orange County, California, which is served by several Revenue Zones within the jurisdiction of OC San and other agencies. The northern and coastal parts of IRWD are served by OC San. The pretreatment program in these sections is managed by OC San. A small portion of the eastern part of IRWD, called Portola Hills, is currently sewered to Santa Margarita Water District, a member of the South Orange County Wastewater Authority (SOCWA). SOCWA administers the pretreatment program for its member agencies.

On January 1, 2001, the Los Alisos Water District (LAWD) consolidated with IRWD. LAWD owned and operated a 5.5-million-gallon-per-day (MGD) water recycling plant (Los Alisos Water Reclamation Plant (LAWRP)) whose tertiary effluent is used under permits granted by both Region 8 and Region 9 Water Quality Control Boards. Secondary wastewater effluent up to 7.5 MGD that is not recycled is discharged to the Aliso Creek Ocean Outfall in Laguna Beach. IRWD also uses its capacity in the Aliso Creek Ocean Outfall to dispose of brine from the Irvine Desalter and treated groundwater from its Shallow Groundwater Unit facility. SOCWA administers the pretreatment program for discharges to the ocean outfall.

Most of IRWD is in OC San's service area, which collects sewage for treatment at either IRWD's Michelson Water Recycling Plant (MWRP) or OC San's Reclamation Plant No. 1. Currently, most of the sewage generated within OC San's Revenue Zone No. 14 is treated at MWRP, which is a tertiary treatment plant with a design capacity of 28 MGD. MWRP's highly treated effluent meets the State of California Title 22 regulations for the reuse of recycled water. During calendar year 2021, IRWD began to process all biosolids

---

<sup>2</sup> County Sanitation District No. 3 of Orange County was a predecessor to OC San prior to consolidation of the various county sanitation districts into a single county sanitation district.

produced at MWRP. 100% of MWRP biosolids were treated and recycled at the MWRP Biosolids and Energy Facility during the 2022-2023 fiscal year.

### **7.3.1 IRWD Operating Permit, Regional Board Order R8-2015-0024**

On June 19, 2015, the Santa Ana Regional Water Quality Control Board (Regional Board) adopted Order No. R8-2015-0024, superseding Order No. R8-2007-0003. The Monitoring and Reporting Program under Order No. R8-2015-0024 requires an annual full priority pollutant scan, with quarterly samples analyzed for those pollutants that were detected in the annual scan. Additional Biosolids and Sludge monitoring is performed by IRWD.

IRWD organic priority pollutant analyses for influent, effluent, and sludge are provided following the narrative. IRWD has scheduled priority pollutant monitoring more frequently than required by permit to provide additional information to OC San on the quality of wastewater and sludge in Revenue Zone 14. IRWD will continue to monitor the influent, effluent, and sludge quarterly.

On September 7, 2018, the Regional Board adopted Order No. R8-2018-0070, amending Order No. R8-2015-0024, allowing for discharges to San Diego Creek under emergency conditions. IRWD is currently undergoing the process for permit renewal.

### **7.3.2 IRWD Analytical Reporting**

*Annually, the discharger shall submit... a summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants EPA has identified under Section 307(a) of the Act.*

The collection points for the influent, effluent and sludge samples are as follows:

Influent:	Collected at headworks before grit basins.
Effluent:	Collected at the end of the chlorine contact basin (CCB), but downstream of where the CCB effluent and ultraviolet (UV) disinfected effluent are combined, just prior to entering the recycled water distribution system.
Sludge:	Collected at the flow meter vault on the MPS-3 force main prior to ferrous chloride injection.

The sampling of influent, effluent and sludge is performed by Regulatory Compliance personnel according to the following protocol:

1. Grab samples are collected quarterly for influent, effluent, and sludge samples and analyzed for volatile organic priority pollutants.
2. Composite samples are collected for BNA extractables, inorganic priority pollutants, pesticides/PCBs, and phenols at each location. This sampling is performed with a Sigma sampler that collects discrete samples at hourly intervals over a 24-hour period. The discrete samples are composited according to flow, and aliquots are distributed into the appropriate sample container. All the samples are collected in glass bottles and distributed into the appropriate glass or plastic bottle.

Samples are submitted to the IRWD Water Quality Laboratory where they are analyzed in house or contracted to either Weck Laboratories located in the City of Industry, or Eurofins Test America Laboratory located in the City of Irvine. Collected samples are preserved, refrigerated, and shipped on ice as required to the specific lab for analysis. Each lab supplies their respective sample containers with the preservatives as required by the method.

The detection limits may vary from quarter to quarter due to matrix interference and sensitivity of the analytical equipment, however, the results for each quarter are valid for the detection limit reported. IRWD and its contract laboratories have endeavored to meet or exceed reporting levels established in permits.



### 7.3.3 Inorganic Pollutants

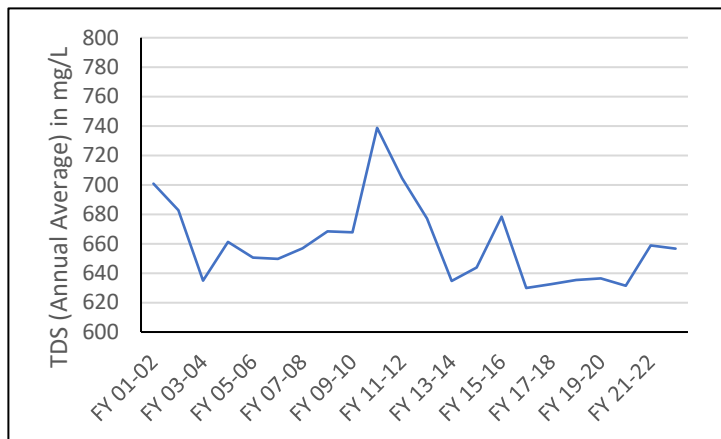
#### General Minerals

Because IRWD is a water recycling agency, MWRP effluent is subject to general mineral requirements to protect Basin Plan water quality criteria. IRWD utilizes local groundwater and imported water to supply its customer domestic water needs, and the quality of the recycled water is based on the quality of the domestic supply. The current Basin Plan standards for the Irvine Groundwater Basin is 910 mg/L Total Dissolved Solids (TDS), and the current TDS limit for discharges to recycled water reservoirs designated as “Waters of the State” is 720 mg/L. As a purveyor of recycled water, the IRWD goal is to provide high quality water regardless of standards applied in the basin and has implemented several projects which improve the quality of the domestic water supply, which results in improvement in the quality of recycled water. In 1991, IRWD prepared the Michelson Influent Wastewater Quality Improvement Plan which identifies procedures to be followed to produce the highest quality recycled water. An important feature of the plan was to maximize the delivery of high-quality domestic water during the period of greatest recycled water consumption. In April 2002, IRWD commissioned its Deep Aquifer Treatment System plant, an 8-MGD membrane filtration plant, to provide additional high-quality domestic water for its customers. The treatment plant removes natural organic matter in the form of color from a low TDS (250 mg/L on average) deep groundwater source. In January 2007, IRWD commissioned the Irvine Desalter Project – Potable Treatment Plant (PTP), a 5.5-MGD reverse osmosis plant and in March 2013 commissioned the Wells 21/22 Desalter Plant, a 6.3-MGD reverse osmosis plant, to provide high quality domestic water for its customers. Both desalter plants remove minerals from water in the Irvine Groundwater Basin to provide a target of 420 mg/L TDS in the final product water. All three treatment plants are designed to operate continuously, thereby decreasing consumption of high TDS imported water, and improving mineral quality of the MWRP effluent. IRWD still needs to import some higher TDS water to meet its water supply needs.

The minerals rejected by the reverse osmosis system for the PTP are discharged into the ocean through the Aliso Creek Ocean Outfall, and for the Wells 21/22 Desalter Plant are discharged to the sewer that goes to OC San’s Reclamation Plant No. 1. For FY 2022/23, PTP operation has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 2,940. For FY 2022/23, the Wells 21/22 Desalter has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 612 tons.

Additionally, IRWD has completed a Salt Management Plan that identifies management strategies, cost estimates for implementing recommended actions, and provide recommendations for policies that may be considered to manage recycled water salt concentrations throughout the District. Those policies addressed both current and future conditions that take into consideration changing source water conditions during drought conditions as well as water conservation practices that can all impact the TDS concentrations of the sewage treated at MWRP.

The seasonal change in MWRP effluent mineral quality, on a fiscal year annual average, is also shown in Figure 7-1. The recycled water mineral quality, as expressed by total dissolved solids (TDS), varied by 81 mg/L during 2022/23. The effect of providing higher quality domestic water can be seen in the gradual reduction in TDS of the recycled water over the last six years. The slight increase that occurred during fiscal year (2015/2016) could have been due to impacts from ongoing water conservation efforts and increased TDS concentrations from imported water supplies.

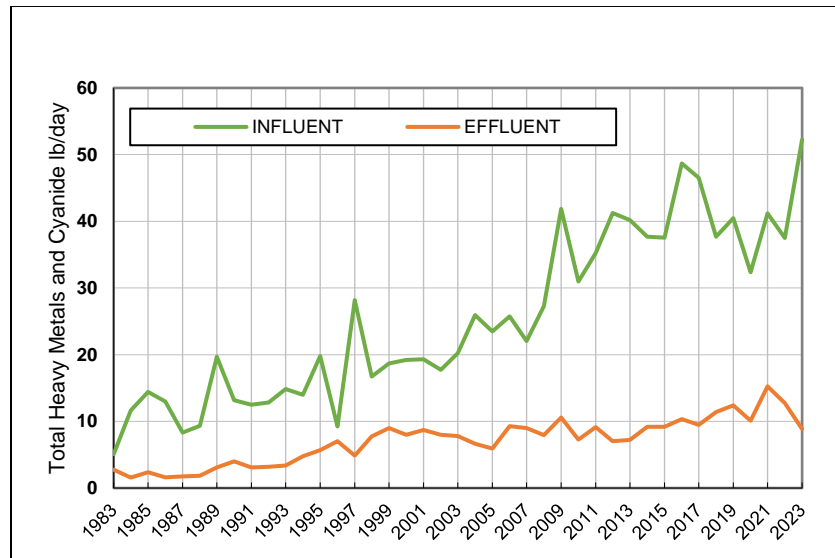


**Figure 7-1 MWRP Effluent Total Dissolved Solids (Annual Average)**  
Irvine Ranch Water District Michaelson Water Recycling Plant  
Orange County Sanitation District, Resource Protection Division

## Total Heavy Metals and Total Cyanide

IRWD has been analyzing the heavy metals and total cyanide on the list of inorganic priority pollutants for the last 40 years at MWRP. During the 40-year period, the total mass of heavy metals and cyanide has increased from 5 pounds per day (lbs./day) to the current 52.28 lbs./day in the influent, a 39.4% increase compared to the previous year, and has decreased in the effluent from 12.73 to the current 8.87 pounds per day in 2022/23, a decrease of 30.3% from the previous fiscal year.

Of all the priority pollutant heavy metals, only two, copper and zinc were found in significantly greater concentrations than remaining metals. The sum of mass of copper and zinc represents 80% of heavy metals found in the influent and represents 88% of what is found in the effluent, with zinc being the overall heavy metal contributor at both sampling locations. IRWD analyzes metals by ICP-MS which is capable of reporting metals in the sub part per billion range. Figure 7-2 shows the annual mass of total heavy metals and total cyanide in the influent and effluent of MWRP.

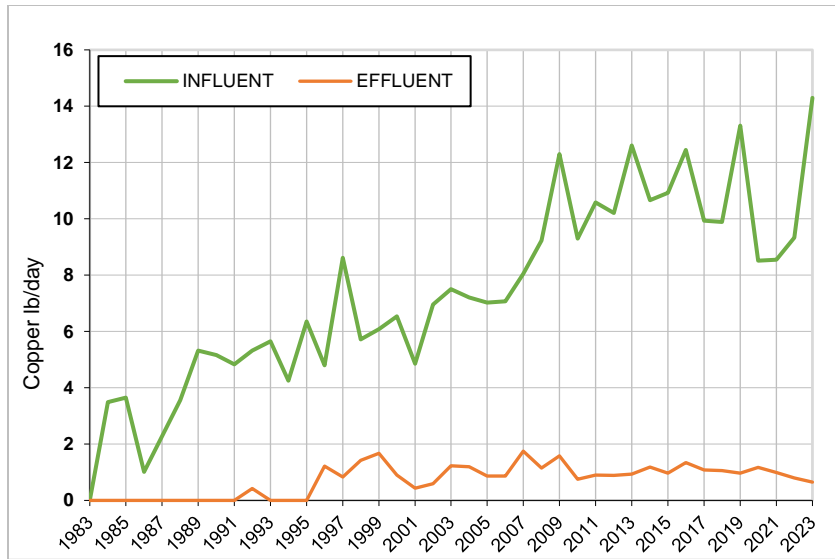


**Figure 7-2 MWRP Influent and Effluent Total Heavy Metals and Cyanide**  
Irvine Ranch Water District – Michelson Water Recycling Plant  
Orange County Sanitation District, Resource Protection Division

## Copper

The major source of copper is the common use of copper piping in domestic water systems and the printed circuit board industry. Both residential and nonresidential water plumbing are predominantly copper. Currently, IRWD does not have printed circuit board manufacturing in the MWRP service area, which is otherwise another common source of copper. The major commercial source of copper is believed to be radiator repair; however, copper from radiator repair activities is declining since many of the newer radiators are made from aluminum and plastic. Growth in the area tributary to MWRP has begun to increase over the last few years and the increase in the amount of copper being discharged could potentially be from new copper plumbing.

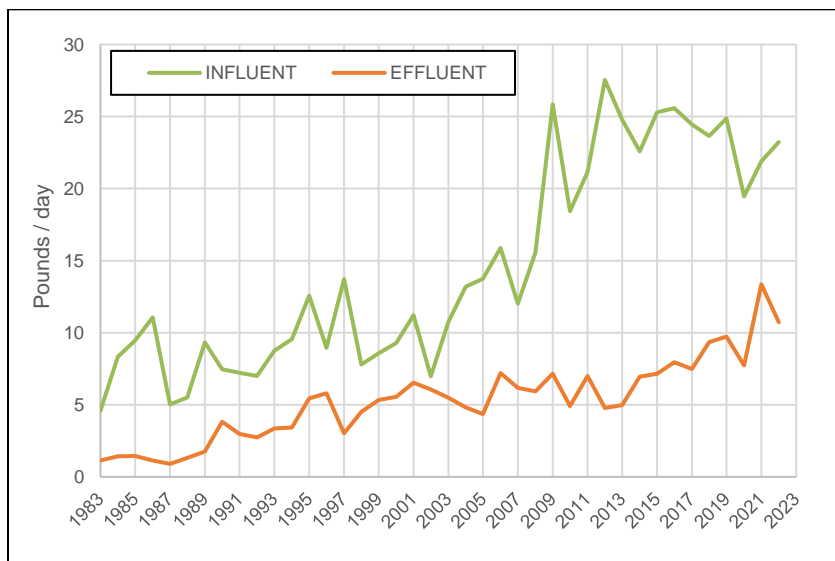
Figure 7-3 shows that the mass of copper in the influent has increased over the 40-year period from 3.5 to 14.30 lbs./day, while the effluent decreased to 0.65 lbs./day during the 2022/23 fiscal year. The mass of copper entering the treatment plant in 2022/23 increased by 53.2% from the 2021/2022 daily average. The mass of copper in the effluent dropped from 0.80 to 0.65 lbs./day. A decrease of 17.9% from the previous fiscal year.



**Figure 7-3 MWRP Influent and Effluent Copper**  
 Irvine Ranch Water District – Michelson Water Recycling Plant  
 Orange County Sanitation District, Resource Protection Division

**Zinc**

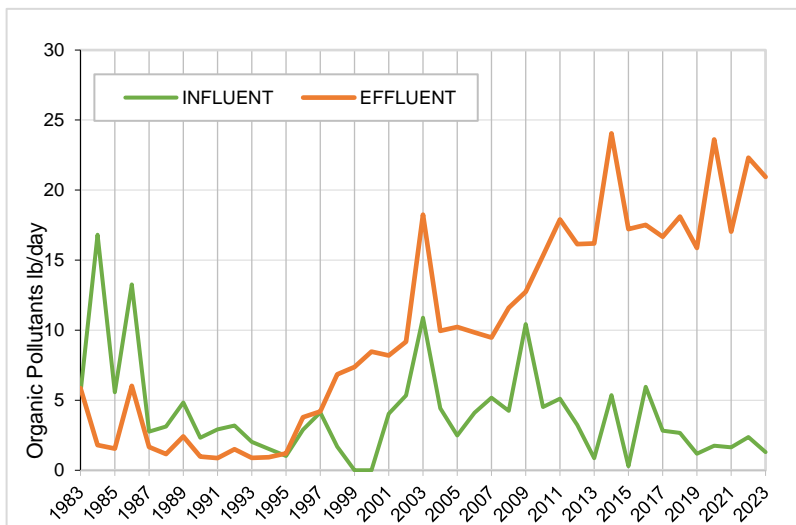
Zinc is the predominant heavy metal detected in both the influent and effluent. The major sources of zinc are brass alloys used in domestic water systems, water and oil-based paints used by the building industry, and in chemicals and coatings used by industry. The concurrent increase of zinc in the influent with copper suggest this is associated with residential building growth using copper and zinc piping and fixtures. Figure 7-4 shows that the mass of zinc in the influent has increased from 4.6 lbs./day to 27.64 lbs./day over 40 years. The influent mass of zinc increased by 4.42 lbs./day or a 19.1% increase from the previous fiscal year. The mass of zinc in the effluent has also increased from 1 lbs./day to 7.12 lbs./day over the last 40 years and saw a decrease of 3.61 lbs./day, or -33.6%, from the previous fiscal year.



**Figure 7-4 MWRP Influent and Effluent Zinc**  
 Irvine Ranch Water Department – Michelson Water Recycling Plant  
 Orange County Sanitation District, Resource Protection Division

### 7.3.4 Organic Pollutants

IRWD has been analyzing for organic pollutants on the list of organic priority pollutants at MWRP since 1983. The sampling frequency has increased from once per year to quarterly sampling. Samples are collected from the influent, effluent, and sludge. Figure 7-5 shows the annual mass of total organic pollutants in the influent and effluent of MWRP. Over the last 40 years, the annual mass of total organic pollutants entering MWRP has widely varied and has decreased from a high of 16.82 lbs/day to the current 1.287 lbs/day. The mass of total organic priority pollutants leaving MWRP decreased from 22.320 lbs/day in 2021/2022 to 20.936 lbs/day this fiscal year. The general increase in effluent organic pollutants above influent levels is attributed to an increase in trihalomethanes and other volatile organic compounds resulting from final effluent chlorination required to meet California Title 22 Water Recycling Criteria.



**Figure 7-5 MWRP Influent and Effluent Organic Pollutants**  
Irvine Ranch Water District – Michelson Water Recycling Plant  
Orange County Sanitation District, Resource Protection Division

IRWD has completed its 10 MGD biological nitrogen removal membrane filtration plant expansion at the MWRP and the plant is now operating within its design capacity. The UV Disinfection system went online November 2015 and the effluent total toxic organics concentration and mass has been reduced as the concentration of trihalomethanes and other volatile organic compounds resulting from effluent chlorination has been reduced.

#### Report of Upset, Pass-Through and Interference Events

*The discharger shall submit annually... a discussion of upset, interference, or pass-through incidents, if any, at the POTW which the discharger knows or suspects were caused by industrial users of the POTW system...*

There were no upsets, interference or pass-through incidents caused by industrial users during the reporting period.

### 7.3.5 Discussion of the List of Industrial Users

*The discharger shall submit annually... an updated list of the discharger's significant industrial users...*

Table 7.1 summarizes those companies in Revenue Zones Nos. 7 and 14 which were under permit and in business as of June 30, 2023. Class I industrial users in Revenue Zone 7 discharge to the IRWD collection system and are treated at OC San's treatment plant. Class I industrial users in Revenue Zone 14 discharge to the IRWD collection system and are treated at MWRP and at OC San's treatment plant.

<b>Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas</b> Orange County Sanitation District, Resource Protection Division – IRWD					
<b>Permit No.</b>	<b>Facility Name</b>	<b>Physical Address</b>	<b>NAICS Code</b>	<b>Classification</b>	<b>Plant</b>
1-541182	Alliance Medical Products, Inc.	9342 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-571332	Avid Bioservices, Inc.	14191 Myford Road (Tustin)	325414	Biological Product (except Diagnostic) Manufacturing	IRWD
1-071054	B. Braun Medical, Inc. (East/Main)	2525 Mcgaw Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-600382	B. Braun Medical, Inc. (North/Alton)	2206 Alton Parkway (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-541183	B. Braun Medical, Inc. (West/Lake)	2525 Mcgaw Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-601616	Bioduro LLC (Fairbanks)	72 Fairbanks (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-601617	Bioduro LLC (Jeronimo)	9601 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-600583	Brothers International Desserts (North)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600582	Brothers International Desserts (West)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600920	CP-Carrillo, Inc. (Armstrong)	17401 Armstrong Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-571316	CP-Carrillo, Inc. (McGaw)	1902 McGaw Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-071162	Electrolurgy, Inc.	1121 Duryea Ave. (Irvine)	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	OC San
1-600585	FMH Aerospace Corp.	17072 Daimler St. (Irvine)	332912	Fluid Power Valve and Hose Fitting Manufacturing	OC San
1-571314	Graphic Packaging International, Inc.	1600 Barranca Parkway (Irvine)	322212	Folding Paperboard Box Manufacturing	OC San
1-541178	Imuraya USA, Inc.	2502 Barranca Parkway (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-571327	Irvine Ranch Water District (Wells 21/22 Desalter)	1221 Edinger Avenue (Tustin)	221310	Water Supply and Irrigation Systems	OC San
1-601134	IsoTis OrthoBiologics, Inc.	2 Goodyear (Irvine)	339112	Surgical and Medical Instrument Manufacturing	IRWD
1-071056	Kraft Heinz Company	2450 White Road (Irvine)	311941	Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing	OC San
1-601313	LGM Subsidiary Holdings LLC	17802 Gillette Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San

<b>Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas</b> Orange County Sanitation District, Resource Protection Division – IRWD					
<b>Permit No.</b>	<b>Facility Name</b>	<b>Physical Address</b>	<b>NAICS Code</b>	<b>Classification</b>	<b>Plant</b>
1-071024	Maruchan, Inc. (Deere)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-601021	Maruchan, Inc. (Deere-South)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-141015	Maruchan, Inc. (Laguna Cyn)	15800 Laguna Canyon Road (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	IRWD
1-141023	Marukome USA, Inc.	17132 Pullman St. (Irvine)	311991	Perishable Prepared Food Manufacturing	OC San
1-601843	Meggitt (Orange County), Inc.	4 Marconi (Irvine)	334519	Other Measuring and Controlling Device Manufacturing	IRWD
1-071038	Newport Corporation	1791 Deere Ave. (Irvine)	334516	Analytical Laboratory Instrument Manufacturing	OC San
1-141012	Oakley, Inc.	1 Icon (Foothill Ranch)	339115	Ophthalmic Goods Manufacturing	IRWD
1-071235	Prudential Overall Supply	16901 Aston St. (Irvine)	812332	Industrial Launderers	OC San
1-571303	Rayne Dealership Corporation	17835 Sky Park Circle Suite M (Irvine)	454390	Other Direct Selling Establishments	OC San
1-600297	Shur-Lok Company	2541 White Road (Irvine)	332721	Precision Turned Product Manufacturing	OC San
1-600565	South Coast Baking, LLC	1711 Kettering St. (Irvine)	311821	Cookie and Cracker Manufacturing	OC San
1-141163	Tropitone Furniture Co., Inc.	5 Marconi (Irvine)	337124	Metal Household Furniture Manufacturing	IRWD
1-600010	Vit-Best Nutrition, Inc.	2832 Dow Ave. (Tustin)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-601581	Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	16122 Construction CircleWest (Irvine)	562212	Solid Waste Landfill	OC San

### 7.3.6 Discussion of Industrial User Compliance Status

*The discharger shall submit annually... a list or table characterizing the industrial compliance status of each SIU...*

The compliance status of each noncompliant SIU is shown in OC San's Pretreatment Program Annual Report.

### 7.3.7 Summary of SIU Compliance

*The District shall submit annually... a compliance summary table...*

A summary of compliance is shown in OC San's Pretreatment Program Annual Report.

**7.3.8 Discussion of Significant Changes in the Pretreatment Program**

*The District shall submit annually... a short description of any significant changes in operating the pretreatment program which differ from the previous year...*

There were no significant changes in operating the pretreatment program between the 2021/22 and 2022/23 fiscal years.

**7.3.9 Pretreatment Program Costs**

*The District shall submit annually... a summary of the annual pretreatment budget and the pretreatment equipment purchases.*

A financial summary of IRWD's pretreatment program is shown in Table 7.2. All the expenses shown in Table 7.2 are related to the operation of IRWD's pretreatment program by IRWD staff. All expenses incurred by IRWD under the Memorandum of Understanding between IRWD and OC San are summarized by OC San.

<b>Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2021 – 2022 and 2022 – 2023</b>			
Orange County Sanitation District, Resource Protection Division – IRWD			
<b>Project No.</b>	<b>Description</b>	<b>2021 – 2022 Labor</b>	<b>2022 – 2023 Labor</b>
3093	Quarterly PP	\$1,181	\$105.49
3094	Baseline PP	\$0	\$0
3095	PP Surveillance	\$0	\$0
3096	Compat. Surveillance	\$0	\$0
3098	Industry Info. Collection	\$30,975	\$39,489
3099	Eval. Data/Reports	\$0	\$0
3100	OC San/SOCWA	\$0	\$0
<b>Total</b>		<b>\$32,156</b>	<b>\$39,595</b>

IRWD records expenses based on project numbers which represent specific activities or groups of related activities. During fiscal year 2022/23, IRWD spent \$39,595 on the operation of its pretreatment program, which is an increase of \$7,439 from the previous year.

**7.3.10 Equipment Purchases for FY 2022 – 2023**

IRWD maintained its existing equipment inventory as shown in Table 7.3.

<b>Table 7.3 Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2022-2023</b> Orange County Sanitation District Resource Protection Division – IRWD	
Quantity	Description
1	Ford Ranger
4	Sigma AS 950 portable compact auto samplers with pH
1	Sigma 900 Max insulated auto sampler with conductivity and pH
1	Sigma SD 900 insulated auto sampler
3	Sigma compact insulated auto sampler base (spare base) – 24 bottle configuration
3	Sigma large insulated auto sampler base – 24 bottle configuration
2	Sigma large insulated auto sampler base – 12 bottle configuration
6	Sigma lead-acid gel battery
3	Sigma battery charger, 5 stations
2	Sigma data transfer unit (DTU) and software
2	USB flash drive
1	Digital pH probe
1	Analog pH probe
2	Analog electrical conductivity probe
1	MSA gas detector

### 7.3.11 Discussion of Public Participation Activities

*The District shall submit annually... a summary of public participation activities...*

IRWD has a standing program of MWRP tours, where the public is instructed on the sewage collection and treatment, as well as proper hazardous waste disposal practices. The Water 101 course and tour includes drinking and recycled waters as well as wastewater treatment. As an operator of a sewage collection system, IRWD is enrolled under the statewide general permit to manage fats, oils, and grease discharges from food service establishments. The public participation program is administered by IRWD staff with contractor support.

### 7.3.12 Discussion of Biosolids Treatment and Recycling Activities

*The District shall submit annually... a description of any changes in sludge disposal methods...*

IRWD began construction in October 2013 of its Biosolids and Resource Recovery Project, that consists of solids thickening, acid-phase anaerobic digestion, dewatering, drying/pelletizing, energy generation using microturbines, and use of pellets as a fertilizer or e-fuel. The project is currently in the commissioning phase, and once completed IRWD will only send solids to OC San for treatment as required. In fiscal year 2022/2023 IRWD was treating all its wastewater solids onsite in the Biosolids Facility producing Class B and Class A (pellets) biosolids.

### 7.3.13 IRWD Additional Information

*The District shall submit annually... any concerns not described elsewhere in the report.*

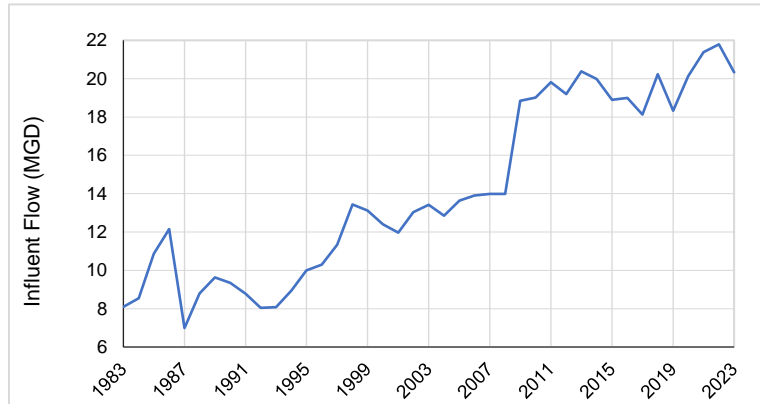
#### Michelson Water Recycling Plant Flow

Figure 7-6 shows the wastewater flow received by MWRP over the last 40 years. MWRP flow has generally increased over the years with a few exceptions. Average flow for the 2022/23 fiscal year was 20.33 MGD which was a 6.7% decrease from the previous fiscal year. The decrease in influent flow may be attributed to the abnormally wet winter, where IRWD had to divert sewage at a higher volume than normal from MWRP to OC San for treatment.



### Nitrification/Denitrification Facilities

IRWD completed a significant upgrade to MWRP by installing a nitrification/denitrification system on its activated sludge system in the 1998-99 fiscal year. Plant effluent is now fully nitrified year-round and substantially denitrified during the months when recycled water is stored in IRWD open storage reservoirs. A fully nitrified effluent means that IRWD maintains a free chlorine residual rather than a combined chlorine residual. A free chlorine residual causes a greater formation of trihalomethanes and related volatile organic compounds, which is evident by the presence of total toxic organic compounds in the effluent. Fortunately, the quality of plant effluent, detention time in the plant, and short time before storage or use, keeps the level of toxic organic compounds below regulatory criteria, even though a relatively high chlorine dose is required to maintain bacterial quality. The operation of the nitrification/denitrification system has improved activated sludge operations, which in turn, has increased the quality of recycled water.



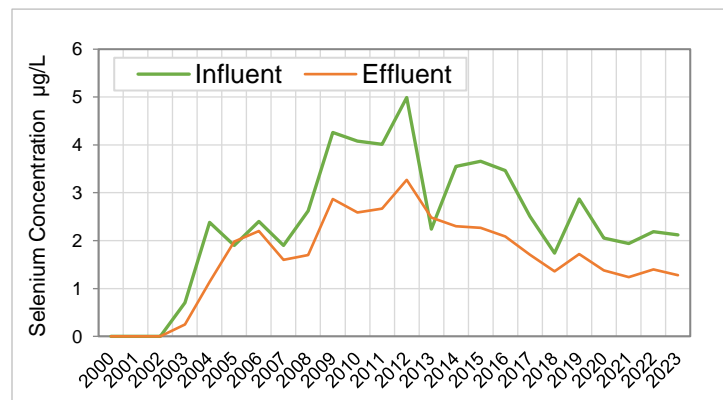
**Figure 7-6 MWRP Influent Flow**  
Irvine Ranch Water District – Michelson Water Recycling Plant  
Orange County Sanitation District, Resource Protection Division

### Industrial Parks Development Status

Since the early 1980s, MWRP has been receiving increased industrial wastewater flows from the Irvine Spectrum. The industrial parks located with IRWD's service area are primarily the Irvine Spectrum, a large industrial park located near the former El Toro Marine Corps Air Station and the Foothill Ranch industrial area, located north and east of the El Toro Marine Corps Air Station. The El Toro Marine Corps Air Station is decommissioned and will be the site of the Great Park Development, a master planned community. IRWD sees the potential for gradually increasing levels of organic pollutants and heavy metals as the Irvine Spectrum industrial park and Foothill Ranch sites continue to expand and develop. The University of California, Irvine is expanding the University Research Park located on the southern portion of the university. IRWD sees a potential for organic priority pollutant and heavy metal discharges from the industrial/research parks.

### Stormwater, Deminimis Discharges and Selenium

In May 2009, the Regional Board adopted the fourth term *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and Incorporated Cities of Orange County Within the Santa Ana Region Areawide Stormwater Runoff Orange County, Order R8-2009-0030*. A condition of this permit is a requirement that non-stormwater discharges be prohibited from discharge into the storm drain except for urban runoff and certain authorized non-stormwater discharges. As a result, there has been an increase of non-wastewater discharges into the sewer system. In general, these



**Figure 7-7 MWRP Influent and Effluent Selenium**  
Irvine Ranch Water District – Michelson Water Recycling Plant  
Orange County Sanitation District, Resource Protection Division

discharges contribute to the hydraulic loading to the sewer system and have not been a significant source of conventional and other pollutants.

The northeastern side of the Irvine Basin is dominated by coastal foothills, and historically runoff from the foothills deposited in a seasonal marsh called the Cienega de las Ranas. Natural weathering of the coastal foothills has exposed and eroded the Monterey Formation containing significant amounts of selenium, which over time have accumulated in the seasonal marsh. In addition to runoff, rising groundwater in the area of the seasonal marsh has raised the concentration of selenium in surface water well above the California Toxics Rule criterion of 5 µg/L. The seasonal marsh has been drained, first to promote agriculture, and then the agricultural land has been converted into urban development. Surface waters in the watershed are listed on the Section 303(d) list for selenium impairment, and discharges of water into the surface water system above 5 µg/L are regulated under the Basin Plan.

The effect of the additional prohibition of non-stormwater discharging into the storm drain system has resulted in additional non-stormwater flows being discharged into the sewer system containing significant levels of selenium from groundwater dewatering operations. Some of the discharges are tributary to OC San's sewer system, and the selenium is ultimately returned to the ocean. However, some of the discharges are tributary to the IRWD sewer system. IRWD has been tracking the fate and transport of selenium since 2002 to garner knowledge on the effect of the additional non-stormwater discharges on MWRP effluent quality. During this last fiscal year, the average effluent selenium concentration was approximately 1.28 µg/L, below the California Toxics Rule criterion. Prior to 2002, the concentration of selenium in the wastewater was negligible, because there was no selenium in the domestic water supply, there were no industries discharging selenium and non-wastewater discharges into the sewer system were prohibited. Because selenium toxicity is based on concentration, IRWD will continue to monitor the concentration of selenium in the influent and effluent from the MWRP.

#### IRWD Oversight Activities

IRWD has monitored four major trunklines within its service area for priority pollutants. Commercial, residential and industrial areas were monitored on an annual basis. One purpose of this monitoring is to establish a long-term history of priority pollutant discharges into the sewer system. Phthalates are used to maintain flexibility in plastic products and are commonly found. The low concentrations of these constituents are common and are considered emerging pollutants of concern.

Additionally, within the IRWD service area, industrial activities are regulated by the City of Irvine General Plan and Zoning Ordinances, which confines industrial uses to specific zones and the City of Lake Forest, which is the agency currently responsible for the Foothill Ranch Master Plan. Currently, IRWD is reassessing its monitoring programs and locations.

The IRWD service area encompasses the San Diego Creek watershed, the largest watershed that is tributary to Newport Bay. Newport Bay and its tributary watersheds are subject to Total Maximum Daily Load (TMDL) allocations for sediment, nutrients, pathogens, and toxics. IRWD does not discharge wastewater into surface waters, other than its open storage reservoirs; however, as the sole purveyor of water and recycled water in the watershed, IRWD has chosen to become involved with water quality management in the watershed. IRWD is constructing and managing wetlands, under the Natural Treatment Systems Project, which will remove pollutants of concern to the TMDL allocations. IRWD extends its services to assist commercial and industrial users to recognize the importance of site runoff water quality, point out sources of contamination and areas of potential contamination, and advice on corrective measures.

#### Local Limits Study

Due to the completion of IRWD's Phase II Expansion at MWRP, as well as the construction of a solids and biosolids handling facility, IRWD decided to undertake a technical evaluation of its local limits that began in 2016, and was completed and submitted to the Regional Board for their approval in October 2016. The local limits study evaluated if IRWD's current limits are protective of not only the new unit processes within IRWD but were also protective enough to ensure that IRWD can produce Class A exceptional quality biosolids, as well as potentially evaluate additional pollutants of concern. IRWD received approval of its

local limits by the Regional Board in 2018 and has had them adopted by IRWD's Board of Directors in May 2018. IRWD staff expect to conduct the next Local Limits Study during the next permit cycle, which is currently pending renewal.

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

OC San has a National Pollutant Discharge Elimination System (NPDES) permit for ocean discharge and is the Control Authority for the Pretreatment Program required by federal regulations. Because SAWPA discharges to OC San through the SARI Line, SAWPA is subject to OC San's Pretreatment Program. Through a 1991 Memorandum of Understanding (1991 MOU), OC San enabled SAWPA to be OC San's Delegated Control Authority for the Pretreatment Program in SAWPA's SARI Service Area. SAWPA's responsibilities to run a Pretreatment Program on behalf of OC San, ability to discharge to the SARI Line, and other financial factors are governed by agreements between OC San and SAWPA, including the 1991 MOU and a 1996 Wastewater Treatment and Disposal Agreement (1996 Agreement), as amended and succeeded. OC San routinely reviews all SAWPA Commission, Commission Workshop, and Project Agreement meeting agendas and minutes to stay current with the activities in the SAWPA area that may have an impact on the SAWPA Pretreatment Program. In addition, OC San routinely meets with SAWPA to coordinate at administrative, technical, management, and leadership levels with varying levels of staff in attendance at each meeting to improve the coordination between OC San's and SAWPA's Pretreatment Programs and to enhance the working relationship with SAWPA in all areas of the 1991 MOU and 1996 Agreement.

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 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 that is designed to carry saline wastewater from the Upper Basin to the Orange County Sanitation District (OC San) for disposal, after treatment, into the Pacific Ocean. This wastewater today consists primarily of desalter brine and saline wastewater from industrial uses, but also has some temporary domestic discharges. Wastewater from the Brine Line is transferred to the SARI Line in Orange County which transports the wastewater to Orange County Sanitation District (OC San) Plant No. 2. A flow meter installed at the Orange County line measures SAWPA's discharge. The capacity of the Brine Line available to SAWPA is 30 MG per day (MGD). For the 12-month period from July 1, 2022, through June 30, 2023, a total of 4,486 MG was discharged into the Brine Line, for an average of 12.29 MGD.

##### **7.4.1 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 Member Agencies, EMWD, IEUA, Valley District, and Western Water and Contract Agencies, City of Beaumont (Beaumont) Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), 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 Industrial Users (IU) located in their service areas.

SAWPA owns and operates the Brine Line above or upstream of the Orange County line and has purchased 17 MGD of treatment and disposal capacity rights at OC San's treatment facilities. 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. In addition, SAWPA has the

Permitting responsibilities for all Liquid Waste Haulers (LWH) that use the four SAWPA-approved Collection Stations. The SAWPA LWH permits assign, for each discharger, a primary collection station and alternate collection stations should the primary collection station become unavailable due to repairs or closure.

Agency staff assists in the conduct of the program for non-agency permittees within their service area. SAWPA conducts all pretreatment oversight activities for agency owned or affiliated permittees. SAWPA has identified, categorized, and summarized the permits herein by geographical location and support from the Member and Contract Agencies. Roles and responsibilities are defined in SAWPA's policies and procedures. SAWPA has two dedicated full-time pretreatment personnel and an additional 0.6 full-time equivalent (FTE) to assist with pretreatment responsibilities. Combined, the 2.6 FTE, along with additional personnel from both Member and Contract Agencies, prepared and issued permits, conducted inspections, prepared enforcement actions, and prepared monthly, quarterly, and annual reports by the date required.

During the reporting period SAWPA continued implementation of numerous program documents and worked to improve the operation and implementation of the Pretreatment Program. SAWPA and the Member and Contract Agencies use Pretreatment Program Control Documents (PPCDs) for uniform and consistent implementation of the Pretreatment Program. A Data Management System (iPACS) continued to be used.

The reporting below is individually presented for each SAWPA Pretreatment Program Member and Contract Agency.

#### **7.4.2 SAWPA, Member Agency, and Contract Agency Pretreatment Programs**

##### **7.4.2.1 The City of Beaumont (Beaumont)**

###### **Description of Beaumont**

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

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

###### **Enforcement Actions**

There was no enforcement action during this reporting period.

##### **7.4.2.2 Eastern Municipal Water District (EMWD)**

###### **Description of EMWD**

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

headquarters are located in Perris, California and serve 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.

#### **7.4.2.3 Inland Empire Utilities Agency (IEUA)**

### **Description of IEUA**

IEUA is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries located within IEUA's service area. IEUA, originally named the Chino Basin Municipal Water District (CBMWD), was formed in 1950 to supply supplemental water to the region. Since its formation, IEUA 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, IEUA 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 875,000 people. IEUA's service area includes the Cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, as well as the Cucamonga Valley Water District.

