

2023-24

Annual Report

RESOURCE PROTECTION DIVISION

PRETREATMENT PROGRAM



October 31, 2024

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

Subject: Board Order No. R8-2021-0010, NPDES No. CA0110604
FY 2023/24 Pretreatment Program Annual Report

In accordance with the requirements of NPDES Permit No. CA0110604, attached please find the FY 2023/24 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, 2023 through June 30, 2024.

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

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

- ▶ The program has continued to effectively reduce heavy metals discharges. Since 1976/77, the total mass of heavy metals entering OC San's system has decreased by 90% while the mass of metals discharged to the marine environment has decreased by 99%. The influent heavy metals to OC San's treatment plant meet our NPDES effluent standards before wastewater treatment has occurred.
- ▶ During FY 2023/24, 1,640 inspections of facilities were conducted, and 3,204 samples were collected for analysis. In addition to warning notices and self-monitoring notices, 276 separate enforcement actions were taken against noncompliant significant industrial users in FY 2023/24, including compliance meetings and inspections, and the issuance of fees, penalties, enforcement orders and administrative complaint settlements. Over \$86,735 in noncompliance fees and penalties were issued.
- ▶ During FY 2023/24, 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) 593-7457.



Tom Meregillano
Environmental Protection Manager, Resource Protection Division

JAD:aps

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

Serving:

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



18480 Bandilier Circle
Fountain Valley, CA 92708
714.962.2411
www.ocsan.gov

October 31, 2024

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

Subject: Board Order No. R8-2021-0010, NPDES No. CA0110604
Pretreatment Program Semi-Annual Report for the Period of January 1 through
June 30, 2024

As authorized by NPDES Permit No. CA0110604, the Pretreatment Program Semi-Annual Report information for January 1 through June 30, 2024 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, 2023 through June 30, 2024. Enforcement action and compliance status information has been divided into appropriate six-month summaries.

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

Tom Meregillano
Environmental Protection Manager, Resource Protection Division

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

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

**POTW PRETREATMENT PROGRAM ANNUAL REPORT
CERTIFICATION STATEMENT**

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

Person to contact concerning information contained in this report:

- Name: Tom Meregillano
- Title: Environmental Protection Manager, Resource Protection Division
- Mailing Address: 18480 Bandilier Circle
Fountain Valley, CA 92708-7011
- Telephone: (714) 593-7457

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

October 31, 2024
Date


Tom Meregillano
Environmental Protection Manager, Source Control

Table of Contents

List of Tables	i
List of Figures.....	iii
List of Appendices.....	iii
List of Abbreviations.....	iv
Glossary of Defined Terms	vii
Executive Summary	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 Reclamation Plant No. 2	2-3
2.2.1.3 Joint Works Facilities	2-6
2.3 Compliance with National Pollutant Discharge Elimination System (NPDES) Requirements ...	2-6
2.4 Effluent Characteristics	2-8
2.4.1 General.....	2-8
2.4.2 Suspended Solids	2-8
2.4.3 Carbonaceous Biochemical Oxygen Demand (BOD-C)	2-8
2.4.4 Oil and Grease	2-8
2.4.5 Settleable Solids.....	2-8
2.4.6 Turbidity.....	2-8
2.4.7 pH.....	2-8
2.4.8 Toxicity	2-9
2.5 Facilities Special Projects	2-10
2.5.1 Plant No. 1 Headworks Rehabilitation.....	2-10
2.5.2 Digester Replacement at Plant No. 2.....	2-10
2.5.3 Plant No. 2 Outfall Low Flow Pump Station	2-10
2.6 Metals.....	2-10
2.7 Mass Emission Benchmarks	2-11
2.8 Performance Goals	2-16

2.8.1	Background	2-16
2.8.2	Total Chromium.....	2-16
2.8.3	Total Cyanide	2-17
2.8.4	Chlorinated Phenols	2-18
Chapter 3	. Permits	3-1
3.1	Introduction.....	3-1
3.2	Permit Classifications	3-1
3.3	Permit Issuance.....	3-2
3.3.1	Identification of New Permittees.....	3-2
3.4	Discharge Limits.....	3-3
3.4.1	Industrial.....	3-3
3.4.2	Wastehaulers	3-4
3.5	Establishing Mass Emission Rates (MER).....	3-4
Chapter 4	. Inspection, Sampling, Compliance, & Enforcement.....	4-1
4.1	Introduction.....	4-1
4.2	Routine Inspection and Sampling	4-1
4.3	Non-Routine Sampling and Inspection	4-2
4.3.1	Downstream Sampling	4-2
4.4	Orange County Hazardous Materials Strike Force and Joint Agency Inspections	4-2
4.5	Industrial Compliance Status with Discharge Limits	4-3
4.5.1	Industries in Significant Noncompliance (SNC)	4-3
4.6	Enforcement Activities.....	4-5
4.6.1	Compliance Inspections	4-6
4.6.2	Compliance Meetings.....	4-6
4.6.3	Compliance Requirement Letters.....	4-6
4.6.4	Order to Cease/Terminate Noncompliance/Discharge	4-6
4.6.5	Notices of Violation – Noncompliance Fees and Penalties	4-6
4.6.6	Notices to Inform – Intentional Falsification of Self-Monitoring Reports	4-7
4.6.7	Probation Orders	4-7
4.6.8	Enforcement Compliance Schedule Agreement	4-7
4.6.9	Regulatory Compliance Schedule Agreement (RCSA).....	4-7
4.6.10	Administrative Complaints, Penalties, and Settlement Agreements.....	4-7
4.6.11	Permit Suspensions	4-8
4.6.12	Permit Revocations	4-8
4.6.13	Emergency Suspension Order	4-8
4.6.14	Civil/Criminal Complaints	4-8
4.7	Enforcement Summary	4-8
Chapter 5	. Pretreatment Program Staffing, Costs, and Field Equipment.....	5-1
5.1	Introduction.....	5-1

5.2	Staffing, Revenues, and Costs.....	5-1
5.2.1	Staffing	5-1
5.2.2	Revenues	5-1
5.2.3	Program Costs	5-1
5.3	Field Equipment	5-1
5.3.1	Equipment Inventory	5-1
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	Annual Technical Review of Local Limits.....	6-13
6.11	Significant Changes in Operating the Pretreatment Program.....	6-14
Chapter 7	. Interaction with Other Agencies	7-1
7.1	Introduction.....	7-1
7.2	Los Angeles County Sanitation District Nos. 18 and 19 Flow Accommodation Agreement	7-1
7.3	Irvine Ranch Water District (IRWD)	7-2
7.3.1	IRWD Operating Permit, Regional Board Order R8-2015-0024	7-2
7.3.2	IRWD Analytical Reporting.....	7-2
7.3.3	Inorganic Pollutants.....	7-3
7.3.4	Organic Pollutants	7-6
7.3.5	Discussion of the List of Industrial Users	7-7
7.3.6	Discussion of Industrial User Compliance Status	7-9
7.3.7	Summary of SIU Compliance.....	7-9
7.3.8	Discussion of Significant Changes in the Pretreatment Program	7-9

7.3.9	Pretreatment Program Costs	7-9
7.3.10	Equipment Purchases for FY 2023 – 2024	7-10
7.3.11	Discussion of Public Participation Activities	7-10
7.3.12	Discussion of Biosolids Treatment and Recycling Activities	7-10
7.3.13	IRWD Additional Information	7-11
7.4	Santa Ana Watershed Project Authority (SAWPA)	7-14
7.4.1	Brine Line System Pretreatment Program Overview	7-14
7.4.2	SAWPA, Member Agency, and Contract Agency Pretreatment Programs.....	7-15
7.4.2.1	The City of Beaumont (Beaumont).....	7-15
7.4.2.2	Eastern Municipal Water District (EMWD)	7-15
7.4.2.3	Inland Empire Utilities Agency (IEUA).....	7-16
7.4.2.4	Jurupa Community Services District (JCSD)	7-18
7.4.2.5	San Bernardino Municipal Water Department (SBMWD)	7-18
7.4.2.6	San Bernardino Valley Municipal Water District (Valley District)	7-19
7.4.2.7	Santa Ana Watershed Project Authority (SAWPA)	7-20
7.4.2.8	Western Municipal Water District (Western Water)	7-21
7.4.2.9	Yucaipa Valley Water District (YVWD)	7-22
7.4.3	Self-Monitoring Program	7-23
7.4.4	Field Inspection, Sampling, and Monitoring QA/QC	7-23
7.4.5	Identification of New Permittees.....	7-23
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	7-28
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	7-29
7.4.12	Other Public Participation.....	7-29
7.4.13	Changes to the SAWPA Pretreatment Program	7-31
7.4.14	Pretreatment Program Budget	7-32
7.4.15	Equipment Inventory Listing.....	7-33
7.4.16	SAWPA Pretreatment Program Training	7-34
Chapter 8	Solids Management Program.....	8-1
8.1	Introduction.....	8-1
8.2	Biosolids Quality.....	8-1
Chapter 9	Non-Industrial Source Control and Public Education Programs	9-1
9.1	Introduction.....	9-1
9.2	Fats, Oils, and Grease (FOG) Control Program	9-1
9.2.1	Fats, Oils, and Grease Control.....	9-1

9.3	Radiator Repair Shops	9-4
9.4	Dry Cleaners	9-4
9.5	Dry Weather Urban Runoff Diversions	9-5
9.5.1	Dry Weather Diversion Systems and Urban Runoff Flow	9-6
9.5.2	Proposed Dry Weather Urban Runoff Diversion Systems	9-9
9.5.3	Dry Weather Urban Runoff Quality	9-10
9.5.4	Dry Weather Urban Runoff Diversion Locations	9-11
9.5.5	Dry Weather Urban Runoff Diversion Enforcement Actions	9-11
9.6	Dental Amalgam Source Control Program.....	9-12
9.7	Public Education and Outreach.....	9-13

List of Tables

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2023/242-2

Table 2.2 NPDES Permit Discharge Requirements and OC San’s Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2023/242-7

Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2019/20 – 2023/24.....2-8

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2019/20-2023/242-9

Table 2.5 Final Effluent Yearly Toxicity Results for Fiscal Years 2019/20-2023/242-10

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2019/20-2023/242-11

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2023/242-12

Table 2.8 Parameters with Two or More Consecutive Monthly Exceedances of their Performance Goals2-16

Table 2.9 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Three Consecutive Monthly Exceedances2-17

Table 2.10 Performance Goals - Parameters with Two Consecutive Monthly Exceedances2-17

Table 2.11 Fiscal Year 2022-2023 Monthly Performance Goals for Parameters with Two Consecutive Monthly Exceedances2-18

Table 2.12 Performance Goal Data for Fiscal Year 2023-2024.....2-20

Table 3.1 OC San’s Maximum Allowable Local Discharge Limits3-3

Table 3.2 OC San’s Maximum Allowable Discharge Limits for Wastehaulers Discharging Domestic Septage to OC San Wastehauler Stations3-4

Table 4.1 Summary of Inspections, Sampling and Laboratory Analyses, Fiscal Years 2019/20 – 2023/244-1

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2023/24.....4-4

Table 5.1 Summary of Total Costs and Total Labor for the Pretreatment Program, Fiscal Years 2019/20 – 2023/245-1

Table 5.2 Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2023/245-2

Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2019/20-2023/246-2

Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2023/24.....6-2

Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San’s Disposal Station, FY 2019/20-2023/246-2

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2023/246-4

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2023/246-5

Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2023/246-6

Table 6.7 Permittees with TTO Waivers July 1, 2023 – June 30, 2024.....6-7

Table 6.8 Technical Review of Local Limits6-13

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas7-7

Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2022 – 2023 and 2023 – 20247-9

Table 7.3 Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2023-20247-10

Table 7.4	Summary of SAWPA Special Projects, July 1, 2023 – June 30, 2024	7-27
Table 7.5	Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2023– June 30, 2024	7-28
Table 7.6	Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2023/24.....	7-33
Table 8.1	Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2023/24, in Milligrams per Dry Kilogram	8-1
Table 9.1	Non-Industrial Source Control Programs, FY 2023/24	9-1
Table 9.2	FOG Program Effectiveness, FY 2023/24	9-4
Table 9.3	Dry Weather Urban Runoff Discharges, FY 2016/17 – 2023/24	9-7
Table 9.4	Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2023/24	9-8
Table 9.5	Dry Weather Urban Runoff Diversion Program, FY 2023/24.....	9-9
Table 9.6	Dry Weather Urban Runoff Compliance, FY 2023/24.....	9-10

List of Figures

Figure ES-1-1	Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years	2
Figure 2-1	Map of Orange County Sanitation District's Service Area	2-5
Figure 7-1	MWRP Effluent Total Dissolved Solids (Annual Average).....	7-3
Figure 7-2	MWRP Influent and Effluent Total Heavy Metals and Cyanide	7-4
Figure 7-3	MWRP Influent and Effluent Copper.....	7-5
Figure 7-4	MWRP Influent and Effluent Zinc.....	7-6
Figure 7-5	MWRP Influent and Effluent Organic Pollutants	7-6
Figure 7-6	MWRP Influent Flow	7-11
Figure 7-7	MWRP Influent and Effluent Selenium.....	7-12
Figure 8-1	Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2023/24	8-4
Figure 8-2	Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2023/24.....	8-5
Figure 8-3	Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2023/24	8-5
Figure 8-4	Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2023/24	8-6
Figure 8-5	Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2023/24	8-6
Figure 8-6	Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2023/24	8-7
Figure 8-7	Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2023/24	8-7
Figure 8-8	Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2023/24	8-8
Figure 8-9	Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2023/24	8-8
Figure 8-10	Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2023/24	8-9

List of Appendices

Appendix A.	Monitoring and Compliance Status Report
Appendix B.	Summary of Priority Pollutants and Trace Constituents Analyses
Appendix C.	Priority Pollutants
Appendix D.	Fees/Penalties for Noncompliance
Appendix E.	Public Notice of Industries in Significant Noncompliance
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 Enhanced Primary Treatment	
CGS	Central Power Generation System	
CIP	Clean in Place	
CIU	Categorical Industrial Users	
CNB	City of Newport Beach	
CWA	Clean Water Act	
CWEA	California Water Environment Association	
DAF	Dissolved Air Flotation	
ECSA	Enforcement Compliance Schedule Agreements	
EMWD	Eastern Municipal Water District	
EPA	Environmental Protection Agency	
EQ	exceptional quality	
ERP	Enforcement Response Plan	
FOG	fats, oils, and grease	
FSEs	Food Service Establishments	
FTE	full time equivalent	
FTU	fixed treatment unit	
FVM	fluvoxamine	
FY	fiscal year	
GAP	Green Acres Project	
GI	grease interceptors	
GIS	geographic information system	
GWRS	Groundwater Replenishment System	
HC	hydrocarbon	
ICP	Inductively Coupled Plasma	
IEUA	Inland Empire Utilities Agency	
IPA	isopropyl alcohol	
IRWD	Irvine Ranch Water District	
IU	Industrial User	
IUS	Industrial User Survey	
IX	Ion Exchange	
JCSD	Jurupa Community Services District	
JPA	Joint Powers Authority	

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

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

Glossary of Defined Terms

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

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

Term	Definition	Citation
Technical Evaluation of Local Limits	The technical evaluation of local limits is a study which develops enforceable local requirements to address Federal standards as well as State and local regulations including, but not limited to, passthrough and interference. The study takes into account influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
Technical Review of Local Limits	The technical review of local limits is a study which reviews changes that impact existing enforceable local requirements to address federal standards as well as state and local regulations including, but not limited to, Pass Through and Interference. The review takes into account impacts of influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy since the last technical evaluation and may predicate a local limits update.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
Total Toxic Organics	The summation of all quantifiable values greater than 0.01 milligrams per liter for the organics regulated by the EPA or OCSD for a specific industrial category.	Ordinance, Section 102.A.94
User	Any Person who discharges or causes a discharge of Wastewater directly or indirectly to a public sewer. User shall mean the same as Discharger. User includes Industrial Users as a type of User.	Ordinance, Section 102.A.96
Wastehauler	Any Person carrying on or engaging in vehicular transport of brine, domestic septage (except the SAWPA Sewer Service Area in compliance with the 1996 OCSD/SAWPA Agreement), or Wastewater as part of, or incidental to, any business for the purpose of discharging directly or indirectly said Wastewater into OCSD's Sewerage System.	Ordinance, Section 102.A.98
Zero Discharge Certification	A control mechanism that is issued by OCSD to ensure that specific facilities are not discharging a Pollutant(s) that may otherwise qualify the facility for a discharge permit.	Ordinance, Section 102.A.103

Executive Summary

E.1 Background

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

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

E.2 Introduction

The fiscal year (FY) 2023/24 OC San Annual Report provides the following:

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

E.2.1 Pretreatment Program Summary

Control of Pollutants

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

96%, and zinc by 96% from historical levels. Long-term trends of heavy metals in the effluent show a steady decline since FY 1977 (see Figure ES-1-1).

