

2020-21

Annual Report

RESOURCE PROTECTION DIVISION

PRETREATMENT PROGRAM



October 28, 2021

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. R8-2012-0035, NPDES No. CA0110604
FY 2020/21 Pretreatment Program Annual Report

In accordance with the requirements of NPDES Permit No. CA0110604, attached please find the FY 2020/21 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, 2020 through June 30, 2021.

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 84% 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 2020/21, 1,664 inspections of facilities were conducted, and 3,515 samples were collected for analysis. In addition to warning notices and self-monitoring notices, 304 separate enforcement actions were taken against noncompliant industries in FY 2020/21, including compliance meetings and inspections, and the issuance of fees, penalties, enforcement orders and administrative complaint settlements. Over \$74,439 in noncompliance fees and penalties were issued.
- ▶ During FY 2020/21, 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) 593-7450.



Lan Wiborg
Director of Environmental Services

JAD:aps

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

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Water District
Yorba Linda
Water District

October 28, 2021

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California Regional Water Quality Control Board
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3737 Main Street, Suite 500
Riverside, CA 92501-3339

Subject: Board Order No. R8-2012-0035, NPDES No. CA0110604
Pretreatment Program Semi-Annual Report for the Period of January 1 through
June 30, 2021

As authorized by NPDES Permit No. CA0110604, the Pretreatment Program Semi-Annual Report information for January 1 through June 30, 2021 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, 2020 through June 30, 2021. 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) 593-7450. '



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**POTW PRETREATMENT PROGRAM ANNUAL REPORT
CERTIFICATION STATEMENT**

NPDES Permit Holder: Orange County Sanitation District
Report Due Date: October 31, 2021
Period Covered by this Report: July 2020 through June 2021
Period Covered by Previous Report: July 2019 through June 2020*
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:

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- Mailing Address: 10844 Ellis Avenue
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- Telephone: (714) 593-7450

"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 28, 2021
Date


Lan Wiborg, Director of Environmental Services

Table of Contents

List of Tables.....	i
List of Figures.....	ii
List of Appendices.....	ii
List of Abbreviations.....	iii
Glossary of Defined Terms	vi
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 Headworks Modifications for GWRS Final Expansion	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.....	2.10
2.7 Mass Emission Benchmarks	2.10

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	4.5
4.6.2 Compliance Meetings.....	4.5
4.6.3 Compliance Requirement Letters.....	4.5
4.6.4 Order to Cease/Terminate Noncompliance/Discharge	4.5
4.6.5 Notices of Violation – Noncompliance Fees and Penalties	4.5
4.6.6 Probation Orders	4.6
4.6.7 Enforcement Compliance Schedule Agreement.....	4.6
4.6.8 Regulatory Compliance Schedule Agreement (RCSA).....	4.6
4.6.9 Administrative Complaints, Penalties, and Settlement Agreements.....	4.6
4.6.10 Permit Suspensions	4.7
4.6.11 Permit Revocations	4.7
4.6.12 Emergency Suspension Order	4.7
4.6.13 Civil/Criminal Complaints	4.7
4.7 Enforcement Summary	4.7
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	6.12
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	Significant Changes in Operating the Pretreatment Program.....	6.13
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	Report of Upset, Pass-Through and Interference Events.....	7.6
7.3.6	Discussion of the List of Industrial Users	7.6
7.3.7	Discussion of Industrial User Compliance Status	7.9
7.3.8	Summary of SIU Compliance.....	7.9
7.3.9	Discussion of Significant Changes in the Pretreatment Program	7.9
7.3.10	Pretreatment Program Costs	7.9
7.3.11	Equipment Purchases for FY 2020-2021	7.10
7.3.12	Discussion of Public Participation Activities.....	7.10
7.3.13	Discussion of Biosolids Treatment and Recycling Activities	7.10
7.3.14	IRWD Additional Information.....	7.11

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)	7.16
7.4.2.5	San Bernardino Municipal Water Department (SBMWD)	7.16
7.4.2.6	San Bernardino Valley Municipal Water District (Valley District)	7.18
7.4.2.7	Santa Ana Watershed Project Authority (SAWPA)	7.19
7.4.2.8	Western Municipal Water District (Western)	7.22
7.4.2.9	Yucaipa Valley Water District (YVWD)	7.23
7.4.3	Self-Monitoring Program	7.24
7.4.4	Field Inspection, Sampling, and Monitoring QA/QC	7.24
7.4.5	Identification of New Permittees	7.24
7.4.6	Future Projects That Will Affect Quantity of Discharge to the Brine Line	7.26
7.4.7	SAWPA Special Projects	7.27
7.4.8	SAWPA Member and Contract Agency Ordinances and Resolutions	7.27
7.4.9	Public Participation	7.28
7.4.10	Permittees in Significant Noncompliance	7.28
7.4.10.1	Summary of Permittees in SNC Newspaper Notice	7.28
7.4.11	Non-Industrial Source Control and Public Education Programs	7.28
7.4.12	Other Public Participation	7.29
7.4.13	Changes to the SAWPA Pretreatment Program	7.30
7.4.14	Pretreatment Program Budget	7.31
7.4.15	Equipment Inventory Listing	7.32
7.4.16	SAWPA Pretreatment Program Training	7.33
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 Programs	9.1
9.2.1	Fats, Oils, and Grease Control	9.1
9.3	Radiator Shops	9.3
9.4	Dry Cleaners	9.4
9.5	Dry Weather Urban Runoff Diversions	9.4
9.5.1	Dry Weather Diversion Systems and Urban Runoff Flow	9.5
9.5.2	Proposed Dry Weather Urban Runoff Diversion Systems	9.8

9.5.3	Dry Weather Urban Runoff Quality	9.9
9.5.4	Dry Weather Urban Runoff Diversion Locations	9.10
9.6	Dental Amalgam.....	9.10
9.7	Public Education and Outreach.....	9.11

List of Tables

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2020/21 2.2

Table 2.2 NPDES Permit Discharge Requirements and OC San’s Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2020/21 2.6

Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2016/17 – 2020/21 2.7

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2017- 2021 2.8

Table 2.5 Final Effluent Yearly Average Toxicity Results for Fiscal Years 2016/17-2020/21 2.9

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2017-2021 2.10

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2020/21 2.12

Table 3.1 OC San’s Maximum Allowable Local Discharge Limits 3.3

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 2016/17-2020/21 4.1

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) 4.4

Table 5.1 Summary of Total Costs and Total Labor for the Pretreatment Program, Fiscal Years 2016/17 – 2020/21 5.1

Table 5.2. Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2020/21 5.2

Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2016/17-2020/21 6.2

Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2020/21 6.2

Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San’s Disposal Station, FY 2016/17-2020/21 6.2

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2020/21 6.4

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2020/21 6.5

Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2020/21 6.6

Table 6.7 Permittees with TTO Waivers July 1, 2020 – June 30, 2021 6.7

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas 7.6

Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2019-2020 and 2020-2021 7.9

Table 7.3 Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2020-2021 7.10

Table 7.4 Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2020 – June 30, 2021 7.28

Table 7.5 Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2020/21 7.33

Table 8.1. Trends in Trace Metal Content of Biosolids, Fiscal Years 2011/12-2020/21, in Milligrams per Dry Kilogram 8.1

Table 9.1 Non-Industrial Source Control Programs, FY 2020/21 9.1

Table 9.2 FOG Program Effectiveness, FY 2020/21 9.3

Table 9.3 Dry Weather Urban Runoff Discharges, FY 2015/16 – 2020/21 9.6

Table 9.4	Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2020/21	9.7
Table 9.5	Dry Weather Urban Runoff Diversion Program, FY 2020/21	9.8
Table 9.6	Dry Weather Urban Runoff Compliance, FY 2020/21	9.9

List of Figures

Figure ES-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.....	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 Total Toxic Organics	7.6
Figure 7-6	MWRP Influent Flow	7.11
Figure 7-7	MWRP Influent and Effluent Selenium.....	7.12
Figure 8-1	Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2020/21	8.4
Figure 8-2	Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2020/21.....	8.4
Figure 8-3	Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2020/21	8.5
Figure 8-4	Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2020/21	8.5
Figure 8-5	Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2020/21	8.6
Figure 8-6	Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2020/21	8.6
Figure 8-7	Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2020/21	8.7
Figure 8-8	Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2020/21	8.7
Figure 8-9	Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2020/21	8.8
Figure 8-10	Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2020/21	8.8

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

Acronym or abbreviation	Full phrase	Glossary
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 Enhances Primary Treatment	
CGS	Central Power Generation System	
CIP	Clean in Place	
CIU	Categorical Industrial Users	
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	
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	Inductive 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 Service District	
JPA	Joint Powers Authority	
LACSD	Los Angeles County Sanitation District	
LAWD	Los Alisos Water District	

Acronym or abbreviation	Full phrase	Glossary
LWH	Liquid Waste Haulers	
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	
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 of Existing Sources	
PSNS	Pretreatment Standards of New Sources	
PTP	Potable Treatment Plant	
PTS	pretreatment systems	
RAS	Return Activated Sludge	
RCSA	Regulatory Compliance Schedule Agreement	
RL	reporting limit	
RO	reverse osmosis	
RPD	relative percent difference	
SARI	Santa Ana River Interceptor	
SARWQCB	Santa Ana Regional Water Quality Control Board	
SAWPA	Santa Ana Watershed Project Authority	
SBMWD	San Bernardino Municipal Water Department	

Acronym or abbreviation	Full phrase	Glossary
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	
TDS	Total Dissolved Solids	
TMDL	Total Maximum Daily Load	
TOMP	Toxic Organic Management Plan	
TRC	Technical Review Criteria	
TSS	Total Suspended Solids	
TTOs	Total Toxic Organics	✓
Valley District	San Bernardino Valley Municipal Water District	
WDR	Waste Discharge Requirements	
Western, WMWD	Western Municipal Water District	
WRCWRA 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

Term	Definition	Citation
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
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

Term	Definition	Citation
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, 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, 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 among other sections of the Ordinance, but with no change to the local discharge limits.

E.2 Introduction

The fiscal year (FY) 2020/21 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 84% 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).

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.

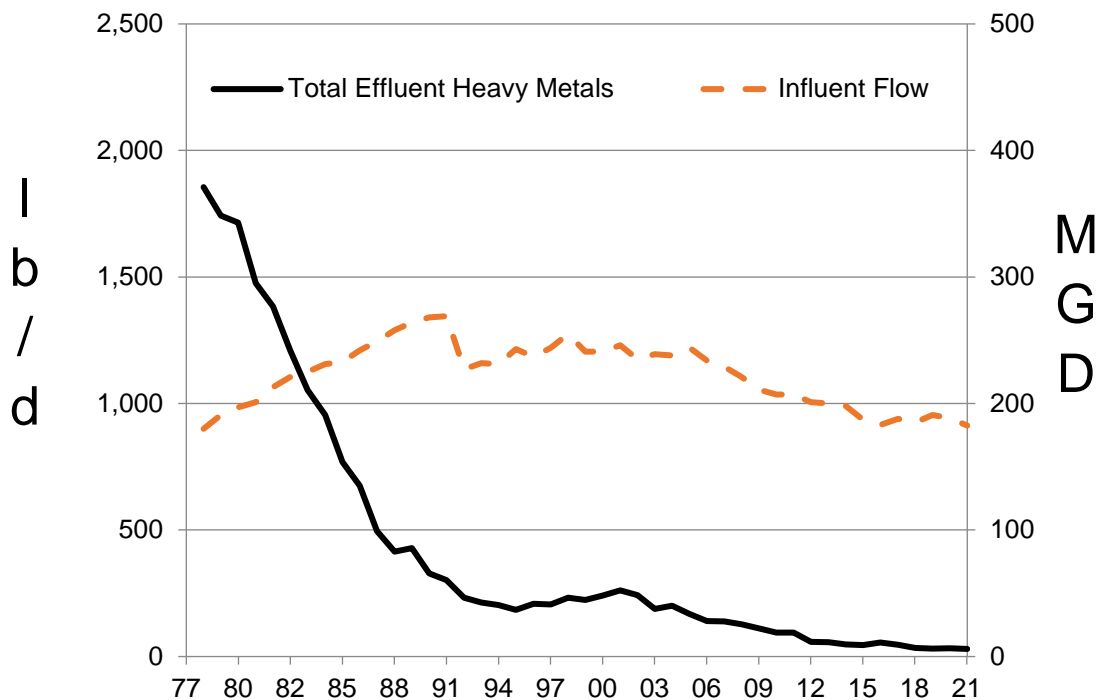


Figure ES-1 Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years
Orange County Sanitation District, Resource Protection Division

Permits

During FY 2020/21 OC San managed 550 active permits, of which there were 338 Class I permits, 19 Class II permits, 44 Wastehauler permits, one discharge certification, 56 Special Purpose Discharge permits, 21 Dry Weather Urban Runoff Diversion permits, 37 FOG (fats, oils, and grease) permits, and 34 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 338 Class I users, 182 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 \$6,630,445. A total revenue of \$17,870,747 in sewer use charge payments was received and over \$74,439 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 1,664 industrial inspections during the fiscal year, with the collection of 3,515 samples. 45 compliance inspections and 19 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. 22 SIU permittees of the 338 (6.5%) that were active in FY 2020/21 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 2020/21.

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. Working with other agencies and associations benefits OC San by keeping abreast of potential future regulation 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. Please see Chapter 9 for more information.

Wastehauler Program

During FY 2020/21, 44 wastehaulers were under permit with OC San, having a total of 152 trucks. During the past fiscal year, 10.0 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 2020/21 OC San granted 118 companies TTO waivers.

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 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.

Non-Industrial Source Control Program

The purpose of OC San's Non-Industrial Source Control (NISC) Program is to promote and implement the application of waste management strategies and practices that will reduce or eliminate the generation of waste at the source, thereby reducing the volume and toxicity of waste streams entering OC San's sewerage system. The NISC Program also addresses non-industrial pollution sources in our commercial and residential discharger community, 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 2020/21.

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. R8-2012-0035, effective July 20, 2012, jointly issued by the SARWQCB and US EPA Region IX. The requirements for the industrial pretreatment program are listed in Section VI (C)(4)(c) and Attachment E of the permit. The requirements are shown below, using the appropriate numeration found in the permit. Each requirement is followed by a summary of the activity that has resulted in OC San's compliance with the permit requirements, or a reference may be given where additional information can be found in this annual report.

NPDES Section VI. Provisions, C. Special Provisions, 4. Special Provisions for Municipal Facilities (POTWs Only), c. Pretreatment Program Requirements

(2) The Discharger shall implement and enforce its approved pretreatment program, and all subsequent revisions, which are hereby made enforceable conditions of this Order/Permit. The Discharger shall enforce the requirements promulgated pursuant to Clean Water Act (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 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) ensures compliance with federal, state, and local regulations. The compliance statuses of all permittees subject to federal categorical standards are shown in the fiscal year 2020-2021 List of SIUs with Monitoring & Compliance Status, presented in Appendix A of this report.

(3) The Discharger shall perform the pretreatment functions required by 40 CFR Part 403, including but not limited to:

(a) Implement the necessary legal authorities as required by 40 CFR 403.8(f)(1).

The legal authorities are contained in OC San's July 1983 Ordinance which were approved by US EPA in January 1984, and affirmed during the May 1986 audit. Revised versions of *Wastewater Discharge Regulations* 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.

(b) 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 2020/21.

(c) Implement the programmatic functions as required by 40 CFR 403.8(f)(2).

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 2020/21.

(d) 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 2020/21, including laboratory analyses, total \$6,630,445. Chapter 5 of this report provides additional details.

(4) By October 31 of each year, the Discharger shall submit an annual pretreatment report to the Regional Water Board, US EPA, the State Water Board's Division of Water Quality-Regulations Unit, and the Orange County Department of Health Services' Hazardous Materials Division, describing its pretreatment activities over the previous fiscal year (July 1 through June 30). In the event the Discharger is not in compliance with any condition or requirement of this Order/Permit, or any pretreatment compliance inspection/audit requirements, the Discharger shall include the reasons for noncompliance and state how and when it will comply with such conditions and requirements. The annual report shall contain, but not be limited to, the following information:

(a) A summary of analytical results from representative, flow-proportioned, 24-hour composite sampling of the Discharger's influent and effluent for those pollutants US EPA has identified under CWA section 307(a) which are known or suspected to be discharged by nondomestic users. Representative grab sampling shall be employed for pollutants that may degrade after collection, or where the use of automatic sampling equipment may otherwise result in unrepresentative sampling; such pollutants include, but are not limited to, cyanide, oil and grease, volatile organic compounds, chlorine, phenol, sulfide, pH, and temperature. Wastewater sampling and analysis shall be performed in accordance with the minimum frequency of analysis required by the MRP (Attachment E). The Discharger shall also provide influent and effluent monitoring data for non-priority pollutants, which the Discharger believes may be causing or contributing to interference or pass through. The Discharger is not required to sample and analyze for asbestos. Sludge sampling and analysis is addressed elsewhere in this Order/Permit. Wastewater sampling and analysis shall be performed in accordance with 40 CFR 136.

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

(b) A discussion of upset, interference, or pass through, if any, at the Discharger's facilities, which the Discharger knows or suspects were caused by nondomestic users of the Publicly Owned Treatment Works (POTW) system. The discussion shall include the reasons why the incidents occurred, any corrective actions taken, and, if known, the name and address of the responsible nondomestic user(s). The discussion shall also include a review of the applicable local pollutant limitations to determine whether any additional limitations, or changes to existing limitations, are necessary to prevent pass-through, interference, or noncompliance with sludge disposal requirements.

There were no plant upsets, interference, or pass-through incidents attributable to industrial users in FY 2020/21.

(c) An updated list of the Discharger's 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, is an updated list of significant industrial users which identifies which local or set of categorical standards apply to each SIU.

(d) The Discharger shall characterize the compliance status of each SIU by providing a list or table for the following:

Name of SIU;

Category, if subject to categorical standards;

Type of wastewater treatment or control processes in place;

Number of samples taken by SIU during the year;

Number of samples and inspections by Discharger during the year;

For an SIU subject to discharge requirements for total toxic organics, whether all required certifications were provided;

A list of pretreatment standards (categorical or local) violated during the year, or any other violations;

SIUs in significant noncompliance (SNC) as defined at 40 CFR 403.8(f)(2)(viii), at any time during the year;

A summary of enforcement actions or any other actions taken against SIUs during the year. Describe the type of action, final compliance date, and the amount of fines and/or penalties collected, if any. Describe any proposed actions for bringing SIUs into compliance.

The annual report contains all of the 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.

(e) A brief description of any programs the Discharger implements to reduce pollutants from nondomestic users 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.

(f) A brief description of any significant changes in operating the pretreatment program which differ from the previous year, including, but not limited to, changes in the program's administrative structure, local limits, monitoring program, legal authority, enforcement policy, funding, and staffing levels.

The description of significant changes to the pretreatment program, if any, are discussed in Chapter 6.

(g) A summary of the annual pretreatment program budget, including the cost of pretreatment program functions and equipment purchases.

For FY 2020/21, the operating expenses for the pretreatment program were approximately \$6,630,445. Additional information on pretreatment program costs and purchases are shown in Chapter 5 of this report.

(h) A summary of activities to involve and inform the public of the pretreatment program, including a copy of the newspaper notice, if any, required by 40 CFR 403.8(f)(2)(vii)[sic].

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

(i) A description of any changes in sludge disposal methods.

Biosolids information can be found in Chapter 8 of this report.

(j) A description of the program to quantify, characterize, regulate, and treat flow from low-flow urban runoff diversion systems and "first flush" industrial storm water diversion systems that are routed to the sanitary sewer collection system.

Information on OC San's Dry Weather Urban Runoff Diversion Program is shown in Chapter 9 of this report.

(k) A discussion of any concerns not described elsewhere in the annual report.

There were no concerns for FY 2020/21.

(6) Nonindustrial Source Control Program and Public Education Program

The discharger shall continue to develop and implement its nonindustrial source control program and public education program. The purpose of these programs is to eliminate the entrance of nonindustrial toxic pollutants and pesticides into the POTW. The nonindustrial source control program will be supplemented with an updated survey of industrial and nonindustrial contaminant sources. These programs shall be periodically reviewed and addressed in the annual report.

The non-industrial source control program (NISC) information can be found in Chapter 9 of this annual report.

Attachment E, Section VII. Effluent Mass Emission Benchmarks

The following mass emission benchmarks [Table E-5] have been established for the effluent discharge. For each parameter with a mass emission benchmark, the Discharger 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).

The mass emission benchmark information is contained in Chapter 2 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, 2020 through June 30, 2021 (FY 2020/21). 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 OC San's NPDES permit, or directed to the Orange County Water District (OCWD) for reclamation. Approximately 124 million gallons per day (MGD) of treated wastewater was routed to facilities operated by OCWD during FY 2020/21. 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. Phase II of GWRS continues to produce 100 MGD of reclaimed water.

During FY 2020/21, OC San beneficially recycled 100% of the dewatered biosolids for use as agricultural soil amendments and compost products. Total biosolids production for this fiscal year was approximately 199,222 wet tons, a 6% reduction from 211,629 wet tons in 2019/20. This is mainly due to higher solids separation from the new centrifuge operations at Plant No. 1 and Plant No. 2 starting early 2019. As such, solids content was 23.5% for Plant No. 1 and 27.6% for Plant No. 2. Two management options (land application and composting) were utilized through five vendor contracts in two states and four counties. OC San's Biosolids Management Compliance Report for calendar year 2020 describes the solids and management program in more detail (www.ocsan.gov/503). Grit and screenings are transported under contract for landfill disposal. Debris and grit removed from the sewers during cleaning is dried at Plant No. 1 and then hauled to a 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.

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2020/21 Orange County Sanitation District, Resource Protection Division					
FY	Influent (MGD)	Effluent (MGD)	FY	Influent (MGD)	Effluent (MGD)
1997	244	242	2010	207	152
1998	255 ^c	255	2011	207	152
1999	241	239	2012	201	139
2000	241	236	2013	200	137
2001	246	244	2014	198	137
2002	235	231	2015	187	117
2003	239	235	2016	183	92
2004	238	238	2017	188	101
2005	244	247 ^b	2018	185	88
2006	234	235	2019	191	104
2007	229	232 ^b	2020	188	101
2008	221 ^a	212 ^d	2021	182	91
2009	211 ^a	167			

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 Nino (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 not overload the capacity at Plant No. 1 and also to provide for maintenance and construction activities. The metering and diversion structure also contains pH meters, conductivity meters, 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 2020/21, 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 124 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) all three engines operate during peak hours to reduce Southern California Edison (SCE) electricity cost. Supplemental power was purchased from 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 meters, conductivity meters, 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. Only three engine generators are usually operated at any one time based on digester gas availability. 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

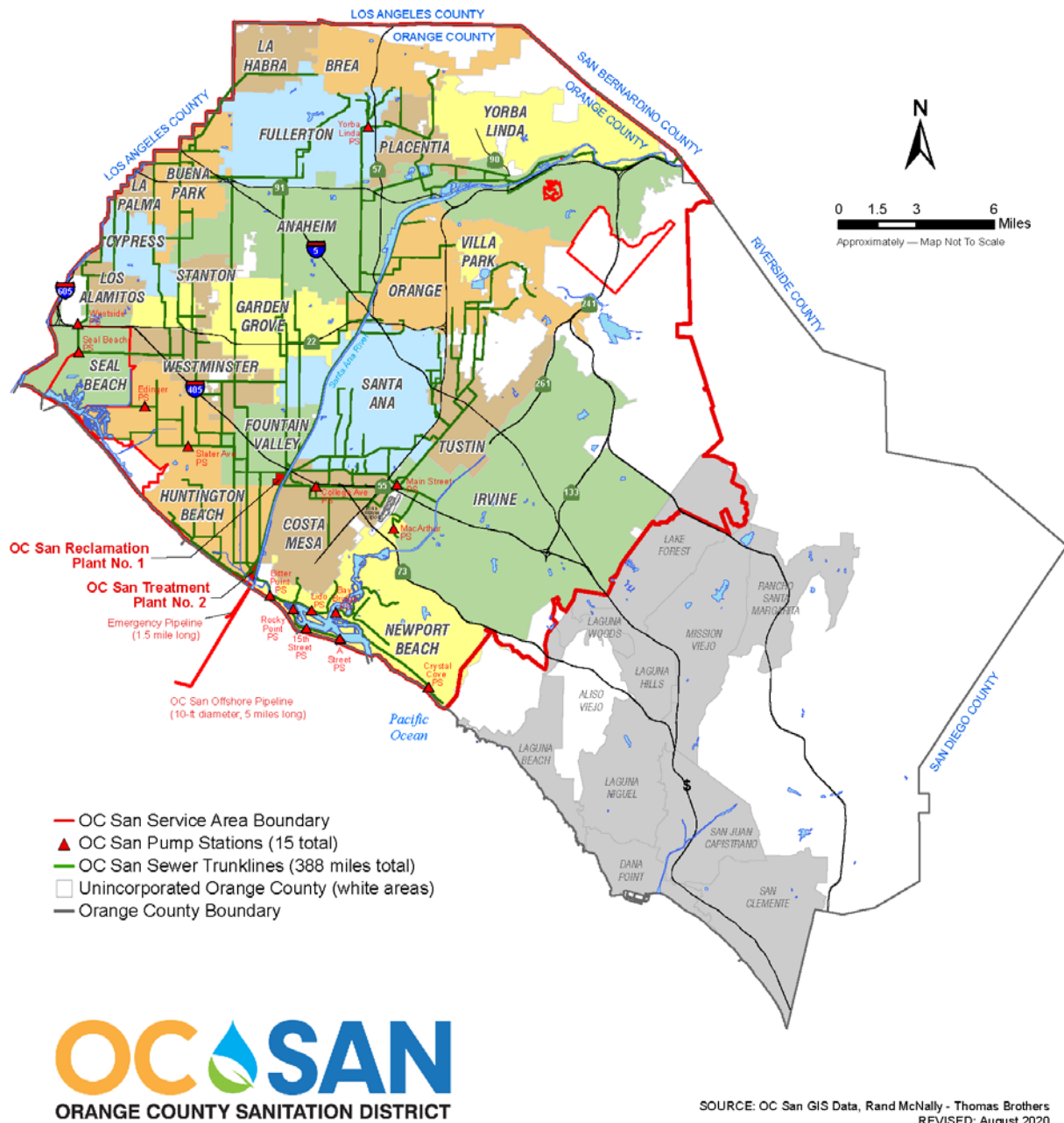


Figure 2-1 Map of Orange County Sanitation District's Service Area
Orange County Sanitation District, Resource Protection Division

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 250:1). During FY 2020/21 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. R8-2012-0035, NPDES Permit No. CA0110604, effective on July 20, 2012). 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 2020/21
Orange County Sanitation District, Resource Protection Division

Constituent	OC San's Combined Influent Annual Average	NPDES Permit Discharge Requirement			Final Effluent Annual Average ^A	OC San's Compliance with NPDES Permit Limits
		30-Day Average	7-Day Average	Daily Maximum		
Flow (MGD)	182	--	--	--	91	NA
BOD-C (mg/L)	211	25	40	--	6.4	Yes
BOD-C (lb/d)	--	57,129	91,406	--	4858	Yes
BOD-C (percent removal)	--	>85 ^B	--	--	96.6	Yes
Suspended solids (mg/L)	315	30	45	--	5.4	Yes
Suspended solids (lb/d)	--	68,555	102,832	--	4116	Yes
TSS (percent removal)	--	>75 ^B	--	--	99	Yes
Grease and oil (mg/L)	33.4	25	40	75	0.2	Yes
Grease and oil (lb/d)	--	57,129	91,406	171,387	183	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	3.0	Yes
pH	7.8 (P1), 8.0 (P2)	6.0 to 9.0	6.0 to 9.0	9.0	8.1	Yes
Total Chlorine Residual (mg/L)	--	0.36 ^C	--	1.45	0.09 ^C	Yes
Total Chlorine Residual (lb/d)	--	823 ^C	--	3,313	62 ^C	Yes
Benzidine (µg/L)	ND	0.01249	--	--	ND	Yes
Benzidine (lb/d)	--	0.0285	--	--	--	Yes
Chlordane (µg/L)	ND	0.00416	--	--	ND	Yes
Chlordane (lb/d)	--	0.0097	--	--	--	Yes
3,3-dichlorobenzidine (µg/L)	ND	1.4661	--	--	ND	Yes
3,3-dichlorobenzidine (lb/d)	--	3.3992	--	--	--	Yes
Hexachlorobenzene (µg/L)	ND	0.0380	--	--	ND	Yes
Hexachlorobenzene (lb/d)	--	0.0868	--	--	--	Yes
PAHs (µg/L)	ND	1.5928	--	--	ND	Yes
PAHs (lb/d)	--	3.6929	--	--	--	Yes
PCBs (µg/L)	ND	0.0034	--	--	ND	Yes
PCBs (lb/d)	--	0.0078	--	--	--	Yes
TCDD equivalents (pg/L)	NR	0.706	--	--	ND	Yes
TCDD equivalents (Mlb/d) ^D	--	0.001613	--	--	--	Yes
Toxaphene (µg/L)	NR	0.03801	--	--	ND	Yes
Toxaphene (lb/d)	--	0.0869	--	--	--	Yes

Additional influent/effluent data is shown in Appendix B

-- Not determined

^A Based on the average of the values reported in the monthly Discharge Monitoring Report. For values based on 30-day rolling maximum averages, refer to the Benchmark section of the Source Control and Ocean Monitoring Annual Reports.

^B Monthly average minimum

^C 6-month median

^D Mlb/d = 1000 lb/day

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 2020/21, the suspended solids discharge was in compliance with OC San's NPDES permit effluent limits. The final effluent monthly average suspended solids concentration of 5.4 milligrams per liter (mg/L) for a monthly average discharge mass emissions rate of 4,116 pounds per day (lb/d) during FY 2020/21 is 18% of the allowable 30-day average concentration limit of 30 mg/L, and 6.0% of the mass emissions limit of 68,555 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 2020/21. The final effluent 30-day average for FY 2020/21 was 6.4 mg/L with a removal rate of 97%. A summary of the carbonaceous BOD data for the past five years is shown in Table 2.3.

Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2016/17 – 2020/21 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
2016/17	396	620,900	5.3	4,500	212	332,400	4.8	4,000
2017/18	396	611,000	5.0	3,700	220	339,400	4.4	3,200
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

2.4.4 Oil and Grease

The NPDES 30-day effluent limit for oil and grease is 25 mg/L and 57,129 lb/d. Average oil and grease was measured at 0.2 mg/L in the treated effluent during this fiscal year.

2.4.5 Settleable Solids

The 30-day average permit 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 2020/21 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 2020/21 average turbidity was 3.0 NTU. A summary of the turbidity data for the past five years is shown in Table 2.4.

2.4.7 pH

Pursuant to OC San's NPDES permit, the pH of the ocean discharge shall neither exceed 9.0 nor be less than 6.0. The effluent was in compliance throughout FY 2020/21. The annual mean pH was 8.1, which is well within the high and low pH effluent limits. The ocean discharge pH has remained relatively constant over the past five years, as summarized in Table 2.4.

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2017-2021 Orange County Sanitation District, Resource Protection Division			
FY	Settleable Solids (mL/L)	Turbidity (NTU)	pH
2016-17	ND	3.1	8.1
2017-18	ND	3.4	8.0
2018-19	ND	2.5	8.0
2019-20	ND	2.4	8.1
2020-21	ND	3.0	8.1

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 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 are most sensitive to the effluent. The most sensitive test species are then used as the test organisms for monthly and quarterly testing. In October 2020, acute toxicity tests were performed to determine the more sensitive of the acute test species: Topsmelt (*Atherinops affinis*) and mysid crustacean *Americamysis bahia*. The tests demonstrated that Topsmelt was the more sensitive species for the acute test. All FY 2020/21 quarterly acute tests utilized Topsmelt.

In October 2020, chronic toxicity tests were performed to determine the most sensitive of three chronic test species: giant kelp (*Macrocystis pyrifera*), purple sea urchin (*Strongylocentrotus purpuratus*), and Topsmelt (*Atherinops affinis*). The tests demonstrated that purple sea urchin was the more sensitive species for the chronic test. All FY 2020/21 monthly chronic tests utilized purple sea urchin.

Table 2.5 summarizes the toxicity testing results for FY 2016/17 through FY 2020/21. All FY 2020/21 acute (n=4 tests) and chronic (n=12) toxicity tests passed indicating no final effluent toxicity.

Table 2.5 Final Effluent Yearly Average Toxicity Results for Fiscal Years 2016/17-2020/21 Orange County Sanitation District, Resource Protection Division		
FY	Test Species	Summary of Toxicity Results
2016/17 ⁽¹⁾	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>A. affinis</i> & <i>S. purpuratus</i>)	Pass
2017/18	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass
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

⁽¹⁾ FY 2016/17 monthly chronic testing was conducted using Topsmelt from July 2016 to October 2016 and the purple sea urchin from November 2016 to June 2017.

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 Headworks Modifications for GWRS Final Expansion

Construction for Project No. P2-122 will work to modify headworks and sidestream routing to create separate treatment trains for reclaimable and non-reclaimable flows to support the GWRS Final Expansion. With modified flows, the construction of this project will also replace three out of the seven Main Sewage Pumps (MSPs) with more efficient lower capacity pumps. The Trickling Filter Solids Contact/Sludge Reaeration (SC/SR) process will treat the reclaimable stream and the Activated Sludge (AS) process will treat the non-reclaimable stream. This project will not only provide OCWD with additional flow but will also increase OC San's flexibility to route flows between Plant No. 1 and Plant No. 2.

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 reclaimable flows to be sent to OCWD to support the GWRS Final Expansion. As a result of reduced flows through the Ocean Outfall System, the construction of the Outfall Low Flow Pump Station under Project No. J-117B will convey daily flows to the ocean outfall. The Ocean Outfall Booster Station (OOBS) will be rehabilitated with respect to proposed flow changes and updates to aging equipment. A new Plant Water Pump Station (PWPS) will also be constructed to draw flow from the Trickling Filter Solids Contact (TFSC) secondary effluent.

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.

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2017-2021 Orange County Sanitation District, Resource Protection Division											
Constituent	INFLUENT					EFFLUENT					
	16-17	17-18	18-19	19-20	20-21	16-17	17-18	18-19	19-20	20-21	
Cadmium	2	2	2	1	0.6	ND	0.02	ND	0.02	ND	
Chromium	13	12	12	11	10	0.6	0.5	0.7	0.9	1	
Copper	188	161	165	149	120	8	4	3	4	4	
Lead	3	4	4	4	4	ND	0.05	0.05	0.4	0.4	
Nickel	23	18	16	15	16	11	8	7	7	7	
Silver	2	2	2	1	1	0.02	ND	ND	ND	ND	
Zinc	318	286	274	248	221	27	22	20	21	21	
Total Avg	549	486	476	429	372	47	35	32	33	32	
ND	Non-detect					2016-17	Effluent mass based on 101 MGD				
2016-17	Influent mass based on 188 MGD					2017-18	Effluent mass based on 88 MGD				
2017-18	Influent mass based on 185 MGD					2018-19	Effluent mass based on 104 MGD				
2018-19	Influent mass based on 191 MGD					2019-20	Effluent mass based on 101 MGD				
2019-20	Influent mass based on 188 MGD					2020-21	Effluent mass based on 91 MGD				
2020-21	Influent mass based on 182 MGD										

2.7 Mass Emission Benchmarks

OC San's NPDES permit contains mass emission benchmarks for 72 constituents as identified in Section VII. Effluent Mass Emission Benchmarks, Table E-5 on pg. E-31 of Attachment E (Monitoring and Reporting Program). These mass emission benchmarks are not water-quality based effluent limits; however, OC San will use this information as part of its annual evaluation 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 the 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 21.72% of their respective benchmarks with the exception of selenium which was 47.81%. 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. As a result, only four of 72 constituents exceeded 10% of their respective benchmarks. More than half of the 72 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. 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 2020/21
 Orange County Sanitation District, Resource Protection Division

Constituent	2020-21	2020-21	2020-21	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	12-Mo. Avg Benchmark	12-Mo. Avg Actual	Percent of Benchmark						
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
1,1,1-trichloroethane	7.13	0	0	0	0	12	0	94.26	0
1,1,2,2-tetrachloroethane	1.92	0	0	0	0	12	0	94.26	0
1,1,2-trichloroethane	1.92	0	0	0	0	12	0	94.26	0
1,1-dichloroethylene	1.92	0	0	0	0	12	0	94.26	0
1,2-dichloroethane	1.92	0	0	0	0	12	0	94.26	0
1,2-diphenylhydrazine	15.4	0	0	0	0	12	0	95.77	0
1,3-dichloropropene	1.92	0	0	0	0	12	0	94.26	0
1,4-dichlorobenzene	7.68	0	0	0	0	12	0	95.77	0
2,4,6-trichlorophenol	7.68	0	0	0	0	12	0	95.77	0
2,4-dinitrophenol	76.81	0	0	0	0	12	0	95.77	0
2,4-dinitrotoluene	7.68	0	0	0	0	12	0	95.77	0
3,3'-dichlorobenzidine	4.989	0	0	0	0	12	0	95.77	0
4,6-dinitro-2-methylphenol	76.81	0	0	0	0	12	0	95.77	0
Acrolein	24.96	0	0	0	0	12	0	94.26	0
Acrylonitrile	18.06	0	0	0	0	12	0	94.26	0
Aldrin	0.08	0	0	0	0	2	0	89.02	0
Antimony	19.2	0.166	0.86	0.114931	0.215761	12	12	94.98	1.27
Arsenic	1.92	0.417	21.72	0.350734	0.532345	12	12	94.98	3.2
Benzene	3.23	0	0	0	0	12	0	94.26	0
Benzidine	76.81	0	0	0	0	12	0	95.77	0
Beryllium	1.92	0	0	0	0	12	0	94.98	0
Bis(2-chloroethoxy) methane	15.4	0	0	0	0	12	0	95.77	0
Bis(2-chloroethyl) ether	15.4	0	0	0	0	12	0	95.77	0
Bis(2-chloroisopropyl) ether	15.4	0	0	0	0	12	0	95.77	0
Bis(2-ethylhexyl) phthalate	36.67	0	0	0	0	12	0	95.77	0
Cadmium	0.55	0	0	0	0	12	0	94.98	0
Carbon tetrachloride	1.92	0	0	0	0	12	0	94.26	0
Chlordane (Total)	0.76	0	0	0	0	2	0	89.02	0
Chlorobenzene	1.91	0	0	0	0	12	0	94.26	0
Chloroform	2.74	1.177	42.96	0.171399	2.045854	12	12	94.26	9.43
Chromium	2.94	0.165	5.61	0.136009	0.252607	12	12	94.98	1.27
Copper	31.52	0.625	1.98	0.379539	1.25011	12	12	94.98	4.84
Cyanide	7.75	0.516	6.66	0.334601	0.720299	12	12	94.95	4.01
DDT	0.26	0	0	0	0	2	0	89.02	0
Dichlorobenzenes	15.4	0	0	0	0	12	0	95.77	0
Dichloromethane	19.2	0	0	0	0	12	0	94.26	0
Dieldrin	0.08	0	0	0	0	2	0	89.02	0

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2020/21
Orange County Sanitation District, Resource Protection Division

Constituent	2020-21 12-Mo. Avg Benchmark	2020-21 12-Mo. Avg Actual	2020-21 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Diethylphthalate	13.65	0.023	0.17	0	0.270701	12	1	95.77	0.19
Dimethylphthalate	7.68	0	0	0	0	12	0	95.77	0
Di-n-butylphthalate	15.39	0	0	0	0	12	0	95.77	0
Endosulfan	0.23	0	0	0	0	3	0	89.02	0
Endrin	0.04	0	0	0	0	2	0	89.02	0
Ethylbenzene	1.92	0	0	0	0	12	0	94.26	0
Fluoranthene	7.68	0	0	0	0	12	0	95.77	0
Halomethanes	13.44	0.049	0.36	0	0.194904	12	9	94.26	0.39
HCH	0.3	0	0	0	0	2	0	89.02	0
Heptachlor	0.08	0	0	0	0	2	0	89.02	0
Hexachlorobenzene	7.68	0	0	0	0	12	0	95.77	0
Hexachlorobutadiene	15.4	0	0	0	0	12	0	95.77	0
Hexachlorocyclopentadiene	15.4	0	0	0	0	12	0	95.77	0
Hexachloroethane	7.68	0	0	0	0	12	0	95.77	0
Isophorone	7.68	0	0	0	0	12	0	95.77	0
Lead	1.29	0.075	5.81	0	0.133086	12	11	94.98	0.56
Mercury	0.08	0.001	1.25	0.000436	0.000812	12	12	94.98	0
Nickel	10.55	1.114	10.56	0.867798	1.452581	12	12	94.98	8.64
Nitrobenzene	7.68	0	0	0	0	12	0	95.77	0
n-Nitrosodimethylamine	4.61	0	0	0	0	12	0	95.77	0
n-Nitrosodiphenylamine	7.68	0	0	0	0	12	0	95.77	0
PAHs	99.854	0	0	0	0	12	0	95.77	0
PCBs	13.44	0	0	0	0	2	0	89.02	0
Selenium	1.92	0.918	47.81	0.713237	1.283808	12	12	94.98	7.01
Silver	2.67	0	0	0	0	12	0	94.98	0
TCDD equivalents	19.21	0.000022	0	0	0.000088	4	1	91.3	0.000171
Tetrachloroethylene	1.92	0	0	0	0	12	0	94.26	0
Thallium	3.84	0	0	0	0	12	0	94.98	0
Toluene	3.98	0.008	0.2	0	0.060357	12	2	94.26	0.07
Total chlorinated phenols	27.6	0	0	0	0	12	0	95.77	0
Total non-chlorinated phenols	218	0	0	0	0	12	0	95.77	0
Toxaphene	1.92	0	0	0	0	2	0	89.02	0
Trichloroethene	1.92	0	0	0	0	12	0	94.26	0
Vinyl chloride	3.84	0	0	0	0	12	0	94.26	0
Zinc	40.7	3.54	8.7	2.873285	4.203485	12	12	94.98	27.4

^A MT = metric tons

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 the different classifications of permits, how new permittees are identified, and how 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 plating shops, printed circuit board shops, large food processors, textile companies with high volume flows, and industries capable of discharging non-compatible pollutants. A listing of the Class I permittees is given 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, or
2. Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW, 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. Has a reasonable potential for adversely affecting OC San's operation or for violating any Pretreatment Standard, Local Limit, or requirement, or
5. May cause pass through or 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 use fee included on the County of Orange secured property tax bill, 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 Permits

Special purpose permits are issued to dischargers for the purpose of discharging groundwater, surface runoff, 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 is administering the local FOG Program for Food Service Establishments (FSEs) that discharge directly to OC San owned sewer pipelines. Ordinance OCSD-25 provides for the establishment of the FOG 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 emanate 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 2020/21, the pretreatment program managed a total of 550 active permits/certifications. 31 new permits were issued, including 11 Class I permits, four wastehauler permits, and 14 special purpose discharge permits. Forty-two permits were listed as void or expired during the fiscal year (most due to ownership, location, or class changes and subsequent re-issuances), including 18 Class I permits, one discharge certification, 11 special purpose discharge permits, six wastehauler, and six zero discharge certifications. Of the 338 Class I permits (SIUs), 182 were subject to Federal Categorical Pretreatment Standards. Of the 11 special purpose discharge permits that were voided/expired, and the 14 newly issued special purpose discharge permits, six of these were short-term issuances, that is, newly issued and voided or expired during the same reporting period. Similarly, one newly issued Class I permit was issued and voided within the FY 2020/21 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 checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater 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 quarterly data on all new and renewed business licenses. 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 covered 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 either the Federal Categorical Standards or OC San's local discharge limits, whichever are more stringent. 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.

Constituent	Limit (mg/L)	Constituent	Limit (mg/L)
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 domestic 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.

Table 3.2 OC San's Maximum Allowable Discharge Limits for Wastehaulers Discharging Domestic Septage to OC San Wastehauler Stations Orange County Sanitation District, Resource Protection Division	
Constituent	Limit (mg/L)
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 wastehauler 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 three-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 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 permitted flow 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. Because the mass limit (expressed in lb/d) provides a pollutant "ceiling," the user is prevented from introducing large quantities of water in an attempt to dilute concentrations to meet categorical requirements. If a discharger wishes to increase production by expanding capacity or increasing the number of hours worked, pretreatment capabilities must be increased to meet future requirements and ensure long-term compliance with the applicable limits.

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 2020/21.

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 2020/21 (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 2020/21, OC San staff conducted 1,664 inspections and collected 3,515 samples. Compared to last fiscal year, the number of conducted inspections increased this year by 17% however, the number of samples decreased by 8% (Table 4.1).

	Fiscal Years				
	2016-17	2017-18	2018-19	2019-20	2020-21
Inspections*	1,344	1,192	1,362	1,422	1,664
Samples Collected	2,263	3,406	3,235	3,831	3,515

*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 quarterly sampling at 21 Dry-Weather Urban Runoff diversions and inspections at 14 radiator shops.
- 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 2020/21.

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 50 hours assisting the Strike Force in FY 2020/21 by attending meetings and conducting fieldwork in support of Strike Force activities. In FY 2020/21, 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 2020/21 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, 2021, of the active 338 Class I permittees, there were 22 (6.5%) that had been classified as SNC; 13 of these were categorical industries, and 9 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 discharge limits are defined as those in which 66% or more of all measurements taken during a six-month period exceed (by any magnitude) the daily maximum or the average limits for the same pollutant.
- Acute violations of discharge limits are defined as those in which 33% or more of all measurements taken during a six-month period constitute a Technical Review Committee (TRC) violation of the daily maximum or the average limits.
- Any other violation of a pretreatment effluent limit that has caused, either alone or in combination with other discharges, interference or pass through.
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or the environment, or has resulted in OC San's exercise of its emergency authorities.
- Failure to meet within 90 days after the scheduled date of a compliance schedule milestone contained in an enforcement order for starting construction, completing construction, or for attaining final compliance.

- 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 OC San's Ordinance.
- Any other violation or group of violations that will adversely affect the operation or implementation of OC San's pretreatment program.

A summary of the permittees in SNC is presented in Table 4.2. The SNC list was published in the October 21, 2021 issue of the Orange County Register; a copy of the announcement is presented in Appendix E.

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2020/21 Orange County Sanitation District, Resource Protection Division			
Company Name	Permit No	Category	City
<u>Industries SNC Due to Discharge Violations</u>			
Avid Bioservices, Inc.	1-571332	Pharmaceutical	Tustin
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim
<u>Industries SNC Due to Reporting Violations</u>			
9W Halo Western opCo, L.P.	1-600378	OC San Local Limits	Orange
Alex C. Fergusson, LLC, A Zep Company	1-601167	Soap and Detergent Manufacturing	Stanton
Alloy Die Casting Co.	1-531437	Metal Molding and Casting	Buena Park
Alloy Tech Electropolishing, Inc.	1-011036	Metal Finishing	Santa Ana
Coast to Coast Circuits, Inc.	1-111129	Metal Finishing	Huntington Beach
Coastline High Performance Coatings, LTD	1-600812	Metal Finishing	Garden Grove
Cooper and Brain, Inc.	1-031070	OC San Local Limits	Brea
Diamond Environmental Services, LP	1-600244	OC San Local Limits	Fullerton
Dunham Metal Plating Inc.	1-601023	Metal Finishing	Orange
Golden State Pumping LLC	1-600975	OC San Local Limits	Orange
Hi Tech Solder	1-521790	Metal Finishing	Placentia
International Paper Company (Buena Park Bag)	1-531419	OC San Local Limits	Buena Park
National Construction Rentals	1-600652	OC San Local Limits	Santa Ana
Patio and Door Outlet, Inc.	1-521783	Metal Finishing	Orange
Platinum Surface Coating, Inc.	1-521852	Metal Finishing	Anaheim
Quality Aluminum Forge, LLC (Cypress South)	1-600272	Aluminum Forming	Orange
Republic Waste Services	1-521827	OC San Local Limits	Anaheim
Republic Waste Services of So. Cal., LLC	1-021169	OC San Local Limits	Anaheim
Robinson Pharma, Inc. (Harbor North)	1-600126	Pharmaceutical	Santa Ana
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim

4.6 Enforcement Activities

During FY 2020/21, 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 Enforcement Response Plan, OC San has a broad range of enforcement mechanisms available, including but not limited to issuing noncompliance sampling fees, administrative penalties, notices of violation, compliance 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, 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 2020/21 OC San conducted **46 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 2020/21 OC San conducted **19 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 2020/21 OC San issued **87 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 2020/21 OC San issued **11 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 2020/21, OC San issued **115 notices of violations to 80 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 2020/21, noncompliance fees, penalties, settlements, interest, and judgements totaling \$74,439 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 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 2020/21 OC San issued **3 probation orders.**

4.6.7 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 2020/21, OC San **did not issue any enforcement compliance schedule agreements.**

4.6.8 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 2020/21 OC San issued **1 regulatory compliance schedule agreement.**

4.6.9 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 2020/21, OC San **did not issue any administrative penalties in the form of settlement agreements.**

4.6.10 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 2020/21, OC San **did not issue any permit suspensions.**

4.6.11 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 2020/21 OC San **did not issue any permit revocations.**

4.6.12 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 2020/21, OC San **did not issue any emergency suspension orders.**

4.6.13 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 2020/21, OC San **did not file any civil or criminal complaints.**

4.7 Enforcement Summary

This section summarizes various enforcement actions conducted for in FY 2020/21 reporting year. Potential enforcement actions include but are not limited to compliance inspections, compliance meetings, probation orders, enforcement compliance schedule agreements, regulation compliance schedule agreements, orders to cease, permit suspensions, and permit revocations.

Accurate Circuit Engineering (Permit No. 1-011138)

Accurate Circuit Engineering (ACE) is a bare printed circuit board (PCB) manufacturer with an in-house design and engineering team, as well as large scale manufacturing operations. ACE manufactures various types of PCBs, including rigid single sided, rigid double-sided, and rigid multilayer. Parts are owned by the company at the time of manufacturing, and then invoiced to the customer after production. Although each job lot is designed to meet the customer's specifications, the facility does own the parts during processing. Manufacturing begins with the cutting of copper clad materials, application of photoresist, inner-layer photo imaging, resist developing, cupric chloride etching, and alkaline resist etching. Next, parts are surface prepped with Co-bra bond, laminated, and drilled. Drilled holes are besmeared with permanganate and

made conductable through electroless copper plating. Outer layer circuit development is conducted by panel plate process steps, including copper plating, photo imaging, resist developing, and cupric etching.

ACE employs anion and cation ion exchange and hydroxide chemical precipitation to treat wastestreams generated at the facility. Ion exchange regenerant is collected and batch treated, and solids are processed through a filter press.

January 1 – June 30, 2021

On January 28, 2021, during a routine inspection at ACE, OC San observed water softener regenerate and reverse osmosis reject streams running continuously to the compliance sampling location and sewer. Discharge of this type of wastewater to the sewer via the sample point is a violation of the federal prohibition on dilution and OC San's prohibition on dilution. OC San also observed that certain wastestreams including those from the developer, resist strip rinses, and Hyoki scrubber were not being treated prior to discharge.

On March 10, 2021, OC San issued a compliance requirements letter requiring ACE to: (1) complete a wastewater characterization of the developer, resist strip rinses, and Hyoki scrubber process wastestreams, (2) submit a proposal to implement pretreatment for these streams, and (3) cease discharge of dilution wastewater to the sample point and hard-plumb/reroute the water softener regenerate and RO reject wastestreams to downstream of the compliance sampling point. On April 30, 2021, ACE submitted the wastewater characterization. On May 10, 2021, OC San issued an order to cease noncompliance to ACE for reporting violations. On May 31, 2021, ACE rerouted the water softener regenerate and RO reject streams to downstream of the compliance sampling point, submitted updated facility plot plans and drawings, and submitted a proposal for waste handling and treatment for the developer, resist strip rinses, and Hyoki scrubber wastestreams. Wastestreams from resist strip are being batch treated and the Hyoki scrubber is being sent to the ion exchange system.

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

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 12, 2021, OC San issued a compliance requirement letter requiring Active Plating to retain a certified industrial wastewater treatment operator during every operating shift and submit to OC San a copy of the operator's qualifications and certification immediately. In previous communications, Active Plating failed to provide a copy of the operator's qualification and certification. On March 16, 2021, OC San issued a compliance requirement letter directing Active Plating to attend a compliance meeting on April 8, 2021, to discuss the operator's qualifications and certification and provide an explanation for this noncompliance with OC San's requirements. Active Plating stated that CWEA is no longer offering the Wastewater Treatment Operator Certification in California and it would search for another alternative. To date, OC San has not received a copy of the operator's qualifications and certification, despite OC San's multiple attempts to obtain this information from Active Plating.