### **Enforcement Actions**

#### **C.C. Graber Company (Permit No. I1005-4)**

On January 26, 2023, A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to C.C. Graber Company for a pollutant discharge violation as well as submitting their Self-Monitoring Report after the required submittal date. On October 7, 2022, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The field laboratory analyses results collected on October 7, 2022, indicated a Sulfide (Dissolved) method detection limit of <1.0 mg/L, which exceeded the Daily Maximum Discharge Limitation of 0.5 mg/L as stated in Permit No I1005-4us. Additionally, the permittee failed to submit its October 2022, Self-Monitoring Report by the required due date of 11/7/2022 as required by Permit No. I1005-4. The Self-Monitoring Report was received more than forty-five (45) days after the required submittal date of November 7, 2022, placing the permittee in SNC for the review period July-Dec 2022. The NOV/OCA required the permittee to submit a written response that includes results of its investigation as to the cause of reporting violations and a detailed corrective action plan to prevent recurrence on or before February 2, 2023. Permittee responded on February 2, 2023, stating the company is operated by four family members that are responsible for reporting to IEUA. The permittee states all family members became ill for seven weeks with COVID-19 and failed to submit and review self-monitoring reports by the required due dates. As a corrective action the permittee has trained a long-term, seasonal employee to review and report to IEUA so reporting requirements will always be met. Enforcement closed on February 21, 2023. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at C.C. Graber Company to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **California Institution for Men (Permit No. D1006-5)**

On January 5, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to California Institution for Men (CIM) for failure to comply with flow meter monitoring requirements. On December 20, 2022, IEUA conducted a site inspection of the permittee's groundwater treatment facility. It was determined that the permittee was not recording its effluent wastewater instantaneous flow and could not provide historic flow data as required by Permit D1006-4. It was also determined that the permittee was not properly implementing Best Management Practices as required by Permit D1006-4. The NOV/OCA required the permittee to repair, replace or upgrade its flow monitoring system, repair or replace the valve

immediately downstream of its final wastewater holding tank, implement weekly cleaning of its monitoring flume and create and maintain a log to document these activities, and submit a written report detailing the cause of and corrective actions taken to prevent recurrence of these violations on or before January 12, 2023. The permittee responded on January 12, 2023, and January 18, 2023, stating its SCADA system was not trending brine flows and providing history and that the permittee's IT team was attempting to develop an Excel format to report flow that is downloadable. The permittee stated the Parshall flume was cleaned and will be de-scaled soon. The permittee also stated it has implemented weekly inspection and cleaning of its flume and will document these activities. Furthermore, the permittee indicates the wastewater holding tank outlet valve and Excel format project will be completed on or before February 17, 2023. The permittee responded on February 17, 2023, and stated it has repaired the leaking discharge valve, cleaned its flume, implemented weekly inspection and cleaning of the flume and these activities are being documented. The permittee stated its current SCADA system does not have the ability to monitor, record and generate a report of instantaneous flow data that can be provided to the control authority. On May 1, 2023, IEUA verified that the permittee installed a new flow meter capable of recording instantaneous flow and the ability to report this data as required by permit. The enforcement closed on May 1, 2023. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at CIM to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **Mission Linen Supply (Permit No. D1057-5)**

On November 14, 2022, a Notice of Violation and Order for Corrective Action was issued to Mission Linen Supply for a pollutant discharge violation. On October 14, 2022, the permittee collected a wastewater sample from Monitoring Point 001. The laboratory analysis results received on November 7, 2022, indicated a 1,4-dioxane value of 1.3 mg/L which exceeded the daily maximum discharge limitation of 0.9 mg/L as stated in Permit No. D1057-5. Furthermore, the permittee failed to notify IEUA of the violation as required by permit. The NOV/OCA required the permittee to submit a written response with results of its investigation as to the cause of these violations and a corrective action plan designed to bring the facility into consistent compliance on or before November 21, 2022. Additionally, the permittee was also required to conduct a special sampling event for 1,4-Dioxane and report results to IEUA on or before December 7, 2022. The permittee responded on November 14, 2022, stating its wash programs, formulas, discharge practices and chemistry remain consistent and there have not been any changes to its process or schedules. This response did not address failure to notify IEUA of the violation. The permittee then submitted an updated response on November 21, 2022, which explained that they had overlooked and misread the lab report and did not identify the violation. The permittee stated it will review laboratory analysis results carefully and notify of any further exceedance as required. The resample conducted on November 16, 2022, indicated a 1,4-Dioxane concentration of 0.0017 mg/L, in compliance with the Daily Maximum Discharge Limitation of 0.9 mg/L as stated in Permit No. D1057-5. The enforcement was closed on December 14, 2022. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Mission to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **Niagara Bottling, LLC (Permit No. I1114-3)**

On November 10, 2022, a Notice of Violation and Order for Corrective Action was issued to Niagara Bottling, LLC for a pollutant discharge violation. On October 4, 2022, the permittee collected a wastewater sample from Monitoring Point 001. The laboratory analysis results received on November 6, 2022, indicated a pH value of 5.94 S.U., which exceeded the Discharge Limitation of 6.0 S.U. as stated in Permit No. I1114-5. The NOV/OCA required the permittee to submit a written response with results of its investigation as to the cause of the violation and corrective action designed to bring the facility into consistent compliance on or before November 18, 2022. The permittee was 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 November 21, 2022, and attributed the cause to an HMI panel that malfunctioned, and this allowed the transfer of brine wastewater without proper pH adjustment. The permittee immediately ordered a new HMI panel and, in the interim, controlled the adjustment system manually. The HMI panel was replaced and reprogrammed. The reprogramming made the transfer of brine waste automated instead of relying on timers to transfer the brine wastewater. The resample collected on November 2, 2022, indicated a pH value 7.2 SU, in compliance with the discharge limitations of 6.0 -

12.0 SU as stated in Permit No. I1114-3. The enforcement was closed on December 7, 2022. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Niagara to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **7.4.2.4 Jurupa Community Services District (JCSD)**

##### **Description of JCSD**

JCSD is a public agency responsible for the implementation of certain pretreatment program activities for the direct industries connected to the Brine Line via JCSD's sewer collection system within its service area (Brine Line Reach IV-D). JCSD headquarters is located at 11201 Harrel Street in the City of Jurupa Valley. JCSD was formed in 1956 and provides water, sewer, park services, graffiti abatement, and street lighting. In 1988 the District formed the Community Facilities District (CFD) No. 1 to provide 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 Water for capacity in Reach IV-D of the Brine Line.

##### **Enforcement Action**

There was no enforcement action during this reporting period.

#### **7.4.2.5 San Bernardino Municipal Water Department (SBMWD)**

##### **Description of SBMWD**

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

##### **Enforcement Action**

##### **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 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. SBMWD will also collect a Copper resample in the first quarter of FY2023-2024. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at IWS to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

##### **Niagara Bottling, LLC (Permit No. I1111-3)**

On November 23, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Niagara Bottling, LLC for a pollutant discharge violation. On October 4, 2022, the permittee collected a

wastewater sample from Monitoring Point 001. The laboratory analysis results received on November 6, 2022, indicated a pH value of 5.94 S.U., which is less than the Discharge Limitation of 6.0 S.U. as stated in Permit No. I1111-3. The NOV/OCA required that the permittee submit a written report detailing the cause and the corrective actions taken to prevent recurrence of the violation to SBMWD by no later than November 30, 2022. The permittee responded on November 30, 2022, and attributed the cause of the violation to a malfunction of the timer control panel for the pH control valves and associated pump operations. The permittee replaced the control panel and modified programming to automate the transfer of wastewater to the secondary storage tank to maintain a constant level of pH adjusted wastewater without relying on system timers. An inspection conducted on November 2, 2022, indicated the pH system appeared to be in compliance and operating as required. The enforcement was closed on December 7, 2022. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Niagara to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **7.4.2.6 San Bernardino Valley Municipal Water District (Valley District)**

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

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

##### **Enforcement Action**

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

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on July 15, 2022, for pollutant discharge violations. On May 26, 2022, and May 27, 2022, the permittee's contracted laboratory collected wastewater samples from Monitoring Point 001. The Laboratory analysis received July 15, 2022, indicated a pH of 5.3 S.U. for the May 26 sample and a pH of 5.7 S.U. for the May 27 sample, which exceeded the limit of 6.0 S.U. stated in Permit No. 1130-1. The NOV/OCA required the permittee to submit a corrective action plan that identifies all steps taken or planned to correct the above listed pH violations no later than July 25, 2022. The permittee responded on July 25, 2022, and identified upgrading system optimization, installation of new membranes in the treatment process, and installation of a new screw press as corrective actions to improve plant control of wastewater prior to discharge. Follow-up pH monitoring indicated compliance. Enforcement was closed on August 22, 2022. 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.

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

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on July 22, 2022, for continued non-compliance with the interim Permit Limitation for BOD listed in Permit No. 1130-1 of 25 mg/L. The permittee collects daily samples for BOD in accordance with Permit No. 1130-1. The permittee exceeded the interim limitation for BOD for samples collected from Monitoring Point 001 on June 4, 5, 12, 16, 18, 19, 22, 24, 25, and 30, 2022. However, a permit amendment issued on July 14, 2022 (D1130-1.1), prior to determination of the above violations, which increased the interim BOD limit to 100 mg/L daily limit and 35 mg/L monthly average so no further action is required at this time. As none of the June exceedances were above the July 14, 2022, permit amendment limits and the monthly average did not exceed 35 mg/L the enforcement was closed on July 22, 2022. 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.



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

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on August 23, 2022, and discussed with the permittee, for pollutant discharge violations. The permittee collects daily samples for BOD in accordance with Permit No. 1130-1. The permittee exceeded the interim limitation for BOD for samples collected from Monitoring Point 001 on July 1, and 2, 2022. However, a permit amendment issued on July 14, 2022 (D1130-1.1), prior to determination of the above violations, which increased the interim BOD limit to 100 mg/L daily limit and 35 mg/L monthly average so no further action is required at this time. As none of the June exceedances were above the July 14, 2022, permit amendment limits and the monthly average did not exceed 35 mg/L the enforcement was closed on July 22, 2022. 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.

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

On September 30, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rialto Bioenergy Facility, LLC for pollutant discharge violations. The permittee collected a sample from Monitoring Point 001 on August 13, 2022, and September 22, 2022. The laboratory analysis indicated a pH of 5.9 S.U. for the August 13 sample and a pH of 5.8 S.U. for the September 22 sample, which exceeded the limit of 6.0 S.U. stated in Permit No. 1130-1. The pH is monitored continuously, and the facility has remained in consistent compliance with pH since the September 22, 2022, violation. Additionally, the permittee had since implemented the corrective actions identified following the July 15, 2022, NOV/OCA. Enforcement was closed on October 1, 2022. 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.

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

On January 4, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rialto Bioenergy Facility, LLC for pollutant discharge violations. On November 28, 2022, the permittee's contracted laboratory collected a wastewater sample from Monitoring Point 001. The laboratory analysis received on January 3, 2023, indicated a pH value of 4.33, which is outside the permitted range for pH which is 6.0-12.0 pH units as stated in Permit No. D1130-1.1. The NOV/OCA required the permittee to submit a written response with results of its investigation as to the cause of the violation and corrective action designed to bring the facility into consistent compliance on or before January 14, 2022. The permittee responded on January 13, 2023, identifying the cause of the exceedance and has implemented corrective action actions as appropriate. The cause was attributed to the facility's Regenerative Thermal Oxidizer (RTO) that tripped offline due to a burner fault which then shuts down the SO<sub>2</sub> scrubber that includes a caustic pump used in the neutralization process. Corrective actions include more frequent checks of the system operations, increased training of staff, and improved procedures related to the RTO system. The enforcement was closed on January 30, 2022. 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.

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

On March 6, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rialto Bioenergy Facility, LLC for pollutant discharge violations. The Self-Monitoring Report received by Valley District on March 3, 2023, indicated three violations of the interim discharge limitations for the parameters of BOD and TSS. The NOV/OCA required the permittee to submit a written response with results of its investigation as to the cause of the violation and corrective action designed to bring the facility into consistent compliance on or before March 16, 2023. The permittee responded on March 14, 2023, and attributed the violations to a pH disturbance in the aeration tank, causing instantaneous fluctuations. This pH disturbance occurred while the permittee was troubleshooting and adjusting parameters in the Membrane Bio Reactors. The permittee installed controls to ensure that pH is not changed so drastically, by creating a method of slow addition of acid or base to the aeration tank for much more gradual changes. Following issuance of the NOV/OCA additional violations were reported by the permittee. Escalated enforcement for these violations will be issued in the first quarter of FY2023-2024. 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.

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

##### **Description of SAWPA**

SAWPA is a Joint Powers Authority, classified as a Special District under State of California law, responsible for the implementation of the pretreatment program for the industries connected to the Brine Line. SAWPA consists of five Member Agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western 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 Actions**

There was no enforcement action during this reporting period.

#### **7.4.2.7.1 SAWPA Waste Hauler 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.

##### **Existing Permits – Permitted Waste Haulers**

- **Alpha Petroleum Transport, Inc. II (Permit No. H1126-4)  
22740 Temescal Canyon Road, Corona, CA 92883**
- **Environmental Management Technologies, Inc. (Permit No. H1025-4.5)  
1456 S. Gage Street, San Bernardino, CA 92408**
- **Haz Mat Trans, Inc. (Permit No. H1033-4.1)  
230 E. Dumas Street, San Bernardino, CA 92408**
- **Inland Water Services (Permit No. H1066-4.1)  
939 West Reece Street, San Bernardino, CA 92411**
- **K-VAC Environmental Services, Inc. (Permit No. H1049-4.1)  
8910 Rochester Avenue, Rancho Cucamonga, CA 91730**
- **SB Industrial Vacuum Services Inc. (Permit No. H1135-1)  
10656 Jaggery Street, Fontana, CA, 92337**
- **Triumvirate Environmental Services, Inc. (Permit No. H1132-1.1)  
10600 S Painter Ave, Santa Fe Springs, CA, 90670**
- **Western Environmental Services, Inc. (Permit No. H1098-4)  
400 W. Foothill Blvd., Suite H, Glendora, CA 91740**

##### **Enforcement Action**

There was no enforcement action during this reporting period.

#### **7.4.2.8 Western Municipal Water District (Western Water)**

##### **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 (Reach IVD, Reach IVB and Reach V). 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 the 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 Water 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. The Western Water 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**

###### **Frutarom USA, Inc. (Permit No. D1029-3.1)**

A Notice of Violation and Order for Corrective Action (NOV) was issued on July 26, 2022, for deficient submittal of a required Self-Monitoring Report (SMR). On July 7, 2022, the permittee submitted its semi-annual SMR. Review of this submittal found the SMR to be incomplete and otherwise deficient. The permittee was given a due date of July 18, 2022, for the revised, corrected SMR. On July 19, 2022, the semi-annual SMR was received past due and still otherwise deficient. The NOV/OCA required the permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than August 8, 2022. In addition, the NOV/OCA required the permittee to attend mandatory data submittal refresher training, conducted by Western Water, for designated permittee staff no later than August 12, 2022. The corrective action response letter submitted by the permittee was received on August 3, 2022, and identified administrative changes made to ensure SMR submittals are complete and accurate. The required data submittal refresher training was completed on August 9, 2022. Enforcement was closed on August 9, 2022. Western Water shall continue to conduct unannounced inspections and wastewater monitoring at Frutarom USA, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

#### **7.4.2.9 Yucaipa Valley Water District (YVWD)**

##### **Description of YVWD**

YVWD is a Water District responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area. Currently there are no permitted users within the YVWD service area. YVWD was formed on September 14, 1971, when the Secretary of 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. The demineralization process involves a reverse osmosis system that separates small molecules from the recycled water supply. In 2012, the YVWD completed the extension of the Inland Empire Brine Line operated by the Santa Ana Watershed Project Authority. The brine disposal facility is critical to insure the YVWD meets the stringent water quality objectives set by the Regional Water Quality Control Board for the Yucaipa Management Zone, Beaumont Management Zone and the San Timoteo Management Zone.

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

### **Enforcement Action**

There was no enforcement action during this reporting period.

#### **7.4.3 Self-Monitoring Program**

A self-monitoring program is required of permittees discharging to the Brine Line. The self-monitoring reports (SMRs) are delivered to the applicable agency for review and action if required. The SMR water quality data is included in the SAWPA Data Management System.

#### **7.4.4 Field Inspection, Sampling, and Monitoring QA/QC**

SAWPA conducts sampling QA/QC in accordance with EPA requirements including equipment blanks and field blanks. Analysis of the QA/QC data indicated samples collected were representative and free of contamination.

#### **7.4.5 Identification of New Permittees**

SAWPA requires a wastewater discharge permit for all facilities with discharge to the Brine Line, except for certain areas in the JCSD and Western Water service areas, therefore new permittees are identified upon their completion of a wastewater discharge permit application. Most new companies identified by SAWPA or upstream agencies in areas upstream of emergency connections are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. Facilities identified upstream of emergency connections requiring a permit are responded to by the upstream agency with oversight by SAWPA. These permitted facilities are listed in the corresponding agency's Annual Reports.

### **The City of Beaumont**

In the Beaumont service area upstream of the City of Beaumont wastewater treatment plant, Beaumont checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by Beaumont as required. Beaumont obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks.

### **Eastern Municipal Water District**

In the EMWD service area all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by EMWD and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

### **Inland Empire Utilities Agency**

In the IEUA service area, IEUA collaborates with the City of Chino to identify industries that may be subject to Federal Categorical Standards or local limits. No industries are allowed to connect to the Brine Line until

they have entered into a capacity right agreement with IEUA and obtained a wastewater discharge permit issued by IEUA and SAWPA as required. IEUA in partnership with the City of Chino obtains new business information from the following:

- City business licensing departments
- Industrial User Survey questionnaires
- City utility service requests
- City referrals during stormwater inspections

Most new companies that could potentially connect to the Brine Line are identified by IEUA field inspectors while out inspecting current permittees and when following up on tips provided by the City of Chino Source Control Division.

### **Jurupa Community Services District**

In the JCSD service area, SAWPA checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by SAWPA and JCSD as required. SAWPA or JCSD obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

JCSD will conduct regular inspections of all customers connected to the Inland Empire Brine Line (Brine Line) to verify the type of wastewater generated at their location. In addition, any closed-circuit TV (CCTV) revealing a possible illegal connection will be investigated. The majority of new companies identified by SAWPA or upstream agencies in these scenarios are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. A priority determination is assigned as follows: High Priority – any non-permitted facility generating industrial wastewater is inspected and monitored annually for local limits, Medium Priority – any dry manufacturing facility is inspected every 2 years unless changes to manufacturing and Low Priority – warehouse/commercial business is inspected every 5 years. Facilities identified in the JCSD service area requiring a permit is reviewed by SAWPA with final permit concurrence by OC San. Facilities identified upstream of emergency connections in other jurisdictions requiring a permit are reviewed by the upstream agency with oversight by SAWPA.

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

In the SBMWD service area all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by SBMWD and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

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

In the Valley District service area, all new proposed connections must complete a permit application that is thoroughly reviewed by Valley District and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

### **Western Municipal Water District**

In the Western Water service area, except for the areas upstream of the City of Corona Water Reclamation Facility (WRF) No. 1 and the Western Riverside County Regional Wastewater Authority (WRCWRA) South Regional Pump Station (SRPS), all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by Western Water and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit. For the Corona WRF No. 1 emergency discharge connection, Western directs the City of Corona, with oversight by SAWPA, through their industrial wastewater survey process. The City of Corona is alerted of any new business moving into their jurisdiction through the building department and business license process. New businesses are given a pretreatment questionnaire which is returned to the Source Control Department and reviewed. Source Control personnel visit the site to verify the information submitted in the questionnaire.

In the Western Water service area with potential to discharge to the Brine Line in an emergency condition from the WRCRWA SRPS, WRCRWA checks for various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by WRCRWA agencies as required. WRCRWA obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires completed by new water/sewer customers, with verification by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

### **Yucaipa Valley Water District**

In the YVWD service area upstream of the Henry Wochholz Regional Water Recycling Facility, YVWD checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by YVWD as required. YVWD obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires completed by new water/sewer customers, with verification by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

#### **7.4.6 Future Projects That Will Affect Quantity of Discharge to the Brine Line**

**California Institution for Women (CIW)** which had been formerly identified as primarily domestic (reclaimable) wastewater had been previously reported to be diverted to the Pine Avenue Sewer, away from the Brine Line, when the diversion project is completed. However, review of the monitoring data from the facility's discharge to the Brine Line indicates an average TDS of greater than 550 mg/L, which would not be suitable for discharge to local POTWs. As such, it is planned for CIW to continue to discharge to the Brine Line for the foreseeable future.

**Eastside Water Treatment Plant** is currently undergoing a plant expansion to double their water production capacity at the existing plant. The plant will also be constructing a lateral to directly connect to the Brine Line. The construction of the lateral was completed during Fiscal Year 2022/2023 and the facility will begin discharge through the connection during the first quarter of Fiscal Year 2023/2024.

**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 it 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.

#### **7.4.7 SAWPA Special Projects**

SAWPA conducted the following special project efforts during the reporting period:

1. Right of Way Maintenance – 37,565 feet maintained throughout Brine Line Service Area.
2. Air/Vac Structure Maintenance – 54 structures cleaned, inspected, and overhauled on Reach V.
3. Air/Vac Structure Maintenance – 32 locations were cleaned and weeded on Reach V.
4. Air/Vac Structure Maintenance – 10 cans were cleaned and painted on Reach V.
5. Air/Vac Structure Maintenance – 2 isolation valve can was replaced on Reach V.
6. Air/Vac Structure Maintenance – 2 new frame and cover assemblies installed on Reach V.
7. Air/Vac Structure Maintenance – 5 new frame and cover assemblies installed on Reach IV-A Upper for Prado Dam project.
8. Air/Vac Structure Maintenance – 9 new frame and cover assemblies installed on Reach IV-D for Prado Dam project.
9. Air/Vac Structure Maintenance – 5 structures cleaned, inspected, and overhauled on Reach IV-B Lower.
10. Air/Vac Structure Maintenance – 1 structure cleaned, inspected, and overhauled on Reach IV-E.
11. 506 USA tickets marked.

<b>Table 7.4 Summary of SAWPA Special Projects, July 1, 2022 – June 30, 2023</b> 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
Line Inspection			2,000 Feet	1.49 Miles					
Line Cleaning			600 Feet	1.49 Miles					
MAS Inspection	5	18	15	22	14	14	3	28	6
MAS R&R			9			5			
Pot Holing								6	
Frame and Cover R&R		6	4			5			

#### 7.4.8 SAWPA Member and Contract Agency Ordinances and Resolutions

- SAWPA adopted Ordinance No. 8 and Local Limits Resolution 2017-11 on September 19, 2017.
- EMWD adopted EMWD Ordinance No. 91.3, incorporating the changes made for SAWPA Ordinance No. 8 on May 2, 2018.
- IEUA adopted IEUA Ordinance No. 106, incorporating the changes made for SAWPA Ordinance No. 8 on February 21, 2018.
- JCSD adopted the JCSD Brine Line Ordinance 423 on January 8, 2018, incorporating the changes made for SAWPA Ordinance No. 8. JCSD adopted JCSD Brine Line Ordinance 424, incorporating the changes made for SAWPA Resolution 2017-11 on January 22, 2018.
- SBMWD adopted SAWPA Resolution No. 2017-11 with SBMWD Resolution No. 918 on October 17, 2017. SBMWD adopted SAWPA Ordinance No. 8 with SBMWD Resolution No. 919 on October 17, 2017.
- Valley District adopted Valley District Ordinance No. 80, incorporating the changes made for SAWPA Ordinance No. 8 on June 19, 2018.
- Western Water adopted Western Brine Line Ordinance No. 389, incorporating the changes made for SAWPA Ordinance No. 8 on March 21, 2018.
- YVWD adopted SAWPA Ordinance No. 8 by Resolution on October 3, 2017. YVWD adopted SAWPA resolution No. 2017-11 by Resolution on February 6, 2018.

#### 7.4.9 Public Participation

None.



#### 7.4.10 Permittees in Significant Noncompliance

<b>Table 7.5 Summary of SAWPA and Member/Contract Agency Permittees in SNC</b> <b>July 1, 2022– June 30, 2023</b> Sana Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division		
Company Name	Permit No.	Reporting or Discharge Violation
EMWD Permittees		
None		
IEUA Permittees		
C.C. Graber Company	I1005-4	Reporting Violation
JCSD Permittees		
None		
SBMWD Permittees		
None		
Valley District Permittees		
None		
SAWPA Permittees		
None		
Western Water Permittees		
None		

#### 7.4.10.1 Summary of Permittees in SNC Newspaper Notice

- **C.C. Graber Company (Permit No. I1005-4)**

It has been determined that C.C. Graber Company is in Significant Non-Compliance (SNC) with Wastewater Discharge Permit No. I1005-4 during the review period July 1, 2022, through December 31, 2022, for failing to submit its Self-Monitoring Report for the monitoring period October 1, 2022, through October 31, 2022, within forty-five (45) days of the November 7, 2022, the required due date. The method of determining SNC is explained in 40 CFR 403.8 (f)(2)(viii) (A) through (H) and Section 109 of IEUA Ordinance No. 106. In order for IEUA and SAWPA to comply with the public participation requirements of 40 CFR Part 25 in the enforcement of national pretreatment standards, C.C. Graber will be included in the annual public notification of facilities which were SNC during the previous twelve months.

#### 7.4.11 Non-Industrial Source Control and Public Education Programs

EMWD supports an extensive education program designed to provide useful academic experience at all grade levels.

IEUA educates its permittees during site inspections when applicable for typical outreach efforts such as FOG and hazardous waste education.

JCSD's Pretreatment staff coordinates public outreach in cooperation with JCSD's Community Affairs Staff. The public outreach occurs in community newsletters, public outreach events such as JCSD's Open House and Wellness Events, and JCSD's website. Topics include FOG Control, root control, hazardous waste disposal and Sewer System Management Plan components. Information is provided to the dischargers during the permit renewal process and site inspections.

SBMWD implements a number of outreach programs to educate industry and to minimize pollutants discharged. Field inspectors provide Best Management Practice (BMP) brochures during site inspections to educate industry and minimize the discharge of pollutants. SBMWD operates a quarterly Silver Waste Disposal Program to provide a disposal site for small quantity silver generators within the service area.

Valley District provides public educational information to their customers to encourage the efficient use of water through advertising, classroom instruction, contests, paying 25% of retail water agency rebates, etc.

In collaboration with its retail water agencies, iEfficient.com was created, which provides water-saving tips and information on water issues. Valley District conducts regular Board Meetings which are open to the public on the 1st and 3rd Tuesday of each Month. Valley District also provides public information via their website at <http://www.sbvmd.com/> which includes scheduled events and other opportunities for public participation on a variety of issues.

Western Water provides public educational information to their customers to encourage the efficient use of water through advertising, rebates, programs, and workshops.

#### **7.4.12 Other Public Participation**

SAWPA Agency Dental Amalgam Programs

##### **City of Beaumont (Beaumont)**

The Beaumont Wastewater Treatment Plant (WWTP) has no direct connections from dental facilities within their jurisdiction. Beaumont has one permit, issued by SAWPA, for the Beaumont WWTP that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the Beaumont WWTP, Beaumont identified 14 dental facilities in the service area, 4 of which are non-amalgam users such as orthodontics. Beaumont has on file Dental Discharger Compliance Reports for all 14 dental facilities. Each facility is inspected annually.

##### **Eastern Municipal Water District (EMWD)**

EMWD has no areas of discharge to the Brine Line which have dental facilities.

##### **Inland Empire Utilities Agency (IEUA)**

IEUA has no direct connections to the Brine Line from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires IEUA to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the IEUA regional plants. IEUA has completed the inventory of dentists that discharge from this area which includes portions of the cities of Chino and Chino Hills. IEUA has sent the one-time compliance report (OTCR) survey to these dental facilities. A second and third round of the OTCR surveys were sent to non-respondents in November 2019 and February 2020, respectively. IEUA placed phone calls to remaining non-respondent dental facilities during August and September 2020. IEUA sent another round of OTCR surveys to non-respondent dental facilities in October 2020. IEUA and their member cities reached out to the non-respondent dental facilities in June 2021. Since June of 2022, IEUA received one (1) OTCR report from new dental facilities and confirmed closure of five (5) facilities within the cities of Chino and Chino Hills. To date approximately 99% of the OTCR surveys have been received from dental facilities identified within the cities of Chino and Chino Hills.

##### **Jurupa Community Services District (JCSD)**

JCSD has no dental facilities from the areas with direct connections to the Brine Line. In the event an emergency discharge event occurs, which requires JCSD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the WRCRWA or City of Riverside Treatment Plants. JCSD has issued surveys to all dental facilities that discharge within the service areas that require a letter to discharge to the Brine Line. All open facilities have submitted their one-time compliance report (OTCR) and have been inspected to verify compliance.

##### **San Bernardino Municipal Water Department (SBMWD)**

There are no dental facilities within the SBMWD service area which have a direct connection to the Brine Line. In the event an emergency discharge event occurs, which requires the SBMWD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the SBMWD Water Reclamation Plant. The SBMWD Environmental Control Section has actively implemented a Dental Amalgam Program beginning in 2016 with 155 dental facilities identified within the service area. All the facilities have been

inspected with one hundred and fifteen (115) dental industrial users submitting the required compliance report and the remaining forty (40) facilities determined to have either ceased operations or have not been classified as dental industrial users (i.e., dental imaging only, veterinarian clinics, orthodontics only). In 2021, SBMWD Environmental Control conducted inspections which identified one hundred and two (102) active dental facilities with the required compliance reports on file and fifty-three (53) facilities determined to have ceased operations or are not classified as dental industrial users.

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

Valley District has no areas of discharge to the Brine Line which have dental facilities.

### **Western Municipal Water District (Western Water)**

Western Water has no direct connections from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires Western Water to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge from the following service areas:

- **Corona WRF No. 1.**

Corona has moved from the preliminary survey to on-going monitoring via the new business license list that is received monthly. Corona is still conducting on-going surveying of all dental offices coming through their plan check process. There are a total of 120 facilities that are being tracked and Corona still monitors new and used business licenses to ensure all dental offices are submitting the proper documentation.

- **WRCRWA SRPS**

WRCRWA has four agency jurisdictions that discharge to the WRCRWA SRPS: Western Water, Home Gardens, City of Norco, and intermittently, City of Corona. The Western Water area is residential, and no dental facilities have been identified. Home Gardens has issued surveys to all dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction. All dental facilities have been surveyed and have been made aware of the dental amalgam rule. Currently, no dental offices within Home Gardens use Amalgam. The City of Norco has identified all the dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction and has issued surveys to these facilities. At this time twelve surveys have been returned. The City of Norco currently reviews new dental office surveys as part of their business licensing process.

### **Yucaipa Valley Water District (YVWD)**

YVWD has no direct connections from dental facilities within their jurisdiction. YVWD has one permit, issued by SAWPA, for the Henry Wochholz Water Reclamation Facility that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the YVWD Henry Wochholz Water Reclamation Facility YVWD has received all the surveys back.

#### **7.4.13 Changes to the SAWPA Pretreatment Program**

SAWPA has continued to refine a new Pretreatment Program developed in 2013. SAWPA staff consists of a Manager of Permitting and Pretreatment, a Pretreatment Program Specialist, with an additional 0.6 full-time equivalent consisting of other SAWPA personnel. SAWPA oversees the Brine Line program with assistance from Pretreatment Program managers, senior management, and inspectors from the Member and Contract Agencies. A full description of personnel available to the Brine Line program is detailed in 7.4.14.

Two working groups made up of 1) Pretreatment Program managers; and 2) managers and senior management met during the year to coordinate the work of the Pretreatment Program team. Working group meetings are utilized to review Brine Line procedures, discuss upcoming pretreatment issues, and provide training on various topics related to the program. SAWPA continued an Inter-Agency training program to promote the continued growth of all agency inspectors. Inspectors from each agency accompany a different

agency on an inspection each quarter to observe inspection practices, but also see new types of facilities, broadening each inspector's experience.

SAWPA conducted the Semi-Annual Brine Line Audit with the distributed pretreatment program administered by the SAWPA Agency staff. SAWPA compiled the individual agency audit reports and issued these to each Agency in December of 2021. During these audits SAWPA personnel ensure agencies were performing inspection, monitoring, permitting, and enforcement activities in line with the SAWPA policies and procedures. SAWPA personnel reviewed documentation for completeness, accuracy, and adherence to SAWPA policies and consistency between agency programs. SAWPA observed no major findings at any of the member or Contract Agencies.

#### **SAWPA Draft Pretreatment Program Control Documents Submittal**

SAWPA Submitted draft updates to the Pretreatment Program Control Documents (PPCDs), also known as the SAWPA Policy and Procedures, for OC San's review on April 2, 2018. These documents have been updated to incorporate OC San's outstanding comments from their 2013 review of the PPCDs, to incorporate changes due to SAWPA Ordinance No. 8 and Local Limits Resolution 2017-11, as well as to incorporate any program changes SAWPA has made since 2013. SAWPA also engaged OC San regarding a potential Stormwater Policy based on the OC San Business Washpad Rule. SAWPA's intent was to employ the Policy requiring a SOP for facilities that had potential to discharge stormwater as outlined in the draft Policy. SAWPA has previously shared the draft Stormwater Policy with OC San. SAWPA understands that OC San wished to withhold any potential concurrence on this document until a template SOP for the Stormwater Policy could be reviewed. These documents were submitted alongside the Draft Pretreatment Program Control Documents submittal on April 2, 2018. In a letter dated February 15, 2019, OC San responded to the April 2, 2018, Draft Pretreatment Program Control Documents submittal with submittal review comments. SAWPA and OC San have met to review these comments in more detail however it was agreed that work on the PPCDs should wait until completion of Ordinance No. 9.

OC San has completed the process of updating and revising their Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OC San, SAWPA is required to update their Ordinance to include relevant OC San revisions. SAWPA has developed draft Ordinance No. 9, which has been revised to incorporate the updates within the new OC San Ordinance. The proposed updates include a new prohibition on hydrolysate, a new prohibition on discharge via non-domestic surface or floor drains, and clarification of existing language for facility reports of changed conditions and notifications for sale of change of ownership. Additionally, SAWPA has proposed additional revisions to update the definition of an Industrial User to standardize it with the OC San definition. Furthermore, SAWPA has proposed creation of a new classification of Non-Industrial User for Brine Line dischargers that do not meet the definition of an Industrial User. SAWPA has also created a new authorization process, a Connection Authorization, that will allow greater flexibility in managing infrequent discharges to the Brine Line. SAWPA submitted the most recent draft of Ordinance No. 9 to OC San on November 6, 2020, and have been working collaboratively with OC San throughout the years to further refine this revision.

#### **7.4.14 Pretreatment Program Budget**

##### **Staffing – EMWD**

As of June 30, 2023, the Pretreatment Program staff consisted of 1 manager, 1 senior analyst, 1 analyst, 2 senior inspectors, and 5 field inspectors, for a total of 10 staff members. The total estimated budget for Brine Line FY 2022/23 was \$403,942.

##### **Staffing – IEUA**

As of June 30, 2023, the Pretreatment Program staff consists of 1 manager, 1 engineer, 4 field inspectors, and 1 administrative support personnel for a total of 7 staff members. The total estimated budget for FY 2022/23 was \$209,209. This represents the total estimated budget dedicated to Brine Line activities.

### **Staffing – JCSD**

As of June 30, 2023, the Pretreatment Program staff consists of 1 supervisor, 2 field inspectors and an environmental services coordinator for a total of 4 staff members. The JCSD Pretreatment Budget for FY 2022/23 was \$291,838 for the Brine Line Service Area. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

### **Staffing – SBMWD**

As of June 30, 2023, the Pretreatment Program staff consists of 1 manager, 1 lead inspector, 2 inspectors, 1 collection station operator, and 1 administrative support personnel for a total of 6 staff members. Total budget for the entire Pretreatment Program including the brine program for 2022/23 for staff and equipment was \$830,335. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

### **Staffing – Valley District**

As of June 30, 2023, the Pretreatment Program staff consists of 1 manager and 2 consultant provided personnel for a total of 3 staff members. The consulting budget for FY 2022/23 was \$75,873, which includes the sampling and monitoring costs. Valley District management time is estimated at approximately 15% of the program implementation budget, or \$11,381. The Agency does not track time to differentiate between Brine Line and non-Brine Line activities. Total cost for FY 2022/23 was approximately \$87,259.

### **Staffing SAWPA**

As of June 30, 2023, the Pretreatment Program staff consisted of 1 manager, and 1 specialist. An additional 0.6 FTE is contributed from 1 engineer, and 4 technical support personnel. The actual Brine Line Pretreatment Program activity expenditures for FY 2022/23 were \$960,720.

### **Staffing – Western Water**

As of June 30, 2023, the Pretreatment Program staff consists of 1 manager and 2 specialists for a total of 3 staff members. Estimated budget for FY 2022/23 was \$300,000 (this figure does not include sampling costs, which are assigned to the customer as a pass-through charge). The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

### **7.4.15 Equipment Inventory Listing**

The Summary of Pretreatment Equipment used by and available to SAWPA in Pretreatment Activities, such as field inspection and sampling activities, is provided in the following table. The quantities listed in each Member and Contract Agency column below represent the total resources available for Brine Line activities. The Member and Contract Agencies do not track time to differentiate between Brine Line and non-Brine Line activities or resource allocations. A summary of the pretreatment equipment used by the dischargers is shown in Appendix H titled “SAWPA Pretreatment Program Permittees with Pretreatment Equipment.”

<b>Table 7.6 Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2022/23</b> Santa Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division						
Equipment Description	Quantity					
	EMWD	IEUA	JCSD	SBMWD	SAWPA	Western Water
Vehicles	7	4	3	3	2	8
Automated Samplers	11	16	9	14	8	12
Handheld Portable Samplers	-	-	2	5	1	-
Sampler Batteries	24	40	18	23	5	5
Sampler Battery Chargers	12	18	2	4	1	2
Sampler Battery Power Packs	4	1	-	-	1	1
Portable Area/Velocity Flow Meters	6	5	5	-	-	-
Gas Meters/Detectors with Pumps	7	4	-	2	1	2
Laboratory Dishwashers	-	1	1	-	-	-
Ice Machines	1	1	2	1	1	3
Portable pH Meters	6	8	4	6	1	2
Sulfide Test Kits	1	7	1	2	1	1
SONDE Trunk Line Monitoring Devices	-	4	-	-	-	-
Laptop Computers	6	4	2	2	2	3
Continuous H <sub>2</sub> S Trunkline Monitoring Devices	-	7	-	-	-	-
Spill Response Kits	-	5	-	3	-	1

#### 7.4.16 SAWPA Pretreatment Program Training

SAWPA, Beaumont, EMWD, IEUA, JCSD, SBMWD, Valley District, Western Water and YVWD staff attended training classes and workshops presented by the California Water Environment Association (CWEA), including the P3S conference, and Southern California Alliance of Publicly Owned Treatment Works (SCAP) pretreatment committee meetings.

Interagency training was conducted each quarter throughout the 2022/23 fiscal year to promote the continued growth of all agency inspectors. Inspectors from each agency accompany a different agency on an inspection each quarter to observe inspection practices, but also see new types of facilities, broadening each inspector's experience.

Additional training was conducted throughout the 2022/23 fiscal year by SAWPA for member/Contract Agencies. The following training classes were conducted with all SAWPA agencies represented:

- SAWPA Facility Shutdown and Reporting Notification Training – July 21, 2022
- SAWPA Annual OERP Refresher Training – January 9, 2023
- SAWPA iPACS Reporting Refresher Training – May 18, 2023

## Chapter 8. Solids Management Program

### 8.1 Introduction

This section provides an overview of OC San’s Biosolids Program, focusing on biosolids quality with respect to metals. Biosolids are nutrient-rich, treated organic matter recovered through the treatment of wastewater. These solids are considered a resource because of their nutrient and energy values, and they are recyclable in part because of their low metal content. The pretreatment program is a key element in ensuring the recyclability of OC San’s biosolids by minimizing the discharge of heavy metals and other undesirable constituents into the collection system and ultimately the treated solids, which are used to fertilize farms.

OC San’s annual biosolids compliance report was completed, submitted to regulators, and posted online in February 2023. Visit [www.ocsan.gov/503](http://www.ocsan.gov/503) to access the most recent document that contains Biosolids Program information, regulations, quantities, policies, guiding principles, and how and where biosolids are recycled.

### 8.2 Biosolids Quality

Biosolids quality plays an important role in ensuring the continued recyclability of OC San’s biosolids. OC San’s pretreatment program has been extremely effective in reducing and maintaining levels of pollutants (e.g., OC San’s influent sewage meets drinking water standards for the biosolids monitoring metals). The ceiling concentrations and EQ concentrations promulgated by the US EPA’s biosolids regulations (40 CFR 503) are presented in Figure 8-1 through Figure 8-10 as a reference. For FY 2022/23, OC San biosolids met EQ limits for all the regulated parameters as shown in Table 8.1.