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

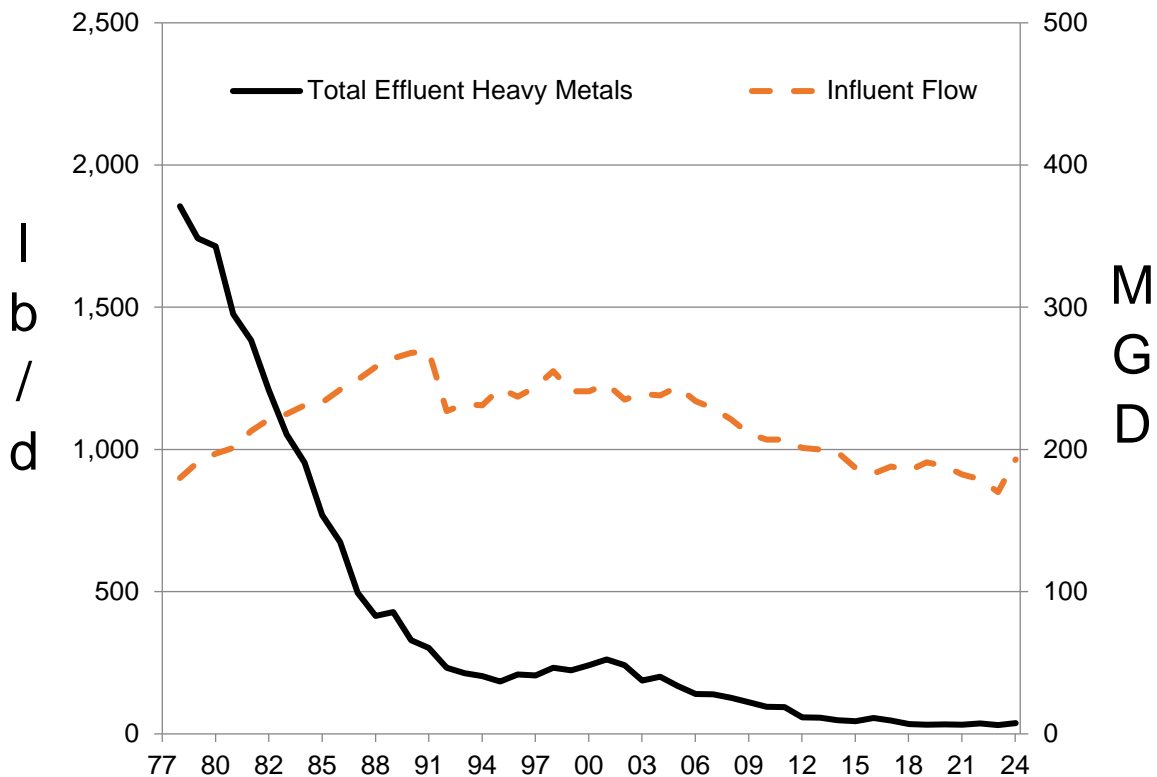


Figure ES-1-1 Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years
Orange County Sanitation District

Permits

During FY 2023/24 OC San managed 542 active permits, of which there were 333 Class I permits, 15 Class II permits, 49 Wastehauler permits, 47 Special Purpose Discharge Permits, 21 Dry Weather Urban Runoff Diversion permits, 38 FOG (fats, oils, and grease) permits, and 39 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 333 Class I users, 204 were subject to Federal Categorical Pretreatment Standards.

Program Costs

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and collection of user charges. The pretreatment program operating expenditures for the fiscal year, including laboratory analyses, totaled \$7,644,669. A total revenue of \$21,743,178.54 in sewer use charge payments was

received and over \$86,735.00 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 1,640 industrial inspections during the fiscal year, with the collection of 3,204 samples. 46 compliance inspections and five compliance meetings were held with significant industrial users (SIUs) to identify and assess noncompliance problems and propose long-term solutions. OC San conducted two covert downstream monitoring events. 37 SIU permittees of the 333 (11.1%) that were active in FY 2023/24 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 2023/24.

E.2.2 Pretreatment Program Elements

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

Public Participation

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

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

Wastehauler Program

During FY 2023/24, 45 wastehaulers were under permit with OC San and a total of 152 trucks were used to deliver the loads to OC San. During the past fiscal year, 7.8 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 2023/24 OC San granted 109 companies TTO waivers.

Industrial Operations and Maintenance Improvement Program

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

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

practices. Those that attended the classes, passed the exam and quizzes, and successfully fulfilled the audit requirements, received certificates of completion. This program was on hold during the COVID-19 pandemic and is under consideration to resume in the coming years.

Non-Industrial Source Control Program

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

E.2.3 Compliance with NPDES Discharge Requirements

There were no plant upsets, Interference, or Pass Through incidents attributable to industrial users in FY 2023/24.

Chapter 1. NPDES Requirements – Pretreatment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attachment H - Pretreatment

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

I. General Pretreatment Requirements

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

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

See response above.

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

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

The ongoing quarterly inspection, sampling, and monitoring program for each Class I permittee (Significant Industrial User, or SIU) ensures compliance with federal, state, and local regulations. The compliance status of all permittees subject to federal categorical standards are shown in the Fiscal Year 2023/24 List of SIUs with Monitoring and Compliance Status, presented in Appendix A of this report.

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

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

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

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

The requirements to enforce and implement National Pretreatment Standards for general prohibitions and specific industrial subcategories are contained in OC San's Ordinance. Chapter 4 of this report describes OC San's enforcement efforts for FY 2023/24.

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

The required functions include the identification, quantification, permitting, and enforcement of the standards set forth in OC San's Ordinance. Chapter 3 and Chapter 4 of this report describe the permitting and enforcement efforts for FY 2023/24.

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

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and sewer use charges. The pretreatment program's operating expenditures for FY 2023/24, including laboratory analyses, totaled \$7,644,669. Chapter 5 of this report provides additional details.

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

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

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

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

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

There were no plant upsets, Interference, or Pass Through incidents attributable to industrial users in FY 2023/24.

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

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

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

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

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

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

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

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

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

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

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

For FY 2023/24, the operating expenses for the pretreatment program totaled \$7,644,669. Additional information on pretreatment program costs and purchases are shown in Chapter 5 of this report.

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

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

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

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

Chapter 2. OC San Facilities and Compliance with Discharge Requirements

2.1 Introduction

OC San is responsible for collecting, transporting, and treating wastewater, as well as reusing or disposing of treated wastewater and the separated solids in accordance with all applicable federal, state, and local laws and regulations. The following pages represent a summary of the operation of the wastewater treatment and collection facilities, historical data, and the regulatory compliance record for the period of July 1, 2023 through June 30, 2024 (FY 2023/24). OC San is also enrolled in the statewide Waste Discharge Requirements program for sanitary sewers.

OC San operates and maintains Reclamation Plant Nos. 1 and 2, 389 miles of sewers, and 15 outlying pump stations. The treatment plants and pump stations are supervised, operated, and maintained by highly trained professionals with appropriate certifications from the California State Water Resources Control Board for treatment plant operators, and voluntary certifications from the California Water Environment Association.

The treated wastewater is either discharged into the Pacific Ocean in strict and consistent compliance with state and federal requirements as set forth in the Permit, or directed to the Orange County Water District (OCWD) for reclamation. Approximately 129 million gallons per day (MGD) of treated wastewater was routed to facilities operated by OCWD during FY 2023/24. The Groundwater Replenishment System (GWRS) produces purified recycled water used to recharge the Orange County Groundwater Basin and protect it from degradation due to seawater intrusion. As of June 2024, GWRS produced 85 MGD of reclaimed water.

During FY 2023/24, OC San beneficially recycled 100% of the dewatered biosolids for use as agricultural soil amendments and compost products. Biosolids production for FY 2023/24 was approximately 187,156 wet tons, a 2% reduction from 191,351 wet tons in FY 2022/23. Biosolids production including digester cleanings was approximately 191,557 wet tons in FY 2023/24, a 0.4% reduction from 192,280 wet tons in FY 2022/23. Solids content was 25% for Plant No. 1 and 28% for Plant No. 2. Two management options (land application and composting) were utilized through five vendor contracts in two states and three counties. Grit and screenings are transported under contract for landfill disposal. Debris and grit removed from the sewer during cleaning is dried at Plant No. 1 and then hauled to landfill for disposal.

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

2.2 Existing OC San Facilities

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

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2023/24 Orange County Sanitation District					
FY	Influent (MGD)	Effluent (MGD)	FY	Influent (MGD)	Effluent (MGD)
1997	244	242	2011 ^a	207	152
1998	255 ^c	255	2012	201	139
1999	241	239	2013 ^a	200	137
2000	241	236	2014 ^a	198	137
2001	246	244	2015 ^{a,e}	187	117
2002	235	231	2016 ^{a,e}	183	92
2003	239	235	2017 ^{a,c}	188	101
2004	238	238	2018 ^{a,c}	185	88
2005	244	247 ^b	2019 ^c	191	104
2006	234	235	2020 ^a	188	101
2007	229	232 ^b	2021 ^a	182	91
2008	221 ^a	212 ^d	2022 ^a	179	94
2009	211 ^a	167	2023 ^{a,c}	186	102
2010	207 ^c	152	2024 ^{c,f}	193	101

- a. Decreases due to drought; less infiltration due to drier soils and business recession.
- b. There was more effluent than influent due to in-plant construction and dewatering that was discharged downstream of influent metering.
- c. El Niño (wet year).
- d. Beginning in 2008, more influent than effluent due to Groundwater Replenishment System.
- e. GWRS Initial Expansion came online, so even less effluent was discharged as more water was reclaimed.
- f. GWRS Final Expansion came online in December 2023; however, issues that prevent the full extent of water reclamation occur, so no major impact to the effluent is seen yet.

2.2.1 Description of Treatment Plants

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

2.2.1.1 Reclamation Plant No. 1

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

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

For improved performance, OC San conducts chemically enhanced primary treatment (CEPT). Ferric chloride and anionic polymer are added to the primary clarifiers to enhance settling of the organic solids.

Each primary clarifier is covered to capture foul air for treatment in scrubbers. Plant No. 1 has a primary treatment capacity of 204 MGD.

During FY 2023/24, 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 129 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 61% methane and 38% carbon dioxide. This fuel has a heating value of about 619 British thermal units per cubic foot (BTU/cu. ft.). The primary and secondary sludge is blended and thickened in the thickening centrifuge units prior to digestion. Digester gas is collected, compressed, cleaned, and distributed to the Central Power Generation System (CGS) at each plant as a renewable fuel for energy generation.

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

2.2.1.2 Reclamation Plant No. 2

Reclamation Plant No. 2 is located in the City of Huntington Beach near the mouth of the Santa Ana River. Five trunk sewers transport wastewater into Headworks D facility, which contains pH, conductivity, and flow meters, along with six mechanically-cleaned bar screens, seven main sewage pumps, and six grit tanks. All screenings and grit are hauled by a private contractor to a landfill for disposal. The foul air from the headworks, grit tanks, and primary sedimentation basins is collected for treatment in a combination of chemical scrubbers and bio-towers. Influent to Plant No. 2 is split into reclaimable and non-reclaimable flows. Reclaimable flows receive secondary treatment and then are directed to OCWD's GWRS. Non-reclaimable flows receive secondary treatment, are combined with other Plant No. 1 wastestreams, and are discharged to the ocean outfall.

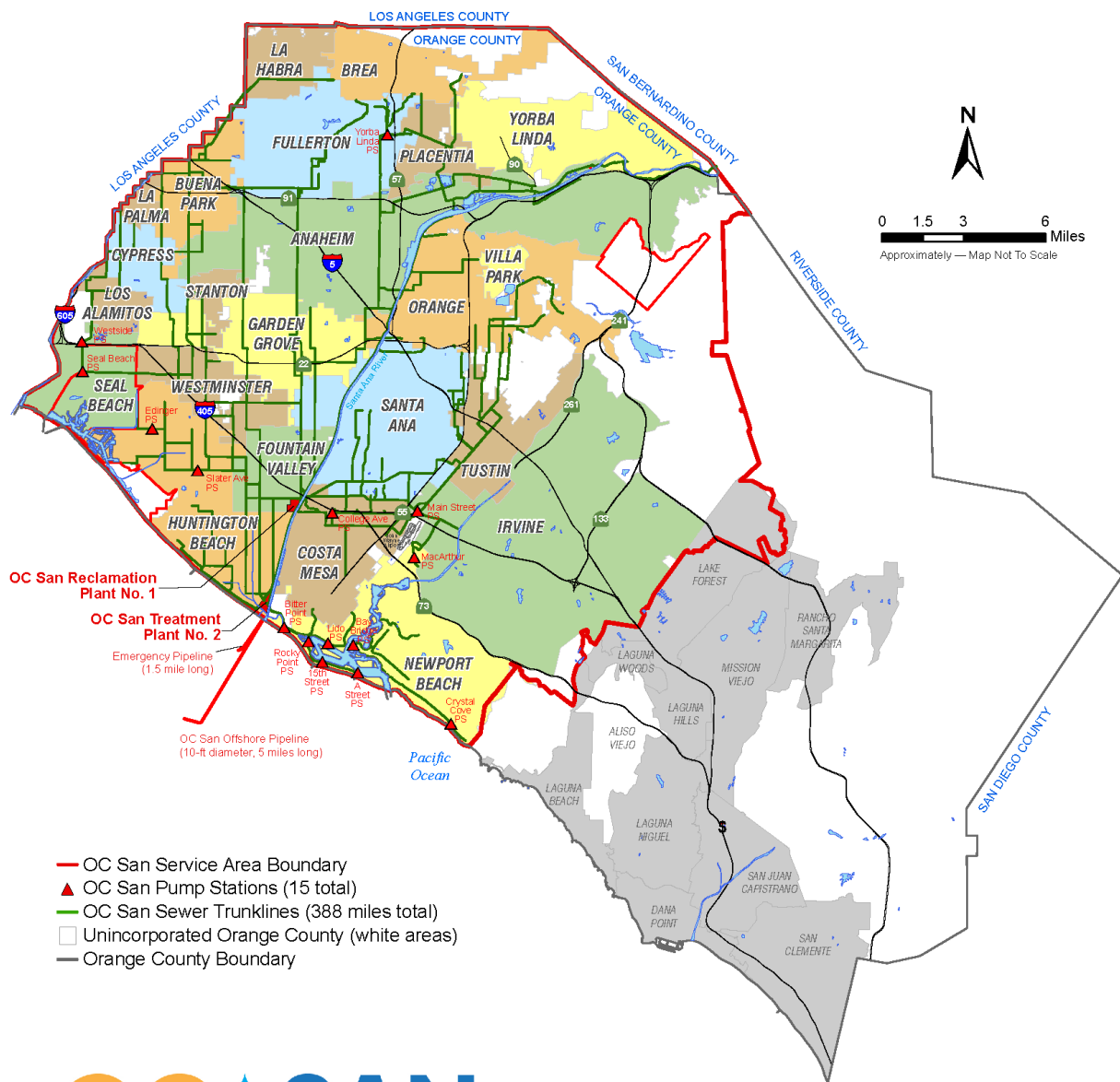
Ferric chloride and anionic polymer are used to enhance the settling of solids during primary treatment. Settleable and suspended solids, and floatable particulates are removed from the wastewater in primary sedimentation basins and pumped to anaerobic digesters for stabilization. Plant No. 2 primary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

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

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

SCE and is imported during periods of high demand. The internal combustion engines are fueled primarily with digester gas with a small amount (approximately 5-10%) of natural gas.

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



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

Figure 2-1 Map of Orange County Sanitation District's Service Area
Orange County Sanitation District

2.2.1.3 Joint Works Facilities

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

Treated secondary effluent from Plants Nos. 1 and 2 is pumped to OC San's main discharge point, the 120-inch diameter, 5-mile long ocean outfall (the last mile of which is a diffuser with 503 ports that provides a minimum dilution of 181:1). During FY 2023/24 all influent received secondary treatment.

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

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

Table 2.2 NPDES Permit Discharge Requirements and OC San's Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2023/24
Orange County Sanitation District

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	Instantaneous Maximum		
Flow (MGD)	193	--	--	--	101	NA
BOD-C (mg/L)	214 ^E	25	40	--	7.9	Yes
BOD-C (lb/d)	--	42,951	68,722	--	6,221	Yes
BOD-C (percent removal)	--	>85 ^B	--	--	98.0	Yes
Suspended solids (mg/L)	283 ^E	30	45	--	6.4	Yes
Suspended solids (lb/d)	--	51,541	77,312	--	5,526	Yes
TSS (percent removal)	--	>85 ^B	--	--	98.6	Yes
Grease and oil (mg/L)	--	25	40	75	0.5	Yes
Grease and oil (lb/d)	--	42,951	68,722	128,853	493	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	3.2	Yes
pH	7.6 (P1), 7.7 (P2)	6.0 to 9.0	6.0 to 9.0	9.0	7.5	Yes
Total Chlorine Residual (mg/L)	--	0.36 ^C	--	10.86; D _{max} = 1.45	0.09 ^C	Yes
Total Chlorine Residual (lb/d)	--	618 ^C	--	18,658; D _{max} = 2,491	54 ^C	Yes
Benzidine (µg/L)	ND	0.0125	--	--	ND	Yes
Benzidine (lb/d)	--	0.0215	--	--	--	Yes
Hexachlorobenzene (µg/L)	ND	0.0380	--	--	ND	Yes
Hexachlorobenzene (lb/d)	--	0.0653	--	--	--	Yes
PCBs (µg/L)	ND	0.0034	--	--	ND	Yes
PCBs (lb/d)	--	0.0058	--	--	--	Yes
TCDD equivalents (pg/L)	NR	0.7059	--	--	ND	Yes
TCDD equivalents (lb/d) ^D	--	0.0000012	--	--	--	Yes
Toxaphene (µg/L)	NR	0.0380	--	--	ND	Yes
Toxaphene (lb/d)	--	0.0653	--	--	--	Yes

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

-- Not determined

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

B Monthly average minimum

C 6-month median

D lb/d = pounds per day

E Weighted average based on respective influent flow quantities

ND Not detected

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

NA Not applicable

2.4 Effluent Characteristics

2.4.1 General

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

2.4.2 Suspended Solids

During FY 2023/24, the suspended solids discharge was in compliance with Permit effluent limits. The final effluent monthly average suspended solids concentration of 6.4 milligrams per liter (mg/L) for a monthly average discharge mass emissions rate of 5,526 pounds per day (lb/d) during FY 2023/24 is 21% of the allowable 30-day average concentration limit of 30 mg/L, and 11% of the mass emissions limit of 51,541 lb/d. A summary of the suspended solids data for the past five years is shown in Table 2.3.