Active Plating had no further violations during this reporting period. OC San will continue to monitor Active Plating'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 a clear anoseal followed by final rinsing and drying. Most of the wastewater is generated from the rinsing operations. ATP operates a continuous and a batch pretreatment system which consists of chrome reduction, pH adjustment, flocculation, metal precipitation and clarification. ATP utilizes a filter press for sludge dewatering.

In May 2019, ATP had pH violations, as well as major zinc, copper, and nickel daily and monthly average discharge limit violations. OC San issued ATP an order to cease noncompliant discharges due to the severity of the violations. OC San also conducted a compliance inspection during which ATP was directed to stop noncompliant discharges and determine the cause of the violations. ATP submitted a response letter indicating that a clogged discharge tube on the sodium hydroxide metering pump led to a low pH and, hence, incomplete treatment of metals. ATP's corrective actions included installation of a low pH alarm and a recirculation line, which would allow ATP to recirculate noncompliant wastewater back into the treatment tanks. In June 2019, OC San issued a compliance requirement letter directing ATP to attend a compliance meeting to discuss the violations. During the compliance meeting requirement, ATP was directed to take the following additional corrective measures: automating the low pH recirculation line with, employing a qualified operator present during all discharge hours, maintaining the pretreatment tanks, good housekeeping, and performing a hydraulic evaluation of the pretreatment system.

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

January 1 – June 30, 2021

On January 14, 2021, ATP had nickel and zinc violations for which an NOV was issued on January 26, 2021. On February 25, 2021, OC San conducted a compliance inspection. During the inspection, ATP reported the waste treatment operator had passed away before the facility had confirmed the source for the non-compliant discharge. However, due to sludge accumulation at the designated sample point, the facility

suspected improper management of accumulated solids within the pretreatment system had caused the violations. As corrective actions, the facility had cleaned all solids from the pretreatment system and contracted a certified waste treatment operator to manage the pretreatment system until the facility could hire a permanent employee as a certified wastewater treatment operator. The facility also modified its wastewater treatment schedule to comply with permit and Ordinance conditions that require the facility to maintain a qualified wastewater treatment operator at all times at which wastewater is processed. On March 17, 2021, OC San completed a resample for heavy metals and the results indicated compliance. On April 1, 2021, OC San issued an NOV for chromium, nickel, and zinc monthly average discharge limit violations for January 2021. OC San conducted a compliance inspection on April 13, 2021. In the permit renewal, OC San added conditions that required ATP to submit updated documents for the following by June 30, 2021: pretreatment system layout and process flow drawings, manufacturing process drawings, an operation and maintenance manual, a slug discharge control plan, and a wastewater characterization report for all wastewater sources at the facility.

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

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

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

In June 2019, Alliance had a pH violation. In August 2019, OC San conducted a compliance inspection during which Alliance indicated that the source of the violation is the clean in place (CIP) process. The current process at Alliance uses a Jensen CIP system, which operates on a selector switch scheme. Alliance determined that an operator selected the wrong position on the drain switch and incorrectly diverted low pH rinse water to the drain. Alliance submitted a corrective action letter, which included implementation of a new batch process where all CIP wastewaters will be discharged to a waste drum and tested for pH and will be discharged to the drain only if the wastewater is within an allowable pH range. During the investigation of the probable source of the pH violation, OC San instructed Alliance to prepare a plumbing plan of the facility to determine all the wastewater discharge points. As a result of this study, it was determined that Alliance's sample point is not representative of the discharge at the facility. OC San continued to conduct multiple inspections and meetings with Alliance to refine the plumbing study and correct any missing items on the plumbing plan to determine an appropriate path forward. In June 2020, OC San issued a compliance requirement letter directing Alliance to eliminate any bypasses and install the proposed solution by the next reporting period.

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On February 3, 2021, Alliance notified OC San that City of Irvine had approved the site plan on February 2, 2021. The construction project began on-site on February 8, 2021, and OC San was notified of the same on February 11, 2021. On March 24, 2021, Alliance notified OC San that the project was scheduled for

completion by the end of May 2021. In subsequent notifications and inspections, Alliance noted that most of the new piping has been laid out and only the backfilling and concrete pour back was remaining, which requires another City of Irvine approval and is expected to be completed in the next reporting period.

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

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On January 14, 2021, OC San issued an NOV for the October 2020 zinc monthly exceedance.

OC San reviewed Alloy Die's production data as it pertains to the permitted mass allocations; however the data provided did not substantially modify the zinc permit limits. OC San will again review the mass allocations and production data during the permit renewal process. Alloy Die noted that additional in-situ tests were implemented to provide additional confirmations of zinc concentrations in the batch tank prior to discharge.

OC San will also continue to monitor Alloy Die'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.

January 1 – June 30, 2021

On March 16, 2021, Alsco performed voluntary self-monitoring which yielded an oil & grease of petroleum or mineral origin violation. Alsco reported the violation to OC San on May 14, 2021, for which an NOV was

issued on May 20, 2021. AlSCO submitted a corrective action report to OC San on June 28, 2021. As described by the corrective action report, AlSCO conducted an internal study to review the consistency of analytical results returned by its designated testing laboratory. AlSCO collected split samples from various points of production and submitted the samples to separate testing laboratories. Based on the results, AlSCO attributed the violation to laboratory error and insufficient application of silica gel which may have caused interference between polar and non-polar constituents.

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On January 7, 2021, OC San issued an NOV for Aluminum Precision's October 2020 oil & grease monthly limit exceedance. Aluminum Precision was informed of the need to target monthly average limits versus daily discharge limits to ensure long-term compliance.

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

Anaheim Extrusion Co., Inc. (Permit No. 1-021168)

Anaheim Extrusion Co., Inc. (Anaheim Extrusion) provides aluminum extruded shapes for a broad base of products that include window frames, carpet and flooring thresholds and moldings, and patio frames. Anaheim Extrusion shears aluminum logs into shorter billets which are processed in one of two hydraulic extrusion presses. Once processed, aluminum pieces are either quenched rapidly in soft water or cooled in ambient air.

Wastewater is generated from extrusion die wash water and contact cooling water (quench water). The dies are soaked in a caustic bath, heated to remove residual aluminum from the surface, then rinsed in a static rinse tank. Spent die wash water is treated for metals precipitation and pH then discharged through a filter press and two cartridge filters then to a holding tank. The tank discharges to the sample box. Quench water is recycled through a cooling tower or reused to prepare new batches of caustic wash water for die cleaning.

January 1 – June 30, 2021

On January 22, 2021, Anaheim Extrusion had a pH violation for which an NOV was issued on February 11, 2021. On March 5, 2021, Anaheim Extrusion submitted a corrective action report that attributed the violation to a malfunction in the pretreatment system's sulfuric acid dosing pump. Anaheim Extrusion replaced the pump. On March 9, 2021, OC San completed a resample for pH and the results showed compliance. On May 6, 2021, OC San conducted a compliance inspection. During the inspection, Anaheim Extrusion confirmed pH monitoring, calibration and buffer solutions were maintained and documented.

Anaheim Extrusion had no further violations during this reporting period. OC San will continue to monitor Anaheim Extrusion's discharge and compliance status.

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

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

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On March 20, 2021, Anchen submitted a site closure notification to OC San effective April 10, 2021. On April 22, 2021, OC San conducted a site-closure inspection, and the permit was voided on the same day.

Andres Technical Plating (Permit No. 1-521798)

Andres Technical Plating (Andres) is a job shop and performs soap cleaning, alkaline cleaning, acid cleaning, and electroplating of nickel, copper, chromium bathroom fixtures and small automobile parts.

The pretreatment area is divided into treatment for two segregated wastestreams, zinc and nickel bearing wastewater and copper and chrome bearing wastewater. Batch treatment is conducted on both streams 2-3 times a week or as needed. Both waste streams flow into a pair of separate batch tanks for treatment. Nickel and zinc wastewater undergoes typical metals hydroxide precipitation, while copper and chrome undergo chrome reduction with ORP and sodium metabisulfite. Following chrome reduction, this wastewater is diverted to nickel zinc treatment for complete metals treatment. Solids are pumped to the sludge holding tank and then to the filter press and supernatant clear water is pumped to WW Tank 6 for holding prior to discharge.

January 1 – June 30, 2021

On April 15, 2021, Andres had a nickel violation for which an NOV was issued June 3, 2021. Andres will also be issued an additional NOV during the next reporting period for the April nickel monthly violation. On May 10, 2021, OC San issued an order to cease noncompliance to Andres for reporting violations.

As a result of the violation, OC San conducted a compliance inspection at Andres on June 17, 2021. During the compliance inspection, multiple compliance deficiencies were identified by OC San including the use of flexible hosing, manual addition of chemicals to the batch treatment system, wastewater pipes that are not identified, lack of a certified wastewater treatment operator at all times during wastewater discharge, the discharge of noncompliant wastewater, lack of instrumentation calibration at appropriate frequencies, and outdated wastewater characterization.

OC San staff will follow-up on the compliance requirements during the next reporting period and continue to monitor Andres' discharge and compliance status on a quarterly basis.

APCT Anaheim (Permit No. 1-600689)

APCT Anaheim (APCT Anaheim) is a manufacturer of electronic circuit boards for various industries. Wastewater is generated from the cleaning, circuit image developing, ammonia etching, resist stripping, oxide coating, copper plating, tin plating, copper etching, and soldermasking processes and associated rinses. APCT Anaheim's pretreatment system consists of a batch treatment system, a continuous treatment system, and a batch treatment system for resist stripper waste (currently not in use). Treated wastewater flows to a pH adjustment tank which is equipped with automatic pH control and discharges to a final, below-ground, three-stage clarifier.

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

July 1 – December 31, 2020

On July 2, 2020, OC San issued an NOV for the June 2020 copper daily limit exceedance. APCT Anaheim responded with corrective actions, which included clarifier clean-out and the implementation of batch treatment logs that included copper sampling results. On July 15, 2020, OC San conducted a compliance inspection which revealed that existing flow rates were overloading the hydraulic capacity of the batch

treatment system and impacting APCT Anaheim's ability to maintain compliance. On August 10, 2020, OC San issued a probation order to address APCT Anaheim's pretreatment deficiencies. On September 3, 2020, OC San issued an NOV for the June 2020 copper monthly limit exceedance. On October 6, 2020, OC San issued a compliance requirement letter requiring APCT Anaheim to attend a compliance meeting, which was held on October 13, 2020. On October 19, 2020, OC San issued a compliance requirement letter with new completion dates for the probation order. APCT Anaheim submitted a waste management proposal, which included the start-up of an out-of-service continuous treatment system to remove some of the wastewater load from the batch treatment system. On November 17, 2020, OC San accepted the proposal, after which APCT Anaheim proceeded with the continuous treatment system start-up and completion of outstanding probation order requirements.

January 1 – June 30, 2021

APTC Anaheim had no violations during this reporting period and completed start-up of the continuous treatment system. OC San will continue to monitor APTC Anaheim's discharge and compliance status on 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, phototresist developing, ammonium etching, alkaline resist stripping, and automatic optical inspection (AOI). This is followed by surface preparation, lamination, and drilling. Outer-layer circuit development proceeds by either panel-plate or pattern-plate process steps. Panel-plate boards undergo copper plating followed by photoresist application, circuit imaging, photoresist developing, and ammonium etching. Pattern-plate boards undergo photoresist application, circuit imaging, resist developing, and copper plating. The pattern-plate boards are then sent offsite for tin/lead plating and brought back onsite for ammonium etching and tin resist stripping. After resist stripping, the boards undergo a second AOI inspection, followed by solder mask application. The boards are again sent offsite for final surface finishing such as hot air solder leveling and/or nickel/gold plating. Upon return, the boards receive legend screening, a final visual inspection, routing, and electrical testing. APCT OC employs ion exchange, batch treatment and pH adjustment to treat all wastewater generated prior to discharge to the sewer.

July 1 – December 31, 2020

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

On December 17, 2020, OC San commented on the corrective action report and requested further clarification. On December 18, 2020, APCT OC responded with a report stating that a faulty pH meter in the automatic pH adjustment system within the final effluent tank had also contributed to the copper violation.

January 1 – June 30, 2021

On February 2, 2021, OC San conducted a compliance inspection at APCT OC to investigate the root cause of the copper violation detected in APCT's wastewater discharge on November 6, 2020, to follow-up on the corrective action report submitted on December 18, 2020, and to discuss several manufacturing and pretreatment process modifications around the facility. During this inspection, APCT reported that the company has since replaced the pH probe and installed a new mechanical mixer. OC San issued an NOV on February 18, 2021, for the copper monthly violation from November 2020.

On March 10, 2021, OC San issued a compliance requirement letter requiring APCT to: (1) institute daily checks of the pH probes (maintenance and calibration), (2) Institute pH probe and pH meter maintenance

(scheduled, preventative, and corrective) and calibration procedures, (3) retain maintenance and calibration records of the pH probes, and (4) submit updated facility plot plans and drawings, including a piping layout, for any proposed changes at the facility.

APCT OC reported that all pH meters are maintained and calibrated twice a month and submitted updated facility drawings in March 2021. OC San will continue to monitor APCT OC's discharge and compliance status on a quarterly basis.

ARO Service (Permit No. 1-021192)

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

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

Arrowhead Products Corporation (Permit No. 1-031137)

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

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

July 1 – December 31, 2020

OC San conducted multiple inspections during this reporting period including a compliance inspection on November 10, 2020, to address compliance deficiencies including wastestreams that bypass treatment and/or the compliance sample point, the lack of adequate treatment and flow measurement for several wastestreams, and the newly established effluent discharge limits issued in the recent permit renewal based on information collected during the inspections.

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

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

January 1 – June 30, 2021

On March 25, 2021, OC San and Arrowhead entered into a RCSA with a completion date of November 30, 2021. In this agreement, Arrowhead was required to immediately take and implement any and all steps and measures including, but not be limited to, a pretreatment capacity analysis, and the proposal and installation of additional pretreatment equipment/technology and/or the implementation of best management practices, waste minimization measures, and process modifications necessary to attain immediate and long-term compliance with all discharge limits and conditions set forth in Permit No. 1-031137.

Arrowhead was previously categorized under the federal Metal Finishing category (40 CFR Section 433), and has been recategorized under the Iron and Steel Manufacturing category (40 CFR Section 420) and the Nonferrous Metals Forming and Metal Powders category (40 CFR Section 471) effective January 1, 2021.

Arrowhead has submitted and OC San has accepted bi-weekly progress reports, the interim compliance proposal, the industrial wastewater survey, the evaluation of the existing pretreatment system, and proposals for hard plumbing and adequate treatment of all wastewater streams prior to discharge to the compliance sampling point. OC San will follow-up during the next reporting period on the remaining RCSA items and continue to monitor Arrowhead's discharge and compliance status on a quarterly basis.

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

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

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

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

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

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

July 1 – December 31, 2020

In December 2020, OC San drafted a stipulation for judgment and injunction through a California State Superior Court and planned to enter into an agreement with Aseptic for the payment of past due amounts and issuance of a permit. OC San will continue this enforcement action in the next reporting period.

January 1 – June 30, 2021

On March 24, 2021, Aseptic had a pH violation for which an NOV was issued on April 1, 2021. As a result of inadequate process control, Aseptic was directed to enhance the pH adjustment system to ensure long-term compliance. OC San will continue to monitor Aseptic's discharge and compliance status on a quarterly basis.

Aseptic Technology, LLC (Landon) (Permit No. 1-600716)

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

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

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

January 1 – June 30, 2021

On January 27, 2021, OC San issued a compliance requirement letter, requiring Aseptic to cease discharge without a valid permit. As a result of nonpayment of outstanding fees, and per OC San's Ordinance and OC San Board Resolution No. OCSD 11-04, OC San is authorized to withhold the issuance of a permit to any person or entity who has demonstrated an inability to submit timely payment to OC San, or who has an outstanding debt obligation with OC San. Therefore, Aseptic was expected to cease all industrial wastewater discharge to OC San's sewerage facilities after the expiration of Permit No. 1-600716 which occurred on January 31, 2021.

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 28, 2021, OC San issued an NOV for the December 2020 acetone noncompliance. On January 19, 2021, Avid submitted a corrective action report attributing the violation to the AKTA Flowkit Installation Operation on-site which utilizes a one-percent acetone solution for validation of the equipment. Avid stated that this acetone waste was inadvertently drained into the wastewater system instead of being waste-hauled. Avid addressed the noncompliance issue by revising their standard operating procedure for the AKTA process and conducted additional trainings with the manufacturing team. In the month of February 2021, Avid had another monthly discharge violation for acetone during their resample event for the first violation. Avid attributed the source of this monthly acetone violation to residue in the discharge system and addressed the violation by cleaning out the discharge system including the final holding tank. Avid volunteered to take additional acetone samples in the month of March which resulted in a third acetone violation on March 16, 2021. This acetone daily limit exceedance also resulted in an acetone monthly average discharge limit violation. On March 18, 2021, OC San issued an NOV for the December 2020 acetone monthly limit violation.

On April 14, 2021, OC San met Avid representatives to discuss the recent acetone violations and to conduct a compliance inspection of the facility. During the inspection, Avid provided an updated corrective action report due to the chronic nature of the acetone violations citing the source of the various acetone violations and the measures that Avid has put into place. To prevent further noncompliance, Avid's facility changes included further modification of the standard operating procedures and color coding the waste bags and training before every event that utilizes acetone. Additionally, Avid committed to removing acetone from the existing processes. On April 15, 2021, OC San issued an NOV to Avid for the March 2021 acetone daily limit violation. OC San revised Avid's permit to increase self-monitoring frequency for acetone effective May 1, 2021. On May 6, 2021, OC San issued an NOV for the February 2021 acetone monthly limit violation. At OC San's direction, Avid conducted multi-day self-monitoring in May 2021 which showed compliance. On June 10, 2021, OC San issued an NOV for the March 2021 acetone monthly limit violation.

Avid informed OC San that a full conversion to a non-acetone-based process will be completed in the next reporting period. OC San will continue to monitor Avid's progress and compliance status during the next reporting period.

Bazz Houston Co. (Permit No. 1-031010)

Bazz Houston Co. (Bazz) manufactures springs, stampings and various metal parts through machining and bending operations. Wastewater is primarily generated by deburring operations and is discharged into a partitioned tank via hosing and gravity flows as runoff over a concrete pad into a sump.

January 1 – June 30, 2021

On January 5, 2021, Bazz had an oil & grease violation, for which an NOV was issued on February 4, 2021. Resampling on March 3, 2021, demonstrated compliance. On March 30, 2021, a compliance inspection was conducted during which Bazz provided a corrective action report that attributed the violation to incorrect

sampling technique utilized by their contracted laboratory technician. Bazz also stated that they had collected additional re-samples that also exceeded their permit limits but claimed that these samples were not representative of their discharge. During the inspection, OC San observed that the discharge was not hard-plumbed to the discharge point, where wastewater flows as runoff over a concrete pad into the sump. On May 12, 2021, OC San issued a compliance requirement letter requiring Bazz to hard-plumb and reroute their piping configuration, install an accessible sample box lid, establish a maintenance schedule for their sump and provide a detailed explanation as to why their re-sample is not representative of their discharge. On June 16, Bazz submitted the proposal and it is currently pending OC San review.

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

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

Beo-Mag Plating is small job shop specializing in decorative chrome and gold plating, restoration of motorcycle and classic automobile parts, bathroom fixtures and other assorted parts.

The processing of a steel or die-cast zinc part generally proceeds by polishing, electrocleaning, cyanide copper strike, acid copper plating, manual buffing, alkaline cleaning to remove the buffing residue, nickel plating, and finally chrome plating. The chrome plating of a typical aluminum part proceeds by polishing, alkaline cleaning, Alumina acid etch, deoxidation, zincate, copper plating, buffing, alkaline cleaning to remove the buffing residue, nickel plating, and finally chrome plating. All wet operations are conducted manually using typical rack and wire plating techniques.

Wastestreams generated at Beo-Mag plating are treated using hydroxide precipitation, chrome reduction and cyanide destruction.

January 1 – June 30, 2021

On March 31 and April 30, 2021, Beo-Mag had cyanide monthly average violations, for which an NOV was issued on June 3, 2021 and an NOV will be issued during the next reporting period, respectively. On June 15, 2021, OC San conducted a compliance inspection to investigate the cause of the total cyanide violation detected in the facility's discharge during OC San's sampling event on March 25, 2021. Beo-Mag attributed the cyanide violation to operator error and discharging untreated wastewater.

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

Bimbo Bakeries U.S.A, Inc. (Permit No. 1-521838)

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 6, 2021, Bimbo had a pH violation for which an NOV was issued on January 28, 2021. On February 28, 2021, Bimbo submitted a corrective action report to OC San and attributed the pH violation to lack of pH monitoring by staff and inadequate pH probe maintenance. In the corrective action report, Bimbo documented an increased frequency of pH maintenance and calibration and identified the need for operator training.

OC San will follow up on additional enforcement actions and continue to monitor Bimbo's discharge and compliance status on a quarterly basis.

Brindle/Thomas – Catalina & Copeland (Permit No. 1-531430)

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

July 1 – December 31, 2020

On December 8, 2020, Brindle had an oil & grease violation, for which an NOV will be issued in the next reporting period. In addition, during a routine inspection, OC San staff observed that the facility's clarifier are open to stormwater which is then discharged to the sewer. Since this practice is not in compliance with OC San's prohibition on the discharge of stormwater to the sewer, OC San will issue a compliance requirement letter during the next reporting period.

January 1 – June 30, 2021

On March 4, 2021, OC San issued an NOV for the December 2020 oil and grease violation. Brindle stated that the violation in December 2020 occurred because of inadequate clarifier maintenance and had since waste-hauled any accumulated solids in the clarifier as a corrective action. In response to the violation, OC San revised Permit No. 1-531430 to include a special condition requiring routine maintenance of the clarifier on a quarterly basis or more frequently as necessary.

On March 2, 2021, OC San issued a compliance requirement letter requiring Brindle to submit a proposal to cease the discharge of stormwater to the sewer to OC San by March 31, 2021, and complete implementation of the accepted proposal by April 30, 2021. On March 10, 2021, Brindle submitted a proposal to mitigate the stormwater issue and OC San accepted the proposal on March 18, 2021. Brindle complete installation of a roof covering the clarifier on March 22, 2021.

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

Bristol Industries (Permit No. 1-021226)

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

Throughout 2017, 2018, 2019 and first half of 2020, Bristol discharged industrial wastewaters which were chronically non-compliant with the cyanide (amenable and total), cadmium, nickel, silver, and pH effluent discharge limits. OC San had issued numerous NOV's, compliance requirement letters and orders, conducted multiple compliance inspections, and held multiple compliance meetings with Bristol. Bristol completed several corrective actions to resolve the root cause behind the violations; however, systemic operational issues and inadequate pretreatment equipment prevented Bristol from achieving consistent compliance. In 2019, Bristol was issued a settlement agreement, followed by an ecsa which directed the facility to implement significant modifications to the facility and its operations through 2019 and 2020,

including a revised pretreatment system, in order to achieve long-term compliance with permit and Ordinance terms and conditions.

July 1 – December 31, 2020

On July 14, 2020, OC San conducted a compliance inspection to verify the installation of the new pretreatment system at Bristol. The pretreatment system, with the exception of the Silver Ion-net system proposed by Bristol, was completed and appeared to be maintained properly. The Silver Ion-net system was confirmed to be installed on July 31, 2020. At OC San's direction, Bristol conducted multi-day self-checks for the pretreatment system to ensure the system was working within the operating parameters. Bristol's permit was also revised to account for the recent changes in equipment and effluent flow at the facility.

Bristol had no further violations during this reporting period.

January 1 – June 30, 2021

Bristol had no violations during this reporting period. OC San will continue to monitor Bristol'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.

January 1 – June 30, 2021

During a routine inspection on February 24, 2021, OC San was informed that Cargill was still discharging their 'first flush' of stormwater into the sewer system. On April 27, 2021, a compliance requirement letter was issued which required Cargill to attend a compliance meeting. On May 12, 2021, a compliance inspection was conducted. During this inspection, Cargill explained that no stormwater is being discharged to the sewer as they pump out all process wastewater from exposed sumps and flushed the trench drains prior to a rain event, thus completely segregating their stormwater from their process wastewater. Following the explanation provided during this inspection, the compliance meeting was canceled, and OC San requested Cargill to provide detailed documentation of the procedures that Cargill had put in place to mitigate their stormwater discharge. On May 31, 2021, Cargill submitted their response to OC San's request. However, in their response, Cargill confirmed that their 'first flush' is being discharged into the sewer. OC San plans on issuing a compliance requirement letter in the next period to address this issue.

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

Catalina Cylinders, a Div. of APP (Permit No. 1-031021)

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

In January 2019 Catalina Cylinders had an oil & grease of mineral or petroleum origin mass violation, for which an NOV was issued in March 2019. In March 2019, OC San conducted a compliance inspection during which OC San explained to Catalina Cylinders that based on the manufacturing operations

conducted onsite, the company's wastewater discharge is subject to the Aluminum Forming federal categorical pretreatment standards and, as a result, the oil & grease mass limits are production-based. OC San explained further that to comply with the stringent production-based mass limits, the oil & grease concentration must be kept below approximately 15 mg/L during an average day's flow, which would likely require pretreatment beyond the clarifier they presently operate.

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 19, 2021, OC San issued a compliance requirement letter requiring Catalina Cylinders to attend a compliance meeting on February 2, 2021, during which Catalina Cylinders reported that they were unable to determine the source of the violation. However, Catalina had increased their clarifier maintenance to a quarterly basis and had added maintenance of their clarifier to their facility preventative maintenance schedule. Catalina plans to monitor and maintain the clarifier and the sump skimmer system moving forward. No other violation occurred during this period.

OC San will continue to monitor Catalina Cylinders' discharge and 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.

January 1 – June 30, 2021

On May 10, 2021, OC San issued order to cease noncompliance to Chromadora for reporting violations.

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

City of Newport Beach, General Services

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

During an inspection in February 2017, OC San discovered that several areas within the yard which receive stormwater flow had a direct connection to an OC San sewer trunkline. The discharge of stormwater to the sewer is prohibited by OC San's Ordinance No. OCSD-53. Therefore, OC San issued a compliance requirement letter directing the City of Newport Beach to divert stormwater away from OC San's sewerage facilities. Following a series of correspondence and inspections, the City of Newport Beach plugged and rerouted several areas to prevent stormwater from entering the sewer system. Additionally, the City of Newport Beach installed a rainwater diversion valve to divert stormwater from the upper areas, and a Fresno Sluice Gate in the sewer/stormwater decanting area, which remains closed during the winter wet-season months.

July 1 – December 31, 2020

OC San was unable to perform an inspection of the second clarifier as there was no substantial rain event during which OC San staff could visit the facility during this reporting period.

OC San will perform an inspection of the second clarifier and the rain diversion valve and switch during the next reporting period (during a rain event) to evaluate the effectiveness of the solution.

January 1 – June 30, 2021

On March 3 and 11, 2021, OC San conducted inspections during storms event and observed that the rain diversion valve installed onsite did not appear to be activated, allowing sheet flow to enter the storm grate, which flows to OC San's sewer. In addition, the sluice gate installed on the stormwater operations side of the decanting area was left open, allowing stormwater to flow to the sewer.

On March 25, 2021, OC San issued a compliance requirement letter. This letter summarized the findings of the March 3 and 11, 2021 inspections, and directed the City of Newport Beach to attend a compliance meeting on April 19, 2021.

During the compliance meeting, Newport Beach representatives noted that during rain events, resources were impacted and the sluice gate became a low priority item to verify. As a corrective action the gates will remain closed at all times and only opened when ready to discharge. Signs have been posted in the employee break room and by the decanting area and employees have been retrained, requiring that employees keep the sluice gate closed at all times. Newport representatives will also address the "dry time" of the rain diversion valve to ensure it remains closed following rain events.

A compliance requirement letter dated May 27, 2021, was issued to the City of Newport Beach summarizing the compliance meeting and stating the corrective actions that have taken place. In addition, an updated facility map and plumbing diagram was requested.

OC San will review the plans and perform an inspection of the facility during the next reporting period (during a rain event) to ensure sluice gates are closed and the rain diversion valve is activated.

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

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

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

July 1 – December 31, 2020

On August 17, 2020, OC San issued an NOV for the June 2020 oil & grease violation of daily and instantaneous discharge limits. The City of Newport Beach reported that they had not discharged any wastewater to the sewer for approximately one year as the wastewater was being re-injected back into the

aquifer. However, discharge to the sewer was resumed in June 2020 as the re-injection pump needed repairs. The City of Newport Beach noted that since that was the first discharge to the sewer after a year, the tanks and piping used to transport wastewater may have contained excess oil & grease buildup. As a corrective action, the City of Newport Beach performed routine maintenance on the pretreatment system and associated equipment as the re-injection pump will most likely be offline for the foreseeable future. Resampling on July 2, 2020 demonstrated compliance.

The City of Newport Beach had no further violations during this reporting period.

January 1 – June 30, 2021

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

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

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

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

July 1 – December 31, 2020

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

Tustin Maintenance Yard had no further violations during this reporting period.

January 1 – June 30, 2021

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

CJ Foods Manufacturing Corp. (Permit No. 1-521849)

CJ Foods Manufacturing Corp. (CJ Foods) manufactures, packages, and distributes dumplings. Wastewater is generated by the cleaning and sterilization of processing and packaging equipment along with some other miscellaneous washdown. Pretreatment consists of pH adjustment with sodium hydroxide in a 5,000-gallon underground clarifier.

January 1 – July 31, 2021

On June 3, 2021, CJ Foods had a pH violation, for which an NOV was issued on June 17, 2021. On June 17, 2021, CJ Foods submitted the results of their investigation including a corrective action report, in which CJ Foods attributed the pH violations to siphoning of sodium hydroxide into the clarifier, which led to excessive dosing in the clarifier. As a corrective action, CJ Foods installed a solenoid valve downstream of the chemical feed pump that is controlled by the pH controller to prevent siphoning from occurring.

OC San staff will continue enforcement during the next reporting period and continue to monitor CJ Foods' discharge and compliance status during the next reporting period.

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

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

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

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

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

July 1 – December 31, 2020

On August 13, 2020, Coast had copper daily limit and mass violations, for which an NOV was issued on September 10, 2020. The daily limit exceedance also resulted in a copper monthly average discharge limit violation. On October 14, 2020, OC San issued a compliance requirement letter requiring Coast to attend a compliance meeting to discuss the violations and Coast's probation order compliance status. On October 29, 2020, OC San held a compliance meeting with Coast after Coast submitted a proposal that failed to meet the probation order requirements. On November 4, 2020, OC San issued a compliance requirement letter with new compliance schedule dates for the probation order requirements. On November 5, 2020, OC San issued an NOV for the August 2020 monthly limit exceedance. On December 18, 2020, after further discussion with Coast, OC San accepted Coast's proposal to install a new automatic batch treatment system, a new pH adjustment tank and clarifier, and a pH chart recorder with automatic pH noncompliance diversion valve.

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

January 1 – June 30, 2021

On January 25, 2021, OC San issued a compliance requirement letter requiring Coast to attend a compliance meeting on February 1, 2021. During the compliance meeting, OC San discussed Coast's

failure to address probation order requirements and to comply with the compliance schedule established in the probation order. On January 28, 2021, during a compliance inspection, OC San noted multiple pretreatment deficiencies including pH alarms that were deactivated and changes to the batch treatment system that were not in accordance with the accepted proposal. On March 1, 2021, OC San issued a compliance requirement letter requiring Coast to submit a revised waste management plan by March 15, 2021, complete implementation of the automatic batch treatment system, pH diversion valve, and clarifier by March 31, 2021, provide an explanation for the discrepancy in wastewater flow rates by March 31, 2021, install an effluent flow meter by May 31, 2021, and perform a hydraulic calibration by May 31, 2021. On April 1, 2021, OC San conducted a compliance inspection during which multiple deficiencies were found including changes to the treatment system without notification of OC San, the unexplained use of a city water line just downstream of the sample point, the discharge of non-regulated wastewater to the sample point, and the discharge of concentrated floor waste without appropriate treatment. As a result, OC San issued a compliance requirement letter on April 14, 2021, requiring Coast to attend a compliance meeting to discuss the deficiencies noted during the inspection on April 1, 2021. On March 25, 2021, Coast had a copper violation for which an NOV was issued on April 15, 2021. During the compliance meeting on April 29, 2021, OC San noted the compliance issues found during the inspection on April 1, 2021, and warned Coast that continued discharge untreated floor waste to the sewer would result in requiring Coast to treat all waste in a batch mode and prohibiting the use of a continuous treatment system. On May 19, 2021, OC San issued a compliance requirement letter requiring Coast to: (1) complete any outstanding probation order requirements including submitting a revised O&M manual and updated as-built manufacturing process layout drawings by May 31, 2021, (2) complete installation of the new clarifier and submit as-built drawings to OC San by May 31, 2021, and (3) sever the connection of the city water line to the wastewater discharge pipe and relocate any non-regulated wastewater sources to prevent comingling with regulated wastewater at the sample point by May 31, 2021. OC San issued an NOV on June 3, 2021 for the copper monthly violation from March 2021.

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

Columbine Associates (Permit No. 1-521784)

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

July 1 – December 31, 2020

During routine inspection and sampling events on July 17 and July 28, 2020, OC San observed a thick layer of crude oil that has accumulated in Columbine's two-stage clarifier. On August 6, 2020, Columbine had an oil & grease violation, for which an NOV was issued on August 27, 2020. On October 15, 2020, OC San issued a compliance requirement letter. On October 28, 2020, Columbine submitted the results of their investigation including a corrective action report, in which Columbine attributed the oil & grease violations to clarifier air compressor failure, which led to excessive crude oil accumulation in the clarifier. The air compressor was repaired, and the accumulated crude oil was pumped out of the clarifier. In Addition, Columbine submitted standard operating procedures for each pretreatment equipment onsite and installed a new cover on the two-stage clarifier.

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

January 1 – June 30, 2021

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

Continuous Coating Corporation (Permit No. 1-021290)

Continuous Coating Corporation (Continuous Coating) manufactures coated steel coils and drywall cornerbead. Steel coils are uncoiled and joined on the coil coating line where they are electro-cleaned with multiple rinses including sulfuric acid. The sulfuric spray, when used, is heated and closed-looped. From

this point, coils proceed through one of three options: zinc electroplating, zinc electroplating followed by chromate conversion coating, or zinc phosphating. Coating is followed by rinsing and an air knife. This is followed by another spray rinse. Water is then removed by use of an air knife. All rinses are counterflow and have multiple uses. The steel is recoiled, slit, roll-formed, punched, cut, packaged, palletized and then delivered to the customer. Wastewater is generated from the various rinses used throughout the process and is treated in a continuous treatment system prior to discharge to the sewer. No wastewater is generated from the manufacture of the drywall corner products.

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

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

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

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

July 1 – December 31, 2020

On November 10, 2020, Cooper & Brain had an oil & grease violation, for which an NOV was issued on December 10, 2020.

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

January 1 – June 30, 2021

On January 6, 2021, Cooper & Brain submitted a corrective action letter to address the November 2020 oil & grease violation. Cooper & Brain attributed the violation to the circulation pump utilized to transfer brine water into the secondary wash tank during the final phase dewatering of the produced crude oil stream. Cooper & Brain suggested that the cause of the violation is excessive pump run time and the inadvertent transfer of finished crude oil to the wash tank. To prevent future violations, the company installed a fail-safe switching system that will eliminate excess run times of the circulation pump. On April 29, 2021, OC San issued an order to cease noncompliance to Cooper and Brain for reporting violations.

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

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

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On January 11, 2021, OC San conducted routine inspection and sampling activities, and performed an inspection of the newly installed pH adjustment pretreatment system. Upon review of the system, it was noted that the system was not installed as proposed as accepted by OC San during the previous reporting period. On March 1, 2021, OC San issued a compliance requirement letter to Corru-Kraft stating that the pH adjustment system was not installed as proposed, noted issues OC San had with the installed system, and required that the system be modified to reflect the previously installed proposal by March 31, 2021.

On March 8, 2021, during a permit renewal inspection, Corru-Kraft indicated that mistakes had been made with the proposal installation due to miscommunication with multiple consultants. On March 16, 2021, OC San received a letter from Corru-Kraft, stating that Corru-Kraft proposed to keep the pretreatment system as installed, as there is a concern of solids being pumped into the pH adjustment tank if wastewater is taken from the second stage of the clarifier. The letter also requested that the final pH probe (which was included in the accepted proposal but not installed) be installed in the discharge line from the pH adjustment system to the third stage of the clarifier.

On May 27, 2021, OC San issued an compliance requirement letter which summarized the March 8, 2021 inspection and the proposal from Corru-Kraft dated March 16, 2021. OC San accepted the modified proposal to operate the pH adjustment system as installed, though it differed from the previously accepted proposal with some exceptions. Corru-Kraft was required to install the final pH probe in the designated sample point and to provide a water balance by July 31, 2021.

OC San will verify the location of the final pH probe and review the water balance calculations in the next reporting period, and will continue to monitor Corru-Kraft's discharge and compliance status on a quarterly basis.

Crest Coating, Inc. (Permit No. 1-021289)

Crest Coating, Inc. (Crest Coating) performs powdercoating and specialty finish application to aluminum and steel parts supplied by outside customers. Operations include paint stripping, alkaline cleaning, phosphate conversion coating, zirconium conversion coating, and zinc phosphate coating. Wastewater is generated from rinses and some spent process chemicals used for cleaning and coating operations. Crest Coating employs a continuous pretreatment system comprised of conventional hydroxide metals precipitation and clarification. Precipitated solids are removed and processed through a filter press. Filter cake is waste-hauled.

January 1 – June 30, 2021

In May 2021, Crest Coating had a monthly average discharge violation for nickel.

OC San will issue an NOV for the May 2021 monthly average discharge violation and continue with enforcement actions during the next reporting period.

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

July 1 – December 31, 2020

On December 3, 2020, DES had a copper violation, for which an NOV was issued on December 17, 2020.

OC San will conduct a compliance inspection during the next reporting period.

January 1 – June 30, 2021

OC San issued NOVs for the October and December 2020 monthly average copper violations, an NOV on January 7 and March 4, 2021, respectively. On February 5, 2021, OC San conducted a compliance inspection at DES to: (1) investigate the root cause of the copper violations detected in DES's wastewater discharge in October and December 2020, (2) follow-up on the preliminary corrective action report submitted on January 1, 2021, and (3) evaluate the adequacy of the pretreatment system to reliably meet daily and monthly discharge limits. The daily limit exceedances also resulted in a copper monthly average discharge limit violation in the month of October and December 2020.

On March 10, 2021, OC San issued a compliance requirement letter requiring DES to: 1) submit a corrective action report, which documents the root cause of the copper violations, 2) adjust pretreatment operation procedures to reliably meet all discharge limits established in Permit No. 1-011142, and 3) submit a proposal to implement automated pH control in the batch treatment system, prior to commingling batch treated wastewater into the continuous pretreatment system.

DES submitted the proposal to implement an automated chemical feed system on June 30, 2021, and its implementation is expected to be completed by during the next reporting period. OC San will continue to monitor DES' discharge and compliance status on a quarterly basis.

Data Solder (Permit No. 1-521761)

Data Solder Inc. (Data Solder) is a job shop printed circuit board manufacturing. Data Solder specializes in hot air solder leveling (HASL) services for the printed circuit board industry. The HASL process consists of applying a thin protective finish of tin-lead solder to select areas of the part's (panel's) surface to prevent copper oxidation and facilitate solderability. Panels are typically masked upon arrival to the facility. They are then pre-cleaned through a conveyorized process line with a ferric chloride microetch and flux. Panels are then soldered in the HASL machine and post cleaned using clean city water. The HASL operation coats the exposed copper with solder by using jets of hot air and submerging the panel in a reservoir of molten solder. Residual flux is removed in the post clean.

Data Solder employs continuous and batch treatment via hydroxide precipitation and flocculation, clarification and neutralization to treat wastestreams generated at the facility.

January 1 – June 30, 2021

On April 13, 2021, during a permit renewal inspection at Data Solder, Data Solder staff indicated that ferric chloride microetch spent solutions commingle with a high volume of rinses in the batch treatment tank. The mixing of concentrated solution with dilute rinses as a partial or complete substitute for adequate treatment to achieve compliance is a violation of OC San's Ordinance No. OCSD-53 and federal regulations. On May 12, 2021, OC San issued a compliance requirement letter requiring that Data Solder segregate concentrated solutions from all rinses, treat concentrated waste separately in the batch treatment system, and conduct multi-day sampling to verify compliance of treated batches with permit discharge limits.

On June 1, 2021, Data Solder submitted a corrective action report and clarified that all rinses are pumped to the continuous treatment system and it does not commingle rinses with concentrated spent solution in the batch treatment tank. OC San will continue to monitor Data Solder's discharge and compliance status on a quarterly basis.

DCOR, LLC (Permit No. 1-111013)

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

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

In February 2020, DCOR submitted a proposal to cease discharge of stormwater to the sewer and re-route the collected stormwater to a storm drain after testing confirms compliance with applicable regulations. Due to the recent pandemic and work slowdown, DCOR requested and was granted an extension to complete the project by end of September 2020.

July 1 – December 31, 2020

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

January 1 – June 30, 2021

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

Diamond Environmental Services, LP (Permit No. 1-600244)

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

July 1 – December 31, 2020

On July 29, 2020, Diamond had a pH violation during an OC San routine inspection and sampling event, for which an NOV was issued on August 13, 2020. On September 8, 2020, a compliance inspection was conducted by OC San as a result of the pH violation. During the inspection it was found that the pH alarm was inoperable while Diamond discharged wastewater not compliant with pH effluent limits. OC San determined that Diamond's manual pH adjustment of industrial wastewater was inadequate for the facility to maintain long-term compliance. As a result of the recent violation and the facility treatment system deficiency, OC San issued a compliance requirement letter on October 29, 2020 which required Diamond to install a 24-hour continuous pH data logger at the sample point, by December 18, 2020. In addition, Diamond was required to submit a proposal to OC San by December 18, 2020 for an automatic batch pH adjustment system and an automatic shutoff valve installed with audible and visual alarms to prevent pH non-compliant discharges from entering OC San's sewerage facilities. Diamond was also required to complete other corrective actions including maintaining spare equipment, performing routine maintenance and calibration of pH equipment, and applying best practices in site housekeeping. Diamond was required to complete the installation of the pH system by January 31, 2021.

January 1 – June 30, 2021

On January 18, 2021, OC San issued another compliance requirement letter requesting an update on the completion of the requirements. On February 9, 2021, a compliance meeting was held, during which Diamond reported that they did not receive the compliance requirement letter issued on October 29, 2020. During this meeting, OC San discussed the requirements issued in 2020 and revised Diamond's compliance schedule. On April 5, 2021, OC San issued a compliance requirement letter that established Diamond's revised compliance schedule, where Diamond is required to install a 24-hour continuous pH data logger at the sample point by April 30, 2021 and submit the proposal for the automatic pH adjustment system and shutoff valve to OC San by May 31, 2021. Diamond completed the installation of the 24-hour continuous pH data logger on June 9, 2021, due to equipment procurement delays. Diamond requested additional time to submit their proposal to review data collected by the data logger in order to complete the design of their pH adjustment system. Diamond submitted their initial proposal on June 14, 2021 but was not accepted by OC San because it had several design issues and discrepancies. Following discussions with Diamond, OC San requested that Diamond provide a revised proposal to address the issues by July 9, 2021.

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

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

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

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

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

that they are continuing manual pH adjustment; however, with the ongoing pH violations, Dr. Smoothie proposed installation of an automated pH adjustment system.

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On March 24, 2021 and April 26, 2021, Dr. Smoothie had further pH violations, for which NOVs were issued on April 1, 2021 and May 6, 2021, respectively. On April 7, 2021, OC San issued a compliance requirement letter which required Dr. Smoothie to attend a compliance meeting. The compliance meeting was held on May 4, 2021, to discuss the inadequacy of the automated pH adjustment system and Dr. Smoothie's practices that caused these violations. On May 11, 2021, OC San issued another compliance requirement letter requiring Dr. Smoothie to provide a proposal by June 15, 2021, to address the inadequacy of their pH system, install audible and visual alarm system as well as an automatic shut off valve. On June 16, 2021, Dr. Smoothie submitted their proposal to install a batch treatment process for their pH adjustment prior to discharging to the sewer in addition to the audible/visual alarms and automatic shut off valves, which OC San accepted on June 22, 2021.

OC San will conduct further enforcement during the next reporting period to follow up on Dr. Smoothie's implementation of their proposed modification of their pH adjustment system.

Ducommun Aerostructures (Permit No. 1-021105)

Ducommun Aerostructures (Ducommun) uses fabrication, machining, and a wet chemical milling process to produce components for the aeronautical industry. In addition to the component manufacturing capabilities, Ducommun operates as a job shop supplying chemical milling services on customer supplied parts. Used on flat sheet, formed, cast, or forged aluminum components, the process can chemically mill selected areas to produce features, size parts, or reduce weight while maintaining the parts structural strength. The wet process is routinely used to remove material to close tolerances from fuselage and wing skins, and other complex contoured parts. Wastewater is generated by the aqueous fume scrubbing, the steam regeneration of the carbon solvent-recovery system, the spent acid deoxidation and soap cleaning solutions, and the associated rinse wastestreams.

The wastewater treatment system at Ducommun consists of a continuous treatment system (pH adjustment tank, equilization tank, 5-stage clarifier, and filter press) and a batch treatment system (holding tank, diatomaceous earth filter, reaction tank, and filter press). These rinses are collected in trenches and flow to a pH neutralization tank where the pH is adjusted with spent deoxidizing solution or sulfuric acid. The waste is then pumped to a rectangular equilization tank where calcium polysulfide is added as a stabilizing flocculant. After wastewater is treated, it then gravity flows to a 5-stage rectangular clarifier, pH adjusted, and then discharged to the sewer.

January 1 – June 30, 2021

During a permit renewal inspection on May 13, 2021, OC San noted that there were open tanks in the wastewater treatment area and other exposed surfaces that allow the collection and subsequent discharge of stormwater to the sewer, which is not in compliance with OC San's stormwater prohibition. On June 7, 2021, OC San issued a compliance requirement letter, requiring Ducommun to develop and submit a

proposal to OC San to cease the discharge of any stormwater to the sewer by June 30, 2021, and complete implementation of the accepted proposal by July 31, 2021. After providing comments to a proposal from Ducommun, a final proposal was submitted to OC San on June 29, 2021. OC San will respond to this proposal during the next reporting period.

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

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

Electrode Technologies, Inc. dba Reid Metal Finishing (Reid), 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. Reid processes products for the aerospace, military, medical, and commercial industries. Wastewater is generated from the rinses used in the various surface finish processes and air scrubber wash water. Reid's pretreatment system consists of chrome reduction, cyanide destruction, hydroxide precipitation and sludge filtration.

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On January 4 and 5, 2021, OC San conducted routine inspection and sampling activities, in addition to a permit renewal inspection on January 5, 2021. In addition to the audit and review of the entire facility, OC San confirmed the installation of the two plate-out systems for cadmium rinses. On January 5 and January 14, 2021, Reid had cadmium violations, for which NOVs were issued on February 4 and April 1, 2021, respectively. OC San also issued an NOV on January 14, 2021 for the October 2020 cadmium monthly limit exceedance.

On March 19, 2021, OC San received an email from Reid providing an explanation and corrective action to the January 2021 cadmium violations. It was determined that production staff were transporting parts submerged in cadmium process and rinse tanks to additional tanks not sent to the cadmium/cyanide destruction system, but rather to the chromium reduction line which did not provide adequate cadmium removal. OC San issued an NOV on April 8, 2021 for the January 2021 cadmium monthly limit exceedance.

On April 27, 2021, OC San issued a compliance requirement letter requiring Reid to attend a compliance meeting letter due to the repeated cadmium violations. On May 10, 2021, a compliance meeting was held between OC San and Reid. Reid again attributed the cadmium violations to cross-contamination from the cadmium rinse tanks in the rear of the plating line in one unit to other plating lines and wastewater collection areas, additional cadmium tanks added to the process line in 2020, and error from operators not following proper plating procedures. To aid in the reduction of cadmium concentrations, Reid installed an additional and larger volume cadmium plate-out system upstream of the continuous cyanide destruct system, installed

cameras above the cadmium process tanks in order to better monitor employees during plating operations, scheduled formal training for their operators, and proposed additional modifications such as segregating cadmium tanks and relocating a spin-dryer. OC San acknowledged the steps Reid was taking to prevent further cadmium violations, but cautioned that advanced treatment for cadmium would be required by Reid to ensure long term compliance with all discharge limits. To that end, OC San requested Reid submit a proposal to achieve and maintain long-term compliance with the cadmium discharge limits.

On May 11 and 12, 2021, during OC San's routine inspection and sampling activities conducted, OC San noted that the cyanide destruction system had been relocated, and that the first stage had increased in volume. On May 17, 2021, OC San received a letter from Reid, in which Reid stated that the cadmium spin-dryer and associated cadmium rinse tanks were located a substantial distance from each other, resulting in cadmium-bearing dragout rinses being collected in areas not designed for cadmium treatment. Reid also noted several modifications and proposals in the letter including the relocation of the cyanide destruct system, an increase in capacity in the first stage of the cyanide destruct system, and proposals for various tank/system relocations and additional recycling processes.

In May and June 2021, Reid had additional cadmium monthly average discharge limit violations.

OC San will issue NOVs for these monthly discharge limit violations, issue a compliance requirement letter, review the proposals submitted by Reid to reduce and/or eliminate cadmium discharges, and will continue to monitor Reid'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.

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

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

discrepancies in water use at the facility. OC San requested Electrolurgy to conduct two additional months of water balance study.

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 15, 2021, OC San conducted a compliance inspection to verify completion of the installation of the proposed effluent meter. During the inspection, OC San noted that the meter had not been installed by the due date. Following the compliance inspection, OC San issued a compliance requirement letter on January 25, 2021, directing Electrolurgy to install the effluent meter immediately. On February 4, 2021, OC San conducted a compliance inspection and confirmed that the effluent meter was installed and operational.

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

On January 12, 2021, OC San conducted a permit renewal inspection and confirmed that Electron Plating had installed a roof extension over their pretreatment area and had removed the roof drain line. OC San issued an NOV on June 3, 2021 for the March 2021 chromium monthly violation. On April 19, 2021, OC San conducted a compliance inspection during which Electron Plating attributed the cause of the monthly violation for chromium to a failure of their ORP probe. Electron Plating replaced and recalibrated a new ORP probe as their corrective action.

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

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

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

July 1 – December 31, 2020

In the month of October 2020, EPSI had a nickel monthly average discharge limit violation. OC San will issue an NOV for this monthly limit violation during the next reporting period.

January 1 – June 30, 2021

On January 7, 2021, OC San issued an NOV for the October 2020 nickel monthly discharge violation. On January 28, 2021, EPSI submitted their corrective action letter but failed to determine the exact cause or source of the violation. The company's investigation involved reviewing all the past daily facility inspection logs, daily floor inspection logs, permit-by-rule inspections logs, sumps, pipes for rinse water for any leaks, pumps and valves that transfer rinse water, holding tanks, and pH probe records. EPSI noted that the most likely cause was due to human error. As a corrective action, EPSI stated that they will implement a two-person review of all the wastewater analysis reports and conduct additional sampling if a monthly violation is detected from a single sample result.

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

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

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

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

July 1 – December 31, 2020

On November 2, 2020, OC San conducted a compliance inspection at Excello to: (1) investigate the root cause of the copper mass violation that occurred in February 2020, (2) review the accuracy of the copper measurements in the batch treatment, (3) review the pH meters calibration records, (4) evaluate the adequacy of the batch treatment system and the use of DTC, and (5) follow-up on the requirement to maintain a certified industrial wastewater operator onsite.

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

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

January 1 – June 30, 2021

On December 9, 2020, OC San issued a compliance requirement letter requesting Excello to submit a written documentation of the facility's wastewater treatment operator's qualifications and certification. On December 29, 2020, OC San received a response to the compliance requirement letter; however, the documentation submitted by Excello did not demonstrate the facility's compliance with the third qualified wastewater treatment operator requirement. On March 10, 2021, OC San issued another compliance requirement letter notifying Excello that the facility is not in compliance with the requirements listed in the Permit No. 1-521855.

On March 16, 2021, Excello submitted a Certificate of Bachelor of Science (special subject Chemistry) issued to the company's laboratory technician from non-ABET accredited university. Excello shut down its facility located at 1924 Nancita Circle, Placentia on April 26, 2021, and relocated its business operations to a new location in Anaheim. OC San will continue to monitor Excello's discharge and compliance status on a quarterly basis at the new location.