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
Arsenic	2012-13	41	0	7.8	4.7	2.0	10	7.0
	2013-14*		3.5	9.5	5.8	5.4	11	8.4
	2014-15		4.5	11	7.2	7.8	12	9.3
	2015-16*		6.3	12	8.3	6.2	12	9.2
	2016-17*		6.7	12	8.1	5.6	12	8.6
	2017-18*		7.2	16	9.9	7.9	16	11
	2018-19*		7.3	24	16	9.4	24	18
	2019-20*		1.3	8.8	5.4	1.3	12	5.5
	2020-21*		1.3	14	8.9	1.2	19	12
	2021-22		7.3	10.5	8.6	9.8	13.5	11
2022-23	7.1	10	8.8	8.2	14	11		
Cadmium	2012-13	39	2.6	7.8	4.7	1.9	4.4	3.1
	2013-14*		1.6	11	3.9	2.1	6.0	3.5
	2014-15		2.7	7.8	5.1	3.1	5.8	4.0
	2015-16*		1.3	4.7	2.5	2.0	4.5	3.0
	2016-17		2.6	3.1	2.3	2.0	3.8	3.0
	2017-18*		1.7	4.4	3.0	2.5	7.7	5.1
	2018-19*		1.2	3.0	1.6	2.7	8.4	4.2
	2019-20*		1.3	2.7	1.9	2.2	8.4	3.3
	2020-21*		0.9	1.6	1.3	1.6	2.5	2.0
	2021-22		0.6	1.5	1.1	1.1	1.4	1.3
2022-23	0.7	4.6	1.9	0.6	4.9	1.7		
Chromium	2012-13	**	42	56	49	42	59	49
	2013-14		39	52	45	40	53	46
	2014-15		30	51	40	34	70	46

**Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2022/23, in Milligrams per Dry Kilogram**  
Orange County Sanitation District, Resource Protection Division

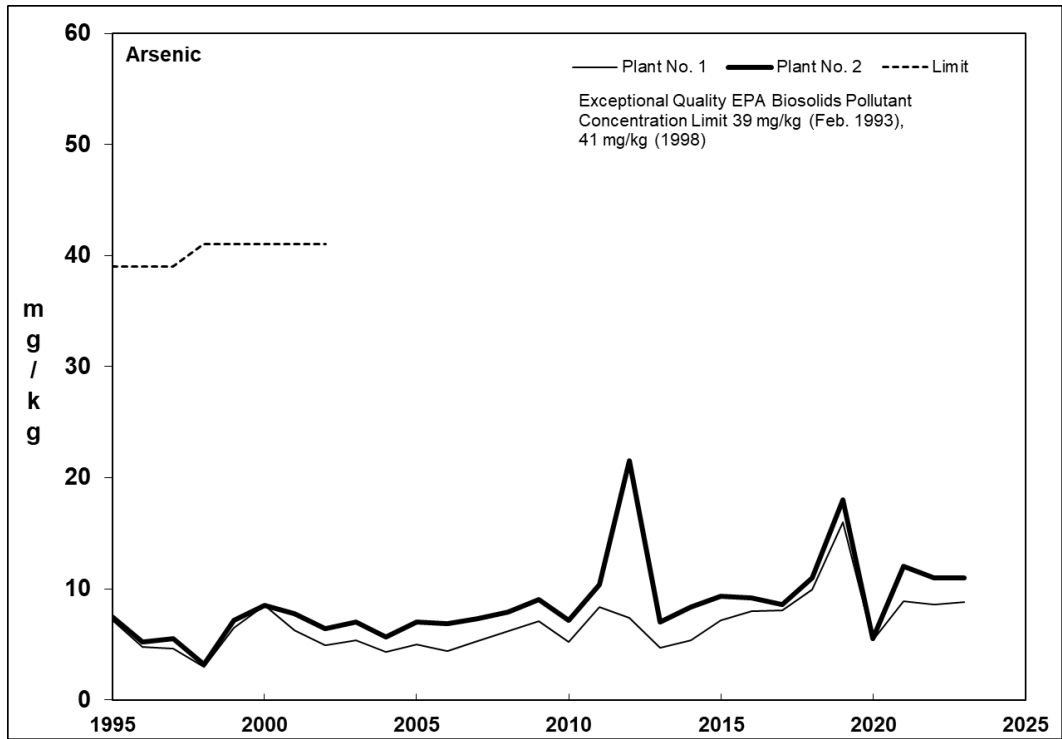
Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
	2015-16		31	89	46	28	60	46
	2016-17		30	89	49	29	67	46
	2017-18		27	38	34	38	54	44
	2018-19		29	58	39	32	53	45
	2019-20		37	51	45	35	49	42
	2020-21		43	54	48	42	65	51
	2021-22		34	49	41	41	52	45
	2022-23		34	42	37	34	51	42
Copper	2012-13	1,500	480	640	540	500	640	540
	2013-14		460	540	510	470	540	500
	2014-15		320	570	470	320	560	470
	2015-16		380	560	460	340	570	480
	2016-17		400	560	460	340	570	490
	2017-18		320	500	420	380	590	460
	2018-19		355	600	470	335	665	510
	2019-20		440	600	530	410	590	490
	2020-21		470	660	530	420	520	460
	2021-22		425	550	490	320	440	370
2022-23	385	500	450	305	375	340		
Lead	2012-13	300	7.5	19	15	7.5	17	14
	2013-14*		13	18	14	13	17	14
	2014-15*		8.7	15	13	9.0	17	13
	2015-16*		8.3	20	12	8.0	17	13
	2016-17*		7.9	20	11	7.5	17	12
	2017-18*		8.9	19	12	10	16	13
	2018-19		9.9	15	12	10	15	13
	2019-20		9.8	14	12	14	24	17
	2020-21		2.2	15	6.8	2.7	18	7.5
	2021-22		4.9	8.1	6.2	2.7	7.4	4.6
2022-23	2.7	11	6.4	0.8	11	4.7		
Mercury	2012-13	17	0.7	4.1	1.5	0.8	3.8	1.4
	2013-14		0.8	1.2	1.0	0.7	2.8	1.4
	2014-15		1.0	1.5	1.1	1.0	1.5	1.0
	2015-16		0.6	1.7	0.9	0.6	1.2	1.0
	2016-17		0.5	1.7	0.9	0.7	1.2	0.9
	2017-18		0.7	1.1	0.9	0.3	1.1	0.8
	2018-19		0.6	1.1	0.9	0.6	1.0	0.8
	2019-20		0.5	1.2	0.8	0.5	0.8	0.6
	2020-21		0.5	1.0	0.7	0.4	0.9	0.6
	2021-22		0.5	0.8	0.6	0.4	1	0.5
2022-23	0.5	0.9	0.7	0.4	0.7	0.5		
Molybdenum	2012-13	**	9.8	20	14	12	20	15
	2013-14		12	18	15	14	18	15
	2014-15		9.4	18	15	12	20	16
	2015-16*		11	18	15	11	23	16
	2016-17		12	18	15	11	23	16
	2017-18*		10	16	14	13	18	15
	2018-19		13	20	16	15	22	18



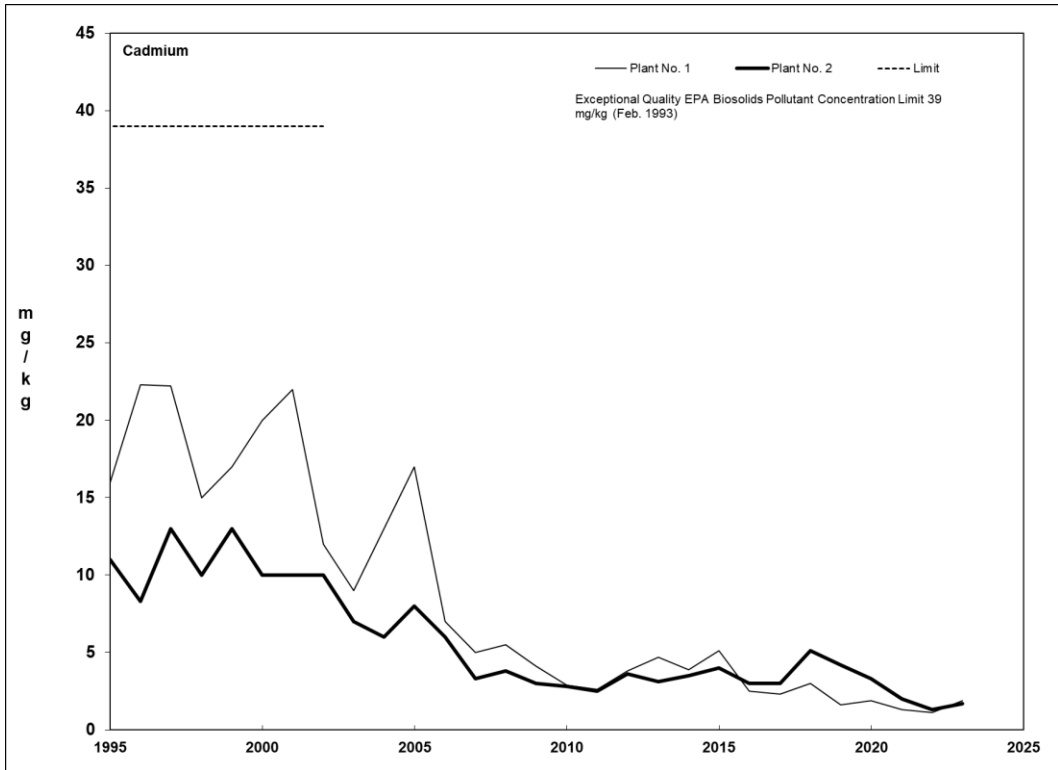
**Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2022/23, in Milligrams per Dry Kilogram**  
Orange County Sanitation District, Resource Protection Division

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
	2019-20		14	22	18	14	24	18
	2020-21		15	21	18	17	23	20
	2021-22		13	20	16	14	21	18
	2022-23		14	23	17	15	30	19
Nickel	2012-13	420	34	48	40	23	41	30
	2013-14		36	55	43	28	56	37
	2014-15		26	47	37	26	41	34
	2015-16*		29	45	38	20	41	33
	2016-17		25	45	36	21	41	32
	2017-18		28	37	32	31	39	34
	2018-19		23	44	33	29	44	37
	2019-20		27	41	35	26	46	35
	2020-21		28	46	36	26	33	29
	2021-22		23	33	28	25	30	26
2022-23	27	36	31	23	30	25		
Selenium	2012-13	100	0	20	9.0	0	20	8.0
	2013-14*		3.5	13	7.9	4.2	13	8.3
	2014-15*		4.1	13	7.1	4.5	15	7.3
	2015-16*		4.4	11	8.1	3.7	10	7.6
	2016-17*		4.1	10	8.4	4.8	10	8.0
	2017-18*		3.0	7.8	4.9	2.7	8.0	4.9
	2018-19*		2.5	48	6.6	2.3	2.9	2.7
	2019-20*		0.9	12	3.7	0.9	12	3.5
	2020-21*		1.0	12	6.5	0.9	10	6.3
	2021-22		6.7	9.3	8.0	7.5	11	9.2
2022-23	5.7	11	8.4	4.5	11	8.3		
Silver	2012-13	**	6.2	14	8.6	6.4	13	8.6
	2013-14*		2.9	7.6	5.3	3.6	9.1	6.3
	2014-15*		3.3	7.8	5.8	3.4	8.6	6.5
	2015-16*		2.4	7.7	5.6	2.5	7.9	5.6
	2016-17*		2.7	5.6	4.4	2.5	6.8	4.9
	2017-18*		3.2	5.1	3.9	3.7	5.0	4.2
	2018-19*		2.9	5.1	4.0	3.5	5.8	4.3
	2019-20*		3.0	5.0	4.0	2.7	5.8	4.0
	2020-21*		2.6	3.8	3.3	2.5	3.2	2.7
	2021-22		2.1	3.6	2.6	1.4	2.5	1.9
2022-23	2.3	3.5	2.9	1.2	2.5	1.8		
Zinc	2012-13	2,800	640	860	720	680	880	770
	2013-14		590	730	670	620	750	700
	2014-15		420	720	620	470	740	670
	2015-16		500	770	620	520	890	730
	2016-17		550	770	610	520	890	740
	2017-18		470	680	600	590	910	720
	2018-19		520	810	600	500	790	720
	2019-20		640	810	760	590	890	720
	2020-21		710	875	800	680	780	740
	2021-22		675	835	790	655	745	690
2022-23	665	850	760	580	770	660		

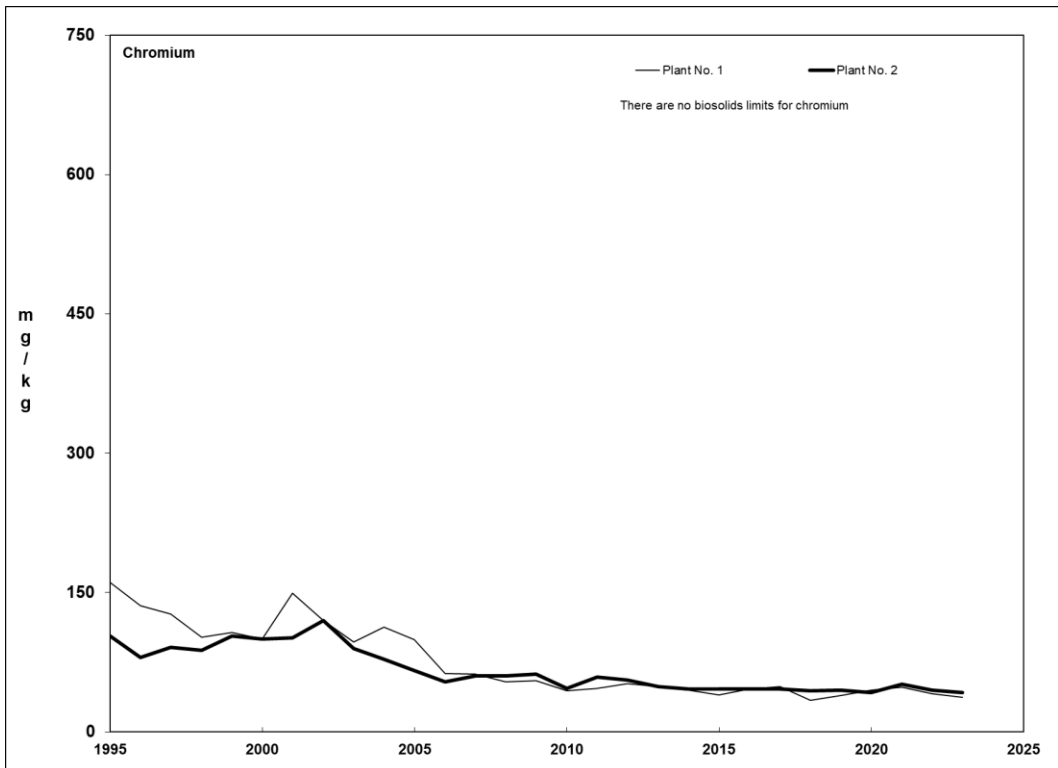
Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2022/23, in Milligrams per Dry Kilogram Orange County Sanitation District, Resource Protection Division									
Metal	FY	EQ Limit	Plant 1			Plant 2			
			Min	Max	Avg	Min	Max	Avg	
ND	Non-detect								
*	Calculations included data below the reporting limit, but above the method detection limit, and were therefore flagged as "detected not quantified" or the method detection limit was substituted for non-detect values.								
**	US EPA's extensive health risk analysis determined that no limits were needed for these metals (EPA 40 CFR 503).								



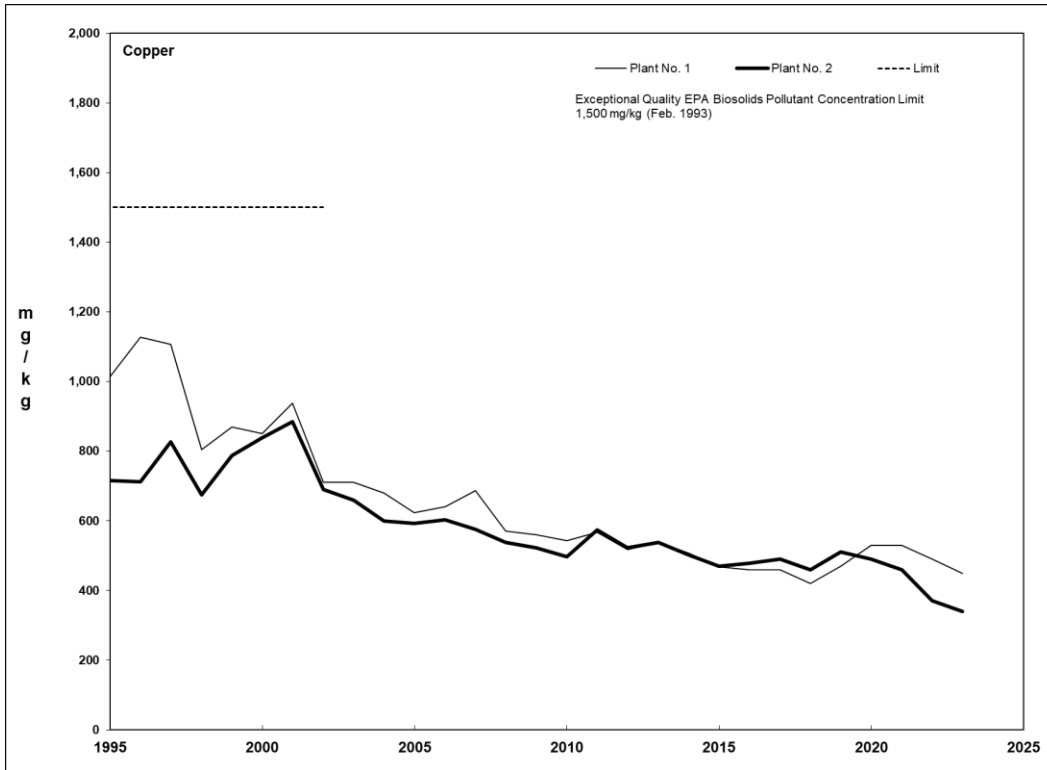
**Figure 8-1 Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



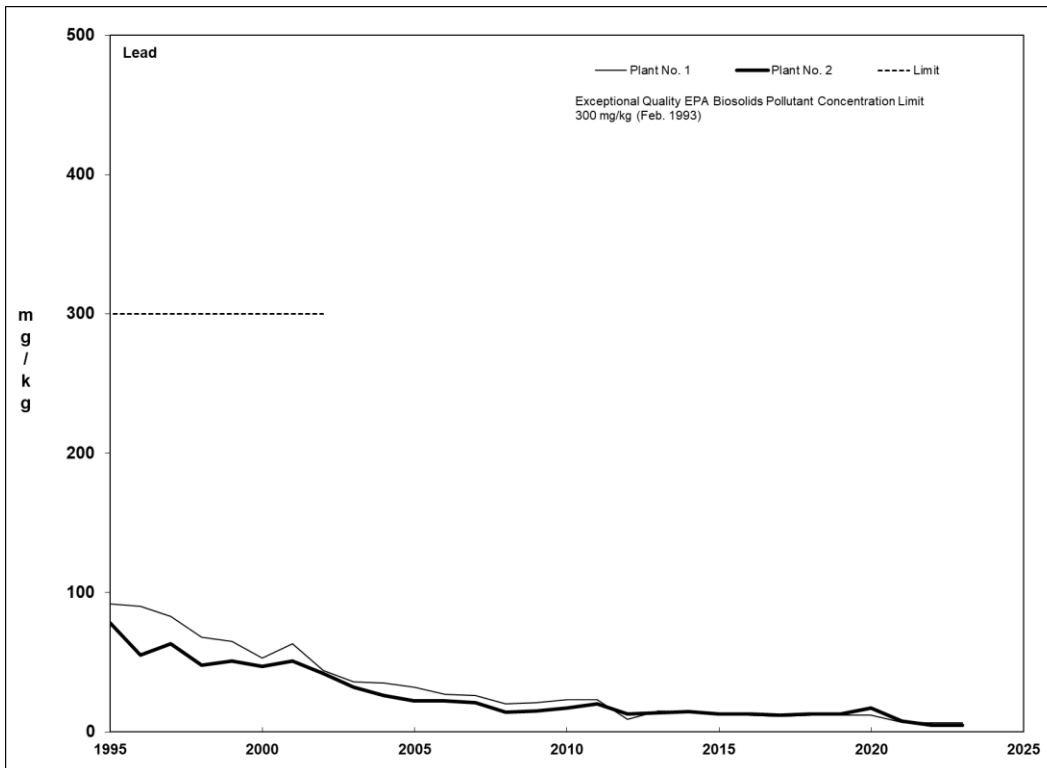
**Figure 8-2 Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



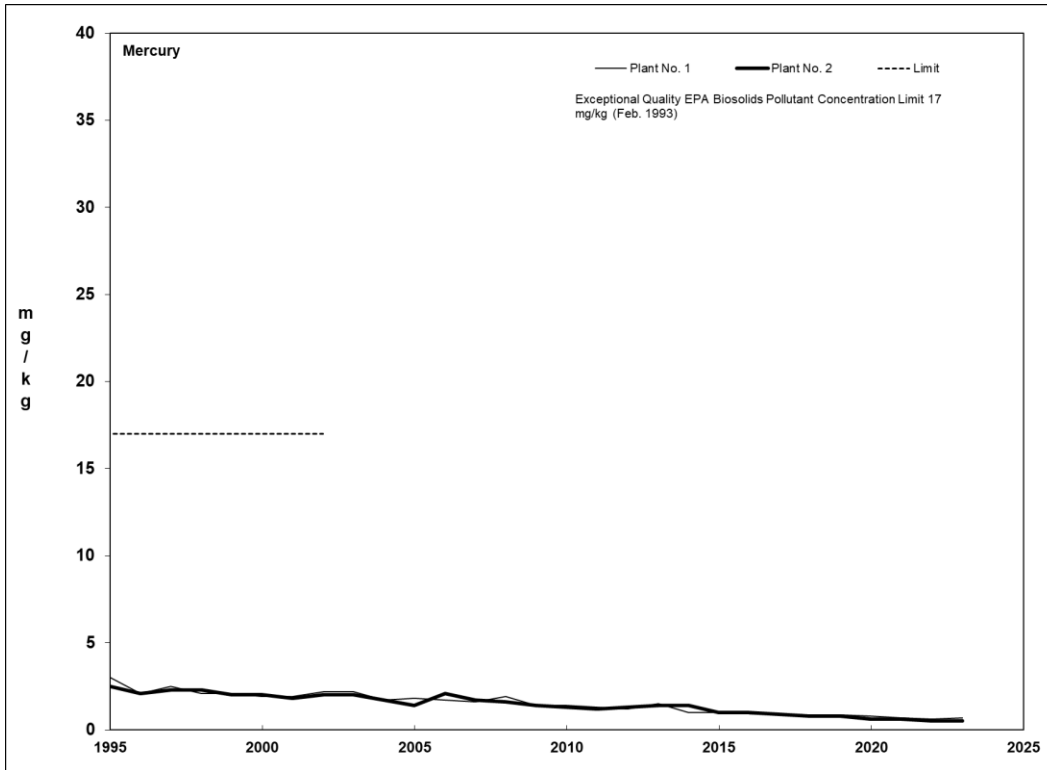
**Figure 8-3 Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



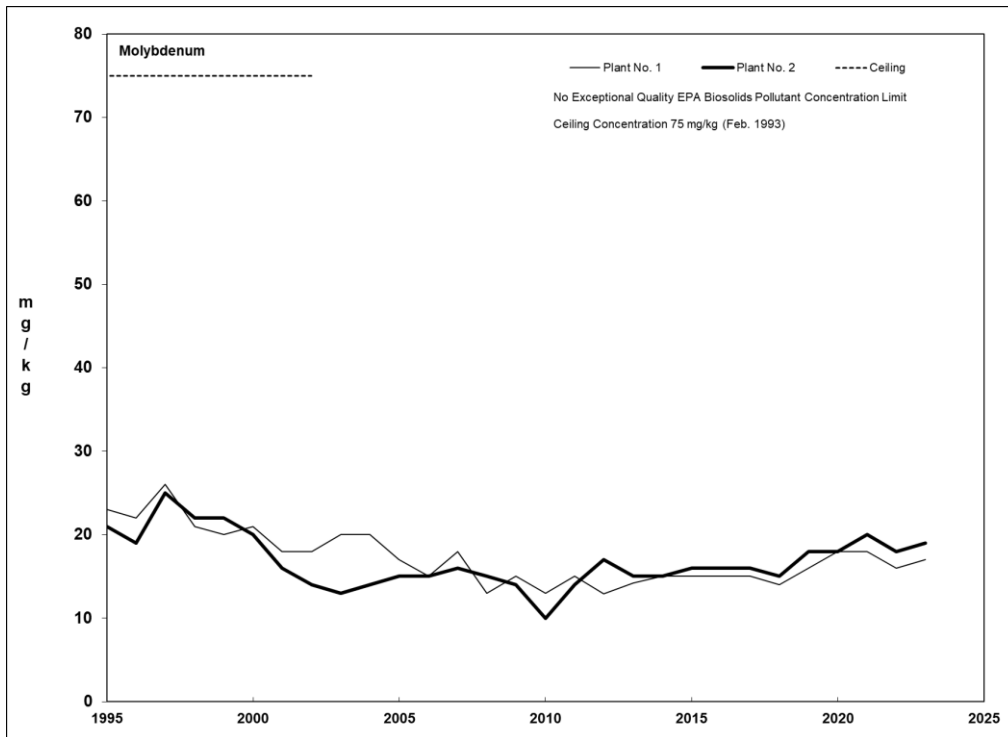
**Figure 8-4 Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2022/23**  
 Orange County Sanitation District, Resource Protection Division



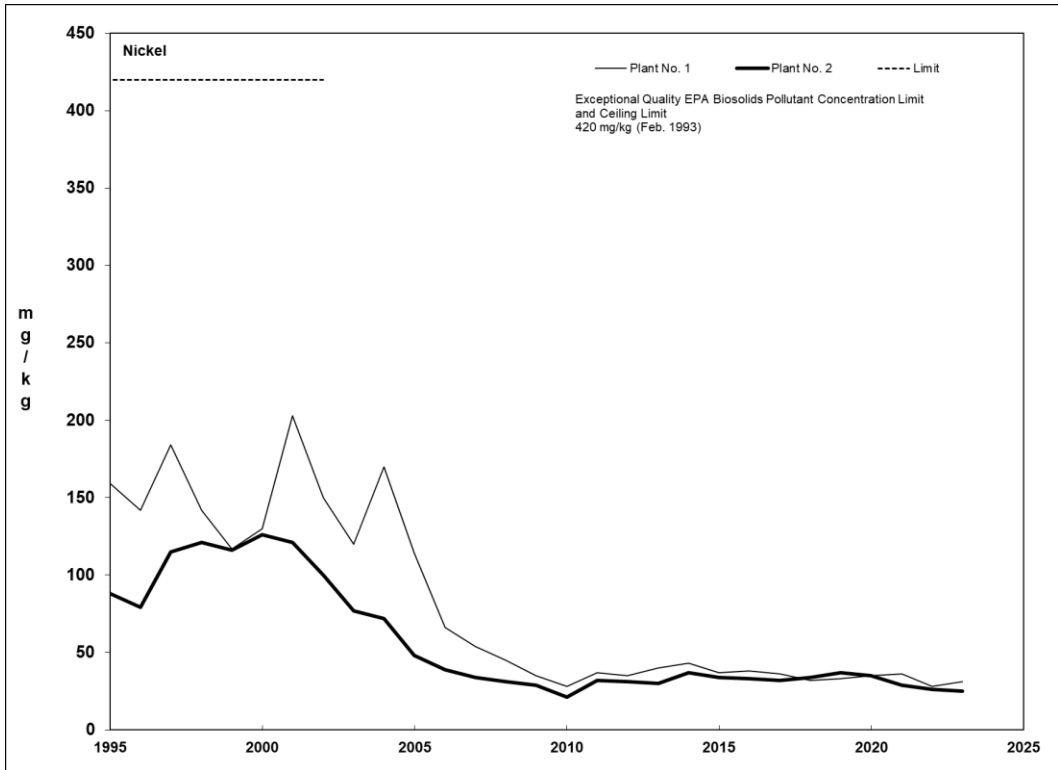
**Figure 8-5 Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2022/23**  
 Orange County Sanitation District, Resource Protection Division



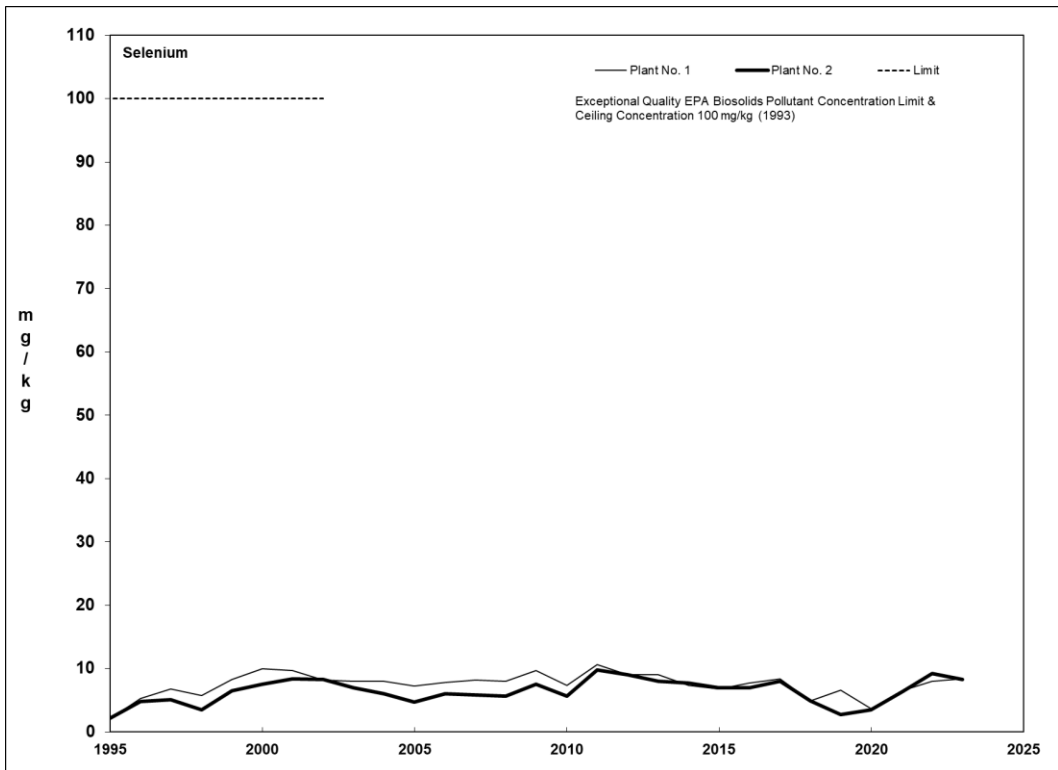
**Figure 8-6 Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



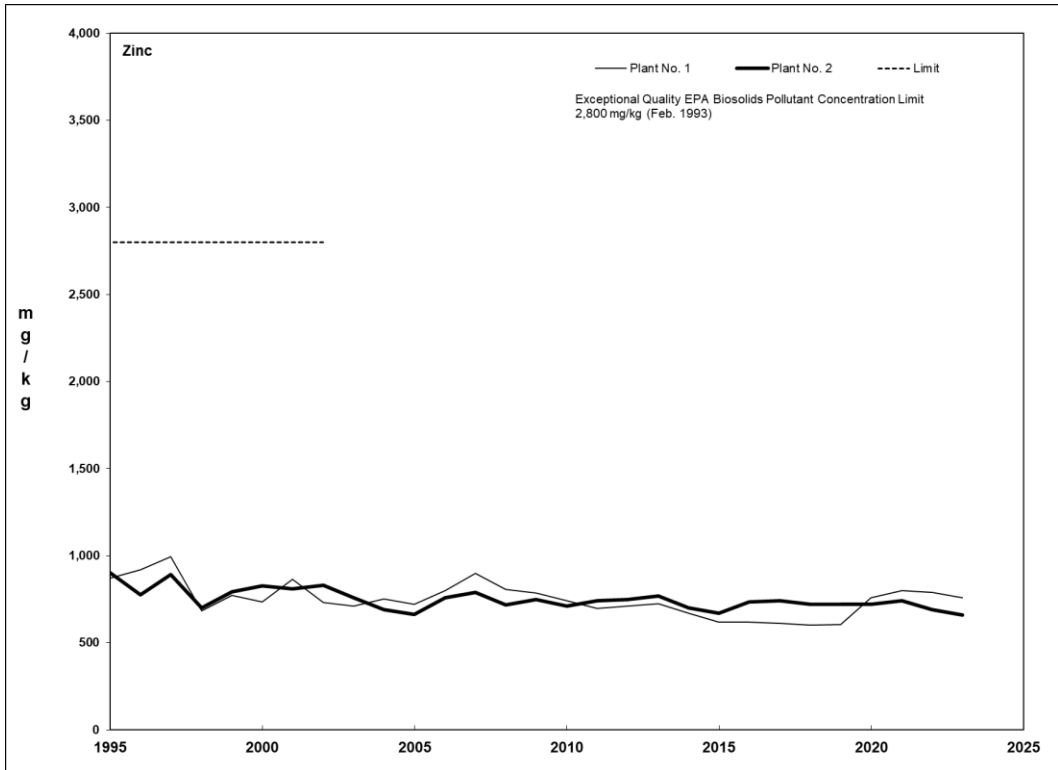
**Figure 8-7 Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



**Figure 8-8 Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



**Figure 8-9 Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2022/23**  
Orange County Sanitation District, Resource Protection Division



**Figure 8-10 Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2022/23**  
 Orange County Sanitation District, Resource Protection Division

## Chapter 9. Non-Industrial Source Control and Public Education Programs

### 9.1 Introduction

OC San's approved Pretreatment Program was designed to address conventional pollutants which may impact OC San and its collection system, treatment works, workers, and compliance with its permits. The program also ensures that OC San can successfully implement its reuse initiatives, which had primarily included biosolids land application and some water reclamation through OCWD's Interim Water Factory 21. Since the early 2000s, OC San became involved with new programs, such as the Dry Weather Urban Runoff Diversion Program to assist Municipal Separate Storm Sewer System (MS4) permittees in helping keep our oceans clean and open for the public to use safely. OC San also continued its partnership with OCWD and replaced the Interim Water Factory 21 with the Groundwater Replenishment System (GWRS), which started producing nearly 70 MGD of reclaimed water a day starting in 2008. As a result of these new programs and more stringent requirements and regulations, OC San expanded the Pretreatment Program to also address non-industrial sources and nonconventional pollutants of concern. The expansion resulted in the formation of the Non-industrial Source Control (NISC) Group as a part of the Pretreatment Program. Over time, the NISC Group implemented projects and initiated programs to address emerging concerns or issues. Based on the program's goals and timing, the projects were incorporated into other parts of OC San's existing operations or were terminated when the need had been addressed. The current, active NISC programs are listed in Table 9.1.

<b>Table 9.1 Non-Industrial Source Control Programs, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division	
<b>Programs</b>	
	Fats, Oils and Grease Control
	Radiator Repair Shops
	Dry Cleaners
	Dry Weather Urban Runoff Diversions
	Dental Amalgam

### 9.2 Fats, Oils, and Grease (FOG) Control Program

#### 9.2.1 Fats, Oils, and Grease Control

##### Background

A frequent cause of sanitary sewer overflows (SSOs) is grease accumulation in the small- to medium-sized sewer lines typically owned and operated by cities and local sewerage agencies. In April 2002, the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) issued Order No. R8-2002-0014, General Waste Discharge Requirements (WDR), which required Orange County cities and sewerage agencies, known as WDR Co-Permittees, to monitor and control SSOs. Specifically, the order required WDR Co-Permittees to develop a Sewer System Management Plan (SSMP), one element of which was a Fats, Oils, and Grease Control Program (FOG Control Program). On November 17, 2004, OC San passed FOG Ordinance No. OCSD-25 establishing the legal authority to prohibit food service establishments (FSEs) from discharging FOG to the sewer system. OC San implemented its FOG Control Program for FSEs in its direct service area starting January 1, 2005.

In May 2006, the State Water Resources Control Board (SWRCB) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003 (Statewide WDR), which required a similar effort statewide. In December 2006, the SARWQCB rescinded its WDR in lieu of the Statewide WDR. OC San submitted its SSMP to the SWRCB in May 2009. On December 6, 2022, Order WQ 2022-0103-DWQ was issued, superseding the previous State Water Resources Control Board Order 2006-0003-DWQ. OC San completed its most recent audit of the SSMP in May 2021, and is



due for its next audit in May 2024. More specifics on the county-wide FOG program can be found in Chapter VIII of the SSMP. The following sections detail OC San's FOG control efforts in FY 2022/23.

### Program Administration

The commercial FOG Control Program is administered through a combination of permitting, inspection, compliance tracking, report monitoring, and enforcement. The main elements of the FOG Control Program include:

1. Ordinance No. OCSD-25 – Fats, Oils, and Grease Ordinance for Food Service Establishments,
2. FOG Wastewater Discharge Permits to define and communicate permittees' responsibilities regarding FOG discharges,
3. Required Best Management Practices (BMPs) to minimize FOG-bearing wastewater discharges,
4. Installation and/or required maintenance of grease interceptors (GIs) when applicable,
5. Semi-annual monitoring of BMP implementation and GI maintenance,
6. Screening and evaluation of all inspection and monitoring reports to identify violations and/or deficiencies,
7. Inspection of FSE facilities to verify compliance, and
8. Enforcement Response Plan to respond to violations in a consistent and timely manner.

### Permitting

OC San conducted an examination of the FOG trouble spots, as well as an inspection of the FSEs in the service area to collect operational information. A scheme was developed to categorize the distinct types of facilities based upon their potential to discharge FOG, the need to enforce the regulatory requirements of the FOG Ordinance, and the potential of each FSE to impact known or potential trouble spots. Using the combination of inspection data and trouble spot information, FSEs were categorized into the following six groups:

- Category 1: FSEs with a GI installed.
- Category 2: FSEs without a GI installed, that are a significant contributor to a FOG trouble spot, and probably need to install a GI due to their FOG impact to the sewer.
- Category 3: FSEs without a GI installed, that are considered a less significant contributor to a FOG trouble spot but may still need to install a GI in the future due to their proximity to a trouble spot.
- Category 4: FSEs without a GI installed, that are not considered a significant contributor of FOG, are not upstream of a trouble spot, and probably will not need a GI installed.
- Category 5: FSEs found to be an insignificant source of FOG that will not be required to have a permit.
- Category 6: Commercial property owners that maintain a GI common to multiple FSEs.

After creating the six categories and examining the FSEs' operations and discharge configurations, different FOG Wastewater Discharge Permit (permit) alternatives were needed to cover the various conditions encountered. The six categories eventually produced three permit variations. Type 1 covers FSEs that have FOG pretreatment, typically considered to be a below-ground GI. Type 2 is issued to FSEs without pretreatment, i.e., Categories 2, 3, and 4. Type 2 permits include a conditional waiver from the FOG pretreatment requirement, as mandated for all FSEs by OC San's FOG Ordinance. The third permit variation, Type 6, was developed for the strip mall or food court owners who have several FSEs plumbed to a common GI. Type 6 permits only require GI maintenance and do not include any BMP requirements.

The individual FSEs connected to the common interceptor at a Type 6 location are still issued a Type 2 permit that requires BMP implementation.

Permits are currently issued for two-year terms. Prior to permit renewal, the FSE is required to complete and submit an updated permit application and pay the permit application fee. Ownership changes also trigger the issuance of a new permit as the permit is non-transferrable. During FY 2022/23 OC San managed thirty-eight (38) FOG permits with one (1) permittee going out of business, one (1) permittee undergoing a change in ownership and one (1) permittee undergoing a name change during the fiscal year.

Self-Monitoring Report

As a condition of the FOG permits, FSEs are required to implement BMPs; maintain their GIs, if applicable; keep records/logs of employee training and yellow grease disposal; and submit periodic self-monitoring reports to inform OC San of their BMP efforts and GI maintenance activities. Submitted reports are evaluated and used to determine compliance.

Inspection

Regular FSE inspections are an integral and essential part of the FOG Program, because they serve as a regulatory reminder to implement the required BMPs, and for FSEs with no GIs to maintain their FOG pretreatment devices. Every inspection presents an opportunity to provide educational outreach to the FSE community by further reinforcing the importance of the kitchen BMPs and strengthening the cooperative effort ultimately needed to effectively control FOG discharges to the sewer. The FOG program includes two distinct types of inspections, 1) a kitchen BMP inspection conducted by the Orange County Health Care Agency (OCHCA), and 2) a compliance inspection conducted by OC San staff. The verification that GIs are periodically pumped out and in compliance with the Twenty-five Percent (25%) rule (total depth of the floating grease layer plus the settleable solids layer shall not exceed 25% of the total liquid depth of the GI) is primarily accomplished through the *Semi-Annual GI Wastehauling Report* submittals.

Compliance

Violation of a permit requirement or provision of the FOG Ordinance, or the failure to submit a required report can lead to issuance of a CAN. The CAN is followed by an NOV which includes the assessment of noncompliance fees if the deficiency is not corrected in a timely manner.

FOG Program Effectiveness

Monitoring the effectiveness of the FOG program enables OC San to refine its program implementation as necessary to comply with its requirement to eliminate preventable SSOs. OC San uses a GIS to analyze the relationship between trouble spots, FSEs, and SSOs. Areas of concern are evaluated and prioritized based on the impact of FSE proximity, tributary residential density, and FOG accumulation in the sewer line, as determined by both CCTV and field crew observations. OC San coordinates with the Operations and Maintenance staff to maintain an effective commercial FOG program by keeping trouble spots under surveillance and following up on grease accumulations before they reach a critical stage. Table 9.2 summarizes the SSO data from the past two reporting periods. This data demonstrates the effectiveness of the FOG program at reducing the frequency of SSO events.