2.4.3 Carbonaceous Biochemical Oxygen Demand (BOD-C)

The current 30-day average discharge permit limit for carbonaceous BOD is 25 mg/L. The discharge was in compliance for FY 2023/24. The final effluent 30-day average for FY 2023/24 was 7.9 mg/L with a removal rate of 98%. 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 2019/20 – 2023/24 Orange County Sanitation District								
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
2019/20	327	512,700	5.3	4,583	209	327,700	5.4	4,435
2020/21	315	478,130	5.4	4,116	211	320,270	6.4	4,858
2021/22	332	503,930	5.8	4,566	205	311,160	9.3	6,778
2022/23	290	450,151	6.6	5,618	231	358,568	9.7	8,257
2023/24	283	455,320	6.4	5,526	214	343,255	7.9	6,221

2.4.4 Oil and Grease

The 30-day effluent limit for oil and grease is 25 mg/L and 42,951 lb/d. Average oil and grease was measured at 0.5 mg/L in the treated effluent during this fiscal year.

2.4.5 Settleable Solids

The 30-day average limit for settleable solids is 1.0 milliliter per liter (mL/L) with a maximum at any time of 3.0 mL/L. The FY 2023/24 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 2023/24 average turbidity was 3.2 NTU. A summary of the turbidity data for the past five years is shown in Table 2.4.

2.4.7 pH

Pursuant to the Permit, the pH of the ocean discharge shall neither exceed 9.0 nor be less than 6.0. The final effluent was in compliance throughout FY 2023/24. The annual average pH was 7.5, which is well

within the pH effluent limits. The ocean discharge pH has remained relatively constant over the past five years, as summarized in Table 2.4.

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2019/20-2023/24 Orange County Sanitation District			
FY	Settleable Solids (mL/L)	Turbidity (NTU)	pH
2019/20	ND	2.4	8.1
2020/21	ND	3.0	8.1
2021/22	ND	2.6	7.5
2022/23	ND	3.4	7.5
2023/24	ND	3.2	7.5

2.4.8 Toxicity

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

Every calendar year the final effluent must be tested using each of the species listed in the NPDES permit to determine which species is most sensitive to the final effluent. The most sensitive test species is then used as the test organism for monthly and quarterly testing. In August 2023, acute toxicity tests were performed with Topsmelt (*Atherinops affinis*) and the mysid crustacean (*Americamysis bahia*) to determine the most sensitive acute test species. There were no observed effects for both species. As such, all FY 2023/24 quarterly tests continued to be performed with *Atherinops affinis* as the most sensitive test species.

In September 2023, chronic toxicity tests were performed with giant kelp (*Macrocystis pyrifera*), purple sea urchin (*Strongylocentrotus purpuratus*), and Topsmelt (*Atherinops affinis*) to determine the most sensitive chronic test species. The results demonstrated that *Atherinops affinis* was the most sensitive species for the chronic test. FY 2023/24 monthly chronic testing was conducted using *M. pyrifera* from July 2023 to October 2023 and *Atherinops affinis* from November 2023 to June 2024.

Table 2.5 summarizes the toxicity testing results for FY 2019/20 through FY 2023/24. All four acute toxicity tests and 11 of 12 chronic toxicity tests for FY 2023/24 passed the TST, indicating no observable final effluent toxicity overall.

Table 2.5 Final Effluent Yearly Toxicity Results for Fiscal Years 2019/20-2023/24 Orange County Sanitation District		
FY	Test Species	Summary of Toxicity Results
2019/20	Acute (<i>Atherinops affinis</i>)	Pass
	Chronic (<i>Strongylocentrotus purpuratus</i>)	Pass
2020/21	Acute (<i>Atherinops affinis</i>)	Pass
	Chronic (<i>Strongylocentrotus purpuratus</i>)	Pass
2021/22	Acute (<i>Atherinops affinis</i>)	Pass
	Chronic (<i>Strongylocentrotus purpuratus</i>)	Pass
2022/23 ⁽¹⁾	Acute (<i>Atherinops affinis</i>)	Pass
	Chronic (<i>Strongylocentrotus purpuratus</i> & <i>Macrocystis pyrifera</i>)	Pass
2023/24 ⁽²⁾	Acute (<i>Atherinops affinis</i>)	Pass
	Chronic (<i>Macrocystis pyrifera</i> & <i>Atherinops affinis</i>)	Pass

⁽¹⁾ FY 2022/23 monthly chronic testing was conducted using *Strongylocentrotus purpuratus* from July 2022 to October 2022 and *Macrocystis pyrifera* from November 2022 to June 2023.

⁽²⁾ FY 2023/24 monthly chronic testing was conducted using *Macrocystis pyrifera* from July 2023 to October 2023 and *Atherinops affinis* from November 2023 to June 2024. There was no reportable data in March 2024 as at least one of the four test acceptability criteria were not met in two in-house (OC San) and one external (Enthalpy Analytical) reference toxicant tests.

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 Digester Replacement at Plant No. 2

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

2.5.3 Plant No. 2 Outfall Low Flow Pump Station

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

2.6 Metals

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

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

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2019/20-2023/24 Orange County Sanitation District											
Constituent	INFLUENT					EFFLUENT					
	19-20	20-21	21-22	22-23	23-24	19-20	20-21	21-22	22-23	23-24	
Cadmium	1	0.6	0.6	0.7	0.7	0.02	ND	ND	0.3	0.08	
Chromium	11	10	9	7.4	9.7	0.9	1	1.4	0.8	1.14	
Copper	149	120	105	108	100	4	4	5.3	4.1	3.5	
Lead	4	4	3.2	2.9	3.2	0.4	0.4	0.4	0.1	0.11	
Nickel	15	16	12.8	10.7	12.2	7	7	8	6	7.5	
Silver	1	1	1	1	1	ND	ND	ND	ND	0.004	
Zinc	248	221	215	199	218	21	21	22	20	25.6	
Total Avg	429	372	346	330	345	33	32	37	31	38	
ND	Non-detect										
2019-20	Influent mass based on 188 MGD					2019-20	Effluent mass based on 101 MGD				
2020-21	Influent mass based on 182 MGD					2020-21	Effluent mass based on 91 MGD				
2021-22	Influent mass based on 179 MGD					2021-22	Effluent mass based on 94 MGD				
2022-23	Influent mass based on 186 MGD					2022-23	Effluent mass based on 102 MGD				
2023-24	Influent mass based on 193 MGD					2023-24	Effluent mass based on 101 MGD				

2.7 Mass Emission Benchmarks

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

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

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

As shown in Table 2.7, most of the organic compounds with benchmarks were rarely detected in the effluent. More than half of the 81 constituents were not detected in OC San’s effluent and are listed as zero (0) metric tons per year emitted, and zero percent of the benchmark. Only 14 of 81 constituents exceeded 10% of their respective benchmarks. It’s worth noting that, historically, these constituents were rarely detected in OC San’s effluent, so the benchmarks could only be based on the MDL. As OC San continues to increase the sensitivity of its detection limits, some constituents may be more discernable in the future. That is, as detection limits are lowered, there will likely be fewer zero-tons-emitted constituents in OC San’s list of benchmarks.

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2023/24
Orange County Sanitation District

Constituent	2023-24 12-Mo. Avg Benchmark	2023-24 12-Mo. Avg Actual	2023-24 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detecte d	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Marine Aquatic Life Toxicants									
Arsenic, total recoverable	1.88	0.45	23.94	0.337781	0.79139	15	15	110.82	3.25
Cadmium, total recoverable	0.07	0.012	17.14	0.000000	0.038829	14	10	110.43	0.09
Chromium (VI)	0.44	0.172	39.09	0.113557	0.301763	14	14	110.43	1.26
Copper, total recoverable	5.21	0.629	12.07	0.35146	1.571686	14	14	110.43	4.11
Lead, total recoverable	0.18	0.017	9.44	0.000000	0.108892	14	6	110.43	0.13
Mercury, total recoverable	0.002	0.001	50	0.000268	0.001035	12	12	110.31	0.0036
Nickel, total recoverable	6.69	1.148	17.16	0.862806	1.752892	14	14	110.43	8.55
Selenium, total recoverable	6.23	1.542	24.75	1.271586	3.039825	14	14	110.43	11.15
Silver, total recoverable	0.05	0	0	0.000000	0.002058	14	3	110.43	0
Zinc, total recoverable	13.09	4.169	31.85	2.822264	9.615021	14	14	110.43	29.08
Cyanide, total recoverable	1.67	0.431	25.81	0.000000	0.666307	13	11	110.47	3.65
Ammonia as nitrogen	10457.00	3563.517	34.08	2259.2966	6087.734248	365	365	101.03	26698.82
Total chlorine residual	38.09	10.597	27.82	8.034485	16.880693	1098	1000	101.05	80.87
Non-chlorinated phenols	0.44	0	0	0.000000	0	12	0	122.42	0
Chlorinated phenols	0.15	0.005	3.33	0.000000	0.059268	12	1	122.42	0.03
Endosulfan	0.003	0	0	0.000000	0	2	0	105.54	0
Endrin	0.006	0	0	0.000000	0	2	0	105.54	0
Hexachlorocyclohexane (HCH)	0.003	0	0	0.000000	0	2	0	105.54	0
Radioactivity	-	-	-	-	-	-	-	-	-

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2023/24
Orange County Sanitation District

Constituent	2023-24 12-Mo. Avg Benchmark	2023-24 12-Mo. Avg Actual	2023-24 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detecte d	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Human Health Toxicants – Non-Carcinogens									
Acrolein	3.03	0	0	0.000000	0.000000	4	0	89.77	0
Antimony	0.72	0.185	25.69	0.12642	0.322103	14	14	110.43	1.37
Bis(2-chloroethoxy) methane	3.03	0	0	0.000000	0.000000	12	0	117.52	0
Bis(2-chloroiso-propyl) ether	1.21	0	0	0.000000	0.000000	12	0	117.52	0
Chlorobenzene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Chromium (III)	-	-	-	-	-	-	-	-	-
Di-n-butyl-phthalate	0.51	0	0	0.000000	0.000000	12	0	117.52	0
Dichlorobenzenes	0.61	0	0	0.000000	0.000000	4	0	89.77	0
Diethyl phthalate	0.22	0.012	5.45	0.000000	0.081096	12	2	117.52	0.1
Dimethyl phthalate	1.21	0	0	0.000000	0.000000	12	0	117.52	0
4,6-dinitro-2-methylphenol	3.03	0	0	0.000000	0.000000	12	0	122.42	0
2,4-dinitrophenol	3.03	0	0	0.000000	0.000000	12	0	122.42	0
Ethylbenzene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Fluoranthene	0.61	0	0	0.000000	0.000000	12	0	117.52	0
Hexachlorocyclopentadiene	3.03	0	0	0.000000	0.000000	12	0	117.52	0
Nitrobenzene	0.11	0	0	0.000000	0.000000	12	0	117.52	0
Thallium	0.06	0.004	6.67	0.000000	0.046835	14	4	110.43	0.04
Toluene	0.05	0	0	0.000000	0.000000	4	0	89.77	0
Tributyltin	0.07	0	0	0.000000	0.000000	4	0	92.64	0
1,1,1-trichloroethane	1.21	0	0	0.000000	0.000000	4	0	89.77	0

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2023/24
Orange County Sanitation District

Constituent	2023-24 12-Mo. Avg Benchmark	2023-24 12-Mo. Avg Actual	2023-24 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detecte d	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Human Health Toxicants – Carcinogens									
Acrylonitrile	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Aldrin	0.001	0	0	0.000000	0.000000	2	0	105.54	0
Benzene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Benzidine	0.004	0	0	0.000000	0.000000	12	0	117.52	0
Beryllium	0.3	0.003	1	0.000000	0.03444	14	4	110.43	0.03
Bis(2-chloroethyl) ether	0.61	0	0	0.000000	0.000000	12	0	117.52	0
Bis(2-ethylhexyl) phthalate	1.11	0.019	1.71	0.000000	0.113767	12	2	117.52	0.1
Carbon tetrachloride	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Chlordane	0.001	0	0	0.000000	0.000000	2	0	105.54	0
Chlorodibromomethane	1.21	0.108	8.93	0.000000	0.272548	4	3	89.77	1.04
Chloroform	4.72	0.72	15.25	0.503184	1.242653	4	4	89.77	6.39
DDT	0.003	0	0	0.000000	0.000914	2	1	105.54	0
1,4-dichlorobenzene	0.12	0	0	0.000000	0.000000	4	0	89.77	0
3,3'-dichlorobenzidine	0.42	0	0	0.000000	0.000000	12	0	117.52	0
1,2-dichloroethane	1.21	0	0	0.000000	0.000000	4	0	89.77	0
1,1-dichloroethylene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Dichlorobromomethane	2.56	0.227	8.87	0.000000	0.473043	4	3	89.77	2.18
Dichloromethane	1.21	0.049	4.05	0.000000	0.197232	4	1	89.77	0.49
1,3-dichloropropene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Dieldrin	0.002	0	0	0.000000	0.000000	2	0	105.54	0
2,4-dinitrotoluene	3.03	0	0	0.000000	0.000000	12	0	117.52	0
1,2-diphenylhydrazine	0.61	0	0	0.000000	0.000000	12	0	117.52	0
Halomethanes	0.12	0.034	28.33	0.000000	0.090412	5	4	88.73	0.34
Heptachlor	0.003	0	0	0.000000	0.000000	2	0	105.54	0
Heptachlor epoxide	0.003	0	0	0.000000	0.000000	2	0	105.54	0
Hexachlorobenzene	0.01	0	0	0.000000	0.000000	12	0	117.52	0
Hexachlorobutadiene	0.61	0	0	0.000000	0.000000	12	0	117.52	0
Hexachloroethane	0.61	0	0	0.000000	0.000000	12	0	117.52	0
Isophorone	0.61	0	0	0.000000	0.000000	12	0	117.52	0
N-nitrosodimethylamine	3.03	0	0	0.000000	0.000000	12	0	117.52	0
N-nitrosodi-n-propylamine	3.03	0	0	0.000000	0.000000	12	0	117.52	0
N-nitrosodiphenylamine	0.61	0	0	0.000000	0.000000	12	0	117.52	0
PAHs	0.45	0	0	0.000000	0.000000	12	0	117.52	0
PCBs	0.001	0	0	0.000000	0.000000	2	0	105.54	0
TCDD equivalents	0.000000201	0.000000018386	9.15	0.000000	0.073545	4	1	92.64	0.000000144
1,1,2,2-tetrachloroethane	1.21	0	0	0.000000	0.000000	4	0	89.77	0
Tetrachloroethylene	0.45	0	0	0.000000	0.000000	4	0	89.77	0

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2023/24
Orange County Sanitation District

Constituent	2023-24 12-Mo. Avg Benchmark	2023-24 12-Mo. Avg Actual	2023-24 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detecte d	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Toxaphene	0.01	0	0	0.000000	0.000000	2	0	105.54	0
Trichloroethylene	1.21	0	0	0.000000	0.000000	4	0	89.77	0
1,1,2-trichloroethane	1.21	0	0	0.000000	0.000000	4	0	89.77	0
2,4,6-trichlorophenol	0.15	0.005	3.33	0.000000	0.05869	12	1	122.42	0.03
Vinyl chloride	1.21	0	0	0.000000	0.000000	4	0	89.77	0

^A Metric Tons

2.8 Performance Goals

2.8.1 Background

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

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

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

Table 2.8 Parameters with Two or More Consecutive Monthly Exceedances of their Performance Goals		
Orange County Sanitation District, Resource Protection Division		
Parameter	Fiscal Year	Status of Investigation
Total Chromium	2021-2022	Report approved by SARWQCB and EPA
Total Cyanide	2021-2022	Investigation in progress
Chlorinated Phenols	2022-2023	Investigation completed
Total Chromium	2023-2024	Investigation completed

2.8.2 Total Chromium

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

Table 2.9 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Three Consecutive Monthly Exceedances Orange County Sanitation District, Resource Protection Division							
Parameter	Performance Goal	First Exceedance		Second Exceedance		Third Exceedance	
Total Chromium	1.55 µg/L	September 2021	3.76 µg/L	October 2021	4.29 µg/L	November 2021	2.68 µg/L
		November 2023	1.93 µg/L	December 2023	1.64 µg/L	--	

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

Based on the approval from EPA and SARWQCB, in May 2022 OC San initiated a year-long special project to determine whether its effluent total chromium concentrations are originating from Cr(VI) and/or Cr(III) by analyzing for each individual species in the monthly final effluent sample. After the year-long investigation, it was determined that the measured total chromium each month was entirely attributed to Cr(III). OC San provided the final speciation results to SARWQCB and EPA during the May 9, 2023 NPDES Regulatory Semi-Annual Management Meeting.