Fabrication Concepts Corporation (Permit No. 1-011068)

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

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

maintain compliance with the discharge requirements, Fabcon committed to increasing the frequency of the pump out of the iron phosphate tank and clarifier from annually to semi-annually and performing a thorough pressure wash after emptying.

July 1 – December 31, 2020

On July 2, 2020, OC San issued an NOV for the April 2020 zinc monthly limit exceedance. On August 7, 2020, Fabcon submitted waste manifests for the offsite disposal of spent phosphate solution and waste solids from the clarifier for the last 1.5 years. On August 8, 2020, OC San verified that the waste-hauled volumes were in agreement with the capacity of the phosphate tank and clarifier.

Fabcon had no further violations during this reporting period.

January 1 – June 30, 2021

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

FMH Aerospace Corp. DBA FMH Corporation (Permit No. 1-571331)

FMH Aerospace Corp (FMH) manufactures complex fabricated components including expansion and flexible joints, formed and welded metal bellows, high pressure (braided) gas or fluid transfer lines, and pressurized ducts for aerospace, commercial, industrial, military/defense, and transportation applications. Many of the fabricated parts require extensive production tooling; therefore, a large portion of the facility is dedicated to general machine shop operations. Wastewater is generated primarily from the rinses following the surface cleaning and finishing operations performed on the metal parts during the various manufacturing stages, contact cooling for seam (resistance) welding, and secondarily by hydrostatic testing and fluorescent penetrant inspection conducted on the assemblies. The pretreatment system at FMH consists solely of pH adjustment.

January 1 – June 30, 2021

On January 15, 2021, OC San conducted a compliance inspection at FMH to verify completion of the installation of the pretreatment system as required by Permit No. 1-571331. During the inspection, OC San observed that some of the rinse tanks in the clean room bypassed the pretreatment system. On January 25, 2021, OC San issued a compliance requirement letter directing FMH to connect the remaining tanks in the clean room to the pretreatment system immediately. On February 18, 2021, FMH notified OC San that the company was working with contractors to tie-in the remaining tanks to the sewer system. On March 16, 2021, FMH notified OC San that they had disconnected the remaining rinse tanks from the sewer system by locking the exit valve on each tank in the closed position.

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

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

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

July 1 – December 31, 2020

During an inspection on October 8, 2020, OC San staff observed that the composite sampling device, which had been set up the previous day, had been tampered with, where the device had been moved and the evidence tape damaged on the sampler tubing and sample device. In addition, during inspections on October 7 and October 8, 2020, OC San staff noted potential discharge of surface runoff to the sample point, which is prohibited. OC San issued GKN a compliance requirement letter on November 16, 2020,

requiring the facility to submit a proposal to mitigate stormwater and runoff from entering the sewer by December 31, 2020 and complete installation by January 31, 2021, as well as the requirement to take the appropriate action necessary to prevent disruption and/or tampering of OC San's sampling equipment.

January 1 – June 30, 2021

GKN requested an extension to submit their proposal as they were conducting a site survey and wanted to use the results from their survey to develop their proposal. OC San granted GKN the extension to submit their proposal with the revised deadline of February 15, 2021. On March 16, 2021, GKN submitted their proposal to close off all drain connections to the sewer and to use the existing vaults to collect stormwater and pump it to a separate collection system for storage and disposal. After corresponding with GKN to understand the scope of the stormwater and runoff mitigation installation, OC San issued a compliance requirement letter on April 12, 2021, to extend the deadline to implement the proposal to May 31, 2021. On May 26, 2021, GKN requested a 2-week extension to implement the proposal as they had a delay in finalizing their vendor. OC San granted the 2-week extension with a revised date of June 11, 2021, to complete the implementation of the proposal. On June 22, 2021, GKN informed OC San that the installation has been completed.

OC San will continue enforcement during the next reporting period to evaluate the completion of GKN's installation and will continue to monitor GKN's discharge and compliance status during the next quarter.

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

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

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

July 1 – December 31, 2020

On August 3 and August 4, 2020, Golden state had further pH violations, for which an NOV was issued on August 20, 2020. As a result of the recurring pH violations, on August 10, 2020 Golden State was issued an Order to Cease Noncompliance Discharge and required to attend a compliance meeting, which was held on August 18, 2020. During the compliance meeting, OC San discussed the multiple noncompliance issues at Golden State's facility including dilution, process changes without notifying OC San, continued pH noncompliance, receipt of unauthorized waste, and bypass of treatment. OC San directed Golden State to submit a proposal to address the noncompliance issues, which Golden State failed to meet. On October 8, 2020, OC San issued a compliance requirement letter with new completion dates for the pH chart recorder and proposal by a professional engineer for the installation of an automatic pH adjustment system and automatic shutoff valve. On September 2 and October 28, 2020, Golden State had additional pH violations, for which NOV's were issued on October 1 and November 12, 2020, respectively. The September 2 violation occurred during a compliance inspection on that same day. As a result of building

code and zoning violations, Golden State was informed by the City of Anaheim that Golden State could no longer operate in the current building and would need to vacate by November 30, 2020. Thus, on November 25, 2020, OC San issued a compliance requirement letter instructing Golden State that Permit No. 1-600975 would be voided on November 30, 2020. On December 1, 2020, OC San issued Golden State another order to cease discharge wastewater without a valid permit.

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

January 1 – June 30, 2021

During a routine inspection on February 25, 2021, OC San staff noted the sample point and discharge piping connecting the previous process to the sewer had been removed. Various piece of equipment remained in the yard but there were no active process operations in the building.

Since Permit No. 1-600975 is void, no further monitoring is required.

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 equipped with a pH monitoring and adjustment system and runs through a series of bag filters before discharging to the sewer.

January 1 – June 30, 2021

During a permit renewal inspection on January 12, 2021, OC San noted potential discharge of surface runoff from Goodwin's tank farm area to the sample point, which is prohibited by OC San's Ordinance. OC San issued a compliance requirement letter on January 27, 2021, requiring the facility to submit a proposal to mitigate stormwater and runoff from entering the sewer by March 15, 2021, and to implement the accepted proposal by April 30, 2021. Goodwin submitted their stormwater mitigation proposal on March 12, 2021, which did not adequately address the comingling of stormwater with process wastewater. After several discussions, Goodwin proposed to install valves on their process lines which will only be opened during processing hours and will remain closed during non-operating hours and rain events. Stormwater will be directed to a separate stormwater filtration system. Goodwin also established a log to keep track of the valve position. OC San accepted this proposal on March 29, 2021. Goodwin requested an extension for the implementation of the proposal due to the long lead time in procuring the stormwater filtration equipment. OC San required Goodwin to implement the isolation valves and logs by April 30, 2021, to prevent comingling of process wastewater and stormwater, but granted the extension to complete the remaining equipment installation by June 30, 2021.

OC San will conduct a compliance inspection in the next reporting period to evaluate the completion of Goodwin's installation and will continue to monitor Goodwin's discharge and compliance status on a quarterly basis.

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

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

In April 2020, Graphic Packaging had a pH violation. In June 2020, Graphic Packaging submitted their corrective action report to address the pH violation. Graphic Packaging attributed the violation to the use of citrus-based cleaner to rinse glue pots. Under normal facility conditions, the various combined wastestreams neutralize to the compliant pH range upon commingling. Graphic Packaging reported that the low flow conditions during the time of the violation due to a scheduled maintenance of the printing

process while the Finishing Department was cleaning the glue pots resulted in a pH imbalance in the wastestream. To prevent future violations, the company will ensure that discharge will be stopped if all sources of wastewater are not simultaneously discharging to the sewer system.

January 1 – June 30, 2021

On March 2, 2021, OC San conducted a permit renewal inspection during which Graphic Packaging had a pH violation. On March 18, 2021, OC San issued an NOV for this violation. On March 31, 2021, Graphic Packaging submitted their corrective action letter indicating that the discharge of fountain solution mixture at the various press operations caused the pH violation. OC San directed Graphic Packaging to provide a comprehensive solution to the pH violation. Graphic packaging revised their corrective action report which included installation of a batch system at the glue room with pre-treatment by adding a pH conditioner, installation of a batch system at the press room with pretreatment and a pH conditioner, and batch logs at each wastewater generation source.

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

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

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

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

January 1 – June 30, 2021

On January 20, 2021, Harbor Truck had a zinc violation, for which an NOV was issued on February 4, 2021. This daily limit exceedance and Harbor Truck's January 2021 self-monitoring also resulted in a monthly zinc violation. On February 26, 2021, Harbor Truck submitted their corrective action report attributing the root cause of the zinc violation to the first-stage treatment pump being turned off accidentally during the Covid-19 spray down/cleaning procedures. As a corrective action, Harbor has implemented daily checks to include more detailed inspection steps and have installed an additional security measure on the pump to prevent further occurrence of this issue. OC San advised Harbor Truck to conduct additional sampling to demonstrate compliance with the new measures. On March 2, 2021, OC San conducted a compliance inspection at Harbor Truck to resample which showed compliance with discharge limits. On April 8, 2021, OC San issued an NOV to Harbor Truck for the January 2021 zinc monthly limit violation.

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

Hi Tech Solder (Permit No. 1-521790)

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

In January 2020, Hi Tech Solder had a copper violation. In March 2020, OC San conducted a compliance inspection and resampling during which Hi Tech Solder reported that the copper violation was due to excessive solids buildup in the pretreatment system resulting in carryover of solids into the sample point.

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

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

July 1 – December 31, 2020

On July 2 and August 20, 2020, OC San issued NOVs for the April and May 2020 copper and lead monthly limit exceedances, respectively. On July 14, 2020, OC San issued a compliance requirement letter requiring Hi Tech to submit the overdue corrective action report, along with a proposal to implement Best Available Technology (BAT) to treat copper slug concentrations from the spent microetch solution. On September 29, 2020, OC San issued a follow up compliance requirement letter due to Hi Tech's failure to submit the corrective action report and BAT proposal.

On October 14, 2020, OC San issued an order to cease noncompliant discharge and reporting due to Hi Tech's continued failure to submit the required corrective action report and BAT proposal. On October 27, 2020, OC San held a compliance meeting with Hi Tech to discuss the past due requirements. On November 18, 2020, Hi Tech submitted the corrective action report, in which Hi Tech informed OC San of its decision to wastehaul the spent micro-etch solution in lieu of installing a pretreatment system. On November 23, 2020, OC San issued a compliance requirement letter regarding Hi Tech's decision to wastehaul the spent micro-etch solution and as a result, requiring the facility to maintain waste manifests onsite for OC San's review.

January 1 – June 30, 2021

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

Hixson Metal Finishing (Permit No. 1-061115)

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

In December 2017 and through 2018, OC San issued Hixson multiple enforcement actions including NOVs, compliance meetings, an order to cease noncompliant discharges, and a settlement agreement. The settlement agreement included administrative penalties for multiple discharge violations of cadmium, copper, chromium, nickel, as well as requirements to address pretreatment deficiencies identified by OC San in the facility including lack of operating procedures and lack of pretreatment system control and

maintenance. In addition to the settlement agreement requirements, installation of an ion exchange system was necessary as a result Hixson's limits changing from Pretreatment Standards of Existing Sources (PSES) designation to Pretreatment Standards of New Sources (PSNS). In March 2019, Hixson's new permit limits under the Pretreatment Standards for New Sources (PSNS) became effective. In May and June 2019, Hixson had cadmium daily and monthly average discharge limit violations. Hixson was unable to determine the source of the violation, and it was noted that most sampling results prior had been well below monthly average limits and daily average limits, as were the following samples.

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

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

July 1 – December 31, 2020

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

Hixson had no further violations during this reporting period.

January 1 – June 30, 2021

On March 2, 2021, Hixson had a copper violation for which an NOV was issued on May 6, 2021. OC San will continue enforcement during the next reporting period and continue to monitor Hixson's discharge and compliance status on a quarterly basis.

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

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

In February 2019, Howmet had cadmium and molybdenum violations. In June 2019, OC San conducted a compliance inspection and resampling, during which Howmet identified a lubricant product in use at the facility as the likely source of the molybdenum violation. The resampling results showed compliance. However, routine sampling conducted later that month showed another molybdenum violation. Howmet also exceeded its cyanide (amenable) monthly average discharge limit in June 2019. In August 2019, OC San conducted a compliance inspection during which Howmet detailed another operation that is a possible source of molybdenum, which was the cleaning of dip baskets with dry-film lubricant (containing

molybdenum) in one of the rinses. Howmet had trained its staff to clean the baskets in the molten salt bath specifically designed for that purpose. In September 2019, Howmet submitted a corrective action report, which stated that the company had re-evaluated the cyanide treatment equipment and replaced the ORP and pH measurement equipment to improve performance. In the same month, Howmet performed voluntary multi-day self-monitoring which yielded further molybdenum violations. In October 2019, Howmet was published as significantly non-compliant for the FY2018-2019 reporting period due to its chronic and acute molybdenum discharge violations. In November 2019, OC San issued a compliance requirement letter requiring Howmet to attend a compliance meeting, which was held in December 2019. During the meeting, Howmet detailed efforts taken to date intended to improve compliance including employee training, replaced control and treatment equipment (ORP, pH and new microfiltration media), substitution of cooling tower additive to a non-molybdenum chemical, and the implementation of on-site laboratory molybdenum testing of the suspect solutions prior to discharge. Howmet submitted a letter summarizing the afore-mentioned corrective actions following the compliance meeting.

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

July 1 – December 31, 2020

On July 23, 2020, OC San issued NOVs for Howmet's April 2020 cyanide (total and amenable) monthly limit exceedances, which had been addressed in the previous reporting period. Howmet had no further violations during this reporting period.

January 1 – June 30, 2021

On April 1, 2021, OC San issued an NOV for Howmet's January 2021 cyanide (total) monthly limit exceedance. On May 10, 2021, OC San conducted a compliance inspection during which Howmet attributed the cause of the cyanide violation to insufficient calibration of their pH and ORP probes and the presence of small metal objects in their cyanide holding tank that could have contributed to cyanide metal complexes. Howmet submitted a corrective action report on May 27, 2021, which includes weekly calibration of probes and semi-annual cleaning of their holding tanks. During the compliance inspection, OC San also noted potential stormwater intrusion through the open-top outdoor tanks used in Howmet's pretreatment system. OC San issued a compliance requirement letter on June 9, 2021, requiring Howmet to submit a proposal to mitigate stormwater and runoff from entering the sewer by July 15, 2021, and to implement the accepted proposal by August 31, 2021.

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

Imperial Plating (Permit No. 1-031106)

Imperial Plating is a plating job shop that performs various metal finishing operations on steel and aluminum parts. Wastewater generating processes at this facility include zinc barrel plating, acid activation, chromate conversion coating and alkaline cleaning with associated rinses. Wastewater discharges through a continuous treatment system which includes pH adjustments, hexavalent chromium reduction, hydroxide precipitation, coagulation and flocculation, clarification, and sludge dewatering before discharging into the sewer system.

January 1 – June 30, 2021

On February 4, 2021, Imperial Plating had a cadmium and zinc violation, for which an NOV was issued on February 25, 2021. The daily limit exceedance also resulted in monthly average discharge limit violations for cadmium and zinc. On March 23, 2021, Imperial Plating submitted a corrective action report that attributed the violations to a failure in their sludge pump that prevented sludge removal from the clarifier. In addition, Imperial Plating also had a failure in their polymer dosing pump. Imperial Plating's corrective actions include acquiring replacement parts and back up units for the sludge pump and dosing pump. On

March 24, 2021, OC San conducted a compliance inspection during which OC San verified that the corrective actions had been implemented and identified the automotive parts that Imperial Plating processes as the potential source of cadmium for the facility. On May 6, 2021, OC San issued an NOV for the February 2021 cadmium and zinc monthly limit exceedances. As of June 8, 2021, Imperial Plating is out of business and their permit has been voided.

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

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

July 1 – December 31, 2020

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

JFTB had no further compliance issues during this reporting period.

January 1 – June 30, 2021

JFTB completed the effluent meter calibration on June 22, 2021. JFTB had no violations during this reporting period. OC San will continue to monitor JFTB's discharge and compliance status on a quarterly basis.

Kryler Corporation (Permit No. 1-021428)

Kryler Corporation (Kryler) performs various metal finishing operations on stainless steel and titanium parts. Wastewater generating processes includes chrome and cadmium plating, acid etching, nitric passivation, anodizing and alkaline cleaning with the associated rinses. Wastewater from various rinses is collected and discharged to the sewer. Kryler does not have a pretreatment system and waste-hauls spent solutions and some static drag outs.

January 1 – June 30, 2021

During a routine inspection in October 2020, OC San observed a large quantity of water actively discharging from Kryler's chrome tanks single pass non-contact cooling system to the sampling location and the sewer, which is prohibited by OC San's Ordinance. On February 9, 2021, OC San issued a compliance requirement letter requiring Kryler to cease discharge of unpolluted water to the sample point and to provide a proposal to remove the single pass cooling water discharge by March 15, 2021, and complete implementation of the accepted proposal by April 30, 2021. On March 31, 2021, Kryler proposed to remove the single pass cooling water discharge by installing a closed loop chiller system, which OC San accepted. On April 27, 2021, Kryler informed OC San that they were facing a delay in sizing and acquiring the proper chiller unit; however, the discharge of the single pass cooling water to the sewer had ceased. On June 3, 2021, OC San conducted a compliance inspection, during which OC San observed that the single pass cooling water piping was still plumbed to the sample location. OC San required Kryler to remove the piping, which was completed on June 11, 2021. On June 8, 2021, OC San issued a compliance requirement letter to extend Kryler's deadline to install the closed loop chiller system and to require Kryler to conduct wastewater characterization of their rinses and final effluent by June 30, 2021.

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

La Habra Bakery (Permit No. 1-031029)

La Habra Bakery is a highly automated bakery that mixes dough, bakes, packages, and ships baked goods to retail outlets. Products include bread, buns, English muffins, and doughnuts. Wastewater is generated from washing, rinsing, and sterilization of the mixing tanks and associated cookware with alkaline soaps,

detergents, and cleaners. Wastewater pretreatment includes an in-ground clarifier, continuous pH control system and effluent flow monitoring system.

In June 2020, La Habra Bakery had pH violations.

July 1 – December 31, 2020

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

La Habra Bakery had no further violations during this reporting period.

January 1 – June 30, 2021

La Habra Bakery had no violations during this reporting period. OC San will continue to monitor La Habra Bakery'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, portable 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.

January 1 – June 2021

LGM's permit became effective April 1, 2021. In the month of June 2021, LGM had a methylene chloride monthly average discharge limit violation. OC San will issue an NOV for this monthly limit violation during the next reporting period and will continue to monitor LGM'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. Depending on the condition of parts received, Linco may use sulfuric acid or muriatic acid to remove oxides prior to cold or hot strip operations.

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 rinsewater 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 waste-hauled.

January 1 – June 30, 2021

On March 18, 2021, Linco had a molybdenum violation for which an NOV was issued on April 15, 2021. On May 5, 2021, OC San conducted a compliance inspection and resample for molybdenum during which

Linco was unable to identify the source for the molybdenum violation. However, Linco reported to OC San that the facility does not maintain regular cleanout of debris or solids that may accumulate in the process tanks. Thus, OC San directed Linco to collect samples from various process tanks to identify the possible source. On May 6, 2021, Linco had a pH violation for which an NOV was issued on May 20, 2021. OC San determined Linco did not effectively maintain operation and maintenance of its pretreatment equipment. On May 27, 2021, Linco submitted analytical results to OC San for samples collected from various process tanks on May 11, 2021. The analytical results yielded elevated molybdenum concentrations in several tanks possibly identifying the molybdenum source for the violation that occurred March 18, 2021. On June 8, 2021, OC San completed a resample for pH and the results showed compliance. On June 17, 2021, OC updated the categorical designation for Linco from Local Limits (40 CFR 403.5 (d)) to Metal Finishing (40 CFR 433.17). On June 21, 2021, OC San issued a compliance requirement letter that required Linco to develop an operations and maintenance manual that included a program for regular maintenance and calibration of pH equipment. OC San also required Linco to institute regular cleanout of the process rinse tanks, the pretreatment system, and the designated sample point on a weekly basis, at a minimum, and document each activity.

OC San will evaluate Linco's compliance with these requirements during the next reporting period and continue to monitor the Linco's discharge and compliance status.

LM Chrome Corporation (Permit No. 1-511361)

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

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

July 1 – December 31, 2020

On October 12, 2020, OC San verified the repairs made to the damaged portion of the lamella clarifier, which had been covered with a roof to prevent stormwater intrusion. LM Chrome had a cyanide monthly average discharge violation for Oct 2020, for which an Notice of Violation will be issued during the next reporting period.

LM Chrome had no further compliance issues during this reporting period.

January 1 – June 30, 2021

A Notice of Violation was issued on January 7, 2021 for the October 2020 cyanide monthly average discharge limit violation. LM Chrome noted the probes and controlling devices in the cyanide destruct system may not have been providing accurate values and required more frequent calibration. As a corrective action, LM Chrome had all pH and ORP controllers recalibrated, and increased laboratory

verification testing of the wastewater from the cyanide destruct system. LM Chrome also updated their calibration schedule and record logs to ensure all probes and controllers are operating effectively.

LM Chrome had no further violations. OC San will continue to monitor LM Chrome's discharge and compliance status on a quarterly basis.

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

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

Los Alamitos Race Course (Permit No. 2-532373)

Los Alamitos Race Course (LARC) is a horse racing track in Cypress. Wastewater is generated from the cleaning and maintenance of horse stables and training areas.

January 1 – June 30, 2021

On February 24, 2021, OC San conducted an inspection at a neighboring facility (owned by LARC). During the inspection, OC San staff observed a storm grate open to stormwater. The storm grate discharges water to a three-stage clarifier with a sample box, which then flows to OC San's sewer which is in violation of OC San's stormwater prohibition.

On April 28, 2021, OC San issued a compliance requirement letter to LARC, requiring a proposal to mitigate stormwater to OC San's sewer by June 15, 2021.

On May 21, 2021, LARC submitted a proposal to OC San to cap the drain line that discharges into the clarifier, then back fill the area with concrete to match the existing surface finish, eliminating the storm grate. OC San accepted this proposal on May 21, 2021. OC San received confirmation on June 22, 2021, that the storm grate had been abandoned, mitigating the discharge of stormwater to the sewer.

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

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

McKenna Labs, Inc. (McKenna) produces & packages various personal care products (lotions, gels creams, liquids, scrubs, serums, oils & pastes). These products are blended on site according to specified recipes and packaged for sale to end users. The blending and packaging equipment is washed & sanitized using sodium hypochlorite. McKenna does not currently have any pretreatment but is in the process of installing a grease interceptor.

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

January 1 – June 30, 2021

On January 13, 2021, McKenna had a zinc violation, for which an NOV was issued on January 26, 2021. McKenna attributed the violation to improper cleaning procedure for their bottling equipment. On April 8, 2021, OC San received an email from McKenna stating that the effluent meter was damaged due to excavation work around the area and that they had to bypass the compliance sample point and divert the wastewater into a drum before discharging into the sewer, which is prohibited by OC San's Ordinance. On April 14, 2021, OC San conducted a compliance inspection, during which OC San reviewed the current discharge configuration and established an interim compliance sample point until a permanent solution is implemented. On May 17, 2021, OC San issued a compliance requirement letter requiring McKenna to provide a proposal to measure the volume of wastewater discharged, a proposal for the location of a representative sample point for the interim and permanent system, and a formal proposal for the planned modifications to their system and to implement the accepted proposals by July 31, 2021. McKenna submitted their proposal to install a new flowmeter, a grease interceptor, and a new sampling location downstream of the interceptor, which OC San accepted on May 19, 2021.

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

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

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

July 1 – December 31, 2020

On November 20, 2020, Meggitt had a lead violation, for which an NOV was issued on December 17, 2020. In addition, Meggitt had a lead daily limit violation in December 2020, lead monthly limit violations in November and December 2019, and a silver monthly limit violation in November 2019.

January 1 – June 30, 2021

On January 15, 2021, OC San conducted a compliance inspection at the facility during which Meggitt submitted their corrective action report attributing the recent lead violation to a lead slurry-laden parts washing process that happens on an infrequent basis. Meggitt's corrective action consisted of changing the cleaning methodology of these parts by implementing a pre-cleaning step that would remove the lead

slurry/excess material before cleaning the parts. On January 28, 2021, OC San issued an NOV for the December 2020 lead daily limit exceedance. In the month of January 2021, Meggitt had another lead monthly limit exceedance. Due to the chronic nature of the recent lead violations, OC San directed Meggitt to revise their initial corrective action report. On February 4, 2021, OC San issued an NOV for the November 2020 lead and silver monthly limit exceedances. In the month of February, Meggitt had another lead monthly exceedance. On February 25, 2021, Meggitt submitted a revised corrective action letter to address the chronic nature of the violations. Meggitt notified OC San that all lead parts cleaning from the ceramic lapping operation process on-site will be contained, and waste-hauled. Additionally, Meggitt also notified OC San that they will waste-haul the wastewater generated from one step of the silver-plating process that includes a periodic cleaning of the plating container because of the concentrated nature of that specific wastewater. On March 4, 2021, OC San issued an NOV for the December 2020 lead monthly violation. On March 26, 2021, OC San notified Meggitt that Permit No. 1-601115 was revised effective May 1, 2021, to increase the self-monitoring frequency for lead and silver from quarterly to monthly. Additionally, OC San added a requirement on Meggitt's revised permit to prohibit discharge from any initial rinses associated with the periodic cleaning of the plating container in the silver-plating process and the lead-slurry related parts without prior notification to and authorization from OC San.

On April 8, 2021, OC San issued an NOV for the January 2021 monthly lead violation. On May 6, 2021, OC San issued an NOV for the February 2021 lead monthly violation.

Meggitt had no further violations during this reporting period. OC San will continue to monitor Meggitt'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, 2020

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

January 1 – June 30, 2021

Micrometals had no violations during this report period. OC San will continue to monitor Micrometals' discharge and compliance status on a quarterly basis.

National Construction Rentals (Permit No. 1-600652)

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

In February and March 2019, National had pH violations, and was issued NOVs. In May 2019, OC San issued a compliance requirement letter directing National to attend a compliance meeting to discuss the non-compliant pH discharges, as well as National's failure to submit several proposals and deliverables between December 2018 and February 2019. In June 2019, OC San held a compliance meeting with National during which the company indicated that the source of the pH violations was a chemical containing hydrochloric acid used in the portable toilet washing process. National had since discontinued the use of the chemical from the washing process. Following the compliance meeting, OC San issued a second

compliance requirement letter directing National to install an automated pH adjustment system, propose a stormwater mitigation plan to prevent stormwater from entering the three-stage clarifier as prohibited by OC San's Ordinance, and submit a Slug Discharge Control Plan.

In July 2019, OC San issued another compliance requirement letter for National's failure to submit all of the information required in the previous compliance requirement letter. In September 2019, as no proposals or plans had still been received, OC San issued an order to cease noncompliance. In this letter, National was directed to attend a compliance meeting. In October 2019, OC San held the compliance meeting with National, during which National stated that there had been a disconnect between staff and their two consultants as to who was responsible for various submittals. OC San reiterated the need for a stormwater mitigation plan and the required pH equipment. During the compliance meeting, OC San informed National of its intent to issue an administrative complaint but gave National the option to enter into a settlement agreement to settle the administrative fines related to the noncompliances. National agreed to settle the matter with OC San.

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

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

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

July 1 – December 31, 2020

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

National had no further compliance issues during this reporting period.

January 1 – June 30, 2021

On February 24, 2021, National had a pH violation, for which an NOV was issued on March 11, 2021. National informed OC San that the pH probe in the pH adjustment system appeared dirty during the February 24, 2021 inspection. The pH probe was cleaned and re-calibrated that afternoon and confirmed routine pH probe maintenance through their log records. The pH on February 25, 2021, was compliant, and had no additional noncompliant discharges during the remainder of the reporting period.

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

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

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

July 1 – December 31, 2020

On December 22, 2020, Newlight had a copper violation, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2021

On January 28, 2021, OC San issued an NOV for the December 2020 copper violations and conducted a compliance inspection to investigate the source of the copper violation from December 2020. While a root cause was not determined, Newlight had relocated the sample port to provide a representative sample. On March 12, 2021, Newlight provided a corrective action report stating that a copper rich solution is used in the process to grow microorganisms and that an operator inadvertently discharged a batch from an incomplete operation where the copper was not consumed. Newlight has instituted administrative procedures that requires approval before discharging the proprietary copper solution to ensure that copper is consumed and not discharged to the sewer. Newlight's monitoring requirements were also revised to include monthly copper sampling.

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

Nobel Biocare USA, LLC (Permit No. (1-521801)

Nobel Biocare specializes in manufacturing of high-end titanium implants using CNC machines and chemical surface treatments. Abutments, implants, and the screws that hold them together are manufactured from titanium wire and bar stock using CNC machines for threading and cutting. After machining, the titanium parts undergo various polishing and microblast surface finishing before wet processing with passivation/coloring and desensitizing (tiumite) surface treatments using dilute sulfuric/phosphoric acid solutions and rinses. The tiumite and coloring processes are primarily accomplished in stand-alone enclosed robotic surface treatment units, where baskets of parts are loaded onto a robotic arm, then colored/desensitized and rinsed in separate chambers within the units. Nobel Biocare has a total of eight coloring/tiumite surface treatment systems, along with two original manual process lines that are used infrequently.

Pretreatment at Nobel Biocare consists of an automatic pH neutralization followed by a filtering system.

January 1 – June 30, 2021

On January 27, 2021, OC San conducted a permit renewal inspection at Nobel Biocare and learned that the etching/anodizing spent solutions are blended with high quality rinses within Holding Tank (T01). Permit No. 1-521801 issued by OC San to Nobel Biocare included a special condition requirement to submit a proposal to implement Best Available Technology (BAT) treatment to reduce heavy metals concentrations from the etching/anodizing spent solutions, prior to mixing with high quality water from rinses in the Holding Tank (T01).

On April 20, 2021, Nobel Biocare submitted a multi-day sampling and analysis of the chemical etching and anodizing spent solutions to OC San for review. The results of the spent solutions characterization showed nondetectable levels of metals in all samples collected between March 31, 2021, through April 2, 2021. Nobel Biocare provided further information in safety data sheets (SDS) that demonstrated the current solutions in use do not contribute pollutants of concern. As a result, OC San issued a compliance

requirement letter on May 17, 2021, concluding that treatment of the etching and anodizing spent solutions was not required. OC San may revisit this evaluation should there be a change at the facility, additional information becomes available, or a noncompliance occurs.

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

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

In April 2021, Nor-Cal Main submitted modifications to the proposal accepted by OC San on November 5, 2020 for review. The proposed modifications updated the pretreatment system design to consolidate production wastewater and reduce the number of discharge points from two locations to one, and install a new designated compliance sample point.

On June 9, 2021, OC San accepted the modifications. Nor-Cal Main expects upgrades and improvements to its wastewater treatment system to be completed by September 2021. Following completion, Nor-Cal Main will request OC San to close one of two existing wastewater discharge permits, provided the facility will only utilize one discharge location for the discharge of regulated wastewater.

Nor-Cal Main has complied with the probation order requirements, and has had no further violations during this reporting period. OC San will continue to evaluate Nor-Cal Main's discharge and compliance status on a quarterly basis.

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

In April 2021, Nor-Cal NCB submitted modifications to the proposal accepted by OC San on November 5, 2020 for review. The proposed modifications updated the pretreatment system design to consolidate production wastewater and reduce the number of discharge points from the two locations to one, and install a new designated compliance sample point.

On June 9, 2021, OC San accepted the modifications. Nor-Cal NCB expects upgrades and improvements to its wastewater treatment system to be completed by September 2021. Following completion, Nor-Cal NCB will request OC San to close one of two existing wastewater discharge permits, provided the facility will only utilize one discharge location for the discharge of regulated wastewater.

Nor-Cal NCB has complied with the probation order requirements, and has had no further violations during this reporting period. OC San will continue to evaluate Nor-Cal NCB's discharge and compliance status on a quarterly basis.

O.C. Waste & Recycling (Permit No. 1-141018)

O.C. Waste & Recycling (OCW&R) discharges condensate generated from the Coyote Canyon Landfill gas collection system, spring water collected in French drains onsite, and extracted groundwater from the remediation efforts at the inactive landfill site. The site has a batch treatment tank equipped with a manual pH adjustment system utilizing sodium hydroxide to adjust the pH of the gas condensate as needed. Bleach (Purechlor) is also added to the gas condensate to control odor.

July 1 – December 31, 2020

In October 2020, OC San required OCW&R to conduct sampling and analysis for the groundwater discharged at the Coyote Canyon Landfill and submit the results of the sampling to OC San. This analysis consisted of the Per- and Polyfluoroalkyl Substances (PFAS) as listed in the US EPA's wastewater analytical method (EPA 537.1). On November 9, 2020, OCW&R submitted the results of the PFAS sampling. The analysis showed a concentration of 70 parts per trillion (ppt) for Perfluorooctanoic acid (PFOA) and 18 ppt for Perfluorooctanesulfonic (PFOS). This combined total concentration of PFOA and PFOS (88 ppt) was higher than OC San's current concentration threshold of 40 ppt for acceptable discharge.

January 1 – June 30, 2021

On February 2, 2021, OC San issued a compliance requirement letter to OCW&R to develop a proposal to treat the PFOA and PFOS in the groundwater source to the 40 ppt threshold or lower (combined PFOA and PFOS). On March 15, 2021, OCW&R submitted a proposal that included installation of granulated activated carbon (GAC) units to treat PFAS in the water. Additionally, OCW&R submitted analytical results validating the effectiveness of the system from a pilot study conducted on site. OC San accepted the proposal and directed OCW&R to install the pretreatment system. On May 18, 2021, OCW&R notified OC San of the completion of pretreatment system installation on site. A new SPDP will be issued to OCW&R for this groundwater discharge in the next reporting period.

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

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

July 1 – December 31, 2020

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

OC San will issue an NOV for the October 2020 cadmium monthly limit exceedance and conduct enforcement during the next reporting period.

January 1 – June 30, 2021

On January 7, 2021, OC San issued an NOV for Omni's October 2020 cadmium monthly limit exceedance. Omni was informed of the need to target monthly average limits versus daily discharge limits to ensure long-term compliance.

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

Pacific Western Container (Permit No. 1-511371)

Pacific Western Container (PWC) designs and manufactures printed corrugated containers and displays. PWC produces custom cardboard containers to customer specifications by printing, die cutting, & gluing raw corrugated board material. Pacific Western Container utilizes five printing/cutting/folding machines, which uses water-based inks to print pre-designed graphics to the cardboard. Wastewater is generated from printing press cleaning operations as well as miscellaneous shop cleanup & associated rinses.

January 1 – June 30, 2021

On May 13, 2021, PWC had a molybdenum violation, for which an NOV was issued on June 3, 2021. OC San conducted 30-day resampling and inspection activities on June 18, 2021, for which the results were compliant with the molybdenum discharge limits. A review of the safety data sheets for the inks and other materials used at the facility did not provide a direct cause for the molybdenum violation. PWC will coordinate with their chemical supplier and determine if any product used in their process contains any molybdenum.

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

Paws & Claws Aquamation and Memorials (Permit No. C-600240)

Paws & Claws Aquamation and Memorials (Paws) provides chemical cremation of animals, typically deceased pets brought in by outside customers. Deceased animals are placed inside of a stainless steel tank, approximately 150 gallons in volume. High strength potassium and sodium hydroxide are added with water, then heated for up to 24 hours to dissolve the organic material. After cool down, the material is pH adjusted using carbon dioxide and discharged to the sewer system.

July 1, 2020 – December 31, 2020

Paws Certification to Discharge No. C-600240 was set to expire December 31, 2020 and OC San had determined that all chemical cremation facilities required a Class I Industrial Wastewater Discharge Permit. Paws submitted a Class I Industrial Wastewater Permit application but refused to provide the payment fee for the application. Paws stated that the wastewater from the cremation process would be exported as fertilizer using a fertilizer product license from the California Department of Food and Agriculture (CDFA). As such, Paws no longer needed a permit to discharge wastewater. On December 14, 2020, OC San issued a compliance requirement letter informing Paws that Certificate No. C-600240 would expire on December 31, 2020, and that Paws was expected to cease all industrial wastewater discharge to the sewer.

January 1 – June 30, 2021

In an email on January 3, 2021, Paws inquired about the issuance of a Class I Industrial Wastewater Permit. On January 12, 2021, OC San issued a compliance requirement letter in response, explaining that a permit was required because Paws has a reasonable potential to adversely affect OC San's operation or for violating any pretreatment standard or requirement. During an inspection on February 22, 2021, Paws stated that wastewater was being exported from the facility to users as fertilizer, but would not provide any records to confirm this information. In addition, OC San noted the open floor drain that was previously used as the discharge point for process operation wastewater at this facility. On March 8, 2021, OC San issued a compliance requirement letter requiring Paws to permanently seal the floor drain and provide records to OC San from the export of wastewater as fertilizer (CDFA tonnage reports). Paws refused to seal the floor drain and provide records to OC San related to the disposal of wastewater at the facility. During a compliance inspection on May 13, 2021, Paws denied OC San access to the facility and refused to provide records, but confirmed that the floor drain had not been sealed. On June 3, 2021, OC San issued a compliance requirement letter, requiring Paws to permanently seal the floor drain immediately.

OC San will continue enforcement during the next reporting period and continue to monitor Paws' discharge and compliance status on an ongoing basis.

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On February 11, 2021, OC San issued an NOV to Performance Powder for the zinc monthly average violation from October 2020. On May 12, 2021, Performance Powder conducted self-monitoring which yielded a zinc violation. Performance Powder reported the violation to OC San on June 30, 2021, for which NOVs will be issued for the daily limit violation as well as the May 2021 monthly limit violation in the next reporting period. On May 27, 2021, Performance Powder had a zinc violation for which an NOV was issued on June 17, 2021.

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

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

Pioneer Circuits, Inc. (Pioneer) is a full service shop offering design, manufacturing, and assembly for aerospace, industrial, and military/defense applications. The manufacturing of a multilayer board generally proceeds by cutting the copper clad materials, photoresist application, inner-layer circuit imaging, resist developing, cupric chloride etching, and alkaline resist stripping. This is followed by surface prep (Cobra Bond), lamination, and drilling. The holes are cleaned by either permanganate or plasma etching, and made conductive through electroless copper plating. Outer-layer circuit development is conducted by pattern plate process steps including photoresist application, circuit imaging, resist developing, copper plating, tin/lead resist plating, ammonium etching, and solder stripping. Solder mask application and surface finishing such as hot air leveling or fuse-oil reflow complete Pioneers' wet process operations. The wastewater discharge at Pioneer is generated by aqueous fume scrubbing, boiler blowdown, R.O. reject, various spent process solutions, and the associated rinse wastestreams.

January 1 – June 30, 2021

In March of 2021, Pioneer exceeded the monthly average discharge limit for lead. An NOV will be issued during the next reporting period.

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

Platinum Surface Coating, Inc. (Permit No. 1-521852)

Platinum Surface Coating, Inc. (Platinum Surface Coating) performs copper, nickel, and chrome electroplating of aluminum and steel automotive wheels provided by outside customers. Wastewater generated from rinse tanks is segregated by constituent composition for batch treatment. Cyanide and chrome-bearing rinses are treated separately prior to convergence with remaining wastewater for metals precipitation and pH management. Following precipitation, wastewater is pumped through a filter press to a holding tank then discharged through two carbon and sand filters then to the sewer. Filter cake and spent process tank solutions are waste-hauled.

January 1 – June 30, 2021

In May 2021, Platinum Surface Coating had a nickel monthly average discharge limit violation, for which an NOV will be issued next reporting period.

OC San will continue enforcement actions during the next reporting period and monitor Platinum Surface Coating's discharge and compliance status.

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

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

In June 2020, Powdercoat had a pH violation.

July 1 – December 31, 2020

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

Powdercoat had no further violations during this reporting period.

January 1 – June 30, 2021

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

Powdercoat Services, LLC (Bldg J / Plant 3) (Permit No. 1-600168)

Powdercoat Services, LLC (Powdercoat) performs surface prewash and conversion coating of aluminum and steel parts, prior to powder coat application per customer specifications. The facility utilizes a three-stage phosphate wash line that is automated with an overhead conveyor track. The process and rinse chambers are set up as recirculating spray. Powdercoat recycles the majority of wastewater generated and waste-hauls the spent phosphate wash solution, with occasional discharges rinse water from the final two stages. Once the tank is ready for discharge, Powdercoat performs manual pH neutralization prior to discharging the wastewater.

January 1 – June 30, 2021

On June 23, 2021, Powdercoat had a zinc violation, for which NOVs will be issued for the daily limit as well as the monthly limit violation during the next reporting period.

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

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

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

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

July 1 – December 31, 2020

On September 3, 2020, OC San issued an NOV for the June 2020 copper monthly limit exceedance. On September 22, 2020, Q-flex had a silver violation, for which an NOV was issued on October 8, 2020. This daily limit exceedance also resulted in a silver monthly average discharge limit violation, for which an NOV

was issued on December 3, 2020. Q-Flex had reduced the usage of the silver-producing artwork and film developers, due to the installation of a laser direct imaging machine which does not generate any wastewater. When the artwork and film developers were used for the first time since the addition of the laser direct imaging machine, the rinse chamber wastestream from the developer (which is typically waste-hauled), had generated a buildup of silver and was released to the batch treatment system. As a corrective action, Q-Flex increased their routine cleaning and maintenance of the artwork developer.

January 1 – June 30, 2021

In March 2021, Q-Flex had a copper monthly average discharge limit violation for which an NOV will be issued during the next reporting period.

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

QAF-North had no compliance issues during this reporting period and continue to waste-haul concentrated waste. QAF-North has indicated that they will pursue alternative treatment options after developing an acceptable waste plan for the south facility.

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

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

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

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

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

July 1 – December 31, 2020

On August 14, 2020, QAF-South had a pH violation, for which an NOV was issued on August 27, 2020. QAF-South responded with corrective actions, which included periodic pH monitoring, operator training, and sample point clean-outs; however, a cause for the violation was not determined. During an inspection, OC San noted QAF-South's practice of routing concentrated wastes through the continuous treatment system, which may have overwhelmed the automatic pH adjustment system. As a result, on October 8, 2020, OC San issued a compliance requirement letter requiring QAF-South to submit a proposal for the management of concentrated waste and installation of a pH chart recorder and automatic shutoff valve to prevent pH non-compliant discharges. QAF-South determined to waste-haul concentrated waste while developing the proposal and has been given an extension to respond in the next reporting period.

January 1 – June 30, 2021

OC San granted an extension to QAF-South for the requirements issued in the letter from October 2020. During a compliance inspection on February 18, 2021, OC San noted that the pH at the sample point was inconsistent with the pH control set point for the treatment system and that QAF-South was generally unaware of the maintenance and operation of the treatment area. OC San reminded QAF-South that the continuous treatment system is not designed to effectively treat concentrated waste and QAF-South confirmed that concentrated waste was being wastehailed. After multiple revisions and comments from OC San, QAF-South submitted a proposal for the pH chart recorder and automatic shutoff valve that was accepted by OC San on March 17, 2021, with a new completion date of April 15, 2021. During a permit renewal inspection on April 16, 2021, OC San noted that the installation of the pH data logger and pH diversion valve was not complete and that changes had been made to the accepted proposal which created a potential bypass of the treatment system. On May 12, 2021, OC San issued a compliance requirement letter, requiring QAF-South to submit a revised proposal for the pH chart recorder and pH automatic shutoff valve to OC San by May 24, 2021 and complete implementation of the accepted proposal by June 15, 2021. QAF-South submitted a revised proposal on June 9, 2021, to which OC San will provide acceptance in a letter issued during the next reporting period.

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

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

Since Rainbow-A's permit was voided in August 2020 and the facility sealed the connection to the sewer, Rainbow-A had no violations during this reporting period.

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

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

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

July 1 – December 31, 2020

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

January 1 – June 30, 2021

Since Rainbow-F's permit was voided in October 2020 and the facility sealed the connection to the sewer, Rainbow-F had no violations during this reporting period.

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

On January 19, 2021, OC San issued a compliance requirement letter summarizing the compliance meeting from December 2020. On May 12, 2021, OC San issued a compliance requirement letter requiring Republic SoCal to submit a proposal for a pretreatment system to ensure long term compliance with discharge limits to OC San by June 15, 2021, and complete installation by July 31, 2021. In addition, the letter also required that Republic SoCal submit documentation to OC San by June 15, 2021, that demonstrates routine pH monitoring and clarifier cleanout/maintenance.

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

Robinson Pharma, Inc. (Croddy) (Permit No. 1-511413)

Robinson Pharma, Inc. (Croddy) is a pharmaceutical manufacturer dedicated to softgel capsule and liquid supplements manufacturing. This facility specializes in athletic supplements which must be free of banned substances and cannot be cross-contaminated with ingredients that may be present at other permitted Robinson Pharma, Inc. facilities. The softgel production uses three continuous dry encapsulation lines and two gelatin melters. Prior to reaching the encapsulation stage, raw materials (liquids and/or 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 the encapsulation lines.

Wastewater is generated from two washrooms and clean-in-place drains used for washing machines, equipment, various size tanks (gelatin melters), and miscellaneous cleaning utensils. Prior to any item being washed, it is cleaned via mechanical means in order to remove all solid debris and powder if present. Sinks are also used for washing small tools. Wastewater is also generated from the facilities reverse osmosis system.

January 1 – June 30, 2021

OC San conducted a permit renewal inspection on March 4, 2021. During the inspection, OC San observed that two outdoor, uncovered drains located in the northwest portion of the facility (in the area of the designated sample point) were susceptible to stormwater intrusion. Robinson Pharma was reminded of OC San's prohibition on stormwater.

On March 25, 2021, OC San issued a compliance requirement letter summarizing the inspection and stormwater prohibition, and requested a corrective action proposal to mitigate the discharge of stormwater to the sewer by April 30, 2021.

On April 5, 2021, OC San received updated facility plans and confirmation photographs from Robinson Pharma that the two outdoor drains were removed from the sewer piping and/or bermed.

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

Santana Services (Permit No. 1-021016)

Santana Services is a small job shop which services a variety of industries. Current work includes the production of hitch covers, oil coolers, and computer chassis. To prepare the parts, they are typically cleaned with a heated caustic cleaner then rinsed in a three stage counterflow rinse. The surface is then neutralized by dipping the parts in a deox solution, followed by two rinses. The final step is a nitric dip which is followed by two heated city water rinses. All rinses from these processes 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 pumped to the batch discharge tank along with the rinse waters. The deox and nitric solutions are changed out approximately every four to six weeks, while the heated caustic etch is discharged more infrequently. The pH is adjusted, if necessary, prior to discharge to the sewer.

January 1 – June 30, 2021

On May 10, 2021, OC San issued an order to cease noncompliance to Santana Services for reporting violations.

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

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

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

July 1 – December 31, 2020

During a routine inspection and sampling on September 8, 2020, OC San noted that the sampling device had been tampered with and that Scientific Spray did not have records or manifests for waste-hauling of its spent phosphate solution. Additionally, OC San noted visible external discharge to the sample point including surface runoff and various solid debris from surrounding open area. As a result, on September 29, 2020, OC San issued an order to cease noncompliant discharges and required Scientific Spray to attend a compliance meeting. On October 14, 2020, OC San held the compliance meeting with Scientific Spray to discuss the company's noncompliance issues. On October 22, 2020, OC San conducted a compliance inspection. On October 30, 2020, OC San issued a compliance requirement letter requiring installation of a hard-plumbed representative sample point, preventing unauthorized discharge of surface runoff.

January 1 – June 30, 2021

On February 1, 2021, OC San issued a compliance requirement letter to accept Scientific Spray's proposal to install a permanent industrial-grade composite sample box that would be hard-plumbed with a capped clean-out installed along the final vertical leg of the piping entering the sewer. Scientific Spray also informed OC San that they would install drainpipes to release stormwater to the storm drain adjacent to the property and regrade the area in the vicinity of the sample box to direct stormwater and runoffs to the adjacent storm drain. On March 2, 2021, OC San conducted a compliance inspection and verified that the proposed sample box was installed and that the area around the sample box had been regraded.

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

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

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

July 1 – December 31, 2020

Following review of the pH monitoring system proposal submitted by Simply Fresh, OC San accepted the proposal on August 28, 2020. The pH monitoring system installation was completed on October 5, 2020. On October 26, 2020, OC San conducted a compliance inspection and confirmed the pH monitoring system installation.

OC San performed a review of the pH monitoring system and historical pH data during a permit renewal inspection on December 14, 2020. Review of the historical pH data revealed that pH was out of compliance, which would therefore require Simply Fresh to install a pH adjustment system to maintain compliance during all hours of discharge.

January 1 – June 30, 2021

On March 11, 2021, OC San issued a compliance requirement letter describing the events from the previous reporting period on December 14, 2020. Since Simply Fresh shares the building with another facility and an accurate representation of the wastewater volume discharged is difficult to determine; therefore, OC San required the installation of a process meter to accurately determine wastewater flow and for Simply Fresh to determine the appropriate size pH adjustment system to propose. On May 15, 2021, the installation of the process meter was completed.

On May 24, 2021, Simply Fresh submitted a pH adjustment system proposal; however, it was noted that the sizing of various tanks and adjustment equipment may change based on wastewater discharge volumes determined by the newly installed process meter. Simply Fresh will collect and submit process meter readings to OC San on a regular basis to determine an accurate wastewater discharge volume.

OC San will review the process meter flow data and pH adjustment system proposal during the next reporting period, and continue to monitor Simply Fresh's discharge and compliance status on a quarterly basis.

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

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

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

January 1 – June 30, 2021

Soldermask had a nickel violation on April 13, 2021, for which an NOV was issued on April 29, 2021. During a compliance inspection on May 6, 2021, and as provided in a corrective action letter, Soldermask informed OC San that the violation resulted from the discharge of floor waste to the clarifier that had elevated concentration of nickel and that staff had been retrained to prevent the occurrence in the going forward. In addition, OC San noted the discharge of single pass cooling water to the sewer which is prohibited by OC San's Ordinance. On June 2, 2021, OC San issued a compliance requirement letter, requiring Soldermask to immediately cease the discharge of single pass cooling water to the sewer, submit a proposal for the handling and disposal of single pass cooling water to OC San by June 30, 2021, and implement the accepted proposal by July 31, 2021. Soldermask submitted a proposal on June 21, 2021, to which OC San will respond during the next reporting period.

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

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

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

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

July 1 – December 31, 2020

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

South Coast Baking had no further violations during this reporting period.

January 1 – June 30, 2021

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

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

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

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

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

July 1 – December 31, 2020

On August 6, 2020, OC San issued an NOV for the May 2020 silver monthly limit exceedance. SCC could not determine the cause of the slightly elevated silver concentration through review of production records.

SCC (BLDG 3500 A) had no further violations during this reporting period.

January 1 – June 30, 2021

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

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

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

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

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

July 1 – December 31, 2020

On August 20, 2020, OC San issued an NOV for the May 2020 copper and cadmium monthly limit exceedances. On September 23, 2020, OC San held a compliance meeting with Cherry to discuss the

scope and completion date of the requirement to mitigate stormwater and surface runoff discharge to the sewer. During the meeting, Cherry explained that according to their contractor's assessment, the project completion date could not be fully determined until Cherry had finalized engineering design and construction drawings for review and approval by the City of Santa Ana's Building Department, specifically related to electrical and/or plumbing requirements.

On October 15, 2020, OC San issued a compliance requirement letter, in which OC San granted an extension for the proposal submittal and project completion but requested submittal of an interim proposal until a long-term solution could be implemented. Cherry submitted the interim proposal on October 29, 2020. On November 6, 2020, Cherry had a cadmium violation, for which an NOV was issued on November 24, 2020. On December 17, 2020, Cherry reported that the company had successfully implemented all proposed interim solutions concerning stormwater and runoff mitigation. On December 23, 2020, Cherry had a cadmium violation for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2021

On January 28, 2021, OC San issued an NOV for the cadmium violation that occurred in December 2020. On February 8, 2021, OC San conducted a compliance inspection at Cherry to investigate the root cause of the cadmium violation and to evaluate the recently implemented solutions to eliminate stormwater discharges to the sewer.

On March 29, 2021, OC San issued a compliance requirement letter requiring Cherry to: 1) submit a corrective action report documenting the root cause of the cadmium violation and the long-term solution to correct the issue, 2) resume the operation of the cadmium removing ion exchange system to adequately treat wastewater prior to discharge to the sewer, and 3) submit updated facility drawings that accurately depict the wastewater treatment process at the facility.