<b>Table 9.2 FOG Program Effectiveness, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division		
<b>Spills</b>	<b>FY 2021/22</b>	<b>FY 2022/23</b>
OC San system spills attributable to FSE FOG	0	0
OC San system spills attributable to residential FOG	0	0
Private lateral spills attributable to FOG	0	0
Total FOG-related spills	0	0

### **9.2.2 John Wayne Airport FSEs**

John Wayne Airport (JWA), a commercial and general aviation airport owned and operated by the County of Orange, houses approximately eight FSEs that feed into six existing grease interceptors. In April 2022, OC San was contacted by a JWA consultant inquiring about the preferred sizing method of grease interceptors, because JWA was considering additional FSEs. This inquiry precipitated an investigation regarding FOG Program jurisdiction, because FOG Program responsibility is tied to the local sewer service provider, and OC San was unaware which agency's collection system the potential FSEs would connect to for local sewer service.

After OC San staff invested considerable staff time to locate and review records and agreements that spanned over three decades, grease interceptor data located on the Orange County GIS Open Data Portal indicated none of the John Wayne Airport FSEs were directly connected to OC San's regional sewers, therefore OC San had no FOG Control Program jurisdiction over the John Wayne Airport.

### **9.3 Radiator Shops**

The Radiator Repair Shop Certification Program aims to prevent heavy metal-bearing liquids, oil and grease, spent antifreeze/coolant, as well as any other hazardous wastes from being discharged to the sewer. The program requires shops that rebuild and repair radiators to biennially certify the following:

- No industrial wastewater or spent antifreeze/coolant is discharged to the sewers,
- Floor drains are permanently sealed and secured from spills or accidental discharges,
- Water recycling systems are close-looped with no connection to the sewer, and
- Wastehauling records are maintained onsite and available for review upon request.

The Radiator Certification Program for FY 2022/23 contained ten (10) radiator shops. Existing radiator repair shops will be required to recertify in the Fall 2023. As part of OC San's ongoing Industrial Waste Survey activities, as new radiator repair shops are identified, they will be evaluated for incorporation into the certification program. During FY 2022/23 no new radiator shops were identified.

### **9.4 Dry Cleaners**

Initially implemented to prevent soil and groundwater contamination by perchloroethylene (PERC), the Dry Cleaner Certification Program was revitalized as an important outreach tool to help protect the GWRS. The program tracks the solvent usage and facility ownership within the dry cleaner community to prevent the discharge of solvent-containing wastes from dry cleaning operations. Rather than just examining the spent solvent disposal, additional emphasis is placed on the contaminated water from the solvent/water separator, which is typically managed by either wastehauling offsite or by performing onsite evaporation. The program requires dry cleaning establishments to certify annually the following:

1. No waste solvent is discharged to the sewer,
2. Dry cleaning machines and auxiliary equipment are not connected to the sewer,
3. Floor drains are secured from spills and accidental discharges,
4. Solvent waste is wastehauled for offsite disposal in accordance with all applicable laws, and
5. Solvent-contaminated separator water is wastehauled and/or evaporated.

Certification forms are mailed to every dry-cleaning facility at the beginning of the annual cycle. After the completed certifications are returned, audit inspections are conducted to verify the information. Dry cleaning facilities must maintain their wastehauling records onsite and make them available for review during inspection. Although all active facilities and garment collection facilities with equipment onsite receive a certification form, only PERC users are routinely inspected by OC San. At the end of FY 2021/22, there were a total of two hundred forty-eight (248) dry cleaning facilities in the OC San Dry Cleaner Certification Program, of which 40 were known as of the last oversight inspections to have been using PERC onsite.

During the FY 2020/21 certification cycle, OC San deferred PERC facility inspections because as of January 1, 2021, all PERC dry cleaning systems within the South Coast Air Quality Management District (SCAQMD) were to have been removed from service by physically removing the machine or by disconnecting utilities (electric, steam lines) to the machine and draining all PERC from the machine tanks. Despite the regulatory deadline, SCAQMD offered dry cleaning facilities an opportunity to request a hardship variance. Several facilities in OC San's service area were granted a variance with the last permissible onsite use extended until June 2021.

In FY 2021/22, once SCAQMD's variance period ended, with anticipation that reasonable potential for PERC discharge from the drycleaners would no longer exist, OC San commenced program closure inspections at the certification program's 40 known PERC dry cleaning facilities. In February and March 2022 OC San conducted closure inspections and found six required follow-up inspections to confirm initial observations. Additionally, one new facility was identified and inspected based on information collected during the oversight inspections. Additional follow-up inspections found one facility continued to have PERC onsite. On October 20, 2022, OC San referred this drycleaner to the SCAQMD enforcement branch. Although SCAQMD proceeded through its enforcement response plan, OC San continued to conduct onsite inspections throughout FY 2022/23 which continued to show PERC use onsite. As of March 22, 2023, OC San was able to verify that the facility was no longer using PERC and was closing down. In the next fiscal year, OC San intends to close the Dry Cleaner Certification program following notice to the Santa Ana Regional Water Quality Control Board of this non-substantial program change [40 CFR 403.18(d)].

## **9.5 Dry Weather Urban Runoff Diversions**

OC San accepts the diversion of Dry Weather Urban Runoff to the sewer to assist MS4 permittees address various public health and environmental issues which are difficult to control through traditional stormwater BMPs. Urban runoff is water that is generated by daily activities such as lawn irrigation, hosing down sidewalks, and car washing. As the water flows across the urban landscapes and through the storm drain system, the water may become contaminated with nutrients, pesticides, heavy metals, toxic chemicals, bacteria, and viruses. Once the contaminated water reaches our creeks, rivers, and shoreline, the pollutants may harm wildlife and native vegetation, spoil recreational opportunities, and even cause human illness through contact with recreational waters.

Investigation into the bacterial contamination along the Huntington Beach shoreline in 1999 suggested that Dry Weather Urban Runoff flowing into the ocean from the surrounding watersheds may have caused or contributed to the resulting beach closures. Recognizing that Orange County beaches were being affected by pollution carried by urban runoff and willing to assist MS4 permittees during dry weather, the OC San Board of Directors adopted a series of resolutions agreeing to accept a limited, controlled amount of Dry Weather Urban Runoff into the sewer system. Resolution No. 01-07, adopted March 28, 2001, declared that OC San will initially waive fees and charges associated with authorized discharges of Dry Weather Urban Runoff to the sewer system until the total volume of all runoff discharges exceeded four MGD calculated on a monthly average. In June 2002, Assembly Bill 1892 amended OC San's charter to formally allow the diversion and management of Dry Weather Urban Runoff flows. For the first 12 years of the Dry Weather Urban Runoff Diversion Program, the average monthly flow averages remained below the four MGD threshold, thus avoiding user fees for treatment and disposal costs being assessed to the diversion permittees. In 2012, OC San received several diversion proposals to deal with bacteria, nitrogen, and selenium loading to the Upper Newport Bay. The average daily discharge volume from the additional proposed diversions combined with the existing diversion flows would eventually exceed the four MGD fee threshold.

On June 12, 2013, the Board of Directors adopted Urban Runoff Resolution No. 13-09 to expand the waiver of fees or charges on the treatment of Dry Weather Urban Runoff from four MGD to 10 MGD with "dry weather" defined as periods when no measurable rainfall occurs in any portion of OC San's service area and exclusive of the cessation period following the rainfall during periods when OC San's collection, treatment, and disposal facilities would be impacted by the flows. This policy change provided a vehicle for additional Dry Weather Urban Runoff discharge to the sanitary sewer which might assist the MS4 permittees addressing environmental problems caused by Dry Weather Urban Runoff, such as contaminant loading in the Upper Newport Bay Watershed. The latest resolution's adoption once again demonstrated

OC San's commitment to protecting public health and the environment. Under Resolution 13-09, the MS4 permittees are authorized to divert a maximum of 10 MGD for all permitted Dry Weather Urban Runoff combined.

The County of Orange is the principal permittee that coordinates the OCFCD and the regulated cities' efforts in implementing the Water Quality Management Plan required by the NPDES Permit for discharge of urban stormwater. Before a diversion is implemented, the proposed project is presented to the Orange County Stormwater Program Technical Advisory Committee (TAC). The committee evaluates the proposal, and if approved by the TAC, the TAC puts the diversion on its Dry Weather Diversion Priority List. This approval step ensures that OC San's Dry Weather Urban Runoff Diversion Program's limited capacity is effectively utilized to improve coastal water quality.

Once the TAC accepts a new diversion proposal, OC San initiates with the responsible entity an *Agreement for Dry Weather Urban Runoff Discharge* to govern sanitary sewer service to the diversion project. In some cases, the entity is a partnership of several responsible municipalities, special districts, and the County of Orange. The agreement cites the reasons that the discharge is being accepted and details the responsibilities of the entity, or agency, that will be maintaining and operating the diversion. The agreement stipulates that the quality and quantity of the Dry Weather Urban Runoff from the Drainage Area(s) represented in the agreement shall meet all terms, conditions, and discharge limits contained in OC San's Ordinance and board resolutions.

In addition to the adoption of an Agreement, discharge for treatment and disposal from each diversion structure is only permissible under the terms and conditions of a Dry Weather Urban Runoff discharge permit administered by the Resource Protection Division and the Dry Weather Urban Runoff Diversion Program. The permit establishes discharge limits, constituent monitoring, and flow metering installation and calibration requirements, water quality and quantity reporting requirements, and a specific prohibition for storm runoff (as discharge is only authorized during periods of dry weather).

#### **9.5.1 Dry Weather Diversion Systems and Urban Runoff Flow**

Currently, twenty (20) active Dry Weather Urban Runoff diversion structures are permitted, three (3) owned and operated by the County of Orange, eleven (11) owned and operated by the City of Huntington Beach (CHB), two (2) owned and operated by the City of Newport Beach (CNB), three (3) owned and operated by the Irvine Ranch Water District, and one (1) owned and operated by PH Finance, who is the present owner of the Pelican Hill Resort.

In September 2021, an Agreement was reached between OC San and CNB for two additional drainage basins. This new Agreement facilitates management and permitting for two additional diversions: Arches – Hoag and Arches – Old Newport Boulevard. Following receipt of permit applications and an onsite pre-permit inspection on June 8, 2023, OC San identified significant deficiencies with the facilities which must be remedied prior to permit issuance.

In January 2023, CHB proposed and received approval from the TAC to add an additional diversion (CHB's Heil Stormwater Pump Station) onto the Dry Weather Diversion Priority List. OC San is working with CHB to initiate a Dry Weather Urban Runoff Discharge Agreement and support the permit application process.

In April 2023 ahead of reaching Agreement with Orange County Flood Control District (OCFCD), OC San issued a Special Purpose Discharge permit to OCFCD for the Santa Ana – Delhi (SAD) diversion to perform intermittent operations and maintenance testing. In May 2023, a Dry Weather Urban Runoff Discharge Agreement for the SAD diversion was reached which will facilitate permitting and management of the SAD diversion under the Dry Weather Urban Runoff Diversion program. OC San anticipates receiving permit application materials from OCFCD in the next reporting period and intends to develop and issue a discharge permit upon receipt of a complete and responsive permit application.

Table 9.3 shows the range of monthly diversion discharges and the total discharge over the past six years.

<b>Table 9.3 Dry Weather Urban Runoff Discharges, FY 2016/17 – 2022/23</b> Orange County Sanitation District, Resource Protection Division		
<b>FY</b>	<b>Million Gallons Discharged</b>	<b>Monthly Average Flow Range (MGD)</b>
2016/17	369	0.18 – 1.58
2017/18	461	0.29 – 1.90
2018/19	337	0.28 – 1.56
2019/20	480	0.44 – 2.06
2020/21	565	1.38 – 3.07
2021/22	383	1.17 – 2.02
2022/23	390	0.41 – 2.31

The diversions cumulatively discharged 390 million gallons (MG) of Dry Weather Urban Runoff, with a normalized discharge of 1.55 MGD, and a monthly flow range between 0.41 and 2.31 MGD. The flow volume was similar to the previous fiscal year, which maintained the trend of decreasing flows from the diversions.

Flows for the 11 CHB diversions decreased 24 MG from FY 2021/22 totals (233 MG in FY 2022/23 compared to 257 MG in FY 2021/22). Total cumulative flow discharge for the three active Orange County Public Works (OCPW) diversions decreased 12 MG (23 MG in FY 2022/23 compared to 35 MG in FY 2021/22) from the previous year as the Greenville Channel diversion remained offline from July 2022 to April 2023 and the Huntington Beach Channel was shut down for repair from March 2023 to June 2023. Flow from the three IRWD diversions, Muddy Canyon, Los Trancos Canyon, and Peters Canyon, increased 44 MG overall (122 MG in FY 2022/23 compared to 78 MG in FY 2021/22) primarily due to an increase in discharge from the Peter's Canyon diversion from April 2023 to June 2023. The flow from the CNB diversions decreased 1.96 MG compared to the previous year (9.40 in FY 2022/23 compared to 11.36 MG in FY 2021/22), as the Big Canyon diversion ceased discharge in November 2021 and the Mid Big Canyon diversion was deactivated between from July 2022 through September 2022. The Pelican Point Diversion flow slightly increased compared to the previous totals (1.87 MG in FY 2022/23 compared to 1.78 MG in FY 2021/22).

Only three (3) of the twenty (20) diversions flow to Plant No. 1: the Santa Ana River Diversion, the Peters Canyon Diversion, and a portion of the Scenario Diversion. Due to the multiple paths that the Scenario flows can take to reach OC San's Plant No. 1 or Plant No. 2 simultaneously, it is not possible to accurately determine how much water from this diversion is available for the GWRS. The remaining eighteen (18) diversions are located closer to the coast, flow to Plant No. 2, and are currently available for reclamation after the commencement of GWRS Final Expansion. The Santa Ana River and Peters Canyon Diversions discharged a total of 60 MG to Plant No. 1 in FY 2022/23, and the remaining eighteen diversions discharged 329 MG to Plant No. 2 in FY 2022/23. Total Dry Weather Urban Runoff flows diverted to the OC San's collection system in FY 2022/23 contributed nearly 32 MG per month to GWRS.

If current discharge trends continue, OC San expects to receive between 350 MG and 750 MG next fiscal year from the existing diversions. During the past 24 years, OC San treated over 11 billion gallons of Dry Weather Urban Runoff that would have otherwise flowed into the ocean without treatment. Since OC San's Dry Weather Urban Runoff Program began, total treatment and disposal cost associated with these flows has reached approximately \$14.3 million, based upon applicable industrial user fee rates over this period. Because the monthly average flow range remains under 10 MGD, OC San currently waives all fees and charges associated with authorized discharges of Dry Weather Urban Runoff.

Table 9.4 details the current diversion locations, trunkline/tributary destinations, and the average discharge volume of each individual location for this reporting period.

<b>Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division					
<b>No.</b>	<b>Diversion</b>	<b>Location</b>	<b>Trunkline</b>	<b>Tributary</b>	<b>Average Discharge* (MGD)<sup>1</sup></b>
<b><i>Owned and Managed by the City of Huntington Beach</i></b>					
1	Atlanta Diversion	8151 Atlanta Avenue	Coast (via Atlanta Interceptor)	Plant No. 2	0.189
2	Newland Diversion	8612 Hamilton Street	Coast (via Atlanta Interceptor)	Plant No. 2	0.304
3	Banning Diversion	2201 Malibu Lane	Miller-Holder	Plant No. 2	0.115
4	Hamilton Diversion	10101 Hamilton Avenue	Miller-Holder	Plant No. 2	0.098
5	Adams Diversion	19661 Chesapeake Lane	Miller-Holder	Plant No. 2	0.072
6	Indianapolis Diversion	9221 Indianapolis	Miller-Holder	Plant No. 2	0.055
7	Scenario Diversion	4742 Scenario Drive	Knott	Plant No.1 & No. 2 <sup>^</sup>	0.031
8	1 <sup>st</sup> Street CDS	103 Pacific Coast Hwy	Coast	Plant No. 2	0.011
9	Meredith Diversion	20192 Mainland Lane	Miller-Holder	Plant No. 2	0.022
10	Flounder Diversion	9731 Flounder Drive	Bushard	Plant No. 2	0.019
11	Yorktown Diversion	9211 Yorktown Avenue	Miller-Holder	Plant No. 2	0.012
<b><i>Owned and Managed by the County of Orange</i></b>					
12	Greenville-Banning Channel	2501 Placentia Avenue	Interplant	Plant No. 2	0.024
13	Huntington Beach Channel	8092 Adams Avenue	Coast (via Delaware)	Plant No. 2	0.038
14	Santa Ana River	10844 Ellis Avenue	Sunflower	Plant No. 1	0.025
<b><i>Owned and Managed by Irvine Ranch Water District</i></b>					
15	Los Trancos Diversion	Pacific Coast Highway (Crystal Cove State Park)	South Coast	Plant No. 2	0.183
16	Muddy Canyon Diversion	Pacific Coast Highway (El Moro State Park)	South Coast	Plant No. 2	0.089
17	Peters Canyon Diversion	3001 Main Street	Main Street	Plant No. 1	0.212
<b><i>Owned and Managed by the City of Newport Beach</i></b>					
18	Newport Dunes Diversion (Gravity Flow)	1131 Back Bay Drive	South Coast (via Back Bay)	Plant No. 2	0.004
19	Mid Big Canyon	1951 Jamboree Road	South Coast (via Back Bay)	Plant No. 2	0.036
<b><i>Owned and Managed by PH Finance, LLC</i></b>					
20	Pelican Point Diversion	36 Pelican Point Drive	South Coast	Plant No. 2	0.007
<b><i>Sum of the Average Daily Discharges (FY 2022/23)</i></b>					<b>1.547</b>

<b>Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) <sup>1</sup>
*Individual daily averages calculated using the formula: cumulative flow total for the year / number of discharge days. Note that number of discharge days = number of days in the discharge period – number of days the DWUR Program suspended due to wet weather.					
<sup>1</sup> MGD = million gallons per day					
^Scenario flows to Plant No. 1 and Plant No. 2 simultaneously due to Bushard-Ellis junction box.					
A. Mid Big Canyon: System offline Jul – Sep 2022					
B. Greenville: System offline Jul 2022 – Apr 2023					
C. Huntington Beach Channel: System offline Mar – Jun 2023					

Table 9.5 summarizes several significant Dry Weather Urban Runoff Program statistics.

<b>Table 9.5 Dry Weather Urban Runoff Diversion Program, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division	
Number of new permits generated	0 permit(s)
Number of permitted diversions	20 diversions
Total average daily discharge	1.55 MGD
Monthly average daily discharge range	0.41 – 2.31
Newly proposed diversions	4 diversions
Estimated combined discharge for proposed/pending diversions	2.1 MGD
Maximum combined Dry Weather Urban Runoff discharge allowance	10 MGD
*Resolution No. 13-09 accommodates 10 MGD of Dry Weather Urban Runoff without cost to permittees.	

### 9.5.2 Proposed Dry Weather Urban Runoff Diversion Systems

The CNB’s Arches Diversion project consists of two diversions near the intersection of Newport Boulevard and Pacific Coast Highway. The Arches Diversions are projected to discharge up to 0.1 MGD to OC San’s Plant No. 2. In FY 2022/23, OC San’s Resource Protection Division reviewed two rounds of Dry Weather Urban Runoff Discharge permit applications and conducted pre-permit inspections for the Arches diversions. OC San identified several deficiencies in the permit applications and during the pre-permit inspections. OC San is working to support CNB in permit application preparation.

In FY 2022/23, OC San issued a Special Purpose Discharge permit to the Orange County Flood Control District (OCFCD) for the Santa Ana – Delhi diversion to perform intermittent operations and maintenance testing. In parallel, a Dry Weather Urban Runoff Discharge Agreement for the Santa Ana – Delhi diversion was reached between OC San and OCFCD. OC San is working to support the County of Orange in Dry Weather Urban Runoff Discharge permit application preparation. The Santa Ana – Delhi Channel Diversion is projected to discharge up to 1.94 MGD to OC San’s Plant No. 1.

In FY 2019/20, OC San learned during meetings to address the Newport Bay TMDL issues that at least two new flood control channel diversions were being proposed: the Santa Isabel and East Costa Mesa Channel diversions. To date, OC San has not been approached to incorporate these diversions into an existing agreement or to develop and execute an additional agreement for the drainage basins these channels serve. In March 2022, CHB inquired about converting their existing Heil Stormwater Pump Station into a Dry Weather Urban Runoff Diversion facility, which was approved by the TAC as the most current addition in the Dry Weather Diversion Priority List. OC San is working with CHB to initiate a Dry Weather Urban Runoff Discharge Agreement and to support the permit application process.



In addition, continuing this past fiscal year, modifications to the Newport Dunes diversion remained under consideration; Although CNB provided OC San a rehabilitation proposal, the proposal was not accepted as presented and must be resubmitted in accordance with a Special Condition in the Dunes DWURD permit renewal issued February 2023.

### 9.5.3 Dry Weather Urban Runoff Quality

OC San requires self-monitoring of the Dry Weather Urban Runoff discharges and conducts semi-annual sampling and analysis to ensure discharge limit compliance for various regulated constituents. Overall, the monitoring of the Dry Weather Urban Runoff discharges shows very consistent compliance with OC San's local limits. Although OC San no longer has a local limit for TTOs since the adoption of Ordinance No. OCSD-48 in 2016, the Resource Protection Division continues to monitor for TTOs as a safety measure to screen for pollutants of concern.

Monitoring results for metal constituents were all within local discharge limits.

Table 9.6 summarizes the minimum and maximum concentrations detected in the Dry Weather Urban Runoff during the reporting period. OC San's latest instantaneous discharge limits are included for comparison.

<b>Table 9.6 Dry Weather Urban Runoff Compliance, FY 2022/23</b> Orange County Sanitation District, Resource Protection Division			
Constituent	Minimum Concentration Reported (mg/L)	Maximum Concentration Reported (mg/L)	Instantaneous Discharge Limit (mg/L)
Ammonia N	ND (< 0.076)	2.63	None
BOD	ND (< 2.236)	68	None
TSS	ND (0.7)	1080	None
Cadmium	ND ( $5.6 \times 10^{-5}$ )	0.093	1.0
Chromium	ND ( $1.49 \times 10^{-4}$ )	0.025	20.0
Copper	ND ( $1.3 \times 10^{-3}$ )	0.215	3.0
Lead	ND ( $1.6 \times 10^{-4}$ )	0.068	2.0
Molybdenum	ND ( $1.6 \times 10^{-3}$ )	0.243	2.3
Nickel	ND ( $7.7 \times 10^{-4}$ )	0.496	10.0
Selenium	ND ( $6.5 \times 10^{-4}$ )	0.0753	3.9
Zinc	ND (0.013)	0.811	10.0
Oil & Grease Min.	ND (0)	4.71	100.0
Pesticides	ND (0)	0	0.01

\*ND = not detectable (below analytical detection or reporting limits)  
mg/L = milligrams per liter

OC San's Dry Weather Urban Runoff Diversion Program continues its success in helping to maintain the quality of the receiving waters along the Orange County coastline. For a seventh year in a row, Orange County's beaches have received very favorable ratings from Heal the Bay's annual report<sup>3</sup>. Summer Dry Grades were excellent and just above the five-year average with 98% of beaches receiving A or B grades. Wet weather grades were also better than average with 63% of the beaches receiving A and B grades. Winter Dry Grades were stellar with 94% of the beaches receiving A and B grades. Orange County received nineteen (19) inches of rain, which is 116% higher than the historical average of nine (9) inches. The very large increase in rainfall did not appear to have a negative impact on Wet Weather Grades<sup>1</sup>.

<sup>3</sup> Heal the Bay. 2023. 2022-2023 Beach Report Card. Accessed from: <https://healthebay.org/beachreportcard2022-2023/>

OC San's Dry Weather Urban Runoff Diversion Program provides an important economic benefit to the Orange County economy by maintaining the coastline's reputation as a desirable tourist destination. By helping to keep our beaches open, the program continues to provide a significant benefit to the beach-going public.

The role of the Dry Weather Urban Runoff Diversion Program expanded with the addition of diversions issued to the Big Canyon permit on February 1, 2015; Peters Canyon on July 1, 2016; and Mid Big Canyon on August 9, 2017. Constructed to reduce selenium-laden waters reaching the Upper Newport Bay, these diversions enhance the estuarine environment for the threatened and endangered species that inhabit the area. Based upon the County of Orange's estimate, diversion of the various Peters Canyon Wash and Big Canyon tributaries would decrease the amount of selenium reaching the bay by 150 to 250 pounds annually. Based upon the flow and monitoring data received for these three diversions, as much as twenty seven (27) pounds of selenium were diverted from the bay during the FY 2022/23 reporting period.

This rerouting of Dry Weather Urban Runoff from stormwater pump stations, flood control channels, and natural conveyances before it reaches receiving waters, allows OC San to assist with regional public health and water quality protection alongside its primary function of maintaining high quality collection, treatment, and disposal of wastewater. In this manner, the program assists in providing vital protection to the Areas of Special Biological Significance along Orange County's coastline.

#### **9.5.4 Dry Weather Urban Runoff Diversion Locations**

The diversion systems are located in four different watersheds in Orange County: Anaheim Bay – Huntington Harbor, Lower Santa Ana River, Newport Bay, and Newport Coastal. These watersheds encompass a variety of designated land uses, such as residential, commercial, industrial, and agriculture.

#### **9.5.5 Dry Weather Urban Runoff Diversion Enforcement Actions**

##### **City of Newport Beach**

In FY 2022/23, OC San continued to communicate with CNB on a monthly basis to correct deficiencies and non-compliance issues which carried over from FY 2021/22 including corrective action to ensure the shutoff valve at Mid-Big Canyon would positively isolate the facility during deactivation periods. Additionally, despite continuing conversations regarding DWURD permit reporting requirements for the Dunes and Mid Big Canyon facilities, CNB incurred additional non-compliances for failure to submit complete and response Monthly Meter Reading Reports (MMRRs) for January and February 2023 and failure to submit Daily Discharge Flow Reports (DDFRs) for the monitoring periods from March to June 2023. By the end of the reporting period, CNB had not yet reported completed corrective actions and submitted late MMRRs and overdue DDFRs. OC San will pursue completion of the corrective action in the next reporting period.

##### **City of Huntington Beach**

CHB's renewed DWURD permits (effective March 1, 2023) contain monthly DDFR. CHB failed to submit DDFR reporting requirements which remain overdue by the end of the reporting period. Additionally, CHB failed to conduct and submit the required annual effluent meter calibration for ten of its eleven facilities, in accordance with permit requirements. On January 1, 2023, the effluent flow meter totalizer of the 1<sup>st</sup> CDS Unit diversion was reset despite OC San's requirement of non-resettable totalizer for flow measuring device. Although OC San held discussions with CHB personnel regarding the required effluent meter calibration reporting requirement and deficient totalizer equipment, completed calibration reports and a report of corrective action for the resettable totalizer remain outstanding and incomplete. OC San intends to review the CHB's overall compliance status and escalate enforcement action, as appropriate, in the next reporting period.

##### **Orange County Public Works**

Due to OCPW's failure to submit the periodic Self-Monitoring Report for the Greenville Diversion in October 2022, OC San issued a failure to submit notice. OCPW staff attributed the non-compliance to clerical errors and submitted the missing report on November 29, 2022. OC San plans no additional enforcement action for this non-compliance.

## **PH Finance, LLC**

Based on the January and February 2023 MMRR, OC San became aware that PH Finance, LLC (Pelican Point) replaced its diversion's effluent flow meter in February 2023; however the MMRRs also were incomplete and nonresponsive submittals due to missing information. OC San communicated these findings with Pelican Point and required corrected reports which Pelican Point resubmitted in a timely manner. However, during a routine end of fiscal year quality assurance review, OC San identified several inconsistent totalizer meter reading values reported in the subsequent MMRRs (for periods from February thru June 2023). In addition, Pelican Point failed to submit DDFRs for the March through June 2023 reporting periods. OC San intends to review the Pelican Point's overall compliance status and escalate enforcement action, as appropriate, in the next reporting period.

### **9.6 Dental Amalgam Source Control Program**

On June 14, 2017, the US EPA published technology-based pretreatment standards under the Clean Water Act to reduce discharges of mercury from dental offices into Publicly Owned Treatment Works. The new Dental Office Point Source category requires dental offices to utilize amalgam separators and implement two BMPs. The Dental Office Point Source category became effective on July 14, 2017.

New dental facilities opened on or after July 14, 2017, designated Pretreatment Standards New Sources (PSNS), must immediately comply with pretreatment standards, including the installation of amalgam separators. A one-time compliance report must be submitted to OC San no later than 90 days following the introduction of wastewater to OC San. Although PSNS does not include the purchase of an existing dental facility, those facilities changing ownership must also submit their report no later than 90 days following the transfer. Existing facilities designated as Pretreatment Standards Existing Sources that started before July 14, 2017 without amalgam separators on June 14, 2017, must install amalgam separators by July 14, 2020, and submit their one-time compliance reports by October 12, 2020. Existing dental facilities with amalgam separators on June 14, 2017, must replace those separators by June 14, 2027, or whenever the amalgam separator needs to be replaced, whichever is earlier.

To conform to this federal pretreatment program requirement, OC San implemented a Dental Amalgam Source Control Program to enable the dental offices to comply with this new regulation. OC San developed and posted Dental Office Point Source category information on the OC San website ([www.ocsan.gov](http://www.ocsan.gov)) complete with links to the US EPA's development document, effluent guidelines, fact sheet, and the applicable dental category regulation. This information was present on the website as of August 2017. Two compliance report forms were developed for the dental facilities: a comprehensive form for facilities that place or remove amalgam, and a second exempt/limited form for facilities that only remove amalgam on a limited or emergency basis. The forms were first made available in September 2017, and a new form, combining the exempt and non-exempt forms was made available in May 2022.

As required by the regulation, OC San implemented procedures for receiving, reviewing, and retaining dental office compliance reports. OC San has conducted multiple mass mailings to dental offices in OC San's service area since January 2018. As of the end of this reporting period OC San has received and processed 2,000 reports. OC San is currently assisting nonresponding and new dental offices with their report submittal and by follow up emails, phone calls and on-site visits. These activities are ongoing.

OC San continues to explore using automation to support the Dental Amalgam Program.

### **9.7 Public Education and Outreach**

In addition to the public education and outreach conducted by OC San's Public Affairs Office, Resource Protection Division staff routinely work with OC San's Member Agencies; attend interagency and professional organization meetings, conferences, and workshops; serve on committees, and make presentations. Working with other agencies and professional organizations benefits OC San by helping OC San keep abreast of potential future regulations and trends which may be beneficial or have impacts that OC San must prepare for, as well as providing information to the public about OC San's programs.

## Appendix A. Monitoring and Compliance Status Report

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

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)	4	20	9	Copper		
A & K Deburring and Tumbling, Inc.	1-511362	2008 S. Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	4	19	4			
A & R Powder Coating, Inc.	1-021088	1198 N. Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	4	20	8			
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	4	65	20			
Accurate Circuit Engineering	1-011138	3019 S. Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	30	8			
Active Plating, Inc.	1-011115	1411 E. Pomona St, Santa Ana, CA 92705	332813	433.17(a)	4	30	64			
ADS Gold, Inc.	Z-321851	3843 E. Eagle Dr, Anaheim, CA 92807	331410	433.17(a)	0	0	0			
Advance-Tech Plating, Inc.	1-021389	1061 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	5	14	58			
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)	4	14	8			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

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)	4	41	62			
Alexander Oil Company	1-581185	19065 Stewart St, Huntington Beach, CA 92648	211111	403.5(d)	3	0	0			Class 1 Permit Deactivated
All Metals Processing of Orange County, LLC	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	5	39	20			Formerly listed as All Metals Processing of O.C., Inc.
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	4	59	0		Published as SNC for reporting violation(s)	
Allied Electronics Services, Inc.	1-011073	1342 E. Borchard Unk, Santa Ana, CA 92705	334412	433.17(a)	4	25	8			

## APPENDIX A

### LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23 ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325611	417.166, 417.176, 417.66, 417.86	4	23	4			
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)	4	16	30			
Alloy Tech Electropolishing, Inc.	1-011036	2220 S. Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	4	23	8	Molybdenum,Zinc		
Alsco, Inc.	1-021656	1755 S. Anaheim Blvd, Anaheim, CA 92802	812331	403.5(d)	4	24	17	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)	4	30	22	Zinc		
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Ave, Santa Ana, CA 92704	332112	467.45	4	24	10			
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	4	28	19	Copper		
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave, Santa Ana, CA 92704	332112	467.46	4	18	10			
Amerimax Building Products	1-021102	1411 N. Daly St, Anaheim, CA 92806	332812	465.35	5	29	8	Zinc		Formerly listed as Amerimax Building Products, Inc.
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	4	22	0			
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	5	25	6			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	5	21	24			
AnoChem Coatings	1-600295	1102 E. Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	4	34	11			
Anodyne, Inc.	1-511389	2230 S. Susan St, Santa Ana, CA 92704	332813	433.17(a)	4	24	23			
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 W. Rowland St, Santa Ana, CA 92707	332813	433.17(a)	4	26	20			
APCT Anaheim	1-600689	250 E. Emerson Ave, Orange, CA 92865	334112	433.17(a)	5	31	20			
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	5	34	64	Copper		
ARO Service	1-021192	1186 N. Grove St, Anaheim, CA 92806	336411	433.17(a)	8	22	6	Copper, Zinc		
Arrowhead Operating Inc.	1-601062	219 First St, Huntington Beach, CA 92648	211111	403.5(d)	4	21	4			



## APPENDIX A

### LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23 ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
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)	9	50	27	Fluoride,NH3,Zinc	Published as SNC for discharge violation(s)	
Astech Engineered Products (2)	1-601719	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	6	39	16			Class 1 Permit Deactivated
Astech Engineered Products, Inc. (Bldg. 2 Outside)	Z- 371320	3030 Red Hill Ave, Santa Ana, CA 92705	336412	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	1	0	0			Zero Discharge Certification Deactivated
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	6	21	8		Published as SNC for reporting violation(s)	
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336412	433.17(a)	4	20	10			
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325414	439.17, 439.27	4	59	82			
B&B Enameling, Inc.	Z- 331432	17591 Sampson Ln, Huntington Beach, CA 92647	332812	433.17(a)	2	0	0			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.26, 463.36	5	43	10			
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	5	57	10			
B. Braun Medical, Inc. (West/Lake)	1-541183	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.16, 463.26, 463.36	5	63	10	pH		
B/E Aerospace Machine Products	Z-601769	7155 Fenwick Ln, Westminster, CA 92683	336419	433.17(a)	1	0	0			New Zero Discharge Certification Issued
Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	6	22	8			
BAZZ HOUSTON CO .	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	4	24	12			
Beckman Coulter, Inc.	1-521824	200 S. Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	5	13	5			
Beo-Mag Plating	1-511370	3313 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	23	27			
Beverage Visions LLC (Anaheim)	1-601448	4940 E. Landon Dr, Anaheim, CA 92807	311421	403.5(d)	1	6	1	pH		Class 1 Permit Deactivated
Beverage Visions LLC (Yorba Linda)	1-601449	24855 Corbit Pl, Yorba Linda, CA 92887	311421	403.5(d)	7	33	12			
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S. Placentia Ave, Placentia, CA 92870	311812	403.5(d)	5	21	4			
Bioduro LLC (Fairbanks)	1-601616	72 Fairbanks Unk, Irvine, CA 92618	325412	439.47	4	54	21		Published as SNC for reporting violation(s)	
Bioduro LLC (Jeronimo)	1-601617	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	3	28	21	acetone	Published as SNC for reporting violation(s)	

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Black Oxide Industries, Inc.	1-021213	1735 N. Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	5	27	7	pH		
Blue Lake Energy	1-521785	5721 Casson Dr, Yorba Linda, CA 92886	211111	403.5(d)	7	17	4			
Blue Ribbon Container and Display, Inc.	1-601468	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	4	19	4			
Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	4	21	3		Published as SNC for reporting violation(s)	
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	4	22	7			
Brasstech, Inc	1-600316	1301 E. Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	6	20	8			
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221112	403.5(d)	6	26	4	pH	Published as SNC for reporting violation(s)	
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	435.34(b)	4	19	11			
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	435.34(b)	4	27	5			
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	435.34(b)	4	28	5			
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	4	31	5			
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	4	29	5			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

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)	5	45	80			
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	405.86	4	20	3			
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	405.86	4	20	3			
Cadillac Plating, Inc.	1-021062	1147 W. Struck Ave, Orange, CA 92867	332813	433.17(a)	5	33	58			
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20			
Cali Chem Inc. dba Be Beauty	1-601976	14271 Corporate Dr, B Ste, Garden Grove, CA 92843	325620	417.86	1	0	0			New Class 1 Permit Issued
California Faucets	Z-331431	5231 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	1	0	0			
California Gasket and Rubber Corporation	1-521832	533 W. Collins Ave, Orange, CA 92867	339991	428.66(a)	4	6	4			
CalNRG Operating, LLC	1-601486	2930 E. Frontera St. Unit A St, Anaheim, CA 92806	211111	403.5(d)	5	20	5	O&G min.		
Cargill, Inc.	1-031060	600 N. Gilbert St, Fullerton, CA 92833	311225	403.5(d)	4	23	24			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	4	26	10			
CD Video, Inc.	1-511076	12650 Westminster Ave, Garden Grove, CA 92843	334613	433.17(a)	5	21	8			
Central Powder Coating	1-021189	593 Explorer St, Brea, CA 92821	332812	433.17(a)	0	0	0			Class 1 Permit Deactivated
Chromadora, Inc.	1-511414	2515 S. Birch St, Santa Ana, CA 92707	332813	433.17(a)	7	25	27			
Circuit Technology, Inc.	1-521821	1911 N. Main St, Orange, CA 92865	334112	433.17(a)	5	24	7			
City of Anaheim - Public Utilities Dept	1-021073	6751 E. Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	4	16	53			
City of Anaheim Public Utilities (Water Services WRF)	1-521843	210 S. Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	4	9	0			Formerly listed as City of Anaheim Public Utilities (Water Services WRDF)
City of Anaheim, Public Utilities Department	1-600296	3071 E. Miraloma Ave, Anaheim, CA 92806	22112	403.5(d)	4	30	2			Formerly listed as City of Anaheim, Canyon Power Plant
City of Fullerton (Public Works Department)	1-601835	1580 W. Commonwealth Ave, Fullerton, CA 92833	921190	403.5(d)	2	6	3			New Class 1 Permit Issued
City of Huntington Beach Fire Department	1-111015	19081 Huntington St, Huntington Beach, CA 92648	211111	403.5(d)	1	0	0			Class 1 Permit Deactivated
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	435.33(b)	4	17	18			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	4	23	15			
City of Tustin Water Service (17th St.)	1-071013	18602 E.17th St, Santa Ana, CA 92705	221310	403.5(d)	4	21	2			
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)	4	21	12			
CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave, Costa Mesa, CA 92627	332911	433.17(a)	2	0	0			
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St, Huntington Beach, CA 92649	334412	433.17(a)	5	30	51	Copper, pH	Published as SNC for reporting violation(s)	
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave, Garden Grove, CA 92841	332812	433.17(a)	4	14	4			
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	4	30	8			
Colores Powder Coating	Z-601858	2905 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, Yorba Linda, CA 92886	211111	403.5(d)	5	16	4			
Continuous Coating Corporation	1-021290	520 W. Grove Ave, Orange, CA 92865	332812	433.17(a), 465.15	4	26	18			Class 1 Permit Deactivated

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	435.33(b)	4	23	0		Published as SNC for reporting violation(s)	
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	4	18	12			
Corru-Kraft Fullerton	1-601450	1911 E. Rossllyn Ave, Fullerton, CA 92831	322211	403.5(d)	4	19	4			
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	4	18	12			
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	6	24	7	Copper, O&G min.	Published as SNC for discharge violation(s)	
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)	4	34	8			
CRH California Water, Inc.	1-011051	502 S. Lyon St, Santa Ana, CA 92701	312112	403.5(d)	2	11	4			
Custom Enamellers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	5	24	8			
Cytec Engineered Materials	Z-600005	1440 N. Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	1	0	0			Formerly Listed as Cytec Engineered Materials, Inc.
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W. Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	4	20	4			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Dae Shin USA, Inc.	1-031102	610 N. Gilbert St, Fullerton, CA 92833	313310	410.56	4	22	0			
Darling Ingredients, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	4	28	9			
Data Aire, Inc. #2	1-021379	230 W. Blueridge Ave, Orange, CA 92865	332322	433.17(a)	3	3	0			Class 1 Permit Deactivated
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	6	30	68	Copper		
Data Solder, Inc.	1-521761	2915 S. Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	26	8	Lead		
Dayton Flavors, Inc.	1-600038	580 S. Melrose St, Placentia, CA 92870	311930	403.5(d)	4	13	4			
DCOR, LLC	1-111013	4541 Heil Ave, Huntington Beach, CA 92649	211111	403.5(d)	5	0	0			Class 1 Permit Deactivated
Derm Cosmetic Labs, Inc.	Z- 600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	0	0	0			
Diamond Environmental Services, LP	1-600244	1801 Via Burton None, B Unit, Fullerton, CA 92831	562991	403.5(d)	5	24	4			
DNR Industries, Inc.	Z- 601019	1562 S. Anaheim Blvd, A&B Ste, Anaheim, CA 92805	811111	433.17(a)	1	0	0			
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave, Fullerton, CA 92833	311930	403.5(d)	5	21	4	pH		
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	4	5	12			