In November of 2023, chromium was detected in the final effluent at a concentration of 1.93 ug/L, exceeding the performance goal of 1.55 ug/L. In December 2023, two final effluent samples were analyzed for total chromium. The monthly average result between these two samples was 1.64 ug/L, which also exceeded the performance goal. As a result of the two consecutive exceedances of the performance goal, OC San underwent an internal investigation into the cause of the exceedance. In both November and December, samples of final effluent were sent to an outside laboratory for speciation of hexavalent and trivalent chromium. Results indicated that the total chromium signal within OC San’s final effluent arises entirely from Cr(III), and no Cr(VI) was detected in either sample sent for analysis. This is consistent with the results of the year-long special study conducted between 2022 and 2023 that was approved by the SARWQCB and EPA to better understand the nature of chromium species within our effluent. OC San is continuing efforts to identify any specific source of chromium which might be contributing to the noted performance goal exceedances.

2.8.3 Total Cyanide

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

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

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

Sodium hydroxide (NaOH) is used to preserve effluent samples for cyanide analysis. It was determined that GWRS’s ROC contains chloramine, which can react with sample matrices in the presence of NaOH to create cyanide signals. This phenomenon was reported in literature and by other wastewater agencies who

later obtained regulatory approval to modify their sample preservation processes to reduce the potential matrix interferences.

To further evaluate this phenomena, OC San conducted a lab experiment, which showed that the effluent and ROC samples (analyzed without NaOH preservation or after dechlorination) yielded much lower (up to 10-fold) Total Cyanide results compared to samples that were preserved with NaOH. Although the lab experimental findings further supported that NaOH preservation of chlorinated wastewater creates Total Cyanide signals, data seems to suggest this matrix interference is sporadic, as there has not been any additional performance goal exceedances since October 2021. This sporadic occurrence could be due to 1) chloramine forming during chlorination at the beginning of the treatment train and/or 2) potentially varying degrees of decreases in chloramine concentrations along the treatment train resulting in variable concentrations of chloramine in ROC. Notably, ROC is currently a minor contributing stream (i.e., approximately 18 percent) to OC San’s final effluent. However, it is possible that the matrix interferences will be intensified once ROC becomes a larger contributor to OC San’s final effluent upon completion of GWRS Final Expansion. As such, OC San is currently considering two options to reduce matrix interferences: 1) eliminating the sample preservation step and 2) exploring a different cyanide method that is more robust in mitigating interference. OC San may proceed with one or both options depending on laboratory staffing level and/or availability of new instrument to support a different cyanide method. In addition, OC San has been implementing a ROC characterization study since October 2022 to determine the potential severity of the matrix interference with cyanide and BOD testing and gathering baseline data to proactively conduct investigation for potential performance goal exceedances after the GWRS Final Expansion. The study will be completed after one year. Thus far, OC San has not observed any increasing trends of chlorine in the RO with the exception of some sporadic spikes. However, there were not any performance goal exceedances during FY 2023/24.

2.8.4 Chlorinated Phenols

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

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

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

In addition, OC San reviewed how the Chlorinated Phenols results were being calculated. OC San’s NPDES permit states that, when calculating the sum of several constituents, values characterized as ND or DNQ should be considered as having a concentration of zero. Because the values for 2,4,6-

trichlorophenol and 2-chlorophenol reported in January and February 2023 were reported as DNQ and ND, respectively, those values should not have been included in the total chlorinated phenols calculation. When performing the calculation in accordance with the instructions in the permit, the only quantifiable data would have been pentachlorophenol at a concentration of 0.74 µg/L and 0.82 µg/L as opposed to 1.11 µg/L and 1.23 µg/L for January and February 2023, respectively. Although these values are still above the performance goal of 0.54 µg/L, pentachlorophenol itself is not subject to any performance goal.

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

GWRS Final Expansion Implications

OC San recently upgraded its facilities to support the GWRS Final Expansion. However, the 5-year performance data upon which the permitted performance goals were based can diverge from current and future plant performance data due to the additional volumes anticipated from the increase in water reclamation. The permit writers were informed of these operational improvements in advance and inserted provisions within the permit to allow OC San to request permit modifications to support additional water reuse. Although the GWRS Final Expansion has been online over this last year, it has not operated at full capacity (additional 30 MGD) for a significant period of time to see what impacts it might have on OC San's system. In the meantime, OC San has still been able to operate within the current permit limitations. However, these new flows and conditions should be considered during the next Permit cycle.

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

Table 2.12 Performance Goal Data for Fiscal Year 2023-2024
Orange County Sanitation District

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024
			(µg/L)											
Marine Aquatic Life Toxicants														
Arsenic, total recoverable	6.62	0	3.725	3.78	3.06	3.38	3.57	4.475	5.185	2.14	2.26	2.31	2.46	2.63
Cadmium, total recoverable	0.24	1	0.0837	0.0876	0.105	0.12	0.328	0.133	0.13	0.105	ND	ND	ND	ND
Chromium (VI)	1.55	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium (Total)			2.325	1.29	0.874	1.3	1.93	1.64	1.18	0.816	0.792	1.06	0.917	1.01
Copper, total recoverable	18.31	0	3.755	3.86	2.8	3.12	4.38	4.92	5.91	4.25	4.44	5.67	3.03	3.19
Lead, total recoverable	0.62	0	0.147	0.156	ND	ND	0.566	0.1565	ND	ND	0.552	ND	ND	ND
Mercury, total recoverable	0.0071	0	0.0043	0.0039	0.0039	0.0034	0.0042	0.0028	0.0041	0.0028	0.0026	0.0038	0.0038	0.0039
Nickel, total recoverable	23.50	0	11.7	9.6	6.93	8.27	16.8	10.685	8.56	4.74	6.17	6.39	5.26	7.54
Selenium, total recoverable	21.90	0	13.8	14.2	10.4	12.6	14.4	12.45	16.1	8.22	6.85	6.98	8.13	9.62
Silver, total recoverable	0.16	0	0.0218	0.0195	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc, total recoverable	46.01	0	32.4	35.4	24.4	31.1	37.8	44.45	28	26	22.9	26.1	15.8	24.6
Cyanide, total recoverable	5.88	1	5.3	6.2	4.04	4.8	5.6	5	4.8	ND	ND	2.2	2.7	NA
Ammonia as nitrogen	36,743	0	31,240	22,945	27,733	27,416	23,293	27,409	35,232	16,958	15,216	28,340	32,264	32,486
Non-chlorinated phenols	1.56	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Chlorinated phenols	0.54	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Endosulfan	0.011	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Endrin	0.021	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclohexane (HCH)	0.011	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Human Health Toxicants – Non-Carcinogens														
Acrolein	10.65	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Antimony	2.54	0	1.69	2.35	0.973	1.45	1.85	2.105	1.29	0.871	0.791	0.832	1.08	1.13
Bis(2-chloroethoxy) methane	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Bis(2-chloroiso-propyl) ether	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Chlorobenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Chromium (III)	1.55	3	2.325	1.29	0.874	1.3	1.93	1.64	1.18	0.816	0.792	1.06	0.917	1.01
Chromium (Total)			2.325	1.29	0.874	1.3	1.93	1.64	1.18	0.816	0.792	1.06	0.917	1.01
Di-n-butyl-phthalate	1.80	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Dichlorobenzenes	2.13	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Diethyl phthalate	0.76	0	0.62	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Dimethyl phthalate	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
4,6-dinitro-2-methylphenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA

Table 2.12 Performance Goal Data for Fiscal Year 2023-2024
Orange County Sanitation District

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024
			(µg/L)											
2,4-dinitrophenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Ethylbenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Fluoranthene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Hexachlorocyclopentadiene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Nitrobenzene	0.38	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Thallium	0.20	1	0.0277	0.0032	ND	ND	0.495	ND	ND	ND	ND	ND	ND	ND
Toluene	0.19	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Tributyltin	0.25	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1,1-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Human Health Toxicants – Carcinogens														
Acrylonitrile	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Aldrin	0.004	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Beryllium	1.07	0	0.0040	0.0029	ND	ND	0.364	ND	ND	ND	ND	ND	ND	ND
Bis(2-chloroethyl) ether	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Bis(2-ethylhexyl) phthalate	3.90	0	ND	ND	ND	ND	ND	ND	ND	ND	0.55	0.61	ND	NA
Carbon tetrachloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Chlordane	0.004	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorodibromomethane	4.25	0	0.98	NA	NA	2.61	NA	NA	0.58	NA	NA	NA	ND	NA
Chloroform	16.60	0	5.87	NA	NA	11.9	NA	NA	5.06	NA	NA	NA	2.72	NA
DDT	0.011	0	0.0093	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-dichlorobenzene	0.43	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
3,3'-dichlorobenzidine	1.47	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,2-dichloroethane	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,1-dichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Dichlorobromomethane	8.98	0	2.34	NA	NA	4.53	NA	NA	1.86	NA	NA	NA	ND	NA
Dichloromethane	4.26	0	1.96	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
1,3-dichloropropene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Dieldrin	0.007	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-dinitrotoluene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,2-diphenylhydrazine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Halomethanes	0.43	1	0.261	NA	NA	0.9185	NA	NA	0.192	NA	NA	NA	ND	NA
Heptachlor	0.009	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Table 2.12 Performance Goal Data for Fiscal Year 2023-2024
Orange County Sanitation District

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024
			(µg/L)											
Heptachlor epoxide	0.004	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Hexachloroethane	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Isophorone	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodimethylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodi-n-propylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
N-nitrosodiphenylamine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
PAHs	1.59	0	ND	ND	ND	0	ND	ND	ND	ND	ND	ND	ND	NA
1,1,2,2-tetrachloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Tetrachloroethylene	1.58	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
Trichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
1,1,2-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA
2,4,6-trichlorophenol	0.54	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Vinyl chloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	NA	ND	NA

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

Chapter 3. Permits

3.1 Introduction

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

3.2 Permit Classifications

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

Class I Permits

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

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

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

Class II Permits

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

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

1. Has a charge for use greater than the special assessment "OC San Sewer User Fee" included on the County of Orange secured property tax bill exclusive of debt service; and
2. Discharges waste other than sanitary; and
3. Is not otherwise required to obtain a Class I permit.

Wastehauler Permits

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

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

Special Purpose Discharge Permits

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

Fats, Oils, and Grease (FOG) Permits

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

Discharge Certifications

A Discharge Certification may be issued to non-categorical industries that generate wastewater containing pollutants of concern and have the potential for violating any pretreatment standard or requirement. Zero Discharge Certifications are issued to those industries that have operations subject to a federal category regulated by the US EPA, but do not discharge industrial wastewater generated from these operations to the sewer.

3.3 Permit Issuance

During FY 2023/24, the pretreatment program managed a total of 542 active permits/certifications. A total of 42 new permits were issued, including 21 Class I permits, one FOG permit, eight waste hauler permits, four special purpose discharge permits, and seven zero discharge certifications. Forty-seven permits were listed as void or expired during the fiscal year (most due to ownership, location, or class changes and subsequent re-issuances), including 27 Class I permits, two Class II permits, three FOG permits, 10 Special Purpose Discharge Permits, and five waste hauler permits. Of the 333 Class I permits (SIUs), 204 were subject to Federal Categorical Pretreatment Standards. This level of permit activity represents no significant change compared to the total number of active permits at the end of the previous fiscal year.

3.3.1 Identification of New Permittees

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

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

Historically, most new permittees had been identified by OC San field inspectors during the course of inspecting existing permittees, and when following up on new industries that move into a former permittee's company location. Since 2018, OC San has collaborated with all of its member agencies and set up an ongoing program to collect data on all new and renewed business licenses. The initial effort collected data

quarterly to space out the license review, but the program now collects data on a semiannual basis to stay current. The initial effort also included a plan for OC San to identify industrial dischargers from county and unincorporated areas where business licenses are not issued. These areas require physical searches to ensure that OC San's entire service area is evaluated to comply with US EPA's requirements for a comprehensive Industrial Waste Survey.

3.4 Discharge Limits

3.4.1 Industrial

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

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

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

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 biodegradable waste that express the maximum expected heavy metal concentrations for domestic wastes found in septic tank/cesspool wastes. These limits are shown in Table 3.2.

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 wastewater constituents. Most Class I permits are issued both concentration-based limits and mass emission limits to encourage water conservation, waste minimization, and recycling; to limit the total mass of pollutants that enter the treatment facilities; and to deter facilities from achieving compliance through dilution. For concentration limits, OC San applies either the Federal Categorical Standards or OC San's local discharge limits (shown in Table 3.21), whichever are more stringent. Mass emission rate limits are calculated using the applicable concentration limits in combination with an industry's multi-year average wastewater flow (referred to as a "flow base" rate). The flow base rate is determined at the time a permit is initially issued, renewed, or revised.

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

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

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

Chapter 4. Inspection, Sampling, Compliance, & Enforcement

4.1 Introduction

This chapter details the inspection, sampling, and enforcement activities of the OC San Industrial Pretreatment Program for FY 2023/24.

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 2023/24 (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 discharge limits.

During FY 2023/24, OC San staff conducted 1,640 inspections and collected 3,204 samples. Compared to last fiscal year, the number of conducted inspections increased this year by 6% and the number of samples decreased by 11% (Table 4.1).

	Fiscal Years				
	2019-20	2020-21	2021-22	2022-23	2023-24
Inspections*	1,422	1,664	1,611	1,542	1,640
Samples Collected	3,831	3,515	3,648	3,591	3,204

*Site visits to facilities to assess compliance.

4.3 Non-Routine Sampling and Inspection

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

- Enforcement inspections are performed in response to compliance problems and typically involve close cooperation with the permittee to identify and correct deficiencies. Source Control Inspectors resample noncompliant industries within 30 days from the date the violation is issued and submit compliance inspection reports to document corrective measures taken and to support enforcement actions.
- Inspectors participate in multi-agency operations such as warrant inspections and environmental audits, working jointly with other agencies enables inspectors to recognize potential problems in other regulatory areas such as air quality and hazardous waste.
- Chronic violators are subject to increased monitoring and inspection activity, which may include extended periods of on-site sampling.
- Source Control Inspectors perform routine sampling for cyanide at facilities that have cyanide processes on site. The sampling occurs at the end of cyanide treatment or at the end of the cyanide process, prior to comingling with non-cyanide bearing wastestreams. The purpose of this sampling is to confirm that all cyanide-bearing wastewater is treated.
- Random sampling throughout the collection system is performed in areas where there is an increased potential for illegal dumping by industries. These sampling events are generally precursors to downstream monitoring projects (described in Section 4.3.1) when illicit discharging is suspected.
- Field support is provided to the Non-Industrial Source Control (NISC) team within the Resource Protection Division in support of their ongoing programs, including inspections at 10 radiator shops and quarterly sampling at 21 Dry-Weather Urban Runoff diversions.
- Providing resources to OC San's operations, collections, compliance, and laboratory groups in performing sampling and inspections in relation to special studies or ongoing projects.
- On a monthly basis Source Control Inspection staff collect composite samples on each of OC San's 12 trunklines at both OC San plants for several days to one week. This monitoring allows OC San to identify any potential problems on individual trunklines, as well as to study the correlation between influent, effluent, and biosolids.

4.3.1 Downstream Sampling

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

Two downstream monitoring events were conducted during FY 2023/24.

4.4 Orange County Hazardous Materials Strike Force and Joint Agency Inspections

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

OC San staff spent approximately 65 hours assisting the Strike Force in FY 2023/24 by attending meetings and conducting fieldwork in support of Strike Force activities. In FY 2023/24, 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 2023/24 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 fiscal 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, 2024, of the active 333 Class I permittees, there were 37 (11.1%) that had been classified as SNC; 27 of these were categorical industries, and 10 were non-categorical. An industry was determined to be SNC if it incurred a violation that met one or more of the criteria listed below as provided in 40 CFR, Part 403.

- Chronic violations of wastewater discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits.
- Technical Review Criteria (TRC) violations, also known as "acute violations," defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement, (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW ("Publicly Owned Treatment Works," which in this case is OC San) determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public).