On April 14, 2021, Cherry submitted a corrective action report and attributed the cadmium violation to faulty analytical results from the mass spectrometry analytical instrument, which has been in use for more than seven years and has reached the end of its life cycle. Cherry utilizes analytical results from this instrument to confirm the treatment system is operating correctly. However, in this instance, the facility reported that the incorrect cadmium analytical misguded the operators of the pretreatment facilities as they monitored concentrations from the lamella clarifier effluent. This led to the discharge of wastewater with higher-than-expected levels of cadmium. Since then, a new mass spectrometer has been installed and calibrated at Cherry. The cadmium ion exchange was back in service early March 2021.

Cherry had installed canopies over all open pretreatment tanks and the lamella clarifier, and any stormwater that enters the outdoor secondary containment trench is pumped directly to the storm drain. On June 30, 2021, Cherry submitted updated facility drawings that accurately depict current wastewater treatment operations at the facility.

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

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

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

In February and March 2019, Star had oil & grease violations. In March 2019, OC San conducted a compliance inspection to determine if Star had made any improvements to its existing treatment system. Star personnel stated that they were continuing to research various technologies to ensure long term compliance with their permit limits and requirements. Star was aware that the use of bag filters was inadequate as primary treatment to remove oil and grease. In April 2019, OC San issued a compliance

requirement letter requiring the submittal of a waste management proposal by May 2019, and installation of the proposed pretreatment system by June 2019 after acceptance by OC San. While Star met the deadline for submitting the proposal, they installed the system without prior acceptance from OC San. Star installed a zeolite multimedia filter tank equipped with a control valve that accommodates a backwash cycle to remove accumulated contaminants from the zeolite. However, the effectiveness of the backwash cycle using untreated gravity-fed water was unclear. In June 2019, Star had another oil & grease violation.

In July 2019, OC San conducted a compliance inspection and resampling during which OC San noted that Star had not made any further improvements to the treatment system using the zeolite filter media and lacked understanding of an appropriate preventative maintenance schedule to maintain compliance. The resampling detected an oil & grease violation. In August 2019, OC San issued a compliance requirement letter directing Star to attend a compliance meeting, which was held in September 2019, to discuss implementation of corrective actions to develop and maintain an effective treatment system. Following the compliance meeting, OC San issued another compliance requirement letter requiring Star to complete the installation of the proposed treatment system by October 2019. Star had since completed installation of the treatment system, improved the operation of the zeolite filter tanks, and added a treated wastewater holding tank. In October 2019, Star was published as significantly non-compliant for the FY2018-2019 reporting period due to chronic and acute oil & grease of mineral or petroleum discharge violations during that fiscal year.

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

July 1 – December 31, 2020

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

OC San will continue investigation and enforcement during the next reporting period.

January 1 – June 30, 2021

Based on sample results, Star determined that the original laboratory they employed had provided non-detect or otherwise compliant oil and grease results that were erroneous. Star chose a different laboratory and has since submitted results that are consistent with samples taken by OC San. During a routine inspection on January 5, 2021, OC San noted that the wash pit remained open during a recent storm, allowing for the collection and discharge of stormwater to the sewer. On February 26, 2021, OC San issued a compliance requirement letter, requiring Star to submit a proposal to cease the discharge of stormwater to the sewer to OC San by March 31, 2021, and implement the accepted proposal by April 30, 2021. Star requested and was granted an extension to mitigate the stormwater issue, requiring Star to submit the proposal by April 30, 2021, and implement the proposal by June 30, 2021. Star submitted a proposal on April 30, 2021, which OC San accepted on June 1, 2021. On April 29, 2021, Star had an oil and grease

violation for which an NOV was issued on May 20, 2021. On June 3, 2021, OC San issued a compliance requirement letter as a result of the oil and grease violations, requiring Star to submit a proposal for a new or modified pretreatment system to OC San by June 30, 2021, and implement the accepted proposal by August 31, 2021.

OC San will continue enforcement during the next reporting period and continue to monitor Star'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.

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

January 1 – June 30, 2021

During a routine inspection on May 7, 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. On June 16, 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 will continue enforcement actions to address this issue in the next reporting period and will continue to monitor Stepan's discharge and compliance status.

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

Stremick's Heritage Foods, LLC (Stremick's) produces milk and water-based beverages and milk-based products. Products include homogenized whole milk, 2%, 1%, nonfat, cream, half-and-half, chocolate and other flavored drinks, almond milk, soy milk, rice milk, almond and coconut creamer, various flavors of nectar, and soft serve ice-cream mixes. Inside the facility production areas, wastewater is generated from the washing of equipment and floors. Stremicks has removed three production lines to add four new production lines that utilize purified water from a reverse osmosis system that also contribute to the wastewater discharge. The wastewater passes through one or two four-stage underground clarifiers (depending on the location in the plant) prior to the sample point. Additional wastewater is generated downstream of the clarifiers from washing the inside of tanker trucks after unloading bulk liquid ingredients and products. The wash pad is located outside in a bermed and roofed area. Other sources of wastewater that discharge through the sample point include boiler blowdown, cooling tower bleed-off, and water softener regeneration waste. The total flow from all industrial wastewater is captured by the open channel meter outside the facility gate.

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

In January 2020, OC San conducted a compliance inspection during which Stremicks reported that equipment, floors, trucks, and piping throughout the facility are washed and cleaned with acids and/or bases to achieve proper disinfection. Stremicks stated that no treatment or equipment is used to achieve compliant pH levels and ensure long term compliance with OC San's pH discharge limits. OC San informed Stremicks that a pretreatment system would be required to maintain compliance with the pH discharge limits. Following the inspection, OC San issued a compliance inspection Summary and Requirements

Letter requiring Stremicks to submit a proposal for an automatically controlled pH adjustment system by February 29, 2020, with an installation date, following OC San's review and acceptance, of no later than May 31, 2020.

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

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

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

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

July 1 – December 31, 2020

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

plans to submit the proposal to OC San in the following reporting period upon finalization with its' consultants.

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

January 1 – June 30, 2021

On February 22 and 23, 2021, OC San conducted routine inspection and sampling activities at Stremicks. OC San confirmed the modifications to the interim pretreatment system, and Stremicks noted they are actively working with their consultants to generate a proposal for the final pH diversion prior to the sample point.

On March 31, 2021, OC San received a draft proposal for the final pH diversion system, however several aspects of the proposal such as location and sizing were still being designed by the consultant. In addition, Stremicks had begun the process of obtaining permits from the City of Santa Ana in order to perform the construction activities required for this system installation. Stremicks continues to submit monthly pH monitoring data collected from the designated sample point for review.

OC San will review the final and complete pH adjustment system proposal during the next reporting period, and will continue to monitor Stremicks' discharge and compliance status on a quarterly basis.

Superior Plating (Permit No. 1-021090)

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

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

In July 2019, OC San issued a probation order requiring Superior to conduct a proper evaluation of its pretreatment system and to make any necessary improvements to achieve consistent compliance by September 2019. In August 2019, OC San conducted a compliance inspection and noted that Superior had made adequate progress in complying with their probation order requirements. The company also submitted all required self-monitoring & biweekly reports in a timely manner. However, Superior had a daily and a monthly cyanide (total) violation in August 2019. In September 2019, OC San conducted another compliance inspection to verify compliance with the probation order and inquire about the cause of the cyanide violation. Superior's efforts to improve compliance included installation of new measurement equipment (ORP & pH measurement, new pumps & piping), training for treatment operators in the use of new bench test kits for metals & improved control equipment, and an updated pretreatment system schematic and an updated operations & maintenance manual. On October 2019, OC San conducted a follow-up inspection and resampling and found that Superior's consultant had evaluated the cyanide destruct system and concluded that the control equipment (pH & ORP) was faulty and needed replacement. The pH and ORP controller had already been completed by the time of the inspection. The resampling results showed compliance.

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

July 1 – December 31, 2020

On July 23, 2020, OC San issued NOVs for the February and April 2020 cyanide monthly limit exceedances. In the month of August 2020, Superior Plating had another cyanide (total) monthly violation, for which an NOV was issued on November 19, 2020.

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

January 1 – June 30, 2021

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

Superior Processing (Permit No. 1-021403)

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

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

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

all cyanide-bearing wastewater offsite on a weekly or biweekly basis, not only to maintain compliance but also to recover gold present in the wastestream.

July 1 – December 31, 2020

On July 2, 2020, OC San issued an NOV for the April 2020 nickel monthly limit exceedance. On July 14, 2020, OC San conducted a compliance inspection to review inconsistencies between drawings submitted in 2019 and drawings submitted in 2020 to OC San. The inspection was also intended to review how waste streams have been transferred and discuss proper waste stream segregation. OC San noted that the rinses from the electroless nickel-immersion gold process were being sent to the IX System and not completely segregated with other cyanide wastes for waste-hauling. Superior Processing reported that these streams have very low cyanide and nickel concentrations. OC San requested a wastewater characterization to verify the concentration of all pollutants of concern. At the time of the inspection, Superior had addressed the majority of the drawing inconsistencies. On December 30, 2020, OC San revised Superior Processing's permit to increase the frequency of self-monitoring requirements for Nickel from quarterly to monthly, as a result of the nickel violations.

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

January 1 – June 30, 2021

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

Tiodize Company, Inc. (Permit No. 1-111132)

Tiodize is a medium size job shop providing finishing services for aerospace, commercial, medical, and military/defense applications. The processing of a typical part may begin by masking areas of the part that do not require finishing or painting. The processing of a part through the wet surface finishing generally proceeds by alkaline cleaning, rinsing, surface finishing (anodizing, chemical etching, conversion coating, color dyeing), rinsing, and drying. Wet operations are conducted manually by basket, hoist, and rack process techniques. The processing of a part through the painting operation typically proceeds by alkaline and/or solvent cleaning, organic coating, and curing. Mask removal, if applicable, is accomplished by solvent soaking and manual wiping. The effluent discharge at Tiodize is generated by the various rinse wastestreams from process operations.

January 1 – June 30, 2021

During a compliance inspection on April 16, 2021, OC San noted that Tiodize has multiple rinses running without processing parts through those rinses. OC San notified Tiodize that this practice is considered dilution and is prohibited by OC San's Ordinance. On May 12, 2021, OC San issued a compliance requirement letter, requiring Tiodize to immediately cease the practice of running rinses without parts being processed and to develop a proposal to implement effective flow control through the rinse tanks to minimize water usage by June 15, 2021, and implement the accepted proposal by July 31, 2021. On May 21, 2021, Tiodize provided a response to the compliance requirement letter, claiming that the practice of running rinses without parts being processed is not dilution and requesting a meeting with OC San. OC San issued a compliance requirement letter on June 3, 2021, requiring Tiodize to attend a compliance meeting. During the compliance meeting on June 15, 2021, it was noted that OC San's assessment that Tiodize is in violation of the prohibition on dilution is consistent with US EPA regulations and previous administrative orders. Tiodize noted adding additional instrumentation to control water flow and confirmed city water flows to 5 running rinse tanks. As discussed in the meeting, OC San issued another compliance requirement letter on June 22, 2021, requiring Tiodize to immediately cease the practice of running rinses without parts being processed and to develop a proposal to implement effective flow control through the rinse tanks to minimize water usage by July 15, 2021, and implement the accepted proposal by August 15, 2021.

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

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

In July 2019, OC San conducted a compliance inspection to investigate the copper violation. During the inspection, TTM stated that their review of their ion exchange regeneration schedule indicated that the final 'scavenger' stage required more frequent regeneration, which by that time had already been implemented.

July 1 – December 31, 2020

On December 3, 2020, TTM Technologies had copper daily and mass limit violations which also resulted in a monthly limit violation, for which an NOV was issued on December 17, 2020.

January 1 – June 30, 2021

TTM Technologies attributed the cause of the violation to a pump failure in their develop-etch-strip cupric chamber, allowing overflows into their rinse tank which eventually overloaded their scavenger unit, thus allowing pass-through. TTM Technologies had implemented several corrective actions which include 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. On March 4, 2021, OC San issued an NOV for the December 2020 copper monthly limit exceedance. TTM Technologies had no further violations during this reporting period.

OC San will continue to monitor TTM'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.

July 1 – December 31, 2020

During routine inspections on September 21 and September 23, and a compliance inspection on October 8, 2020, OC San noted potential stormwater and surface runoff discharge to the sample point in addition to the oily waste and various types of solid debris entering the outside drain in the pretreatment area. On October 20, 2020, OC San issued an order to cease noncompliant discharges requiring Vi-Cal to attend a compliance meeting. On November 5, 2020, OC San held the compliance meeting to discuss Vi-Cal's

multiple noncompliance issues, including failure to submit self-monitoring reports. On December 1, 2020, OC San issued a compliance requirement letter requiring Vi-Cal to (1) submit plans to mitigate stormwater and surface runoff discharge to the sewer, (2) remove bypass piping, flexible hosing and inoperable treatment components from the pretreatment area, (3) submit manifests for previous wastehauling of oily waste and spent coolants, (4) submit plans to treat oily wastes onsite, and (5) use an approved US EPA method for non-polar oil & grease analysis.

January 1 – June 30, 2021

Vi-Cal submitted a proposal to use part of their existing pretreatment system to treat process water. OC San rejected this proposal as the proposal did not provide complete segregation between stormwater and process wastewater and the potential to discharge stormwater into the sewer remained. On February 18, 2021, OC San conducted a compliance inspection during which Vi-Cal stated that they were working on a revision to their proposal. During this inspection, OC San also verified that all piping and flexible hosing had been removed. On March 9, 2021, OC San received the revised proposal, including updated pretreatment process diagrams and layouts, with Vi-Cal's permit renewal application. Vi-Cal proposed a separate batch system consisting of flocculation, coagulation, filtration, and pH adjustment to treat their process wastewater, which was accepted by OC San. OC San required Vi-Cal to complete the installation of their proposed pretreatment system by May 31, 2021 as a condition of their permit renewal. Vi-Cal had completed most of the installation of their pretreatment system by June 1, 2021. Vi-Cal is currently installing a roof cover over the system and a gate to secure the area before they begin discharging.

OC San will follow up with Vi-Cal's pretreatment installation process during the next reporting period and will continue to monitor Vi-Cal'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. Winonics is a full-service PCB shop, starting with inner layer fabrication from copper clad core material purchased from outside vendors, and engineering tooling data supplied by customers. Winonics generates photo, micro drilling, and fabrication tools from the data for use in the manufacturing process. After core material shearing, surface cleaning, and photo resist application in a hot roll lamination process, the layers are photo printed and develop/etch/strip (conveyorized wet process line) then inspected for defects. After inspection, the layers undergo brown oxide treatment for copper surface adhesion promotion, then lamination with prepreg/resin sheets under high temperature / pressure in hydraulic presses to create the outer layer panels. After lamination, the panels are broken apart, sheared to size, and scrubbed, then micro drilled using customer supplied data. After drilling, the panels are processed through electroless copper hole wall coating, then outer layer photo resist lamination, photo print, and develop, followed by electrolytic copper and tin pattern plate. Photoresist is stripped off, then the panels are copper etched through a conveyorized line followed by etch resist (tin plate) strip. After etching and stripping, the panels are cleaned through a Hyoki aluminum oxide jet scrubber, then coated with photo imageable or thermal solder mask per customer specifications. In lieu of traditional hot air solder leveling, Winonics employs new coating technology (ENIG automated coating line) for the finished panels and exposed hole/connector pads with electroless nickel and gold or silver per customer requirements. Approximately 90% of all work orders at Winonics are processed through this line, and the rest are hot air solder leveled. After processing through ENIG or HASL, the panels are legend screened then the individual circuit boards are routed/cut out of the panels, followed by electrical testing, post clean and packaging for shipment to customers.

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. There are four pretreatment vessels set up in series for the continuous treatment - initial pH adjust, aluminum sulphate treatment, sulfide treatment, and a holding/mixing stage with polymer / floc addition, then gravity flow into a large above ground clarifier. Solids are removed from the clarifier daily and transported to a sludge thickening tank via a sludge pump, and then dewatered with a filter press. Batch treatment effluent

is also 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. Process operations are housed in one building.

July 1 – December 31, 2020

Winonics had no violations during this reporting period.

January 1 – June 30, 2021

In March 2021, Winonics had a monthly average copper violation, for which an NOV was issued on June 10, 2021. Winonics submitted their corrective action letter via email but failed to determine the exact cause or source of the exceedance. The company's investigation involved reviewing all the past daily facility inspection logs, daily floor inspection logs, process tanks and pretreatment equipment. Winonics noted that the most likely cause was due to human error. As a corrective action, Winonics stated that they will conduct additional sampling if a monthly violation is detected from a single sample result.

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

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

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

July 1 – December 31, 2020

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

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

January 1 – June 30, 2021

OC San received and reviewed Yakult's interim proposal dated January 26, 2021. Yakult provided a wastewater discharge estimate based on water consumption from the City of Fountain Valley's water bills and Yakult production data. The wastewater discharges discussed in the proposal include cooling tower blowdown, boiler blowdown, and reverse osmosis concentrate and condensate from cooling and refrigeration. The proposed methodology to report monthly wastewater discharges to OC San in the interim was acceptable while Yakult is working on the completion of the effluent flowmeter installation.

On March 3, 2021, OC San issued a compliance requirement letter requiring Yakult to: (1) complete installation of the effluent flowmeter by June 30, 2021, and (2) submit a calibration report and a certification of calibration check to OC San by July 15, 2021. However, on June 21, 2021, Yakult requested a deadline extension to complete this project due to delays in budget approval and contractors bidding. OC San

granted the extension and the effluent flowmeter is scheduled to be installed on August 30, 2021, followed by field work and calibration completion to ensure the flowmeter is performing as specified by September 24, 2021.

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

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 2020/21 consists of one manager, three supervisors, nine engineers, four environmental specialists, 10 field inspectors, three field technicians, and seven administrative support personnel for a total of 37 staff members.

5.2.2 Revenues

During FY 2020/21 a total of \$17,870,747 in revenue payments were made to OC San by Class I, Class II, Wastehauler, Special Purpose and FOG permittees. The following amounts were collected for the discharge of wastewater, biochemical oxygen demand pollutants, and suspended solid pollutants. Operation and maintenance (O&M) fees totaled \$12,633,917.88, Supplemental Capacity Facilities Capacity Charge (SCFCC) fees totaled \$3,754,447, and wastehauler user fees totaled \$935,798.65. Permit fees in the amount of \$546,584 were collected, and over \$74,439 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 2019/20 and an estimate of FY 2020/21.

The revenue collected offsets a portion of OC San's treatment costs and the \$6,630,445 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 decreased 7.9% over the preceding year and show a 2.18% increase from the program costs of five years ago. The cost per labor hour over the past five years has increased 2.7%, which is an average of 0.5% per year increase. A comparison of pretreatment program costs for the past five years is shown in Table 5.1.

FY	Total Cost	Labor Hours	Cost per Labor Hour
2016-17	\$6,488,868	69,046	\$93.98
2017-18	\$6,044,009	69,606	\$86.83
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

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.

Table 5.2. Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2020/21 Orange County Sanitation District, Resource Protection Division	
Description	Quantity
Vehicles	12
Equipment	
Cellular phones	13
Laptop computers	13
Composite samplers – general use	43
Composite samplers – special purpose	16
Portable sample pumps	9
pH meters – portable	16
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 2020/21. Values provided in the tables are derived primarily from manifests provided by the wastehauler companies.

6.3.1 Wastehauler Permitting

A liquid waste hauler must first register with the Orange County Health Care Agency (OCHCA) and have all vehicles intended for 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 rules for use of the wastehauler station, with enforcement for violations. Wastehaulers must conduct their business using methods to reduce or eliminate odors. During FY 2020/21, 44 wastehauler companies were under permit with OC San, with a total of 152 vehicles.

6.3.2 Wastehauler Discharges

During the past fiscal year 10.0 million gallons (MG) of waste was discharged by permitted wastehaulers at the OC San Wastehauler Station. The volume of waste accepted at the station was 20.6% lower than the volume received during FY 2019/20. The number of loads received decreased 21.2% from FY 2019/20. As of January 18, 2016, OC San started using a new pretreatment software and database (iPACS), which allows for more accurate tracking and calculation of discharged volumes. The reported volume for FY 2016/17 through FY 2020/21 considers the self-reported volumes, instead of the maximum capacity volumes reported in previous years, which assumed all received tanks were full. Wastehauler discharge data for the last five years is summarized in Table 6.1.

Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2016/17-2020/21 Orange County Sanitation District, Resource Protection Division		
FY	Loads Delivered	Volume Waste Received (MG)
2016-17	8,465	18.1 ¹
2017-18	4,844	12.1 ¹
2018-19	8,127	13.2 ¹
2019-20	8,467	12.6 ¹
2020-21	6,675	10.0
¹ Volume is based on wastehauler self-reported volumes		

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.

Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2020/21 Orange County Sanitation District, Resource Protection Division			
Load Type	Loads Delivered	Waste Received (MG)	% Waste Received
Brine	0	0	0
Cesspool	62	0.11	1.1
Chemical toilet	3,965	5.90	58.7
FSE grease	1,924	3.08	30.6
Septic tank	724	0.97	9.6
Other	0	0	0
All Types Total	6,675	10.0	100

During the past fiscal year 3.08 million gallons of FSE grease was discharged by permitted wastehaulers at OC San's Wastehauler Station. This represents a 33.8% decrease from the volume of grease discharged during FY 2019/20. The five-year trend for grease is presented in Table 6.3.

Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San's Disposal Station, FY 2016/17-2020/21 Orange County Sanitation District, Resource Protection Division		
FY	Loads Delivered	Volume (MG)
2016-17	3,668	9.33
2017-18	3,100	5.80
2018-19	2,939	5.40
2019-20	2,672	4.65
2020-21	1,924	3.08

6.3.3 Wastehauler Monitoring

Random sampling of wastehauler loads is conducted to verify compliance with OC San discharge limits. During FY 2020/21, the contents of 960 wastehauler vehicles (18.9% of all loads received) were sampled

and 5,760 metal analyses were performed. The results of the sampling included 74 metal violations in 960 loads that originated from either domestic sources or grease hauling. This represents a 7.71% violation rate of the total samples taken and analyzed. The violations included one lead, zero cadmium, 31 copper, and 42 zinc concentration exceedances. Some of the actions taken by OC San as a response to these violations included generator verifications and inspections, investigations, notice of violation 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 2020/21, 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)¹.

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 2020/21 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 93.98% of the analyses (406 of 432 analyses) are at or below the heavy metal constituents RL.

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2020/21 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	72	100	0	0.00
Chromium	0.02	72	100	0	0.00
Copper	0.02	72	100	0	0.00
Nickel	0.02	72	100	0	0.00
Lead	0.02	72	100	0	0.00
Zinc	0.02	46	63.89	26	0.00
Summaries		406	93.98	26	0.00

¹ Standard Methods for the Examination of Water and Wastewater 23rd Edition. Part 1020-B, Section 12, Subsection f, entitled "Duplicate sample" (pg. 1-11)

Twenty-six of the zinc samples had results above the RL. Of the results above the RL, all were just slightly above the RL. Zinc is a common contaminant and present in dust; OC San continues to review equipment maintenance and storage procedures to try to minimize this low concentration contamination.

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), 100% of the results were within the acceptable RPD.

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2020/21				
Orange County Sanitation District, Resource Protection Division				
Constituent	Comparisons within acceptable RPD	Comparisons outside acceptable RPD	Percent within acceptable RPD	Average RPD (%)
Cadmium	48	0	100	0
Chromium	48	0	100	2
Copper	48	0	100	6
Nickel	48	0	100	5
Lead	48	0	100	0
Zinc	48	0	100	6
Summaries	48	0	100	3

A review of archive sample handling procedures took place during FY 2016/17, and a new procedure for storing sample archives was implemented on July 1, 2016.

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.

Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2020/21		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	0.53	0.00	0.00	0.00	0.50
	Sampler B	0.00	0.00	0.67	0.00	0.00	0.00	0.00
	Site RPD (%)	0.00	0.00	0.58	0.00	0.00	0.00	26.22
2	Sampler A	0.00	41.89	0.00	0.00	0.00	47.50	3.68
	Sampler B	0.00	0.00	0.00	0.00	0.00	5.92	6.56
	Site RPD (%)	0.00	163.50	0.00	0.00	0.00	16.64	44.81
3	Sampler A	0.00	0.00	2.08	0.00	0.00	0.00	3.80
	Sampler B	0.00	0.00	1.37	0.00	0.00	0.00	1.20
	Site RPD (%)	0.00	0.00	0.13	0.00	0.00	0.00	12.87
4	Sampler A	0.00	0.00	0.00	0.00	0.00	0.06	0.48
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.01	0.00
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	12.68	5.83
Avg	Site RPD	0.00	40.88	0.18	0.00	0.00	7.33	22.43
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. Second quarter chromium, zinc and TSS showed a high RPD between the two samplers collecting from the same site; one sample of the 10 collected from the composite samplers had markedly different results, which suggests a possible contamination of the sample container. 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 2020/21, 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 93.98% of the equipment blank samples have concentrations at or below the heavy metal reporting limits. The remaining 6.06% contained low level zinc contamination slightly above the RL.
- Results of the archive sample evaluation demonstrate that 100% 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.

Table 6.7 Permittees with TTO Waivers July 1, 2020 – June 30, 2021 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, 2020 - Jun 30, 2021
1-021088	A & R Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011138	Accurate Circuit Engineering	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011115	Active Plating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021

Table 6.7 Permitees with TTO Waivers July 1, 2020 – June 30, 2021 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, 2020 - Jun 30, 2021
1-531404	Air Industries Company, A PCC Company (Knott)	Metal Finishing PSNS, Nonferrous Metals Forming and Metal Powders PSNS	Jul 01, 2020 - Jun 30, 2021
1-031110	All Metals Processing of O.C., Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011073	Allied Electronics Services, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011036	Alloy Tech Electropolishing, Inc.	Metal Finishing PSNS	Jan 01, 2021 - Jun 30, 2021
1-021249	American Circuit Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521798	Andres Technical Plating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600295	AnoChem Coatings	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511389	Anodyne, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011155	Anomil Ent. Dba Danco Metal Surfacing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600689	APCT Anaheim	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600503	APCT Orange County	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021192	ARO Service	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-571295	Astech Engineered Products, Inc. (Bldg. 1 & 2)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-071037	Aviation Equipment Processing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521824	Beckman Coulter, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511370	Beo-Mag Plating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021213	Black Oxide Industries, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-111018	Boeing Company (Graham)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600316	Brasstech, Inc	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521770	Burlington Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021062	Cadillac Plating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-111089	Cal-Aurum Industries, Inc.	Metal Finishing PSNS	Jan 01, 2021 - Jun 30, 2021
1-511076	CD Video, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021189	Central Powder Coating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511414	Chromadora, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521821	Circuit Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-111129	Coast to Coast Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600812	Coastline High Performance Coatings, LTD	Metal Finishing PSNS	Jul 01, 2020 - Dec 31, 2020
1-600708	Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021290	Continuous Coating Corporation	Coil Coating PSNS, Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021289	Crest Coating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021297	Custom Enamellers, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021

Table 6.7 Permitees with TTO Waivers July 1, 2020 – June 30, 2021
Orange County Sanitation District, Resource Protection Division

Permit No.	Facility Name	Federal Categories	Waiver Period
1-021379	Data Aire, Inc. #2	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011142	Data Electronic Services, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521761	Data Solder, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-601023	Dunham Metal Plating Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021325	Dunham Metal Processing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011064	EFT Fast Quality Service, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021158	Electro Metal Finishing Corporation	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511376	Electrode Technologies, Inc. dba Reid Metal Finishing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-071162	Electrolurgy, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021336	Electron Plating Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021337	Electronic Precision Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600456	Embee Processing (Anodize)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600457	Embee Processing (Plate)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521855	Excello Circuits Manufacturing Corp.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021121	Fineline Circuits & Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021352	Gomtech Electronics, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021286	Harbor Truck Bodies, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521790	Hi Tech Solder	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021185	Hightower Plating & Manufacturing Co.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-061115	Hixson Metal Finishing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021041	Ideal Anodizing, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521756	Ikon Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031106	Imperial Plating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600243	Integral Aerospace, LLC	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511407	JD Processing, Inc. (East)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021171	Kenlen Specialities, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021428	Kryler Corporation	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600338	Lightning Diversion Systems LLC	Metal Finishing PSNS	Jan 01, 2021 - Jun 30, 2021
1-511361	LM Chrome Corporation	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031049	Logi Graphics, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-111007	M.S. Bellows	Metal Finishing PSNS	Jul 01, 2020 - Dec 31, 2020
1-531391	Magnetic Metals Corporation	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521811	Murrietta Circuits	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521772	Neutronic Stamping and Plating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021

Table 6.7 Permitees with TTO Waivers July 1, 2020 – June 30, 2021 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-571292	Newport Fab, LLC (dba TowerJazz Semiconductor)	Electrical and Electronic Components PSNS	Jul 01, 2020 - Jun 30, 2021
1-521801	Nobel Biocare USA, LLC	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021520	Omni Metal Finishing, Inc.	Metal Finishing PSNS	Jan 01, 2021 - Jun 30, 2021
1-021070	Pacific Image Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521805	Performance Powder, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011262	Pioneer Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521852	Platinum Surface Coating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600167	Powdercoat Services, LLC (Bldg E / Plant 1)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600168	Powdercoat Services, LLC (Bldg J / Plant 3)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011265	Precious Metals Plating Co., Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521809	Precision Anodizing & Plating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011008	Precision Circuits West, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600337	Q-Flex Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011013	RBC Transport Dynamics Corp.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021187	Rigiflex Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-061008	Sanmina Corporation (Airway)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-061009	Sanmina Corporation (Redhill)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021016	Santana Services	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031311	Scientific Spray Finishes, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600297	Shur-Lok Company	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031341	Soldermask, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011069	South Coast Circuits, Inc. (Bldg 3500 A)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011030	South Coast Circuits, Inc. (Bldg 3506 A)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511365	South Coast Circuits, Inc. (Bldg 3512 A)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-011054	South Coast Circuits, Inc. (Bldg 3524 A)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511381	SPS Technologies LLC, DBA Cherry Aerospace	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming and Metal Powders PSNS	Jul 01, 2020 - Jun 30, 2021
1-021672	Stainless Micro-Polish, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Dec 31, 2020
1-531425	Star Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021664	Statek Corporation (Main)	Electrical and Electronic Components PSES, Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021

Table 6.7 Permitees with TTO Waivers July 1, 2020 – June 30, 2021 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-521777	Statek Corporation (Orange Grove)	Electrical and Electronic Components PSNS	Jul 01, 2020 - Jun 30, 2021
1-600012	Summit Interconnect, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-600060	Summit Interconnect, Inc., Orange Division	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021090	Superior Plating	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021403	Superior Processing	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031012	Tayco Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021123	Taylor-Dunn Manufacturing Company	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021282	Thermal-Vac Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-531415	Timken Bearing Inspection, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Dec 31, 2020
1-111132	Tiodize Company, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021202	Transline Technology, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-141163	Tropitone Furniture Co., Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521859	TTM Technologies North America, LLC. (Coronado)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511366	TTM Technologies North America, LLC. (Croddy)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-511359	TTM Technologies North America, LLC. (Harbor)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-521836	Universal Molding Co.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-031035	Winonics (Brea)	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021
1-021735	Winonics, Inc.	Metal Finishing PSNS	Jul 01, 2020 - Jun 30, 2021

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 discharge point exists other than the sewer system and/or considered alternate discharge methods pose an environmental impact or threat.

Wastewater discharges may include: 1) temporary facilities and projects such as groundwater cleanup and construction dewatering, 2) short-term or one-time water and wastewater discharges, 3) surface run-off from areas associated with an industrial or commercial facility.

6.7.1 SPDP Metrics and Trends

During FY 2020/21, 14 new SPDPs were issued, of which one expired and five were later voided; of the active SPDPs, three existing SPDPs were voided before expiration at the request of the permittees, and two SPDPs were not renewed by the permittee upon expiration. During the fiscal year, there were 56 active SPDPs, a decrease from the previous fiscal year, but with only 45 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 2020/21 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 2020/21, 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 quarterly, or semi-annually 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.

6.10 Significant Changes in Operating the Pretreatment Program

There were no significant changes to the OC San Pretreatment Program during FY 2020/21.

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 2020/21, section 7.3 presents information on IRWD for FY 2020/21, and section 7.4 presents information on SAWPA for FY 2020/21.

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 County² 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.

For this fiscal year, 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 OCSD and other agencies. The northern and coastal parts of IRWD are served by OCSD. The pretreatment program in these sections is managed by OCSD. 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 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 Orange County Sanitation Revenue Zone No. 14, which collects sewage for treatment at either IRWD's Michelson Water Recycling Plant (MWRP) or OCSD's Reclamation Plant No. 1. Currently, most of the sewage generated within 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. The MWRP biosolids handling plant is currently in the commissioning phase. Approximately 14% of MWRP biosolids in fiscal year 20/21 was

² 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.

treated and recycled at the MWRP biosolids handling plant, and the balance pumped to an OCSD sewer for treatment and recycling.

7.3.1 IRWD Operating Permit, Regional Board Order R8-2015-0024

On June 19, 2015, the Santa Ana Regional Water Quality Control Board adopted Order No. R8-2015-0024, superseding Order No. R8-2007-0003. 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. Sludge monitoring is not one of the requirements of the Order.

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 OCSD 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 Santa Ana Regional Water Quality Control 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 2020/21, PTP operation has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 2,327 tons. For FY 2020/21, the Wells 21/22 Desalter has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 1,154 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 92 mg/L during 2020/21. The effect of providing higher quality domestic water can be seen in the gradual reduction in TDS of the recycled water over the last five 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.

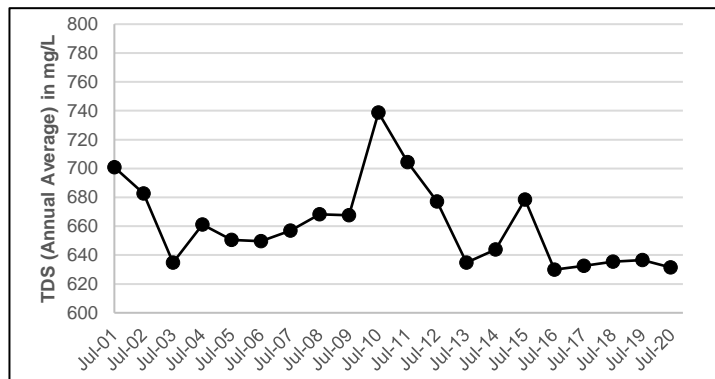


Figure 7-1 MWRP Effluent Total Dissolved Solids (Annual Average)
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Total Heavy Metals

IRWD has been analyzing the heavy metals on the list of inorganic priority pollutants for the last 38 years at MWRP. During the 38-year period, the total mass of heavy metals has increased from 5 pounds per day (lbs./day) to the current 41.18 lbs./day in the influent, a 21.4% increase compared to the previous year, and has increased in the effluent from 10.09 to the current 15.25 pounds per day in 2020/21, an increase of 51.2% 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 88% 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 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 in the influent and effluent of MWRP.

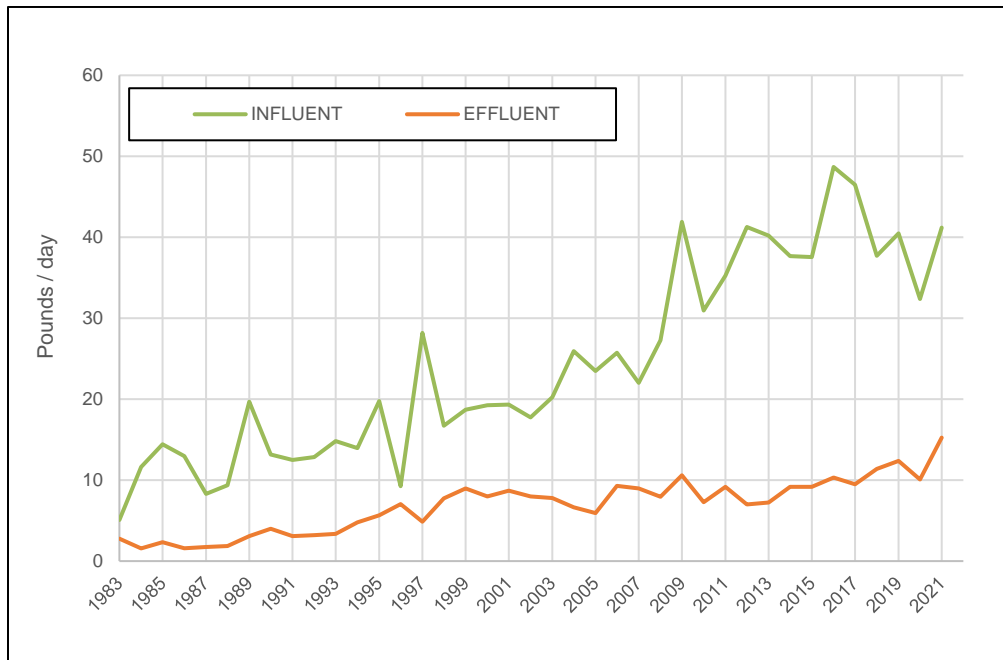


Figure 7-2 MWRP Influent and Effluent Total Heavy Metals
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Copper

The major sources of copper are 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. 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 38-year period from 3.5 to 8.6 lbs./day, while the effluent increased to 0.99 lbs./day during the 2020/21 fiscal year. The mass of copper entering the treatment plant in 2020/2021 remained nearly flat increasing by only 0.4% from the 2019/2020 daily average. The mass of copper in the effluent dropped from 1.17 to 0.99 lbs./day. A decrease of 15.7% from the previous fiscal year.

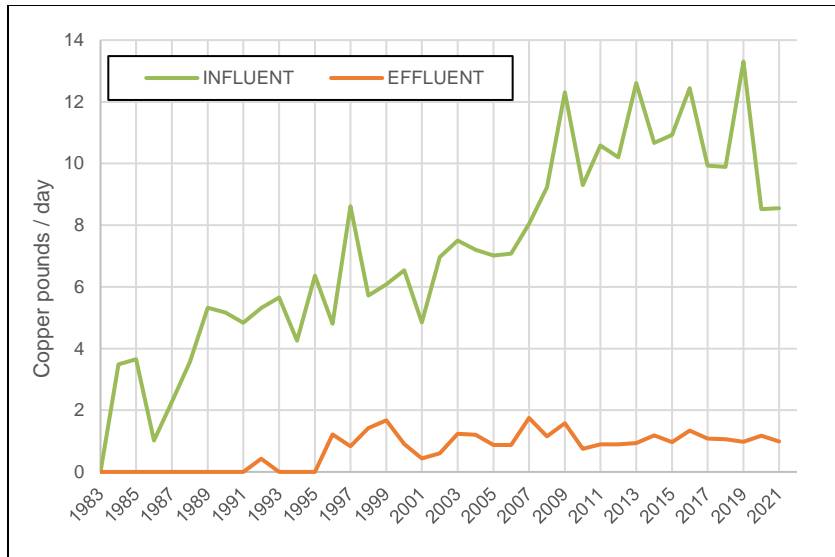


Figure 7-3 MWRP Influent and Effluent Copper
 Irvine Ranch Water District – Michelson Water Recycling Plant
 Orange County Sanitation District, Resource Protection Division

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. Figure 7-4 shows that the mass of zinc in the influent has increased from 4.6 lbs./day to 21.9 lbs./day over 38 years. The influent mass of zinc increased by 2.4 lbs./day or a 12.6% increase from the previous fiscal year. The mass of zinc in the effluent has also increased from 1 lbs./day to 13.36 lbs./day over the last 38 years and saw an increase of 5.63 lbs./day, or 72.8%, from the previous fiscal year.

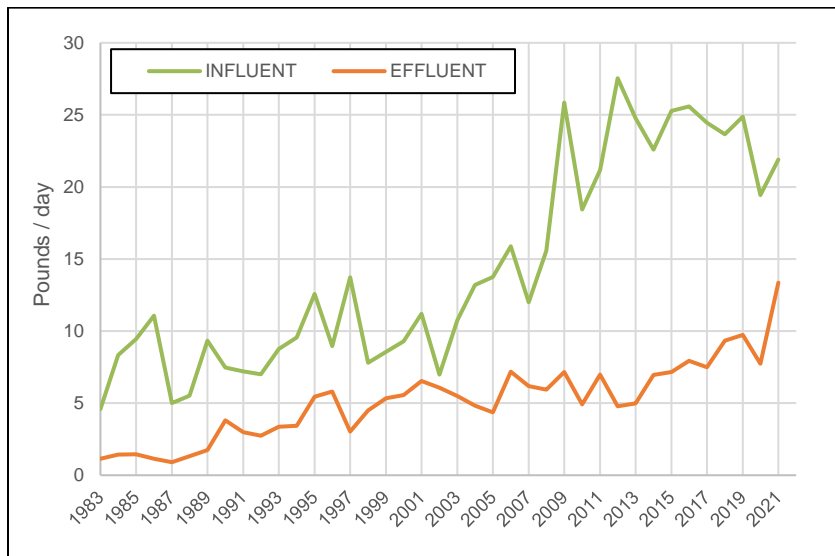


Figure 7-4 MWRP Influent and Effluent Zinc
 Irvine Ranch Water Department – Michelson Water Recycling Plant
 Orange County Sanitation District, Resource Protection Division

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 38 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 1.65 lbs/day. The mass of total organic priority pollutants leaving MWRP decreased from 23.6 lbs/day in 2019/2020 to 17.0 lbs/day this fiscal year. The general increase in effluent organic pollutants above influent levels

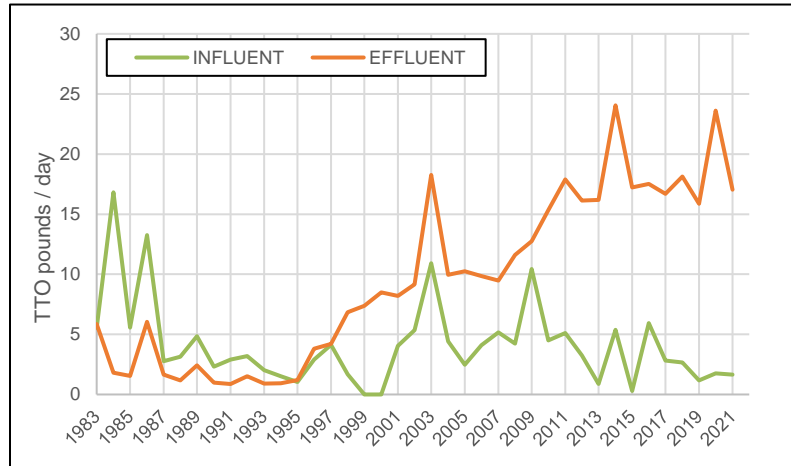


Figure 7-5 MWRP Influent and Effluent Total Toxic Organics
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

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.

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.

7.3.5 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.

7.3.6 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, 2021. 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.

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
Z-371301	3M ESPE Dental Products	2111 Mcgaw Ave. (Irvine)	339114	Dental Equipment and Supplies Manufacturing	OC San

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-541182	Alliance Medical Products, Inc.	9342 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
Z-361006	Ametek Aerospace, Inc.	17032 Armstrong Ave. (Irvine)	334511	Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufactur	OC San
1-541180	Anchen Pharmaceuticals, Inc. (Fairbanks)	72 Fairbanks (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-600359	Anchen Pharmaceuticals, Inc. (Goodyear)	5 Goodyear (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-541179	Anchen Pharmaceuticals, Inc. (Jeronimo)	9601 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
1-600583	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
1-600691	Ceradyne, Inc., a 3M Company	17466 Daimler St. (Irvine)	339114	Dental Equipment and Supplies 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

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-541178	Imuraya USA, Inc.	2502 Barranca Parkway (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	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
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
1-601115	Meggitt (Orange County), Inc.	4 Marconi (Irvine)	334519	Other Measuring and Controlling Device Manufacturing	IRWD
1-600006	Meggitt, Inc.	14600 Myford Road (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
Z-600979	Parker Hannifin Corporation	14300 Alton Parkway (Irvine)	332912	Fluid Power Valve and Hose Fitting 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)	332722	Bolt, Nut, Screw, Rivet, and Washer Manufacturing	OC San
1-600565	South Coast Baking, LLC	1711 Kettering St. (Irvine)	311821	Cookie and Cracker Manufacturing	OC San
1-141007	Teva Parenteral Medicines, Inc.	19 Hughes (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-141163	Tropitone Furniture Co., Inc.	5 Marconi (Irvine)	337124	Metal Household Furniture Manufacturing	IRWD

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-600010	Vit-Best Nutrition, Inc.	2832 Dow Ave. (Tustin)	325411	Medicinal and Botanical Manufacturing	IRWD
Z-600960	Vit-Best Nutrition, Inc.	2802 Dow Ave. (Tustin)	325412	Pharmaceutical Preparation Manufacturing	IRWD

7.3.7 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.

7.3.8 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.

7.3.9 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 2019/20 and 2020/21 fiscal years.

7.3.10 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.

Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2019-2020 and 2020-2021 Orange County Sanitation District, Resource Protection Division – IRWD			
Project No.	Description	2019 – 2020 Labor	2020 – 2021 Labor
3093	Quarterly PP	\$638	\$192
3094	Baseline PP	\$0	\$203
3095	PP Surveillance	\$0	\$1,179
3096	Compat. Surveillance	\$1,498	\$1,279
3098	Industry Info. Collection	\$45,818	\$27,207
3099	Eval. Data/Reports	\$115	\$8,051
3100	OC San/SOCWA	\$0	\$3,286
Total		\$48,069	\$41,397

IRWD records expenses based on project numbers which represent specific activities or groups of related activities. During fiscal year 2020/21, IRWD spent \$41,397 on the operation of its pretreatment program, which is a decrease of \$6,672 from the previous year.

7.3.11 Equipment Purchases for FY 2020-2021

IRWD maintained its existing equipment inventory as shown in Table 7.3.

Table 7.3 Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2020-2021 Orange County Sanitation District Resource Protection Division – IRWD	
Quantity	Description
1	Ford F250
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

7.3.12 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. These tours are temporarily suspended due to the COVID-19 pandemic but will resume as the situation changes. As Revenue Zones Nos. 7 and 14, IRWD is represented by OC San in its public participation activities. 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.

7.3.13 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 2020/2021 IRWD sent approximately 151.28 million gallons of sludge to OC San for treatment, a 14.4% decrease from FY 19/20. IRWD treated and hauled off as Class B solids.

7.3.14 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 38 years. MWRP flow has generally increased over the years with a few exceptions. Average flow for the 2020/21 fiscal year was 21.4 MGD which was a 6.2% increase from the previous fiscal year. The increase in influent flow can be attributed to the return to the continued residential build-out of the Irvine area.

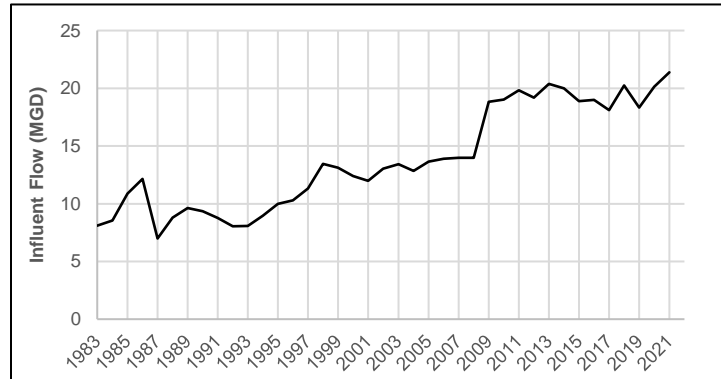


Figure 7-6 MWRP Influent Flow

Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

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.

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 Santa Ana Regional Water Quality Control 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 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

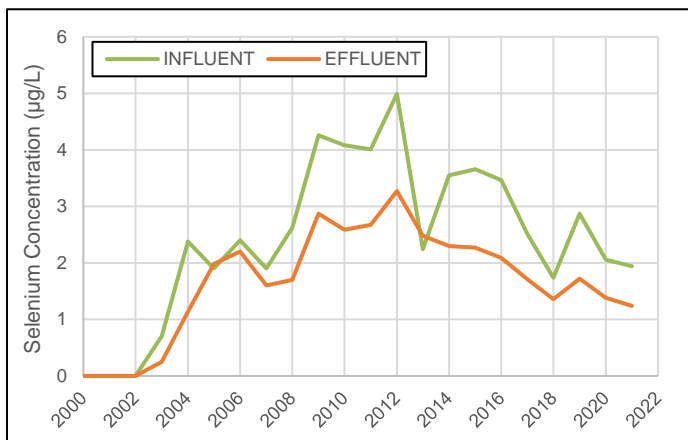


Figure 7-7 MWRP Influent and Effluent Selenium
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

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 1.2 µg/L, under half 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 EQ 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 its Board in May 2018.

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). 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, 2020 through June 30, 2021, a total of 4,009 MG was discharged into the Brine Line, for an average of 10.98 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 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 three dedicated full-time pretreatment personnel and an additional 1.1 full-time equivalent (FTE) to assist with pretreatment responsibilities. Combined, the 4.1 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.

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 serves the eastern portion of the watershed in Riverside County, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

There was no enforcement action during this reporting period.

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 850,000 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 and the Monte Vista Water District.

Enforcement Actions

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

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

Repet, Inc. (Permit No. D1069-4.1)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Repet, Inc. (Repet) on February 11, 2021, for a pollutant limitation violation. On February 9, 2021, IEUA conducted sampling of Permittee's effluent wastewater discharge to the Brine Line. Field analysis of the sample indicated a dissolved sulfide concentration of 2.7 mg/L which exceeded the Daily Maximum Discharge Limitation of 0.5 mg/L as stated in Permit No. D1069-4.1. The NOV/OCA required the permittee to submit a written response by February 18, 2021, detailing the findings of the facilities investigation into the cause of the violation. Furthermore, the NOV/OCA required the permittee to conduct weekly dissolved sulfide monitoring for three consecutive weeks. The results of this analyses were required to be submitted within seven days of each sampling event. On February 18, 2021, the permittee responded stating it cleaned its discharge line from Shaker #2 to the Brine Line connection and all pretreatment related piping and tanks on February 10, 2021. The permittee stated it allowed solid material to flow directly to the Brine Line from Shaker #2 discharge line to the Brine Line while this cleaning took place. Subsequent dissolved sulfide analysis results in February indicated additional non-compliance with the Daily Maximum Discharge Limitation of 0.5 mg/L for dissolved sulfide.

Repet, Inc. (Permit No. D1069-4.1)

A Notice of Violation and Order for Corrective Action (NOV/OCA) along with a Violation Meeting (Violation Meeting) was conducted with Repet, Inc (Repet) on March 18, 2021, for repeatedly exceeding the local permitted limit for dissolved sulfide and for failing to dispose of solids in a manner that prevents such material from entering the Brine Line. The NOV/OCA required the permittee to conduct weekly sulfide monitoring until further notice, continue to implement the corrective action measures stated in written responses submitted to IEUA on February 23, 2021, and March 16, 2021, attend a Violation Meeting, and submit an updated Facility Waste Management Plan (FWMP). The results of the analysis were required to be submitted within seven days of each sampling event. The response submitted on March 16, 2021, states that the permittee ran internal sulfide tests and determined a majority of sulfide generation is in its discharge line between Shaker #2 and the Brine Line connection. The permittee stated it set up continuous dosing of 10 to 12% Sodium Hypochlorite solution at a rate of 1 GPH into its wastewater discharge on March 12, 2021. Additionally, the permittee cleaned its discharge line on March 22, 2021. An IEUA inspector was on site and verified permittee plugged the downstream sewer connection to the Brine Line and used a vacuum truck to remove solids as cleaning was performed to prevent solid material from entering the Brine Line. Furthermore, the permittee submitted an updated FWMP on March 24, 2021. The FWMP stated the permittee will notify IEUA so an inspector can be present during routine lateral cleanings. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Repet 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 for water, sewer, flood control and street infrastructure within the industrial portion of the Mira Loma area. The boundaries of CFD No. 1 expanded from 1,900 acres to 3,000 acres in 1992. In June 1989, JCSD contracted with Western for capacity in Reach IV-D of the Brine Line.

Enforcement Action

There was no enforcement action during this reporting period.