**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
DS Services of America	1-021393	1522 N. Newhope St, Santa Ana, CA 92703	312112	403.5(d)	4	20	4			
Ducommun Aerostructures, Inc.	1-021105	1885 N. Batavia St, Orange, CA 92865	336413	433.17(a)	4	29	23			
Dunham Metal Plating Inc.	1-601023	1764 N. Case St, Orange, CA 92865	332813	433.17(a)	4	29	19	Zinc		
Dunham Metal Processing	1-021325	936 N. Parker St, Orange, CA 92867	332813	433.17(a)	6	25	11	Nickel		
E&B Natural Resources-Angus Petroleum Corporation	1-600254	1901 California St, Huntington Beach, CA 92648	211111	435.34(b)	4	29	8			
Eco Pure LLC	1-601406	1920 E. Warner Ave, Suite 3P, Santa Ana, CA 92705	812220	403.5(d)	4	12	3			
EFT Fast Quality Service, Inc.	1-011064	2328 S. Susan St, Santa Ana, CA 92704	334112	433.17(a)	4	18	8			
Electro Metal Finishing Corporation	1-021158	1194 N. Grove St, Anaheim, CA 92806	332812	433.17(a)	5	24	57			
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	42	32	Cadmium, Copper, Nickel		
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	5	22	63			
Electron Plating III, Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	4	29	20			Formerly listed as Electron Plating Inc.
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	4	30	20			
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)	3	30	24			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
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)	4	30	16			
Emerald SoCal, LLC / Emerald Orange	1-601615	1575 N. Case St, Orange, CA 92867	812332	403.5(d)	5	22	4			
Excello Circuits, Inc. (Hunter)	1-601356	5330 E. Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	4	30	7			
Expo Dyeing and Finishing, Inc.	1-031322	1365 N. Knollwood Cir, Anaheim, CA 92801	313310	410.54	4	21	0			
Fabrica International, Inc.	1-011278	3201 S. Susan St, Santa Ana, CA 92704	314110	403.5(d)	4	21	0			
Fabrication Concepts Corporation	1-011068	1800 E. Saint Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	4	30	9		Published as SNC for reporting violation(s)	
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	4	29	7			
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)	4	37	71			
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	4	65	20			
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)	4	18	4			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Gemtech Coatings	Z-600544	2737 S. Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	1	0	0			
Gemtech Coatings (Explorer)	1-601761	593 Explorer St, Brea, CA 92821	332812	433.17(a)	7	20	15			New Class 1 Permit Issued
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	4	15	7			
Gold Coast Baking Company, Inc.	1-601700	1505 E. Warner Ave, Santa Ana, CA 92705	311812	403.5(d)	5	23	2	pH	Published as SNC for reporting violation(s)	
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	417.166	5	30	20	O&G min.		
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	4	19	4			
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336211	433.17(a)	6	24	19			
Harry's Dye & Wash, Inc.	1-521746	1015 E. Orangethorpe Ave, Anaheim, CA 92801	313310	403.5(d)	4	22	12			
Hartwell Corporation	1-021381	900 Richfield Rd, Placentia, CA 92870	332999	403.5(d)	4	24	8		Published as SNC for reporting violation(s)	
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	435.34(b)	4	33	6			
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	4	28	60			
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell Unk, Orange, CA 92865	332813	433.17(a)	4	32	19	CN	Published as SNC for discharge violation(s)	

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	4	39	65			
House Foods America Corporation (East)	1-600906	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	4	20	0			
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	4	20	0			
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(ll), 471.35(rr), 471.35(tt), 471.35(uu), 471.35(vv), 471.65(jj), 471.65(mm), 471.65(nn), 471.65(oo), 471.65(pp), 471.65(qq), 471.65(rr), 471.65(uu), 471.65(ww), 471.65(xx)	4	51	29			
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 N. Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	4	30	7			
Ikon Powder Coating, Inc.	1-521756	1375 N. Miller St, Anaheim, CA 92806	332812	433.17(a)	4	20	7			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Image Technology, Inc.	1-521755	1380 N. Knollwood Cir, Anaheim, CA 92801	325611	417.86	4	9	2			
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	405.86	4	20	4			
Independent Forge Company	Z-601008	692 N. Batavia St, Orange, CA 92868	332112	467.45	1	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)	4	16	6			
Intec Products, Inc.	1-021399	1145 N. Grove St, Anaheim, CA 92806	314999	410.36, 410.46	4	24	3			
International Paper Company (Anaheim)	1-521820	601 E. Ball Rd, Anaheim, CA 92805	322211	403.5(d)	4	13	6			
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	4	17	4			
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	4	14	4			
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	4	1	2			
Irvine Ranch Water District - DATS	1-011075	1704 W. Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	4	21	5			
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear None, Irvine, CA 92618	339112	403.5(d)	5	18	2	pH		

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
J & R Metal Finishing Co.	1-521823	307 N. Euclid Way, H1 Bldg, Anaheim, CA 92801	332812	403.5(d)	6	19	6			Class 1 Permit Deactivated
J and J Operators LLC	1-601614	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	21	4			
J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Ste, Newport Beach, CA 92663	336611	403.5(d)	5	14	6			
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	5	36	20			
JD Processing, Inc. (West)	1-600978	2310 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	4	0	0			
Jellco Container, Inc.	1-021402	1151 N. Tustin Ave, Anaheim, CA 92807	322212	403.5(d)	8	31	10	Molybdenum		
JOHN A. THOMAS - BOLSA OIL	1-031065	18701 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	4	33	6			
Joint Forces Training Base, Los Alamitos	1-031270	4230 Constitution Ave, 35 Bldg, Los Alamitos, CA 90720	928110	403.5(d)	5	22	2			
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	5	27	8			
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N. Anaheim Blvd, Anaheim, CA 92801	423930	403.5(d)	4	12	6			
Kirkhill, Inc. (North)	1-600608	300 E. Cypress St, Brea, CA 92821	339991	428.76(a)	4	27	8			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Kirkhill, Inc. (South)	1-600609	300 E. Cypress St, Brea, CA 92821	339991	428.76(a)	9	18	8			
Koia Anaheim Facility, LLC	1-601767	4940 E. Landon Dr, Anaheim, CA 92807	311421	403.5(d)	4	19	4	pH		New Class 1 Permit Issued
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	5	22	1	pH	Published as SNC for reporting violation(s)	
Kryler Corporation	1-021428	1217 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	5	35	8			
Kyocera SGS Precision Tools, Inc.	1-511385	3565 Cadillac Ave, Costa Mesa, CA 92626	333515	403.5(d)	4	17	4			Class 1 Permit Deactivated
La Habra Bakery	1-031029	850 S. Cypress St, La Habra, CA 90631	311812	403.5(d)	5	22	12			
La Habra Plating Company	Z-331399	900 S. Cypress Unk, La Habra, CA 90631	332813	433.17(a)	1	0	0			
LGM Subsidiary Holdings LLC	1-601313	17802 Gillette Ave, Irvine, CA 92614	325412	439.47	4	59	20			
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	336413	433.17(a)	6	23	7	Copper		
Linco Industries, Inc.	1-021253	528 S. Central Park Ave, West , Anaheim, CA 92802	332812	433.17(a)	6	34	23	Chromium, CN, Molybdenum	Published as SNC for discharge violation(s)	
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	6	28	20			
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	9	3	Nickel	Published as SNC for reporting violation(s)	

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
M.S. Bellows	1-111007	5322 McFadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	5	25	8			
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)	4	22	7			
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	4	24	3		Published as SNC for reporting violation(s)	
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E. Rosslenn Ave, Fullerton, CA 92831	322211	403.5(d)	4	23	8			
Markland Manufacturing, Inc.	1-011046	1111 E. McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	4	32	26		Published as SNC for reporting violation(s)	
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	4	13	4			
Maruchan, Inc. (Deere-South)	1-601021	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	4	13	4			
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, Irvine, CA 92618	311824	403.5(d)	4	13	8			
Marukome USA, Inc.	1-141023	17132 Pullman St, Irvine, CA 92614	311991	403.5(d)	4	21	4			
Master Wash, Inc.	1-511399	3120 Kilson Dr, Santa Ana, CA 92707	811192	403.5(d)	4	13	4		Published as SNC for reporting violation(s)	
McKenna Labs, Inc.	1-021422	1601 E. Orangethorpe Ave, Fullerton, CA 92831	325620	417.86, 439.47	5	41	26			



**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
McKenna Labs, Inc. (Acacia)	1-601842	1101 S. Acacia Ave, Fullerton, CA 92831	325620	417.86, 439.47	2	0	0			New Class 1 Permit Issued
MCP Foods, Inc.	1-021029	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	4	18	0			
Meggitt (Orange County), Inc.	1-601115	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	2	0	0			Class 1 Permit Deactivated
Meggitt Orange County	1-601843	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	2	14	17			New Class 1 Permit Issued
Merical, LLC	1-600655	233 E. Bristol Ln, Orange, CA 92865	325412	439.47	6	36	6	Zinc	Published as SNC for discharge and reporting violation(s)	
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	4	18	4			
Micro Precision Swiss, LLC	Z-601490	3233 W. Harvard St, Santa Ana, CA 92704	339113	433.17(a)	1	0	0			
Micrometals, Inc.	1-021153	5615 E. La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	5	27	6	Lead		
MTC Corp	1-600443	11161 Slater Ave, Fountain Valley, CA 92708	336111	426.66	4	20	2			
Murrietta Circuits	1-521811	5000 E. Landon St, Anaheim, CA 92807	334418	433.17(a)	4	32	8			
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	6	23	4			
National Construction Rentals	1-600652	1550 E. Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	4	23	4			
Neutron Plating, Inc.	Z-321812	2993 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	403.5(d)	4	40	9			
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	4	9	1			
Newport Corporation	1-601837	1931 Deere Ave, Irvine, CA 92606	334516	433.17(a)	3	15	8	pH		New Class 1 Permit Issued
Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	5	26	1			
Nikkiso ACD	Z-601703	2321 Pullman St, Santa Ana, CA 92705	334513	433.17(a)	1	0	0			
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	4	23	6		Published as SNC for reporting violation(s)	
Nor-Cal Beverage Company (Main)	1-021284	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	4	21	0			Formerly listed as Nor-Cal Beverage Co., Inc. (Main)
O'Donnell Oil, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	435.33(b)	4	2	0		Published as SNC for reporting violation(s)	Formerly listed as O'Donnell Oil Company, LLC
O.C. Waste & Recycling	1-141018	20661 Newport Coast Dr, Newport Beach, CA 92657	562910	403.5(d)	4	19	4			
Oakley, Inc.	1-141012	1 Icon Unk, Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	4	0	0			
Omni Metal Finishing, Inc	Z-601973	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	1	0	0			New Zero Discharge Certification Issued

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	5	29	8			
Only Cremations for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	4	13	9			
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	4	10	5		Published as SNC for reporting violation(s)	
Orange County Chemical Supply Company, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	7	23	4			Formerly listed as Orange County Chemical Supply, Inc.
Ortronics, Inc.	Z-601203	1443 S. Sunkist St, Anaheim, CA 92806	423430	433.17(a)	1	0	0			
OSI OPTO Electronics Inc. DBA Semicoa	1-601869	333 McCormick Ave, Costa Mesa, CA 92626	334413	433.17(a), 469.18(a)	2	5	5			New Class 1 Permit Issued
Pacific Chrome Services	Z-311396	603 E. Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	1	0	0			Zero Discharge Certification Deactivated
Pacific Chrome Services	Z-601871	603 E. Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Pacific Image Technology, Inc.	1-021070	1875 S. Santa Cruz St, Anaheim, CA 92805	334112	433.17(a)	4	29	7			
Pacific Western Container	1-511371	4044 W. Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	4	16	4		Published as SNC for reporting violation(s)	
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	1	0	0			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W. Freedom Ave, Orange, CA 92865	562219	437.47(b)	4	36	25	4-Methylphenol		
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W. Freedom Ave, Orange, CA 92865	562219	403.5(d)	4	24	9			
PCC Rollmet, Inc.	Z-601822	1822 Deere Ave, Irvine, CA 92606	33121	467.36(c), 471.35(i), 471.35(u), 471.35(v)	0	0	0			New Zero Discharge Certification Issued
PCX Aerosystems - Santa Ana	1-601618	2040 E. Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	4	14	32			
Performance Powder, Inc.	1-521805	2920 E. La Jolla St, Anaheim, CA 92806	332812	433.17(a)	4	31	8	Zinc	Published as SNC for reporting violation(s)	
Petroprize, Inc.	1-581180	319 20th St, Huntington Beach, CA 92648	211111	435.34(b)	4	19	4			Formerly listed as Petroprize Corporation
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	435.34(b)	4	18	3			
Pioneer Circuits, Inc.	1-011262	3010 S. Shannon St, Santa Ana, CA 92704	334412	433.17(a)	4	34	19			
Platinum Surface Coating, Inc.	1-521852	1173 N. Fountain Way, Anaheim, CA 92806	332813	433.17(a)	5	21	10			
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way, Placentia, CA 92870	211111	403.5(d)	4	17	4			
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St, Yorba Linda, CA 92886	211111	403.5(d)	6	18	4			
Porter Powder Coating, Inc.	Z-321817	510 S. Rose St, Anaheim, CA 92805	332812	433.17(a)	2	0	0			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Powdercoat Professionals Inc.	Z-600275	2905 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			Zero Discharge Certification Deactivated
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N. Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	4	18	8			
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N. Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	4	18	8			
PowderCoat Services, LLC. Plant 5	1-600355	1747 W. Lincoln Ave, L1 Bldg, Anaheim, CA 92801	332812	433.17(a)	4	18	8			
Power Distribution, Inc.	1-511400	4011 W. Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	4	24	4	Copper		
PowerDrive Oil & Gas Company, LLC (2nd)	1-600248	120 Second St, Huntington Beach, CA 92648	211111	435.34(b)	4	26	4			
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	4	33	20			
Precision Anodizing & Plating, Inc.	1-521809	1601 N. Miller St, Anaheim, CA 92806	332813	433.17(a)	4	29	19			
Precision Circuits West, Inc.	1-011008	3310 W. Harvard St, Santa Ana, CA 92704	334412	433.17(a)	4	27	8			
Precision Resource, California Division	1-111002	5803 Engineer Dr, Huntington Beach, CA 92649	332710	403.5(d)	4	18	8			
Precon, Inc.	1-021581	3131 E. La Palma Ave, Anaheim, CA 92806	332721	403.5(d)	4	30	19			
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	3	17	4			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	4	24	6			
Pulmuone Foods USA, Inc. (East)	1-601443	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	6	23	0	pH		
Q-Flex Inc.	1-600337	1301 E. Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	6	24	8	Copper		
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N. Cypress St, Orange, CA 92867	332112	467.45	6	25	9			
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N. Cypress St, Orange, CA 92867	332112	467.46	4	24	9			
Quiikturn Professional Screenprinting	1-521858	567 S. Melrose St, Placentia, CA 92870	333249	403.5(d)	4	20	4			
Ram Screen Printing, Inc.	1-601652	3369 E. Miraloma Ave, Anaheim, CA 92806	323113	403.5(d)	2	6	4			New Class 1 Permit Issued
Rayne Dealership Corporation	1-571303	17835 Sky Park Cir, M Ste, Irvine, CA 92614	454390	403.5(d)	4	19	2			
RBC Transport Dynamics Corp.	1-011013	3131 W. Segerstrom Ave, Santa Ana, CA 92704	336413	433.17(a)	3	30	23	Zinc		
Rich Products Corporation (North)	1-601022	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	21	2			
Rich Products Corporation (South)	1-511404	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	21	3			
Rigiflex Technology, Inc.	1-021187	1166 N. Grove St, Anaheim, CA 92806	334418	433.17(a)	4	34	20			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Robinson Pharma, Inc. (Croddy)	1-511413	2632 S. Croddy Way, Santa Ana, CA 92704	325411	439.47	1	0	0			Class 1 Permit Deactivated
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	2811 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	27	18	14			Formerly listed as Robinson Pharma, Inc. (Harbor North)
Robinson Pharma, Inc. (Harbor South - H1)	1-511412	3330 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	4	37	25			Formerly listed as Robinson Pharma, Inc. (Harbor South)
Rolls-Royce High Temperature Composites, Inc.	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	4	12	2			
Rolls-Royce High Temperature Composites, Inc. (Fume Scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	4	12	2			
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 Lot Blk, Huntington Beach, CA 92648	211111	403.5(d)	4	20	4			
RP Finishing Group Inc.	Z-601358	1226 E. Ash Ave, Fullerton, CA 92831	332812	433.17(a)	2	0	0			Formerly listed as RP Finishing
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)	4	19	4			
Safety-Kleen Systems, Inc.	1-600690	2170 S. Yale St, Santa Ana, CA 92704	562211	403.5(d)	4	21	4			
Sanitor Corporation	1-601267	8400 Cerritos Ave, Stanton, CA 90680	325620	417.86, 439.47	5	35	22			

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	24	20			
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	26	21			
Santana Services	1-021016	1224 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	6	18	9	Chromium,Copper,Nickel		
Scientific Spray Finishes, Inc.	1-031311	315 S. Richman Ave, Fullerton, CA 92832	332812	433.17(a)	4	33	8			
Semicoa	1-571313	333 McCormick Ave, Costa Mesa, CA 92626	334413	469.18(a)	3	26	5			Class 1 Permit Deactivated
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	5	11	3			
SFPP, LP	1-021619	1350 N. Main St, Orange, CA 92867	493190	403.5(d)	4	0	0			
Shepard Bros., Inc.	1-031034	503 S. Cypress St, La Habra, CA 90631	325611	417.166, 417.176	6	28	5	O&G min.	Published as SNC for discharge and reporting violation(s)	
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332721	433.17(a)	4	0	0			
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	4	21	12			
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	5	25	8			
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	37	19		Published as SNC for reporting violation(s)	



**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	4	21	4	pH		
South Coast Circuits, Inc. (Bldg 3500 Ste A)	1-601444	3500 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	30	24			
South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	3506 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	34	12			
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	3512 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	26	24			
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	3524 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	26	12			
South Coast Water	1-511405	401 S. Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	4	19	6			
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	16	2			
Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	16	2			
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	16	2			
Spectrum Paint And Powder, Inc.	Z-321822	1332 S. Allec St, Anaheim, CA 92805	332812	433.17(a)	2	0	0			
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	4	23	7			

## APPENDIX A

### LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23 ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E. Warner Ave, Santa Ana, CA 92705	332722	433.17(a), 467.46, 467.66, 471.35(ee), 471.35(f), 471.35(ff), 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(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)	4	44	32			
Stainless Micro-Polish, Inc.	1-021672	1286 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	5	35	12			
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W. Collins Ave, Orange, CA 92867	332119	403.5(d)	6	19	95	O&G min.		
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	4	18	8			
Statek Corporation (Main)	1-021664	512 N. Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	4	29	6			
Statek Corporation (Orange Grove)	1-521777	1449 W. Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	5	28	2	pH		
Stepan Company	1-021674	1208 N. Patt St, Anaheim, CA 92801	325613	417.106, 417.146, 417.166	5	29	26	1,4-dioxane		

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave, Santa Ana, CA 92703	311511	405.16, 405.26, 405.76	4	20	0			
Summit Interconnect, Inc.	1-600012	223 N. Crescent Way, Anaheim, CA 92801	334412	433.17(a)	4	38	20	Copper		
Summit Interconnect, Inc., Orange Division	1-600060	230 W. Bristol Ln, Orange, CA 92865	334412	433.17(a)	5	40	20			
Sunny Delight Beverages Co.	1-021045	1230 N. Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	4	17	0			
Superior Connector Plating, Inc.	1-021090	1901 E. Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	8	29	75	Cadmium		
Superior Processing (2)	1-601701	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	5	30	17	CN		
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	6401 Regio Ave, Buena Park, CA 90620	311812	403.5(d)	0	0	0			New Class 1 Permit Issued
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	6491 Caballero Blvd, Buena Park, CA 90620	311991	432.126, 432.56	0	4	0			New Class 1 Permit Issued
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	4	18	8			
Taylor-Dunn Manufacturing, LLC (Waev)	1-601699	2114 W. Ball Rd, Anaheim, CA 92804	333924	433.17(a)	4	41	16			
Terra Universal, Inc.	1-601407	800 S. Raymond Ave, Fullerton, CA 92831	333999	433.17(a)	5	22	17			
Teva Parenteral Medicines, Inc.	1-141007	19 Hughes Unk, Irvine, CA 92618	325412	439.47	4	23	5			Class 1 Permit Deactivated
Thermal-Vac Technology, Inc.	1-021282	1221 W. Struck Ave, Orange, CA 92867	332811	433.17(a)	4	28	20	Nickel		

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Thompson Energy Resources, LLC (Brea)	1-601469	3351 E. Birch St, Brea, CA 92821	211111	435.34(b)	4	29	14		Published as SNC for reporting violation(s)	
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	423860	433.17(a)	4	26	10			
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	29	20			
Toyota Racing Development, USA, Inc.	1-071059	335 E. Baker St, Costa Mesa, CA 92626	336310	403.5(d)	5	18	16			Formerly listed as Toyota Racing Development
Transline Technology, Inc.	1-021202	1106 S. Technology Cir, Anaheim, CA 92805	334412	433.17(a)	4	31	8			
Tropitone Furniture Co., Inc.	1-141163	5 Marconi Unk, Irvine, CA 92618	337124	433.17(a)	4	28	17			
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St, Anaheim, CA 92806	334412	433.17(a)	8	38	20			
TTM Technologies North America, LLC. (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	4	30	20	Copper		
TTM Technologies North America, LLC. (Harbor)	1-511359	2640 S. Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	4	29	20			
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	439.47	4	27	4			
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	4	18	8			
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	7	24	0	pH		

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Venus Laboratories, Inc. dba Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	4	23	6			Formerly listed as Earth Friendly Products
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St, Anaheim, CA 92806	423930	403.5(d)	17	16	0	O&G min.	Published as SNC for reporting violation(s)	
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325412	439.47	4	65	14			
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	1	0	0			
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	16122 Construction Cir, West, Irvine, CA 92606	562212	403.5(d)	5	28	6	Sulfide		
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	5	11	4	Nickel	Published as SNC for discharge violation(s)	
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	1260 N. Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	4	24	4			
Weidemann Water Conditioners, Inc. (Fullerton)	1-021653	1702 E. Rossllyn Ave, Fullerton, CA 92831	333318	403.5(d)	0	0	0			Class 1 Permit Deactivated
West Newport Oil Company	1-061110	5800 W. Coast Hwy, Newport Beach, CA 92663	211111	403.5(d)	5	4	8			
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	435.34(b)	4	28	4			
Winonics (Brea)	1-031035	660 N. Puente St, Brea, CA 92821	334412	433.17(a)	4	32	8			
Winonics LLC. dba Bench 2 Bench Technologies	1-601974	1257 S. State College Blvd, Fullerton, CA 92831	334412	433.17(a)	0	0	0			New Class 1 Permit Issued

**APPENDIX A**  
**LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Winonics, Inc.	1-021735	1257 S. State College Blvd, Fullerton, CA 92831	334412	433.17(a)	6	42	19			Class 1 Permit Deactivated
Yakult USA, Inc.	1-521850	17235 Newhope St, Fountain Valley, CA 92708	311511	403.5(d)	4	21	12			
Zygo Corporation, division of Ametek, Inc.	1-601836	2031 Main St, Z Ste, Irvine, CA 92614	333314	433.17(a)	3	6	1			

## Appendix B. Summary of Priority Pollutants and Trace Constituents Analyses

---

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22		Aug 22		Sep 22		Oct 22		Nov 22		Dec 22		Jan 23		Feb 23		Mar 23		Apr 23		May 23		Jun 23				
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
EFF-001	Silver	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Arsenic	3.81	µg/L	3.27	µg/L		2.61	µg/L		2.71	µg/L		3.62	µg/L	1.79	µg/L	3.39	µg/L	3.91	µg/L	2.18	µg/L	1.62	µg/L	3.32	µg/L		
	Beryllium	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cadmium	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	0.22	µg/L	0.11	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.11	µg/L
	Cyanide	3.52	µg/L	2.64	µg/L		3.92	µg/L		3.3	µg/L		3.85	µg/L	4.76	µg/L	2.93	µg/L	4.38	µg/L	4.03	µg/L	4.27	µg/L	ND	µg/L		
	Chromium	1.00	µg/L	0.96	µg/L		0.87	µg/L		0.77	µg/L		0.97	µg/L	0.81	µg/L	1.09	µg/L	1.27	µg/L	0.79	µg/L	0.79	µg/L	1.09	µg/L		
	Copper	7.44	µg/L	3.3	µg/L		3.01	µg/L		4.77	µg/L		3.31	µg/L	7.04	µg/L	5.33	µg/L	5.42	µg/L	10.1	µg/L	3.66	µg/L	4.12	µg/L		
	Mercury	4.9	ng/L	3.1	ng/L		4	ng/L		4.4	ng/L		5	ng/L	6.1	ng/L	2.6	ng/L	3.9	ng/L	4.5	ng/L	3	ng/L	7	ng/L		
	Nickel	7.45	µg/L	8.47	µg/L		5.03	µg/L		5.61	µg/L		8.27	µg/L	5.13	µg/L	8.93	µg/L	9.26	µg/L	5.22	µg/L	5.48	µg/L	9.24	µg/L		
	1,1,1-Trichloroethane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,1,2,2-Tetrachloroethane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,1,2-Trichloroethane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,1-Dichloroethane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,2-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Dichloroethane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,2-Dichloropropane	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	1,3-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,4-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,3,7,8-Tetrachlorodibenzo-P-Dioxin	ND	µg/L	ND	µg/L		ND	µg/L		0.22	µg/L		ND	µg/L	0.36	µg/L	0.37	µg/L	0.41	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4,6-Trichlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dichlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dimethylphenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrotoluene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,6-Dinitrotoluene	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L				
	2-Chloronaphthalene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		0.15	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.17	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloroethylvinylether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
4-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Acenaphthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Acenaphthylene	ND	µg/L							ND	µg/L						ND	µg/L					ND	µg/L					



**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	
EFF-001	Aldrin	ND	µg/L							ND	µg/L			
	Anthracene	ND	µg/L							ND	µg/L			
	1,2-Diphenylhydrazine	ND	µg/L							ND	µg/L			
	Benzo (a) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Benzydine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Benzo (b) Fluoranthene	ND	µg/L					ND	µg/L				ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Chlordane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Chrysene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Di-n-Butyl Phthalate	ND	µg/L								ND	µg/L		
	Di-n-Octyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Dieldrin	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.61	µg/L	0.57
	Diethylphthalate	ND	µg/L								ND	µg/L		
	Dimethylphthalate	ND	µg/L								ND	µg/L		
	Endosulfan	ND	µg/L								ND	µg/L		
	Endosulfan I	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Endosulfan II	ND	µg/L								ND	µg/L		
	Endosulfan Sulfate	ND	µg/L								ND	µg/L		
	Endrin	ND	µg/L								ND	µg/L		
	Fluoranthene	ND	µg/L								ND	µg/L		
	Fluorene	4.67	µg/L								4.98	µg/L		
	Heptachlor	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Hexachlorobenzene	ND	µg/L								ND	µg/L		
	Hexachlorobutadiene	ND	µg/L								ND	µg/L		
	Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	0.34	µg/L	ND	µg/L	ND	µg/L	0.53	µg/L	0.41
	Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Isophorone	ND	µg/L								ND	µg/L		
	Nitrobenzene	ND	µg/L								ND	µg/L		
PCB - 1016	2.21	µg/L	ND	µg/L	5.43	µg/L	ND	µg/L	ND	µg/L	0.7	µg/L	ND	
PCB - 1221	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	
PCB - 1232	ND	µg/L								ND	µg/L			
PCB - 1242	ND	µg/L								ND	µg/L			
PCB - 1248	ND	µg/L								ND	µg/L			

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23								
EFF-001	PCB - 1254	ND	µg/L							ND	µg/L										
	PCB - 1260	ND	µg/L							ND	µg/L										
	Pentachlorophenol	ND	µg/L					ND	µg/L				ND	µg/L							
	Phenanthrene	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Phenol	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Pyrene	ND	µg/L								ND	µg/L									
	Acrolein	ND	µg/L								ND	µg/L									
	Acrylonitrile	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Alpha-BHC	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Benzene	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Beta-BHC	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Bis (2-Ethylhexyl) Phthalate	ND	µg/L						ND	µg/L									ND	µg/L	
	Bromodichloromethane	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Bromoform	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Bromomethane	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Carbon Tetrachloride	ND	µg/L	ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Chlorobenzene	ND	µg/L								ND	µg/L									
	Chloroethane	ND	µg/L								ND	µg/L									
	Chloroform	ND	µg/L								ND	µg/L									
	cis-1,3-Dichloropropene	ND	µg/L								ND	µg/L									
	Delta-BHC	ND	µg/L								ND	µg/L									
	Dibromochloromethane	ND	µg/L								ND	µg/L									
	Ethylbenzene	ND	µg/L								ND	µg/L									
	Gamma-BHC	ND	µg/L								ND	µg/L									
	Methylene Chloride	ND	µg/L								ND	µg/L									
	N-Nitrosodipropylamine	ND	µg/L								ND	µg/L									
	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L		ND	µg/L		0.73	µg/L	ND	µg/L	0.74	µg/L	0.82	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodiphenylamine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDD	ND	µg/L	ND	µg/L		ND	µg/L		0.2	µg/L	0.15	µg/L	0.19	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDE	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDT	ND	µg/L						ND	µg/L										ND	µg/L
	Tetrachloroethene	ND	µg/L						ND	µg/L										ND	µg/L
	Toluene	ND	µg/L						ND	µg/L										ND	µg/L
	trans-1,2-Dichloroethene	ND	µg/L						ND	µg/L										ND	µg/L
	trans-1,3-Dichloropropene	ND	µg/L						ND	µg/L										ND	µg/L
	Trichloroethene	ND	µg/L						ND	µg/L										ND	µg/L

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22		Aug 22		Sep 22		Oct 22		Nov 22		Dec 22		Jan 23		Feb 23		Mar 23		Apr 23		May 23		Jun 23			
EFF-001	Vinyl Chloride			ND	µg/L					ND	µg/L						ND	µg/L					ND	µg/L			
	Lead	0.12	µg/L	0.2	µg/L		ND	µg/L		0.15	µg/L		0.12	µg/L	0.17	µg/L	0.21	µg/L	0.22	µg/L	0.14	µg/L	ND	µg/L	ND	µg/L	0.24
	Antimony	1.14	µg/L	1.55	µg/L		0.96	µg/L		1.01	µg/L		1.5	µg/L	1.12	µg/L	1.78	µg/L	1.49	µg/L	0.8	µg/L	0.63	µg/L	0.63	µg/L	1.25
	Selenium	16.5	µg/L	9.96	µg/L		8.29	µg/L		10.1	µg/L		13.2	µg/L	8.57	µg/L	12.8	µg/L	13.2	µg/L	6.36	µg/L	6.33	µg/L	9.9		
	Thallium	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Zinc	21.7	µg/L	24.2	µg/L		14.9	µg/L		18.7	µg/L		24.1	µg/L	18.8	µg/L	32.2	µg/L	39.2	µg/L	21.9	µg/L	22.4	µg/L	25.4		
INF-001	Silver	0.624	µg/L	0.924	µg/L		0.718	µg/L		0.593	µg/L		0.916	µg/L	1.5	µg/L	0.608	µg/L	0.622	µg/L	0.75	µg/L	0.396	µg/L	0.616		
	Arsenic	2.52	µg/L	2.77	µg/L		2.86	µg/L		2.48	µg/L		2.57	µg/L	2.59	µg/L	2.44	µg/L	2.87	µg/L	2.48	µg/L	2.15	µg/L	2.16		
	Beryllium	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND		
	Cadmium	0.35	µg/L	0.26	µg/L		0.47	µg/L		0.32	µg/L		0.38	µg/L	0.55	µg/L	0.64	µg/L	0.38	µg/L	0.35	µg/L	0.26	µg/L	1.3		
	Cyanide	2.41	µg/L	2.86	µg/L		2.86	µg/L		ND	µg/L		ND	µg/L	5.04	µg/L	ND	µg/L	4.32	µg/L	2.52	µg/L	ND	µg/L	ND		
	Chromium	3.96	µg/L	4.08	µg/L		5.2	µg/L		4.38	µg/L		5.33	µg/L	4.68	µg/L	4.86	µg/L	4.49	µg/L	6.88	µg/L	4.53	µg/L	3.48		
	Copper	82.9	µg/L	80	µg/L		99.1	µg/L		81.3	µg/L		100	µg/L	81.6	µg/L	77.1	µg/L	77.8	µg/L	74.8	µg/L	72.3	µg/L	70.4		
	Mercury	100	ng/L	64	ng/L		150	ng/L		140	ng/L		29	ng/L	34	ng/L	3.7	ng/L	2.3	ng/L	3.6	ng/L	27	ng/L	5.2		
	Nickel	7.07	µg/L	7.42	µg/L		9.23	µg/L		7.38	µg/L		11.3	µg/L	6.13	µg/L	8.38	µg/L	6.62	µg/L	6.45	µg/L	6.63	µg/L	9.85		
	1,1,1-Trichloroethane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,1,2,2-Tetrachloroethane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,1,2-Trichloroethane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,1-Dichloroethane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,2-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	1,2-Dichloroethane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,2-Dichloropropane	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	1,3-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	1,4-Dichlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,4,6-Trichlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,4-Dichlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,4-Dimethylphenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	0.34	µg/L	0.41	µg/L	0.51	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,4-Dinitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,4-Dinitrotoluene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2,6-Dinitrotoluene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2-Chloronapthalene	ND	µg/L							ND	µg/L							ND	µg/L					ND	µg/L		
	2-Chlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	0.19	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2-Chloroethylvinylether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22		Aug 22		Sep 22		Oct 22		Nov 22		Dec 22		Jan 23		Feb 23		Mar 23		Apr 23		May 23		Jun 23		
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
INF-001	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthylene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Aldrin	ND	µg/L								1.15	µg/L						ND	µg/L						ND	µg/L
	Anthracene	ND	µg/L								ND	µg/L						ND	µg/L						ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L															ND	µg/L							
	Benzo (a) Anthracene	ND	µg/L															ND	µg/L							
	Benidine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L								ND	µg/L						ND	µg/L						ND	µg/L
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chlordane	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chrysene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Octyl Phthalate	ND	µg/L															ND	µg/L							
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dieldrin	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Diethylphthalate	6.74	µg/L	6.08	µg/L		6.89	µg/L		5.71	µg/L		5.73	µg/L	6.35	µg/L	5.86	µg/L	5.56	µg/L	5.7	µg/L	3.14	µg/L	4.53	µg/L
	Dimethylphthalate	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endosulfan	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endosulfan I	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endosulfan II	1.19	µg/L	1.24	µg/L		1.18	µg/L		0.7	µg/L		0.95	µg/L	1.63	µg/L	0.82	µg/L	0.99	µg/L	0.97	µg/L	1.15	µg/L	1.23	µg/L
	Endosulfan Sulfate	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endrin	ND	µg/L															ND	µg/L							
	Fluoranthene	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Fluorene	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Heptachlor	2.08	µg/L							2.57	µg/L							2.54	µg/L						1.7	µg/L
	Hexachlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
Hexachlorobutadiene	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L	
Hexachlorocyclopentadiene	ND	µg/L															ND	µg/L								
Hexachloroethane	0.96	µg/L	0.83	µg/L		1.04	µg/L		0.7	µg/L		0.94	µg/L	0.95	µg/L	0.96	µg/L	0.87	µg/L	0.71	µg/L	0.73	µg/L	0.97	µg/L	
Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Isophorone	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23													
INF-001	Nitrobenzene	ND	µg/L						ND	µg/L			ND	µg/L												
	PCB - 1016	ND	µg/L							ND	µg/L															
	PCB - 1221	3.63	µg/L	2.42	µg/L		3.75	µg/L		1.95	µg/L		5.57	µg/L	2.51	µg/L	1.47	µg/L	3.47	µg/L	2.91	µg/L	1.73	µg/L	3.59	
	PCB - 1232	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	PCB - 1242	ND	µg/L								ND	µg/L														
	PCB - 1248	ND	µg/L								ND	µg/L														
	PCB - 1254	ND	µg/L								ND	µg/L														
	PCB - 1260	ND	µg/L								ND	µg/L														
	Pentachlorophenol	ND	µg/L								ND	µg/L														
	Phenanthrene	ND	µg/L							ND	µg/L													ND	µg/L	
	Phenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Pyrene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Acrolein	ND	µg/L																							
	Acrylonitrile	ND	µg/L																							
	Alpha-BHC	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Benzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Beta-BHC	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Ethylhexyl) Phthalate	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bromodichloromethane	ND	µg/L							ND	µg/L													ND	µg/L	
	Bromoform	ND	ng/L	ND	µg/L		ND	µg/L		ND	ng/L													ND	µg/L	ND
	Bromomethane	63	ng/L	ND	µg/L		ND	µg/L		22.7	ng/L													ND	µg/L	28
	Carbon Tetrachloride	ND	ng/L	ND	µg/L		ND	µg/L		ND	ng/L				0.2	µg/L	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L
	Chlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Chloroethane	ND	µg/L																							
	Chloroform	ND	µg/L																							
	cis-1,3-Dichloropropene	ND	µg/L																							
	Delta-BHC	ND	µg/L																							
	Dibromochloromethane	ND	µg/L																							
	Ethylbenzene	ND	µg/L																							
	Gamma-BHC	ND	µg/L																							
	Methylene Chloride	ND	µg/L																							
N-Nitrosodipropylamine	ND	µg/L																								
N-Nitrosodimethylamine	ND	µg/L																								
N-Nitrosodiphenylamine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L				1.2	µg/L	0.83	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
4,4'-DDD	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L				ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	
	4,4'-DDE	18.1 µg/L	16.1 µg/L	17 µg/L		15.8 µg/L	17.8 µg/L	17.7 µg/L	12 µg/L	14 µg/L	14.8 µg/L	12.5 µg/L	15 µg/L	
	4,4'-DDT	ND µg/L	ND µg/L	ND µg/L		ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	Tetrachloroethene	ND µg/L				ND µg/L			ND µg/L			ND µg/L		
	Toluene	1.4 µg/L				ND µg/L			2.15 µg/L			ND µg/L		
	trans-1,2-Dichloroethene	ND µg/L				ND µg/L			ND µg/L			ND µg/L		
	trans-1,3-Dichloropropene	ND µg/L				ND µg/L			ND µg/L			ND µg/L		
	Trichloroethene	ND µg/L				ND µg/L			ND µg/L			ND µg/L		
	Vinyl Chloride	ND µg/L				ND µg/L			ND µg/L			ND µg/L		
	2,3,7,8-tetrachlorodibenzo-p-dioxin		ND pg/L							ND pg/L			ND pg/L	
	Lead	1.85 µg/L	5.19 µg/L	2.17 µg/L	2.24 µg/L	2.07 µg/L	1.87 µg/L	2.38 µg/L	1.51 µg/L	1.44 µg/L	1.73 µg/L	1.51 µg/L	1.51 µg/L	
	Antimony	1.16 µg/L	1.22 µg/L	1.17 µg/L	0.94 µg/L	1.24 µg/L	1.06 µg/L	1.16 µg/L	0.94 µg/L	0.89 µg/L	0.63 µg/L	0.85 µg/L	0.85 µg/L	
	Selenium	3.05 µg/L	2.33 µg/L	3.15 µg/L	3.36 µg/L	2.82 µg/L	3.08 µg/L	2.5 µg/L	3.32 µg/L	3.8 µg/L	3.64 µg/L	2.59 µg/L	2.59 µg/L	
	Thallium	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
Zinc	162 µg/L	153 µg/L	173 µg/L	154 µg/L	156 µg/L	151 µg/L	147 µg/L	155 µg/L	145 µg/L	127 µg/L	133 µg/L	133 µg/L		
INF-002	Silver	0.525 µg/L	0.434 µg/L	1.14 µg/L	1.12 µg/L	0.393 µg/L	0.912 µg/L	0.446 µg/L	0.369 µg/L	0.51 µg/L	0.242 µg/L	0.607 µg/L	0.607 µg/L	
	Arsenic	4.54 µg/L	4.38 µg/L	4.05 µg/L	4.54 µg/L	3.09 µg/L	4.41 µg/L	4.07 µg/L	4.27 µg/L	4.03 µg/L	3.91 µg/L	3.39 µg/L	3.39 µg/L	
	Beryllium	ND µg/L	ND µg/L	ND µg/L	0.28 µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	Cadmium	0.43 µg/L	0.3 µg/L	0.32 µg/L	0.74 µg/L	0.34 µg/L	0.36 µg/L	0.375 µg/L	0.29 µg/L	0.345 µg/L	0.255 µg/L	0.465 µg/L	0.465 µg/L	
	Cyanide	3.84 µg/L	2.64 µg/L	3.99 µg/L	3.17 µg/L	ND µg/L	9.95 µg/L	ND µg/L	1.19 µg/L	ND µg/L	1.15 µg/L	ND µg/L	ND µg/L	
	Chromium	9.44 µg/L	6.26 µg/L	7.62 µg/L	7.87 µg/L	4.17 µg/L	13.8 µg/L	7.81 µg/L	5.06 µg/L	5.59 µg/L	5.1 µg/L	5.21 µg/L	5.21 µg/L	
	Copper	50.8 µg/L	42.7 µg/L	56.2 µg/L	51.9 µg/L	51.1 µg/L	98.6 µg/L	145 µg/L	41 µg/L	47 µg/L	38.6 µg/L	56.1 µg/L	56.1 µg/L	
	Mercury	73 ng/L	28 ng/L	88 ng/L	45 ng/L	21 ng/L	11.9 ng/L	5.25 ng/L	8.5 ng/L	43.5 ng/L	19 ng/L	29.65 ng/L	29.65 ng/L	
	Nickel	9.49 µg/L	5.52 µg/L	5.95 µg/L	6.41 µg/L	5.06 µg/L	7.53 µg/L	12 µg/L	5.15 µg/L	5.4 µg/L	5.46 µg/L	6.98 µg/L	6.98 µg/L	
	1,1,1-Trichloroethane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,1,2,2-Tetrachloroethane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,1,2-Trichloroethane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,1-Dichloroethane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,2-Dichlorobenzene	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	1,2-Dichloroethane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,2-Dichloropropane	ND µg/L			ND µg/L				ND µg/L			ND µg/L		
	1,3-Dichlorobenzene	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	1,4-Dichlorobenzene	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	2,4,6-Trichlorophenol	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	0.24 µg/L	0.375 µg/L	0.22 µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	
	2,4-Dichlorophenol	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	0.29 µg/L	0.15 µg/L	ND µg/L	ND µg/L	ND µg/L	
2,4-Dimethylphenol	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	0.595 µg/L	0.325 µg/L	0.165 µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L		
2,4-Dinitrophenol	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L		
2,4-Dinitrotoluene	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L		