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

A summary of the permittees in SNC is presented in Table 4.2. The SNC list was published in the October 26, 2024 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 2023/24 Orange County Sanitation District, Resource Protection Division			
Company Name	Permit No.	Category	City
<u>Industries SNC Due to Discharge Violations</u>			
Air Industries Company, A PCC Company (Knott)	1-531404	Metal Finishing, Nonferrous Metals Forming And Metal Powders	Garden Grove
Allied International	1-031107	Soap And Detergent Manufacturing	Buena Park
Aluminum Precision Products, Inc. (Susan)	1-011100	Aluminum Forming	Santa Ana
BAZZ HOUSTON CO .	1-031010	OC San Local Limits	Garden Grove
Cali Chem Inc. dba Be Beauty	1-601976	Soap And Detergent Manufacturing	Garden Grove
CP-Carrillo, Inc. (McGaw)	1-571316	OC San Local Limits	Irvine
Dr. Squatch Bricc City	1-602045	Soap And Detergent Manufacturing	Brea
Embee Processing (Anodize)	1-600456	Electroplating, Metal Finishing	Santa Ana
Harbor Truck Bodies, Inc.	1-021286	Metal Finishing	Brea
McKenna Labs, Inc.	1-021422	Pharmaceutical Manufacturing, Soap And Detergent Manufacturing	Fullerton
Mercial, LLC	1-600655	Pharmaceutical Manufacturing	Orange
Patriot Wastewater, LLC (Freedom CWT)	1-521861	Centralized Waste Treatment	Orange
Power Distribution, Inc.	1-511400	OC San Local Limits	Santa Ana
Q-Flex Inc.	1-600337	Metal Finishing	Santa Ana

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2023/24 Orange County Sanitation District, Resource Protection Division			
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	Aluminum Forming, Metal Finishing, Nonferrous Metals Forming And Metal Powders	Santa Ana
Stainless Micro-Polish, Inc. (Previous Ownership)	1-021672	Metal Finishing	Anaheim
Terra Universal, Inc.	1-601407	Metal Finishing	Fullerton
Universal Molding Co.	1-521836	Metal Finishing	Fullerton
<u>Industries SNC Due to Reporting Violations</u>			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Aviation Equipment Processing	1-071037	Metal Finishing	Costa Mesa
Beo-Mag Plating	1-511370	Metal Finishing	Santa Ana
Bioduro LLC (Fairbanks)	1-601616	Pharmaceutical Manufacturing	Irvine
Bioduro LLC (Jeronimo)	1-601617	Pharmaceutical Manufacturing	Irvine
Brasstech, Inc	1-600316	Metal Finishing	Santa Ana
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
DS Services of America	1-021393	OC San Local Limits	Santa Ana
Electron Plating III, Inc.	1-021336	Metal Finishing	Garden Grove
Emerald SoCal, LLC / Emerald Orange	1-601615	OC San Local Limits	Orange
International Paper Company (Buena Park Bag)	1-531419	OC San Local Limits	Buena Park
Joint Forces Training Base, Los Alamitos	1-031270	OC San Local Limits	Los Alamitos
Koia Anaheim Facility, LLC	1-601767	OC San Local Limits	Anaheim
PCX Aerosystems - Santa Ana	1-601618	Metal Finishing	Santa Ana
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	Pharmaceutical Manufacturing	Santa Ana
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	OC San Local Limits	Buena Park
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim
<u>Industries SNC Due to Discharge and Reporting Violations</u>			
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
RBC Transport Dynamics Corp.	1-011013	Metal Finishing	Santa Ana

4.6 Enforcement Activities

During FY 2023/24, OC San initiated or continued various enforcement actions to bring industries into compliance. This section describes the types of enforcement actions taken against noncompliant SIUs. In addition, Appendix J shows a listing of pretreatment equipment that has been installed by OC San's permittees.

As provided in the Ordinance and ERP, OC San has a broad range of enforcement mechanisms available, including, but not limited to, issuing noncompliance sampling fees, administrative penalties, notices of violation, compliance letters, probation orders, enforcement compliance schedule agreements (ECSA), instituting emergency suspension orders, permit suspension, and permit revocation orders.

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

4.6.1 Compliance Inspections

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

During FY 2023/24 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 2023/24 OC San conducted **11 compliance meetings**.

4.6.3 Compliance Requirement Letters

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

During FY 2023/24 OC San issued **33 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 2023/24 OC San issued **three 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 2023/24, OC San issued **188 notices of violations to 119 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 2023/24, noncompliance fees, penalties, settlements, interest, and judgements totaling \$86,735 were issued to SIUs (for details see Appendix D). Fees also include those from SNC permittees whose names were published in the local newspaper, and for individual self-monitoring noncompliance fees.

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

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

During FY 2023/24 OC San did not issue any **notices to inform for intentional falsification of self-monitoring reports**.

4.6.7 Probation Orders

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

During FY 2023/24 OC San issued **one probation order**.

4.6.8 Enforcement Compliance Schedule Agreement

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

During FY 2023/24, OC San **did not issue any enforcement compliance schedule agreements**.

4.6.9 Regulatory Compliance Schedule Agreement (RCSA)

Subsequent to the issuance of an Industrial Wastewater Discharge Permit to an industrial user, Federal Categorical Pretreatment Standards may be adopted or revised by the US EPA, or OC San may enact revised discharge limits. If the General Manager, or their designee, determines that a permittee would not be in compliance with the newly adopted or revised discharge limits, the permittee may be required to enter into a RCSA with OC San. The terms and conditions of a RCSA require the permittee to achieve compliance with all new standards by a specific date. RCSAs have a maximum term of two hundred seventy (270) days.

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

During FY 2023/24 OC San did not issue any **regulatory compliance schedule agreements**.

4.6.10 Administrative Complaints, Penalties, and Settlement Agreements

Pursuant to the authority of California Government Code Section 54740.5, OC San may issue administrative complaints and penalties against the responsible officer or owner of any company that violates any permit condition or effluent limit. In accordance with an OC San Board of Directors Resolution No. OCSD 98-23, 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 2023/24, OC San did not issue any **administrative complaints**.

4.6.11 Permit Suspensions

When OC San believes that grounds exist for permit suspension, the permittee is notified in writing of the reasons for permit suspension and the date of the permit suspension hearing. At the hearing, OC San staff and the permittee are provided the opportunity to present evidence to a designated hearing officer. After the conclusion of the hearing, a written determination is made by the hearing officer. Upon issuance of a suspension order, the permittee must cease all discharges to the sewer for the duration of the suspension.

During FY 2023/24, OC San **did not issue any permit suspensions**.

4.6.12 Permit Revocations

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

During FY 2023/24 OC San **did not issue any permit revocations**.

4.6.13 Emergency Suspension Order

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

During FY 2023/24, OC San **did not issue any emergency suspension orders**.

4.6.14 Civil/Criminal Complaints

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

During FY 2023/24, OC San **did not file any civil or criminal complaints**.

4.7 Enforcement Summary

This section summarizes various enforcement actions conducted for in FY 2023/24 reporting year. Potential enforcement actions include but are not limited to compliance inspections, compliance meetings, probation orders, enforcement compliance schedule agreements, regulatory compliance schedule agreements, orders to cease, permit suspensions, and permit revocations.

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

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

reduction, pH adjustment, flocculation, metal precipitation, and clarification. ATP utilizes a filter press for sludge dewatering.

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

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

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

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

Although ATP submitted several proposals to OC San in March 2023, the proposals had multiple deficiencies including an incomplete waste characterization, missing technical specifications related to treatment chemistry, the transfer of waste using drums and flex hosing, and omitting correspondence with chemical vendors. As a result of the deficient proposal and an operations and maintenance manual, ATP was directed to resubmit both by June 2023.

July 1 – December 31, 2023

On July 10, 2023, ATP resubmitted an operations and maintenance manual. After review, the manual contained several deficiencies related to waste characterization, treatment chemistry, and chemical vendor correspondence. Moreover, ATP failed to resubmit a proposal to ensure adequate treatment of all generated wastestreams.

On July 26, 2023, ATP had a daily average zinc violation for which an NOV was issued on August 7, 2023. On October 11, 2023, OC San conducted a compliance inspection, at which time, ATP was unable to readily identify the source for the zinc violation. During the inspection, ATP was unable to furnish batch logs for several dates on which the facility reported self-monitoring sampling and discharge. OC San also noted it was unclear if ATP had complied with pretreatment equipment calibration requirements based on the facility records available for review.

January 1 – June 30, 2024

On January 25, 2024, ATP exceeded the daily maximum discharge limit for zinc, for which an NOV was issued on February 12, 2024. On February 29, 2024, OC San conducted a compliance inspection. At the time of inspection, ATP attributed the zinc violation to insufficient filtration of fine particles. As a corrective action, ATP installed a 50-micron filter downstream of the facility's clarifier.

Based on prior enforcement, OC San has drafted an ECSA to address deficiencies related to facility figures, waste characterization, recordkeeping, pretreatment, and chemical vendor correspondence.

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

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

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

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On January 3, 2024, AIC exceeded the daily maximum and loading daily maximum discharge limits for cadmium, for which an NOV was issued on January 29, 2024. On January 17, 2024, OC San issued the NOV for the exceedances of the instantaneous, daily maximum, and loading daily maximum discharge limits for cadmium, which occurred December 12, 2023. A root cause and corrective action report was requested to be submitted by February 15, 2024. In January 2024, AIC-Knott exceeded the monthly average discharge limits for fluoride and nickel, for which an NOV was issued on April 3, 2024. On February 14, 2024, AIC-Knott exceeded the daily maximum and loading daily maximum discharge limits for cadmium,

for which an NOV was issued on March 11, 2024. On February 20, 2024, OC San issued an NOV for the November 2023 fluoride monthly average discharge limit exceedance. In February 2024, AIC-Knott exceeded the cadmium and nickel monthly average discharge limits, for which an NOV was issued on May 1, 2024. On May 14, 2024, AIC-Knott exceeded the instantaneous, daily maximum, and loading daily maximum discharge limits for nickel, for which an NOV was issued on May 28, 2024.

On June 25, 2024, a compliance inspection was conducted to address the nickel violation, the Site contact stated operator error due to SOPs regarding drag out procedures not being followed by operators. OC San also observed operators not following proper drag out procedures during an inspection. As a result, OC San has drafted a compliance requirements letter to address any deficiencies.

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

Allied Electronics Services, Inc. (Permit No. 1-011073)

Allied Electronics Services, Inc. (Allied Electronic) is an independent printed circuit board (PCB) shop that specializes in prototype development, quick turn-around, and small production orders for commercial applications. Wastewater is generated from their rinses associated with cleaning, plating, etching, and other finishing operations. Spent solutions are hauled for off-site disposal. Their treatment system consists of a continuous system with hydroxide precipitation and flocculation follow by solids settling prior to discharge. Settled solids are also hauled for off-site disposal.

July 1 – December 31, 2023

Allied Electronic had no violations during this reporting period.

January 1 – June 30, 2024

On January 29, 2024, Allied Electronic had a pH violation, for which an NOV was issued on February 12, 2024.

On March 6, 2024, OC San conducted a compliance inspection at Allied Electronic. During the compliance inspection, Allied Electronic indicated that their developer was cleaned with 10% muriatic acid in December 2023. The rinse water containing the muriatic acid was not neutralized before being discharged to the treatment system in January 2024, which led to a small but concentrated amount of acidic wastewater going to the treatment system. Allied Electronic stated this type of issue will be addressed and corrected for future equipment cleaning procedures.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

Allied had no violations within the reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 4, 2024, OC San issued an NOV for the October 2023 zinc monthly average discharge limit exceedance. ADC attributed the zinc exceedance to lack of routine cleaning and maintenance of the treated water storage tank as well as significant employee turnover.

In January 2024, ADC exceeded the monthly average discharge limit for zinc, for which an NOV was issued on April 2, 2024. In February 2024, ADC exceeded the monthly average discharge limit for zinc, for which an NOV was issued on May 1, 2024. In April 2024, ADC exceeded the monthly average discharge limit for zinc, for which an NOV will be issued in the following reporting period.

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

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 24, 2024, OC San issued a compliance requirements letter to Alloy Tech that rejected Alloy Tech's June 30, 2023 proposal. The proposed treatment modification did not provide effective treatment of molybdenum and would have led to an accumulation of molybdenum within the treatment system. OC San required Alloy Tech to resubmit a revised proposal by March 29, 2024.

On April 17, 2024, Alloy Tech resubmitted a proposal to OC San for molybdenum treatment. Alloy Tech proposed to use a batch tank to treat wastewater by mixing ferrous sulfate to flocculate solids and then adding caustic soda to increase the pH to 5.0. After solids settling for two days, the wastewater and solids would be transferred to separate tanks. Caustic soda would be added to the wastewater to raise the pH to 8.5, after which solids are allowed to settle for an additional two days. Treated wastewater is discharged to the sewer after compliance with discharge limits is verified using onsite analysis. OC San continues to review the new proposal.

On June 20, 2024, Alloy Tech exceeded the instantaneous and daily maximum discharge limits for molybdenum, for which an NOV will be issued in the following reporting period.

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

AlSCO, Inc. dba AlSCO Uniforms (Permit No. 1-021656)

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 3, 2024, OC San issued an NOV for the O&G min. loading daily average limit exceedance which occurred on October 24, 2023.

On January 11, 2024, OC San conducted a compliance inspection to investigate the O&G min. exceedance. At the time of inspection, AlSCO was unable to readily identify the cause for the violation, and a corrective action was not determined. During the inspection, AlSCO verbally indicated the facility does not believe the mass loading violation was the result of a hydraulic line rupture.

On March 27, 2024, OC San issued a compliance requirements that required AlSCO to submit a corrective action report by April 15, 2024. On April 15, 2024, AlSCO submitted a corrective action report which attributed the O&G min. exceedance to an error in method analysis by its contract laboratory. An internal audit conducted by the contract laboratory determined laboratory personnel failed to add silica gel proportionate to n-hexane extractable material. The laboratory stated the reported actions were a direct result of inadequate training. As corrective actions, the contract laboratory updated recordkeeping requirements and retrained all personnel for oil and grease analysis. Subsequently, AlSCO collected several O&G-min. samples that demonstrated compliance with discharge limits.

AlSCO had no further violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

Aluminum Forge had no further violations during this reporting period. OC San is following up on formal verification of corrective actions by Aluminum Forge.

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

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

Aluminum Precision Products (APP) manufactures parts for the aerospace, automotive, commercial, military/defense, recreational, and transportation industries. Aluminum Precision's processes 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, 2024

APP had no violations during this reporting period.

January 1 – June 30, 2024

On January 4, 2024, APP exceeded the instantaneous, daily maximum, and production-based loading daily average discharge limits for zinc, for which an NOV was issued on January 31, 2024. On January 24, 2024, APP exceeded the instantaneous and daily maximum discharge limits for copper, for which an NOV was issued on February 12, 2024.

On February 28, 2024, OC San conducted a compliance inspection to investigate the source of the zinc and copper exceedances which occurred on January 4 and January 24, 2024, respectively. During the inspection, APP noted that the likely source of the zinc was from galvanized steel rollers in their non-destructive testing area. Wastewater from the non-destructive testing area is pumped to a polishing filter prior to sewer discharge. A source for the copper violation was not able to be identified. The continuous treatment system appeared to be functioning properly, and APP presented their daily pH calibration records which indicated that their two pH probes were working properly.

In February 2024, APP exceeded the monthly average discharge limit for zinc, for which an NOV was issued on May 1, 2024. On March 4, 2024, OC San issued an NOV for the December 2023 zinc monthly average discharge limit exceedance. On March 14, 2024, APP again exceeded the instantaneous and daily maximum discharge limits for copper, for which an NOV was issued on April 10, 2024. On April 24, 2024, OC San conducted a compliance inspection to investigate the source of the copper exceedance which occurred on March 14, 2024, during which the source for the copper exceedance could not be readily identified.

On June 27, 2024, OC San issued a compliance requirements letter for APP to attend a compliance meeting during the next reporting period to discuss the copper and zinc wastewater discharge noncompliance.

OC San will continue enforcement during the next reporting period and continue to monitor APP discharge and compliance status during the next reporting cycle.

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

Aluminum Forge produces parts for aerospace, military, automotive and commercial applications, ranging from piston heads to window frames. The campus has a total of 11 hydraulic presses ranging from 300 to 3,500 tons. Aluminum and associated dies are preheated to 750° F. The heated metal is block formed in the first operation. Parts are quenched, then sent to one of two caustic etch lines to clean the mold release compound from the part. The etch lines consists of a caustic cleaner, acid cleaner, three countercurrent rinses, and a final hot deionized water rinse. Both etch lines are identical in layout and size. Wastewater is generated from rinses from the clean and etch processes and is treated in a continuous pretreatment system consisting of precipitation, flocculation, coagulation, filtration, and clarification.

July 1 – December 31, 2023

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

January 1 – June 30, 2024

A compliance requirements letter is being drafted to request a root cause and corrective action report from Aluminum Forge. OC San will continue enforcement during the next reporting period and will continue to monitor Aluminum Forge's discharge and compliance status on a quarterly basis.

Amerimax Building Products (Permit No. 1-021102)

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

July 1 – December 31, 2023

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

Amerimax had no further violations during this reporting period and subsequent sampling demonstrated compliance with permit limits. Therefore, no further enforcement actions are required at this time and this enforcement case is closed.

January 1 – June 30, 2024

During a routine facility inspection on June 18, 2024, OC San noted a change of ownership had occurred in March of 2024, for which OC San was not notified. OC San will continue enforcement during the next monitoring period and continue to monitor Amerimax's discharge and compliance status on a quarterly basis.

AnoChem Coatings (Permit No. 1-600295)

AnoChem Coatings (AnoChem) is a job shop anodizing facility, and its operations include anodizing, chemical etching, and coating. AnoChem primarily performs Type II anodizing of customer-supplied aluminum parts. Parts are used in all industries, including automotive, aerospace, and medical. Aluminum parts received from the customers are cleaned in an alkaline detergent, subjected to deoxidizing, and then anodized clear or dyed a color, followed by a nickel seal. Colored tanks include black, blue, red, gold, and maybe combined for several others. Cleaned aluminum parts may also be chem-filmed only and readied for corrosive resistant painting by third parties. Anochem also conducts passivation on stainless steel with nitric and citric acids.