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

Niagara Bottling, LLC (Permit No. I1111-2)

A Notice of Violation and Order of Corrective Action (NOV/OCA) was issued to Niagara Bottling, LLC (Niagara) on April 8, 2021, for failure to submit a required report. On February 18, 2021, SBMWD issued a Written Warning to Niagara for a violation of Permit No. I1111-2. Niagara submitted the Emergency Contact List and Contingency Plan required by Permit No. I1111-2 to SBMWD on February 17, 2021, a violation of the January 31, 2021, due date. The Written Warning required Niagara to submit a written response, detailing the cause of the violation and the corrective action to prevent future violations, to SBMWD by February 28, 2021. On February 26, 2021, Niagara requested an extension of time to submit the written response. Niagara stated the additional time was necessary to allow management to meet to develop a corrective action plan for reporting responsibilities. SBMWD granted the extension and required Niagara to submit the written response by March 31, 2021. Niagara failed to submit the required report by March 31, 2021. The NOV/OCA required the permittee to investigate the cause of the violations and submit a written report detailing its findings along with a corrective actions plan designed to bring its facility into consistent compliance with wastewater permit No. I111-2 by no later than April 15, 2021. The permittee responded on April 8, 2021, and attributed the cause of the violation to an oversight due to personnel changes. The permittee stated a management workshop was held on March 30, 2021, to train personnel on SAWPA permit and reporting requirements and training on new tracking software for due dates. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring along with documentation review at Niagara to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

Rayne Water Conditioning (Permit No. I1066-3)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rayne Water Conditioning on August 19, 2020, for a pollutant discharge violation. On July 7, 2020, SBMWD collected a wastewater sample from Monitoring Point 002. The laboratory analysis results received on July 22, 2020, indicated a Copper concentration of 4.8 mg/L, which exceeded the Daily Maximum Discharge Limitation of 3.0 mg/L as stated in Permit I1066-3. The NOV/OCA required the Permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation no later than August 28, 2020. The Permittee responded on August 27, 2020, and stated the cause of the violation could not be determined and stated a Copper sample collected on June 9, 2020, resulted in .535 mg/L and a Copper sample collected on July 21, 2020 resulted in .283 mg/L. The Permittee stated to prevent future violations the Copper chelating resin tank shall be exchanged on a quarterly basis. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. Additionally, the Permittee is currently undergoing an extensive review of the copper concentrations from their customers to attempt to determine the source of the high concentrations coming into the facility. Furthermore, the Permittee is acquiring additional Copper chelating resin tanks so that the tanks can be run in series to ensure consistent compliance with the permit limitations. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Rayne Water Conditioning to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

Rayne Water Conditioning (Permit No. I1066-3)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rayne Water Conditioning on August 27, 2020, for failure to submit a self-monitoring report (SMR) as required by permit. On July 7,

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

Rayne Water Conditioning (Permit No. I1066-3)

A Monitoring/Production Information Order (MPIO³) was issued to Rayne Water Conditioning (Rayne) on February 25, 2021, for a pollutant discharge violation. On February 2, 2021, SBMWD collected a wastewater sample from Monitoring Point 001. The laboratory analysis results indicated a Copper concentration of 4.0 mg/L, which exceeded the Daily Maximum Discharge Limitation of 3.0 mg/L as stated in Permit I1066-3. The MPIO required the permittee to resample for Copper for fourteen consecutive days and provide the analysis to SBMWD by April 15, 2021. Furthermore, the permittee was required to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than March 4, 2021. The permittee responded on March 3, 2021, and attributed the cause of the violation to be the spent brine receiving inadequate contact time with the chelating resin to remove Copper. The permittee stated a second chelating resin tank was installed inline on February 25, 2021, to allow the spent brine additional time to contact the chelating resin to remove Copper. The resamples conducted on March 1, 2021 – March 5, 2021, March 8, 2021 – March 12, 2021, and March 15, 2021 – March 18, 2021, met the requirements of the fourteen-day MPIO and all indicated compliance. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Rayne Water Conditioning to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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. D1130-1)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rialto Bioenergy Facility, LLC (RBF) on January 20, 2021, for pollutant discharge violations. On December 12, 2020, the Permittee's contract laboratory collected a sample. Analysis of the sample indicated a concentration of 42 mg/L for the

³ MPIO is a SAWPA-specific enforcement action not used by OC San.

parameter of Total Suspended Solids, a violation of the daily maximum discharge interim limitation of 25.0 mg/L as stated by permit No. D1130-1. On December 31, 2020, the permittee's contract laboratory collected a sample. Analysis of the sample indicated a pH of 5.7 s.u. a violation of the minimum discharge limitation of 6.0 s.u. as stated by Permit No. D1130-1. The NOV/OCA required the permittee to provide a written report detailing the cause and corrective actions taken to prevent recurrence of the violations by no later than February 3, 2021. The permittee responded on January 20, 2021, detailing the corrective actions already taken. Permittee retrained all operators on alarms and communications, corrected SCADA set points on pH for the effluent pump to shut down prior to a violation occurring and developed procedures to utilize an inline TSS analyzer with SCADA to shut down discharge if TSS concentrations rise. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. Valley District shall continue to conduct unannounced inspections and wastewater monitoring at RBF Water Conditioning to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

A Notice of Violation (NOV) was issued to Rialto Bioenergy Facility, LLC (RBF) on March 9, 2021, for pollutant discharge limitations. The NOV/OCA addressed seven separate violations (6 BOD exceedances from self-monitoring reports and a single TSS exceedance detected in Quarterly Agency monitoring). The permittee's contract laboratory collected samples on January 7, January 8, January 10, February 4, February 7, and February 19, 2021, that showed violations of the daily maximum discharge interim limitation for Biochemical Oxygen Demand (BOD) of 25.0 mg/L as stated by permit No. D1130-1. A sample was collected by Valley District on February 3, 2021. Analysis of the sample indicated a violation for the parameter of Total Suspended Solids (TSS) for the daily maximum discharge interim limitation of 25.0 mg/L as stated by permit No. D1130-1. This was the second exceedance for TSS since the facility began discharging in December 2020. The NOV/OCA required the permittee to provide a narrative explaining the cause of the continued violations to the BOD and TSS interim permit limitations of 25.0 mg/L. Additionally, the permittee was required to address all permit limit violations with a corrective action plan by March 16, 2021, to meet the interim limits for BOD and TSS until a new lateral connection to the Brine Line can be installed by the permittee. The permittee responded on March 16, 2021 and provided causes and corrective actions for the pollutant discharge violations, however, the corrective actions did not include a timeline for construction of the pipeline. Following additional pollutant discharge limitation violations escalated enforcement was issued directly by SAWPA.

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). 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

Aramark Uniform & Career Apparel, LLC (Permit No. D1004-1)

A Cease and Desist Order and Compliance Order (Order) was issued to Aramark Uniform & Career Apparel, LLC (Aramark) by SAWPA on May 12, 2020, for a pollutant discharge violation and a hazardous waste discharge to the Brine Line. On March 30, 2020, Aramark Operators staff discovered an accidental discharge of sulfuric acid caused by operator error. The wastewater discharged into the Brine line had a pH of less than 6.0 Standard Units (S.U.) a violation of the minimum daily discharge limitation for the parameter of pH of 6.0 S.U., and at times less than 2.0 S.U., which is subject to the hazardous waste

reporting criteria required by 40 CFR 403.12(p) and Section X.B of the Permit. The approximate flow discharged reported was 21,000 gallons and the discharge of wastewater with a pH of less than 2.0 S.U. occurred for approximately 20 minutes. Aramark made immediate notification to Western, SAWPA, OCSD, and RWQCB. Aramark was required to immediately cease and desist the discharge of noncompliant wastewater from Aramark to the Brine Line, conduct and document Slug Load Control Plan (SLCP) training for all appropriate Aramark personnel, complete installation of a digital final effluent pH meter recorder for download of complete pH monitoring data, and complete installation of a new brine regeneration softener system to eliminate the necessity for the sulfuric acid currently employed in this process, which resulted in the low pH discharges to the Brine Line as a corrective action for the non-compliant discharges within sixty days of receipt of the Order. Aramark responded on May 20, 2020, documenting completion of the installation of the new Brine regeneration system and completion of the SLCP training. Additionally, Aramark provided a plan for the installation of a digital final effluent pH recorder for download of complete pH monitoring data. The installation is to be completed within thirty (30) days of SAWPA's approval, which was granted on June 8, 2020. Aramark completed installation of the pH recorder on July 8, 2020. Review of the required submittals from Aramark and inspection of the completed projects indicated the corrective actions were completed on July 30, 2020. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed on August 13, 2020. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

On May 13, 2021, an Administrative Compliance Order (Order) was issued by SAWPA for continued pollutant discharge violations. Additionally, an Interim Discharge Period Extension was issued, which allowed continued discharge to the existing connection to the Brine Line to no longer than November 9, 2021. On March 7, 2021, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The laboratory analyses results indicated a Biochemical Oxygen Demand (BOD) concentration of 28 mg/L, which exceeded the Daily Maximum Discharge Limitation of 25 mg/L as stated in Permit No D1130-1. On March 20 and May 5, 2021, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The laboratory analyses results indicated Total Suspended Solids (TSS) concentrations of 49 mg/L and 110 mg/L, which exceeded the Daily Maximum Discharge Limitation of 25 mg/L as stated in Permit No D1130-1. The Order requires the permittee to complete construction of a new lateral connection to the Brine Line by November 9, 2021. Furthermore, the permittee is required to provide weekly updates on the process of obtaining the necessary permits for construction of the new lateral connection and within 5 business days of receipt of these permits submit a written report to SAWPA. The Permittee will submit a monthly progress report on the construction of the new lateral connection and submit written notice of its completion within 5 days of completion of all construction activities. As of June 30, 2021, the permittee is submitting the weekly updates on the process of obtaining the necessary permits for construction of the new lateral connection as required.

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. H1126-2.2)**
22740 Temescal Canyon Road, Corona, CA 92883
- **Environmental Management Technologies, Inc. (Permit No. H1025-3.1)**
1456 S. Gage Street, San Bernardino, CA 92408
- **Haz Mat Trans, Inc. (Permit No. H1033-3.1)**
230 E. Dumas Street, San Bernardino, CA 92408

- **K-VAC Environmental Services, Inc. (Permit No. H1049-3)**
8910 Rochester Avenue, Rancho Cucamonga, CA 91730
- **Rayne Water Conditioning (Permit No. H1066-3.2)**
939 West Reece Street, San Bernardino, CA 92411
- **Triumvirate Environmental Services, Inc. (Permit No. H1132-1)**
10600 S Painter Ave, Santa Fe Springs, CA, 90670
- **Western Environmental Services, Inc. (Permit No. H1098-3)**
400 W. Foothill Blvd., Suite H, Glendora, CA 91740

Enforcement Action

Haz Mat Trans, Inc. (Permit No. H1033-3.1)

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

Haz Mat Trans, Inc. (Permit No. H1033-3.1)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Haz Mat Trans, Inc. by SAWPA on March 15, 2021, following an attempt by Haz Mat to discharge brine wastewater, which originated from Prudential Overall Supply (Prudential) to the Western Municipal Water District's (Western) Collection Station on December 14, 2020. During the discharge of Prudential's wastewater, the effluent valve, which is controlled by a pH meter, closed due to a low pH of 2.9 S.U. being detected. The effluent valve will close the discharge of wastewater to the Brine Line if the pH is not within 6.0 -12.0 S.U. discharge limitation for pH. SAWPA and Western personnel conducted an investigation into the Prudential rejected load due to the low pH of 2.9 S.U. During the investigation, the Haz Mat employee that was driving the Haz Mat tanker (employee) stated prior to leaving Prudential a load of unknown wastewater was mixed into Haz Mat's tanker for disposal at the Western Collection Station. After the load was rejected, the employee stated he returned to Prudential to discover the wastewater which was mixed into the Haz Mat tanker had a pH of 1.0 S.U. The Haz Mat employee was previously identified by Haz Mat as the driver that failed to properly follow the Haz Mat Liquid Waste Hauler Cleaning and Maintenance Plan as documented in the NOV/OCA issued on November 12, 2020. Haz Mat responded on March 24, 2021, and attributed the cause of the violation to driver error. Furthermore, Haz Mat removed this employee from their Driver List and conducted training for all remaining drivers for the proper procedures for collecting wastehauler loads. Review of the training documents indicated not all drivers had completed the sign-in log for the training identified. Haz Mat responded with the proper documentation on May 18, 2021. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.8 Western Municipal Water District (Western)

Description of Western

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

Enforcement Action

Aramark Uniform & Career Apparel, LLC (Permit No. D1004-1.1)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Aramark Uniform & Career Apparel, LLC (Aramark) on February 25, 2021, for a pollutant discharge violation. On February 10, 2021, the permittee's contract laboratory collected a sample. Analysis of the sample indicated a concentration of 2.5 mg/L for the parameter of Lead, a violation of the daily maximum discharge interim limitation of 2.0 mg/L as stated by permit No. D1004-1.1. The NOV/OCA required the permittee to provide a written report detailing the cause and corrective actions taken to prevent recurrence of the violations by no later than March 11, 2021. Additionally, the NOV/OCA required the permittee to resample for Lead for three consecutive weeks and provide the first results of this special sampling to Western by March 27, 2021. The remaining results were required to be submitted to Western within ten days of receipt. The permittee submitted the response on March 11, 2021, stating a malfunctioning flocculent pump in the pretreatment system led to the violation. Training was conducted with operators to make sure chemical feed pump issues are addressed immediately and the discharge is discontinued during repair. The first resample collected on March 2, 2021, indicated a Lead concentration of 1.1 mg/L, the second resample collected on March 10, 2021, indicated a Lead concentration of 0.15 mg/L, the third resample collected on March 18, 2021, indicated a Lead concentration of 1.2 mg/L. All resamples were found in compliance with the Daily Maximum Discharge Limitation of 2.0 mg/L as stated by permit No. D1004-1.1. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed on August 4, 2020. Western shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

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

Prudential Overall Supply (Permit No I1062-4)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Prudential Overall Supply (Prudential) on January 20, 2021, regarding an unpermitted discharge attempted and the resulting rejected load at the Western Collection Station. 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 February 3, 2021. Permittee submitted the required report on February 3, 2021. The permittee stated that training was conducted with maintenance employees identifying that only the contents of the brine tank are to be loaded by the Liquid Wastehauler (LWH) for discharge at the Collection Station. Additionally, a larger brine tank was installed to ensure no additional sources could be picked up by the LWH for discharge at the Collection Station. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. Western shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

Temescal Desalter (Permit No. D1012-4)

A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Temescal Desalter on April 27, 2021, for a pollutant discharge violation. On April 14, 2021, the permittee collected a wastewater sample from Monitoring Point 001. The laboratory results indicated a pH of 4.75 SU, which exceeded the Daily Minimum Discharge Limitation of 5.0 SU as stated by Permit No. D1012-4. Furthermore, the permittee failed to notify the Control Authorities of the violation as required. 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 May 11, 2021. Permittee responded on May 10, 2021 and attributed the cause of the violation to the clean-in-place (CIP) process on the R.O. train #4. The Permittee modified the CIP SOP to include immediate Lead and Supervisor notification in the event the Brine Line online pH probe reads below 6 or above 12; the Lead or supervisor will then immediately notify Western of the event. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. Western shall continue to conduct inspections and wastewater monitoring at the Collection Stations 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 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 emergency permit fact sheet and 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 to 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 service area, except for the areas upstream of the Corona WRF No. 1 and WRCWRA SRPS, all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by Western 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 permit Western directs the City of Corona, with oversight by SAWPA, through their industrial 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 Pretreatment Department and reviewed. Pretreatment personnel visit the site to verify the information submitted in the questionnaire.

In the Western 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 is primarily domestic (reclaimable) wastewater will be diverted to the Pine Avenue Sewer, away from the Brine Line, when the diversion project is completed. Diversion of the CIW wastewater to the Pine Avenue Sewer away from the Brine Line is anticipated for Fiscal Year 2021/2022.

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 anticipated completion of construction for the expanded plant will be third quarter of Fiscal Year 2021/2022.

In-N-Out Burger, Chino Distribution Center (INO) is a new facility in the City of Chino that will generate wastewater from INO's meat processing and spread/sauce production. The facility is currently in construction and will begin operations in the third quarter of Fiscal Year 2021/2022.

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

7.4.7 SAWPA Special Projects

SAWPA conducted the following special project efforts during the reporting period:

1. Right of way (ROW) maintenance including road grading and vegetation removal for Reach 4A Lower and Reach 4B Lower (behind Prado Dam).
2. Pipeline cleaning, pipeline inspection, and scale assessment for Reach 4B Upper.
3. Inspection of Reach 4A Upper maintenance access structures
4. Repaired corrosion protection liner on Reach 4A maintenance access structures (21 total).
5. Siphon cleaning on Reach 4A Upper (Pine Avenue Siphon).
6. Siphon cleaning on Reach 4E (La Cadena Siphon).
7. Inspection of Reach 4E maintenance access structures
8. Overhaul of 54 air release and vacuum valves on Reach 5.

Activity	Reach 4A Lower	Reach 4B Lower	Corona Lateral	Reach 4A Upper	Reach 4D
ROW Maintenance	1.5 miles	3 miles			
Line Inspection				3.5 miles	
Line Cleaning					1,000 ft
MAS Inspected	17	15	35	50	15
Siphon Cleaned			2		1

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 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

Table 7.4 Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2020 – June 30, 2021 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		
None		
JCSD Permittees		
None		
SBMWD Permittees		
None		
Valley District Permittees		
None		
SAWPA Permittees		
None		
Western Permittees		
None		

7.4.10.1 Summary of Permittees in SNC Newspaper Notice

There were no Permittees in Significant Noncompliance.

7.4.11 Non-Industrial Source Control and Public Education Programs

EMWD supports an extensive education program designed to provide a 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 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 15 dental facilities in the service area in 2020, 7 of which are non-amalgam users such as orthodontics. Of the 8 remaining facilities Beaumont received 8, which required compliance reports with 1 requiring a scheduled follow up.

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 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 (OCTR) survey to these dental facilities. A second and third round of the OCTR 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 OCTR 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. Approx. 95% of the surveys have been received.

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 (OCTR) 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 SBWMD 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).

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)

Western has no direct connections from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires WMWD 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. A total of 104 surveys have been collected and there are 7 surveys that remain outstanding. There are a total of 111 facilities that are being tracked. As the monitoring of new and renewed business licenses continues, there is a constant rotation of surveys due.

- **WRCRWA SRPS**

WRCRWA has four agency jurisdictions that discharge to the WRCRWA SRPS: Western, Home Gardens, City of Norco, and intermittently, City of Corona. The Western 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 is currently in the process of reaching out to the facilities that have yet to return a survey to determine if they are still in business.

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 is in the process of issuing surveys to all dental facilities and have received all but one of those back at this time. YVWD is in the process of pursuing enforcement actions on those that have not completed the surveys.

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, and a Pretreatment Program Technician, with an additional 1.1 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 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 retained the services of a consultant to conduct an audit of the Brine Line Pretreatment Program. This audit was conducted from November of 2020 through January 2021. The final report was delivered and has been distributed to the SAWPA Agencies and OC San. No major findings were identified by the auditors. Additionally, SAWPA has conducted the first phase of the Semi-Annual Brine Line Audit SAWPA conducts with the distributed pretreatment program administered by the SAWPA Agency staff. SAWPA is currently compiling individual agency audit reports and anticipates issuance in August 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 June 11, 2020 and have been working collaboratively with OC San throughout the year to further refine this revision.

7.4.14 Pretreatment Program Budget

Staffing – EMWD

As of June 30, 2021, 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 2020/21 was \$373,379.

Staffing – IEUA

As of June 30, 2021, the Pretreatment Program staff consists of 1 manager, 1 deputy manager, 1 engineer, 4 field inspectors, and 1 administrative support personnel for a total of 8 staff members. The total estimated budget for FY 2020/21 was \$191,456. This represents the total estimated budget dedicated to Brine Line activities.

Staffing – JCSD

As of June 30, 2021, the Pretreatment Program staff consists of 1 supervisor, 2 field inspectors and a sewer sample technician for a total of 4 staff members. The JCSD Pretreatment Budget for FY 2020/21 was \$284,290 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, 2021, the Pretreatment Program staff consists of 1 manager, 3 field technicians, 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 2020/21 for staff and equipment was \$768,124. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

Staffing – Valley District

As of June 30, 2021, 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 2020/21 was \$68,128, which includes the sampling and monitoring costs. Valley District management time is estimated at approximately 10% of the program implementation budget, or \$6,813. The Agency does not track time to differentiate between Brine Line and non-Brine Line activities. Total cost for FY 2020/21 was approximately \$74,941.

Staffing SAWPA

As of June 30, 2021, the Pretreatment Program staff consisted of 1 manager, 1 specialist, and 1 technician. An additional 1.1 FTE is contributed from 2 engineers, and 2 technical support personnel. The actual Brine Line Pretreatment Program activity expenditures for FY 2020/21 were \$1,273,000.

Staffing – Western

As of June 30, 2021, the Pretreatment Program staff consists of 1 manager, and 2 Source Control Specialists for a total of 3 staff members. Estimated budget for FY 2020/21 was \$300,000 (this figure does not include sampling costs, which are assigned to the customer as a pass-through charge). The District 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 represents 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.”

Table 7.5 Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2020/21						
Santa Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division						
Equipment Description	Quantity					
	EMWD	IEUA	JCSD	SBMWD	SAWPA	Western
Vehicles	7	4	3	3	2	8
Automated Samplers	11	18	9	15	6	14
Handheld Portable Samplers	-	-	2	5	1	-
Sampler Batteries	24	25	18	31	5	8
Sampler Battery Chargers	12	18	2	4	1	1
Sampler Battery Power Packs	-	-	-	-	1	1
Portable Area/Velocity Flow Meters	-	5	5	-	-	-
Gas Meters/Detectors with Pumps	6	4	-	2	1	2
Laboratory Dishwashers	-	1	1	-	-	-
Ice Machines	-	1	2	1	1	2
Portable pH Meters	6	8	4	6	1	2
Sulfide Test Kits	1	7	1	2	1	3
SONDE Trunk Line Monitoring Devices	-	4	-	-	-	-
Laptop Computers	6	4	1	1	2	3
Continuous H ₂ S Trunkline Monitoring Devices	-	4	-	-	-	-
Spill Response Kits	-	-	-	3	-	1

7.4.16 SAWPA Pretreatment Program Training

SAWPA, Beaumont, EMWD, IEUA, JCSD, SBMWD, Valley District, Western 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 2020/21 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 2020/21 fiscal year by SAWPA for member/Contract Agencies. The following training classes were conducted with all SAWPA agencies represented:

- SAWPA iPACS Migration Training – September 17, 2020
- SAWPA Letter to Discharge Training – November 19, 2020
- SAWPA Permit Template Training – January 21, 2021
- Agency PFAS Wastewater Sampling Roundtable Discussion – March 18, 2021
- SAWPA Permit Writing Training – May 20, 2021
- SAWPA Inspection and Enforcement Summaries in iPACS Refresher Training – June 17, 2021

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. Visit 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 exceptional quality (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 2020/21, 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	2011-12	41	2.3	11	7.4	6.6	66	22
	2012-13		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		
Cadmium	2011-12	39	0.8	6.0	3.8	1.1	4.4	3.6
	2012-13		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		
Chromium	2011-12	**	42	74	52	40	70	56
	2012-13		42	56	49	42	59	49
	2013-14		39	52	45	40	53	46
	2014-15		30	51	40	34	70	46
	2015-16		31	89	46	28	60	46
	2016-17		30	89	49	29	67	46

Table 8.1. Trends in Trace Metal Content of Biosolids, Fiscal Years 2011/12-2020/21, 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
	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
Copper	2011-12	1,500	430	670	520	380	720	520
	2012-13		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		
Lead	2011-12	300	ND	25	9.0	ND	32	13
	2012-13		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		
Mercury	2011-12	17	0.8	1.4	1.2	0.8	2.6	1.3
	2012-13		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		
Molybdenum	2011-12	**	6.5	18	13	12	20	17
	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
	2019-20		14	22	18	14	24	18
2020-21	15	21	18	17	23	20		
Nickel	2011-12	420	15	48	35	20	39	31
	2012-13		34	48	40	23	41	30
	2013-14		36	55	43	28	56	37
	2014-15		26	47	37	26	41	34

Table 8.1. Trends in Trace Metal Content of Biosolids, Fiscal Years 2011/12-2020/21, 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*		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
Selenium	2011-12	100	ND	26	9.0	ND	19	9.0
	2012-13		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
Silver	2011-12	**	7.0	14	10	4.0	12	8.5
	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
Zinc	2011-12	2,800	560	880	710	560	910	750
	2012-13		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
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).							

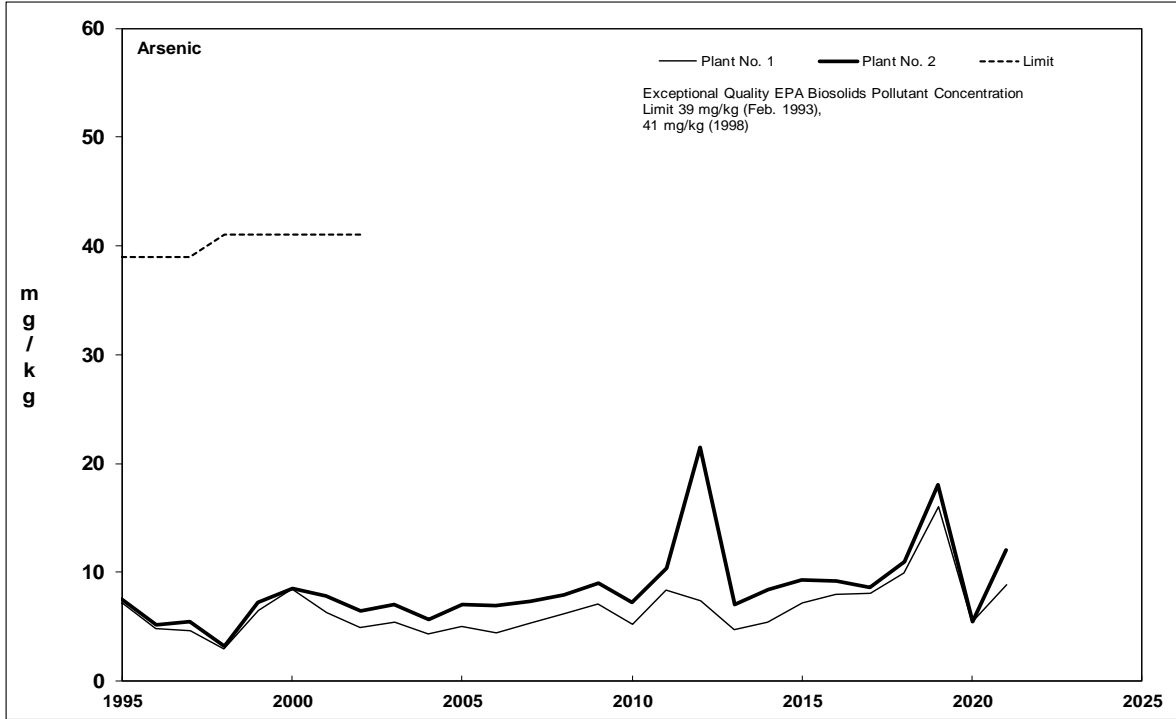


Figure 8-1 Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

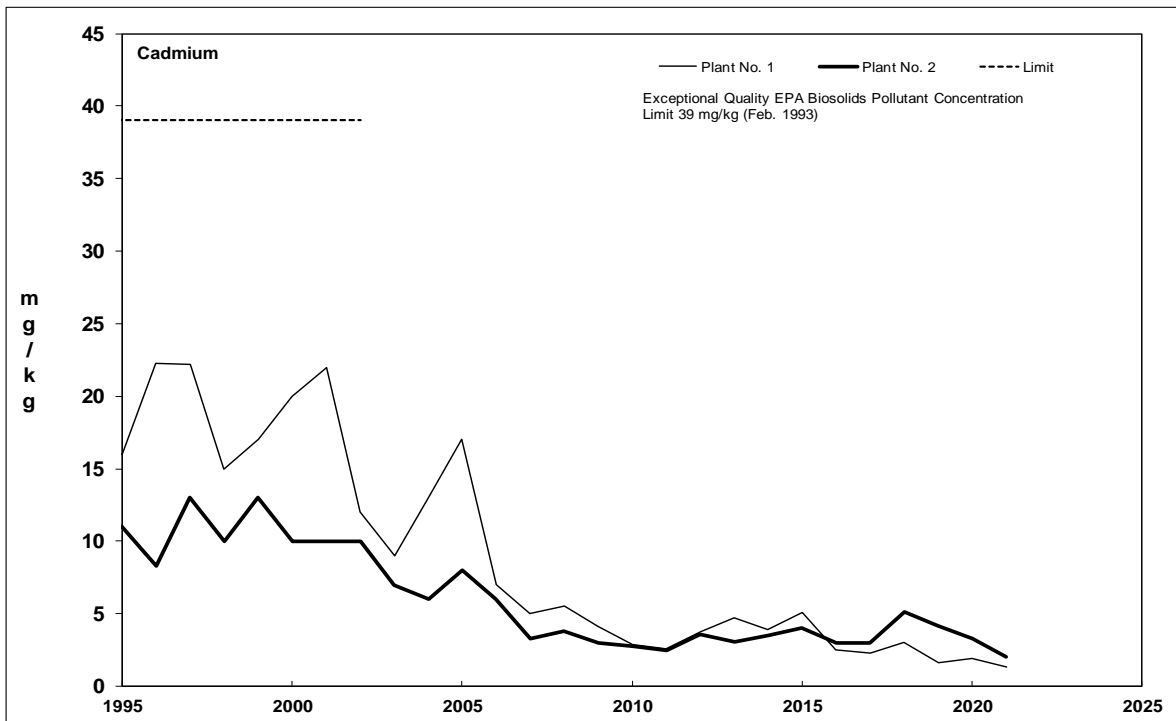


Figure 8-2 Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

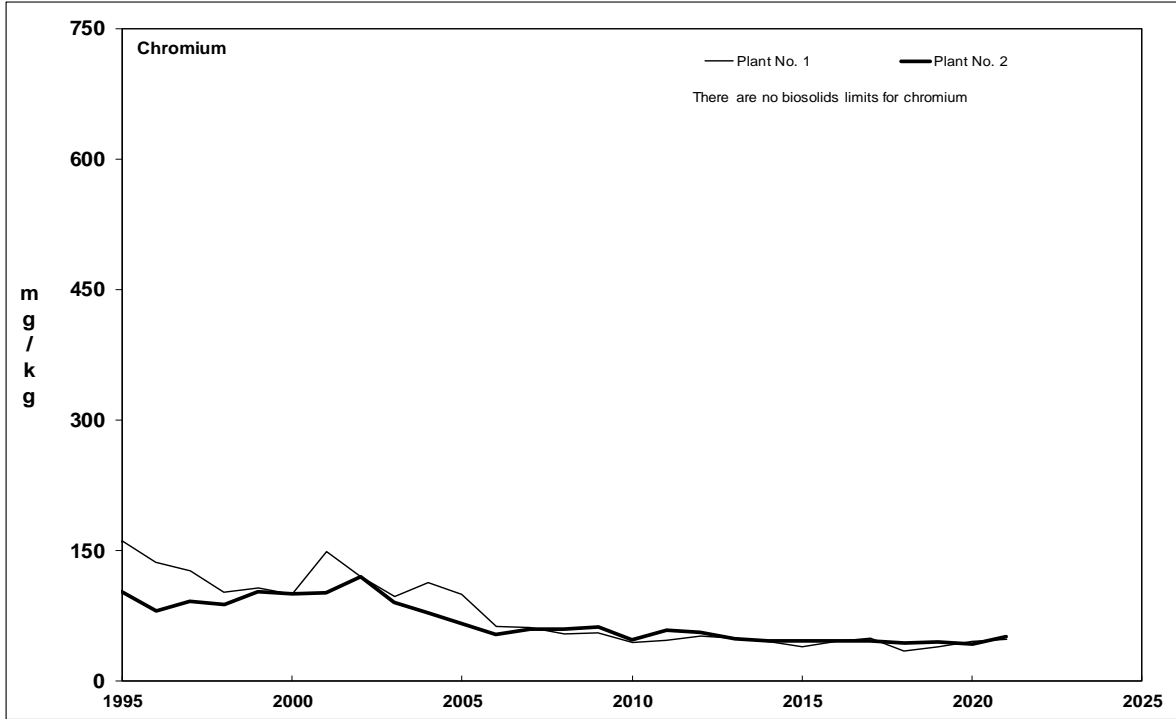


Figure 8-3 Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2020/21
 Orange County Sanitation District, Resource Protection Division

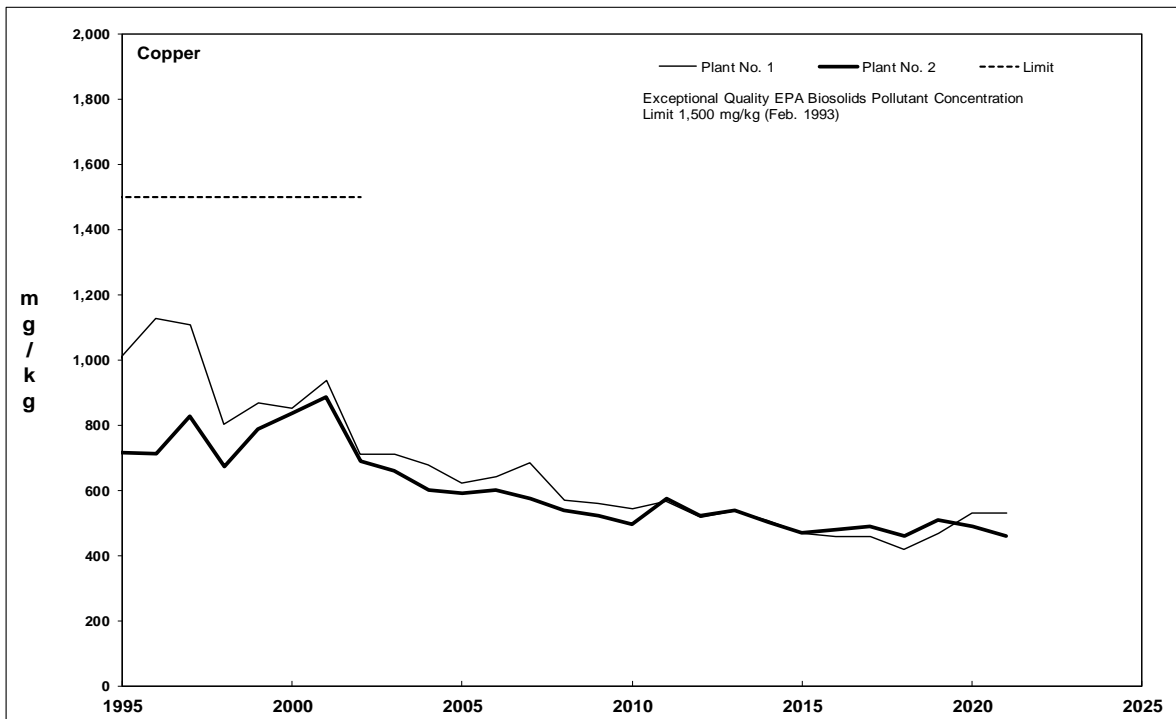


Figure 8-4 Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2020/21
 Orange County Sanitation District, Resource Protection Division

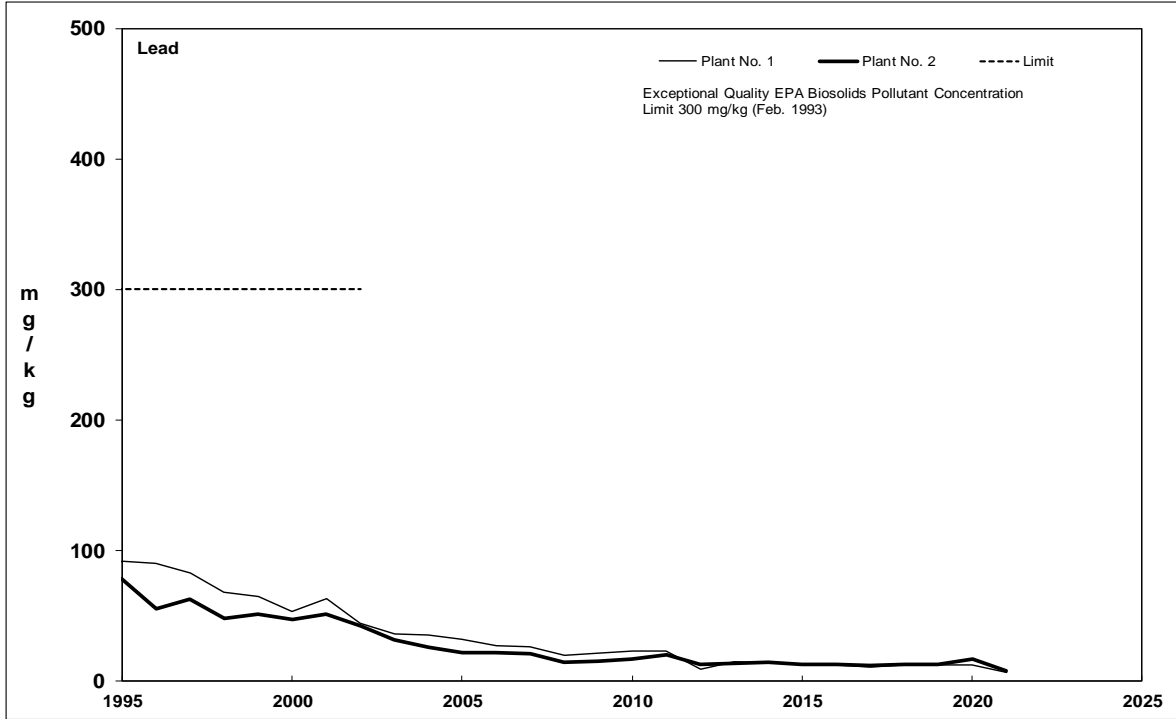


Figure 8-5 Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

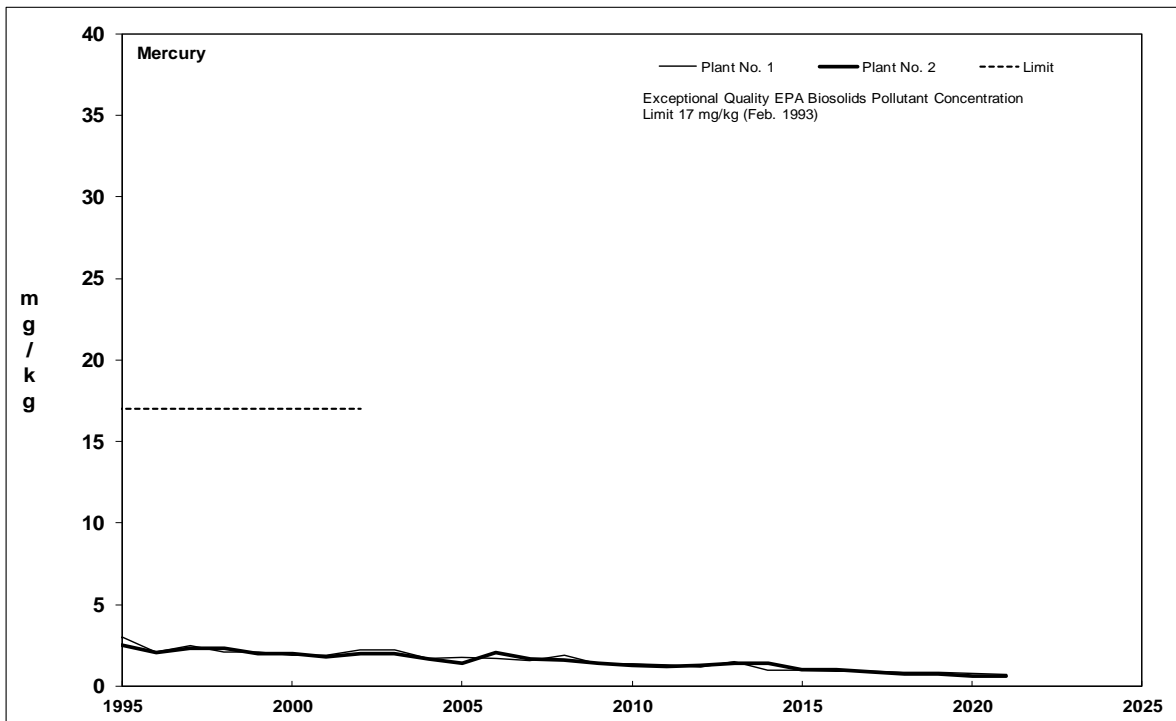


Figure 8-6 Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

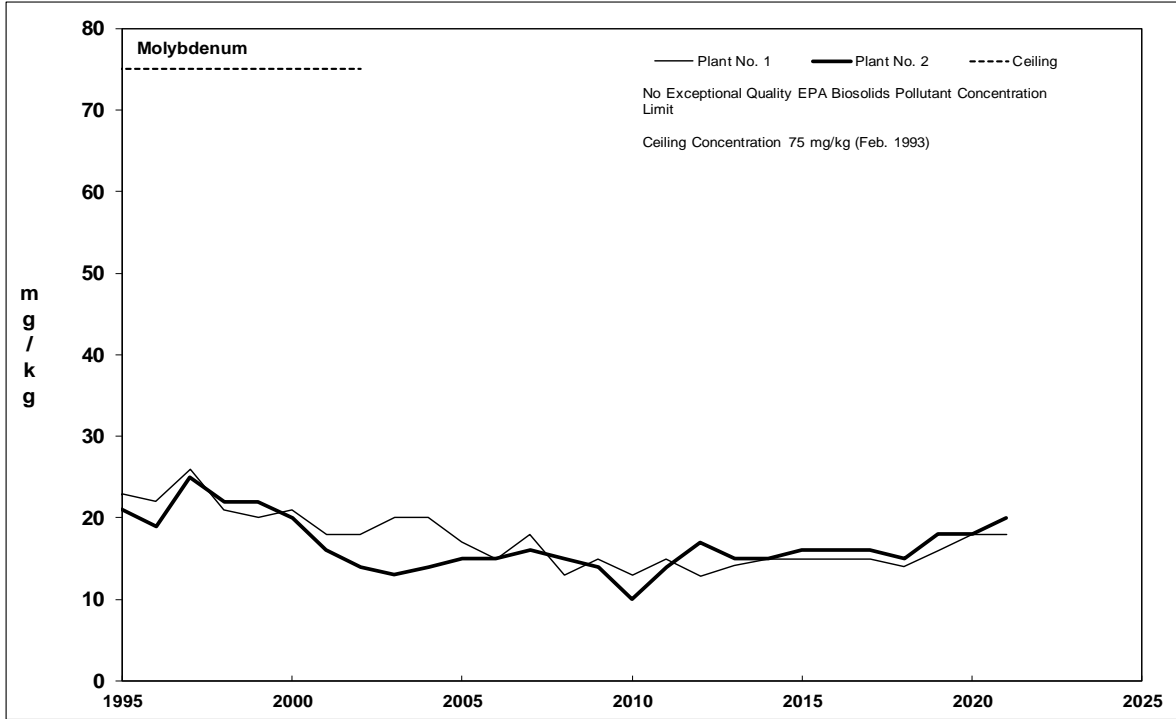


Figure 8-7 Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

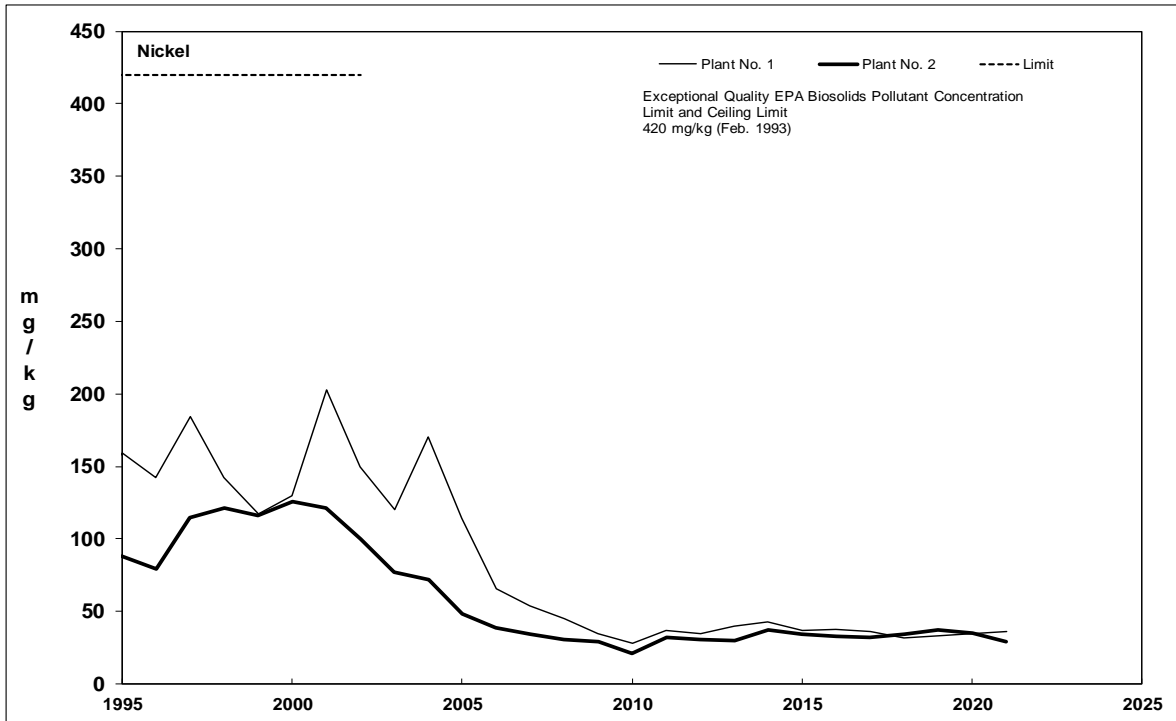


Figure 8-8 Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

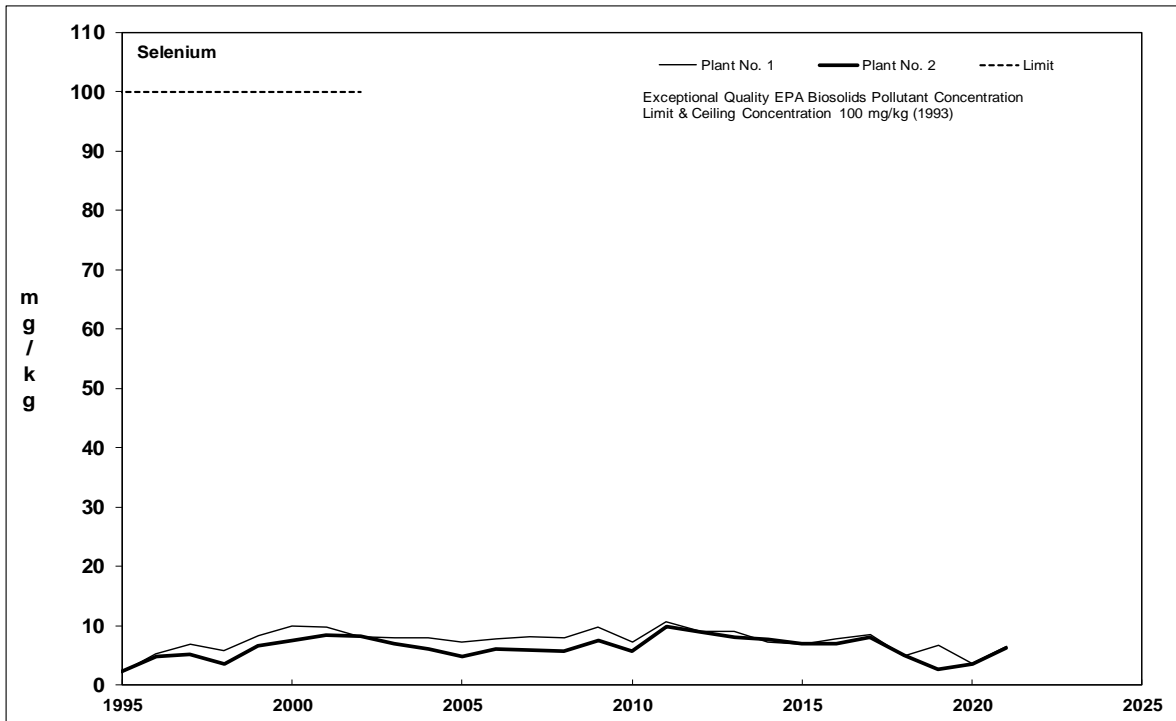


Figure 8-9 Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

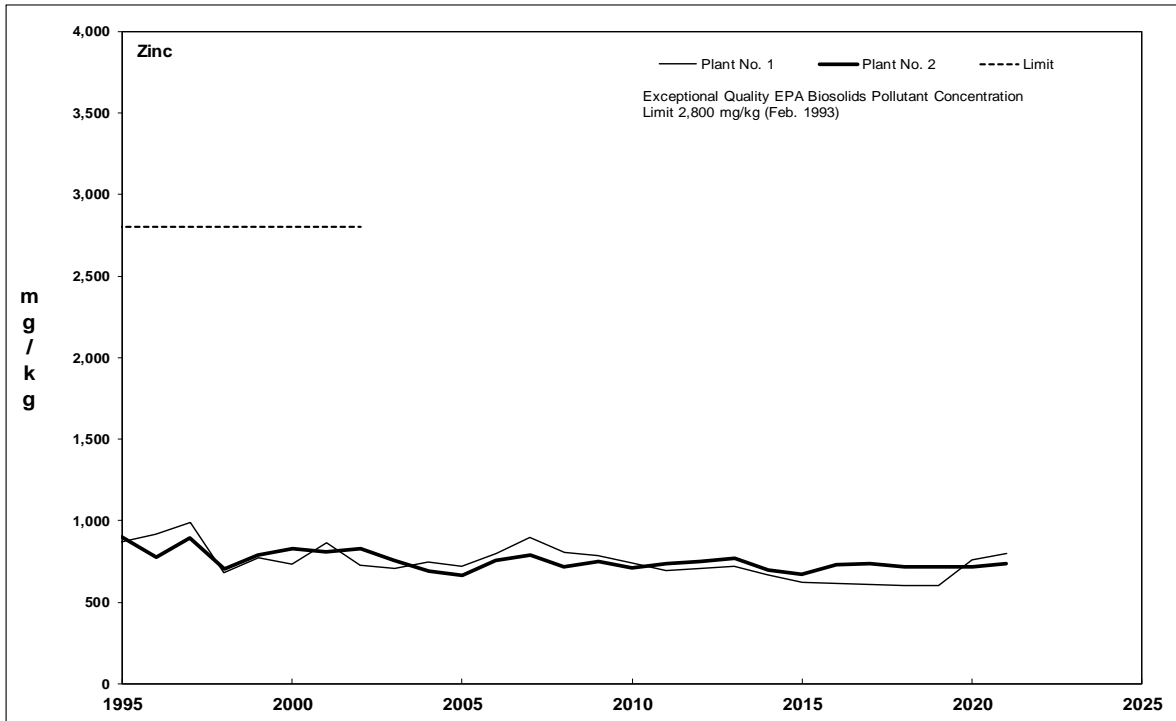


Figure 8-10 Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2020/21
Orange County Sanitation District, Resource Protection Division

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. 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 started programs to address emerging concerns or issues. Sometimes 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.

Table 9.1 Non-Industrial Source Control Programs, FY 2020/21 Orange County Sanitation District, Resource Protection Division	
Programs	
Fats, Oils and Grease Control	
Radiator Shops	
Dry Cleaners	
Dry Weather Urban Runoff Diversions	
Dental Amalgam	

9.2 Fats, Oils, and Grease (FOG) Control Programs

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 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 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. OC San completed its most recent audit of the SSMP in May 2021. 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 2020/21.

Program Administration

The commercial FOG Program is administered through a combination of permitting, inspection, compliance tracking, report monitoring, and enforcement. The main elements of the FOG 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 a permit reissuance as the permit is non-transferrable. During FY 2020/21 OC San managed thirty-seven (37) FOG permittees with two (2) permits listed as void or expired 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 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 corrective action notice (CAN). The CAN is followed by a Notice of Violation 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 geographic information system (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.

Table 9.2 FOG Program Effectiveness, FY 2020/21 Orange County Sanitation District, Resource Protection Division		
Spills	FY 2019/20	FY 2020/21
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

9.3 Radiator Shops

The Radiator 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 2020/21 contained fourteen (14) radiator shops.

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 annually certify 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.

Certifications 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 2020/21, there were a total of two hundred forty-eight (248) dry cleaning facilities in the OC San Dry Cleaner Certification Program. During the FY 2020/21 cycle, OC San deferred PERC facility inspections.

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. However, 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. Next fiscal year, because PERC should no longer be present at the dry cleaner facilities, OC San intends to conduct program closure inspections and anticipates that the inspection findings will support closing the Dry Cleaner Certification Program.