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22		Aug 22		Sep 22		Oct 22		Nov 22		Dec 22		Jan 23		Feb 23		Mar 23		Apr 23		May 23		Jun 23		
		ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
INF-002	2,6-Dinitrotoluene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloronaphthalene	ND	µg/L							ND	µg/L						ND	µg/L						ND	µg/L	
	2-Chlorophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	0.205	µg/L	ND	µg/L	0.09	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloroethylvinylether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		1.57	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Nitrophenol	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthylene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Aldrin	ND	µg/L								ND	µg/L						ND	µg/L						ND	µg/L
	Anthracene	ND	µg/L								ND	µg/L						ND	µg/L						ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L															ND	µg/L							
	Benzo (a) Anthracene	ND	µg/L															ND	µg/L							
	Benzdine	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L								ND	µg/L						ND	µg/L						ND	µg/L
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chlordane	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chrysene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Octyl Phthalate	ND	µg/L															ND	µg/L							
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dieldrin	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Diethylphthalate	4.15	µg/L	4.31	µg/L		2.5	µg/L		3.78	µg/L		2.84	µg/L	4.8	µg/L	3.24	µg/L	3.16	µg/L	2.81	µg/L	2.63	µg/L	3.62	µg/L
	Dimethylphthalate	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endosulfan	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
	Endosulfan I	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L
Endosulfan II	0.82	µg/L	1	µg/L		0.63	µg/L		0.68	µg/L		0.65	µg/L	1.5	µg/L	0.315	µg/L	0.805	µg/L	0.38	µg/L	0.655	µg/L	1.27	µg/L	
Endosulfan Sulfate	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L	
Endrin	ND	µg/L															ND	µg/L								
Fluoranthene	ND	µg/L							ND	µg/L							ND	µg/L						ND	µg/L	

**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	
INF-002	Fluorene	ND	µg/L							ND	µg/L			
	Heptachlor	2.09	µg/L							3.26	µg/L		2.05	
	Hexachlorobenzene	ND	µg/L	ND	µg/L		ND	µg/L		ND	µg/L	ND	µg/L	
	Hexachlorobutadiene	ND	µg/L							ND	µg/L			
	Hexachlorocyclopentadiene	ND	µg/L							ND	µg/L			
	Hexachloroethane	0.58	µg/L	0.66	µg/L	0.56	µg/L	0.45	µg/L	0.62	µg/L	0.835	µg/L	0.705
	Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Isophorone	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Nitrobenzene	ND	µg/L					ND	µg/L					ND
	PCB - 1016	ND	µg/L								ND	µg/L		
	PCB - 1221	1.55	µg/L	6.84	µg/L	1.4	µg/L	1.71	µg/L	1.24	µg/L	1.91	µg/L	0.885
	PCB - 1232	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	PCB - 1242	ND	µg/L											
	PCB - 1248	ND	µg/L								ND	µg/L		
	PCB - 1254	ND	µg/L								ND	µg/L		
	PCB - 1260	ND	µg/L								ND	µg/L		
	Pentachlorophenol	ND	µg/L								ND	µg/L		
	Phenanthrene	ND	µg/L					ND	µg/L		ND	µg/L		
	Phenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Acrolein	ND	µg/L								ND	µg/L		
	Acrylonitrile	ND	µg/L								ND	µg/L		
	Alpha-BHC	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Benzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Beta-BHC	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bis (2-Ethylhexyl) Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bromodichloromethane	ND	µg/L								ND	µg/L		0.91
	Bromoform	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Bromomethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Carbon Tetrachloride	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
	Chlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND
Chloroethane	ND	µg/L								ND	µg/L			
Chloroform	ND	µg/L								ND	µg/L			
cis-1,3-Dichloropropene	ND	µg/L								ND	µg/L			
Delta-BHC	ND	µg/L								ND	µg/L			



**APPENDIX B**  
**PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Monitoring Location	Name	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23											
INF-002	Dibromochloromethane	ND	µg/L							ND	µg/L													
	Ethylbenzene	ND	µg/L							ND	µg/L													
	Gamma-BHC	ND	µg/L							ND	µg/L													
	Methylene Chloride	ND	µg/L							ND	µg/L													
	N-Nitrosodipropylamine	ND	µg/L							ND	µg/L													
	N-Nitrosodimethylamine	ND	µg/L							ND	µg/L													
	N-Nitrosodiphenylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND										
	4,4'-DDD	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND										
	4,4'-DDE	1.8	µg/L	0.5	µg/L	1.8	µg/L	1	µg/L	12.1	µg/L	7.15	µg/L	5.77	µg/L	6.28	µg/L	6.39	µg/L	4.4	µg/L	7.47		
	4,4'-DDT	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND		
	Tetrachloroethene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L			
	Toluene	1.79	µg/L					1.73	µg/L					3.68	µg/L								0.66	µg/L
	trans-1,2-Dichloroethene	ND	µg/L					ND	µg/L					ND	µg/L								ND	µg/L
	trans-1,3-Dichloropropene	ND	µg/L					ND	µg/L					ND	µg/L								ND	µg/L
	Trichloroethene	ND	µg/L					ND	µg/L					ND	µg/L								ND	µg/L
	Vinyl Chloride	ND	µg/L					ND	µg/L					ND	µg/L								ND	µg/L
	2,3,7,8-tetrachlorodibenzo-p-dioxin			ND	pg/L									ND	pg/L								ND	pg/L
	Lead	1.68	µg/L	2.96	µg/L	2.16	µg/L	4.58	µg/L	1.37	µg/L	2.46	µg/L	1.6	µg/L	1.46	µg/L	1.39	µg/L	1.25	µg/L	1.5		
	Antimony	1.04	µg/L	1.1	µg/L	1.14	µg/L	1.35	µg/L	0.83	µg/L	1.23	µg/L	0.99	µg/L	1.1	µg/L	0.89	µg/L	0.755	µg/L	0.96		
	Selenium	12.6	µg/L	13.6	µg/L	12.8	µg/L	13.5	µg/L	18.5	µg/L	12.5	µg/L	11.2	µg/L	10.8	µg/L	9.68	µg/L	9.09	µg/L	7.37		
Thallium	ND	µg/L	ND	µg/L	ND	µg/L	0.84	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND			
Zinc	119	µg/L	109	µg/L	122	µg/L	118	µg/L	114	µg/L	156	µg/L	130	µg/L	108	µg/L	112	µg/L	90	µg/L	113			

Notes:  
 ND non-detect  
 µg/L microgram per liter  
 ng/L nanograms per liter  
 pg/L picograms per liter

## Appendix C. Priority Pollutants

---

**APPENDIX C  
PRIORITY POLLUTANTS LIST  
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

**Elements**

Antimony  
Arsenic  
Beryllium  
Cadmium  
Chromium  
Copper  
Lead  
Mercury  
Nickel  
Selenium  
Silver  
Thallium  
Zinc

**Other Constituents**

Asbestos  
Cyanide

**Pesticides and PCBs  
(EPA Method 608)**

Aldrin  
Alpha-BHC  
Beta-BHC  
Delta-BHC  
Gamma-BHC  
Chlordane  
4,4'-DDD  
4,4'-DDE  
4,4'-DDT  
Dieldrin  
Endosulfan I  
Endosulfan II  
Endosulfan Sulfate  
Endrin  
Endrin Aldehyde  
Heptachlor  
Heptachlor Epoxide  
PCB-1016  
PCB-1221  
PCB-1232  
PCB-1242  
PCB-1248  
PCB-1254  
PCB-1260  
Toxaphene

**Purgeable Organic Compounds  
(EPA Method 624)**

Acrolein  
Acrylonitrile  
Benzene  
Bromomethane  
Bromodichloromethane  
Bromoform  
Carbon Tetrachloride  
Chlorobenzene  
2-Chlorovinylether  
Chloroform  
Chloromethane  
Dibromochloromethane  
1,1-Dichloroethane  
1,2-Dichloroethane  
1,1-Dichloroethene  
Trans-1,2-Dichloroethene  
1,2-Dichloropropane  
Cis-1,3-Dichloropropene  
Trans-1,3-Dichloropropene  
Ethylbenzene  
Methylene Chloride  
1,1,2,2-Tetrachloroethane  
Tetrachloroethene  
1,1,1-Trichloroethane  
1,1,2-Trichloroethane  
Trichloroethene  
Toluene  
Vinyl Chloride

**Base/Neutral Extractable Organic  
Compounds  
(EPA Method 625)**

Acenaphthene  
Acenaphthylene  
Benzidene  
Benzo (a) Anthracene  
Benzo (b) Fluoranthene  
Benzo (k) Fluoranthene  
Benzo (a) Pyrene  
Benzo (g,h,i) Perylene  
Bis (2-Chloroethyl) Ether  
Bis (2-Chloroethoxy) Methane  
Bis (2-Ethylhexyl) Phthalate  
Bis (dichloroisopropyl) Ether  
4-Bromophenyl-Phenyl Ether  
Butyl Benzyl Phthalate

**Base/Neutral Extractable Organic  
Compounds (Continued)**

2-Chloronaphthalene  
4-Chlorophenyl-phenyl Ether  
Chrysene  
Dibenzo (a,h) Anthracene  
Di-N-Butyl Phthalate  
1,3-Dichlorobenzene  
1,4-Dichlorobenzene  
1,2-Dichlorobenzene  
3,3-Dichlorobenzidine  
Diethylphthalate  
Dimethylphthalate  
2,4-Dinitrotoluene  
2,6-Dinitrotoluene  
Di-N-Octyl Phthalate  
1,2-Diphenylhydrazine  
Fluoranthene  
Fluorene  
Hexachlorobenzene  
Hexachlorobutadiene  
Hexachloroethane  
Hexachlorocyclopentadiene  
Indeno (1,2,3-cd) Pyrene  
Isophorone  
Naphthalene  
Nitrobenzene  
N-Nitrosodimethylamine  
N-Nitrosodipropylamine  
N-Nitrosodiphenylamine  
Phenanthrene  
Pyrene  
2,3,7,8-Tetrachlorodibenzo-P-Dioxin  
1,2,4-Trichlorobenzene

**Acid Extractable Organic  
Compounds  
(EPA Method 625)**

4-Chloro-3-Methylphenol  
2-Chlorophenol  
2,4-Dichlorophenol  
2,4-Dimethylphenol  
2,4-Dinitrophenol  
2-Methyl-4,6-Dinitrophenol  
2-Nitrophenol  
4-Nitrophenol  
Pentachlorophenol  
Phenol  
2,4,6-Trichlorophenol

## Appendix D. Fees/Penalties for Noncompliance

**APPENDIX D**  
**FEEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Issue Date	Amount	Item	Enforcement ID
Alloy Tech Electropolishing, Inc.	2/8/2023	725	Notice of Violation	2023-00054680
AlSCO, Inc.	10/4/2022	400	Notice of Violation	2022-00052184
Aluminum Precision Products, Inc. (Susan)	7/26/2022	525	Notice of Violation	2022-00050862
APCT Orange County	12/15/2022	200	Notice of Violation	2022-00053358
APCT Orange County	5/1/2023	400	Notice of Violation	2023-00056270
APCT Orange County	5/2/2023	725	Notice of Violation	2023-00056207
ARO Service	8/30/2022	775	Notice of Violation	2022-00051510
Arrowhead Products Corporation	9/13/2022	774	Notice of Violation	2022-00051772
Arrowhead Products Corporation	10/27/2022	400	Notice of Violation	2022-00052588
Arrowhead Products Corporation	11/1/2022	400	Notice of Violation	2022-00052590
Arrowhead Products Corporation	11/1/2022	400	Notice of Violation	2022-00052591
Arrowhead Products Corporation	11/1/2022	200	Notice of Violation	2022-00052592
Arrowhead Products Corporation	11/1/2022	400	Notice of Violation	2022-00052593
Arrowhead Products Corporation	11/8/2022	400	Notice of Violation	2022-00052754
Arrowhead Products Corporation	1/10/2023	524	Notice of Violation	2022-00053370
B. Braun Medical, Inc. (West/Lake)	7/12/2022	507	Notice of Violation	2022-00050466
B. Braun Medical, Inc. (West/Lake)	1/10/2023	707	Notice of Violation	2022-00053371
Beverage Visions LLC (Anaheim)	7/26/2022	200	Notice of Violation	2022-00050861
Black Oxide Industries, Inc.	12/1/2022	507	Notice of Violation	2022-00053030
Brea Power II, LLC	3/16/2023	707	Notice of Violation	2023-00055138
CalNRG Operating, LLC	1/31/2023	556	Notice of Violation	2023-00054500
Chromadora, Inc.	7/12/2022	1030	Notice of Violation	2022-00050417
Coast to Coast Circuits, Inc.	3/10/2023	400	Notice of Violation	2023-00055334
Coast to Coast Circuits, Inc.	5/2/2023	507	Notice of Violation	2023-00056208
CP-Carrillo, Inc. (McGaw)	7/7/2022	556	Notice of Violation	2022-00050387
CP-Carrillo, Inc. (McGaw)	9/27/2022	400	Notice of Violation	2022-00051983
CP-Carrillo, Inc. (McGaw)	6/1/2023	806	Notice of Violation	2023-00056209
Data Electronic Services, Inc.	12/13/2022	200	Notice of Violation	2022-00052830
Dr. Smoothie Enterprises - DBA Bevolution Group	6/14/2023	707	Notice of Violation	2023-00057145
Dunham Metal Processing	2/8/2023	725	Notice of Violation	2023-00054514
Electrode Technologies, Inc. dba Reid Metal Finishing	9/13/2022	525	Notice of Violation	2022-00051260
Electrode Technologies, Inc. dba Reid Metal Finishing	10/18/2022	725	Notice of Violation	2022-00052344
Electrode Technologies, Inc. dba Reid Metal Finishing	6/22/2023	725	Notice of Violation	2023-00057149
Gold Coast Baking Company, Inc.	12/1/2022	507	Notice of Violation	2022-00053032

**APPENDIX D**  
**FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

Facility	Issue Date	Amount	Item	Enforcement ID
Gold Coast Baking Company, Inc.	3/16/2023	507	Notice of Violation	2023-00055356
Gold Coast Baking Company, Inc.	6/1/2023	200	Notice of Violation	2023-00056036
Gold Coast Baking Company, Inc.	6/22/2023	507	Notice of Violation	2023-00057356
Goodwin Company	12/29/2022	756	Notice of Violation	2022-00053364
Hixson Metal Finishing	9/27/2022	825	Notice of Violation	2022-00052114
IsoTis OrthoBiologics, Inc.	3/16/2023	707	Notice of Violation	2023-00055355
Jellco Container, Inc.	7/21/2022	725	Notice of Violation	2022-00050663
Jellco Container, Inc.	11/8/2022	725	Notice of Violation	2022-00052756
Jellco Container, Inc.	3/16/2023	525	Notice of Violation	2023-00055139
Koia Anaheim Facility, LLC	12/29/2022	707	Notice of Violation	2022-00053365
Koia Anaheim Facility, LLC	6/1/2023	507	Notice of Violation	2023-00056037
Kraft Heinz Company	7/14/2022	507	Notice of Violation	2022-00050510
Kraft Heinz Company	8/4/2022	200	Notice of Violation	2022-00051074
Linco Industries, Inc.	4/13/2023	400	Notice of Violation	2023-00055523
Linco Industries, Inc.	4/14/2023	400	Notice of Violation	2023-00055930
Logi Graphics, Inc.	7/26/2022	200	Notice of Violation	2022-00050672
Merical, LLC	6/1/2023	725	Notice of Violation	2023-00056010
Newport Corporation	3/30/2023	507	Notice of Violation	2023-00055827
Pulmuone Foods USA, Inc. (East)	9/13/2022	507	Notice of Violation	2022-00051744
Q-Flex Inc.	12/1/2022	725	Notice of Violation	2022-00053034
Santana Services	2/2/2023	400	Notice of Violation	2023-00054559
Shepard Bros., Inc.	5/2/2023	756	Notice of Violation	2023-00056206
Sioux Honey Association	6/1/2023	707	Notice of Violation	2023-00056908
South Coast Baking, LLC	12/1/2022	507	Notice of Violation	2022-00053035
Star Manufacturing LLC, dba Commercial Metal Forming	10/25/2022	756	Notice of Violation	2022-00052536
Statek Corporation (Orange Grove)	8/30/2022	507	Notice of Violation	2022-00051515
Stepan Company	5/24/2023	830	Notice of Violation	2023-00056649
Superior Connector Plating, Inc.	11/8/2022	725	Notice of Violation	2022-00052757
Superior Processing (2)	1/12/2023	400	Notice of Violation	2023-00054070
Thermal-Vac Technology, Inc.	9/22/2022	200	Notice of Violation	2022-00051968
Thompson Energy Resources, LLC (Brea)	7/21/2022	200	Notice of Violation	2022-00050664
TTM Technologies North America, LLC. (Coronado)	7/12/2022	725	Notice of Violation	2022-00050144
Van Law Food Products, Inc.	12/29/2022	707	Notice of Violation	2022-00053741
Vi-Cal Metals, Inc.	5/2/2023	556	Notice of Violation	2023-00056210

**APPENDIX D**  
**FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION**

<b>Facility</b>	<b>Issue Date</b>	<b>Amount</b>	<b>Item</b>	<b>Enforcement ID</b>
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	10/25/2022	544	Notice of Violation	2022-00052541
Weber Precision Graphics	1/10/2023	725	Notice of Violation	2023-00054049

## Appendix E. Public Notice of Significantly Noncompliant Industries

---



THE ORANGE COUNTY REGISTER Register  
 1920 Main Street, Suite 209  
 Irvine, California 92614  
 (714) 796-7000

0011630846

Orange County Sanitation District  
 10844 Ellis Avenue  
 Fountain Valley, California 92708

**PROOF OF PUBLICATION  
 (2015.5 C.C.P.)**

**STATE OF CALIFORNIA  
 County of Orange**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Orange County Register, a newspaper of general circulation, printed and published in the City of Irvine\*, County of Orange, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of County of Orange, State of California, under the date of November 19, 1905, Case No.A-21046. The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

**10/30/2023**

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Irvine, California

On this 30th day of October, 2023.

*Jandra Campos*  
 Signature

**PUBLIC NOTICE**

In accordance with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards and as defined by 40 CFR 403.8(f)(2)(vii), the Orange County Sanitation District (OC San) is hereby publishing the following list of permittees who, during July 1, 2022 through June 30, 2023, were identified as industries in significant noncompliance with wastewater discharge standards. An industry in significant noncompliance is defined as follows:

- Chronic violations of discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits.
- Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(i) multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement, (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW ("Publicly Owned Treatment Works," which in this case is OC San) determines has caused, alone or in combination with other discharges, interference or Pass Through (including endangering the health of POTW personnel or the general public).
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

OC San has taken enforcement action against these permittees. In response, permittees are required to identify and implement corrective actions to maintain long-term compliance with wastewater discharge regulations and permit limits.

Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2022/23 Orange County Sanitation District			
Company Name	Permit No.	Category	City
<b>Industries SNC Due to Discharge Violations</b>			
Arrowhead Products Corporation	1-031137	Iron And Steel Manufacturing, Nonferrous Metals Forming and Metal Powders	Los Alamitos
CP-Carrillo, Inc. (McGaw)	1-571316	OC San Local Limits	Irvine
Hightower Plating & Manufacturing Co.	1-021185	Metal Finishing	Orange
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
Weber Precision Graphics	1-011354	OC San Local Limits	Santa Ana
<b>Industries SNC Due to Reporting Violations</b>			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Auto-Chlor System of Washington, Inc.	1-511384	Soap and Detergent Manufacturing	Santa Ana
Bioduro LLC (Fairbanks)	1-601616	Pharmaceutical Manufacturing	Irvine
Bioduro LLC (Jerolimiro)	1-601617	Pharmaceutical Manufacturing	Irvine
Bodycote Thermal Processing	1-031120	OC San Local Limits	Westminster
Brea Power II, LLC	1-521837	OC San Local Limits	Brea
Coast to Coast Circuits, Inc.	1-111129	Metal Finishing	Huntington Beach
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
Fabrication Concepts Corporation	1-011068	Metal Finishing	Santa Ana
Gold Coast Baking Company, Inc.	1-601700	OC San Local Limits	Santa Ana
Hartwell Corporation	1-021381	OC San Local Limits	Placentia
Kraft Heinz Company	1-071056	OC San Local Limits	Irvine
Logi Graphics, Inc.	1-031049	Metal Finishing	Huntington Beach
Manufactured Packaging Products	1-521793	OC San Local Limits	Brea
Markland Manufacturing, Inc.	1-011046	Metal Finishing	Santa Ana
Master Wash, Inc.	1-511399	OC San Local Limits	Santa Ana
Nobel Biocare USA, LLC	1-521801	Metal Finishing	Yorba Linda
O'Donnell Oil, LLC	1-581191	Oil and Gas Extraction	Huntington Beach
Only Creations for Pets (Stanton)	1-601085	OC San Local Limits	Stanton
Pacific Western Container	1-511371	OC San Local Limits	Santa Ana
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim
Soldemask, Inc.	1-031341	Metal Finishing	Huntington Beach
Thompson Energy Resources, LLC (Brea)	1-601469	Oil and Gas Extraction	Brea
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim
<b>Industries SNC Due to Discharge and Reporting Violations</b>			
Mertical, LLC	1-600555	Pharmaceutical Manufacturing	Orange
Shepard Bros., Inc.	1-031034	Soap and Detergent Manufacturing	La Habra

**The Orange County Register  
 Published: 10/30/23**

## Appendix F. Acknowledgements

---

**APPENDIX F**

**ACKNOWLEDGEMENTS**

The Resource Protection Division of the Orange County Sanitation District wishes to acknowledge the following people for their contributions to this report:

**OC San Resource Protection Division**

- Mark Kawamoto ..... Reviewer/Writer/Signatory, Environmental Protection Manager
- Jason Daniel ..... Reviewer/Writer, Engineering Supervisor
- Jonathon Powell..... Reviewer/Writer, Environmental Supervisor
- Mike Zedek..... Reviewer/Writer, Engineering Supervisor
- Melissa Soriano..... Report Coordinator/Writer, Sr. Environmental Specialist
- Bryce Dragan ..... Writer, Pr. Environmental Specialist
- Lazaro Eleuterio ..... Writer, Engineer
- Brian Finkelstein..... Writer, Engineer
- Paul Gabot ..... Writer, Associate Engineer
- Kiran Kaur ..... Writer, Sr. Engineer
- Lori McKinley..... Writer, Pr. Environmental Specialist
- Mi Nguyen ..... Writer, Engineer
- Kevin Nugent..... Writer, Associate Engineer
- Adrian Siew ..... Writer, Associate Engineer
- Stephanie Shamblin Gray ..... Writer, Engineer
- Brian Swenson ..... Writer, Engineer

**OC San Public Affairs, Laboratory, Monitoring and Compliance, Operations, and Financial Management Staff**

- Dindo Carrillo ..... Writer, Regulatory Specialist
- Pragathi Chandupatla ..... Writer, Sr. Information Tech Analyst
- Gregg Deterding..... Cover Design, Graphics Designer
- Robert Gamber ..... Writer, Sr. Environmental Specialist
- Matthew Garchow ..... Analytical Data/Appendices, Pr. Information Tech Analyst
- Jackie Lerma..... Writer, Associate Engineer
- Peter Park ..... Writer, Associate Engineer
- Shallee Milligan Riley ..... Writing, Accounting Supervisor
- Matthew Smith ..... Writer, Sr. Regulatory Specialist
- Reza Sobhani..... Writer, Engineer
- Cristina Stanford ..... Writer, Pr. Accountant
- Danny Tang..... Environmental Supervisor
- Cindy Vellucci..... Writer, Sr. Environmental Specialist



**External Contributors**

Michael Barber ..... Data Preparation, Senior Pretreatment & Source Control Inspector, IEUA  
Arif Baseer.....Data Preparation, Source Control Specialist II, Western Water  
Marce Billings .....Data Preparation, Source Control Supervisor, JCSD  
Benjamin Burgett..... Data Preparation, Source Control Program Manager, Western Water  
Andy Coady..... Data Preparation, Environmental Control Officer, SBMWD  
Elizabeth Duarte..... Writer/Data Preparation, Executive Secretary, IRWD  
Elizabeth Mui ..... Data Preparation, Student Intern, IRWD  
Gary Ethridge .....Data Preparation, Pretreatment Program Coordinator, SBVMWD  
Lucas Gilbert .....Writer/Reviewer, Manager of Permitting and Pretreatment, SAWPA  
Jeffrey Mosher ..... General Manager, SAWPA  
David Ruhl.....Reviewer, Executive Manager of Engineering and Operations, SAWPA  
Sonya San Juan.....iPACS and Agency Coordination/Data Preparation, Business Analyst, SAWPA  
Alfredo Vasquez .....Writer/Data Preparation, Pretreatment Program Specialist, SAWPA  
Isabel Melendez ..... Writer/Reviewer, Regulatory Compliance Scientist, IRWD  
Scott Giatpaiboon ..... Data Preparation, Water Quality Manager, IRWD  
Jim Colston..... Writer/Reviewer, Director of Water Quality & Regulatory Compliance, IRWD  
Ken Tam..... Data Preparation, Manager of Environmental Services, SAWPA  
David Trujillo .....Data Preparation, Source Control Manager, EMWD

## Appendix G. Irvine Ranch Water District (IRWD) Sampling

## APPENDIX G

### 2022/23 Irvine Ranch Water District (IRWD) Quarterly Priority Pollutant Monitoring

Sampling is performed quarterly by Regulatory Compliance personnel on the influent, effluent, and sludge. The results for MWRP influent, effluent, and sludge are shown in this appendix. Two types of sampling are performed:

1. Grab samples are collected at each location for Volatile Organic Priority Pollutants and cyanide.
2. Composite samples are collected for Base/Neutrals and Acid Extractables, Inorganic Priority Pollutants, Pesticides/Polychlorinated Biphenyls at each location. This sampling is performed with an automatic sampler that collects discrete, flow-paced samples over a 24-hour period. The composite samples are collected in 5-gallon glass bottles, and then distributed out into the appropriate glass or plastic bottle for preservation and storage.

The collection points for the samples are as follows:

- Influent: Collected at headworks before grit basins.
- Effluent: Collected at the end of the chlorine contact basin (CCB) but downstream of where the CCB effluent and ultraviolet (UV) disinfected effluent are combined, just prior to entering the recycled water distribution system.
- Sludge: Collected at the flow meter vault on the MPS-3 force main.

Samples are submitted to the IRWD Water Quality Laboratory where they are analyzed in-house or contracted to either Weck Laboratories located in the City of Industry, or Eurofins Test America Laboratory located in the City of Irvine. Collected samples are preserved, refrigerated, and shipped on ice as required to the specific lab for analysis. Each lab supplies their respective sample containers with the preservatives as required by the method.

The reporting detection limits shown in the results are the limits for that particular sample. The reporting detection limit may vary from the laboratory and from sample to sample based on QA/QC analysis and the degree of sample dilution.

**APPENDIX G**  
**SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, EFFLUENT AND SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/6/22-9/13/22	10/5/22-12/28/22	1/11/23-3/8/23	4/4/23-6/13/23	2022-2023	2021-2022	
<b>INFLUENT</b>							
Antimony	0.752	0.529	0.594	0.507	0.596	0.48	0.50
Arsenic	3.09	2.77	2.94	2.09	2.72	2.48	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	0.285	ND	ND	ND	0.071	0.11	0.25
Chromium	2.75	1.61	4.25	2.07	2.67	1.22	0.50
Copper	134	120	45.6	37.6	84.3	51.4	0.50
Lead	1.36	1.04	1.06	0.776	1.06	0.65	0.50
Mercury	0.0182	ND	0.0135	0.0352	0.0167	0.02	0.01
Nickel	4.28	3.17	4.72	3.18	3.84	2.90	0.50
Selenium	2.26	1.83	2.26	2.13	2.12	2.19	0.50
Silver	0.602	0.313	0.667	0.249	0.458	0.23	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	9.7	89	25	66	47.4	17.0	5.00
Zinc	221	145	146	140	163	128	0.50
<b>EFFLUENT</b>							
Antimony	ND	ND	ND	ND	ND	0.41	0.50
Arsenic	2.03	2.19	1.84	1.90	1.99	1.96	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	ND	ND	ND	ND	ND	0.01	0.25
Chromium	ND	ND	0.722	0.495	0.304	0.67	0.50
Copper	4.84	3.41	3.53	3.65	3.86	4.39	0.50
Lead	ND	ND	ND	ND	ND	0.06	0.50
Mercury	ND	ND	ND	ND	ND	0.00	0.01
Nickel	2.03	1.88	2.30	1.63	1.96	2.10	0.50
Selenium	1.14	1.15	1.40	1.44	1.28	1.40	0.50
Silver	ND	ND	ND	0.116	0.029	ND	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	ND	1.00	1.21	1.30	0.878	ND	5.00
Zinc	43.4	34.9	36.7	53.1	42.0	59.0	0.50
<b>SLUDGE</b>							
Antimony	NA	NA	NA	NA	NA	3.40	10.00
Arsenic	NA	NA	NA	NA	NA	9.71	20.00
Beryllium	NA	NA	NA	NA	NA	ND	10.00
Cadmium	NA	NA	NA	NA	NA	1.92	5.00
Chromium	NA	NA	NA	NA	NA	195	10.00
Copper	NA	NA	NA	NA	NA	1311	10.00
Lead	NA	NA	NA	NA	NA	15.4	10.00

**APPENDIX G**  
**SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, EFFLUENT AND SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/6/22-9/13/22	10/5/22-12/28/22	1/11/23-3/8/23	4/4/23-6/13/23	2022-2023	2021-2022	
Mercury	NA	NA	NA	NA	NA	0.28	0.01
Nickel	NA	NA	NA	NA	NA	137	10.00
Selenium	NA	NA	NA	NA	NA	8.81	10.00
Silver	NA	NA	NA	NA	NA	4.35	5.00
Thallium	NA	NA	NA	NA	NA	ND	20.00
Total Cyanide	NA	NA	NA	NA	NA	ND	100.00
Zinc	NA	NA	NA	NA	NA	1619	10.00

ML method quantitation limit, results below the ML are reported as ND  
ND non-detect  
NA not analyzed  
µg/L microgram per liter  
\* estimated concentration



**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/25/22	10/5/22	1/11/23- 2/15/23	4/4/23- 4/17/23	2022-2023	2021-2022	
<b>VOLATILE PRIORITY POLLUTANTS</b>							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	ND	ND	ND	ND	ND	0.29	0.50
Bromoform	ND	ND	ND	ND	ND	0.13	0.50
Bromomethane	ND	ND	ND	ND	ND	ND	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	1.27	1.34	0.85	1.05	1.13	1.03	0.50
Chloromethane	ND	ND	ND	ND	ND	ND	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	ND	ND	ND	ND	ND	0.34	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	ND	ND	ND	0.12	2.00
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.50
Toluene	1.35	0.64	0.61	0.97	0.89	0.64	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Trichloroethylene	ND	ND	ND	ND	ND	0.04	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
<b>Other Organic Priority Pollutants</b>							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	87.3	73.3	214	194	142	222	2.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/25/22	10/5/22	1/11/23- 2/15/23	4/4/23- 4/17/23	2022-2023	2021-2022	
Carbon disulfide	ND	0.51	ND	ND	0.51	0.60	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	2.41	2.09	ND	2.08	1.65	1.62	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	ND	ND	ND	ND	0.42	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
<b>BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS</b>							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	10.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	5.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	10.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	25.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	10.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	10.00
Acenaphthene	ND	ND	ND	ND	ND	ND	5.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	10.00
Anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzidine	ND	ND	ND	ND	ND	ND	25.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	10.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	20.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	5.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	25.00
Butyl benzyl phthalate	ND	ND	ND	ND	ND	1.53	10.00
Chrysene	ND	ND	ND	ND	ND	ND	10.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	20.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	10.00
Fluoranthene	ND	ND	ND	ND	ND	ND	5.00
Fluorene	ND	ND	ND	ND	ND	ND	10.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/25/22	10/5/22	1/11/23- 2/15/23	4/4/23- 4/17/23	2022-2023	2021-2022	
Hexachlorobenzene	ND	ND	ND	ND	ND	2.04	5.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	5.00
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	25.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	5.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	20.00
Isophorone	ND	ND	ND	ND	ND	ND	5.00
Naphthalene	ND	ND	ND	ND	ND	ND	5.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	5.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	10.00
N-Nitrosodi-n-propylamine	ND	ND	ND	NA	ND	ND	10.00
N-Nitrosodiphenylamine	7.70	ND	ND	NA	2.57	ND	5.00
Phenanthrene	ND	ND	ND	ND	ND	ND	10.00
Pyrene	ND	ND	ND	ND	ND	ND	10.00
<b>ACID EXTRACTABLE PRIORITY POLLUTANTS</b>							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	25.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	10.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	10.00
4,6-Dinitro-o-cresol	NA	NA	NA	NA	NA	ND	25.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	50.00
p-Chloro-m-cresol	NA	NA	NA	NA	NA	ND	5.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	10.00
Phenol	ND	12.0	ND	ND	3.00	6.85	5.00
<b>BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES</b>							
2,4,5-Trichlorophenol	ND	ND	NA	NA	ND	ND	25.00
2-Methylnaphthalene	ND	ND	NA	NA	ND	ND	10.00
2-Methylphenol	ND	ND	NA	NA	ND	ND	25.00
2-Nitroaniline	ND	ND	NA	NA	ND	NA	10.00
3-Nitroaniline	ND	ND	NA	NA	ND	NA	10.00
4-Chloroaniline	ND	ND	NA	NA	ND	NA	10.00
3&4-Methylphenol	48	44	NA	NA	46	26.5	5.00
4-Nitroaniline	ND	ND	NA	NA	ND	NA	10.00
Aniline	ND	ND	NA	NA	ND	NA	10.00
Benzoic acid	ND	ND	NA	NA	ND	ND	10.00
Benzyl alcohol	36	34	NA	NA	35	27.5	10.00
Dibenzofuran	ND	ND	NA	NA	ND	ND	10.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**INFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/25/22	10/5/22	1/11/23- 2/15/23	4/4/23- 4/17/23	2022-2023	2021-2022	
<b>PRIORITY POLLUTANT PESTICIDES</b>							
4,4'-DDD	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDE	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	NA	NA	NA	NA	NA	ND	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method quantitation limit, results below the ML are reported as ND  
ND non-detect  
NA not analyzed  
µg/L microgram per liter  
\* estimated concentration

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**FINAL EFFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/12/22-9/13/22	10/5/22-12/28/22	1/11/23-3/29/23	4/17/23-6/13/23	2022-2023	2021-2022	
<b>VOLATILE PRIORITY POLLUTANTS</b>							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	25.9	21.7	25.1	23.6	24.1	23.0	0.50
Bromoform	ND	ND	ND	ND	ND	0.42	0.50
Bromomethane	ND	ND	ND	ND	ND	0.04	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	103	101	70.6	75.7	87.6	92.2	0.50
Chloromethane	ND	ND	ND	ND	ND	0.14	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	7.58	5.88	4.62	5.92	6.00	6.46	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	ND	ND	ND	ND	2.00
Tetrachloroethene	ND	ND	ND	ND	ND	0.07	0.50
Toluene	ND	ND	ND	ND	ND	0.09	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	0.10	0.50
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
<b>VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES</b>							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	5.68	2.38	ND	ND	2.02	2.71	2.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**FINAL EFFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/12/22-9/13/22	10/5/22-12/28/22	1/11/23-3/29/23	4/17/23-6/13/23	2022-2023	2021-2022	
Carbon disulfide	ND	ND	ND	ND	ND	ND	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	ND	ND	ND	ND	ND	ND	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	ND	ND	ND	ND	ND	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
<b>BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS</b>							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	2.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	1.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	2.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	5.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	2.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	2.00
Acenaphthene	ND	ND	ND	ND	ND	ND	1.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	2.00
Anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzidine	ND	ND	ND	ND	ND	ND	5.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	2.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	4.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	1.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Ethylhexyl) phthalate	ND	12.0	11.0	ND	5.75	ND	5.00
Butyl benzyl phthalate	ND	ND	ND	ND	ND	0.14	2.00
Chrysene	ND	ND	ND	ND	ND	ND	2.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	4.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	2.00
Fluoranthene	ND	ND	ND	ND	ND	ND	1.00
Fluorene	ND	ND	ND	ND	ND	ND	2.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**FINAL EFFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/12/22-9/13/22	10/5/22-12/28/22	1/11/23-3/29/23	4/17/23-6/13/23	2022-2023	2021-2022	
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	0.12	5.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	1.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	4.00
Isophorone	ND	ND	ND	ND	ND	ND	1.00
Naphthalene	ND	ND	ND	ND	ND	ND	1.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	1.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	2.00
N-Nitrosodi-n-propylamine	ND	ND	ND	NA	ND	ND	2.00
N-Nitrosodiphenylamine	ND	ND	ND	NA	ND	ND	1.00
Phenanthrene	ND	ND	ND	ND	ND	ND	2.00
Pyrene	ND	ND	ND	ND	ND	ND	2.00
<b>ACID EXTRACTABLE PRIORITY POLLUTANTS</b>							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	5.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	2.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	2.00
4,6-Dinitro-o-cresol	NA	NA	NA	NA	NA	ND	5.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	10.00
p-Chloro-m-cresol	NA	NA	NA	NA	NA	ND	1.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	2.00
Phenol	ND	ND	ND	ND	ND	ND	1.00
<b>BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES</b>							
2,4,5-Trichlorophenol	ND	ND	ND	NA	ND	ND	5.00
2-Methylnaphthalene	ND	ND	ND	NA	ND	ND	1.00
2-Methylphenol	ND	ND	ND	NA	ND	ND	5.00
2-Nitroaniline	ND	ND	ND	NA	ND	NA	1.00
3-Nitroaniline	ND	ND	ND	NA	ND	NA	1.00
4-Chloroaniline	ND	ND	ND	NA	ND	NA	1.00
3&4-Methylphenol	ND	ND	ND	NA	ND	NA	1.00
4-Nitroaniline	ND	ND	ND	NA	ND	NA	10.00
Aniline	ND	ND	ND	NA	ND	NA	1.00
Benzoic acid	ND	ND	ND	NA	ND	ND	1.00
Benzyl alcohol	ND	ND	ND	NA	ND	ND	1.00
Dibenzofuran	ND	ND	ND	NA	ND	ND	1.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**FINAL EFFLUENT, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/12/22-9/13/22	10/5/22-12/28/22	1/11/23-3/29/23	4/17/23-6/13/23	2022-2023	2021-2022	
<b>PRIORITY POLLUTANT PESTICIDES</b>							
4,4'-DDD	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDE	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	NA	NA	NA	NA	NA	ND	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method quantitation limit, results below the ML are reported as ND  
ND non-detect  
NA not analyzed  
µg/L microgram per liter  
\* estimated concentration