Wastewater-generating operations include alkaline cleaning, deoxidizing, etching, chem-film, anodizing, dyeing, nickel sealing, and associated rinses. The wastewater undergoes continuous pH adjustment in the two-stage treatment tank prior to discharge to the sewer. Rinse water with potential for hexavalent chrome from chem-film operations is closed loop and recycled through ion exchange tanks with resin regenerated off-site.

July 1 – December 31, 2024

AnoChem had no violations during this reporting period.

January 1 – July 31, 2024

On April 24, 2024, AnoChem exceeded the instantaneous, daily maximum, and loading daily maximum discharge limits for copper, and daily maximum and loading daily maximum discharge limits for nickel, for

which an NOV was issued on May 28, 2024. These exceedances resulted in monthly average discharge limit exceedances for copper and zinc in April 2024, for which an NOV will be issued in the following reporting period.

On June 19, 2024, OC San conducted a compliance inspection at AnoChem. AnoChem attributed the exceedances to sludge build-up within the sample point box. As a result, Anochem installed a false bottom within the sample box instead of a grate and increased the cleanout-out frequency of the sample box.

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

APCT Orange County (Permit No. 1-600503)

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

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

In September 2022 and March 2023, APCT had copper violations which were attributed to a malfunction of the filter press and accumulation of sludge. In response to a compliance requirement, APCT submitted a proposal to prevent sludge from discharging to the sample point and rerouting wastewater flow for additional treatment.

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On January 17, 2024, OC San conducted a compliance inspection to investigate the source of the copper exceedance observed on November 4, 2023. APCT staff explained that their maintenance crew identified two solenoid valves that were malfunctioning, allowing an excess of wastewater to flow to the treatment

system. The malfunctioning solenoid valves were replaced prior to the compliance inspection. APCT had no violations during this reporting period.

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

Arrowhead Products Corporation (Permit No. 1-031137)

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

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

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

July 1 – December 31, 2023

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

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

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

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

January 1 – June 30, 2024

On January 10, 2024, OC San conducted a compliance inspection to investigate the source of the fluoride violation observed on November 2, 2023. Upon arrival, the continuous treatment system and temporary batch system both appeared to be functioning correctly. OC San and Arrowhead staff compared the grab sample data from the batch tanks along with the composite sample data from the designated sample point during the period of the observed fluoride violation. The grab sample from the batch tanks during the period of time in which the violation occurred indicated to Arrowhead staff that the batch was likely going to be in compliance with permitted fluoride limits and it was determined that the batch could be discharged to the sewer.

In January 2024, Arrowhead exceeded the production based loading monthly average discharge limit for fluoride, for which an NOV was issued on April 1, 2024. On February 5, 2024, OC San issued an NOV for the November 2024 fluoride production based loading monthly average discharge limit exceedance. On May 23, 2024, Arrowhead exceeded the production based loading daily maximum discharge limit for nickel, for which an NOV will be issued during the following reporting period.

On May 29, 2024, Arrowhead submitted a revised long-term compliance plan to OC San. The plan is currently under review.

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

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

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

July 1 – December 31, 2023

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

On October 6, 2023, Avid had a slug discharge of approximately 34.5 gallons of wastewater with an estimated pH range between 5.4 and 6.0 from their waste neutralization system. On October 12, 2023, Avid provided written notification via email of the slug discharge to OC San. Avid attributed the slug discharge to an operator manually engaging the waste neutralization pump to convey wastewater to the compliance sample point while the waste neutralization system was actively adjusting pH levels. As a corrective action,

Avid implemented training of facility personnel to measure the pH of the wastewater to ensure the pH levels are within permit discharge limits prior to manually engaging the waste neutralization pump. On November 9, 2023, OC San issued an NOV to Avid for failure to comply with ordinance prohibitions for notification of a spill or slug loading, which requires immediate notification to OC San by telephone.

Avid had no further violations during this reporting period and subsequent sampling has demonstrated compliance with permit limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

January 1 – June 30, 2024

Avid had no violations during this period.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 4, 2024, Bazz had an O&G min violation, for which an NOV will be issued in the following reporting period. OC San continued to review the root cause analysis and corrective action report received from the previous reporting period.

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

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

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

A compliance inspection in February 2022 determined Beverage Visions' pretreatment system does not provide sufficient hydraulic retention for adequate pH adjustment. In March 2022, OC San issued a compliance inspection summary and requirements letter that directed Beverage Visions to submit a proposal to install an automated pH adjustment system. Beverage Visions had submitted several proposals between March 2022 and June 2023; however, OC San rejected each as specified operating parameters and peak flowrate were inconsistent with measured discharge. Moreover, several proposals lacked critical process equipment. As a result, OC San was unable to successfully evaluate the adequacy of the proposed treatment system.

July 1 – December 31, 2023

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

Beverage Visions to address the design parameter deficiencies and to resubmit a proposal for adequate pH adjustment.

January 1 – June 30, 2024

On January 14, 2024, Beverage Visions submitted a final proposal for an adequate pH adjustment system. OC San has accepted the proposal and has drafted an ECSA.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

Bioduro Jeronimo had no further violations during this reporting period and subsequent sampling has demonstrated compliance with permit limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

There are three process lines for electroplating with non-precious metals including trivalent chromium. The three process lines are for plating with nickel and trivalent chrome, oxide line, and stripping for reworked parts. Lines have automated hoists and have no spaces between tanks for dragout. Flow controls are manual valves, but water is recycled so dilution is not an immediate concern. Rinse water is captured and directed to recirculation ion-exchange tanks or further treatment and discharge. Process solutions are batch treated and discharged to the sewer or hauled as needed. Products are all brass-based alloys, where

copper and zinc ratios are adjusted for hardness. Other metals may be combined to adjust for machinability, corrosion, or other physical and chemical properties including aluminum, lead, and arsenic.

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

Brasstech was issued an NOV on September 1, 2022 for a monthly average zinc limit violation observed in June 2022. OC San received a corrective action report on March 2, 2023, regarding the monthly average limit violation for zinc observed in June 2022, indicating that Brasstech suspected zinc from the brass spigot on the sampling tank.

July 1 – December 31, 2023

OC San performed a compliance inspection on October 25, 2023, and observed that the brass spigot was removed and replaced with a plastic spigot at the sampling tank as stated in the corrective action report sent to OC San on March 2, 2023. Subsequent sampling demonstrated compliance with discharge limits.

January 1 – June 30, 2024

Brasstech had no violations during this reporting period and subsequent sampling has demonstrated compliance with permit limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

As a result of pH noncompliance in February 2023, Brea Power identified deficient caustic dosing and implemented corrective actions which included an integrated system to allow for real-time continuous pH monitoring as a long-term corrective action.

July 1 – December 31, 2023

During an inspection on September 20, 2023, OC San verified that the installation of new real-time continuous pH monitoring equipment had been completed by Brea Power. Brea Power had no violations during this reporting period.

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

January 1 – June 30, 2024

Brea Power had no violations during this reporting period and subsequent sampling has demonstrated compliance with permit limits. Therefore, no further enforcement is required at this time and this enforcement case is closed. OC San will continue to monitor Brea Power's discharge and compliance status on a quarterly basis.

Bristol Industries (Permit No. 1-021226)

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 26, 2024, OC San issued an NOV for the zinc instantaneous discharge limit exceedance which occurred on October 31, 2023. On February 7, 2024, OC San conducted a compliance inspection to investigate the root cause of the violation, collect a resample, and review facility operations. During the inspection, Bristol attributed the zinc violation to wastewater generated during an ion exchange resin changeout of the cyanide treatment unit final polishing canisters.

On March 7, 2024, Bristol submitted their corrective action report, which provided a description of the incident, investigation, observations, corrective actions and conclusions. Bristol reported that there was no known source of zinc in their manufacturing operations since zinc-based coatings and plating operations are not employed at the facility. However, Bristol did determine during their investigation that the source of the zinc was virgin UXA-1P resin installed in the cyanide wastewater treatment unit. Based on their findings, Bristol determined that the initial rinse step of ion exchange resin during a changeout event appeared to flush zinc at levels above the allowable instantaneous discharge limit. As a corrective action, Bristol modified their ion exchange resin changeout procedure to divert the initial rinse wastewater to the cyanide accumulation holding tank for treatment versus previously directly discharging to the sample point. Resample results demonstrated compliance with discharge limits.

On June 5, 2024, Bristol exceeded the daily maximum discharge limit for silver, for which an NOV was issued on June 25, 2024.

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

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

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

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

July 1 – December 31, 2023

On October 12, 2023, Cali Chem had an O&G-min violation, for which an NOV was issued on October 30, 2023. A root cause analysis and corrective action report was requested to be submitted by November 30, 2023. On December 14, Cali Chem submitted their corrective action report where they attributed the cause of the violation to build up in their sampling point. As part of their corrective action, Cali Chem has implemented a cleaning scheduling once every 2 weeks.

January 1 – June 30, 2024

On January 17, 2024, Cali Chem exceeded the instantaneous and daily maximum discharge limits for O&G min., for which an NOV was issued on February 9, 2024.

On May 22, 2024, OC San conducted a compliance inspection to investigate the O&G min. violation. Cali-Chem stated the oil filler station contributed to the exceedance as the hoses, nozzles, and heads are cleaned at the end of a depleted tote. The black sump is cleaned weekly to comply with O&G min. A compliance requirements letter is being drafted.

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

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

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

In October 2019, OC San issued a compliance requirements letter requiring Cargill to develop a stormwater mitigation plan to divert stormwater from sewer discharge. From 2020 to 2023, Cargill submitted multiple proposals to prevent the discharge of stormwater to the sewer.

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On February 28, 2024, Cargill submitted a revised stormwater mitigation proposal to OC San, specifically addressing the requirement to store accumulated stormwater collected at the sump in the Rail Unloading Area and to prevent stormwater intrusion from the additional drains in the Rail Unloading Area and the Packing Truck Receiving Area. The proposal is currently under review.

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

CJ Foods Manufacturing LLC (Permit No. 1-602061)

CJ Foods Manufacturing LLC (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. In June 2021, CJ Foods installed a solenoid valve downstream of the chemical feed pump that is controlled by the pH controller to prevent siphoning from occurring.

July 1 – December 31, 2023

CJ Foods had no violations during this monitoring period.

January 1 – June 30, 2024

On February 21, 2024, CJ Foods had a pH violation, for which an NOV was issued on March 11, 2023.

On March 13, 2024, CJ Foods submitted their root cause and corrective action report via email. CJ Foods attributed the pH violation to solids accumulation around its pH sensor. This caused an overdosing of caustic into the clarifier due to inaccurate readings. As a corrective action, CJ Foods cleaned the sensors, and will increase their monitoring of the pH system readings.

CJ Foods had no further violations during this monitoring period and subsequent sampling has demonstrated compliance with permit limits. Therefore, no further enforcement is needed at this time and this enforcement case is closed.

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

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

Coastline Metal Finishing Corp. A Division of Valence Surface Technologies (Coastline) is a medium size metal finishing job shop for a wide variety of customers in the electronics, medical, aerospace, military, defense and optical industries. Operations includes alkaline cleaning, caustic etch, precious metals electroplating, nickel plating, anodizing, chemfilm, dyeing, passivation, pickling, and tin/tin-lead electroplating. Coastline has three close looped ion exchange systems for removal of nickel, tin-lead, chrome, precious metals and cyanide from the rinse streams. The discharge at Coastline consists primarily of selected running rinses that are pH adjusted in the sump and discharged to equalization tanks and then to the sewer.

In March 2022, Coastline had a pH violation. Coastline attributed the pH violation to a miscommunication between their operators where operators did not run caustic rinses while running the anodizing rinses. In April 2022, Coastline had another pH violation. In May 2022, Coastline submitted a proposal to install an automatic pH adjustment and monitoring system with audio and visual alarms. As an immediate corrective action for the pH violation, Coastline had installed the automatic pH adjustment system prior to OC San acceptance of Coastline's proposal. From 2022 to 2023, the implementation of the accepted proposal was delayed due to procurement of equipment and identification of additional rinse tanks. As a result, Coastline was required to submit a revised pH adjustment system proposal.

July 1 – December 31, 2023

On July 14, 2023, Coastline submitted a revised proposal with corresponding drawings. On August 3, 2023, OC San accepted Coastline's proposal and issued a compliance requirements letter requiring Coastline to complete the implementation of the proposal by August 31, 2023. The letter also required Coastline to submit logged pH data for six months to verify effectiveness of the implemented proposal. Coastline completed the implementation of the proposal on August 31, 2023.

January 1 – June 30, 2024

On June 18, 2024, Coastline exceeded the pH discharge limit, for which an NOV was issued on June 25, 2024.

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

Color Fashion Dye and Finishing, LLC (Permit No. 1-602149)

Color Fashion Dye and Finishing, LLC (Color Fashion Dye and Finishing) cleans and dyes textiles. Operations include scouring and cleaning, dyeing, drying, and fabric conditioning. Wastewater generated from the facility's wash and conditioning cycles discharges to an equalization tank, through a rotary filter and filter cloth, then to sewer.

July 1 – December 31, 2023

Color Fashion Dye and Finishing had no violations during this reporting period.

January 1, 2024 – June 30, 2024

On March 14, 2024, OC San issued an NOV to Color Fashion Dye and Finishing for failure to submit a slug control plan, a proposal to prevent surface runoff and stormwater discharge to the pretreatment system, and a proposal to measure soft water regenerate discharged to the sewer. On April 15, 2024, Color Fashion Dye and Finishing submitted the required compliance documents to OC San for review.

OC San will continue enforcement during the next reporting period and continue to monitor Color Fashion Dye and Finishing's discharge and compliance on a quarterly basis.

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

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

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

July 1 – December 31, 2023

CP-Carrillo had no violations during this reporting period.

January 1 – June 30, 2024

On May 15, 2024, CP-Carrillo exceeded the instantaneous and daily maximum discharge limits for O&G (mineral), for which a NOV was issued on June 5, 2024. On June 26, 2024, OC San conducted a compliance inspection to investigate the root cause of the exceedance, collect a resample, and review facility operations. During the inspection, CP-Carrillo attributed the exceedance to a recent change in their filter replacement schedule but was still in the process of its root cause investigation. CP-Carrillo will submit its corrective action report once its investigation has been completed.

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

Custom Pack (No Permit)

Custom Pack receives bulk coconut oil and repackages the oil in containers for retail sale to grocery stores. Custom Pack receives bulk coconut oil and repackages the oil at temperatures between 100 and 110°F into individual jars for retail sale. Production equipment and product lines are cleaned each time the type of coconut oil is changed from extra virgin to refined and vice versa. Equipment cleaning includes usage of heated water, Dawn dish soap, and bleach, as necessary, generating approximately 900 gallons during each cycle. Steam from the bottling processes is collected on the floor and is washed down the drain using hot water. Custom Pack does not employ any unit operations (i.e., clarifier, grease interceptor, etc.) to remove grease from the wastewater prior to discharge to the sewer.

July 1 – December 31, 2023

Custom Pack had no violations during this reporting period.

January 1 – June 30, 2024

As a result of sewer blockage caused by the discharge of oil and grease from Custom Pack, OC San issued an NOV March 14, 2024, requiring Custom Pack to submit a permit application and a proposal to cease the discharge of oil to the sewer. During a compliance inspection on April 9, 2024, it was noted that Custom Pack continued to discharge oily wastewater to the sewer using hot water and a pump. OC San also received information from the City of Garden Grove that the sewer line downstream of Custom Pack had another blockage on April 8, 2024. As a result of continued noncompliance and Custom Pack's failure to submit a Class I Wastewater Discharge application, OC San issued an order to terminate discharge on April 22, 2024, which was effective immediately. Follow-up inspections confirmed that Custom Pack had ceased operations and wastewater discharge to the sewer.

OC San will continue to monitor Custom Pack's wastewater discharge status as needed.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On April 3, 2024 a compliance inspection was conducted for the monthly lead limit violation observed in April 2023. During the inspection, the treatment systems appeared to be working appropriately with no noticeable malfunctions. DS staff indicated that its production levels and wastewater flow have remained the same over the past year. An immediate source of the violation could not be readily identified during the inspection.

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

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

Dr. Smoothie Enterprises – DBA Bevolution Group (Dr. Smoothie) processes, packages, and distributes fruit beverage concentrates. The operations performed include mixing of concentrates manufactured offsite, packaging, and distribution. Wastewater is generated from equipment washdowns and clean-in-place processes. Wastewater drains to a floor trench in the facility that eventually drains to a three-stage clarifier, where the wastewater is pH adjusted prior to discharge.

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

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

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

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

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

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

July 1 – December 31, 2023

On July 10, 2023, OC San conducted a compliance inspection at the facility. During the inspection, OC San reviewed the fixed final stage pH probe that was the root cause of the violation. OC San verified that the pH probe is functioning accurately. Dr. Smoothie has also implemented a daily, weekly, and monthly preventative maintenance schedule of its system to ensure that all components of the system are functional. On September 26, 2023, Dr. Smoothie had another pH violation, for which an NOV was issued on October 4, 2023. A root cause analysis and corrective action report was submitted on October 20, 2023, attributing the violation to failing to place the system back in automatic mode after system maintenance was performed

in manual mode. Dr. Smoothie has since performed a full verification of all the system valves and interlocks and did not observe any further issues.