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 address 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 storm water. 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-one (21) active Dry Weather Urban Runoff diversion structures are permitted, three owned and operated by the County of Orange, eleven (11) owned and operated by the City of Huntington Beach, three (3) owned and operated by the City of Newport Beach, three (3) facilities 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 the next fiscal year, OC San anticipates as many as two (2) additional Agreements will become approved that will facilitate management and permitting for three (3) additional diversions from three new drainage basins.

Table 9.3 shows the range of monthly diversion discharges and the total discharge over the past six years.

Table 9.3 Dry Weather Urban Runoff Discharges, FY 2015/16 – 2020/21 Orange County Sanitation District, Resource Protection Division		
FY	Million Gallons Discharged	Monthly Average Flow Range (MGD)
2015/16	262	0.32 – 1.21
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

The diversions cumulatively discharged 565 million gallons (MG) of Dry Weather Urban Runoff, with a normalized discharge of 1.85 MGD, and a monthly flow range between 1.38 and 3.07 MGD. The flow volume trended upward by 85 MG from the previous year, reflecting the observed year-over-year increase in dry weather days during FY 2020/21, and increased flows from the Huntington Beach diversions.

Flows for the 11 City of Huntington Beach diversions increased 115 MG from FY 2019/20 totals. Total cumulative flow discharge for the three active Orange County Public Works (OCPW) diversions, Huntington Beach, Greenville Channel, and Santa Ana River, decreased slightly (3 MG) from the previous year and the Greenville Channel diversion remained under repair for the entire year. The flow from the three IRWD diversions, Muddy Canyon, Los Trancos Canyon, and Peters Canyon, decreased 12 MG overall. The flow from the City of Newport Beach diversions decreased 15 MG over the previous year, with the Big Canyon, and the Mid-Big Canyon diversions contributing most of the flow at approximately 5 MG and 4 MG respectively, to the Newport Beach 9.6 MG flow total. The Pelican Point Diversion flow rate continues to remain consistent with previous report period totals.

Only three (3) of the twenty-one (21) 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 not currently available for reclamation. The Santa Ana River and Peters Canyon Diversions discharged a total of 120 MG to Plant No. 1 in FY 2020/21. These two diversions account for 21.2% of the total Dry Weather Urban Runoff diverted to the OC San's collection system in FY 2020/21 and contributed an average of 10 MG per month to GWRS.

If current discharge trends continue, OC San expects to receive between 450 MG and 1,000 MG next fiscal year from the existing diversions. During the past 22 years, OC San treated over 10.7 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 \$12.4 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.

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2020/21 Orange County Sanitation District, Resource Protection Division					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge⁺ (MGD)¹
<i>Owned and Managed by the City of Huntington Beach</i>					
1	Atlanta Diversion	8151 Atlanta Avenue	Coast (via Atlanta Interceptor)	Plant No. 2	0.280
2	Banning Diversion	2201 Malibu Lane	Miller-Holder	Plant No. 2	0.127
3	Newland Diversion	8612 Hamilton Street	Coast (via Atlanta Interceptor)	Plant No. 2	0.311
4	Indianapolis Diversion	9221 Indianapolis	Miller-Holder	Plant No. 2	0.050 ^A
5	Hamilton Diversion	10101 Hamilton Avenue	Miller-Holder	Plant No. 2	0.114
6	Meredith Diversion	20192 Mainland Lane	Miller-Holder	Plant No. 2	0.025
7	Flounder Diversion	9731 Flounder Drive	Bushard	Plant No. 2	0.011
8	Yorktown Diversion	9211 Yorktown Avenue	Miller-Holder	Plant No. 2	0.011
9	Adams Diversion	19661 Chesapeake Lane	Miller-Holder	Plant No. 2	0.055 ^B
10	Scenario Diversion	4742 Scenario Drive	Knott	Plant No.1 & No. 2 [^]	0.035
11	1 st Street CDS	103 Pacific Coast Hwy	Coast	Plant No. 2	0.017 ^C
<i>Owned and Managed by the County of Orange</i>					
12	Greenville-Banning Channel	2501 Placentia Avenue	Interplant	Plant No. 2	0.011 ^D
13	Huntington Beach Channel	8092 Adams Avenue	Coast (via Delaware)	Plant No. 2	0.129
14	Santa Ana River	10844 Ellis Avenue	Sunflower	Plant No. 1	0.016 ^E
<i>Owned and Managed by Irvine Ranch Water District</i>					
15	Los Trancos Diversion	Pacific Coast Highway (Crystal Cove State Park)	South Coast	Plant No. 2	0.173
16	Muddy Canyon Diversion	Pacific Coast Highway (El Moro State Park)	South Coast	Plant No. 2	0.047
17	Peters Canyon Diversion	3001 Main Street	Main Street	Plant No. 1	0.369
<i>Owned and Managed by the City of Newport Beach</i>					
18	Newport Dunes Diversion (Gravity Flow)	1131 Back Bay Drive	South Coast (via Back Bay)	Plant No. 2	0.002 ^F
19	Big Canyon	15 Rue Verte Lane	South Coast (via Back Bay)	Plant No. 2	0.018 ^G
20	Mid Big Canyon	1951 Jamboree Road	South Coast (via Back Bay)	Plant No. 2	0.013 ^H
<i>Owned and Managed by PH Finance, LLC</i>					

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2020/21 Orange County Sanitation District, Resource Protection Division					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) ¹
21	Pelican Point Diversion	36 Pelican Point Drive	South Coast	Plant No. 2	0.008
Sum of the Average Daily Discharges (FY 2020/21)					1.518
*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.					
¹ MGD = million gallons per day					
^Scenario flows to Plant No. 1 and Plant No. 2 simultaneously due to Bushard-Ellis junction box.					
A. Indianapolis: System offline Nov (11-month average)					
B. Adams: System offline Nov – Dec (10-month average)					
C. 1 st Street CDS: System offline Dec (11-month average)					
D. Greenville: System online Jun for testing (1-month average)					
E. Santa Ana: System offline Aug (11-month average)					
F. Newport Dunes: System offline Jul, Dec – Mar, Jun (6-month average)					
G. Big Canyon: System offline Jul – Aug, Dec – Mar (6-month average)					
H. Mid Big Canyon: System offline Jul – Aug, Dec – Mar (6-month average)					

Table 9.5 summarizes several significant Dry Weather Urban Runoff Program statistics.

Table 9.5 Dry Weather Urban Runoff Diversion Program, FY 2020/21 Orange County Sanitation District, Resource Protection Division	
Number of new permits generated	0
Number of permitted diversions	21
Total average daily discharge	1.85 MGD
Monthly average daily discharge range	1.38 – 3.07 MGD
Newly proposed diversions	3
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 City of Newport Beach's Arches Diversion project consists of two diversions near the intersection of Newport Boulevard and Pacific Coast Highway. The project has already been vetted with the Orange County Stormwater Program TAC and is in the final construction stages. Prior to this reporting period, OC San's Engineering Planning Division worked with the City of Newport Beach on the diversion facility design specifications. In parallel and continuing through this FY 2020/21, OC San's Resource Protection Division has been working on the draft Agreement.

Despite long delays, construction on the Santa Ana-Delhi Channel Diversion in the City of Santa Ana is nearing completion. This past fiscal year, OC San worked with the County of Orange and the City of Santa Ana to facilitate discharge from the diversion for acceptance testing to confirm that the diversion has been constructed appropriately. OC San also worked with the County of Orange to ensure that the facility would be constructed in accordance with OC San requirements, including ensuring the facility has both a representative sample point and an in-situ hydraulically-calibrated effluent flow meter. In parallel, OC San staff continues to work with the County of Orange to finalize the Agreement to provide sewer service for the Santa Ana-Delhi Channel Dry Weather Urban Runoff Diversion discharge. Discharge has not yet

commenced from the Santa Ana-Delhi Channel Diversion. The Santa Ana-Delhi Channel Diversion is projected to add up to 1.94 MGD of flow 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. Additionally, modifications to the Newport Dunes diversion is also under consideration.

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. Ethylbenzene at 0.0214 mg/L was detected at the City of Huntington Beach Hamilton diversion. 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 with the exception of a single copper sample at 3.09 mg/L collected from the City of Huntington Beach's 1st Street CDS Unit diversion. This discharge was a minor violation of OC San's local copper discharge limit of 3.0 mg/L (i.e., less than 120% of the Technical Review Criteria) and subsequent monitoring demonstrated compliance with the copper discharge limit from the 1st Street CDS Unit diversion.

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.

Table 9.6 Dry Weather Urban Runoff Compliance, FY 2020/21 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 (< 0.05)	2.29	None
BOD	ND (< 2.0)	84	None
TSS	ND (< 0.6)	1230	None
Cadmium	ND (< 0.0002)	0.082	1.0
Chromium	ND (< 0.0002)	0.144	20.0
Copper	ND (< 0.0005)	3.09	3.0
Lead	ND (< 0.0002)	0.095	2.0
Molybdenum	ND (< 0.0001)	0.32	2.3
Nickel	ND (< 0.001)	0.155	10.0
Selenium	ND (< 0.0004)	0.0472	3.9
Zinc	ND (< 0.005)	6.83	10.0
Oil & Grease Min.	ND (< 0.96)	21	100.0
Sulfide (Dissolved)	ND (< 0.05)	ND (< 0.1)	0.5
Sulfide (Total)	ND (< 0.05)	3.98	5.0
Pesticides	ND (< 0.00005)	ND (< 0.00025)	0.01
Total Toxic Organics	ND (< 0.001)	0.0214	None
*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 fifth year in a row, Orange County's beaches have received very favorable ratings from Heal the Bay's annual report⁴. Summer Dry Grades were excellent and just below the five-year average with 96% of beaches receiving A or B grades. Wet weather grades were substandard and far lower than average with 42% of the beaches receiving A and B grades. Winter Dry Grades were stellar and higher than the five-year average with 96% of the beaches receiving A and B grades. A total of ten (10) beaches made it on the honor roll, which is more than any other county. Orange County received ten (10) inches of rain, which is higher than the historical average of nine (9) inches. The increase in rainfall did not appear to impact Wet Weather Grades⁴.

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 will 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 sixty (60) pounds of selenium were diverted from the bay during the FY 2020/21 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.

9.6 Dental Amalgam

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 municipal sewage treatment plants known as 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.

⁴ Heal the Bay. 2021. 2020-2021 Beach Report Card. Accessed from: <https://healthebay.org/beachreportcard2021/>

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) 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.

As required by the regulation, OC San implemented procedures for receiving, reviewing, and retaining dental office compliance reports. OC San conducted its first mass mailing to 922 dental offices in OC San's service area in January 2018, and a second mailing to over 1,700 offices in June 2020. Reminder notices and NOVs were sent to nonresponding dental offices in September and December 2020, respectively. As of the end of this reporting period OC San has received and processed 1,583 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.

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 2020/21
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)	1	0	0			
9W Halo Western opCo, L.P.	1-600378	1575 N. Case St, Orange, CA 92867	812332	403.5(d)	4	20	5		Published as SNC for reporting violation(s)	
A & G Electropolish	1-531422	18330 Ward St, Fountain Valley, CA 92708	332813	433.17(a)	4	19	8			
A & K Deburring and Tumbling, Inc.	1-511362	2008 S. Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	4	22	4			
A & R Powder Coating, Inc.	1-021088	1198 N. Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	4	18	8			
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	4	17	10			
Accurate Circuit Engineering	1-011138	3019 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	6	33	8			
Active Plating, Inc.	1-011115	1411 E. Pomona St, Santa Ana, CA 92705	332813	433.17(a)	4	30	60			
ADS Gold, Inc.	Z-321851	3843 E. Eagle Dr, Anaheim, CA 92807	331410	433.17(a)	1	0	0			
Advance-Tech Plating, Inc.	1-021389	1061 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	7	27	53	Chromium, Nickel, Zinc		Formerly listed as Advance Tech Plating
Advanced Plating Technology	Z-371321	1765 N. Batavia St, Orange, CA 92865	332813	433.17(a)	2	0	0			Zero Discharge Certification Deactivated
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave, Garden Grove, CA 92841	332722	403.5(d)	7	14	7			
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St, Garden Grove, CA 92841	332722	433.17(a), 471.65(e), 471.65(m), 471.65(n), 471.65(r), 471.65(s), 471.65(u), 471.65(w)	4	42	66			
Alex C. Fergusson	1-031186	8371 Monroe Ave, Stanton, CA 90680	325611	417.166, 417.176, 417.36	1	6	0			Class 1 Permit Deactivated

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Alex C. Fergusson, LLC, A Zep Company	1-601167	8371 Monroe Ave, Stanton, CA 90680	325611	417.166, 417.176, 417.36	3	21	3		Published as SNC for reporting violation(s)	New Class 1 Permit Issued
Alexander Oil Company	1-581185	19065 Stewart St, Huntington Beach, CA 92648	211111	403.5(d)	5	0	1			
All Metals Processing of O.C., Inc.	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	4	32	20			
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	4	48	10			
Allied Electronics Services, Inc.	1-011073	1342 E. Borchard Santa Ana, CA 92705	334412	433.17(a)	4	24	8			
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325612	417.166, 417.176, 417.66, 417.86	6	28	4			
Alloy Die Casting Co.	1-531437	6550 Caballero Blvd, Buena Park, CA 90620	331523	464.15(a), 464.15(b), 464.15(c), 464.15(h), 464.45(a), 464.45(b), 464.45(d)	5	27	12	Zinc	Published as SNC for reporting violation(s)	
Alloy Tech Electropolishing, Inc.	1-011036	2220 S. Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	4	22	8		Published as SNC for reporting violation(s)	
Alsco, Inc.	1-021656	1755 S. Anaheim Blvd, Anaheim, CA 92802	812331	403.5(d)	5	31	17	Oil & grease minerals		
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E. Alton Ave, Santa Ana, CA 92707	332112	467.46	4	27	22			
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Ave, Santa Ana, CA 92704	332112	467.45	5	22	10			
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	5	22	16			
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave, Santa Ana, CA 92704	332112	467.46	7	19	13	Oil & grease minerals		
American Circuit Technology, Inc.	1-021249	5330 E. Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	4	28	5			Class 1 Permit Deactivated
Amerimax Building Products, Inc.	1-021102	1411 N. Daly St, Anaheim, CA 92806	332812	465.35	4	22	8			

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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
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	6	24	0			
Ametek Aerospace, Inc.	Z-361006	17032 Armstrong Ave, Irvine, CA 92614	334511	433.17(a)	0	0	0			Zero Discharge Certification Deactivated
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	8	27	8	pH		
Anchen Pharmaceuticals, Inc. (Fairbanks)	1-541180	72 Fairbanks Irvine, CA 92618	325412	439.47	4	48	30			
Anchen Pharmaceuticals, Inc. (Goodyear)	1-600359	5 Goodyear Irvine, CA 92618	325412	439.47	6	37	20	pH		Class 1 Permit Deactivated
Anchen Pharmaceuticals, Inc. (Jeronimo)	1-541179	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	5	53	30			
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	5	19	20	Nickel		
AnoChem Coatings	1-600295	1102 East Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	5	30	12			
Anodyne, Inc.	1-511389	2230 S. Susan St, Santa Ana, CA 92704	332813	433.17(a)	4	26	30			
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	32	20			
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	7	36	60	Copper		
ARO Service	1-021192	1186 N. Grove St, Anaheim, CA 92806	336411	433.17(a)	4	20	8			
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 2020/21 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)	4	30	15			
Aseptic Technology, LLC (Corbit)	1-501002	24855 Corbit Pl, Yorba Linda, CA 92887	31193	403.5(d)	3	12	4	pH		
Aseptic Technology, LLC (Landon)	1-600716	4940 E. Landon Dr, Anaheim, CA 92807	31193	403.5(d)	7	0	3			Formerly listed as Aseptic Technology, LLC.
Astech Engineered Products, Inc. (Bldg. 1 & 2)	1-571295	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	4	30	8			
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)	2	0	0			
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	5	23	9			
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336413	433.17(a)	5	23	6			
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325414	439.17, 439.27	4	41	51	Acetone	Published as SNC for discharge violation(s)	

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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&B Enameling, Inc.	Z-331432	17591 Sampson Ln, Huntington Beach, CA 92647	332812	433.17(a)	0	0	0			
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.26, 463.36	4	25	10			
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	4	19	10			
B. Braun Medical, Inc. (West/Lake)	1-541183	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.16, 463.26, 463.36	4	20	10			
B/E Aerospace	Z-600654	3355 La Palma Ave, Anaheim, CA 92806	336413	433.17(a)	0	0	0			
Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	4	22	16			
Bazz Houston Co.	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	5	28	13	Oil & grease minerals		
Beckman Coulter, Inc.	1-521824	200 S. Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	4	18	8			
Beo-Mag Plating	1-511370	3313 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	23	29	CN		
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S. Placentia Ave, Placentia, CA 92870	311812	403.5(d)	5	22	4	pH		
Black Oxide Industries, Inc.	1-021213	1735 N. Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	5	27	8			
Blue Lake Energy	1-521785	5837 Casson Dr, Yorba Linda, CA 92886	211111	403.5(d)	4	17	4			
Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	6	24	4			
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	4	28	8			
Brasstech, Inc	1-600316	1301 E. Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	4	18	8			
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221112	403.5(d)	4	23	3			
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	403.5(d)	5	25	12			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
Bridgemark Corporation	1-521844	2930 E. Frontera St, A Unit, Anaheim, CA 92806	211111	403.5(d)	4	16	4			
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	403.5(d)	4	28	4			
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	4	29	4			
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	32	9	Oil & grease minerals		
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	29	4			
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)	5	54	120			
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	403.5(d)	4	20	4			
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	403.5(d)	4	20	4			
Burlington Engineering, Inc.	1-521770	220 W. Grove Ave, Orange, CA 92865	332811	433.17(a)	4	4	2			
Cadillac Plating, Inc.	1-021062	1147 W. Struck Ave, Orange, CA 92867	332813	433.17(a)	5	38	61			
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	29	24			
California Faucets	Z-331431	5271 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	0	0	0			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
California Gasket and Rubber Corporation	1-521832	533 W. Collins Ave, Orange, CA 92867	339991	428.66(a)	4	7	4			
Cargill, Inc.	1-031060	600 N. Gilbert St, Fullerton, CA 92833	311225	403.5(d)	5	24	24			
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	5	23	11	Oil & grease minerals		
CD Video, Inc.	1-511076	12650 Westminster Ave, Garden Grove, CA 92843	334613	433.17(a)	4	22	8			
Central Powder Coating	1-021189	593 Explorer St, Brea, CA 92821	332812	433.17(a)	4	26	8			
Ceradyne, Inc., a 3M Company	1-600691	17466 Daimler St, Irvine, CA 92614	339114	403.5(d)	3	9	2			Class 1 Permit Deactivated
Chromadora, Inc.	1-511414	2515 S. Birch St, Santa Ana, CA 92707	332813	433.17(a)	4	22	20			
Circuit Technology, Inc.	1-521821	1911 N. Main St, Orange, CA 92865	334112	433.17(a)	4	26	8			
City of Anaheim - Public Utilities Dept	1-021073	6751 E. Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	4	14	52			
City Of Anaheim - Public Utilities Dept.	1-521862	1144 N. Kraemer Blvd, Anaheim, CA 92806	221112	403.5(d)	4	0	0			
City of Anaheim Public Utilities (Water Services WRDF)	1-521843	210 S. Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	4	10	0			
City of Anaheim, Canyon Power Plant	1-600296	3071 E. Miraloma Ave, Anaheim, CA 92806	221121	403.5(d)	4	23	2			
City of Huntington Beach Fire Department	1-111015	19081 Huntington St, Huntington Beach, CA 92648	211111	403.5(d)	4	17	4			
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	403.5(d)	4	21	24			
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	6	26	12			
City of Tustin Water Service (17Th St.)	1-071013	18602 E.17th St, Tustin, CA 92705	221310	403.5(d)	4	21	2			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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, Water Service (Main St)	1-071268	235 E. Main St, Tustin, CA 92780	221310	403.5(d)	2	0	0			
CJ Foods Manufacturing Corp.	1-521849	500 State College Blvd, Fullerton, CA 92831	311824	403.5(d)	6	25	12	pH		
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	34	23	Copper	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)	8	19	3		Published as SNC for reporting violation(s)	
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	4	28	12			
Coca-Cola Company - Anaheim Water Plant	1-021392	2121 E. Winston Rd, Anaheim, CA 92806	312112	403.5(d)	3	8	1			Class 1 Permit Deactivated
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, Yorba Linda, CA 92886	211111	403.5(d)	6	11	6	Oil & grease minerals		
Continuous Coating Corporation	1-021290	520 W. Grove Ave, Orange, CA 92865	332812	433.17(a), 465.15	5	28	20	Zinc		
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	403.5(d)	5	31	6	Oil & grease minerals	Published as SNC for reporting violation(s)	
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	7	22	12	pH		
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	5	18	16			
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	7	18	7			
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	26	8	Nickel		
CRH California Water, Inc.	1-011051	502 S. Lyon St, Santa Ana, CA 92701	561990	403.5(d)	2	11	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Custom Enamellers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	4	25	12			
Cytec Engineered Materials, Inc.	Z-600005	1440 N. Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	2	0	0			
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W. Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	5	17	4			
Dae Shin USA, Inc.	1-031102	610 N. Gilbert St, Fullerton, CA 92833	313310	403.5(d)	4	22	0			
DAH Oil, LLC	1-581173	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	21	4			
Darling International, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	4	27	12			
Data Aire, Inc. #2	1-021379	230 W. Blueridge Ave, Orange, CA 92865	332322	433.17(a)	5	26	8			
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	4	25	13	Copper		
Data Solder, Inc.	1-521761	2915 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	22	8			
Dayton Flavors, LLC	1-600038	580 S. Melrose Placentia, CA 92870	311930	403.5(d)	4	12	4			
DCOR, LLC	1-111013	4541 Heil Ave, Huntington Beach, CA 92649	211111	403.5(d)	4	29	8			
Derm Cosmetic Labs, Inc.	Z-600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	0	0	0			
Diamond Environmental Services, LP	1-600244	1801 Via Burton None, B Unit, Fullerton, CA 92832	532490	403.5(d)	6	24	4	pH	Published as SNC for reporting violation(s)	
DNR Industries, Inc.	Z-601019	1562 S. Anaheim Blvd, 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)	8	25	4	pH		
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	4	16	10			
DS Services of America	1-021393	1522 N. Newhope St, Santa Ana, CA 92703	312112	403.5(d)	4	18	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

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Ducommun Aerostructures, Inc.	1-021105	1885 N. Batavia St, Orange, CA 92865	336413	433.17(a)	6	34	28			
Dunham Metal Plating Inc.	1-601023	1764 N. Case St, Orange, CA 92865	332813	433.17(a)	4	30	20		Published as SNC for reporting violation(s)	
Dunham Metal Processing	1-021325	936 N. Parker St, Orange, CA 92867	332813	433.17(a)	4	25	8			
E&B Natural Resources-Angus Petroleum Corporation	1-600254	1901 California St, Huntington Beach, CA 92648	211111	403.5(d)	5	21	8			
Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	5	23	6			
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)	4	18	8			
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	5	36	33	Cadmium		
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	10	24	59			
Electron Plating Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	4	30	20	Chromium		
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	4	28	20	Nickel		
Electrorack Products Co., Inc.	Z-321092	1443 S. Sunkist St, Anaheim, CA 92806	332999	433.17(a)	0	0	0			Zero Discharge Certification Deactivated
Embee Processing (Anodize)	1-600456	2148 S. Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 433.17(a)	4	27	16			
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	27	16			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Excello Circuits Manufacturing Corp.	1-521855	1924 Nancita Cir, Placentia, CA 92870	334412	433.17(a)	5	22	47			Class 1 Permit Deactivated
Excello Circuits, Inc. (Hunter)	1-601356	5330 E. Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	0	0	7			New Class 1 Permit Issued
Expo Dyeing and Finishing, Inc.	1-031322	1365 Knollwood Cir, Anaheim, CA 92801	313310	403.5(d)	4	23	0			
Fabrica International, Inc.	1-011278	3201 S. Susan St, Santa Ana, CA 92704	314110	403.5(d)	5	20	0			
Fabrication Concepts Corporation	1-011068	1800 E. St. Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	5	30	18			
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	4	29	8			
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)	5	32	70			
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	5	61	9			
Fullerton Custom Works, Inc.	Z-331424	1165 E. Elm Ave, Fullerton, CA 92831	332813	433.17(a)	2	0	0			
Gaffoglio Family Metalcrafters	1-600443	11161 Slater Ave, Fountain Valley, CA 92708	336111	426.66	4	21	2			
Gallade Chemical, Inc.	1-011257	1230 E. Saint Gertrude Pl, Santa Ana, CA 92707	422690	403.5(d)	4	19	4			
Gemini Industries, Inc.	1-071172	2311 S. Pullman St, Santa Ana, CA 92705	331492	415.26, 421.266(b), 421.266(e), 421.266(i), 421.266(j), 421.266(m), 421.266(n)	4	36	18			
Gemtech Coatings	Z-600544	2737 S. Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	1	0	0			
General Container Corporation	1-031042	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	2	8	1			Class 1 Permit Deactivated

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	4	21	4			
Golden State Pumping LLC	1-600975	1051 N. Patt St, Anaheim, CA 92801	562219	403.5(d)	17	28	0	pH	Published as SNC for reporting violation(s)	Class 1 Permit Deactivated
Gomtech Electronics, Inc.	1-021352	990 N. Enterprise St, M Unit, Orange, CA 92867	334412	433.17(a)	5	26	8			
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	403.5(d)	4	32	16			
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	4	21	4	pH		
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336370	433.17(a)	6	31	22	Zinc		
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			
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	403.5(d)	4	24	6			
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	5	23	48		Published as SNC for reporting violation(s)	
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell Orange, CA 92865	332813	433.17(a)	4	34	20			
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	5	34	60	Copper		
House Foods America Corporation (East)	1-600906	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	4	21	0			
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave, Garden Grove, CA 92841	311224	403.5(d)	4	21	0			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
Howmet Global Fastening Systems Inc.	1-021081	800 S. State College Blvd, Fullerton, CA 92831	332722	433.15(a), 433.17(a), 467.46, 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(w), 471.65(x)	5	54	38	CN		
Hyatt Die Casting & Engineering Corp.	Z-331236	4656 Lincoln Ave, Cypress, CA 90630	331523	464.16(a), 464.16(c)	1	0	0			
Ideal Anodizing, Inc.	1-021041	1250 & 1270 N. Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	4	26	8			
Ikon Powder Coating, Inc.	1-521756	1375 N. Miller St, Anaheim, CA 92806	332812	433.17(a)	4	18	8			
Image Technology, Inc.	1-521755	1380 N. Knollwood Cir, Anaheim, CA 92801	325611	417.86	5	10	4			
Imperial Plating	1-031106	2007 Raymer Ave, N Ste, Fullerton, CA 92833	332813	433.17(a)	11	29	30	Cadmium, Zinc		Class 1 Permit Deactivated
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	403.5(d)	6	23	4			
Independent Forge Company	Z-601008	692 N. Batavia St, Orange, CA 92868	332112	467.45	2	0	0			
Industrial Coating, INC	Z-601061	2990 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	2	0	0			
Industrial Metal Finishing, Inc.	1-521828	1941 Petra Ln, Placentia, CA 92870	332813	403.5(d)	4	16	7			
Intec Products, Inc.	1-021399	1145 N. Grove St, Anaheim, CA 92806	314999	403.5(d)	4	24	4			
Integral Aerospace, LLC	1-600243	2036 E. Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	5	22	23			
International Paper Company (Anaheim)	1-521820	601 E. Ball Rd, Anaheim, CA 92805	322211	403.5(d)	5	26	8			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	4	21	3		Published as SNC for reporting violation(s)	
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	5	6	4			
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	4	13	4			
Irvine Ranch Water District - DATS	1-011075	1704 W. Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	4	20	4			
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear None, Irvine, CA 92618	339112	403.5(d)	3	13	2			New Class 1 Permit Issued
J & R Metal Finishing Co.	1-521823	307 N. Euclid Way, H1 Bldg, Anaheim, CA 92801	332812	403.5(d)	4	24	6			
J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Unit, Newport Beach, CA 92663	336611	403.5(d)	5	7	6			
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	5	32	20			
Jellco Container, Inc.	1-021402	1151 N. Tustin Ave, Anaheim, CA 92807	322212	403.5(d)	4	20	6			
John A. Thomas- Bolsa Oil	1-031065	18701 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	4	33	8			
Joint Forces Training Base, Los Alamitos	1-031270	Orangewood Gate, Northwest Corner of the Base Los Alamitos, CA 90720	928110	403.5(d)	4	21	2			
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	5	21	9			
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N. Anaheim Blvd, Anaheim, CA 92801	423930	403.5(d)	4	17	8			
Kirkhill, Inc. (North)	1-600608	300 E. Cypress St, Brea, CA 92821	339991	428.76(a)	4	25	8			
Kirkhill, Inc. (South)	1-600609	300 E. Cypress St, Brea, CA 92821	339991	428.76(a)	4	24	8			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	5	22	4			
Kryler Corporation	1-021428	1217 E. Ash Ave, Fullerton, CA 92831	332813	413.14(b), 413.14(f), 433.17(a), 433.17(b)	6	32	8			
Kyocera Precision Tools, Inc.	1-511385	3565 Cadillac Ave, Costa Mesa, CA 92626	333515	403.5(d)	4	17	4			
La Habra Bakery	1-031029	850 S. Cypress St, La Habra, CA 90631	311812	403.5(d)	6	22	11			
La Habra Plating Company	Z-331399	900 S. Cypress 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	2	16	5			New Class 1 Permit Issued
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	22	12			
Linco Industries, Inc.	1-021253	528 S. Central Park Ave, West Dir, Anaheim, CA 92802	332812	433.17(a)	6	37	11	Molybdenum		
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	6	24	20	CN		
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	15	1			
M.S. Bellows	1-111007	5322 Mcfadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	5	22	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	335311	433.17(a)	4	22	8			
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	6	20	6			
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E. Rossllyn Ave, Fullerton, CA 92831	322211	403.5(d)	4	17	7			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Markland Manufacturing, Inc.	1-011046	1111 E. McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	4	35	28			
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)	5	15	5			
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, Irvine, CA 92618	311824	403.5(d)	4	12	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 St, Santa Ana, CA 92707	811192	403.5(d)	4	14	4			
McKenna Labs, Inc.	1-021422	1601 E. Orangethorpe Ave, Fullerton, CA 92831	325620	417.86	5	23	7	Zinc		
MCP Foods, Inc.	1-021029	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	6	15	0			
Meggitt (Orange County), Inc.	1-601115	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	4	17	10	Lead, Silver		New Class 1 Permit Issued
Meggitt, Inc.	1-600006	14600 Myford Rd, Irvine, CA 92606	334519	433.17(a)	0	0	0			Class 1 Permit Deactivated
Merical, LLC	1-600655	233 E. Bristol Ln, Orange, CA 92865	325412	439.47	4	25	14			
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	5	17	8			
Micrometals, Inc.	1-021153	5615 E. La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	6	27	6	pH		
Murrietta Circuits	1-521811	5000 E. Landon St, Anaheim, CA 92807	334412	433.17(a)	4	26	8			
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	4	21	4			
National Construction Rentals	1-600652	1550 E. Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	4	21	3	pH	Published as SNC for reporting violation(s)	
Neutron Plating, Inc.	Z-321812	2993 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	2	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Neutronic Stamping and Plating	1-521772	10535 Lawson River Ave, Fountain Valley, CA 92708	334417	433.17(a)	4	14	8			Class 1 Permit Deactivated
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	403.5(d)	12	28	9	Copper		
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	4	18	1			
Newport Fab, LLC (dba TowerJazz Semiconductor)	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	4	24	2			
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	4	22	12			
Nor-Cal Beverage Co., Inc. (Main)	1-021284	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	5	22	0			
Nor-Cal Beverage Co., Inc. (NCB)	1-021283	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	5	22	0	pH		
Nu-Tec Powder Coating	Z-321383	2990 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			Zero Discharge Certification Deactivated
O'Donnell Oil Company, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	403.5(d)	4	9	0			
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 Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	4	0	0			
Omni Metal Finishing, Inc.	1-021520	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	5	26	20			
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley River, Fountain Valley, CA 92708	332813	433.17(a)	8	20	10	Cadmium		
Only Cremations for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	4	14	4			New Class 1 Permit Issued

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	4	13	3			
Orange County Chemical Supply, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	4	23	4			
Ortronics, Inc.	Z-601203	1443 S. Sunkist St, Anaheim, CA 92806	332999	433.17(a)	1	0	0			New Zero Discharge Certification Issued
Pacific Chrome Services	Z-311396	603 E. Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	2	0	0			
Pacific Image Technology, Inc.	1-021070	1875 S. Santa Cruz St, Anaheim, CA 92805	334112	433.17(a)	4	25	8			
Pacific Western Container	1-511371	4044 W. Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	4	18	4	Molybdenum		
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	1	0	0			
Patio and Door Outlet, Inc.	1-521783	410 W. Fletcher Ave, Orange, CA 92865	332812	433.17(a)	3	13	0		Published as SNC for reporting violation(s)	Class 1 Permit Deactivated
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W. Freedom Ave, Orange, CA 92865	562219	437.47(b)	4	32	40			
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W. Freedom Ave, Orange, CA 92865	562219	403.5(d)	4	21	14			
Performance Powder, Inc.	1-521805	2920 E. La Jolla St, Anaheim, CA 92806	332812	433.17(a)	4	26	8	Zinc	Published as SNC for discharge violation(s)	
Petroprize Corporation	1-581180	319 20th St, Huntington Beach, CA 92648	211111	403.5(d)	4	17	4			
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	2	13	4			
Pioneer Circuits, Inc.	1-011262	3010 S. Shannon St, Santa Ana, CA 92704	334412	433.17(a)	4	25	20	Lead		
Platinum Surface Coating, Inc.	1-521852	1173 N. Fountain Way, Anaheim, CA 92806	332813	433.17(a)	4	18	8	Nickel	Published as SNC for reporting violation(s)	
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)	4	17	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 2020/21 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)	2	0	0			
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N. Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	6	19	8			
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N. Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	5	18	8	Zinc		
PowderCoat Services, LLC. Plant 5	1-600355	1747 W. Lincoln Ave, L1 Unit, Anaheim, CA 92801	332812	433.17(a)	3	16	6			New Class 1 Permit Issued
Power Distribution, Inc.	1-511400	4011 W. Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	4	23	4			
Powerdrive Oil & Gas Company, LLC (16th)	1-600246	613 16th St, Huntington Beach, CA 92648	211111	403.5(d)	3	0	0			Class 1 Permit Deactivated
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	120 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	4	16	4			
Powerdrive Oil & Gas Company, LLC (Surveyor)	1-600245	21632 Surveyor Cir, Huntington Beach, CA 92646	211111	403.5(d)	3	0	0			Class 1 Permit Deactivated
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	4	37	8			
Precision Anodizing & Plating, Inc.	1-521809	1601 N. Miller St, Anaheim, CA 92806	332813	433.17(a)	4	28	20			
Precision Circuits West, Inc.	1-011008	3310 W. Harvard St, Santa Ana, CA 92704	334412	433.17(a)	4	26	8			
Precision Resource, California Division	1-111002	5803 Engineer St, 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	24	21			
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	4	19	4			
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	5	24	8			
Pulmuone Foods USA, Inc. (West)	1-531397	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	4	21	0			Formerly listed as Pulmuone Widlwood, Inc.

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Q-Flex Inc.	1-600337	1301 E. Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	5	24	8	Copper, Silver		
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N. Cypress St, Orange, CA 92867	332112	467.45	7	28	7			
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N. Cypress St, Orange, CA 92867	332112	467.46	5	30	8	pH	Published as SNC for reporting violation(s)	
Quikturn Professional Screenprinting	1-521858	567 S. Melrose St, Placentia, CA 92870	333249	403.5(d)	4	20	6			
Rainbow Disposal Co., Inc. (Building A)	1-601086	17121 Nichols Ln, Huntington Beach, CA 92647	562111	403.5(d)	1	0	0			Class 1 Permit Deactivated
Rainbow Disposal Co., Inc. (Building F)	1-601087	17121 Nichols Ln, Huntington Beach, CA 92647	562111	403.5(d)	3	7	2			Class 1 Permit Deactivated
Rayne Dealership Corporation	1-571303	17835 Sky Park Cir, M Ste, Irvine, CA 92614	454390	403.5(d)	4	21	2			
RBC Transport Dynamics Corp.	1-011013	3131 W. Segerstrom Ave, Santa Ana, CA 92704	336413	433.17(a)	4	22	19			
Republic Waste Services	1-521827	2727 Coronado St, Anaheim, CA 92806	56211	403.5(d)	5	28	13		Published as SNC for reporting violation(s)	
Republic Waste Services of So. Cal., LLC	1-021169	1235 N. Blue Gum St, Anaheim, CA 92806	562111	403.5(d)	7	29	4	pH	Published as SNC for reporting violation(s)	
Rich Products Corporation (North)	1-601022	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	20	4			
Rich Products Corporation (South)	1-511404	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	20	4			
Rigiflex Technology, Inc.	1-021187	1166 N. Grove St, Anaheim, CA 92806	334418	433.17(a)	4	23	8			
Robinson Pharma, Inc. (Croddy)	1-511413	2632 S. Croddy Way, Santa Ana, CA 92704	325411	439.47	5	0	0			
Robinson Pharma, Inc. (Harbor North)	1-600126	2811 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	4	24	8		Published as SNC for reporting violation(s)	
Robinson Pharma, Inc. (Harbor South)	1-511412	3330 S. Harbor Blvd, Santa Ana, CA 92704	325411	439.47	6	27	14			
Rolls-Royce HTC	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	5	12	4			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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
Rolls-Royce HTC (fume scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	5	14	2			
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 LotBik, Huntington Beach, CA 92648	211111	403.5(d)	4	17	4			
RP Finishing	Z-601358	1226 E. Ash Ave, Fullerton, CA 92831	332812	433.17(a)	0	0	0			New Zero Discharge Certification Issued
RSS Manufacturing	Z-600635	1275 Logan Ave, Costa Mesa, CA 92626	332913	433.17(a)	1	0	0			
S & C Oil Co., Inc.	1-581175	18742 Goldenwest St, Huntington Beach, CA 92649	211111	403.5(d)	4	21	3			
Safety-Kleen Systems, Inc.	1-600690	2170 S. Yale St, Santa Ana, CA 92704	562211	403.5(d)	2	9	2			New Class 1 Permit Issued
Safran Electronics & Defense, Avionics USA, LLC.	1-571304	3184 Pullman St, Costa Mesa, CA 92626	335931	403.5(d)	6	29	15			
Sanitor Corporation	1-601267	8400 Cerritos Ave, Stanton, CA 90680	325620	417.86, 439.47	1	0	0			New Class 1 Permit Issued
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	33	20			
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	28	20			
Santana Services	1-021016	1224 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	4	18	8			
Schreiber Foods, Inc.	1-021049	1901 Via Burton None, Fullerton, CA 92831	311511	403.5(d)	7	13	0			Class 1 Permit Deactivated
Scientific Spray Finishes, Inc.	1-031311	315 S. Richman Ave, Fullerton, CA 92832	332812	433.17(a)	4	29	8			
Semicoa	1-571313	333 McCormick Ave, Costa Mesa, CA 92626	334413	469.18(a)	4	24	10			
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	5	6	7			
SFPP, LP	1-021619	1350 N. Main St, Orange, CA 92867	493190	403.5(d)	6	13	6			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Shepard Bros., Inc.	1-031034	503 S. Cypress St, La Habra, CA 90631	325611	417.166, 417.176	4	30	4			
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332722	433.17(a)	5	0	0			
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	5	21	12			
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	5	19	9			
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	5	26	21	Nickel		
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	5	21	4			
South Coast Circuits, Inc. (Bldg 3500 A)	1-011069	3500 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	4	33	20			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3506 A)	1-011030	3506 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	4	25	8			
South Coast Circuits, Inc. (Bldg 3512 A)	1-511365	3512 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	4	36	20			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3524 A)	1-011054	3524 W. Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	4	33	8			
South Coast Water	1-511405	401 S. Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	4	20	6			
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	15	2			
Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	15	2			
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	15	2			
Spectrum Paint And Powder, Inc.	Z-321822	1332 S. Allec St, Anaheim, CA 92805	332812	433.17(a)	0	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	4	24	8			
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	37	Cadmium		
Stainless Micro-Polish, Inc.	1-021672	1286 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	4	30	12			
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W. Collins Ave, Orange, CA 92867	332119	403.5(d)	10	30	66	Oil & grease minerals		
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	8	18	9			
Statek Corporation (Gold/Nickel Plating)	Z-600201	512 N. Main St, Orange, CA 92868	334419	403.5(d)	0	0	0			Zero Discharge Certification Deactivated
Statek Corporation (Main)	1-021664	512 N. Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	4	25	6			
Statek Corporation (Orange Grove)	1-521777	1449 W. Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	4	26	2			
Stepan Company	1-021674	1208 N. Patt St, Anaheim, CA 92801	325613	417.106, 417.96	6	19	11			

APPENDIX A

LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21 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	21	0			
Summit Interconnect, Inc.	1-600012	223 N. Crescent Way, Anaheim, CA 92801	334412	433.17(a)	5	34	20			
Summit Interconnect, Inc., Orange Division	1-600060	230 W. Bristol Ln, Orange, CA 92865	334412	433.17(a)	4	30	20			
Sunny Delight Beverages Co.	1-021045	1230 N. Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	6	20	0			
Superior Plating	1-021090	1901 E. Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	4	24	70	CN		
Superior Processing	1-021403	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	4	22	12			
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	4	18	8			
Taylor-Dunn Manufacturing Company	1-021123	2114 Ball Rd, Anaheim, CA 92804	333924	433.17(a)	5	28	8			
Teva Parenteral Medicines, Inc.	1-141007	19 Hughes Irvine, CA 92618	325412	439.47	5	22	5			
Thermal-Vac Technology, Inc.	1-021282	1221 W. Struck Ave, Orange, CA 92867	332410	433.17(a)	4	27	21			
Thompson Energy Resources, LLC	1-521773	3351 E. Birch St, Brea, CA 92821	211111	403.5(d)	4	0	0			
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	336412	433.17(a)	4	21	10			
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20			
Toyota Racing Development	1-071059	335 Baker St, Costa Mesa, CA 92626	336310	403.5(d)	5	19	13			
Transline Technology, Inc.	1-021202	1106 S. Technology Cir, Anaheim, CA 92805	334412	433.17(a)	5	26	8			
Tropitone Furniture Co., Inc.	1-141163	5 Marconi Irvine, CA 92618	337124	433.17(a)	5	28	8			
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St, Anaheim, CA 92806	334412	433.17(a)	6	31	20	Copper		

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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
TTM Technologies North America, LLC. (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	4	37	20			
TTM Technologies North America, LLC. (Harbor)	1-511359	2640 S. Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	4	29	24			
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	403.5(d)	4	20	4			
Universal Alloy Corp.	1-021706	2871 La Mesa Ave, Anaheim, CA 92806	331318	467.35(c)	1	0	0			Class 1 Permit Deactivated
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	4	29	8			
US Display Group, Inc.	1-601226	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	2	5	1			
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	4	20	0			
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St, Anaheim, CA 92806	423930	403.5(d)	8	0	1		Published as SNC for reporting violation(s)	
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	1	0	0			
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325411	439.47	5	63	14			
Weartech	Z-600242	1177 N. Grove St, Anaheim, CA 92806	333992	403.5(d)	4	0	0			Zero Discharge Certification Deactivated
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	3	15	4			
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	1260 N. Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	2	11	2			New Class 1 Permit Issued
Weidemann Water Conditioners, Inc. (Fullerton)	1-021653	1702 E. Rossllynn Ave, Fullerton, CA 92831	333318	403.5(d)	4	21	4			
West Newport Oil Company	1-061110	1080 W.17th St, Costa Mesa, CA 92627	211111	403.5(d)	4	20	7			
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	403.5(d)	4	28	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2020/21
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 (Brea)	1-031035	660 N. Puente St, Brea, CA 92821	334412	433.17(a)	4	30	8	Copper		
Winonics, Inc.	1-021735	1257 State College Blvd, Fullerton, CA 92831	334412	433.17(a)	4	23	20			
Yakult USA, Inc.	1-521850	17235 Newhope St, Fountain Valley, CA 92708	311511	403.5(d)	4	21	12			

Appendix B. Summary of Priority Pollutants and Trace Constituents Analyses

APPENDIX B
PRIORITY POLLUTANTS ANALYSES SUMMARY FY 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Analysis	Total Average Concentration	Unit	Flow (MGD)	Mass (lb/d)
EFF-001	As	3.2	µg/L	91.24	2.43501312
	CN	4.01	µg/L	91.24	3.05137582
	Cr	1.27	µg/L	91.24	0.96639583
	Cu	4.84	µg/L	91.24	3.68295734
	Hg	4.2167	ng/L	91.24	0.00320866
	Ni	8.64	µg/L	91.24	6.57453542
	ORG	18.9085	µg/L	91.24	14.3882642
	Pb	0.558	µg/L	91.24	0.42460541
	Sb	1.27	µg/L	91.24	0.96639583
	Se	7.01	µg/L	91.24	5.33420062
	Zn	27.4	µg/L	91.24	20.8497998
INF-001	Ag	0.82	µg/L	118.12	0.80779906
	As	2.59	µg/L	118.12	2.55146287
	CN	1.27	µg/L	118.12	1.25110342
	Cd	0.314	µg/L	118.12	0.30932793
	Cr	6.22	µg/L	118.12	6.12745138
	Cu	89.9	µg/L	118.12	88.5623599
	Hg	125.9167	ng/L	118.12	0.12404316
	Ni	11.4	µg/L	118.12	11.2303771
	ORG	49.3	ng/L	118.12	0.04856646
	ORG	33.197	µg/L	118.12	32.7030552
	Pb	2.53	µg/L	118.12	2.49235562
	Sb	1.23	µg/L	118.12	1.21169858
	Se	2.6	µg/L	118.12	2.56131408
	Zn	159	µg/L	118.12	156.634207
INF-002	Ag	0.498	µg/L	64.36	0.26730768
	As	4.16	µg/L	64.36	2.23293158
	CN	1.81	µg/L	64.36	0.97153994
	Cd	0.522	µg/L	64.36	0.28018997
	Cr	6.75	µg/L	64.36	3.6231462
	Cu	59.1	µg/L	64.36	31.7226578
	Hg	77.25	ng/L	64.36	0.0414649
	Ni	8.25	µg/L	64.36	4.4282898
	ORG	17.457	µg/L	64.36	9.37026122
	Pb	3.01	µg/L	64.36	1.61565482
	Sb	1.07	µg/L	64.36	0.57433577
	Se	7.18	µg/L	64.36	3.85395403
	Zn	119	µg/L	64.36	63.8747256

Notes:

MGD million gallons per day
lb/d pounds per day
µg/L micrograms per liter
ng/L nanograms per liter

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	3.14	µg/L	3.58	µg/L	2.64	µg/L	3.35	µg/L	3.22	µg/L	3	µg/L	2.98	µg/L	3.33	µg/L	3.34	µg/L	3.07	µg/L	3.18	µg/L	3.51	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cyanide	4.48	µg/L	3.56	µg/L	2.26	µg/L	5.41	µg/L	3.84	µg/L	3.39	µg/L	4.7	µg/L	3.65	µg/L	5.46	µg/L	3.71	µg/L	2.69	µg/L	4.98	µg/L
	Chromium	1.14	µg/L	1.3	µg/L	1	µg/L	1.04	µg/L	2.01	µg/L	1.12	µg/L	1.25	µg/L	1.23	µg/L	1.31	µg/L	1.54	µg/L	1.13	µg/L	1.17	µg/L
	Copper	3.83	µg/L	3.22	µg/L	3.2	µg/L	2.87	µg/L	3.02	µg/L	4.18	µg/L	6.55	µg/L	6.51	µg/L	6.43	µg/L	9.91	µg/L	5.13	µg/L	3.24	µg/L
	Mercury	6.3	ng/L	4.3	ng/L	3	ng/L	3.9	ng/L	4.2	ng/L	3.9	ng/L	4.9	ng/L	4.6	ng/L	3.6	ng/L	3.8	ng/L	4.1	ng/L	4	ng/L
	Nickel	6.73	µg/L	7.09	µg/L	5.36	µg/L	7.3	µg/L	10.2	µg/L	8.38	µg/L	8.11	µg/L	8.83	µg/L	12	µg/L	9.52	µg/L	10.5	µg/L	9.68	µg/L
	1,1,1-Trichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1,2,2-Tetrachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1,2-Trichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1-Dichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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-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	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-Dichloropropane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,3-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	pg/L					ND	pg/L					ND	pg/L					ND	pg/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	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	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	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	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	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
EFF-001	Aldrin	ND	µg/L					ND	µg/L				
	Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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
	Benzidine	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	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
	Benzo (k) Fluoranthene	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
	Chlordane	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
	Di-n-Butyl Phthalate	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	ND	µg/L	ND	µg/L	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
	Dieldrin	ND	µg/L						ND	µg/L			
	Diethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L						ND	µg/L			
	Endosulfan I	ND	µg/L						ND	µg/L			
	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	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	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L						ND	µg/L			
	Hexachlorobenzene	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	ND	µg/L	ND	µg/L
	Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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
	Isophorone	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
PCB - 1016	ND	µg/L						ND	µg/L				
PCB - 1221	ND	µg/L						ND	µg/L				
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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21												
EFF-001	PCB - 1254	ND	µg/L																						
	PCB - 1260	ND	µg/L																						
	Pentachlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	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												
	Phenol	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Acrolein	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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												
	Alpha-BHC	ND	µg/L																						
	Benzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Beta-BHC	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												
	Bis (2-Chloroethyl) Ether	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	ND	µg/L	ND	µg/L	ND	µg/L												
	Bromodichloromethane	5.61	µg/L	11.2	µg/L	ND	µg/L	12.6	µg/L	15.7	µg/L	4.05	µg/L	3.28	µg/L	4.53	µg/L	5.21	µg/L	7.24	µg/L	4.98	µg/L	2.61	µg/L
	Bromoform	ND	µg/L	ND	µg/L	ND	µg/L	1.55	µg/L	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	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	ND	µg/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	µg/L
	Chloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chloroform	10.4	µg/L	16.4	µg/L	0.85	µg/L	15.8	µg/L	14.5	µg/L	7.05	µg/L	6.89	µg/L	8.07	µg/L	7.57	µg/L	10.3	µg/L	8.69	µg/L	6.66	µg/L
	cis-1,3-Dichloropropene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Delta-BHC	ND	µg/L																						
	Dibromochloromethane	2.61	µg/L	5.01	µg/L	ND	µg/L	7.25	µg/L	8.58	µg/L	ND	µg/L	ND	µg/L	1.69	µg/L	2.03	µg/L	3.1	µg/L	1.77	µg/L	ND	µg/L
	Ethylbenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Gamma-BHC	ND	µg/L																						
	Methylene Chloride	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodipropylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDD	ND	µg/L																						
	4,4'-DDE	ND	µg/L																						
	4,4'-DDT	ND	µg/L																						
	Tetrachloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Toluene	ND	µg/L	ND	µg/L	ND	µg/L	0.48	µg/L	ND	µg/L	0.33	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	trans-1,2-Dichloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	Vinyl Chloride	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Lead	0.81	µg/L	0.65	µg/L	0.66	µg/L	0.62	µg/L	0.48	µg/L	0.77	µg/L	0.29	µg/L	0.68	µg/L	0.42	µg/L	0.96	µg/L	0.36	µg/L	ND	µg/L
	Antimony	1.44	µg/L	1.39	µg/L	1.07	µg/L	1.26	µg/L	1.47	µg/L	1.37	µg/L	1.23	µg/L	1.21	µg/L	1.19	µg/L	1.25	µg/L	1.43	µg/L	0.94	µg/L
	Selenium	6.81	µg/L	7.29	µg/L	6.3	µg/L	6.95	µg/L	7.74	µg/L	6.19	µg/L	6.06	µg/L	6.23	µg/L	6.28	µg/L	7.03	µg/L	6.75	µg/L	10.5	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	28.3	µg/L	26.1	µg/L	17.8	µg/L	24	µg/L	29	µg/L	26.9	µg/L	31.8	µg/L	31.9	µg/L	34.6	µg/L	27.1	µg/L	27.8	µg/L	23.5	µg/L
INF-001	Silver	0.7	µg/L	0.46	µg/L	0.8	µg/L	1.25	µg/L	0.61	µg/L	0.72	µg/L	0.71	µg/L	0.76	µg/L	1.08	µg/L	0.65	µg/L	0.87	µg/L	1.23	µg/L
	Arsenic	2.6	µg/L	2.2	µg/L	3.04	µg/L	2.69	µg/L	2.38	µg/L	2.54	µg/L	2.47	µg/L	2.68	µg/L	2.58	µg/L	2.71	µg/L	2.63	µg/L	2.54	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	0.38	µg/L	0.27	µg/L	0.31	µg/L	0.32	µg/L	0.27	µg/L	0.35	µg/L	0.28	µg/L	0.31	µg/L	0.3	µg/L	0.31	µg/L	0.34	µg/L	0.33	µg/L
	Cyanide	1.83	µg/L	ND	µg/L	1.71	µg/L	2.08	µg/L	1.92	µg/L	ND	µg/L	0.282	µg/L	ND	µg/L	2.13	µg/L	0.197	µg/L	2.3	µg/L	2.79	µg/L
	Chromium	5.79	µg/L	5.03	µg/L	6.98	µg/L	5.06	µg/L	6.64	µg/L	11.5	µg/L	5.12	µg/L	4.81	µg/L	7.24	µg/L	5.5	µg/L	5.24	µg/L	5.69	µg/L
	Copper	97.8	µg/L	84.3	µg/L	135	µg/L	89.5	µg/L	77.9	µg/L	93.6	µg/L	83	µg/L	86.7	µg/L	83.1	µg/L	84	µg/L	81.1	µg/L	83.2	µg/L
	Mercury	110	ng/L	130	ng/L	180	ng/L	160	ng/L	110	ng/L	110	ng/L	110	ng/L	140	ng/L	81	ng/L	100	ng/L	140	ng/L	140	ng/L
	Nickel	12.7	µg/L	7.82	µg/L	11.8	µg/L	9.36	µg/L	15	µg/L	22.1	µg/L	8.03	µg/L	11.3	µg/L	10.7	µg/L	8.41	µg/L	9.5	µg/L	10.2	µg/L
	1,1,1-Trichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1,2,2-Tetrachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1,2-Trichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,1-Dichloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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-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	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-Dichloropropane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,3-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	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	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-Chloronapthalene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	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	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