**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date					2022-2023	2021-2022	
<b>VOLATILE PRIORITY POLLUTANTS</b>							
1,1,1-Trichloroethane	NA	NA	NA	NA	NA	ND	12.50
1,1,2,2-Tetrachloroethane	NA	NA	NA	NA	NA	ND	12.50
1,1,2-Trichloroethane	NA	NA	NA	NA	NA	ND	12.50
1,1-Dichloroethane	NA	NA	NA	NA	NA	ND	12.50
1,1-Dichloroethene	NA	NA	NA	NA	NA	ND	12.50
1,2-Dichlorobenzene	NA	NA	NA	NA	NA	ND	12.50
1,2-Dichloroethane	NA	NA	NA	NA	NA	ND	12.50
1,2-Dichloropropane	NA	NA	NA	NA	NA	ND	12.50
1,3-Dichlorobenzene	NA	NA	NA	NA	NA	ND	12.50
1,4-Dichlorobenzene	NA	NA	NA	NA	NA	ND	12.50
Acrolein	NA	NA	NA	NA	NA	ND	125.00
Acrylonitrile	NA	NA	NA	NA	NA	ND	50.00
Benzene	NA	NA	NA	NA	NA	ND	12.50
Bromodichloromethane	NA	NA	NA	NA	NA	ND	12.50
Bromoform	NA	NA	NA	NA	NA	ND	12.50
Bromomethane	NA	NA	NA	NA	NA	ND	12.50
Carbon tetrachloride	NA	NA	NA	NA	NA	ND	12.50
Chlorobenzene	NA	NA	NA	NA	NA	ND	12.50
Chloroethane	NA	NA	NA	NA	NA	ND	12.50
Chloroform	NA	NA	NA	NA	NA	ND	12.50
Chloromethane	NA	NA	NA	NA	NA	ND	12.50
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	ND	12.50
cis-1,3-Dichloropropene	NA	NA	NA	NA	NA	ND	12.50
Dibromochloromethane	NA	NA	NA	NA	NA	ND	12.50
Ethylbenzene	NA	NA	NA	NA	NA	ND	12.50
Methylene chloride	NA	NA	NA	NA	NA	ND	50.00
Tetrachloroethene	NA	NA	NA	NA	NA	ND	12.50
Toluene	NA	NA	NA	NA	NA	15.8	12.50
trans-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	12.50
trans-1,3-Dichloropropene	NA	NA	NA	NA	NA	NA	12.50
Trichloroethylene	NA	NA	NA	NA	NA	ND	12.50
Trichlorofluoromethane	NA	NA	NA	NA	NA	ND	12.50
Vinyl chloride	NA	NA	NA	NA	NA	ND	12.50
<b>VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES</b>							
2-Hexanone	NA	NA	NA	NA	NA	ND	250.00
4-Methyl-2-pentanone	NA	NA	NA	NA	NA	ND	250.00
Acetone	NA	NA	NA	NA	NA	212	125.00
Carbon disulfide	NA	NA	NA	NA	NA	ND	25.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date					2022-2023	2021-2022	
m+p-Xylenes	NA	NA	NA	NA	NA	ND	25.00
Methyl ethyl ketone	NA	NA	NA	NA	NA	ND	50.00
o-Xylene	NA	NA	NA	NA	NA	ND	12.50
Styrene	NA	NA	NA	NA	NA	ND	12.50
Tetrahydrofuran	NA	NA	NA	NA	NA	ND	250.00
Vinyl acetate	NA	NA	NA	NA	NA	ND	250.00
<b>BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS</b>							
1,2,4-Trichlorobenzene	NA	NA	NA	NA	NA	ND	400.00
1,2-Diphenylhydrazine	NA	NA	NA	NA	NA	ND	200.00
2,4-Dinitrotoluene	NA	NA	NA	NA	NA	ND	400.00
2,6-Dinitrotoluene	NA	NA	NA	NA	NA	ND	400.00
2-Chloronaphthalene	NA	NA	NA	NA	NA	ND	400.00
3,3'-Dichlorobenzidine	NA	NA	NA	NA	NA	ND	1000.00
4-Bromophenyl phenyl	NA	NA	NA	NA	NA	ND	400.00
4-Chlorophenyl phenyl ether	NA	NA	NA	NA	NA	ND	400.00
Acenaphthene	NA	NA	NA	NA	NA	ND	200.00
Acenaphthylene	NA	NA	NA	NA	NA	ND	400.00
Anthracene	NA	NA	NA	NA	NA	ND	400.00
Benzidine	NA	NA	NA	NA	NA	ND	1000.00
Benzo(a)anthracene	NA	NA	NA	NA	NA	ND	400.00
Benzo(a)pyrene	NA	NA	NA	NA	NA	ND	400.00
Benzo(b)fluoranthene	NA	NA	NA	NA	NA	ND	400.00
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	ND	800.00
Benzo(k)fluoranthene	NA	NA	NA	NA	NA	ND	400.00
Bis(2-chloroethoxy)methane	NA	NA	NA	NA	NA	ND	400.00
Bis(2-Chloroethyl) ether	NA	NA	NA	NA	NA	ND	200.00
Bis(2-Chloroisopropyl) ether	NA	NA	NA	NA	NA	ND	400.00
Bis(2-Ethylhexyl) phthalate	NA	NA	NA	NA	NA	ND	1000.00
Butyl benzyl phthalate	NA	NA	NA	NA	NA	ND	400.00
Chrysene	NA	NA	NA	NA	NA	ND	400.00
Dibenzo(a,h)anthracene	NA	NA	NA	NA	NA	ND	800.00
Diethyl phthalate	NA	NA	NA	NA	NA	ND	400.00
Dimethyl phthalate	NA	NA	NA	NA	NA	ND	400.00
Di-N-Butylphthalate	NA	NA	NA	NA	NA	ND	400.00
Di-N-Octylphthalate	NA	NA	NA	NA	NA	ND	400.00
Fluoranthene	NA	NA	NA	NA	NA	ND	200.00
Fluorene	NA	NA	NA	NA	NA	ND	400.00
Hexachlorobenzene	NA	NA	NA	NA	NA	ND	200.00
Hexachlorobutadiene	NA	NA	NA	NA	NA	ND	200.00

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date					2022-2023	2021-2022	
Hexachlorocyclopentadiene	NA	NA	NA	NA	NA	ND	1000.00
Hexachloroethane	NA	NA	NA	NA	NA	ND	200.00
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA	NA	ND	800.00
Isophorone	NA	NA	NA	NA	NA	ND	200.00
Naphthalene	NA	NA	NA	NA	NA	ND	200.00
Nitrobenzene	NA	NA	NA	NA	NA	ND	200.00
N-Nitrosodimethylamine	NA	NA	NA	NA	NA	ND	400.00
N-Nitrosodi-n-propylamine	NA	NA	NA	NA	NA	ND	400.00
N-Nitrosodiphenylamine	NA	NA	NA	NA	NA	ND	200.00
Phenanthrene	NA	NA	NA	NA	NA	ND	400.00
Pyrene	NA	NA	NA	NA	NA	ND	400.00
<b>ACID EXTRACTABLE PRIORITY POLLUTANTS</b>							
2,4,6-Trichlorophenol	NA	NA	NA	NA	NA	ND	400.00
2,4-Dichlorophenol	NA	NA	NA	NA	NA	ND	400.00
2,4-Dimethylphenol	NA	NA	NA	NA	NA	ND	400.00
2,4-Dinitrophenol	NA	NA	NA	NA	NA	ND	1000.00
2-Chlorophenol	NA	NA	NA	NA	NA	ND	400.00
2-Nitrophenol	NA	NA	NA	NA	NA	ND	400.00
4,6-Dinitro-o-cresol	NA	NA	NA	NA	NA	ND	1000.00
4-Nitrophenol	NA	NA	NA	NA	NA	ND	2000.00
p-Chloro-m-cresol	NA	NA	NA	NA	NA	ND	200.00
Pentachlorophenol	NA	NA	NA	NA	NA	ND	400.00
Phenol	NA	NA	NA	NA	NA	ND	200.00
<b>BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES</b>							
2,4,5-Trichlorophenol	NA	NA	NA	NA	NA	ND	1000.00
2-Methylnaphthalene	NA	NA	NA	NA	NA	NA	NA
2-Methylphenol	NA	NA	NA	NA	NA	ND	1000.00
2-Nitroaniline	NA	NA	NA	NA	NA	NA	10.00
3-Nitroaniline	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	NA	NA	NA	NA	NA	NA	NA
3&4-Methylphenol	NA	NA	NA	NA	NA	365	200.00
4-Nitroaniline	NA	NA	NA	NA	NA	NA	NA
Aniline	NA	NA	NA	NA	NA	NA	NA
Benzoic acid	NA	NA	NA	NA	NA	NA	NA
Benzyl alcohol	NA	NA	NA	NA	NA	NA	NA
Dibenzofuran	NA	NA	NA	NA	NA	NA	NA
<b>PRIORITY POLLUTANT PESTICIDES</b>							
4,4'-DDD	NA	NA	NA	NA	NA	ND	0.05
4,4'-DDE	NA	NA	NA	NA	NA	ND	0.05

**APPENDIX G**  
**SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES**  
**SLUDGE, FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT (IRWD)**  
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date					2022-2023	2021-2022	
4,4'-DDT	NA	NA	NA	NA	NA	ND	0.02
Aldrin	NA	NA	NA	NA	NA	ND	0.01
Alpha-BHC	NA	NA	NA	NA	NA	ND	0.02
Beta-BHC	NA	NA	NA	NA	NA	ND	0.02
Chlordane	NA	NA	NA	NA	NA	ND	1.00
Delta-BHC	NA	NA	NA	NA	NA	ND	0.02
Dieldrin	NA	NA	NA	NA	NA	ND	0.04
Endosulfan sulfate	NA	NA	NA	NA	NA	ND	0.05
Endosulfan-I	NA	NA	NA	NA	NA	ND	0.04
Endosulfan-II	NA	NA	NA	NA	NA	ND	0.02
Endrin	NA	NA	NA	NA	NA	ND	0.04
Endrin aldehyde	NA	NA	NA	NA	NA	ND	0.02
Heptachlor	NA	NA	NA	NA	NA	ND	0.04
Heptachlor epoxide	NA	NA	NA	NA	NA	ND	0.02
Lindane	NA	NA	NA	NA	NA	ND	0.04
Methoxychlor	NA	NA	NA	NA	NA	ND	0.05
PCB-1016	NA	NA	NA	NA	NA	ND	3.00
PCB-1221	NA	NA	NA	NA	NA	ND	3.00
PCB-1232	NA	NA	NA	NA	NA	ND	3.00
PCB-1242	NA	NA	NA	NA	NA	ND	3.00
PCB-1248	NA	NA	NA	NA	NA	ND	3.00
PCB-1254	NA	NA	NA	NA	NA	ND	3.00
PCB-1260	NA	NA	NA	NA	NA	ND	3.00
Toxaphene	NA	NA	NA	NA	NA	ND	5.00

ML method quantitation limit, results below the ML are reported as ND  
ND non-detect  
NA not analyzed  
µg/L microgram per liter  
\* estimated concentration

**APPENDIX G**  
**SUMMARY OF TOTAL DISSOLVED SOLIDS**  
**EFFLUENT FY 2022-2023**  
**MICHELSON WATER RECYCLING PLANT**  
(all test results in mg/L except as noted)

Quarter	1	2	3	4	Average	Average	
Sample Date					2022-2023	2021-2022	
TDS	663	662	687	615	657	631	

ML method quantitation limit, results below the ML are reported as ND  
ND non-detect  
NA not analyzed  
mg/L milligram per liter

Appendix H. Santa Ana Watershed Project Authority  
(SAWPA) Reports, Data, SNC Notice

---



# Santa Ana Watershed Project Authority

OVER 50 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

August 25, 2023

Ms. Melissa Soriano  
Senior Environmental Specialist  
Environmental Compliance  
Orange County Sanitation District  
10844 Ellis Avenue  
Fountain Valley, CA 92708-7018

**Subject: Annual Report, Inland Empire Brine Line (FY 2022 – 2023)**

Dear Ms. Soriano:

This annual report, including Chapter 7.4, Appendix F – Acknowledgements, and Appendix H – List of SIUs with Monitoring Compliance Status and Permittees with Pretreatment Equipment, has been prepared in the format provided by OC San. Additionally, supplemental information previously requested by OC San during annual report submittals, Appendix J – Monitoring and Compliance Status Report and Water Quality Data for the reporting period has also been developed. Information has been provided from SAWPA and its member/contract agencies: the City of Beaumont (Beaumont), Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), San Bernardino Valley Municipal Water District (Valley District), Western Municipal Water District (WMWD), and Yucaipa Valley Water District (YVWD).

1. Significant Noncompliance Publication.

One Public Notice was posted on August 21, 2023, listing the one (1) permittee who was in Significant Noncompliance during the period of July 1, 2022, through June 30, 2023. A copy of the proof of publication from the Press Enterprise is attached to this report.

2. Reporting Clarification.

The November 2, 2022, Monitoring Data for OLS Energy - Chino indicates a detectable level for the constituent of Total Toxic Organics (TTOs). However, additional data provided by the permittee sufficiently clarified the source of the TTOs did not come from the cooling tower maintenance chemicals, but instead the source water. As such, the result was not determined to be a violation of the wastewater discharge permit.

Several updates were made to the Annual Water Quality Report from the previously submitted Quarterly Reports:

- a. The following monitoring data was sampled during the Third Quarter, but were entered or received after the Third Quarterly Report submittal:
  - Anita B. Smith Treatment Facility – 3/9/23 Self-Monitoring Report

Bruce Whitaker  
Chair  
Orange County  
Water District

Mike Gardner  
Vice Chair  
Western Municipal  
Water District

T. Milford Harrison  
Secretary-Treasurer  
San Bernardino Valley  
Municipal Water District

David J. Slawson  
Commissioner  
Eastern Municipal  
Water District

Jasmin A. Hall  
Commissioner  
Inland Empire  
Utilities Agency

Jeffrey J. Mosher  
General Manager

- Corona Regional Medical Center – 1/26/23 Self-Monitoring Report
- Qualified Mobile, Inc. – 1/25/23 Self-Monitoring Report
- SARI Metering Station – 3/15/23 OC San monitoring
- Saratoga Foods, Inc. – 3/22/23 Self-Monitoring Report
- Temescal Desalter – 1/24/23 Self-Monitoring Report

b. The following monitoring data was sampled during the Fourth Quarter, but were entered or received after the Fourth Quarterly Report submittal:

- Rialto Bioenergy Facility, LLC – 6/9/23, 6/10/23, 6/21/23 – 6/30/23 Self-Monitoring Report

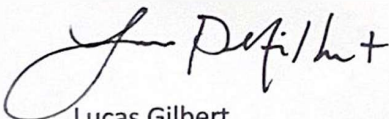
3. Flows.

Total flow measured by OC San at the Orange County SARI Metering Station (SMS) during the 12-month reporting period (July 1, 2022, through June 30, 2023) was 4,486 million gallons.

I certify, under penalty of law, that the information submitted in the attached documents (Attachments 1, 2, 3, 4, 5, 6, and 7), 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. Moreover, based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, the information submitted is, to the best of my knowledge, true, accurate, and complete.

Please contact the undersigned at (951) 354-4245 if any additional information is needed.

Sincerely,



Lucas Gilbert

Manager of Permitting and Pretreatment

Attachments:

1. Annual Report Chapter 7.4
2. Appendix F – Acknowledgements
3. Appendix H – List of SIUs with Monitoring Compliance Status
4. Appendix H – Permittees with Pretreatment Equipment
5. Appendix J – Monitoring and Compliance Status Report
6. Water Quality Data – Alphabetical by Permittee
7. SNC Publication Proof

E-Copy: Kiran Kaur, OC San



# THE PRESS-ENTERPRISE

Ad Copy:

1825 Chicago Ave, Suite 100  
Riverside, CA 92507  
951-684-1200  
951-368-9018 FAX

## PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: 3727436 / 3727436

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

**08/21/2023**

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: August 21, 2023  
At: Riverside, California



Legal Advertising Representative, The Press-Enterprise

CALIF NEWSPAPER SERV BUREAU / CALIF NEWSPAPER SERVICE  
BUREAU, CLIENT  
PO BOX 60460  
LOS ANGELES, CA 90060

Ad Number: 0011617440-01

P.O. Number: 3727436

### **PUBLIC NOTICE**

In accordance with the public participation requirements of 40 Code of Federal Regulations (CFR) Part 25 in the enforcement of National Pretreatment Standards and as defined by 40 CFR 403.8(f)(2)(vii), the Santa Ana Watershed Project Authority (SAWPA) is hereby publishing the following list of permittees who, during July 1, 2022 through June 30, 2023, were identified as industries in significant noncompliance with wastewater discharge standards. An industry is in significant noncompliance if their violation meets one or more of the following criteria:

Chronic violations of discharge limits occurring when 66% or more of all measurements exceed the discharge limits for the same pollutant during a six month period.  
Technical Review Criteria violations of discharge limits occurring when 33% or more of all measurements equal or exceed the product of the numeric Pretreatment Standard or Requirement multiplied by the applicable TRC during a six month period.

Any other violation of a Pretreatment Standard or Requirement that the POTW determines has caused Interference or Pass Through.

Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment.

Failure to meet within 90 days after the schedule date, a compliance schedule milestone.

Failure to provide required reports including, but not limited to, periodic self-monitoring reports and reports with compliance schedules within 45 days of the due date.

Failure to accurately report noncompliance with discharge limits or any other requirements applicable to the user pursuant to SAWPA's Wastewater Discharge Regulations (Ordinance).

Any other violation or group of violations, which the wastewater treatment plant determines will adversely affect the operation or implementation of the Pretreatment Program.

#### **Summary of Permittees in Significant Noncompliance Fiscal Year 2022-2023**

#### **Permittee with Reporting Violation**

**Company Name**

C.C. Graber Company

**Permit No.**

I1005-4

**City**

Ontario

8/21/23

**PE-3727436#**

**THE PRESS ENTERPRISE**

**APPENDIX H**  
**SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2022 – JUNE 30, 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	WMWD	Direct	D1074-5	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	4	8	4			
Aramark Uniform & Career Apparel, LLC	WMWD	Direct	D1004-2	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	4	13	29			
California Institution for Men	IEUA	Direct	D1006-5	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	5	14	30			
Chino I Desalter	SAWPA	Direct	D1081-5.1	6905 Kimball Avenue Chino, CA 91709	221310	SIU	403.5(d)	-	4	8	4			
Chino II Desalter	SAWPA	Direct	D1010-5.1	11251 Harrel Street, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	16	9			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-2	715 East 4th Street, Beaumont, CA 92223	221320	SIU	403.5(d)	-	4	6	6			
City of Colton - Agua Mansa Power Plant	VALLEY	Direct	D1002-5	2040 W. Agua Mansa Road, Colton, CA 92324	221122	SIU	403.5(d)	-	4	20	20			
Dart Container Corporation	WMWD	Direct	D1019-5	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	4	9	24			
Del Real, LLC	JCSD	Direct	D1021-4	11041 Inland Avenue, Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	4	31	29			
Eastside Water Treatment Plant	IEUA	Indirect	I1024-4	7537 Schaefer Avenue, Ontario, CA 91761	221310	SIU	403.5(d)	-	5	18	52			SIU Permit issued 7/12/22
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-5	29541 Murrieta Road, Menifee, CA 92586	221310	SIU	403.5(d)	-	4	15	8			
Infineon Technologies Americas Corporation	EMWD	Indirect	I1039-4	41915 Business Park Drive, Temecula, CA 92590	334413	CIU	469.18	Y	3	8	6			Permit Closed 4/10/23
Inland Water Services	SBMWD	Indirect	I1066-4.1	939 W. Reece Street, San Bernardino, CA 92411	238220 454390 561990	SIU	403.5(d)	-	4	24	8	Copper (Local)		
In-N-Out Burger, Chino Distribution Center	IEUA	Direct	D1134-1	16000 Quality Way, Chino, CA 91708	493120 722513	SIU	403.5(d)	-	4	15	24			
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-5	Etiwanda Ave. and north of Bellegrave Ave., Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	32	28			

**APPENDIX H**  
**SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2022 – JUNE 30, 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
JCSD Hamner Metering Station	SAWPA	Direct	D1045-5	5410 Hamner Avenue, Eastvale, CA 91752	221320	SIU	403.5(d)	-	4	16	16			
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)	-	5	2	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)	-	4	0	0			No discharge during reporting period
JCSD Wineville Metering Station	SAWPA	Direct	D1048-5	5101 Wineville Avenue, Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	16	28			
Metal Container Corporation	JCSD	Direct	D1056-4	10980 Inland Avenue, Jurupa Valley, CA 91752	322431	CIU	465.45(d)	-	4	33	16			
Mission Linen Supply	IEUA	Direct	D1057-5	5400 Alton Street, Chino, CA 91710	812332	SIU	403.5(d)	-	4	40	47	1,4-dioxane (Local)		
Mountainview Generating Station	VALLEY	Direct	D1058-4	2492 W. San Bernardino Ave., Redlands, CA 92374	221112	CIU	423.17	Y	5	21	23			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-3	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	4	13	29	pH (Local)		
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-3	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	5	24	29	pH (Local)		
OLS Energy	IEUA	Direct	D1059-4	5601 Eucalyptus Avenue, Chino, CA 91710	221112	CIU	423.17	-	4	37	44			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-5	3400 Pyrite Street, Jurupa Valley, CA 92509	562910 562211	SIU	403.5(d)	-	4	37	252			
Repet, Inc.	IEUA	Direct	D1069-5	14207 Monte Vista Avenue, Chino, CA 91710	423930	SIU	403.5(d)	-	5	38	38			
Rialto Bioenergy Facility, LLC	VALLEY	Direct	D1130-2	503 E. Santa Ana Avenue, Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	8	24	562	BOD, TSS, pH (Local)		
Skorpios Technologies, Inc.	EMWD	Indirect	I1136-1	41915 Business Park Drive, Temecula, CA 92590	334413	CIU	469.18	Y	1	2	2			Permit Issued 4/10/23

**APPENDIX H**  
**SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2022 – JUNE 30, 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
Temescal Desalter	WMWD	Direct	D1012-5	745 Public Safety Way, Corona, CA 92880	221310	SIU	403.5(d)	-	4	8	5			
Wellington Foods, Inc.	WMWD	Direct	D1086-5	1930 California Avenue, Corona, CA 92881	311999	SIU	403.5(d)	-	5	10	24			
WMWD Arlington Desalter	SAWPA	Direct	D1088-5	11611 Sterling Avenue, Riverside, CA 92503	221310	SIU	403.5(d)	-	4	8	4			
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-5	880 W. County Line, Road, Calimesa, CA 92320	221310 221320	SIU	403.5(d)	-	4	8	8			

**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	D1074-5	Anita B. Smith Treatment Facility	SIU 40 CFR 403.5(d)	0.030									X																	
WMWD	D1004-2	Aramark Uniform & Career Apparel, LLC	SIU 40 CFR 403.5(d)	0.330							X			X			X				X			X		X	X		X	
IEUA	I1005-4	C.C. Graber Company	IU 40 CFR 403.5(d)	N/A																	X									Sand Filters, Cartridge Filters
IEUA	D1006-5	California Institution for Men	SIU 40 CFR 403.5(d)	0.194										X																
IEUA	D1007-4	California Institution for Women	IU 40 CFR 403.5(d)	0.400											X															Grease Interceptors and Sewage Grinder
SAWPA	D1081-5.1	Chino I Desalter	SIU 40 CFR 403.5(d)	2.050										X																
SAWPA	D1010-5.1	Chino II Desalter	SIU 40 CFR 403.5(d)	2.020										X																
SAWPA	D1129-2	City of Beaumont Wastewater Treatment Plant	SIU 40 CFR 403.5(d)	0.550										X																
Valley	D1002-5	City of Colton - Agua Mansa Power Plant	SIU 40 CFR 403.5(d)	0.062														X												Ultra-Filtration

**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	I1016-4	Corona Regional Medical Center	IU 40 CFR 403.5(d)	0.060									X																	Permit Closed 6/1/2023
WMWD	D1019-5	Dart Container Corporation	SIU 40 CFR 403.5(d)	0.030								X		X								X	X							
WMWD	I1020-4	Decra Roofing Systems	IU 40 CFR 403.5(d)	N/A								X		X									X	X		X				
JCSD	D1021-4	Del Real, LLC	SIU 40 CFR 403.5(d)	0.190			X					X		X	X							X		X						DAF & Automated Chemical Feed
IEUA	I1024-4	Eastside Water Treatment Facility	SIU 40 CFR 403.5(d)	N/A									X																	SIU Permit issued 7/12/22
SBMWD	I1003-5	Emerald Colton	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1061-5	EMWD Perris & Menifee Desalination Facility	SIU 40 CFR 403.5(d)	4.048										X																Filtration, Green Sand for Iron & Manganese
WMWD	D1029-3.1	Frutarom USA, Inc.	IU 40 CFR 403.5(d)	0.050								X		X				X				X	X							
IEUA	D1032-3	Green River Golf Club	IU 40 CFR 403.5(d)	0.020											X															Grease Interceptor

**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
EMWD	I1133-1	Indian Oaks Campground, LLC	IU 40 CFR 403.5(d)	N/A									X																	
EMWD	I1039-5	Infineon Technologies Americas Corporation	CIU 40 CFR 469.18	N/A										X							X					X				Permit Closed 4/10/23
SBMWD	I1066-4.1	Inland Water Services	SIU 40 CFR 403.5(d)	N/A			X																							EC Meter and Diversion Valve
IEUA	D1134-1	In-N-Out Burger, Chino Distribution Center	SIU 40 CFR 403.5(d)	0.086								X																		Rotary Screen
SAWPA	D1044-5	JCSD Etiwanda Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	D1045-5	JCSD Hamner Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	D1070-6	JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SIU 40 CFR 403.5(d)	0.250								X																		
SAWPA	D1040-5	JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SIU 40 CFR 403.5(d)	0.300									X																	



**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
SAWPA	D1048-5	JCSD Wineville Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
WMWD	I1050-4	La Sierra University	IU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1051-3	Loma Linda University Power Plant	IU 40 CFR 403.5(d)	N/A									X																	TDS Meter and Diversion Valve
SBMWD	I1052-4	Loma Linda Veterans Medical Center	IU 40 CFR 403.5(d)	N/A									X																	
JCSD	D1053-3	Magnolia Foods, LLC	IU 40 CFR 403.5(d)	0.004											X						X									Grease Interceptor
JCSD	D1056-4	Metal Container Corporation	CIU 40 CFR 465.45(d)	0.165								X		X				X					X	X						Oil Skimming
IEUA	D1057-5	Mission Linen Supply	SIU 40 CFR 403.5(d)	0.713								X		X										X		X				Shaker Screens
Valley	D1058-4	Mountainview Generating Station	CIU 40 CFR 423.17	0.432			X							X				X					X							Filtration
IEUA	I1114-3	Niagra Bottling, LLC (IEUA)	SIU 40 CFR 403.5(d)	N/A									X																	

**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
SBMWD	I1111-3	Niagra Bottling, LLC (SBMWD)	SIU 40 CFR 403.5(d)	N/A									X																	
IEUA	D1059-4	OLS Energy	CIU 40 CFR 423.17	0.130										X			X													
WMWD	I1062-4	Prudential Overall Supply	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1079-5	Pyrite Canyon Treatment Facility	SIU 40 CFR 403.5(d)	0.259								X		X				X								X				Air Strippers, Pesticide Co-Precipitation, Inline Cloth Filters, Granulated Activate Carbon Absorption
WMWD	I1064-5	Qualified Mobile, Inc.	IU 40 CFR 403.5(d)	N/A										X							X	X								
IEUA	D1069-5	Repet, Inc.	SIU 40 CFR 403.5(d)	0.043								X		X							X		X			X	X			GEM., Drum & Shaker Screens
Valley	D1130-2	Rialto Bioenergy Facility, LLC	SIU 40 CFR 403.5(d)	0.250								X		X						X	X		X	X		X	X	X		Biological Treatment
IEUA	I1096-3	San Antonio Regional Hospital	IU 40 CFR 403.5(d)	N/A									X																	

**APPENDIX H  
SAWPA PRETREATMENT PROGRAM FY 2022-2023  
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	I1128-2	Saratoga Foods Specialties - Eastvale	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1124-2	SCE Mira Loma Peaker Plant	IU 40 CFR 403.5(d)	N/A														X												
WMWD	I1078-5	Sierra Aluminum Company, Inc.	IU 40 CFR 403.5(d)	N/A									X																	
EMWD	I1136-1	Skorpios Technologies, Inc.	CIU 40 CFR 469.18	N/A																										Permit Issued 4/10/23
WMWD	D1012-5	Temescal Desalter	SIU 40 CFR 403.5(d)	2.150									X																	
WMWD	D1086-5	Wellington Foods, Inc.	SIU 40 CFR 403.5(d)	0.030								X		X							X	X								
SAWPA	D1088-5	WMWD Arlington Desalter	SIU 40 CFR 403.5(d)	1.400									X																	
SAWPA	D1090-5	YVWD – Henry Wochholz Regional Water Recycling Facility	SIU 40 CFR 403.5(d)	0.595									X																	



Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Anita B. Smith Treatment Facility	1	1	0	2	0	2	0	CAC		
2100 Fleetwood Drive	2	1	0	2	0	0	0	CAC		
Jurupa Valley, CA 92509	3	1	0	2	0	2	0	CAC		
Permit No. D1074-5	4	1	0	2	0	0	0	CAC		
Aramark Uniform & Career Apparel, LLC	1	1	1	2	4	4	0	CAC		
1135 Hall Avenue	2	1	1	2	3	4	0	CAC		
Riverside, CA 92509	3	1	1	2	3	4	0	CAC		
Permit No. D1004-2	4	1	1	3	3	4	0	CAC		
C.C. Graber Company	1	1	0	0	0	0	0	CAC		
315 E. 4th Street	2	0	0	8	0	10	0	IAC	1	
Ontario, CA 91764	3	1	0	0	0	0	0	CAC		NOV/SNC: late SMR
Permit No. I1005-4	4	0	0	0	0	0	0	CAC		
California Institution for Men	1	1	2	2	3	5	0	CAC		
5997 Edison Avenue	2	2	1	2	3	4	0	IAC	1	NOV: flow system
Chino, CA 91710	3	1	1	2	3	3	0	CAC		
Permit No. D1006-5	4	1	1	3	3	6	0	CAC		
California Institution for Women	1	1	3	7	3	7	0	CAC		
16756 Chino Corona Road	2	1	3	6	3	7	0	CAC		
Corona, CA 92880	3	1	3	7	3	6	0	CAC		
Permit No. D1007-4	4	1	3	6	3	8	0	CAC		
Chino I Desalter	1	1	1	1	1	1	0	CAC		
6905 Kimball Avenue	2	1	1	1	0	0	0	CAC		
Chino, CA 91709	3	1	1	1	1	1	0	CAC		
Permit No. D1081-5.1	4	1	1	1	0	0	0	CAC		
Chino II Desalter	1	1	2	2	2	2	0	CAC		
11251 Harrel Street	2	1	2	2	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	2	2	3	2	0	CAC		
Permit No. D1010-5.1	4	1	2	2	0	0	0	CAC		
City of Beaumont Wastewater Treatment Plant	1	1	0	0	0	0	0	CAC		
715 East 4th Street	2	1	1	1	1	1	0	CAC		
Beaumont, CA 92223	3	1	1	1	1	1	0	CAC		
Permit No. D1129-2	4	1	1	1	1	1	0	CAC		
City of Colton - Agua Mansa Power Plant	1	1	1	4	1	4	0	CAC		
2040 W. Agua Mansa Road	2	1	1	4	1	4	0	CAC		
Colton, CA 92324	3	1	1	4	1	4	0	CAC		
Permit No. D1002-5	4	1	1	4	1	4	0	CAC		

**COMPLIANCE STATUS**

ID - Insufficient Data

CAC - Consistently Achieving Compliance

IAC - Inconsistently Achieving Compliance

SNC - Significant Non Compliance

NOV/OCA - Notice of Violation and Order for Corrective Action

WW - Written Warning



Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Corona Regional Medical Center	1	0	0	0	0	0	0	CAC		
800 S. Main Street	2	0	0	0	0	0	0	CAC		
Corona, CA 92882	3	0	0	0	0	2	0	CAC		
Permit No. I1016-4	4	0	0	0	0	0	0	CAC		Permit Closed 6/1/23
Dart Container Corporation	1	1	1	1	3	3	0	CAC		
150 S. Maple Street	2	1	1	1	2	2	0	CAC		
Corona, CA 92880	3	1	2	1	4	4	0	CAC		
Permit No. D1019-5	4	1	1	1	3	3	0	CAC		
Decra Roofing Systems	1	1	0	0	0	7	0	CAC		
1230 Railroad Street	2	1	0	3	0	8	0	CAC		
Corona, CA 92882	3	0	0	0	0	3	0	CAC		
Permit No. I1020-4	4	1	0	3	0	2	0	CAC		
Del Real, LLC	1	1	4	3	4	3	0	CAC		
11041 Inland Avenue	2	1	4	3	3	4	0	CAC		
Jurupa Valley, CA 91752	3	1	4	4	5	3	0	CAC		
Permit No. D1021-4	4	1	4	5	4	3	0	CAC		
Eastside Water Treatment Plant	1	1	0	6	0	14	0	CAC		SIU Permit issued 7/12/22
7537 Schaefer Avenue	2	1	0	3	0	14	0	CAC		
Ontario, CA 91761	3	1	0	6	0	14	0	CAC		
Permit No. I1024-4	4	2	0	3	0	10	0	CAC		
Emerald Colton	1	0	0	0	0	0	0	CAC		
925 South 8th Street	2	0	0	0	0	0	0	CAC		
Colton, CA 92324	3	1	0	6	0	3	0	CAC		
Permit No. I1003-5	4	0	0	0	0	0	0	CAC		
EMWD Perris & Menifee Desalination Facility	1	1	2	1	2	2	0	CAC		
29541 Murrieta Road	2	1	2	2	0	0	0	CAC		
Menifee, CA 92586	3	1	2	2	2	2	0	CAC		
Permit No. D1061-5	4	1	2	2	0	0	0	CAC		
Frutarom USA, Inc.	1	0	1	2	3	3	0	IAC	1	NOV: late SMR
790 E. Harrison Street	2	1	1	1	3	4	0	CAC		
Corona, CA 92879	3	2	0	3	1	5	0	CAC		
Permit No. D1029-3.1	4	1	0	2	0	7	0	CAC		
Green River Golf Club	1	1	0	0	4	4	0	CAC		
5215 Green River Road	2	0	1	1	3	3	0	CAC		
Corona, CA 92880	3	0	1	2	3	3	0	CAC		
Permit No. D1032-3	4	1	0	0	4	4	0	IAC	1	NOV: pH violation

**COMPLIANCE STATUS**

ID - Insufficient Data

CAC - Consistently Achieving Compliance

IAC - Inconsistently Achieving Compliance

SNC - Significant Non Compliance

NOV/OCA - Notice of Violation and Order for Corrective Action

WW - Written Warning



Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Indian Oaks Campground, LLC	1	0	0	0	0	0	0	CAC		
38120 E. Benton Road	2	0	0	0	0	0	0	CAC		
Temecula, CA 92593	3	1	0	0	0	0	0	CAC		
Permit No. I1133-1	4	0	0	2	0	0	0	CAC		
Infineon Technologies Americas Corp.	1	1	1	3	1	1	0	CAC		
41915 Business Park Drive	2	1	1	1	1	1	0	CAC		
Temecula, CA 92590	3	1	1	1	1	1	0	CAC		
Permit No. I1039-5	4	0	0	0	0	0	0	CAC		Permit Closed 4/10/23
Inland Water Services	1	1	0	6	0	3	0	CAC		
939 West Reece Street	2	1	0	6	0	1	0	CAC		
San Bernardino, CA 92411	3	1	0	6	0	3	0	CAC		
Permit No. I1066-4.1	4	1	0	6	0	1	0	IAC	1	NOV: copper violation
In-N-Out Burger, Chino Distribution Center	1	1	0	0	0	0	0	CAC		
16000 Quality Way	2	1	1	4	1	3	0	CAC		
Chino, CA 91708	3	1	1	4	3	7	0	CAC		
Permit No. D1134-1	4	1	1	4	3	7	0	CAC		
JCSD Etiwanda Metering Station	1	1	3	5	3	3	0	CAC		
Etiwanda Ave. and north of Bellegrave Ave.	2	1	3	5	3	3	0	CAC		
Jurupa Valley, CA 91752	3	1	3	5	3	5	0	CAC		
Permit No. D1044-5	4	1	3	5	3	5	0	CAC		
JCSD Hamner Metering Station	1	1	1	3	1	3	0	CAC		
5410 Hamner Avenue	2	1	1	3	1	3	0	CAC		
Eastvale, CA 91752	3	1	1	3	1	3	0	CAC		
Permit No. D1045-5	4	1	1	3	1	3	0	CAC		
JCSD Roger D. Teagarden Ion Exchange WTP	1	1	1	1	1	3	0	CAC		
4150 Etiwanda Avenue	2	1	0	0	0	0	0	CAC		
Jurupa Valley, CA 91752	3	2	0	0	0	0	0	CAC		
Permit No. D1070-6	4	1	0	0	0	0	0	CAC		
JCSD Wells 17 & 18 Ion Exchange TF	1	1	0	0	0	0	0	CAC		
3474 De Forest Circle	2	1	0	0	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	0	0	0	0	0	CAC		
Permit No. D1040-5	4	1	0	0	0	0	0	CAC		
JCSD Wineville Metering Station	1	1	1	3	3	3	0	CAC		
5101 Wineville Avenue	2	1	1	3	3	3	0	CAC		
Jurupa Valley, CA 91752	3	1	1	3	3	5	0	CAC		
Permit No. D1048-5	4	1	1	3	3	5	0	CAC		

**COMPLIANCE STATUS**

ID - Insufficient Data

CAC - Consistently Achieving Compliance

IAC - Inconsistently Achieving Compliance

SNC - Significant Non Compliance

NOV/OCA - Notice of Violation and Order for Corrective Action

WW - Written Warning



Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
La Sierra University	1	0	0	0	0	0	0	CAC		
4500 Riverwalk Pkwy.	2	0	0	0	0	0	0	CAC		
Riverside, CA 92505	3	0	0	0	0	0	0	CAC		
Permit No. I1050-4	4	1	0	2	0	2	0	CAC		
Loma Linda University Power Plant	1	0	0	0	0	0	0	CAC		
11100 Anderson Street	2	0	0	0	0	0	0	CAC		
Loma Linda, CA 92350	3	1	0	6	0	3	0	CAC		
Permit No. I1051-3	4	0	0	0	0	0	0	CAC		
Loma Linda Veterans Medical Center	1	0	0	0	0	0	0	CAC		
11201 Benton Street	2	0	0	0	0	0	0	CAC		
Loma Linda, CA 92357	3	1	0	6	0	4	0	CAC		
Permit No. I1052-4	4	0	0	0	0	0	0	CAC		
Magnolia Foods	1	1	4	3	1	3	0	CAC		
11058 Philadelphia Avenue	2	1	3	0	0	0	0	CAC		
Mira Loma, CA 91752	3	1	5	6	1	3	0	CAC		
Permit No. D1053-3	4	1	4	4	0	0	0	CAC		
Metal Container Corporation	1	1	4	1	1	5	0	CAC		
10980 Inland Avenue	2	1	4	5	1	1	0	CAC		
Jurupa Valley, CA 91752	3	1	4	3	1	5	0	CAC		
Permit No. D1056-4	4	1	4	8	1	1	0	CAC		
Mission Linen Supply	1	1	3	7	3	8	0	CAC		
5400 Alton Street	2	1	3	7	4	10	0	IAC	2	NOV: 1,4-dioxane violation/failure to report violation
Chino, CA 91710	3	1	3	7	4	8	0	CAC		
Permit No. D1057-5	4	1	3	7	3	7	0	CAC		
Mountainview Generating Station	1	1	2	3	2	3	0	CAC		
2492 W. San Bernardino Avenue	2	1	2	3	2	4	0	CAC		
Redlands, CA 92374	3	1	2	3	2	4	0	CAC		
Permit No. D1058-4	4	2	2	4	2	4	0	CAC		
Niagara Bottling, LLC (IEUA)	1	1	0	4	0	7	0	CAC		
1401 N. Alder Avenue	2	1	0	3	0	8	0	IAC	1	NOV: pH violation
Rialto, CA 92376	3	1	0	3	0	7	0	CAC		
Permit No. I1114-3	4	1	0	3	0	7	0	CAC		
Niagara Bottling, LLC (SBMWD)	1	1	0	6	0	7	0	CAC		
1401 N. Alder Avenue	2	2	0	6	0	8	0	IAC	1	NOV: pH violation
Rialto, CA 92376	3	1	0	6	0	7	0	CAC		
Permit No. I1111-3	4	1	0	6	0	7	0	CAC		

COMPLIANCE STATUS	
ID - Insufficient Data	SNC - Significant Non Compliance
CAC - Consistently Achieving Compliance	NOV/OCA - Notice of Violation and Order for Corrective Action
IAC - Inconsistently Achieving Compliance	WW - Written Warning



Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
OLS Energy	1	1	2	5	4	4	0	CAC		
5601 Eucalyptus Avenue	2	1	2	8	4	10	0	CAC		
Chino, CA 91710	3	1	2	5	4	10	0	CAC		
Permit No. D1059-4	4	1	2	11	4	4	0	CAC		
Prudential Overall Supply	1	0	0	0	0	0	0	CAC		
6997 Jurupa Ave	2	0	0	0	0	0	0	CAC		
Riverside, CA 92504	3	0	0	0	0	0	0	CAC		
Permit No. I1062-4	4	1	0	2	0	2	0	CAC		
Pyrite Canyon Treatment Facility	1	1	2	6	18	46	0	CAC		
3400 Pyrite Street	2	1	2	7	17	45	0	CAC		
Jurupa Valley, CA 92509	3	1	2	7	18	42	0	CAC		
Permit No. D1079-5	4	1	2	9	18	48	0	CAC		
Qualified Mobile, Inc.	1	1	0	2	0	0	0	CAC		
1648 Industrial Ave., Suite A	2	1	0	0	0	0	0	CAC		
Norco, CA 92860	3	0	0	0	0	2	0	CAC		
Permit No. I1064-5	4	0	0	0	0	0	0	CAC		
Repet, Inc.	1	1	3	6	3	6	0	CAC		
14207 Monte Vista Avenue	2	1	3	7	3	7	0	CAC		
Chino, CA 91710	3	2	3	6	3	6	0	CAC		
Permit No. D1069-5	4	1	3	7	3	7	0	CAC		
Rialto Bioenergy Facility, LLC	1	1	1	5	84	85	0	IAC	4	NOV: BOD, pH violations
503 E. Santa Ana Avenue	2	2	1	5	85	73	0	IAC	1	
Bloomington, CA 92316	3	3	1	5	82	69	0	IAC	4	NOV: BOD, TSS, pH violations
Permit No. D1130-2	4	2	1	5	51	33	0	IAC	2	
San Antonio Regional Hospital	1	1	0	3	0	6	0	CAC		
999 San Bernardino Road	2	0	0	0	0	7	0	CAC		
Upland, CA 91786	3	0	0	0	0	6	0	CAC		
Permit No. I1096-3	4	1	0	3	0	7	0	CAC		
Saratoga Foods, Inc.	1	1	0	3	0	3	0	CAC		
6285 Providence Way	2	1	0	0	0	0	0	CAC		
Eastvale, CA 92880	3	0	0	0	0	3	0	CAC		
Permit No. I1128-2	4	1	0	6	0	0	0	CAC		
SCE Mira Loma Peaker Plant	1	0	0	0	0	5	0	CAC		
13568 S. Milliken Avenue	2	1	0	5	0	0	0	CAC		
Ontario, CA 91762	3	1	0	0	0	0	0	CAC		Permit Closed 3/16/23
Permit No. D1124-2	4	1	0	0	0	5	0	CAC		Permit Issued 5/18/23