As a result of a pH violation in May 2023, Dr. Smoothie replaced pH probe wiring and established a maintenance schedule for pH probes by a contracted vendor.

January 1 – June 30, 2024

Dr. Smoothie had no violations during this reporting period and has taken corrective actions to ensure long-term compliance. Therefore, no further enforcement is required at this time and this enforcement case is closed. In addition, Dr. Smoothie had a change of ownership and the permit will be voided during the next reporting period.

Dr. Squatch Bricc City (Permit No. 1-602045)

Dr. Squatch Bricc City (Dr. Squatch) manufactures cold processed bar soaps for personal hygiene. Bulk raw materials (oils, butters, clay, salt, and fragrances) are compounded and pre-mixed for production. Pre-blended materials are mixed with sodium hydroxide lye which raises the temperature. The soap mixture is poured into either small or large molds and allowed to cure prior to packaging and shipping offsite to the end user.

Wastewater is generated from the cleaning, washing, and rinsing of mold trays and conveyor belts. Wastewater is discharged to an underground clarifier and sample box prior to the sewer.

July 1 – December 31, 2023

Dr. Squatch had no violations during this reporting period.

January 1 – June 30, 2024

On May 15, 2024, Dr. Squatch exceeded the instantaneous and daily maximum discharge limits for O&G (mineral), for which an NOV was issued on June 5, 2024.

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

DS Services of America (Permit No. 1-021393)

DS Services of America (DS Services) is a water bottling facility for Sparkletts brand bottled water. The facility sources water from two on-site groundwater production wells as well as an off-site location in San Diego County. Groundwater is treated using sand filtration, carbon filtration, ultraviolet treatment, microfiltration, and reverse osmosis to become purified. Purified water may then be distilled through boiling. The facility fills 3-gallon and 5-gallon water bottles. Wastewater is generated from their daily cleaning and sanitizing of bottles, backwash, and reject from the filtration and reverse osmosis units, and from unusable drinking water from their water tank farm. Wastewater flows through a three-stage clarifier with a sample box prior to discharging to the sanitary sewer.

July 1 – December 31, 2023

During a permit renewal inspection on September 11, 2023, OC San observed that the drainage channels surrounding the tank farm that stores aquifer and spring water was uncovered. The drainage channels collect storm water and ultimately discharge to the sewer. This practice is in violation of DS Services' permit and OC San's Ordinance. An NOV was issued on November 29, 2023, requiring DS Services to provide a proposal to prevent the discharge of storm water and surface runoff to the sewer.

January 1 – June 30, 2024

On January 30, 2024, DS Services submitted a proposal in response to the NOV issued on November 29, 2023 to prevent the discharge of stormwater to the sewer.

On March 5, 2024, DS Services provided supplemental documentation to the proposal. DS Services proposed to cap the sewer line that has the capability of discharging stormwater to the sewer. A float switch activated self-priming pump would be installed at a low point in the drainage channels and plumbed to convey stormwater from the drainage channels to a stormwater drain located at the front of the property via a 2-inch above-ground PVC line. On June 17, 2024, OC San issued a compliance requirements letter accepting the proposal to prevent the discharge of stormwater to the sewer.

During quarterly sampling events on October 3, 2023 and December 3, 2023, OC San was unable to take a sample due to inadequate flow going through the sample point. The designated sample point is a sewer cleanout located on the south side of the facility. On both days, OC San observed a significant flow of wastewater coming into the underground clarifier, but little to no flow through the sample point. On February 28, 2024, OC San issued DS Services an NOV, with a requirement to provide a water balance report and a proposal to install a sample point representative of all industrial wastewater discharging to the sewer from their facility.

On April 30, 2024, DS Services submitted a proposal to use an existing manhole next to their water processing equipment as the new sample point. The manhole is downstream of the underground clarifier and receives all regulated industrial wastewater discharged from the facility. The proposal also pointed out that the existing sample point was used for a previous bottling line that is no longer on-site. OC San issued a compliance requirements letter on June 17, 2024, accepting DS Services' proposal.

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

El Toro Meat Shop (Permit No. 2-022654)

El Toro Meat Shop (El Toro) is a grocery store and taco restaurant. Wastewater is generated from food preparation activities. Wastewater passes through an underground clarifier prior to sewer discharge.

July 1 – December 31, 2023

El Toro Meat Shop had no violations during this reporting period.

January 1 – June 30, 2024

As a result of an OC San sampler being tampered with on March 15, 2023, OC San issued an NOV to El Toro, requiring it to provide a proposal to OC San to identify an area where the sampler can be secured for the sampler or an alternate sample location. El Toro submitted a proposal on June 21, 2024 stating that they would provide a security guard to protect the sampler during sampling. The proposal is under OC San review.

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

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

Electrode Technologies, Inc. dba Reid Metal Finishing (RMF), formerly listed as Reid Metal Finishing, is a metal finisher providing chromic anodizing, passivation, hard anodizing, sulfuric anodizing, chem film, and plating services of stainless steel, aluminum, copper, brass, bronze, and zinc die castings. RMF processes products for the aerospace, military, medical, and commercial industries. Wastewater is generated from the rinses used in the various surface finish processes and air scrubber wash water. RMF's pretreatment system consists of chrome reduction, cyanide destruction, hydroxide precipitation and sludge filtration.

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

discharge limit violations as a result of inadequate treatment. RMF has failed to address this issue and implement a solution to maintain compliance with discharge limits.

July 1 – December 31, 2023

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

On July 27, 2023, OC San conducted a compliance inspection in response to the April and May 2023 cadmium violations. RMF informed OC San certain floor wastes in the area of cadmium processing had been and continue to flow to the continuous pretreatment system. OC San noted that concentrated floor wastes have the potential to cause slug discharges if automatically pumped to the continuous treatment system. OC San indicated RMF should characterize the concentration and volume of all floor wastes and that this information would be presented in the revised pretreatment system modification proposal. RMF inquired if the proposed tank size increase would be acceptable. OC San noted that while the increased tank size would increase retention time, the additional capacity does not effectively address non-compliance caused by concentrated floor wastes.

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

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

January 1 – June 30, 2024

In May 2024, RMF exceeded the monthly average discharge limit for cadmium, for which an NOV will be issued in the following reporting period. OC San continues to review RMF's proposal.

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

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On November 21, 2023, Embee had a cyanide daily maximum discharge limit exceedance for which an NOV was issued on January 16, 2024. On February 5, 2024, OC San issued Embee an NOV for the November 2023 cyanide monthly average discharge limit exceedance.

On February 14, 2024, OC San conducted a compliance inspection to investigate the source of the cyanide. Embee staff indicated that the cyanide destruction treatment system was functioning properly, and a direct cause of the cyanide exceedance could not be determined. Embee staff noted that the on-site spectrophotometer has not been calibrated, and was in the process of having it re-calibrated by a certified third-party provider. Moving forward, Embee stated that they will test every treated batch from the cyanide treatment system prior to discharge using the spectrophotometer. Embee also acknowledged that the cyanide exceedance could have been operator error during the cyanide batch treatment process.

Embee had no violations during this reporting period.

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

Excello Circuits, Inc. (Hunter) (Permit No. 1-601356)

Excello Circuits, Inc. (Excello Circuits) manufactures printed circuit boards. Operations include image printing, developing, plating, stripping, lamination, solder-masking, and silk-screening. Excello Circuits discharges wastewater to a batch treatment system for pH adjustment, metals precipitation, sedimentation, and filtration. Excello Circuits maintains an atomic absorption spectrometer to verify treatment prior to discharge.

July 1, 2023 – December 31, 2023

Excello Circuits had no violations during the reporting period.

January 1, 2024 – June 30, 2024

On January 31, 2024, Excello Circuits exceeded the instantaneous discharge limit for sulfide, for which an NOV was issued on March 11, 2024.

On April 18, 2024, OC San conducted a compliance inspection. Excello Circuits attributed the exceedance to operator error. Excello Circuits stated waste treatment personnel had overdosed the pretreatment system with a precipitant comprised of sodium hydrosulfide, which resulted in sulfide discharged in excess of permitted discharge limits.

On April 10, 2024, Excello Circuits again exceeded the instantaneous discharge limit for sulfide, for which an NOV was issued June 5, 2024. On June 25, 2024, OC San issued a compliance requirement letter that required Excello Circuits to submit a corrective action report to ensure long-term compliance with sulfide permitted discharge limits.

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

Fullerton Custom Works (No Permit. Z-331424)

Fullerton Custom Works is a job shop that conducts plating for the following finishes: chrome, nickel, and copper. The facility plates a variety of parts such as automotive, furniture, and decorative items. Fullerton Custom Works does not manufacture parts; they receive and prepare parts for the plating line.

July 1 – December 31, 2023

On November 6, 2023, OC San issued an NOV for failure to submit a zero discharge certification renewal application. On November 1, 2023, OC San received the zero discharge certification renewal application, which was then processed for certification issuance. Fullerton Custom Works had no further violations during this reporting period. Therefore, no further enforcement is required at this time and this enforcement case is closed.

January 1 – June 30, 2024

Fullerton Custom Works had no violations during this reporting period.

OC San will continue to monitor Fullerton Custom Works' 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 with water and abrasive powder in large circular chambers to final customer specifications. Some transparencies are layered with various abrasive-resistant and/or optical coatings.

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 12, 2024, GKN submitted the summary report of the pilot study for solids removal. The pilot summary report provided data indicating successful removal of suspended solids in their wastewater to prevent future blockage in the sewer using vacuum drum technology with no chemical pretreatment.

On February 15, 2024, GKN submitted conceptual plans for the full treatment system for OC San's review and acceptance. GKN intends to submit the full design plans within 60-days of OC San's acceptance of the conceptual plans.

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

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

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

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

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

In 2023, after Gold Coast Baking and additional violations and failed to complete compliance requirements, OC San issued an NOV requiring Gold Coast Baking to attend a compliance meeting. During the compliance meeting in June 2023, Gold Coast Baking noted that the original consultant was no longer available and that Gold Coast Baking had increased production recently. OC San reminded Gold Coast Baking of their requirement to maintain compliance with the permit conditions and discharge limits at all times.

July 1 – December 31, 2023

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

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

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

January 1 – June 30, 2024

On January 22 and 23, 2024, Gold Coast Baking had pH violations, for which an NOV was issued on February 12, 2024. On February 20, 2024, Gold Coast Baking had another pH violation, for which an NOV was issued on February 28, 2024. On April 1, 2024, Gold Coast Baking had another pH violation, for which an NOV was issued on April 10, 2024.

On May 1, 2024, OC San conducted a permit inspection, during which it became known that Gold Coast baking had underwent a change of ownership in September of 2022. As a result, OC San issued a new Class 1 Wastewater Discharge Permit No. 1-602258 to Gold Coast Baking Company, LLC on June 1, 2024.

On June 24, 2024, OC San issued Gold Coast Baking an NOV for failing to inform of a sale or change in ownership.

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

Goodwin Company (Permit No. 1-031043)

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

July 1 – December 31, 2023

On December 5, 2023, Goodwin had an O&G min violation, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2024

On February 2, 2024, OC San issued an NOV for the December 2023 O&G exceedance which occurred during the previous reporting period. A root cause analysis and corrective action report was requested to be submitted by February 29, 2024. On May 7, 2024, Goodwin exceeded the instantaneous, daily maximum, and loading daily maximum discharge limits for O&G-min. for which an NOV was issued on June 5, 2024.

OC San will continue enforcement during the next reporting period and 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. Graphic Packaging discharges wastewater intermittently from the glue pot cleaning area, plating room, fountain solution under presses, and wash water from sinks when presses are being cleaned. Wastewater is primarily generated from water used to rinse baking compounds from lithologic plates, water used to wash and rinse glue pots with citrus-based cleaner, and water used at each printing press. Graphic Packaging also has a chiller, soft water and reverse osmosis systems that generate wastewater. Wastewater from the glue room, plating room, and fountain solutions are pH adjusted and monitored prior to discharge to the sewer.

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 2, 2024, OC San conducted an inspection and collected a 30-day resample, which demonstrated compliance with pH limits.

On January 9, 2024, Graphic Packaging submitted a corrective action report, attributing the exceedance to the discharge of fountain solution from a printing press while performing routine preventative maintenance. Under normal conditions, a procedure is followed by designated facility personnel to neutralize the pH of the fountain solution wastewater by adding a pH conditioner prior to discharge. Graphic Packaging reported that facility personnel performing the preventative maintenance at the time did not account for one of the two fountain solution tanks in their wastewater discharge procedure. In addition, the designated employee responsible for this maintenance task was not present at the facility the day of the exceedance. To prevent future exceedances, Graphic Packaging reported that the wastewater discharge procedure was modified to include the second fountain solution tank and all printing department facility personnel were trained on the new wastewater discharge procedure. Graphic Packaging also collected a pH grab sample to demonstrate compliance with the pH limits.

On May 28, 2024, Graphic Packaging had a subsequent pH violation, for which an NOV was issued on June 18, 2024.

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

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

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

July 1 – December 31, 2023

On July 12, 2023, Harbor Truck had an instantaneous and daily maximum violation of molybdenum, for which an NOV was issued on July 25, 2023. On August 21, 2023, OC San performed a compliance inspection to investigate the root cause of these molybdenum violations, collect a resample, and review facility operations. During the inspection, Harbor Truck attributed these violations to using a new phosphate solution (Hotsy Phosphatizer No. 2) for surface washing and phosphate conversion coating spray treatment. According to Harbor Truck, the Safety Data Sheet for the new phosphate solution identified sodium molybdate dihydrate as a base material of the new phosphate solution, which is a source of molybdenum. On August 22, 2023, Harbor Truck submitted their corrective action report, which included replacement of the new molybdenum-based phosphate solution with a non-molybdenum-based solution (Secure Steam FRP) and procuring a contractor to pump out the clarifier of residual solids. Results from the resample showed an instantaneous and daily maximum limit violation of molybdenum for which an NOV was issued on September 11, 2023. On August 8, 2023, Harbor Truck had instantaneous and daily maximum discharge limit violations for molybdenum, for which an NOV was issued on September 12, 2023. Harbor Truck attributed these subsequent violations to residual molybdenum within the clarifier due to prior use of the new molybdenum-based phosphate solution.

Following implementation of the corrective actions, Harbor Truck had no further violations during the reporting period.

January 1 – June 30, 2024

Harbor Truck had no violations during this reporting period and subsequent sampling has demonstrated compliance with permit and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

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

July 1 – December 31, 2023

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

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

OC San is drafting a compliance requirements letter, accepting the corrective actions and requiring the submittal of an updated operation and maintenance manual.

January 1 – June 30, 2024

On January 4, 2024, OC San issued a compliance requirements letter, accepting Hightower's corrective actions as described in the previous reporting period. The compliance requirements letter also required Hightower to submit an updated operation and maintenance manual.

HighTower had no violations during this report period.

OC San will follow up on the submittal of the operations and maintenance manual and will continue to monitor Hightower's discharge and compliance status on a quarterly basis.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 16, 2024, Howmet submitted a corrective action report, stating that a cause of the cyanide exceedance could not be readily identified after a review of all treatment and operating systems. However, as a corrective action, Howmet has increased the pH set point to 10.5 to optimize cyanide destruction. As a result of this sample study, Howmet is no longer pursuing the installation of an IX system after the cyanide destruction tanks.

On June 19, 2024, Howmet exceed the daily maximum discharge limit for molybdenum, for which an NOV will be issued during the next reporting period. This daily maximum discharge limit exceedance also resulted in a monthly average discharge limit exceedance, for which an NOV will be issued during the next reporting period.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On June 1, 2024 OC San issued a Class 1 Wastewater Discharge Permit to HSH Interplan USA.

Therefore, since a permit has been issued and there were no violations during the reporting period, no further action is required at this time and this enforcement case is closed.

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

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

J&J Marine Acquisitions, LLC (J&J Marine) performs boat maintenance and repair work, including hull repairs and recoating, plus interior remodeling. J&J Marine also has the capability to collect and store stormwater throughout the facility (rather than discharging to the Newport Beach Harbor) and reuse it in the boat washing and cleaning process. This wastewater is then treated and discharged to the sewer. Stormwater that is not captured for reuse is also treated and discharged to the Newport Beach Harbor.

July 1 – December 31, 2023

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

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

J&J Marine had no further violations during this reporting period.

January 1 – June 30, 2024

J&J Marine had no violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

Kinsbursky Brothers Supply, Inc. (Permit No. 1-021424)

Kinsbursky Brothers Supply, Inc. (KBI) reclaims batteries and catalytic converters. Wastewater generated from the reclamation process is sent to a batch treatment system for pH adjustment, precipitation, and filtration.

July 1, 2023 – December 31, 2023

KBI had no violations during the reporting period.