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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-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	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	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										
	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	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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) 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	ND	µg/L
	Benzenidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	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	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	µg/L	ND	µg/L	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	ND	µg/L
	Butyl Benzyl Phthalate	2.33	µg/L	ND	µg/L	ND	µg/L	2.81	µg/L	1.7	µg/L	ND	µg/L	1.59	µg/L	ND	µg/L	ND	µg/L	2.33	µg/L	ND	µg/L	ND	µg/L
	Chlordane	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	ND	µg/L
	Di-n-Butyl Phthalate	1.34	µg/L	ND	µg/L	ND	µg/L	1.58	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	1.33	µg/L	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	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L
	Dieldrin	ND	µg/L											ND	µg/L										
	Diethylphthalate	2.92	µg/L	3.31	µg/L	6.24	µg/L	4.94	µg/L	2.39	µg/L	2.04	µg/L	2.44	µg/L	2.63	µg/L	2.77	µg/L	2.88	µg/L	2.52	µg/L	2.84	µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L											ND	µg/L										
	Endosulfan I	ND	µg/L											ND	µg/L										
	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L											ND	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	ND	µg/L
Hexachlorobutadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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	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	ND	µg/L	
Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21												
INF-001	PCB - 1016	ND	µg/L																						
	PCB - 1221	ND	µg/L																						
	PCB - 1232	ND	µg/L																						
	PCB - 1242	ND	µg/L																						
	PCB - 1248	ND	µg/L																						
	PCB - 1254	ND	µg/L																						
	PCB - 1260	ND	µg/L																						
	Pentachlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L				
	Phenol	14.6	µg/L	14.9	µg/L	10	µg/L	16.3	µg/L	17.7	µg/L	15	µg/L	17.1	µg/L	14.8	µg/L	15.2	µg/L	20.2	µg/L	20.9	µg/L	21	µg/L
	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	µg/L
	Acrolein	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.5	µg/L	0.52	µg/L	0.7	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	ND	µg/L	ND	µg/L	ND	µg/L
	Alpha-BHC	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	ND	µg/L	ND	µg/L	ND	µg/L
	Beta-BHC	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	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	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	8.51	µg/L	6.8	µg/L	7.12	µg/L	7.65	µg/L	8.74	µg/L	7.2	µg/L	7.62	µg/L	6	µg/L	5.87	µg/L	8.3	µg/L	6.56	µg/L	5.14	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	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	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	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	ND	µg/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	µg/L
	Chloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chloroform	2.69	µg/L	2.58	µg/L	3.41	µg/L	2.87	µg/L	3.06	µg/L	2.91	µg/L	1.85	µg/L	1.92	µg/L	2.06	µg/L	3.73	µg/L	4.01	µg/L	3.84	µg/L
	cis-1,3-Dichloropropene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Delta-BHC	ND	µg/L																						
	Dibromochloromethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Ethylbenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Gamma-BHC	ND	µg/L																						
	Methylene Chloride	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	2.08	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodipropylamine	ND	ng/L	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	ng/L
	N-Nitrosodimethylamine	29	ng/L	ND	µg/L	ND	µg/L	41	ng/L	ND	µg/L	ND	µg/L	92	ng/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	35	ng/L
N-Nitrosodiphenylamine	ND	ng/L	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	ng/L	
4,4'-DDD	ND	µg/L																							
4,4'-DDE	ND	µg/L																							
4,4'-DDT	ND	µg/L																							

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21		
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Toluene	1.53	µg/L	1.56	µg/L	1.52	µg/L	1.24	µg/L	1.12	µg/L	1.56	µg/L	0.95	µg/L	2.45	µg/L	3.63	µg/L	4.09	µg/L	1.78	µg/L	1.78	µg/L	
	trans-1,2-Dichloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Lead	3.47	µg/L	2.3	µg/L	2.79	µg/L	2.17	µg/L	2.51	µg/L	2.96	µg/L	2.12	µg/L	2.17	µg/L	2.28	µg/L	2.61	µg/L	2.22	µg/L	2.78	µg/L	
	Antimony	1.56	µg/L	1.05	µg/L	2.19	µg/L	1.12	µg/L	1.19	µg/L	1.27	µg/L	1.03	µg/L	0.87	µg/L	1.11	µg/L	1.05	µg/L	1.22	µg/L	1.06	µg/L	
	Selenium	3.21	µg/L	2.46	µg/L	2.83	µg/L	2.3	µg/L	2.05	µg/L	2.63	µg/L	1.81	µg/L	2.86	µg/L	2.21	µg/L	3.07	µg/L	3.21	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	168	µg/L	164	µg/L	166	µg/L	158	µg/L	145	µg/L	166	µg/L	160	µg/L	153	µg/L	159	µg/L	151	µg/L	162	µg/L	157	µg/L	
	INF-002	Silver	0.43	µg/L	0.61	µg/L	0.48	µg/L	0.48	µg/L	0.61	µg/L	0.33	µg/L	0.3	µg/L	0.34	µg/L	0.64	µg/L	0.67	µg/L	0.43	µg/L	0.66	µg/L
		Arsenic	3.62	µg/L	4.78	µg/L	4.21	µg/L	4.36	µg/L	3.93	µg/L	4.08	µg/L	3.96	µg/L	3.95	µg/L	4.11	µg/L	4.06	µg/L	4.18	µg/L	4.62	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		0.34	µg/L	0.4	µg/L	0.4	µg/L	0.39	µg/L	1.96	µg/L	0.39	µg/L	0.42	µg/L	0.37	µg/L	0.4	µg/L	0.42	µg/L	0.47	µg/L	0.3	µg/L	
Cyanide		1.9	µg/L	1.7	µg/L	2.02	µg/L	4.04	µg/L	ND	µg/L	ND	µg/L	1.48	µg/L	ND	µg/L	2.39	µg/L	1.89	µg/L	2.88	µg/L	3.45	µg/L	
Chromium		5.96	µg/L	8.58	µg/L	7.54	µg/L	6.78	µg/L	9.39	µg/L	5.98	µg/L	5.26	µg/L	5.31	µg/L	6.73	µg/L	6.46	µg/L	6.99	µg/L	5.99	µg/L	
Copper		54.5	µg/L	73.3	µg/L	66.5	µg/L	88.5	µg/L	59.5	µg/L	54.2	µg/L	42.3	µg/L	48.5	µg/L	62.4	µg/L	55.9	µg/L	53.7	µg/L	49.3	µg/L	
Mercury		90	ng/L	61	ng/L	72	ng/L	110	ng/L	50	ng/L	93	ng/L	68	ng/L	120	ng/L	51	ng/L	77	ng/L	65	ng/L	70	ng/L	
Nickel		4.46	µg/L	8.92	µg/L	8.56	µg/L	6.49	µg/L	18.6	µg/L	7.3	µg/L	8.39	µg/L	7.05	µg/L	8.58	µg/L	6.39	µg/L	7.88	µg/L	6.42	µg/L	
1,1,1-Trichloroethane		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
1,1,2,2-Tetrachloroethane		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
1,1,2-Trichloroethane		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
1,1-Dichloroethane		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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-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	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-Dichloropropane		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
1,3-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	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	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	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	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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-Nitrophenol	ND	µg/L	1.93	µg/L	ND	µg/L	1.53	µg/L	ND	µg/L	2.03	µg/L	5.26	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	2.41	µg/L	ND	µg/L	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	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										
	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	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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) 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	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	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	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	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	µg/L	ND	µg/L	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	ND	µg/L
	Butyl Benzyl Phthalate	1.81	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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										
	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	ND	µg/L
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	1.35	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L
	Dieldrin	ND	µg/L											ND	µg/L										
	Diethylphthalate	2.34	µg/L	1.74	µg/L	2.29	µg/L	1.94	µg/L	2.89	µg/L	1.8	µg/L	3.02	µg/L	2.19	µg/L	3.18	µg/L	2.04	µg/L	2	µg/L	1.76	µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L											ND	µg/L										
	Endosulfan I	ND	µg/L											ND	µg/L										
	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L											ND	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	ND	µg/L
	Hexachlorobutadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21												
INF-002	Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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		
	Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	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 - 1016	ND	µg/L											ND	µg/L										
	PCB - 1221	ND	µg/L											ND	µg/L										
	PCB - 1232	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L
	Phenol	2.6	µg/L	0.31	µg/L	3.43	µg/L	ND	µg/L	1.66	µg/L	0.78	µg/L	13.8	µg/L	4.07	µg/L	8.22	µg/L	6.79	µg/L	3.44	µg/L	3.56	µg/L
	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	µg/L
	Acrolein	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L
	Alpha-BHC	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	1.49	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Beta-BHC	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	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	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	5.27	µg/L	3.65	µg/L	4.57	µg/L	4.51	µg/L	5.97	µg/L	4.14	µg/L	4.57	µg/L	3.54	µg/L	3.77	µg/L	5.27	µg/L	3.54	µg/L	2.91	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	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	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	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	ND	µg/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	µg/L
	Chloroethane	2.72	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chloroform	5.63	µg/L	2.14	µg/L	2.24	µg/L	2.01	µg/L	2.72	µg/L	2.81	µg/L	2.05	µg/L	1.91	µg/L	2.92	µg/L	3.49	µg/L	2.47	µg/L	1.68	µg/L
	cis-1,3-Dichloropropene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
Delta-BHC	ND	µg/L											ND	µg/L											
Dibromochloromethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Ethylbenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Gamma-BHC	ND	µg/L											ND	µg/L											
Methylene Chloride	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	4.38	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
N-Nitrosodipropylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 20		Aug 20		Sep 20		Oct 20		Nov 20		Dec 20		Jan 21		Feb 21		Mar 21		Apr 21		May 21		Jun 21	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDD	ND	µg/L											ND	µg/L										
	4,4'-DDE	ND	µg/L											ND	µg/L										
	4,4'-DDT	ND	µg/L											ND	µg/L										
	Tetrachloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Toluene	2.19	µg/L	1.44	µg/L	1.26	µg/L	0.96	µg/L	4.16	µg/L	1.61	µg/L	1.31	µg/L	1.85	µg/L	1.58	µg/L	4.86	µg/L	1.45	µg/L	2.19	µg/L
	trans-1,2-Dichloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Lead	2.63	µg/L	3.31	µg/L	5.44	µg/L	3.17	µg/L	3.13	µg/L	2.27	µg/L	2.48	µg/L	1.6	µg/L	2.47	µg/L	3.61	µg/L	3.8	µg/L	2.16	µg/L
	Antimony	0.96	µg/L	1.04	µg/L	1.1	µg/L	1.16	µg/L	1.53	µg/L	1.14	µg/L	0.82	µg/L	0.9	µg/L	1.22	µg/L	1.1	µg/L	1.05	µg/L	0.83	µg/L
	Selenium	6.68	µg/L	7.38	µg/L	7.6	µg/L	7.52	µg/L	7.01	µg/L	7.2	µg/L	6.83	µg/L	6.29	µg/L	6.4	µg/L	5.54	µg/L	7.63	µg/L	10.1	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	97	µg/L	124	µg/L	118	µg/L	118	µg/L	150	µg/L	106	µg/L	101	µg/L	103	µg/L	125	µg/L	136	µg/L	123	µg/L	124	µg/L	

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
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Advance-Tech Plating, Inc.	1/26/2021	\$775	Notice of Violation	2021-00041170
Alloy Die Casting Co.	11/5/2020	\$525	Notice of Violation	2020-00039057
AlSCO, Inc.	5/20/2021	\$400	Notice of Violation	2021-00043012
Aluminum Precision Products, Inc. (Warner)	11/12/2020	\$756	Notice of Violation	2020-00039311
Anaheim Extrusion Co., Inc.	2/11/2021	\$507	Notice of Violation	2021-00041504
Anchen Pharmaceuticals, Inc. (Goodyear)	9/17/2020	\$507	Notice of Violation	2020-00037880
Andres Technical Plating	6/3/2021	\$400	Notice of Violation	2021-00043419
APCT Anaheim	7/2/2020	\$725	Notice of Violation	2020-00036437
APCT Orange County	11/24/2020	\$725	Notice of Violation	2020-00039458
Aseptic Technology, LLC (Corbit)	4/1/2021	\$507	Notice of Violation	2021-00042253
Avid Bioservices, Inc.	1/28/2021	\$400	Notice of Violation	2021-00040780
Avid Bioservices, Inc.	4/15/2021	\$400	Notice of Violation	2021-00042404
Bazz Houston Co.	2/4/2021	\$400	Notice of Violation	2021-00041340
Bimbo Bakeries U.S.A, Inc.	1/28/2021	\$507	Notice of Violation	2021-00040950
Brindle/Thomas - Catalina & Copeland	3/4/2021	\$400	Notice of Violation	2021-00040655
Catalina Cylinders, A Div. of APP	8/27/2020	\$400	Notice of Violation	2020-00037660
City of Newport Beach (West Coast Hwy - Oil Extraction)	8/17/2020	\$400	Notice of Violation	2020-00036727
CJ Foods Manufacturing Corp.	6/17/2021	\$507	Notice of Violation	2021-00043670
Coast to Coast Circuits, Inc.	9/10/2020	\$400	Notice of Violation	2020-00037894
Coast to Coast Circuits, Inc.	4/15/2021	\$725	Notice of Violation	2021-00042377
Columbine Associates	8/27/2020	\$400	Notice of Violation	2020-00037682
Cooper and Brain, Inc.	12/10/2020	\$756	Notice of Violation	2020-00039919
Corru-Kraft Buena Park	7/30/2020	\$507	Notice of Violation	2020-00037094
Corru-Kraft Fullerton	3/4/2021	\$507	Notice of Violation	2021-00041831
Data Electronic Services, Inc.	12/17/2020	\$200	Notice of Violation	2020-00040011
Diamond Environmental Services, LP	8/13/2020	\$507	Notice of Violation	2020-00037425
Dr. Smoothie Enterprises - DBA Bevolution Group	10/29/2020	\$507	Notice of Violation	2020-00038971
Dr. Smoothie Enterprises - DBA Bevolution Group	11/24/2020	\$200	Notice of Violation	2020-00039460
Dr. Smoothie Enterprises - DBA Bevolution Group	4/1/2021	\$507	Notice of Violation	2021-00042254
Dr. Smoothie Enterprises - DBA Bevolution Group	5/6/2021	\$200	Notice of Violation	2021-00042862
Electrode Technologies, Inc. dba Reid Metal Finishing	2/4/2021	\$725	Notice of Violation	2021-00041001

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Electrode Technologies, Inc. dba Reid Metal Finishing	4/1/2021	\$400	Notice of Violation	2021-00042241
Golden State Pumping LLC	8/20/2020	\$707	Notice of Violation	2020-00037465
Golden State Pumping LLC	10/1/2020	\$200	Notice of Violation	2020-00038169
Golden State Pumping LLC	11/12/2020	\$507	Notice of Violation	2020-00039313
Graphic Packaging International, Inc.	3/18/2021	\$507	Notice of Violation	2021-00041988
Harbor Truck Bodies, Inc.	2/4/2021	\$725	Notice of Violation	2021-00041264
Hixson Metal Finishing	8/13/2020	\$200	Notice of Violation	2020-00037337
Hixson Metal Finishing	5/6/2021	\$200	Notice of Violation	2021-00042858
Imperial Plating	2/25/2021	\$775	Notice of Violation	2021-00041579
La Habra Bakery	7/2/2020	\$507	Notice of Violation	2020-00036439
Linco Industries, Inc.	4/15/2021	\$725	Notice of Violation	2021-00042381
Linco Industries, Inc.	5/20/2021	\$200	Notice of Violation	2021-00042987
McKenna Labs, Inc.	1/26/2021	\$725	Notice of Violation	2021-00041183
Meggitt (Orange County), Inc.	12/17/2020	\$525	Notice of Violation	2020-00039758
Meggitt (Orange County), Inc.	1/28/2021	\$400	Notice of Violation	2021-00040781
Micrometals, Inc.	8/6/2020	\$507	Notice of Violation	2020-00037334
National Construction Rentals	3/11/2021	\$507	Notice of Violation	2021-00041926
Newlight Technologies, Inc.	1/28/2021	\$525	Notice of Violation	2021-00040954
Nor-Cal Beverage Co., Inc. (NCB)	7/2/2020	\$200	Notice of Violation	2020-00036445
Nor-Cal Beverage Co., Inc. (NCB)	11/24/2020	\$507	Notice of Violation	2020-00039463
Omni Metal Finishing, Inc. (Building 4)	10/15/2020	\$725	Notice of Violation	2020-00038685
Pacific Western Container	6/3/2021	\$525	Notice of Violation	2021-00043446
Performance Powder, Inc.	6/17/2021	\$725	Notice of Violation	2021-00043673
Q-Flex Inc.	10/8/2020	\$525	Notice of Violation	2020-00038579
Quality Aluminum Forge, LLC (Cypress South)	8/27/2020	\$507	Notice of Violation	2020-00037691
Rainbow Disposal Co., Inc. (Building A)	7/14/2020	\$200	Notice of Violation	2020-00034859
Republic Waste Services of So. Cal., LLC	10/8/2020	\$507	Notice of Violation	2020-00038597
Soldermask, Inc.	4/29/2021	\$400	Notice of Violation	2021-00042681
South Coast Baking, LLC	7/14/2020	\$507	Notice of Violation	2020-00036062
SPS Technologies LLC, DBA Cherry Aerospace	11/24/2020	\$525	Notice of Violation	2020-00039464
SPS Technologies LLC, DBA Cherry Aerospace	1/28/2021	\$400	Notice of Violation	2021-00040955
Star Manufacturing LLC, dba Commercial Metal Forming	9/3/2020	\$556	Notice of Violation	2020-00037475

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2020/21
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Star Manufacturing LLC, dba Commercial Metal Forming	12/3/2020	\$756	Notice of Violation	2020-00039310
Star Manufacturing LLC, dba Commercial Metal Forming	5/20/2021	\$756	Notice of Violation	2021-00042988
TTM Technologies North America, LLC. (Coronado)	12/17/2020	\$725	Notice of Violation	2020-00040045
Van Law Food Products, Inc.	4/5/2021	\$500	Compliance Requirement Letter	2021-00042308
Vi-Cal Metals, Inc.	4/5/2021	\$500	Compliance Requirement Letter	2021-00042309

Appendix E. Public Notice of Significantly Noncompliant
Industries

AFFIDAVIT OF PUBLICATION
STATE OF CALIFORNIA,)

) ss.

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 a party to or interested in the above entitled matter. I am the principal clerk of **The Orange County Register**, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which news-paper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of November 19, 1905, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

October 21, 2021

"I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct":

Executed at Santa Ana, Orange County, California, on

Date: October 21, 2021



Signature

The Orange County Register
2190 S. Towne Centre Pl.
Anaheim, CA 92806

PROOF OF PUBLICATION

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)(viii), the Orange County Sanitation District (OC San) is hereby publishing the following list of permittees who, during July 1, 2020 through June 30, 2021, 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 occurring when 66% or more of all measurements exceed the discharge limits for the same pollutant.
- Acute violations of discharge limits occurring when 33% or more of all measurements are a major violation of the discharge limits.
- Any other violation that OC San determines has caused, alone or in combination with other discharges, interference or pass through.
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in OC San'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.
- 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 OC San's Wastewater Discharge Regulations (Ordinance).
- Any other violation or group of violations, which OC San determines will adversely affect the implementation of the pretreatment program.

OC San has taken enforcement action against these permittees. The majority of the permittees listed below have implemented adequate corrective actions and may be in compliance with the wastewater discharge standards as of the date of this publication.

Company Name	Permit No.	Category	City
Industries SNC Due to Discharge Violations			
Avid Bioservices, Inc.	1-571332	Pharmaceutical	Tustin
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim
Industries SNC Due to Reporting Violations			
9W Halo Western opCo, L.P.	1-400373	OC San Local Limits	Orange
Alex C. Ferguson, LLC, A Zap Company	1-401167	Soap and Detergent Manufacturing	Stanton
Moy Die Casting Co.	1-531437	Metal Molding and Coasting	Buena Park
Alloy Tech Electropolishing, Inc.	1-411036	Metal Finishing	Santa Ana
Coast to Coast Circuits, Inc.	1-111129	Metal Finishing	Huntington Beach
Coastline High Performance Coatings, LTD	1-400812	Metal Finishing	Garden Grove
Cooper and Brian, Inc.	1-431070	OC San Local Limits	Erie
Diamond Environmental Services, LP	1-400244	OC San Local Limits	Fullerton
Dunham Metal Plating Inc.	1-401023	Metal Finishing	Orange
Golden State Pumping LLC	1-400975	OC San Local Limits	Orange
Hi Tech Solder	1-521790	Metal Finishing	Pleasant
International Paper Company (Buena Park Bag)	1-531419	OC San Local Limits	Buena Park
Naterra Construction Rentals	1-400852	OC San Local Limits	Santa Ana
Patio and Door Outlet, Inc.	1-521783	Metal Finishing	Orange
Platinum Surface Coating, Inc.	1-521852	Metal Finishing	Anaheim
Quality Aluminum Forge, LLC (Cypress South)	1-400272	Aluminum Forming	Orange
Republic Waste Services	1-521827	OC San Local Limits	Anaheim
Republic Waste Services of So. Cal., LLC	1-402169	OC San Local Limits	Anaheim
Robinson Pharma, Inc. (Harbor North)	1-400128	Pharmaceutical	Santa Ana
V-Cal Metals, Inc.	1-521848	OC San Local Limits	Anaheim

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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:

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Appendix G. Irvine Ranch Water District (IRWD) Sampling

APPENDIX G

2020/21 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 detection limits shown in the results are the limits for that particular sample. The 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 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021 4/26/2021	2020-2021	2019-2020	
INFLUENT							
Antimony	ND	ND	ND	ND	ND	ND	0.5
Arsenic	2.28	2.86	2.25	2.45	2.46	1.96	1
Beryllium	ND	ND	ND	ND	ND	ND	0.5
Cadmium	ND	ND	ND	ND	ND	ND	0.25
Chromium	1.75	1.19	1.46	1.16	1.39	1.28	0.5
Copper	62	53	46.5	30.3	47.95	50.73	0.5
Lead	0.86	0.62	0.67	0.59	0.69	0.58	0.5
Mercury	0.01	ND	0.03	0.01	0.01	0	0.01
Nickel	3.27	2.84	2.88	3.06	3.01	2.94	0.5
Selenium	2	1.97	1.96	1.83	1.94	2.06	0.5
Silver	0.34	0.26	ND	0.26	0.22	0.22	0.25
Thallium	ND	ND	ND	ND	ND	ND	1
Total Cyanide	34	100	20	48	50.5	17.33	5
Zinc	149	109	126	107	122.75	115.83	0.5
EFFLUENT							
Antimony	ND	ND	ND	ND	ND	0.13	0.5
Arsenic	1.69	2.02	1.46	2.06	1.81	1.52	1
Beryllium	ND	ND	ND	ND	ND	ND	0.5
Cadmium	ND	ND	ND	ND	ND	ND	0.25
Chromium	ND	ND	ND	ND	ND	0.27	0.5
Copper	5.54	4.55	7.3	4.71	5.53	6.96	0.5
Lead	ND	ND	ND	ND	ND	ND	0.5
Mercury	ND	ND	ND	ND	ND	ND	0.01
Nickel	2.73	1.95	1.41	2.03	2.03	2.88	0.5
Selenium	1.36	1.04	1.31	1.23	1.24	1.38	0.5
Silver	ND	ND	ND	ND	ND	ND	0.25
Thallium	ND	ND	ND	ND	ND	ND	1
Total Cyanide	ND	ND	ND	ND	ND	0.93	5
Zinc	54.8	73.8	75.2	95.8	74.9	46.05	0.5
SLUDGE							
Antimony	ND	ND	ND	ND	ND	0.68	2.5
Arsenic	ND	24.7	ND	15	9.93	7.26	5
Beryllium	ND	ND	ND	ND	ND	ND	2.5
Cadmium	ND	ND	ND	ND	ND	1.01	1.25
Chromium	24.1	35	2.91	18.9	20.23	19.68	2.5
Copper	1140	6620	4750	710	3305	1019.75	2.5
Lead	13.7	138	91.3	9.59	63.15	16.59	2.5

APPENDIX G
SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, EFFLUENT AND SLUDGE, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021 4/26/2021	2020-2021	2019-2020	
Mercury	0.61	1.28	0.01	0.72	0.66	0.42	0.01
Nickel	53.6	77.2	14.2	37.7	45.68	47.33	2.5
Selenium	24.2	31.4	ND	22.1	19.43	16.93	2.5
Silver	5.02	8.75	ND	5.29	4.77	3.49	1.25
Thallium	ND	ND	ND	ND	ND	ND	5
Total Cyanide	ND	ND	ND	ND	ND	7.75	5
Zinc	1590	2390	2440	1070	1872.5	1250.75	2.5

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.5
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Acrolein	ND	ND	ND	ND	ND	ND	5
Acrylonitrile	ND	ND	ND	ND	ND	ND	2
Benzene	ND	ND	ND	ND	ND	ND	0.5
Bromodichloromethane	ND	ND	ND	ND	ND	ND	0.5
Bromoform	ND	ND	ND	ND	ND	ND	0.5
Bromomethane	ND	ND	ND	ND	ND	ND	0.5
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.5
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Chloroethane	ND	ND	ND	ND	ND	ND	0.5
Chloroform	0.86	0.86	1	1.31	1.01	1.29	0.5
Chloromethane	ND	ND	ND	ND	ND	ND	0.5
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Dibromochloromethane	ND	ND	ND	ND	ND	0.16	0.5
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.5
Methylene chloride	ND	ND	ND	ND	ND	ND	2
Tetrachloroethene	ND	ND	ND	ND	ND	0.55	0.5
Toluene	0.93	0.67	1.04	ND	0.66	1.54	0.5
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.5
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.5
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.5
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10
Acetone	121	109	84.3	143	114.33	179.45	2
Carbon disulfide	ND	ND	6.1	ND	ND	2.13	1

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.5
Methyl ethyl ketone	ND	2.72	ND	2.15	1.22	2.59	2
o-Xylene	ND	ND	ND	ND	ND	ND	0.5
Styrene	ND	ND	ND	ND	ND	ND	0.5
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	9.08
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	4.54
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	9.08
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	9.08
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	9.08
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	22.7
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	9.08
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	9.08
Acenaphthene	ND	ND	ND	ND	ND	ND	4.54
Acenaphthylene	ND	ND	ND	ND	ND	ND	9.08
Anthracene	ND	ND	ND	ND	ND	ND	9.08
Benzidine	ND	ND	ND	ND	ND	ND	22.7
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	9.08
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	9.08
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	9.08
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	18.16
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	9.08
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	9.08
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	4.54
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	9.08
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	22.7
Butyl benzyl phthalate	ND	ND	ND	ND	ND	ND	9.08
Chrysene	ND	ND	ND	ND	ND	ND	9.08
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	18.16
Diethyl phthalate	ND	ND	ND	ND	ND	ND	9.08
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	9.08
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	9.08
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	9.08
Fluoranthene	ND	ND	ND	ND	ND	ND	4.54
Fluorene	ND	ND	ND	ND	ND	ND	9.08
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	4.54
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	4.54

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	22.7
Hexachloroethane	ND	ND	ND	ND	ND	ND	4.54
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	18.16
Isophorone	ND	ND	ND	ND	ND	ND	4.54
Naphthalene	ND	ND	ND	ND	ND	ND	4.54
Nitrobenzene	ND	ND	ND	ND	ND	ND	4.54
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	9.08
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	9.08
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	4.54
Phenanthrene	ND	ND	ND	ND	ND	ND	9.08
Pyrene	ND	ND	ND	ND	ND	ND	9.08
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	9.08
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	9.08
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	9.08
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	22.7
2-Chlorophenol	ND	ND	ND	ND	ND	ND	9.08
2-Nitrophenol	ND	ND	ND	ND	ND	ND	9.08
4,6-Dinitro-o-cresol	ND	ND	ND	ND	ND	ND	22.7
4-Nitrophenol	ND	ND	ND	ND	ND	ND	45.4
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	4.54
Pentachlorophenol	ND	ND	ND	ND	ND	ND	9.08
Phenol	8.28	8.04	7.3	6.66	7.57	6.94	4.54
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	ND	ND	ND	ND	ND	22.7
2-Methylnaphthalene	NA	NA	NA	NA	NA	ND	0
2-Methylphenol	ND	ND	ND	ND	ND	ND	22.7
2-Nitroaniline	NA	NA	NA	NA	NA	ND	0
3-Nitroaniline	NA	NA	NA	NA	NA	ND	0
4-Chloroaniline	NA	NA	NA	NA	NA	ND	0
3&4-Methylphenol	18.4	10.8	10.2	30.7	17.53	45.88	4.54
4-Nitroaniline	NA	NA	NA	NA	NA	ND	0
Aniline	NA	NA	NA	NA	NA	ND	0
Benzoic acid	NA	NA	NA	NA	NA	ND	0
Benzyl alcohol	NA	NA	NA	NA	NA	ND	0
Dibenzofuran	NA	NA	NA	NA	NA	ND	0
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	ND	ND	ND	ND	ND	2.5
4,4'-DDE	ND	ND	ND	ND	ND	ND	2.5

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.5
Aldrin	ND	ND	ND	ND	ND	ND	0.25
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.5
Beta-BHC	ND	ND	ND	ND	ND	ND	0.25
Chlordane	ND	ND	ND	ND	ND	ND	5
Delta-BHC	ND	ND	ND	ND	ND	ND	0.25
Dieldrin	ND	ND	ND	ND	ND	ND	0.5
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	2.5
Endosulfan-I	ND	ND	ND	ND	ND	ND	1
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.5
Endrin	ND	ND	ND	ND	ND	ND	0.5
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.5
Heptachlor	ND	ND	ND	ND	ND	ND	0.5
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.5
Lindane	ND	ND	ND	ND	ND	ND	1
Methoxychlor	NA	NA	NA	NA	NA	ND	0
PCB-1016	ND	ND	ND	ND	ND	ND	25
PCB-1221	ND	ND	ND	ND	ND	ND	25
PCB-1232	ND	ND	ND	ND	ND	ND	25
PCB-1242	ND	ND	ND	ND	ND	ND	25
PCB-1248	ND	ND	ND	ND	ND	ND	25
PCB-1254	ND	ND	ND	ND	ND	ND	25
PCB-1260	ND	ND	ND	ND	ND	ND	25
Toxaphene	ND	ND	ND	ND	ND	ND	5

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.5
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Acrolein	ND	ND	ND	ND	ND	ND	5
Acrylonitrile	ND	ND	ND	ND	ND	ND	2
Benzene	ND	ND	ND	ND	ND	ND	0.5
Bromodichloromethane	24.4	22.6	18.9	21.1	21.75	30.08	0.5
Bromoform	ND	0.37	ND	ND	0.09	0.3	0.5
Bromomethane	ND	ND	ND	ND	ND	ND	0.5
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.5
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Chloroethane	ND	ND	ND	ND	ND	ND	0.5
Chloroform	57.7	65	49.5	93	66.3	101.75	0.5
Chloromethane	ND	ND	ND	ND	ND	ND	0.5
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Dibromochloromethane	7.15	6.27	5.32	6.02	6.19	8.6	0.5
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.5
Methylene chloride	ND	4.81	ND	ND	1.2	ND	2
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.5
Toluene	ND	ND	ND	ND	ND	ND	0.5
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.5
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.5
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.5
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10
Acetone	ND	ND	2.15	ND	0.54	2.43	2
Carbon disulfide	ND	ND	ND	ND	ND	ND	1

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.5
Methyl ethyl ketone	ND	ND	ND	ND	ND	ND	2
o-Xylene	ND	ND	ND	ND	ND	ND	0.5
Styrene	ND	ND	ND	ND	ND	ND	0.5
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	2
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	1
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	2
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	5
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	2
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	2
Acenaphthene	ND	ND	ND	ND	ND	ND	1
Acenaphthylene	ND	ND	ND	ND	ND	ND	2
Anthracene	ND	ND	ND	ND	ND	ND	2
Benzidine	ND	ND	ND	ND	ND	ND	5
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	2
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	2
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	2
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	4
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	2
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	2
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	1
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	2
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	5
Butyl benzyl phthalate	ND	ND	ND	ND	ND	ND	2
Chrysene	ND	ND	ND	ND	ND	ND	2
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	4
Diethyl phthalate	ND	ND	ND	ND	ND	ND	2
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	2
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	2
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	2
Fluoranthene	ND	ND	ND	ND	ND	ND	1
Fluorene	ND	ND	ND	ND	ND	ND	2
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	1
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	1

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	5
Hexachloroethane	ND	ND	ND	ND	ND	ND	1
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	4
Isophorone	ND	ND	ND	ND	ND	ND	1
Naphthalene	ND	ND	ND	ND	ND	ND	1
Nitrobenzene	ND	ND	ND	ND	ND	ND	1
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	2
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	2
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	1
Phenanthrene	ND	ND	ND	ND	ND	ND	2
Pyrene	ND	ND	ND	ND	ND	ND	2
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	2
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	2
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	2
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	5
2-Chlorophenol	ND	ND	ND	ND	ND	ND	2
2-Nitrophenol	ND	ND	ND	ND	ND	ND	2
4,6-Dinitro-o-cresol	ND	ND	ND	ND	ND	ND	5
4-Nitrophenol	ND	ND	ND	ND	ND	ND	10
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	1
Pentachlorophenol	ND	ND	ND	ND	ND	ND	2
Phenol	ND	ND	ND	ND	ND	ND	1
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	ND	ND	ND	ND	ND	5
2-Methylnaphthalene	NA	NA	NA	NA	NA	ND	0
2-Methylphenol	ND	ND	ND	ND	ND	ND	5
2-Nitroaniline	NA	NA	NA	NA	NA	ND	0
3-Nitroaniline	NA	NA	NA	NA	NA	ND	0
4-Chloroaniline	NA	NA	NA	NA	NA	ND	0
3&4-Methylphenol	ND	ND	ND	ND	ND	ND	1
4-Nitroaniline	NA	NA	NA	NA	NA	ND	0
Aniline	NA	NA	NA	NA	NA	ND	0
Benzoic acid	NA	NA	NA	NA	NA	ND	0
Benzyl alcohol	NA	NA	NA	NA	NA	ND	0
Dibenzofuran	NA	NA	NA	NA	NA	ND	0
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDE	ND	ND	ND	ND	ND	ND	0.03

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
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	0.5
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	ND	NA	NA	ND	ND	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.5
PCB-1221	ND	ND	ND	ND	ND	ND	1.5
PCB-1232	ND	ND	ND	ND	ND	ND	1.5
PCB-1242	ND	ND	ND	ND	ND	ND	1.5
PCB-1248	ND	ND	ND	ND	ND	ND	1.5
PCB-1254	ND	ND	ND	ND	ND	ND	1.5
PCB-1260	ND	ND	ND	ND	ND	ND	1.5
Toxaphene	ND	ND	ND	ND	ND	ND	2.5

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.5
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.5
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Acrolein	ND	ND	ND	ND	ND	ND	5
Acrylonitrile	ND	ND	ND	ND	ND	ND	2
Benzene	ND	ND	ND	ND	ND	ND	0.5
Bromodichloromethane	ND	ND	ND	ND	ND	0.87	0.5
Bromoform	ND	ND	ND	ND	ND	ND	0.5
Bromomethane	ND	ND	ND	ND	ND	ND	0.5
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.5
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.5
Chloroethane	ND	ND	ND	ND	ND	0.81	0.5
Chloroform	1.85	1.81	1.11	2.92	1.92	6.18	0.5
Chloromethane	ND	ND	ND	ND	ND	ND	0.5
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Dibromochloromethane	ND	ND	ND	ND	ND	0.19	0.5
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.5
Methylene chloride	ND	ND	ND	ND	ND	ND	2
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.5
Toluene	11.8	20.3	7.66	4.21	10.99	11.19	0.5
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.5
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.5
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.5
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.5
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.5
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10
Acetone	99.2	56.5	132	72.4	90.03	71.75	2
Carbon disulfide	ND	ND	114	74.5	47.13	31.68	1

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.5
Methyl ethyl ketone	ND	ND	ND	ND	ND	2.15	2
o-Xylene	ND	ND	ND	ND	ND	ND	0.5
Styrene	ND	ND	ND	ND	ND	ND	0.5
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	10
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	10
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	10
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	25
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	10
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	10
Acenaphthene	ND	ND	ND	ND	ND	ND	10
Acenaphthylene	ND	ND	ND	ND	ND	ND	10
Anthracene	ND	ND	ND	ND	ND	ND	10
Benzidine	ND	ND	ND	ND	ND	ND	25
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	10
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	10
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	10
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	20
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	10
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	10
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	10
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	10
Bis(2-Ethylhexyl) phthalate	ND	73.3	ND	ND	18.33	37.25	25
Butyl benzyl phthalate	ND	ND	ND	ND	ND	ND	10
Chrysene	ND	ND	ND	ND	ND	ND	10
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	20
Diethyl phthalate	ND	ND	ND	ND	ND	ND	10
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	20
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	10
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	10
Fluoranthene	ND	ND	ND	ND	ND	ND	5
Fluorene	ND	ND	ND	ND	ND	ND	10
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	10
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	10

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	25
Hexachloroethane	ND	ND	ND	ND	ND	ND	10
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	20
Isophorone	ND	ND	ND	ND	ND	ND	10
Naphthalene	ND	ND	ND	ND	ND	ND	10
Nitrobenzene	ND	ND	ND	ND	ND	ND	10
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	10
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	10
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	10
Phenanthrene	ND	ND	ND	ND	ND	ND	10
Pyrene	ND	ND	ND	ND	ND	ND	10
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	10
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	10
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	10
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	25
2-Chlorophenol	ND	ND	ND	ND	ND	ND	10
2-Nitrophenol	ND	ND	ND	ND	ND	ND	10
4,6-Dinitro-o-cresol	ND	ND	ND	ND	ND	ND	25
4-Nitrophenol	ND	ND	ND	ND	ND	ND	50
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	10
Pentachlorophenol	ND	ND	ND	ND	ND	ND	10
Phenol	15.4	13.2	70	ND	24.65	18.65	5
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	ND	ND	ND	ND	ND	25
2-Methylnaphthalene	NA	NA	NA	NA	NA	ND	0
2-Methylphenol	ND	ND	ND	ND	ND	ND	25
2-Nitroaniline	NA	NA	NA	NA	NA	ND	0
3-Nitroaniline	NA	NA	NA	NA	NA	ND	0
4-Chloroaniline	NA	NA	NA	NA	NA	ND	0
3&4-Methylphenol	15.8	24.4	44	ND	21.05	156.95	5
4-Nitroaniline	NA	NA	NA	NA	NA	ND	0
Aniline	NA	NA	NA	NA	NA	ND	0
Benzoic acid	NA	NA	NA	NA	NA	ND	0
Benzyl alcohol	NA	NA	NA	NA	NA	ND	0
Dibenzofuran	NA	NA	NA	NA	NA	ND	0
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	ND	ND	ND	ND	ND	2.5
4,4'-DDE	ND	ND	ND	ND	ND	ND	2.5

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2020-2021
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/9/2020	10/6/2020	1/5/2021	4/13/2021	2020-2021	2019-2020	
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.5
Aldrin	ND	ND	ND	ND	ND	ND	0.25
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.5
Beta-BHC	ND	ND	ND	ND	ND	ND	0.25
Chlordane	ND	ND	ND	ND	ND	ND	5
Delta-BHC	ND	ND	ND	ND	ND	ND	0.5
Dieldrin	ND	ND	ND	ND	ND	ND	0.5
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	2.5
Endosulfan-I	ND	ND	ND	ND	ND	ND	1
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.5
Endrin	ND	ND	ND	ND	ND	ND	0.5
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.5
Heptachlor	ND	ND	ND	ND	ND	ND	0.05
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.5
Lindane	ND	ND	ND	ND	ND	ND	1
Methoxychlor	NA	NA	NA	NA	NA	ND	0
PCB-1016	ND	ND	ND	ND	ND	ND	25
PCB-1221	ND	ND	ND	ND	ND	ND	25
PCB-1232	ND	ND	ND	ND	ND	ND	25
PCB-1242	ND	ND	ND	ND	ND	ND	25
PCB-1248	ND	ND	ND	ND	ND	ND	25
PCB-1254	ND	ND	ND	ND	ND	ND	25
PCB-1260	ND	ND	ND	ND	ND	ND	25
Toxaphene	ND	ND	ND	ND	ND	ND	50

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

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 19, 2021

Ms. Rose Cardoza
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 2020 - 2021)

Dear Ms. Cardoza:

This annual report has been prepared in the format provided by OC San. 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.

SAWPA had no permittees who were in Significant Noncompliance during the period of July 1, 2020, through June 30, 2021.

2. Reporting Clarification.

The July 17, 2020, July 31, 2020, January 22, 2021, and April 30, 2021, Monitoring Data for the Mountainview Generating Station, and the July 7, 2020, January 5, 2021, and June 15, 2021 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:
 - Corona Regional Medical Center – 1/28/21 Self-Monitoring Report
 - Eastside Water Treatment Facility – 3/3/21 Self-Monitoring Reports
 - La Sierra University – 1/13/21 Self-Monitoring Report
 - Magnolia Foods – 1/14/21 Self-Monitoring Report
 - SARI Metering Station – 1/22/21 additional OC San sampling data

Jasmin A. Hall
Chair
Inland Empire
Utilities Agency

Bruce Whitaker
Vice Chair
Orange County
Water District

Mike Gardner
Secretary-Treasurer
Western Municipal
Water District

June D. Hayes
Commissioner
San Bernardino Valley
Municipal Water District

David J. Slawson
Commissioner
Eastern Municipal
Water District

Jeffrey J. Mosher
General Manager

- SARI Metering Station – 3/4/21 control authority monitoring (TOC)
- Temescal Desalter – 1/13/21 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:

- Mountainview Generating Station – 4/30/21 control authority monitoring (TTO)
- Pyrite Canyon Treatment Facility – 5/14/21 additional OC San sampling data
- Pyrite Canyon Treatment Facility – June 2021 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, 2020, through June 30, 2021) was 4,009 million gallons.

I certify, under penalty of law, that the information submitted in the attached documents (Attachments 1, 2, 3, 4, 5, and 6), 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

E-Copy: Jason Daniel, OC San

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2020 – JUNE 30, 2021
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anita B. Smith Treatment Facility	Western	Direct	D1074-4	2100 Fleetwood Drive, Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	4	6	4			
Aramark Uniform & Career Apparel, LLC	Western	Direct	D1004-1.1	1135 Hall Avenue, Riverside, CA 92509	812332	SIU	403.5(d)	-	6	14	34	Lead (Local)		
California Institution for Men	IEUA	Direct	D1006-4	5997 Edison Avenue, Chino, CA 91710	922140	SIU	403.5(d)	-	4	10	26			
Chino I Desalter	SAWPA	Direct	D1081-4	6905 Kimball Avenue, Chino, CA 91709	221310	SIU	403.5(d)	-	4	8	4			
Chino II Desalter	SAWPA	Direct	D1010-4	11251 Harrel Street, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	16	10			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-1	715 East 4th Street, Beaumont, CA 92223	221320	SIU	403.5(d)	-	4	4	18			
City of Colton - Agua Mansa Power Plant	Valley District	Direct	D1002-4	2040 W. Agua Mansa Road, Colton, CA 92324	221122	SIU	403.5(d)	-	4	20	20			
City of Corona Ion Exchange Treatment Plant	Western	Direct	D1125-3	410 Rimpau Avenue, Corona, CA 92882	221310	SIU	403.5(d)	-	3	4	2			Permit Closed 2/25/2021
City of Corona's Water Reclamation Facility No.1	Western	Direct - Emergency	E1013-2.1	2205 Railroad Street, Corona, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 8/30/2020
Dart Container Corporation	Western	Direct	D1019-4	150 S. Maple Street, Corona, CA 92880	326140	SIU	403.5(d)	-	4	21	4			
Del Real, LLC	JCSD	Direct	D1021-3	11041 Inland Avenue, Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	6	42	37			
EMWD Energy Dissipater	SAWPA	Direct - Emergency	E1068-2.1	636 Minthorn Street, Lake Elsinore, CA 92530	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/10/2020
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-4	29541 Murrieta Road, Menifee, CA 92586	221310	SIU	403.5(d)	-	4	8	4			
EMWD Railroad Canyon Pipeline	SAWPA	Direct - Emergency	E1067-3.1	Railroad Canyon Road, Canyon Lake, CA 92587	221320	SIU	403.5(d)	-	1	0	0			Permit Closed 12/9/2020
Giuliano & Sons Briners, Inc.	Western	Indirect	I1031-3	10380 Alder Avenue, Bloomington, CA 92316	311421	SIU	403.5(d)	-	2	2	0			Permit Closed 11/4/2020

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2020 – JUNE 30, 2021
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
IEUA Los Serranos	SAWPA	Direct - Emergency	E1037-2.1	6075 Kimball Avenue, Chino, CA 91708	221320	SIU	403.5(d)	-	1	0	0			Permit Closed 11/27/2020
Infineon Technologies Americas Corporation	EMWD	Indirect	I1039-4	41915 Business Park Drive, Temecula, CA 92590	334413	CIU	469.18	Y	4	11	8			
JCSD Archibald Metering Station	SAWPA	Direct - Emergency	E1041-2.1	6990 Archibald Avenue, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Close 12/5/2020
JCSD Celebration Metering Station	SAWPA	Direct - Emergency	E1042-2.1	5972 Hamner Avenue, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/27/2020
JCSD Chandler Lift Station	SAWPA	Direct - Emergency	E1043-2.1	14087 Chandler Street, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/4/2020
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-4	Etiwanda Ave. and north of Bellegrave Ave., Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	39	26			
JCSD Hamner Lift Station	SAWPA	Direct - Emergency	E1046-2.3	7302 Hamner Avenue, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/19/2020
JCSD Hamner Metering Station	SAWPA	Direct	D1045-4	5410 Hamner Avenue, Eastvale, CA 91752	221320	SIU	403.5(d)	-	4	16	16			
JCSD Harrison Metering Station	SAWPA	Direct - Emergency	E1047-2.3	6998 Harrison Avenue, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Close 11/20/2020
JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SAWPA	Direct	D1070-5	4150 Etiwanda Avenue, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	6	4			
JCSD Scholar Way Metering Station	SAWPA	Direct - Emergency	E1113-1.1	6980 Scholar Way, Eastvale, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 11/14/2020
JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-4	3474 De Forest Circle, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	0	0			
JCSD Wineville Metering Station	SAWPA	Direct	D1048-4	5101 Wineville Avenue, Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	16	24			
Metal Container Corporation	JCSD	Direct	D1056-3	10980 Inland Avenue, Jurupa Valley, CA 91752	322431	CIU	465.45(d)	-	4	28	16			

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2020 – JUNE 30, 2021
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
Mission Linen Supply	IEUA	Direct	D1057-4	5400 Alton Street, Chino, CA 91710	812332	SIU	403.5(d)	-	4	40	41	O&G Mineral (Local)		
Mountainview Generating Station	Valley District	Direct	D1058-3	2492 W. San Bernardino Ave., Redlands, CA 92374	221112	CIU	423.17	-	4	22	22			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-2	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	2	6	28			SIU Permit Issued
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-2	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	4	24	28			SIU Permit Issued
OLS Energy	IEUA	Direct	D1059-3	5601 Eucalyptus Avenue, Chino, CA 91710	221112	CIU	423.17	-	4	33	46			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-4	3400 Pyrite Street, Jurupa Valley, CA 92509	562910 , 562211	SIU	403.5(d)	-	4	43	273			
Rayne Water Conditioning	SBMWD	Indirect	I1066-3	939 W. Reece Street, San Bernardino, CA 92411	561990	SIU	403.5(d)	-	5	40	27	Copper (Local)		
Repet, Inc.	IEUA	Direct	D1069-4.1	14207 Monte Vista Avenue, Chino, CA 91710	423930	SIU	403.5(d)	-	4	39	53	Sulfide (dissolved) (Local)		
Rialto Bioenergy Facility, LLC	Valley District	Direct	D1130-1	503 E. Santa Ana Avenue, Bloomington, CA 92316	562219 , 221118 , 221320	SIU	403.5(d)	-	5	12	391	BOD, TSS, pH (Local)		
SBMWD Water Reclamation Plant	SAWPA	Direct - Emergency	E1075-2.2	399 Chandler Place, San Bernardino, CA 92408	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 10/26/2020
Temescal Desalter	Western	Direct	D1012-4	745 Public Safety Way, Corona, CA 92880	221310	SIU	403.5(d)	-	4	8	5	pH (Local)		
Wellington Foods, Inc.	Western	Direct	D1086-4	1930 California Avenue, Corona, CA 92881	311999	SIU	403.5(d)	-	6	13	16			SIU Permit Issued
Western Arlington Desalter	SAWPA	Direct	D1088-4.1	11611 Sterling Avenue, Riverside, CA 92503	221310	SIU	403.5(d)	-	4	8	4			
WRCRWA South Regional Pumping Station	SAWPA	Direct - Emergency	E1089-2.1	671 N. Lincoln Ave., Corona, CA 92880	221320	SIU	403.5(d)	-	0	0	0			Permit Closed 10/29/2020

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2020 – JUNE 30, 2021
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
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-4	880 W. County Line, Road, Calimesa, CA 92320	221310 , 221320	SIU	403.5(d)	-	4	8	8			

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	I1003-4	Angelica Textile Services	IU 40 CFR 403.5(d)	N/A									X																	
Western	D1074-4	Anita B. Smith Treatment Facility	SIU 40 CFR 403.5(d)	0.03									X																	
Western	D1004-1.1	Aramark Uniform & Career Apparel, LLC	SIU 40 CFR 403.5(d)	0.33								X		X			X				X			X	X	X			X	
IEUA	I1005-3	C.C. Graber Company	IU 40 CFR 403.5(d)	N/A										X																Sand Filters, Cartridge Filters
IEUA	D1006-4	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)	0.4											X															Grease Interceptors and Sewage Grinder
SAWPA	D1081-4	Chino I Desalter	SIU 40 CFR 403.5(d)	2.05										X																
SAWPA	D1010-4	Chino II Desalter	SIU 40 CFR 403.5(d)	2.02										X																