COMPLIANCE STATUS	
ID - Insufficient Data	SNC - Significant Non Compliance
CAC - Consistently Achieving Compliance	NOV/OCA - Notice of Violation and Order for Corrective Action
IAC - Inconsistently Achieving Compliance	WW - Written Warning





Appendix J  
Monitoring and Compliance Status Report  
July 1, 2022 - June 30, 2023



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Sierra Aluminum Company	1	0	0	0	0	0	0	CAC		
2345 Fleetwood Dr.	2	0	0	0	0	0	0	CAC		
Riverside, CA 92509	3	0	0	0	0	0	0	CAC		
Permit No. I1078-5	4	1	0	6	0	2	0	CAC		
Skorpios Technologies, Inc.	1	0	0	0	0	0	0	CAC		
41915 Business Park Drive	2	0	0	0	0	0	0	CAC		
Temecula, CA 92590	3	0	0	0	0	0	0	CAC		
Permit No. I1136-1	4	1	1	1	1	1	0	CAC		Permit Issued 4/10/23
Temescal Desalter	1	1	1	1	1	1	0	CAC		
745 Public Safety Way	2	1	1	1	0	0	0	CAC		
Corona, CA 92880	3	1	1	1	1	1	0	CAC		
Permit No. D1012-5	4	1	1	1	1	0	0	CAC		
Wellington Foods, Inc.	1	1	1	1	3	3	0	CAC		
1930 California Avenue	2	1	1	1	3	3	0	CAC		
Corona, CA 92881	3	2	1	1	3	3	0	CAC		
Permit No. D1086-5	4	1	2	2	3	3	0	CAC		
WMWD Arlington Desalter	1	1	1	1	1	1	0	CAC		
11611 Sterling Avenue	2	1	1	1	0	0	0	CAC		
Riverside, CA 92503	3	1	1	1	1	1	0	CAC		
Permit No. D1088-5	4	1	1	1	0	0	0	CAC		
YVWD Henry Wochholz RWRF	1	1	1	1	1	1	0	CAC		
880 W. County Line Road	2	1	1	1	1	1	0	CAC		
Calimesa, CA 92320	3	1	1	1	1	1	0	CAC		
Permit No. D1090-5	4	1	1	1	1	1	0	CAC		

**COMPLIANCE STATUS**

ID - Insufficient Data

CAC - Consistently Achieving Compliance

IAC - Inconsistently Achieving Compliance

SNC - Significant Non Compliance

NOV/OCA - Notice of Violation and Order for Corrective Action

WW - Written Warning

## Appendix I. QA/QC Analysis Results

---

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR JULY 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2404958	0.02	0.02	0.02	0.02	0.02	0.10		
	2404957	0.02	0.02	0.02	0.02	0.02	0.10		
	2404959	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2404956	0.02	0.02	0.02	0.02	0.02	0.10		
	2404954	0.02	0.02	0.02	0.02	0.02	0.10		
	2404955	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-021185	2404968		0.02	0.03	0.09	<b>0.10</b>	0.02	0.10	
		2370568	0.02	0.02	0.09	<b>0.10</b>	0.02	0.10	
									<b>Relative % Difference</b>
1-021016	2404970		0.02	<b>1.15</b>	<b>0.38</b>	<b>0.48</b>	0.02	0.40	
		2367861	0.02	<b>1.18</b>	<b>0.37</b>	<b>0.50</b>	0.02	0.40	
				2.58	2.67				<b>Relative % Difference</b>
1-521858	2404967		0.02	0.02	0.06	<b>0.10</b>	0.02	0.11	
		2366413	0.02	0.02	0.05	<b>0.10</b>	0.02	0.10	
									<b>Relative % Difference</b>
1-021520	2404969		0.02	0.02	0.05	<b>0.10</b>	0.02	0.11	
		2367656	0.02	0.02	<b>0.17</b>	<b>0.30</b>	0.02	0.10	
					109.09				<b>Relative % Difference</b>
			<b>0%</b>	<b>3%</b>	<b>56%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>29%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR AUGUST 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
		0.02	0.02	0.02	0.10	0.02	0.10		
Sampler A	2412720	0.02	0.02	0.02	0.02	0.02	0.10		
	2412719	0.02	0.02	0.02	0.02	0.02	0.10		
	2412716	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2412717	0.02	0.02	0.02	0.02	0.02	0.10		
	2412715	0.02	0.02	0.02	0.02	0.02	0.10		
	2412718	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	Avg. Deviation	
							<b>0.00</b>	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	Relative % Difference
1-531404	2423738		0.08	<b>0.39</b>	0.04	<b>0.93</b>	0.02	0.10	
		2387995	0.07	<b>0.40</b>	0.05	<b>0.99</b>	0.02	0.05	
				2.03		5.95			
1-021325	2386973		0.02	0.03	<b>0.31</b>	0.07	0.02	0.10	
		2386973	0.02	0.04	<b>0.31</b>	0.07	0.02	0.03	
					0.96				
1-011013	2423740		0.02	<b>0.36</b>	0.04	<b>0.43</b>	0.04	0.20	
		2386699	0.02	<b>0.34</b>	0.04	<b>0.46</b>	0.04	0.17	
				4.56					
1-021735	2423741		0.02	0.02	<b>0.27</b>	<b>0.21</b>	0.02	0.10	
		2386698	0.02	0.02	<b>0.26</b>	<b>0.24</b>	0.02	0.06	
					3.42				
			<b>0%</b>	<b>3%</b>	<b>2%</b>	<b>6%</b>	<b>0%</b>	<b>0%</b>	Analyte Avg. RPD
							<b>4%</b>	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR SEPTEMBER 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>										
<b>Equipment</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>			
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>		
Sampler A	2420089	0.02	0.02	0.02	0.02	0.02	0.10			
	2420091	0.02	0.02	0.02	0.02	0.02	0.10			
	2420090	0.02	0.02	0.02	0.02	0.02	0.10			
Sampler B	2420092	0.02	0.02	0.02	0.02	0.02	0.10			
	2420093	0.02	0.02	0.02	0.02	0.02	0.10			
	2420088	0.02	0.02	0.02	0.02	0.02	0.10			
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>		
								<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>										
<b>Permit #</b>	<b>Archive #</b>	<b>Original #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>		
1-600378	2430266		0.02	0.02	0.06	<b>0.31</b>	0.02	0.10		
		2388567	0.02	0.02	0.06	<b>0.30</b>	0.02	0.10		
									<b>Relative % Difference</b>	
1-551152	2430267		0.02	0.03	<b>0.39</b>	0.58	0.02	0.17		
		2388498	0.02	0.03	<b>0.37</b>	0.57	0.02	0.15		
					7.39	2.61			<b>Relative % Difference</b>	
1-600316	2430269		0.02	0.08	<b>0.16</b>	<b>0.32</b>	0.02	0.10		
		2388444	0.02	0.08	<b>0.15</b>	<b>0.30</b>	0.02	0.10		
					7.12				<b>Relative % Difference</b>	
1-011013	2430272		0.02	0.02	1.11	0.02	0.02	<b>1.93</b>		
		2388509	0.02	0.02	1.18	0.02	0.02	<b>2.03</b>		
					6.11			5.05	<b>Relative % Difference</b>	
			<b>0%</b>	<b>0%</b>	<b>7%</b>	<b>3%</b>	<b>0%</b>	<b>5%</b>	<b>Analyte Avg. RPD</b>	
									<b>5%</b>	<b>Table Average RPD</b>

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR OCTOBER 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2428737	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2428735	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2428736	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
Sampler B	2428734	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2428733	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2428732	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600316	2430925		0.02	0.02	0.07	<b>0.60</b>	0.02	0.10	
		2391170	0.02	0.02	0.08	<b>0.60</b>	0.02	0.05	
						0.34			<b>Relative % Difference</b>
1-021337	2430926		0.02	0.02	0.06	0.26	0.02	0.30	
		2389762	0.02	0.02	0.06	0.25	0.02	0.29	
									<b>Relative % Difference</b>
1-511407	2430927		0.02	0.19	0.11	0.32	0.02	0.17	
		2391750	0.02	0.18	0.10	0.30	0.02	0.16	
				4.96	6.83				<b>Relative % Difference</b>
1-601843	2430928		0.02	0.03	0.04	0.14	0.02	0.10	
		2391906	0.02	0.03	0.04	0.13	0.02	0.03	
							0.00		<b>Relative % Difference</b>
			<b>0%</b>	<b>5%</b>	<b>7%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>3%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR NOVEMBER 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
<b>Equipment</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2436122	0.02	0.02	0.02	0.02	0.02	0.10		
	2436120	0.02	0.02	0.02	0.02	0.02	0.10		
	2436121	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2436123	0.02	0.02	0.02	0.02	0.02	0.10		
	2436118	0.02	0.02	0.02	0.02	0.02	0.10		
	2436119	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
<b>Permit #</b>	<b>Archive #</b>	<b>Original #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	
1-511370	2437063		0.02	0.02	0.47	0.49	0.02	0.10	
		2399130	0.02	0.02	0.46	0.49	0.02	0.10	
					1.50				<b>Relative % Difference</b>
1-600708	2437065		0.02	0.03	<b>0.18</b>	0.57	0.08	0.13	
		2402144	0.02	0.03	<b>0.18</b>	0.57	0.09	0.15	
					0.57	0.70			<b>Relative % Difference</b>
1-551152	2437066		0.02	0.02	<b>0.19</b>	0.05	0.02	0.36	
		2400606	0.02	0.02	<b>0.19</b>	0.05	0.02	0.41	
					0.00				<b>Relative % Difference</b>
1-021520	2437067		0.02	<b>0.20</b>	0.09	<b>0.12</b>	0.02	0.10	
		2399571	0.02	<b>0.02</b>	0.09	<b>0.12</b>	0.02	0.10	
				2.03				5.05	<b>Relative % Difference</b>
			<b>0%</b>	<b>2%</b>	<b>1%</b>	<b>1%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>1%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR DECEMBER 2022**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
<b>Equipment</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2450646	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2450483	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2450482	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
Sampler B	2450481	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2448210	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2448208	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
<b>Permit #</b>	<b>Archive #</b>	<b>Original #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	
1-011354	2446926		0.02	0.02	0.03	<b>0.89</b>	0.02	0.10	
		2404514	0.02	0.02	0.03	<b>0.85</b>	0.02	0.10	
						4.13			<b>Relative % Difference</b>
1-011013	2446927		0.02	<b>0.37</b>	0.05	<b>0.18</b>	0.06	0.28	
		2407376	0.02	<b>0.41</b>	0.05	<b>0.18</b>	0.06	0.33	
				8.49					<b>Relative % Difference</b>
1-021289	2446928		0.02	0.02	<b>0.11</b>	<b>1.88</b>	0.02	0.18	
		2408114	0.02	0.02	<b>0.11</b>	<b>1.84</b>	0.02	0.17	
					4.57	2.15			<b>Relative % Difference</b>
1-600378	2446929		0.02	0.02	0.03	0.05	0.02	0.35	
		2408140	0.02	0.02	0.03	0.05	0.02	0.34	
									<b>Relative % Difference</b>
			<b>0%</b>	<b>8%</b>	<b>5%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
								<b>5%</b>	<b>Table Average RPD</b>

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.



**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR JANUARY 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2436124	0.02	0.02	0.02	0.02	0.02	0.10		
	2448207	0.02	0.02	0.02	0.02	0.02	0.10		
	2448209	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2448205	0.02	0.02	0.02	0.02	0.02	0.10		
	2448206	0.02	0.02	0.02	0.02	0.02	0.10		
	2457882	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011155	2452473		0.02	0.06	0.06	<b>0.31</b>	0.02	0.10	
		2419241	0.02	0.06	0.06	<b>0.30</b>	0.02	0.10	
									<b>Relative % Difference</b>
1-511370	2453392		0.02	0.02	<b>0.39</b>	<b>0.58</b>	0.02	0.17	
		2417816	0.02	0.02	<b>0.37</b>	<b>0.57</b>	0.02	0.15	
				7.39	2.61				<b>Relative % Difference</b>
1-021520	2453394		0.02	0.08	<b>0.16</b>	<b>0.32</b>	0.02	0.10	
		2417762	0.02	0.08	<b>0.15</b>	<b>0.30</b>	0.02	0.10	
					7.12				<b>Relative % Difference</b>
1-031036	2453395		0.02	0.02	<b>1.11</b>	0.02	0.02	1.93	
		2418322	0.02	0.02	<b>1.18</b>	0.02	0.02	2.03	
					6.11				<b>Relative % Difference</b>
			<b>0%</b>	<b>0%</b>	<b>7%</b>	<b>3%</b>	<b>0%</b>	<b>5%</b>	<b>Analyte Avg. RPD</b>
							<b>5%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR FEBRUARY 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2457801	0.02	0.02	0.02	0.02	0.02	0.10		
	2457800	0.02	0.02	0.02	0.02	0.02	0.10		
	2457799	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2457798	0.02	0.02	0.02	0.02	0.02	0.10		
	2457796	0.02	0.02	0.02	0.02	0.02	0.10		
	2457797	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-601843	2456674		0.02	0.07	0.05	<b>0.23</b>	0.09	0.14	
		2422322	0.02	0.06	0.05	<b>0.23</b>	0.08	0.10	
									<b>Relative % Difference</b>
1-511407	2456675		0.02	<b>0.27</b>	<b>0.12</b>	<b>0.16</b>	0.02	0.20	
		2422319	0.02	<b>0.26</b>	<b>0.11</b>	<b>0.16</b>	0.02	0.21	
				3.40	2.60				<b>Relative % Difference</b>
1-031110	2456676		0.02	0.02	0.02	<b>0.19</b>	0.02	0.11	
		2423331	0.02	0.02	0.02	<b>0.19</b>	0.02	0.11	
									<b>Relative % Difference</b>
1-600378	2456677		0.02	0.02	0.04	0.02	0.02	0.30	
		2417102	0.02	0.02	0.04	0.02	0.02	0.32	
									<b>Relative % Difference</b>
			<b>0%</b>	<b>3%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>3%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR MARCH 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2464161	0.02	0.02	0.02	0.02	0.02	0.10		
	2464160	0.02	0.02	0.02	0.02	0.02	0.10		
	2464159	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2464158	0.02	0.02	0.02	0.02	0.02	0.10		
	2464157	0.02	0.02	0.02	0.02	0.02	0.10		
	2464156	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-531422	2340758		0.02	0.05	0.44	0.02	0.02	0.10	
		2448784	0.02	0.04	0.40	0.07	0.02	0.10	
					8.08				<b>Relative % Difference</b>
1-531404	2490759		0.06	<b>0.25</b>	0.02	1.67	0.02	0.10	
		2454811	0.05	<b>0.21</b>	0.02	1.54	0.02	0.10	
				14.91		8.10			<b>Relative %Difference</b>
1-011100	2490761		0.02	0.05	0.71	0.02	0.02	0.26	
		2449899	0.02	0.05	0.69	0.03	0.02	0.25	
					2.28				<b>Relative % Difference</b>
1-600503	2490762		0.02	0.02	0.72	0.02	0.02	0.15	
		2453294	0.02	0.02	0.66	0.09	0.02	0.12	
				8.81					<b>Relative % Difference</b>
			<b>0%</b>	<b>15%</b>	<b>6%</b>	<b>8%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>10%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR APRIL 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
		0.02	0.02	0.02	0.10	0.02	0.10		
Sampler A	2471439	0.02	0.02	0.02	0.02	0.02	0.10		
	2471437	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
	2471438	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>		
Sampler B	2471436	0.02	0.02	0.02	0.02	0.02	0.10		
	2471435	0.02	0.02	0.02	0.02	0.02	0.10		
	2471440	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	Avg. Deviation	
							<b>0.00</b>	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	Relative % Difference
1-011064	2499505		0.02	0.02	0.02	0.67	0.02	0.10	
		2456510	0.02	0.02	0.02	0.66	0.02	0.10	
						1.95			
1-021336	2499506		0.02	0.04	0.04	0.02	0.02	0.10	
		2453941	0.02	0.04	0.05	0.02	0.02	0.10	
1-021337	2499507		0.02	0.02	0.09	<b>0.16</b>	0.05	0.30	
		2452109	0.02	0.02	0.09	<b>0.16</b>	0.05	0.30	
1-021424	2499508		0.05	0.02	0.03	<b>0.10</b>	0.05	0.10	
		2447074	0.45	0.02	0.04	0.10	0.03	0.10	
			2.45						
			<b>2%</b>	<b>0%</b>	<b>0%</b>	<b>2%</b>	<b>0%</b>	<b>0%</b>	Analyte Avg. RPD
							<b>2%</b>	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR MAY 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
		0.02	0.02	0.02	0.10	0.02	0.10		
Sampler A	2477781	0.02	0.02	0.02	0.02	0.02	0.10		
	2477780	0.02	0.02	0.02	0.02	0.02	0.10		
	2477779	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2477778	0.02	0.02	0.02	0.02	0.02	0.10		
	2477777	0.02	0.02	0.02	0.02	0.02	0.10		
	2477776	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	Avg. Deviation	
							<b>0.00</b>	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	Relative % Difference
1-031341	2499514		0.02	0.02	<b>0.33</b>	0.02	0.02	0.10	
		2454203	0.02	0.02	<b>0.32</b>	0.06	0.02	0.10	
					2.15				
1-531415	2499515		0.02	0.02	0.08	0.02	0.02	0.22	
		2449678	0.02	0.02	0.08	0.02	0.02	0.20	
									Relative % Difference
1-521859	2499516		0.05	0.02	<b>5.39</b>	0.02	0.02	0.10	
		2445320	0.04	0.02	<b>5.39</b>	0.08	0.02	0.10	
					0.00				Relative % Difference
1-521859	2499517		0.02	0.02	<b>2.99</b>	0.45	0.02	0.10	
		2456206	0.02	0.02	<b>2.77</b>	0.44	0.02	0.10	
					7.64				Relative % Difference
			<b>0%</b>	<b>0%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	Analyte Avg. RPD
							<b>3%</b>	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**QA/QC ANALYSIS RESULTS FOR JUNE 2023**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>Equipment Blank Evaluation</b>									
<b>Equipment</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>		
		0.02	0.02	0.02	0.10	0.02	0.10	<b>Reporting Limit (mg/L)</b>	
Sampler A	2485018	0.02	0.02	0.02	0.02	0.02	0.10		
	2485017	0.02	0.02	0.02	0.02	0.02	0.10		
	2485015	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2485016	0.02	0.02	0.02	0.02	0.02	0.10		
	2485019	0.02	0.02	0.02	0.02	0.02	0.10		
	2485014	0.02	0.02	0.02	0.02	0.02	0.10		
		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Avg. Deviation</b>	
							<b>0.00</b>	<b>Table Average Deviation</b>	
<b>Archive Sample Evaluation</b>									
<b>Permit #</b>	<b>Archive #</b>	<b>Original #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	
1-521761	2499522		0.02	0.02	<b>0.28</b>	0.02	<b>0.05</b>	<b>0.10</b>	
		2463131	0.02	0.02	<b>0.28</b>	0.02	<b>0.05</b>	<b>0.10</b>	
					1.08				<b>Relative % Difference</b>
1-600708	2499523		0.02	0.03	0.37	0.41	0.02	0.22	
		2472009	0.02	<b>0.03</b>	<b>0.34</b>	0.41	0.02	0.23	
					9.90				<b>Relative % Difference</b>
1-521858	2466413		0.02	0.02	0.06	0.03	0.02	0.02	
		2499967	0.02	0.02	<b>0.06</b>	0.02	0.02	<b>0.11</b>	
									<b>Relative % Difference</b>
1-021185	2499968		0.02	<b>0.03</b>	<b>0.09</b>	0.02	0.02	0.02	
		2470568	0.02	<b>0.02</b>	<b>0.09</b>	<b>0.06</b>	0.02	0.02	
									<b>Relative % Difference</b>
			<b>0%</b>	<b>0%</b>	<b>5%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>Analyte Avg. RPD</b>
							<b>5%</b>	<b>Table Average RPD</b>	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

**APPENDIX I**  
**SAMPLE COLLECTION CHECK RESULTS, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>SAMPLE COLLECTION CHECK RESULTS, JUL-SEP 2022</b>									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2436363	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.0	2436354
	2436364	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	0.9	2436355
	2436365	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	0.8	2436356
	2436366	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.1	2436357
	2436367	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.1	2436358
<b>Average Range</b>		0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.0	<b>Average Range</b>
		0.00	0.00	0.00	0.00	0.00	0.00	0.3	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	--	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2436368	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.0	2436359
	2436369	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.2	2436360
	2436370	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.2	2436361
	2436371	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.1	2436362
	2436428	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.2	2436428
<b>Average Range</b>		0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	1.1	<b>Average Range</b>
		0.00	0.00	0.00	0.00	0.00	0.00	0.2	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	--	
<b>Site Relative Percent Difference</b>		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	--	
<b>Reporting Limits</b>		0.02	0.02	0.02	0.10	0.02	0.10	1.0	
<b>SAMPLE COLLECTION CHECK RESULTS, OCT-DEC 2022</b>									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2440702	0.02	<b>0.28</b>	<b>0.17</b>	<b>0.38</b>	0.02	<b>0.60</b>	141.0	2440703
	2439701	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.0	2439710
	2439702	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	139.5	2437911
	2439703	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	138.0	2436112
	2439709	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	142.0	2434313
<b>Average Range</b>		0.02	0.07	0.05	0.16	0.02	<b>0.20</b>	140.1	<b>Average Range</b>
		0.00	0.26	0.15	0.28	0.00	0.50	4.0	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	1.1	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2440703	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.0	2432514
	2439710	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.0	2430715
	2437911	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.0	2428916
	2436112	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	141.0	2427117
	2434313	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.0	2425318
<b>Average Range</b>		0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	140.2	<b>Average Range</b>
		0.00	0.00	0.00	0.00	0.00	0.00	1.0	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	0.3	
<b>Site Relative Percent Difference</b>		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	0.1	
<b>Reporting Limits</b>		0.02	0.02	0.02	0.10	0.02	0.10	1.0	

Bold numbers are greater than five times the RLs. Results and RLs are reported in mg/L.

**APPENDIX I**  
**SAMPLE COLLECTION CHECK RESULTS, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

<b>SAMPLE COLLECTION CHECK RESULTS, JAN-MAR 2023</b>									
<b>Sampler A</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	<b>Sample #</b>
	2457717	0.02	0.02	<b>0.67</b>	0.10	<b>0.10</b>	<b>0.10</b>	19.0	2457726
	2457718	0.02	0.02	<b>0.67</b>	0.10	<b>0.10</b>	<b>0.10</b>	19.0	2457727
	2457719	0.02	0.02	<b>0.56</b>	0.10	<b>0.10</b>	<b>0.10</b>	19.0	2457728
	2457720	0.02	0.02	<b>0.63</b>	0.10	<b>0.10</b>	<b>0.10</b>	20.0	2457729
	2457721	0.02	0.02	<b>0.66</b>	0.10	<b>0.10</b>	<b>0.10</b>	22.0	2457730
<b>Average Range</b>		0.02	0.02	<b>0.64</b>	0.10	<b>0.10</b>	<b>0.10</b>	19.8	<b>Average Range</b>
		0.00	0.00	0.11	0.00	0.00	0.00	3.0	
<b>Sampler Average Deviation</b>		--	--	3.44	--	--	--	1.0	
<b>Sampler B</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	<b>Sample #</b>
	2457722	0.02	0.02	<b>0.61</b>	0.10	<b>0.10</b>	<b>0.10</b>	21.0	2457731
	2457723	0.02	0.02	<b>0.63</b>	0.10	<b>0.10</b>	<b>0.10</b>	21.0	2457732
	2457724	0.02	0.02	<b>0.60</b>	0.10	<b>0.10</b>	<b>0.10</b>	22.0	2457733
	2457725	0.02	0.02	<b>0.62</b>	0.10	<b>0.10</b>	<b>0.10</b>	20.0	2457734
	2457825	0.02	0.02	<b>0.67</b>	0.10	<b>0.10</b>	<b>0.10</b>	13.0	2457826
<b>Average Range</b>		0.02	0.02	<b>0.63</b>	0.10	<b>0.10</b>	<b>0.10</b>	19.4	<b>Average Range</b>
		0.00	0.00	0.07	0.00	0.00	0.00	9.0	
<b>Sampler Average Deviation</b>		--	--	1.92	--	--	--	2.6	
<b>Site Relative Percent Difference</b>		<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	
		--	--	1.90	--	--	--	2.0	
<b>Reporting Limits</b>		0.02	0.02	0.02	0.10	0.02	0.10	1.0	
<b>SAMPLE COLLECTION CHECK RESULTS, APR-JUN 2023</b>									
<b>Sampler A</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	<b>Sample #</b>
	2474076	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.9	2474073
	2474249	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	3.2	2474236
	2474260	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	3.0	2474238
	2474251	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.2	2474239
	2474252	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	3.2	2474240
<b>Average Range</b>		0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.9	<b>Average Range</b>
		0.00	0.00	0.00	0.00	0.00	0.00	1.0	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	--	
<b>Sampler B</b>	<b>Sample #</b>	<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	<b>Sample #</b>
	2474255	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.0	2474241
	2474254	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.0	2474242
	2474257	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.8	2474243
	2474259	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.0	2474245
	2474250	0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.4	2474246
<b>Average Range</b>		0.02	0.02	0.02	0.10	0.02	<b>0.10</b>	2.2	<b>Average Range</b>
		0.00	0.00	0.00	0.00	0.00	0.00	0.8	
<b>Sampler Average Deviation</b>		--	--	--	--	--	--	--	
<b>Site Relative Percent Difference</b>		<b>Cd</b>	<b>Cr</b>	<b>Cu</b>	<b>Ni</b>	<b>Pb</b>	<b>Zn</b>	<b>TSS</b>	
		--	--	--	--	--	--	--	
<b>Reporting Limits</b>		0.02	0.02	0.02	0.10	0.02	0.10	1.0	

Results are shown only for results greater than 5 times the Reporting Limit. Bold numbers are results at or above the RLs. Results and RLs are reported in mg/L.



## Appendix J. Permittees with Pretreatment Equipment

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
7-Eleven (Stark)	S-601952	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
A & G Electropolish	1-531422	433.17(a)	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	
A & R Powder Coating, Inc.	1-021088	433.17(a)	•	•	•	•	•	•	X	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Accurate Circuit Engineering	1-011138	433.17(a)	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	X	•	•	
Active Plating, Inc.	1-011115	433.17(a)	•	•	•	•	•	X	•	•	X	X	•	•	•	•	•	•	•	•	•	X	•	X	•	•	X	•	•	
Advance-Tech Plating, Inc.	1-021389	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	X	•	•	X	•	X	•	•	X	•	•	
Air Industries Company, A PCC Company (Chapman)	1-031013	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	X	•	•	•	•	
Air Industries Company, A PCC Company (Knott)	1-531404	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)	•	•	X	•	X	X	•	•	X	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	X	X	•	X
Alexander Oil Company	1-581185	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																													
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank		
All Metals Processing of Orange County, LLC	1-031110	433.17(a)	•	•	•	•	•	X	•	•	X	•	•	X	•	•	X	X	•	X	•	•	•	•	•	X	X	•	X		
Allen T. Campbell Trust c/o Bowyer Environmental Consulting, Inc.	S-600341	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•		
Allied Electronics Services, Inc.	1-011073	433.17(a)	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	•	•		
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	464.16(a), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	X	X	X	•	•	•	X	X	•		
Alloy Tech Electropolishing, Inc.	1-011036	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	X	•	X	•		
AlSCO, Inc.	1-021656	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	X	•		
Aluminum Forge - Div. of Alum. Precision	1-071035	467.46, 471.65(i), 471.65(j)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	X	•		
Aluminum Precision Products, Inc. (Central)	1-011038	467.45	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•		
Aluminum Precision Products, Inc. (Susan)	1-011100	467.45, 467.46	•	•	•	•	X	•	•	X	X	•	•	•	•	•	X	•	X	•	•	•	•	X	•	•	X	•	•		
Amerimax Building Products	1-021102	465.35	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		
Ameripecc, Inc.	1-031057	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•		
Anaheim Extrusion Co., Inc.	1-021168	467.35(c)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	X	•	
Andres Technical Plating	1-521798	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	•	•		
AnoChem Coatings	1-600295	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	•		
Anodyne, Inc.	1-511389	433.17(a)	•	•	X	X	X	X	•	•	X	•	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	X

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																												
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Anomil Ent. Dba Danco Metal Surfacing	1-011155	433.17(a)	•	•	X	•	X	X	•	•	X	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	X	•	•	
APCT Anaheim	1-600689	433.17(a)	•	•	•	•	X	•	X	X	X	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	X	•	•
APCT Orange County	1-600503	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	X	•	•
ARO Service	1-021192	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Arrowhead Operating Inc.	1-601062	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Arrowhead Products Corporation	1-031137	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)	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Astech Engineered Products (2)	1-601719	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•
Astech Engineered Products, Inc. (Bldg. 2 Outside)	Z-371320	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Auto-Chlor System of Washington, Inc.	1-511384	417.166	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	



**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Brindle/Thomas - Brooks & Kohlbush	1-531429	435.34(b)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Brindle/Thomas - Catalina & Copeland	1-531430	435.34(b)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Brindle/Thomas - Dabney & Patton	1-531427	435.34(b)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Bristol Industries	1-021226	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)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	•	X	•	•	•	•	•	X	•	•	X	X	X
Brookfield SoCal Land Constructors LLC	S-601020	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Brookfield SoCal Land Constructors LLC	S-601492	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Brothers International Desserts (North)	1-600583	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	
Brothers International Desserts (West)	1-600582	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	
Cadillac Plating, Inc.	1-021062	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	•	X	•	X	•	X	•	•	X	•	•	



**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•
Colores Powder Coating	Z-601858	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Columbine Associates	1-521784	403.5(d)	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	•
Continuous Coating Corporation	1-021290	433.17(a), 465.15	•	•	•	•	X	•	•	X	X	•	•	•	•	X	•	X	X	•	•	•	•	X	•	•	X	•	X	
Corru-Kraft Buena Park	1-600806	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Corru-Kraft Fullerton	1-601450	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•
CP-Carrillo, Inc. (Armstrong)	1-600920	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Crest Coating, Inc.	1-021289	433.17(a)	•	•	•	•	X	•	•	X	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	•	•	•
Custom Enamellers, Inc.	1-021297	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Cytec Engineered Materials	Z-600005	433.17(a)	•	•	•	•	X	X	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•
D.F. Stauffer Biscuit Co., Inc.	1-600414	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Dae Shin USA, Inc.	1-031102	410.56	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Darling Ingredients, Inc.	1-511378	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	•	X	•	X	•	•	•	X
Data Aire, Inc. #2	1-021379	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Data Electronic Services, Inc.	1-011142	433.17(a)	•	•	X	•	X	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	X	
Data Solder, Inc.	1-521761	433.17(a)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	•	•	•
Dayton Flavors, Inc.	1-600038	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
DCOR, LLC	1-111013	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	•
Defense Logistics Agency- Energy (DLA)	S-600944	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•





**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																												
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Embee Processing (Anodize)	1-600456	413.14(c), 413.54(c), 413.64(c), 433.17(a)	.	.	.	.	.	.	X	.	.	.	.	X	X	.	.	.	.	.	X	.	.	X	.	.	.	.	.	.
Embee Processing (Plate)	1-600457	413.14(c), 413.54(c), 413.64(c), 413.74(c), 433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.
Emerald SoCal, LLC / Emerald Orange	1-601615	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.
Excello Circuits, Inc. (Hunter)	1-601356	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.
Expo Dyeing and Finishing, Inc.	1-031322	410.54	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	X	.	.	.	.	.	.
Fabrication Concepts Corporation	1-011068	433.17(a)	.	.	.	.	.	.	X	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Fineline Circuits & Technology, Inc.	1-021121	433.17(a)	.	.	X	.	.	.	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.	X	.	.	X	.	.	.
FMH Aerospace Corp.	1-600585	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	X	.	.	.	.	.	.
G & M Oil Company, Inc. - Station #50	S-053293	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.
Gallade Chemical, Inc.	1-011257	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.	X	.	.	.
Gallade Chemical, Inc.	S-051243	403.5(d)	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Gemtech Coatings	Z-600544	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Gemtech Coatings (Explorer)	1-601761	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
GKN Aerospace Transparency Systems	1-531401	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Gold Coast Baking Company, Inc.	1-601700	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	•	•	
Goodwin Company	1-031043	417.166	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Graphic Packaging International, Inc.	1-571314	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	
Guadalajara Tires Services	S-600976	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	X	•	•	•	•	
Harbor Truck Bodies, Inc.	1-021286	433.17(a)	•	•	•	•	X	•	•	X	X	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	X	•	•	
Harry's Dye & Wash, Inc.	1-521746	403.5(d)	•	•	•	•	•	•	X	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Hartwell Corporation	1-021381	403.5(d)	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Hellman Properties, LLC	1-600273	435.34(b)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Hi Tech Solder	1-521790	433.17(a)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	X	•	•	•	•	•	•	•	X	•	•	
Hightower Plating & Manufacturing Co.	1-021185	433.17(a)	X	•	X	•	X	X	•	•	X	•	•	X	X	•	•	X	X	•	•	•	•	X	•	•	X	•	X	
Hixson Metal Finishing	1-061115	433.17(a)	•	•	•	X	X	X	•	•	X	X	•	X	X	X	•	X	X	X	X	X	•	•	X	•	•	X	•	X
House Foods America Corporation (East)	1-600906	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
House Foods America Corporation (West)	1-031072	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Howmet Aerospace	S-000790	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Howmet Global Fastening Systems Inc.	1-021081	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)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	X	X	X	•	X	X	X	•	X	•	X
Hyatt Die Cast & Engineering Corporation	Z-331236	464.16(a), 464.16(c), 464.16(h), 464.46(b), 464.46(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
Ideal Anodizing, Inc.	1-021041	433.17(a)	•	•	•	•	X	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•
Ikon Powder Coating, Inc.	1-521756	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Image Technology, Inc.	1-521755	417.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	X	•
Independent Forge Company	Z-601008	467.45	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	X	•	•
Industrial Metal Finishing, Inc.	1-521828	403.5(d)	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•
Intec Products, Inc.	1-021399	410.36, 410.46	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•
International Paper Company (Anaheim)	1-521820	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	X	•	•	•	•	•	X	•
International Paper Company (Buena Park Bag)	1-531419	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	X	•
International Paper Company (Buena Park Container)	1-031171	403.5(d)	•	•	•	•	•	•	X	X	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•













**APPENDIX J  
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23  
ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Rich Products Corporation (South)	1-511404	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	X	.	.	.	.	.	.
Rigiflex Technology, Inc.	1-021187	433.17(a)	X	.	X	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	X	.	.	.
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	439.47	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Robinson Pharma, Inc. (Harbor South - H1)	1-511412	439.47	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Rolls-Royce High Temperature Composites, Inc.	1-600212	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.
Rolls-Royce High Temperature Composites, Inc. (Fume Scrubber)	1-600213	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.
Rountree / Wright Enterprises, LLC	1-111028	403.5(d)	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	X	X	.	.	.	.	.	.
S & C Oil Company, Inc. (2)	1-601637	403.5(d)	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.
Sabic Innovative Plastics, US, LLC	S-057284	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	X	.	.	.	.	.	.	.	.	X	.
Safety-Kleen Systems, Inc.	1-600690	403.5(d)	.	.	X	.	.	.	X	.	.	.	.	.	.	.	.	X	.	.	.	.	X	.	.	.	.	.	.
Sanmina Corporation (Airway)	1-061008	433.17(a)	.	.	X	.	X	.	.	X	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	X	.	.
Sanmina Corporation (Redhill)	1-061009	433.17(a)	.	.	.	.	.	X	.	.	.	.	.	.	X	.	X	.	.	.	.	X	.	.	.	.	X	.	.
Santana Services	1-021016	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Scientific Spray Finishes, Inc.	1-031311	433.17(a)	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.





**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																													
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank		
Summit Interconnect, Inc.	1-600012	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	X	X	X	.	.	X	.	.	.	.	.	.	.	.	X	.	.
Summit Interconnect, Inc., Orange Division	1-600060	433.17(a)	.	.	X	.	.	.	X	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	X	X	X	X	
Sunny Delight Beverages Co.	1-021045	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	X	.	.	.	.	
Superior Connector Plating, Inc.	1-021090	433.17(a)	.	.	.	.	X	X	.	.	X	.	.	X	X	.	.	X	.	.	X	.	.	X	.	X	X	X	.	.	
Superior Processing (2)	1-601701	433.17(a)	.	.	X	.	.	.	.	.	.	.	X	.	X	.	X	.	.	.	.	.	X	.	.	.	.	.	.	.	
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	403.5(d)	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	432.126, 432.56	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	
Tayco Engineering, Inc.	1-031012	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.	.	.	X	X	.	
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	
Terra Universal, Inc.	1-601407	433.17(a)	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.	.	.	.	.	.	
The Irvine Company LLC dba California Recreation Company	S-601993	403.5(d)	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	
Thermal-Vac Technology, Inc.	1-021282	433.17(a)	.	.	X	.	.	.	.	.	.	.	.	.	X	.	X	X	X	.	.	.	.	.	.	.	.	.	.	.	
Thompson Energy Resources, LLC (Brea)	1-601469	435.34(b)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	
Thrifty Oil Company #150	S-000197	403.5(d)	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	X	.	X	.	.	.	.	.	
Timken Bearing Inspection, Inc.	1-531415	433.17(a)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	X	.	.	X	.	.	.	.	
Tiodize Company, Inc.	1-111132	433.17(a)	.	.	.	.	X	X	.	X	.	.	.	.	.	X	.	X	.	.	.	.	X	.	.	X	.	X	.	X	

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Toyota Racing Development, USA, Inc.	1-071059	403.5(d)	.	X	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.
Transline Technology, Inc.	1-021202	433.17(a)	.	.	X	.	X	.	.	.	.	.	.	.	X	.	X	X	.	.	.	.	.	.	.	.	X	.	.
Tropitone Furniture Co., Inc.	1-141163	433.17(a)	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
TTM Technologies North America, LLC. (Coronado)	1-521859	433.17(a)	X	X	.	.	X	.	.	.	.	.	.	.	X	.	.	X	.	.	.	.	.	.	.	.	.	.	.
TTM Technologies North America, LLC. (Croddy)	1-511366	433.17(a)	.	.	.	.	X	.	.	X	.	.	.	.	.	.	X	.	.	.	X	.	X	.	.	X	.	X	
TTM Technologies North America, LLC. (Harbor)	1-511359	433.17(a)	.	.	.	.	.	.	.	X	.	.	.	.	.	.	X	X	.	X	.	.	.	.	.	X	.	X	
U.S. Department of the Navy BRAC PMO West (North)	S-057256	403.5(d)	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
United Pharma, LLC	1-531418	439.47	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Universal Molding Co.	1-521836	433.17(a)	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	X	.	X	X	.	.	.	X	X	.	.	.
Van Law Food Products, Inc.	1-600810	403.5(d)	.	.	.	.	.	.	X	.	.	X	.	.	.	.	.	.	.	.	.	X	.	.	X	.	.	.	.
Venus Laboratories, Inc. dba Earth Friendly Products	1-600739	417.166, 417.86	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	X	.	.	.	.	.	.	.	.	.
Vi-Cal Metals, Inc.	1-521846	403.5(d)	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	X	.	.	.	.	X	X	.	.	.	.	.
Warner Avenue Group, LLC.	S-601116	403.5(d)	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	X	.	.	.	.	.
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.

**APPENDIX J**  
**PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2022/23**  
**ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																																		
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank							
Weber Precision Graphics	1-011354	403.5(d)	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	403.5(d)	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.		
West Newport Oil Company	1-061110	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	
Western Pacific Distributing, LLC	2-022370	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	
Wilco-Placentia Oil Operator, LLC	1-521829	435.34(b)	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	
Winonics (Brea)	1-031035	433.17(a)	.	.	.	.	X	.	.	X	.	.	.	.	.	.	X	.	.	.	X	.	X	.	X	.	.	.	.	X	.	.	X	.		
Winonics LLC. dba Bench 2 Bench Technologies	1-601974	433.17(a)	.	.	.	.	X	.	.	X	X	.	.	.	.	.	X	.	.	X	X	.	.	.	.	.	.	.	.	X	.	.	.	.	.	
Winonics, Inc.	1-021735	433.17(a)	.	.	.	.	X	.	.	X	X	.	.	.	.	X	.	.	X	X	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	
Yakult USA, Inc.	1-521850	403.5(d)	.	.	.	.	.	.	.	.	.	.	.	.	X	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.

10844 Ellis Avenue  
Fountain Valley, California 92708-7018  
714.962.2411 | [www.ocsan.gov](http://www.ocsan.gov)