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	D1129-1	City of Beaumont Wastewater Treatment Plant	SIU 40 CFR 403.5(d)	0.55									X																	
Valley District	D1002-4	City of Colton - Agua Mansa Power Plant	SIU 40 CFR 403.5(d)	0.062														X												Ultra-Filtration & Reverse Osmosis
Western	E1013-2.1	City of Corona Water Reclamation Facility No. 1	SIU 40 CFR 403.5(d)	N/A									X																	Permit Closed 8/30/20
Western	D1125-3	City of Corona's Ion Exchange Treatment Plant	SIU 40 CFR 403.5(d)	0.2									X																	Permit Closed 2/25/21
Western	I1016-4	Corona Regional Medical Center	IU 40 CFR 403.5(d)	N/A									X																	
Western	D1019-4	Dart Container Corporation	SIU 40 CFR 403.5(d)	0.03								X		X							X	X								
Western	I1020-3	Decra Roofing Systems	IU 40 CFR 403.5(d)	N/A								X		X								X	X		X					
JCSD	D1021-3	Del Real, LLC	SIU 40 CFR 403.5(d)	0.19			X					X		X	X						X			X						DAF & Automated Chemical Feed

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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
IEUA	I1024-3	Eastside Water Treatment Facility	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	E1068-2.1	EMWD Energy Dissipater	SIU 40 CFR 403.5(d)	9.5									X																	Permit Closed 11/10/2020
SAWPA	D1061-4	EMWD Perris & Menifee Desalination Facility	SIU 40 CFR 403.5(d)	3.5									X																	Filtration, Green Sand for Iron & Manganese
SAWPA	E1067-3.1	EMWD Railroad Canyon Pipeline	SIU 40 CFR 403.5(d)	9.5									X																	Permit Closed 12/9/2020
Western	D1029-3	Frutarom USA, Inc.	IU 40 CFR 403.5(d)	2.15								X	X				X				X	X								
Western	I1031-3	Giuliano & Sons Briners	SIU 40 CFR 403.5(d)	0.01								X	X								X	X		X						Permit Closed 11/4/2020
IEUA	D1032-3	Green River Golf Club	IU 40 CFR 403.5(d)	0.02											X															Grease Interceptor
Western	I1121-2	Hidden Villa Ranch	IU 40 CFR 403.5(d)	N/A									X																	Permit Closed 5/26/21

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	E1037-2.1	IEUA Los Serranos	SIU 40 CFR 403.5(d)	N/A									X																	Permit Closed 11/27/2020
EMWD	I1133-1	Indian Oaks Campground, LLC	IU 40 CFR 403.5(d)	N/A									X																	
EMWD	I1039-4	Infineon Technologies Americas Corporation	CIU 40 CFR 469.18	N/A										X							X					X				
SAWPA	E1041-2.1	JCSD Archibald Metering Station	SIU 40 CFR 403.5(d)	1.115									X																	Permit Closed 12/5/2020
SAWPA	E1042-2.1	JCSD Celebration Metering Station	SIU 40 CFR 403.5(d)	0.17									X																	Permit Closed 11/27/2020
SAWPA	E1043-2.1	JCSD Chandler Lift Station	SIU 40 CFR 403.5(d)	1.115									X																	Permit Closed 11/4/2020
SAWPA	D1044-4	JCSD Etiwanda Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	E1046-2.3	JCSD Hamner Lift Station	SIU 40 CFR 403.5(d)	0.94									X																	Permit Closed 11/19/2020

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	D1045-4	JCSD Hamner Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	E1047-2.3	JCSD Harrison Metering Station	SIU 40 CFR 403.5(d)	0.94									X																	Permit Closed 11/20/2020
SAWPA	D1070-5	JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SIU 40 CFR 403.5(d)	0.3							X																			
SAWPA	E1113-1.1	JCSD Scholar Way Metering Station	SIU 40 CFR 403.5(d)	1.115									X																	Permit Closed 11/14/2020
SAWPA	D1040-4	JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SIU 40 CFR 403.5(d)	0.3									X																	
SAWPA	D1048-4	JCSD Wineville Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
Western	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

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	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	D1056-3	Metal Container Corporation	CIU 40 CFR 465.45(d)	0.165								X		X				X					X	X		X	X			Oil Skimming
IEUA	D1057-4	Mission Linen Supply	SIU 40 CFR 403.5(d)	0.713								X		X										X		X				Shaker Screens
Valley District	D1058-3	Mountainview Generating Station	CIU 40 CFR 423.17	0.432			X							X				X			X		X							Filtration
IEUA	I1114-2	Niagra Bottling, LLC (IEUA)	SIU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1111-2	Niagra Bottling, LLC (SBMWD)	SIU 40 CFR 403.5(d)	N/A									X																	
IEUA	D1059-3	OLS Energy	CIU 40 CFR 423.17	0.13										X				X												

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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
Western	I1062-4	Prudential Overall Supply	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1079-4	Pyrite Canyon Treatment Facility	SIU 40 CFR 403.5(d)	0.259								X		X				X								X				Air Strippers, Pesticide Co-Precipitation, I line Cloth Filters, Granulated Activate Carbon Absorption
Western	I1064-4	Qualified Mobile, Inc.	IU 40 CFR 403.5(d)	N/A										X							X	X								
SBMWD	I1066-3	Rayne Water Conditioning	SIU 40 CFR 403.5(d)	N/A			X																							EC Meter and Diversion Valve
IEUA	D1069-4.1	Repet, Inc.	SIU 40 CFR 403.5(d)	0.043								X		X							X		X	X		X	X			GEM., Drum & Shaker Screens
Valley District	D1130-1	Rialto Bioenergy Facility, LLC	SIU 40 CFR 403.5(d)	0.25								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 2020-2021
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
Western	I1128-1	Saratoga Foods Specialties - Eastvale	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	E1075-2.2	SBMWD Water Reclamation Plant	SIU 40 CFR 403.5(d)	2.5																							X		Permit Closed 10/26/2020	
SAWPA	D1124-1	SCE Mira Loma Peaker Plant	IU 40 CFR 403.5(d)	N/A													X													
Western	I1078-5	Sierra Aluminum Company, Inc.	IU 40 CFR 403.5(d)	N/A									X																	
Western	D1012-4	Temescal Desalter	SIU 40 CFR 403.5(d)	2.15									X																	
Western	D1086-4	Wellington Foods, Inc.	SIU 40 CFR 403.5(d)	0.03							X		X								X	X								
SAWPA	D1088-4.1	WMWD Arlington Desalter	SIU 40 CFR 403.5(d)	1.4									X																	
SAWPA	E1089-2.1	WRCRWA South Regional Pumping Station	SIU 40 CFR 403.5(d)	N/A									X																Permit Closed 10/29/20 Chlorination	

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2020-2021
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	D1090-4	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, 2020 - June 30, 2021



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		
Angelica Textile Services	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. I1003-4	4	0	0	0	0	0	0	CAC		
Anita B. Smith Treatment Facility	1	1	0	2	0	0	0	CAC		
2100 Fleetwood Drive	2	1	0	2	0	2	0	CAC		
Jurupa Valley, CA 92509	3	1	0	0	0	0	0	CAC		
Permit No. D1074-4	4	1	0	2	0	2	0	CAC		
Aramark Uniform & Career Apparel, LLC	1	3	1	3	3	4	0	CAC		
1135 Hall Avenue	2	1	1	3	3	4	0	CAC		
Riverside, CA 92509	3	1	1	2	6	6	0	IAC	1	NOV: lead violation
Permit No. D1004-1.1	4	1	1	2	4	4	0	CAC		
C.C. Graber Company	1	0	0	0	0	0	0	CAC		
315 E. 4th Street	2	1	0	8	0	11	0	CAC		
Ontario, CA 91764	3	1	0	0	0	0	0	CAC		
Permit No. I1005-3	4	0	0	0	0	0	0	CAC		
California Institution for Men	1	1	1	0	3	4	0	CAC		
5997 Edison Avenue	2	1	1	2	3	3	0	CAC		
Chino, CA 91710	3	1	1	2	3	4	0	CAC		
Permit No. D1006-4	4	1	1	2	3	3	0	CAC		
California Institution for Women	1	1	3	6	3	7	0	CAC		
16756 Chino Corona Road	2	1	3	7	3	6	0	CAC		
Corona, CA 92880	3	1	3	6	3	7	0	CAC		
Permit No. D1007-4	4	1	3	7	3	6	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. D1081-4	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	3	0	CAC		
Permit No. D1010-4	4	1	2	2	0	0	0	CAC		
City of Beaumont Wastewater Treatment Plant	1	1	0	0	0	0	0	CAC		Permit Issued 8/6/20
715 East 4th Street	2	1	1	1	6	10	0	CAC		
Beaumont, CA 92223	3	1	1	1	1	1	0	CAC		
Permit No. D1129-1	4	1	0	0	0	0	0	CAC		

COMPLIANCE STATUS	
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Appendix J
Monitoring and Compliance Status Report
July 1, 2020 - June 30, 2021



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		
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. D1002-4	4	1	1	4	1	4	0	CAC		
City of Corona Ion Exchange Treatment Plant	1	1	1	1	1	1	0	CAC		
410 Rimpau Avenue	2	1	1	1	0	0	0	CAC		
Corona, CA 92882	3	1	0	0	0	0	0	CAC		Permit Closed 2/25/21
Permit No. D1125-3	4	0	0	0	0	0	0	CAC		
City of Corona Water Reclamation Facility No. 1	1	0	0	0	0	0	0	CAC		Permit Closed 8/30/21
2205 Railroad Street	2	0	0	0	0	0	0	CAC		
Corona, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1013-2.1	4	0	0	0	0	0	0	CAC		
Corona Regional Medical Center	1	0	0	2	0	0	0	CAC		
800 S. Main Street	2	0	0	0	0	0	0	CAC		
Corona, CA 92882	3	1	0	2	0	2	0	CAC		
Permit No. I1016-4	4	0	0	0	0	0	0	CAC		
Dart Container Corporation	1	1	2	2	0	0	0	CAC		
150 S. Maple Street	2	1	3	2	1	1	0	CAC		
Corona, CA 92880	3	1	3	3	0	0	0	CAC		
Permit No. D1019-4	4	1	3	3	1	1	0	CAC		
Decra Roofing Systems	1	0	0	0	0	7	0	CAC		
1230 Railroad Street	2	1	0	3	0	6	0	CAC		
Corona, CA 92882	3	0	0	0	0	7	0	CAC		
Permit No. I1020-3	4	1	0	3	0	9	0	CAC		
Del Real, LLC	1	1	4	3	4	6	0	CAC		
11041 Inland Avenue	2	3	9	12	4	6	0	CAC		
Jurupa Valley, CA 91752	3	1	4	3	4	6	0	CAC		
Permit No. D1021-4	4	1	4	3	4	3	0	CAC		
Eastside Water Treatment Plant	1	1	0	0	0	14	0	CAC		
7537 Schaefer Avenue	2	1	0	2	0	12	0	CAC		
Ontario, CA 91761	3	1	0	6	0	16	0	CAC		
Permit No. I1024-3	4	1	0	3	0	14	0	CAC		
EMWD Energy Dissipater	1	0	0	0	0	0	0	CAC		
636 Minthorn Road	2	0	0	0	0	0	0	CAC		Permit Closed 11/10/20
Lake Elsinore, CA 92530	3	0	0	0	0	0	0	CAC		
Permit No. E1068-2.1	4	0	0	0	0	0	0	CAC		

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Appendix J
Monitoring and Compliance Status Report
July 1, 2020 - June 30, 2021



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			Composite	Grab	Composite	Grab	Composite	Quarterly		
EMWD Perris & Menifee Desalination Facility	1	1	1	1	1	1	0	CAC		
29541 Murrieta Road	2	1	1	1	0	0	0	CAC		
Menifee, CA 92586	3	1	1	1	1	1	0	CAC		
Permit No. D1061-4	4	1	1	1	0	0	0	CAC		
EMWD Railroad Canyon Pipeline	1	1	0	0	0	0	0	CAC		
Railroad Canyon Rd / Canyon Lake	2	0	0	0	0	0	0	CAC		Permit Closed 12/9/20
Canyon Lake, CA 92587	3	0	0	0	0	0	0	CAC		
Permit No. E1067-3.1	4	0	0	0	0	0	0	CAC		
Frutarom USA, Inc.	1	1	1	2	3	3	0	CAC		
790 E. Harrison Street	2	0	1	1	3	4	0	CAC		
Corona, CA 92879	3	0	1	2	3	3	0	CAC		
Permit No. D1029-3	4	1	1	1	3	4	0	CAC		
Giuliano & Sons Briners	1	1	0	2	0	0	0	CAC		
10380 Alder Avenue	2	1	0	0	0	0	0	CAC		Permit Closed 11/4/20
Bloomington, CA 92316	3	0	0	0	0	0	0	CAC		
Permit No. I1031-3	4	0	0	0	0	0	0	CAC		
Green River Golf Club	1	1	1	1	3	3	0	IAC	1	NOV/OCA: grease interceptor maintainance
5215 Green River Road	2	0	0	0	3	3	0	CAC		
Corona, CA 92880	3	0	0	0	3	3	0	CAC		
Permit No. D1032-3	4	1	1	3	4	4	0	CAC		
Hidden Villa Ranch	1	0	0	0	0	3	0	CAC		
1811 Mountain Avenue	2	1	0	3	0	3	0	CAC		
Norco, CA 92860	3	1	0	0	0	4	0	CAC		
Permit No. I1121-2	4	1	0	0	0	0	0	CAC		Permit Closed 5/26/21
IEUA (Los Serranos)	1	0	0	0	0	0	0	CAC		
6075 Kimball Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 11/27/20
Chino, CA 91708	3	0	0	0	0	0	0	CAC		
Permit No. E1037-2.1	4	0	0	0	0	0	0	CAC		
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	2	0	0	0	CAC		Permit Issued 1/27/21
Permit No. I1133-1	4	0	0	0	0	0	0	CAC		
Infineon Technologies Americas Corp.	1	1	1	1	1	1	0	CAC		
41915 Business Park Drive	2	1	2	3	1	1	0	CAC		
Temecula, CA 92590	3	1	1	1	1	1	0	CAC		
Permit No. I1039-4	4	1	1	1	1	1	0	CAC		

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Appendix J
Monitoring and Compliance Status Report
July 1, 2020 - June 30, 2021



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			Composite	Grab	Composite	Grab	Composite	Quarterly		
JCSD Archibald Metering Station	1	0	0	0	0	0	0	CAC		
6990 Archibald Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 12/5/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1041-2.1	4	0	0	0	0	0	0	CAC		
JCSD Celebration Metering Station	1	0	0	0	0	0	0	CAC		
5972 Hamner Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 11/27/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1042-2.1	4	0	0	0	0	0	0	CAC		
JCSD Chandler Lift Station	1	0	0	0	0	0	0	CAC		
14087 Chandler Street	2	0	0	0	0	0	0	CAC		Permit Closed 11/4/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1043-2.1	4	0	0	0	0	0	0	CAC		
JCSD Etiwanda Metering Station	1	1	3	5	3	3	0	CAC		
Etiwanda Ave. and north of Bellegrave Ave.	2	1	5	9	3	4	0	CAC		
Jurupa Valley, CA 91752	3	1	3	5	4	3	0	CAC		
Permit No. D1044-4	4	1	3	9	3	3	0	CAC		
JCSD Hamner Lift Station	1	0	0	0	0	0	0	CAC		
7302 Hamner Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 11/19/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1046-2.3	4	0	0	0	0	0	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. D1045-4	4	1	1	3	1	3	0	CAC		
JCSD Harrison Metering Station	1	0	0	0	0	0	0	CAC		
6998 Harrison Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 11/20/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1047-2.3	4	0	0	0	0	0	0	CAC		
JCSD Roger D. Teagarden Ion Exchange WTP	1	1	1	1	1	3	0	CAC		
4150 Etiwanda Avenue	2	1	1	1	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	0	0	0	0	0	CAC		
Permit No. D1070-5	4	1	1	1	0	0	0	CAC		
JCSD Scholar Way Metering Station	1	0	0	0	0	0	0	CAC		
6980 Scholar Way	2	0	0	0	0	0	0	CAC		Permit Closed 11/14/20
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1113-1.1	4	0	0	0	0	0	0	CAC		

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July 1, 2020 - June 30, 2021



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			Composite	Grab	Composite	Grab	Composite	Quarterly		
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. D1040-4	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	3	0	CAC		
Permit No. D1048-4	4	1	1	3	3	3	0	CAC		
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	2	0	CAC		
Permit No. I1050-4	4	1	0	2	0	0	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	3	0	CAC		
Permit No. I1052-4	4	0	0	0	0	0	0	CAC		
Magnolia Foods	1	1	3	0	1	5	0	CAC		
11058 Philadelphia Avenue	2	2	4	4	0	0	0	CAC		
Mira Loma, CA 91752	3	1	3	0	1	3	0	CAC		
Permit No. D1053-3	4	1	4	3	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	1	1	5	0	CAC		
Permit No. D1056-3	4	1	4	5	1	1	0	CAC		
Mission Linen Supply	1	1	3	7	4	7	0	CAC		
5400 Alton Street	2	1	3	7	3	7	0	CAC		
Chino, CA 91710	3	1	3	7	3	7	0	CAC		
Permit No. D1057-4	4	1	3	7	3	7	0	CAC		
Mountainview Generating Station	1	1	2	4	2	4	0	CAC		
2492 W. San Bernardino Avenue	2	1	2	3	2	3	0	CAC		
Redlands, CA 92374	3	1	2	3	2	4	0	CAC		
Permit No. D1058-3	4	1	2	4	2	3	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, 2020 - June 30, 2021



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		
Niagara Bottling, LLC (IEUA)	1	0	0	0	0	7	0	CAC		
1401 N. Alder Avenue	2	1	0	3	0	7	0	CAC		
Rialto, CA 92376	3	0	0	0	0	7	0	CAC		
Permit No. I1114-2	4	1	0	3	0	7	0	CAC		
Niagara Bottling, LLC (SBMWD)	1	1	0	6	0	6	0	CAC		
1401 N. Alder Avenue	2	1	0	6	0	7	0	CAC		
Rialto, CA 92376	3	1	0	6	0	8	0	CAC		
Permit No. I1111-2	4	1	0	6	0	7	0	IAC	1	NOV: past due report
OLS Energy	1	1	2	4	4	8	0	CAC		
5601 Eucalyptus Avenue	2	1	1	9	4	6	0	CAC		
Chino, CA 91710	3	1	2	5	4	10	0	IAC	1	Administrative Complaint: TTO violation
Permit No. D1059-3	4	1	2	8	4	6	0	CAC		
Prudential Overall Supply	1	0	0	0	0	0	0	CAC		
6997 Jurupa Ave	2	1	0	0	0	0	0	IAC	1	NOV: unpermitted discharge
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	8	18	51	0	CAC		
3400 Pyrite Street	2	1	2	9	18	52	0	CAC		
Jurupa Valley, CA 92509	3	1	2	7	18	48	0	CAC		
Permit No. D1079-4	4	1	3	10	19	49	1	CAC		
Qualified Mobile, Inc.	1	0	0	0	0	0	0	CAC		
1623 Industrial Ave.	2	0	0	0	0	0	0	CAC		
Norco, CA 92860	3	1	0	2	0	2	0	CAC		
Permit No. I1064-4	4	0	0	0	0	0	0	CAC		
Rayne Water Conditioning	1	2	0	20	0	5	0	IAC	2	NOV: copper violation
939 West Reece Street	2	1	0	6	0	4	0	CAC		
San Bernardino, CA 92411	3	1	0	8	0	17	0	IAC	1	MPIO: copper violation
Permit No. I1066-3	4	1	0	6	0	1	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	1	3	7	3	16	0	IAC	3	NOV, Violation Meeting: dissolved sulfide violation
Permit No. D1069-4.1	4	1	3	7	3	12	0	CAC		
Rialto Bioenergy Facility, LLC	1	0	0	0	0	0	0	CAC		
503 E. Santa Ana Avenue	2	2	0	0	22	38	0	CAC		Permit Issued 12/7/20
Bloomington, CA 92316	3	2	1	5	77	96	0	IAC	3	NOV: BOD, pH, TSS violations
Permit No. D1130-1	4	1	1	5	80	78	0	IAC	1	Compliance Order

COMPLIANCE STATUS	
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Appendix J
Monitoring and Compliance Status Report
July 1, 2020 - June 30, 2021



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		
San Antonio Regional Hospital	1	1	0	0	0	6	0	CAC		
999 San Bernardino Road	2	1	0	3	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	0	0	0	0	0	0	CAC		
6285 Providence Way	2	1	0	6	0	3	0	CAC		
Eastvale, CA 92880	3	0	0	0	0	1	0	CAC		
Permit No. I1128-1	4	1	0	3	0	6	0	CAC		
SBMWD Water Reclamation Plant	1	0	0	0	0	0	0	CAC		
399 Chandler Place	2	0	0	0	0	0	0	CAC		Permit Closed 10/26/20
San Bernardino, CA 92408	3	0	0	0	0	0	0	CAC		
Permit No. E1075-2.2	4	1	0	0	0	0	0	CAC		
SCE Mira Loma Peaker Plant	1	0	0	0	0	0	0	CAC		
13568 S. Milliken Avenue	2	0	0	0	0	0	0	CAC		
Ontario, CA 91762	3	0	0	0	0	0	0	CAC		Permit Issued 3/16/21
Permit No. D1124-1	4	1	0	5	0	5	0	CAC		
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	1	0	3	0	0	0	CAC		
Permit No. I1078-5	4	0	0	0	0	2	0	CAC		
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	2	1	0	CAC		
Permit No. D1012-4	4	1	1	1	0	0	0	IAC	1	NOV: pH violation
Wellington Foods, Inc.	1	2	2	2	1	1	0	CAC		
1930 California Avenue	2	2	2	2	1	1	0	CAC		
Corona, CA 92881	3	1	2	1	3	3	0	CAC		
Permit No. D1086-4	4	1	1	1	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. D1088-4.1	4	1	1	1	0	0	0	CAC		
WRCRWA South Regional Pumping Station	1	0	0	0	0	0	0	CAC		
671 N. Lincoln Avenue	2	0	0	0	0	0	0	CAC		Permit Closed 10/29/20
Corona, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. E1089-2.1	4	0	0	0	0	0	0	CAC		

COMPLIANCE STATUS

ID - Insufficient Data	SNC - Significant Non Compliance
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IAC - Inconsistently Achieving Compliance	WW - Written Warning



Appendix J
Monitoring and Compliance Status Report
July 1, 2020 - June 30, 2021



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		
YVWD Henry Wochholz RWRP	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. D1090-4	4	1	1	1	1	1	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 I. QA/QC Analysis Results

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JULY 2020
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)
Sampler A	2236753	0.02	0.02	0.02	0.02	0.02	0.02	0.04	
	2236754	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
	2236755	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
Sampler B	2236756	0.02	0.02	0.02	0.02	0.02	0.02	0.02	
	2236757	0.02	0.02	0.02	0.02	0.02	0.02	0.02	
	2236758	0.02	0.02	0.02	0.02	0.02	0.02	0.02	
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.48	Avg. Deviation	
									0.08
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-021735	2239370		0.02	0.02	<i>1.06</i>	0.09	0.02	0.02	
		2199444	0.02	0.02	<i>0.91</i>	0.08	0.02	0.02	
					14.79				Relative % Difference
1-511378	2239371		0.02	0.02	0.06	0.02	0.02	0.05	
		2118517	0.02	0.02	0.06	0.02	0.02	0.06	
									Relative % Difference
1-021088	2239372		0.02	0.02	<i>0.14</i>	0.03	0.02	0.26	
		2199980	0.02	0.02	<i>0.14</i>	0.03	0.02	0.25	
					0.00			3.92	Relative % Difference
1-011036	2239373		0.02	0.06	<i>0.42</i>	<i>0.22</i>	0.02	0.03	
		2199141	0.02	0.06	<i>0.40</i>	<i>0.20</i>	0.02	0.05	
					4.88	9.52			Relative % Difference
			0%	0%	7%	10%	0%	4%	Analyte Avg. RPD
								3%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR AUGUST 2020
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)
Sampler A	2245830	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
	2245831	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
	2245832	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
Sampler B	2245833	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
	2245834	0.02	0.02	0.02	0.02	0.02	0.02	0.03	
	2245835	0.02	0.02	0.02	0.02	0.02	0.02	0.02	
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.0	0.0	0.0	0.0	0.0	0.5	Avg. Deviation	
									0.1
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-521793	2245888		0.02	0.02	<i>0.17</i>	0.02	0.02	<i>0.12</i>	
		2207571	0.02	0.02	<i>0.20</i>	0.02	0.02	<i>0.12</i>	
					16.2			0.0	Relative % Difference
1-021016	2206978		0.02	0.02	0.02	0.02	0.02	0.05	
		2206978	0.02	0.02	0.02	0.02	0.02	0.07	
									Relative % Difference
1-521783	2245890		0.02	0.02	0.04	0.02	0.02	0.02	
		2206985	0.02	0.02	0.04	0.02	0.02	0.04	
									Relative % Difference
1-021045	2245891		0.02	0.02	0.07	0.02	0.02	0.06	
		2205418	0.02	0.02	0.07	0.02	0.02	0.06	
									Relative % Difference
			0%	0%	16%	0%	0%	0%	Analyte Avg. RPD
								3%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR SEPTEMBER 2020
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2251980	0.02	0.02	0.02	0.02	0.02	0.03		
	2251981	0.02	0.02	0.02	0.02	0.02	0.03		
	2251982	0.02	0.02	0.02	0.02	0.02	0.03		
Sampler B	2251983	0.02	0.02	0.02	0.02	0.02	0.03		
	2251984	0.02	0.02	0.02	0.02	0.02	0.03		
	2251985	0.02	0.02	0.02	0.02	0.02	0.03		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.27	Avg. Deviation	
									0.04
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-021187	2251988		0.02	0.02	1.56	0.02	0.02	0.09	
		2216887	0.02	0.02	1.52	0.02	0.02	0.09	
					2.60				Relative % Difference
1-021121	2251989		0.02	0.02	0.15	0.02	0.02	0.02	
		2214795	0.02	0.02	0.14	0.02	0.02	0.02	
					6.90				Relative % Difference
1-031106	2251991		0.02	0.02	0.02	0.02	0.02	0.56	
		2216952	0.02	0.02	0.02	0.02	0.02	0.53	
								5.50	Relative % Difference
1-031341	2251990		0.02	0.07	0.05	0.26	0.02	0.02	
		2216957	0.02	0.05	0.04	0.22	0.02	0.02	
						16.67			Relative % Difference
			0%	0%	5%	17%	0%	6%	Analyte Avg. RPD
								4%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR OCTOBER 2020
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	0.02	0.02	0.02		
Sampler A	2255692	0.02	0.02	0.02	0.02	0.02	0.02		
	2255693	0.02	0.02	0.02	0.02	0.02	0.02		
	2255694	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2255695	0.02	0.02	0.02	0.02	0.02	0.02		
	2255696	0.02	0.02	0.02	0.02	0.02	0.02		
	2255697	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600243	2257313		0.02	0.03	0.10	0.02	0.02	<i>0.12</i>	
		2220798	0.02	0.03	0.10	0.02	0.02	<i>0.12</i>	
								2.53	Relative % Difference
1-521756	2257276		0.02	0.02	0.02	0.02	0.02	<i>0.30</i>	
		2224771	0.02	0.02	0.02	0.02	0.02	<i>0.31</i>	
								3.90	Relative % Difference
1-011038	2257264		0.02	0.02	0.05	0.02	0.02	0.06	
		2220612	0.02	0.02	0.05	0.02	0.02	0.06	
									Relative % Difference
1-521798	2257275		0.02	<i>0.43</i>	<i>0.21</i>	<i>0.24</i>	0.02	<i>0.15</i>	
		2219421	0.02	<i>0.41</i>	<i>0.21</i>	<i>0.22</i>	0.02	<i>0.25</i>	
				4.76	0.00	8.70		50.00	Relative % Difference
			0%	5%	0%	9%	0%	19%	Analyte Avg. RPD
								5%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR NOVEMBER 2020
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2265062	0.02	0.02	0.02	0.02	0.02	0.02		
	2265063	0.02	0.02	0.02	0.02	0.02	0.03		
	2265064	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2265065	0.02	0.02	0.02	0.02	0.02	0.03		
	2265066	0.02	0.02	0.02	0.02	0.02	0.03		
	2265067	0.02	0.02	0.02	0.02	0.02	0.03		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.48	Avg. Deviation	
									0.08
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-031049	2265069		0.02	0.02	0.35	0.02	0.53	0.03	
		2225320	0.02	0.02	0.28	0.02	0.56	0.03	
					22.22		5.50		Relative % Difference
1-021706	2265070		0.02	0.02	0.48	0.02	0.56	0.20	
		2228449	0.02	0.02	0.48	0.02	0.56	0.23	
					0.00		0.00	13.95	Relative % Difference
1-011069	2265071		0.02	0.02	0.08	0.02	0.56	0.02	
		2227242	0.02	0.02	0.09	0.02	0.56	0.02	
							0.00		Relative % Difference
1-021325	2265574		0.02	0.22	1.03	1.63	0.06	0.18	
		2227151	0.02	0.22	1.03	1.66	0.06	0.18	
				0.00	0.00	1.82		0.00	Relative % Difference
			0%	0%	7%	2%	2%	7%	Analyte Avg. RPD
								3%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR DECEMBER 2020
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	0.02	0.02	0.02		
Sampler A	2270193	0.02	0.02	0.02	0.02	0.02	0.02		
	2270194	0.02	0.02	0.02	0.02	0.02	0.02		
	2270195	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2270196	0.02	0.02	0.02	0.02	0.02	0.02		
	2270197	0.02	0.02	0.02	0.02	0.02	0.02		
	2270200	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-071235	2268082		0.02	0.02	0.21	0.04	0.05	0.64	
		2227037	0.02	0.03	0.22	0.04	0.06	0.73	
					4.65			13.14	Relative % Difference
1-600272	2268087		0.02	0.03	0.21	0.02	0.02	0.03	
		2227164	0.02	0.03	0.20	0.02	0.02	0.04	
					4.88				Relative % Difference
1-011030	2268088		0.02	0.02	0.21	0.02	0.02	0.02	
		2227247	0.02	0.02	0.20	0.02	0.02	0.02	
					4.88				Relative % Difference
1-511381	2268089		0.06	0.18	0.42	0.10	0.02	0.22	
		2225176	0.05	0.17	0.39	0.09	0.02	0.24	
				5.71	7.41			8.70	Relative % Difference
			0%	6%	5%	0%	0%	11%	Analyte Avg. RPD
							4%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JANUARY 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2284962	0.02	0.02	0.02	0.02	0.02	0.02		
	2284963	0.02	0.02	0.02	0.02	0.02	0.02		
	2284964	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2284965	0.02	0.02	0.02	0.02	0.02	0.02		
	2284966	0.02	0.02	0.02	0.02	0.02	0.03		
	2284967	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.37	Avg. Deviation	
									0.06
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-021290	2285097		0.02	0.02	0.03	0.02	0.02	0.28	
		2245902	0.02	0.02	0.03	0.02	0.02	0.25	
								11.32	Relative % Difference
1-071172	2285098		0.02	0.02	0.02	0.02	0.02	0.03	
		2240634	0.02	0.02	0.02	0.02	0.02	0.02	
									Relative % Difference
1-571292	2284969		0.02	0.02	0.02	0.02	0.02	0.02	
		2245197	0.02	0.02	0.02	0.02	0.02	0.02	
									Relative % Difference
1-521805	2284968		0.02	0.02	0.03	0.02	0.02	1.20	
		2245197	0.02	0.02	0.03	0.02	0.02	1.12	
								6.90	Relative % Difference
			0%	0%	0%	0%	0%	9%	Analyte Avg. RPD
								2%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR FEBRUARY 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2289151	0.02	0.02	0.02	0.02	0.02	0.02		
	2289152	0.02	0.02	0.02	0.02	0.02	0.02		
	2289153	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2289154	0.02	0.02	0.02	0.02	0.02	0.02		
	2289155	0.02	0.02	0.02	0.02	0.02	0.02		
	2289156	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-111129	2289150		0.02	0.02	0.68	0.02	0.04	0.05	
		2247251	0.02	0.02	0.64	0.02	0.04	0.04	
					6.06				Relative % Difference
1-071037	2289149		0.02	0.33	0.02	0.02	0.02	0.04	
		2251922	0.02	0.32	0.02	0.02	0.02	0.04	
				3.08					Relative % Difference
1-600316	2289147		0.02	0.02	0.03	0.50	0.02	0.07	
		2289147	0.02	0.02	0.03	0.47	0.02	0.04	
						6.19			Relative % Difference
1-061115	2289148		0.02	0.13	0.08	0.09	0.02	0.03	
		2251865	0.02	0.13	0.09	0.10	0.02	0.03	
				0.00					Relative % Difference
			0%	2%	6%	6%	0%	0%	Analyte Avg. RPD
								2%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MARCH 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2293368	0.02	0.02	0.02	0.02	0.02	0.02		
	2293369	0.02	0.02	0.02	0.02	0.02	0.02		
	2293370	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2293371	0.02	0.02	0.02	0.02	0.02	0.02		
	2293372	0.02	0.02	0.02	0.02	0.02	0.02		
	2293373	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-511366	2293377		0.02	0.02	2.50	0.15	0.02	0.02	
		2255948	0.02	0.02	2.24	0.15	0.02	0.02	
					10.97	0.00			Relative % Difference
1-031311	2293380		0.02	0.02	0.02	0.02	0.02	0.02	
		2255655	0.02	0.02	0.02	0.02	0.02	0.02	
									Relative % Difference
1-571295	2293382		0.02	0.02	0.10	0.02	0.02	0.02	
		2255599	0.02	0.02	0.10	0.02	0.02	0.05	
									Relative % Difference
1-021290	2294116		0.02	0.02	0.02	0.02	0.02	0.15	
		2254285	0.02	0.02	0.02	0.02	0.02	0.15	
								0.00	Relative % Difference
			0%	0%	11%	0%	0%	0%	Analyte Avg. RPD
								2%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR APRIL 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2302410	0.02	0.02	0.02	0.02	0.02	0.02		
	2302411	0.02	0.02	0.02	0.02	0.02	0.02		
	2302412	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2302413	0.02	0.02	0.02	0.02	0.02	0.02		
	2302414	0.02	0.02	0.02	0.02	0.02	0.02		
	2302415	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011073	2303173		0.02	0.02	0.19	0.03	0.02	0.02	
		2266367	0.02	0.02	0.18	0.03	0.02	0.07	
					5.41				Relative % Difference
1-061115	2302994		0.06	0.49	0.21	0.23	0.02	0.02	
		2266965	0.06	0.47	0.21	0.22	0.02	0.03	
				4.17	0.00	4.44			Relative % Difference
1-521852	2303177		0.02	0.55	0.59	1.82	0.02	0.13	
		2265644	0.02	0.55	0.57	1.81	0.02	0.12	
				0.00	3.45	0.55		8.00	Relative % Difference
1-031341	2303174		0.02	0.05	0.31	0.02	0.02	0.02	
		2266221	0.02	0.05	0.30	0.02	0.02	0.02	
					3.28				Relative % Difference
			0%	2%	3%	2%	0%	8%	Analyte Avg. RPD
								3%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MAY 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)	
Sampler A	2309147	0.02	0.02	0.02	0.02	0.02	0.02		
	2309148	0.02	0.02	0.02	0.02	0.02	0.02		
	2309149	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2309150	0.02	0.02	0.02	0.02	0.02	0.02		
	2309151	0.02	0.02	0.02	0.02	0.02	0.02		
	2309152	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600316	2309361		0.02	0.02	0.13	0.51	0.02	0.02	
		2268053	0.02	0.02	0.12	0.48	0.02	0.02	
					8.00	6.06			Relative % Difference
1-011046	2309362		0.02	0.27	1.02	0.14	0.02	0.02	
		2267060	0.02	0.25	0.98	0.12	0.02	0.02	
				7.69	4.00	15.38			Relative % Difference
1-521772	2309569		0.02	0.02	0.53	0.97	0.02	0.02	
		2266325	0.02	0.02	0.50	0.92	0.02	0.06	
					5.83	5.29			Relative % Difference
1-521801	2309363		0.02	0.06	0.16	0.06	0.02	0.02	
		2267047	0.02	0.06	0.15	0.06	0.02	0.06	
					6.45				Relative % Difference
			0%	8%	6%	9%	0%	0%	Analyte Avg. RPD
								4%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JUNE 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.02	0.02	Reporting Limit (mg/L)
Sampler A	2314638	0.02	0.02	0.02	0.02	0.02	0.02		
	2314639	0.02	0.02	0.02	0.02	0.02	0.02		
	2314640	0.02	0.02	0.02	0.02	0.02	0.02		
Sampler B	2314641	0.02	0.02	0.02	0.02	0.02	0.02		
	2314642	0.02	0.02	0.02	0.02	0.02	0.02		
	2314643	0.02	0.02	0.02	0.02	0.02	0.02		
Analysis results are reported in mg/L. Results at or above the RL are shown in bold font.		0.00	0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation
									0.00
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011100	2315361		0.02	<i>0.15</i>	<i>0.71</i>	0.02	0.02	<i>0.27</i>	
		2281264	0.02	<i>0.16</i>	<i>0.69</i>	0.02	0.02	<i>0.24</i>	
					6.45	2.86			11.76
1-011155	2315367		0.02	<i>0.14</i>	<i>0.10</i>	0.21	0.02	<i>0.12</i>	
		2281582	0.02	<i>0.15</i>	<i>0.10</i>	0.21	0.02	<i>0.13</i>	
					6.90	0.00		8.00	Relative % Difference
1-021336	2315370		0.02	<i>0.15</i>	<i>0.07</i>	0.46	0.02	0.02	
		2278894	0.02	<i>0.16</i>	<i>0.07</i>	0.46	0.02	0.02	
					6.45	0.00			Relative % Difference
1-021520	2315377		0.02	<i>0.04</i>	<i>0.23</i>	0.15	0.02	0.02	
		2278136	0.02	<i>0.04</i>	<i>0.23</i>	0.15	0.02	0.02	
					0.00	0.00			Relative % Difference
			0%	7%	1%	0%	0%	10%	Analyte Avg. RPD
								3%	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 at or above the RLs. Italic bold numbers are greater than 20 times the RLs. Comparisons are made only for results greater than 5 times the Reporting Limit.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2020/21
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JUL-SEP 2020									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2247256	0.00	0.00	0.39	0.04	0.00	0.00	6.9	2247257
	2246589	0.00	0.00	0.38	0.04	0.00	0.00	6.0	2246601
	2246592	0.00	0.00	0.36	0.04	0.00	0.00	5.6	2246599
	2246590	0.00	0.00	0.38	0.04	0.00	0.00	5.1	2246600
	2246591	0.00	0.00	0.38	0.04	0.00	0.00	5.3	2246605
	Average Range	0.00	0.00	0.38	0.04	0.00	0.00	5.8	Average Range
	0.00	0.00	0.02	0.00	0.00	0.00	1.8		
Sampler Average Deviation				0.53				0.5	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2246594	0.00	0.00	0.38	0.04	0.00	0.00	4.8	2246602
	2246595	0.00	0.00	0.38	0.05	0.00	0.00	4.5	2246603
	2246593	0.00	0.00	0.37	0.04	0.00	0.00	4.9	2246604
	2246596	0.00	0.00	0.39	0.05	0.00	0.00	4.7	2246606
	2246598	0.00	0.00	0.38	0.05	0.00	0.00	3.3	2246607
	Average Range	0.00	0.00	0.38	0.05	0.00	0.00	4.4	Average Range
	0.00	0.00	0.03	0.00	0.00	0.00	1.6		
Sampler Average Deviation				0.67					
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
				0.58				26.2	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.02	1.0	
SAMPLE COLLECTION CHECK RESULTS, OCT-DEC 2020									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2255502	0.00	0.03	0.00	0.00	0.00	1.53	31.0	2255515
	2255394	0.00	0.03	0.00	0.00	0.00	1.57	21.0	2255503
	2255393	0.00	1.34	0.00	0.17	0.00	0.04	20.0	2255504
	2255392	0.00	0.03	0.00	0.00	0.00	1.56	23.0	2255505
	2255387	0.00	0.03	0.00	0.00	0.00	1.45	17.0	2255506
	Average Range	0.00	0.29	0.00	0.03	0.00	1.23	22.4	Average Range
	0.00	1.31	0.00	0.17	0.00	1.53	14.0		
Sampler Average Deviation			41.89				47.50	3.7	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2255515	0.00	0.03	0.00	0.00	0.00	1.38	5.3	2255510
	2255503	0.00	0.03	0.00	0.00	0.00	1.38	18.0	2255509
	2255504	0.00	0.03	0.00	0.00	0.00	1.46	21.0	2255507
	2255505	0.00	0.03	0.00	0.00	0.00	1.46	20.0	2255508
	2255506	0.00	0.03	0.00	0.00	0.00	1.59	6.7	2255511
	Average Range	0.00	0.03	0.00	0.00	0.00	1.45	14.2	Average Range
	0.00	0.00	0.00	0.00	0.00	0.21	15.7		
Sampler Average Deviation							5.92	6.6	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
			163.50				16.64	44.8	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.02	1.0	

Results are shown only for results greater than 5 times the Reporting Limit. Bold numbers are at or above the RLs. Results and RLs are reported in mg/L.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2020/21
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JAN-MAR 2020									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2286062	0.00	0.00	0.41	0.00	0.00	0.03	22.0	2286063
	2285140	0.00	0.00	0.47	0.00	0.00	0.02	15.0	2285148
	2285139	0.00	0.00	0.50	0.00	0.00	0.02	24.0	2285151
	2285143	0.00	0.00	0.47	0.00	0.00	0.03	14.0	2285149
	2285141	0.00	0.00	0.46	0.00	0.00	0.02	16.0	2285150
	Average Range	0.00	0.00	0.46	0.00	0.00	0.02	18.2	Average Range
	0.00	0.00	0.09	0.00	0.00	0.01	10.0		
Sampler Average Deviation				2.08				3.8	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2285142	0.00	0.00	0.45	0.00	0.00	0.03	17.0	2285152
	2285144	0.00	0.00	0.48	0.00	0.00	0.02	15.0	2285153
	2285145	0.00	0.00	0.48	0.00	0.00	0.03	14.0	2285154
	2285146	0.00	0.00	0.44	0.00	0.00	0.03	18.0	2285155
	2285147	0.00	0.00	0.45	0.00	0.00	0.02	16.0	2285156
	Average Range	0.00	0.00	0.46	0.00	0.00	0.03	16.0	Average Range
	0.00	0.00	0.04	0.00	0.00	0.01	4.0		
Sampler Average Deviation				1.37				1.2	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
				0.13				12.9	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.02	1.0	
SAMPLE COLLECTION CHECK RESULTS, APR-JUN 2020									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2313345	0.00	0.03	0.00	0.00	0.00	0.54	11.0	2313346
	2309520	0.00	0.03	0.00	0.00	0.00	0.35	11.0	2312605
	2309521	0.00	0.03	0.00	0.00	0.00	0.36	10.0	2312606
	2309522	0.00	0.03	0.00	0.00	0.00	0.36	11.0	2312607
	2309523	0.00	0.03	0.00	0.00	0.00	0.35	10.0	2312609
	Average Range	0.00	0.03	0.00	0.00	0.00	0.39	10.6	Average Range
	0.00	0.00	0.00	0.00	0.00	0.19	1.0		
Sampler Average Deviation							0.06	0.5	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2309524	0.00	0.03	0.00	0.00	0.00	0.35	10.0	2312608
	2309525	0.00	0.03	0.00	0.00	0.00	0.34	10.0	2312610
	2309526	0.00	0.03	0.00	0.00	0.00	0.34	10.0	2312611
	2309527	0.00	0.03	0.00	0.00	0.00	0.35	10.0	2312612
	2309258	0.00	0.03	0.00	0.00	0.00	0.34	10.0	2312613
	Average Range	0.00	0.03	0.00	0.00	0.00	0.34	10.0	Average Range
	0.00	0.00	0.00	0.00	0.00	0.02	0.0		
Sampler Average Deviation							0.01	0.0	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
							12.68	5.8	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.02	1.0	

Results are shown only for results greater than 5 times the Reporting Limit. Bold numbers are 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 2020/21
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	
9W Halo Western opCo, L.P.	1-600378	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	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
ABE Corporation	S-601355	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	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	•	•
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), 471.65(e), 471.65(m), 471.65(n), 471.65(r), 471.65(s), 471.65(u), 471.65(w)	•	•	X	•	X	X	•	•	X	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	X	X	•	X
Alexander Oil Company	1-581185	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•
All Metals Processing of O.C., Inc.	1-031110	433.17(a)	•	•	•	•	•	X	•	•	X	•	•	X	•	•	•	X	X	•	•	X	•	•	•	•	X	X	•	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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	
Allied Electronics Services, Inc.	1-011073	433.17(a)	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	X	X	•	•	•	•	X	•	•	•	X	•	•
Alloy Die Casting Co.	1-531437	464.15(a), 464.15(b), 464.15(c), 464.15(h), 464.45(a), 464.45(b), 464.45(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	•	•	•	•	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	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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		
American Circuit Technology, Inc.	1-021249	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	X	•	X	•	•	X	•	•	•	X	X	•	
Amerimax Building Products, Inc.	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	•	•	•	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	
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	•	•	•	•	•	•	•	•	•	•	X	•	•
APCT Orange County	1-600503	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	X	•	•
ARO Service	1-021192	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Arrowhead Operating Inc.	1-601062	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
			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	•	•
Aseptic Technology, LLC (Landon)	1-600716	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
Astech Engineered Products, Inc. (Bldg. 1 & 2)	1-571295	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•
Auto-Chlor System of Washington, Inc.	1-511384	417.166	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•
Aviation Equipment Processing	1-071037	433.17(a)	•	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	X	•	X	•	•	•	•	•	X	X	•
Avid Bioservices, Inc.	1-571332	439.17, 439.27	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
B. Braun Medical Inc - Alton Pkwy Construction	S-601408	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
B. Braun Medical, Inc. (West/Lake)	1-541183	439.47, 463.16, 463.26, 463.36	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Basic Electronics, Inc.	1-031094	433.17(a)	•	•	•	•	X	•	X	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Bazz Houston Co.	1-031010	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Beckman Coulter, Inc.	1-521824	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Beo-Mag Plating	1-511370	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	X	•	X	•	•	X	•
Bimbo Bakeries U.S.A, Inc.	1-521838	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Black Oxide Industries, Inc.	1-021213	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	X	•	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
Bristol Industries	1-021226	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(ii), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	X	•	•	X	X	X
Brookfield SoCal Land Constructors LLC	S-601020	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Brothers International Desserts (North)	1-600583	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•
Brothers International Desserts (West)	1-600582	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•
Burlington Engineering, Inc.	1-521770	433.17(a)	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	X	•	•	•	X	•	•	•	•	X	•	•
Cadillac Plating, Inc.	1-021062	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	•	X	•	X	•	•	X	•	•	X	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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	•	•	•	•	•	•	•	•	•
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	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Corru-Kraft Fullerton	2-022319	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	•
Custom Enamellers, Inc.	1-021297	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Cytec Engineered Materials, Inc.	Z-600005	433.17(a)	•	•	•	•	X	X	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
D.F. Stauffer Biscuit Co., Inc.	1-600414	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
DAH Oil, LLC	1-581173	403.5(d)	•	•	•	•	•	•	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, LLC	1-600038	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
Electrolurgy, Inc.	1-071162	433.17(a)	•	•	X	•	•	X	•	•	X	•	•	X	X	•	•	•	X	•	X	•	•	X	•	•	X	•	•
Electron Plating Inc.	1-021336	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	•	X
Electronic Precision Specialties, Inc.	1-021337	433.17(a)	X	•	X	•	•	•	•	•	X	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	•	•	•
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	•	•	•	•	•	•	•	•
Excello Circuits Manufacturing Corp.	1-521855	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Excello Circuits, Inc. (Hunter)	1-601356	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Expo Dyeing and Finishing, Inc.	1-031322	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	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	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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	
			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	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Gemini Industries, Inc.	1-071172	415.26, 421.266(b), 421.266(e), 421.266(i), 421.266(j), 421.266(m), 421.266(n)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	X	X	X	•	•	•	•	•	•	X	X	•
Gemtech Coatings	Z-600544	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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 Aerospace	S-000790	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Howmet Global Fastening Systems Inc.	1-021081	433.15(a), 433.17(a), 467.46, 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(w), 471.65(x)	•	•	•	•	X	X	•	•	X	•	•	X	•	•	•	•	X	•	•	•	•	X	X	•	•	X	X	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	•
Imperial Plating	1-031106	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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	
Oakley, Inc.	1-141012	463.16, 463.26, 463.36	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	X	•
Omni Metal Finishing, Inc.	1-021520	433.17(a)	•	•	X	X	X	•	•	•	X	•	•	X	X	X	•	X	•	•	•	•	•	•	X	X	•	X	•	X
Omni Metal Finishing, Inc. (Building 4)	1-600981	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
Only Cremations for Pets (Newport Beach)	1-601084	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	
Orange County Water District GWRSFE Project Plant 2	S-601168	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Orange County Water District GWRSFE Project Plant 1	S-601169	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Pacific Image Technology, Inc.	1-021070	433.17(a)	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Pacific Western Container	1-511371	403.5(d)	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	X	•	•	•	X	X	•	•	•
Parker Hannifin Corporation	Z-600979	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•
Patio and Door Outlet, Inc.	1-521783	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•
Patriot Wastewater, LLC (Freedom CWT)	1-521861	437.47(b)	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	X	•	X	•	X	•	X	•	•	•	•	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	403.5(d)	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	•	•
Performance Powder, Inc.	1-521805	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Petroprize Corporation	1-581180	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Phillips 66 Company (La Habra)	S-601225	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Pier Oil Company, Inc.	1-581178	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Pioneer Circuits, Inc.	1-011262	433.17(a)	X	•	X	•	•	•	•	X	•	•	•	•	•	X	•	X	X	•	X	X	•	X	•	•	X	•	X
Platinum Surface Coating, Inc.	1-521852	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	X	•	•	•	•	X	•	•
Plegel Oil Company - (A.H.A.)	1-021176	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Powdercoat Professionals Inc.	Z-600275	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Power Distribution, Inc.	1-511400	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Powerdrive Oil & Gas Company, LLC (16th)	1-600246	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Powerdrive Oil & Gas Company, LLC (Surveyor)	1-600245	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Precious Metals Plating Co., Inc.	1-011265	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	X	X	X	•	•	•	•	•	•	•	•
Precision Anodizing & Plating, Inc.	1-521809	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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		
Precision Circuits West, Inc.	1-011008	433.17(a)	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	•	X
Precision Resource, California Division	1-111002	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•
Precon, Inc.	1-021581	403.5(d)	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	•
Prima-Tex Industries Inc.	1-031036	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Prudential Overall Supply	1-071235	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Pulmuone Foods USA, Inc. (West)	1-531397	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•
Quality Aluminum Forge, LLC (Cypress North)	1-521833	467.45	•	•	•	•	X	•	•	X	X	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	X	•	•	•
Quality Aluminum Forge, LLC (Cypress South)	1-600272	467.46	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	•	X	•	•
RBC Transport Dynamics Corp.	1-011013	433.17(a)	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	•	X	X	•	•	•	X	X	•	•	•	•	•	•
Republic Waste Services	1-521827	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Republic Waste Services of So. Cal., LLC	1-021169	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
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 South)	1-511412	439.47	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
			SPS Technologies LLC, DBA Cherry Aerospace	1-511381	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)	•	•	X	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	X	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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		
Stainless Micro-Polish, Inc.	1-021672	433.17(a)	•	•	•	•	X	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	X	•	X
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Star Powder Coating, Inc.	1-531425	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	
Statek Corporation (Main)	1-021664	433.17(a), 469.26(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Statek Corporation (Orange Grove)	1-521777	469.28(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Stremicks Heritage Foods, LLC	1-021028	405.16, 405.26, 405.76	•	•	•	•	•	•	•	X	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
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	
Superior Plating	1-021090	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	X	•	•	X	•	•	X	•	
Superior Processing	1-021403	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	X	•	X	•	X	•	•	•	•	•	X	•	•	•	•	•	•	
Tayco Engineering, Inc.	1-031012	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	X	X	
Taylor-Dunn Manufacturing Company	1-021123	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Thermal-Vac Technology, Inc.	1-021282	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	X	X	•	•	•	•	•	•	•	•	•	•	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2020/21
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
Vi-Cal Metals, Inc.	1-521846	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Warner Avenue Group, LLC.	S-601116	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•
Weber Precision Graphics	1-011354	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
Wells Fargo Bank, N.A. Corporate Properties Group	S-601357	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•
West Newport Oil Company	1-061110	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
Wilco-Placentia Oil Operator, LLC	1-521829	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Winonics (Brea)	1-031035	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	X	•	X
Winonics, Inc.	1-021735	433.17(a)	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	X	•	•	•	X	X	•	•	•	•	X	•



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