January 1, 2024 – June 30, 2024

On March 8, 2024, KBI exceeded the instantaneous and daily maximum discharge limits for cadmium, for which an NOV was issued on April 10, 2024. On April 25, 2024, OC San conducted a compliance inspection to determine the source of the cadmium exceedances. KBI attributed the exceedances to facility operations. Specifically, KBI determined facility personnel drained lead-acid battery electrolyte that contained cadmium. While KBI identified the cause for the exceedance, a corrective action was not determined.

On June 24, 2024, OC San issued a compliance requirements letter, requiring KBI to submit a corrective action report by July 31, 2024.

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

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

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

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

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

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

July 1 – December 31, 2023

As a result of continued noncompliance and failure to provide a system to ensure long term compliance, OC San issued a compliance requirements letter on December 5, 2023, directing Koia to attend a compliance meeting on December 19, 2023. During the compliance meeting, Koia and OC San discussed pretreatment and the facility's recent proposals for adequate pH adjustment. While Koia has proposed to increase hydraulic capacity and retention, operating parameters specific to peak flowrate and facility discharge remain unclear, thus impacting design assessment and review. OC San has drafted a compliance meeting summary and requirements letter that will be issued in the next reporting period.

January 1 – June 30, 2024

On January 16, 2024, OC San issued a compliance requirements letter that required Koia to address prior deficiencies and resubmit a pretreatment system proposal.

Between February and June 2024, Koia submitted multiple proposals for adequate pH adjustment. However, OC San rejected each proposal as Koia failed to adhere to all enforcement criteria established by OC San. Moreover, submittals lacked referenced attachments and figures, and the proposed compliance sample point created an opportunity for bypass.

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

La Habra Bakery (Permit No. 1-031029)

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

July 1 – December 31, 2023

On October 26, 2023, La Habra Bakery had a pH violation for which an NOV was issued on November 9, 2023. On November 22, 2023, OC San conducted a compliance inspection to investigate the root cause of the violation, collect a resample to verify compliance, and review facility operations. During the inspection,

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

January 1 – June 30, 2024

La Habra Bakery had no violations during this reporting period. Based on the changes La Habra Bakery made (weekly checks of the sodium hydroxide supply and obtaining a new sodium hydroxide supplier) and the compliant pH samples since the November 2023 resample, no further action is required at this time, and this enforcement case is closed.

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

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

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

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

Between March 2021 and May 2023, Linco had multiple cyanide and heavy metal violations. As corrective actions, Linco updated facility records and manuals, instituted regular pretreatment system maintenance, and proposed several pretreatment methodologies to ensure long-term compliance. However, after thorough review, OC San had rejected each proposal as waste characterization was incomplete, technical specifications concerning treatment were omitted, and it was unclear if Linco had adequately sourced and segregated cyanide-bearing wastestreams.

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

July 1 – December 31, 2023

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

On August 3, 2023, Linco had daily average cadmium and cyanide violations for which an NOV was issued on September 19, 2023. On September 21, 2023, OC San conducted a compliance inspection to investigate recent heavy metal and cyanide violations, at which time, Linco attributed the violations to a tear in the facility's filter press filter cloth. Separately, Linco indicated personnel have experienced difficulty maintaining prescribed treatment parameters. While Linco reported facility personnel had repaired the filter press, there are several concerns with Linco's pretreatment. Specifically, waste characterization used to formulate pretreatment chemistry may not accurately demonstrate the extent of pollutant contamination in the facility's wastestreams, and a variance in treatment parameters may result in incomplete or inadequate treatment. As a result, OC San has drafted a compliance requirements letter that directs Linco to attend a compliance meeting that will be issued in the next reporting period.

On September 22, 2023, Linco had a daily average cyanide violation for which an NOV was issued on October 20, 2023. On October 17, 2023, Linco had instantaneous and daily average cyanide violations for which an NOV was issued November 21, 2023. On November 2, 2023, OC San issued an NOV for August's

monthly average cyanide and cadmium violations. On December 6, 2023, OC San issued an NOV for September's monthly average cyanide violation. In October 2023, Linco had a monthly average cyanide violation for which an NOV will be issued in the next reporting period.

January 1 – June 30, 2024

On January 11, 2024, OC San issued an NOV for the October 2023 cyanide monthly average discharge limit exceedance. On December 12, 2023, Linco had a cyanide daily maximum discharge limit exceedance for which an NOV was issued on February 28, 2024. On March 4, 2024, OC San issued an NOV for the December 2023 cyanide monthly average discharge limit exceedance. Also on March 4, 2024, OC San issued a compliance requirements letter that directed Linco to attend a compliance meeting on March 19, 2024.

On March 6, 2024, OC San conducted a compliance inspection at Linco to discuss recent non-compliances and facility pretreatment. At the time of inspection, Linco reported the facility has made repeated efforts to improve/manage pretreatment and attain long-term compliance. Despite pretreatment updates, cyanide treatment issues continue. During a compliance meeting on March 19, 2024, OC San and Linco discussed several deficiencies concerning Linco's waste management practices, which include incomplete waste characterization and inconsistent wastewater pretreatment. Based on the time required for Linco to achieve continuous compliance, OC San has drafted an ECSA.

On May 23, 2024, Linco exceeded the instantaneous discharge limit for cyanide, for which an NOV will be issued in the next reporting period. This exceedance also caused a monthly average discharge limit exceedance for cyanide, for which an NOV will be issued during the next reporting period. On June 18, 2024, Linco exceeded the daily maximum discharge limit for cadmium, for which an NOV will be issued in the next reporting period.

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

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

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

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

July 1 – December 31, 2023

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

On September 8, 2023, Markland sent OC San a document titled "Closure Plan for Fixed Treatment Units" (Closure Plan) dated June 23, 2023. This Closure Plan was drafted for and submitted to the Orange County

Health Care Agency (OCHCA) and did not contain the information required in the Site Closure Plan requested by OC San in the letter dated September 7, 2023. On October 9, 2023, OC San issued an NOV for failure to comply with the requirements issued in the NOV from September 7, 2023. The NOV required Markland to submit the Site Closure Plan as specified in the September 7, 2023 NOV, no later than October 18, 2023. OC San also required Markland to attend a compliance meeting on October 18, 2023.

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

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

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

January 1 – June 30, 2024

Markland ceased operations and wastewater discharge at this site during the previous reporting period. No further action is required at this time, and this enforcement case is closed.

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 17, 2024, McKenna had a pH violation, for which an NOV was issued on February 28, 2024. On March 29, 2024, McKenna submitted a root cause analysis and corrective action report in which McKenna attributed the pH violation to an error in collecting the rinse of an acidic residual during a coil cleaning operation that is not part of their routine operation or discharge. As a corrective action, McKenna retrained their operators on the handling of hazardous materials.

McKenna had no further violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

Meggitt Orange County (Permit No. 1-601843)

Meggitt Orange County (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 sliver nitrate solution from the ceramic tumbling is wastehauled offsite. Rinses from these and the other wastewater-generating operations discharge to a three-stage polypropylene aboveground tank, in which sodium hydroxide is added in the first and third compartments for pH adjustment, as most of the wastewater streams are acidic in nature. The neutralized effluent is collected in a 750-gallon holding tank to facilitate batch discharge sampling.

July 1 – December 31, 2023

Meggitt had no violations during this reporting period.

January 1 – June 30, 2024

In January 2024, Meggitt exceeded the lead monthly average discharge limit, for which an NOV was issued on April 1, 2024. On March 5, 2024, Meggitt exceeded the daily maximum discharge limit for lead, for which an NOV was issued on March 20, 2024. This exceedance caused a monthly average discharge limit exceedance for lead, for which an NOV was issued on June 6, 2024. On April 10, 2024, OC San conducted a compliance inspection to investigate the root cause of the lead exceedances and review facility operations. During the inspection, Meggitt attributed these violations to human errors in their cleaning procedures. According to Meggitt, a new ceramic polishing operator failed to properly wipe down process containers prior to the final rinse step, which resulted in excess lead residue discharged to the sink. In addition, Meggitt identified that an operator inadvertently discharged a small amount of stannous chloride to the sink during the March 2024 sampling event. Stannous chloride is used by Meggitt as a parts cleaner and is normally contained and wastehauled offsite following cleaning. Meggitt described the release of stannous chloride to the sink from this event as a misunderstanding by the operator and not in accordance with standard operating procedures for the facility.

On April 23, 2024, Meggitt submitted a corrective action report which identified improvements which included training of employees on facility cleaning and waste handling procedures, residue awareness training, and identifying and evaluating lead-bearing wastewaters to be waste hauled offsite versus batch treatment and discharge. Resample results showed compliant lead concentrations.

Meggitt had no further violations during the reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

Merical, LLC (Orange) (Permit No. 1-600655)

Merical, LLC (Orange) (Merical) is a manufacturer of solid dosage nutritional supplements, tablets, hard shell gelatin capsules, protein powders, drink mixes containing vitamins, minerals, and herbal supplements. Merical also packages powders in pouches, packets, and stick packs. Raw materials in powder form are mixed in a vessel that is washed after formulation. That wastewater is collected in a catch basin and drained to the treatment system sump. Contents in the collection sump are pumped into a reaction tank where a flocculant is added to a reaction tank and mixed to allow any solids washed down from process equipment to settle. The wastewater is then pumped through the filter press to remove solids and the filtrate then passes through a three-stage below ground clarifier before discharging to the sewer.

After a zinc violation in March 2023 and subsequent compliance inspection, a compliance letter was issued to Merical, requiring submission of a proposal for effective treatment of zinc. Merical was required to submit the proposal in July 2023.

July 1, 2023 – December 31, 2023

On July 14, 2023, Merical provided a corrective action report to OC San documenting the corrective actions for preventative maintenance to remove solids that may have built up in the system that were taken to address any system deficiencies that caused the violation.

OC San required the submittal of an updated operation and maintenance manual and accepted the corrective actions on December 18, 2023.

January 1 – June 30, 2024

On March 6, 2024, Merical exceeded the instantaneous and daily maximum discharge limits for copper and zinc, for which an NOV was issued March 19, 2024.

On April 16, 2024, OC San conducted a compliance inspection to determine the source of the copper and zinc exceedances. During the inspection, Merical stated that they had a change in one of their zinc and copper containing products which caused the powder to stick to the blender. Merical stated that they typically are able to tap the blenders with a rubber mallet to get the bulk of the product out before rinsing but this newer product presented more solids in the rinse.

Merical noted that zinc and copper are routinely used in the supplements such as multivitamins that the facility prepares. Since receiving the NOV, Merical has started jar testing their current flocculant and has determined it is not appropriate for zinc and are looking for a different product. Merical is also working with a consultant to consider additional treatment options. OC San staff requested a letter from Merical stating the corrective actions that were taken to address any system deficiencies that caused the violation due by May 16, 2024.

On May 16, 2024, Merical submitted a corrective action report in which Merical responded to the items that were discussed during the compliance inspection.

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

MeriCal, LLC (Anaheim) (Permit No. 1-602025)

MeriCal, LLC (Anaheim) (MeriCal) manufactures and packages nutritional supplements including pectin gummies and tablets. Wastewater is generated from product condensate, clean-in-place operations, and equipment rinses which discharges to a multistage clarifier then to sewer.

July 1, 2023 – December 31, 2023

Merical had no violations during this reporting period.

January 1 – June 30, 2024

On March 19, 2024, MeriCal exceeded the instantaneous and daily maximum discharge limits for O&G (mineral), for which an NOV was issued May 6, 2024.

On June 11, 2024, OC San conducted a compliance inspection, at which time MeriCal was unable to identify the cause for the oil and grease violations and a corrective action was not determined. OC San has drafted a compliance requirements letter that requires MeriCal to submit a corrective action report to ensure long-term compliance.

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

Micrometals had a daily mass limit exceedance for lead on June 23, 2023, for which an NOV will be issued in the following reporting period.

July 1, 2023 – December 31, 2023

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

January 1 – June 30, 2024

OC San continues to review corrective actions submitted by Micrometals and confirm that Best Available Technology is required due to federal categorization as a metal finisher.

OC San will continue enforcement during the next reporting period and 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 portable toilets and restroom trailers under a covered wash-pad. Wastewater flows to a pH adjustment system which leads to a three-stage underground clarifier prior to discharge to the sewer.

July 1 – December 31, 2023

National Construction had no violations during this reporting period.

January 1 – June 30, 2024

On April 2 and 3, 2024 OC San staff conducted routine inspection and sampling activities at National. On April 3, 2024, OC San observed one of National's wastehauling trucks strike the composite wastewater sampler, knocking the sampler over, causing the collected wastewater to spill to the ground. OC San placed precautionary cones surrounding the composite sampler to provide better visibility to National's wastehauler trucks which frequently drive through the parking lot.

On June 24, 2024, OC San issued National an NOV for failing to provide adequate monitoring facilities. OC San required National to submit a proposal by June 31, 2024, to identify an area that ensures the composite sampler can be secured during sampling activities. OC San will review the proposal upon receipt in the following reporting period.

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

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

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

July 1 – December 31, 2023

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

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

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

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

Omni had no further violations during this reporting period. No further action is required at this time, and this enforcement case is closed.

January 1 – June 30, 2024

Omni had no violations during this reporting period.

OC San will continue to monitor Omni's compliance status on a quarterly basis.

Only Cremations and Aquamation for Pets (Stanton) (Permit No. 1-601085)

Only Cremations for Pets offers crematory and aquamation services to owners of recently deceased pets. Aquamation uses an alkaline solution at an elevated temperature to convert tissue into an aqueous solution suitable for discharge. The leftover mineral remains (calcium phosphate – bones and teeth) are separated from the solution and crushed into powder/ash then returned to the owner or disposed at sea. Batch treatment includes pH adjustment and filtration prior to final discharge to sewer.

In addition to the above, Only Cremations for Pets receives and transports medical waste. The facility does not treat or dispose of the medical waste onsite.

July 1 – December 31, 2023

Only Cremation for Pets had no violations during this reporting period.

January 1 – June 30, 2024

On June 1, 2024, OC San issued an Order to Terminate Discharge Without a Valid Permit, as OC San did not receive Only Cremation's permit renewal application prior to the permit expiration date of May 31, 2024.

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 30, 2024, Pacific Image Technology proposed to modify its industrial wastewater discharge such that wastewater from only the facility's developer, the photopolymer resist strip rinse tank, and the clarifier will discharge to the sample point and sewer. However, based on a review of waste characterization submitted with the proposal, OC San noted that wastewater generated from the photopolymer resist strip rinse tank and the clarifier both contain low concentrations of heavy metals, including copper and nickel. While the continued discharge of metal-bearing wastewater without BAT would require prior enforcement action established by OC San, it is unclear if the heavy metals present in both tanks originate from intake water supplied to the facility or result from industrial processes.

On June 24, 2024, OC San issued a compliance requirements letter that required Pacific Image Technology to conduct further waste characterization analysis to demonstrate the facility's proposal satisfies permit and enforcement criteria.

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

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

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

In a response to a violation for the 4-methylphenol monthly average discharge limit from November 2022, Patriot noted the increased 4-methylphenol concentration was likely from a landfill leachate waste profile. Patriot will continue to perform additional in-house analytical testing for concentration verification, and instituted protocols to perform additional and voluntary sampling if needed for a particular constituent which may be above the monthly average discharge limit.

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On January 4, 2024, OC San performed a compliance inspection and 30-day resample activities at Patriot. Patriot noted that a review of the incoming load/discharge logs show a potential source of the exceedances to be leachate from the Chiquita Canyon Landfill. Patriot contacted Chiquita Canyon and inquired about any recent changes in the leachate load profile. Because of the violations, Patriot implemented corrective measures, such as increasing the replacement frequency for the bag filter cartridges. Patriot also modified the number of organoclay and carbon vessels from one organoclay and two carbon to three carbon (all operating in series). For 4-methylphenol specifically, the corrective action is to reduce the flowrate through the carbon to increase the contact time and removal efficiency.

On January 5, 2024, Patriot exceeded the daily maximum discharge limit for arsenic, for which an NOV was issued on February 8, 2024. On January 19, 2024, Patriot exceeded the daily maximum discharge limit for 4-methylphenol, for which an NOV was issued on January 31, 2024. This also caused an exceedance of the 4-methylphenol monthly average discharge limit for January 2024, for which an NOV was issued on April 2, 2024. On February 5, 2024, OC San issued an NOV for the November 2023 4-methylphenol monthly average discharge limit exceedance.

On January 16 and 17, 2024, several odor complaints were made to the City of Orange in the area of Patriot's facility. On January 16, 2024, City of Orange staff investigated the odor complaint and noted an impact in the local sewer line downstream of Patriot's facility. All other local sewer lines in the area appeared to be flowing as normal. City of Orange Staff cleared the sewer line and noted a brown, thick, muddy material with a strong chemical odor. The local sewer line was jetted, and the sewer returned to a normal flowrate. On January 17, 2024, City of Orange staff returned to the sewer line and again observed that the sewer was impacted with the same brown, thick, muddy material. The sewer line was again jetted and returned to a normal flowrate. Patriot noted to the City of Orange staff that the discharge was a "landfill slurry", and noted to OC San that the odor may be from either leachate from the Chiquita Canyon Landfill, or from "egg wash water" received by Patriot which is treated and discharged to the Sewer. OC San investigated the area surrounding the odor complaint origin and determined no other facilities which may have caused the sewer odor. Based on the information gathered during the inspections, observations from the City of Orange, and conversations with both Patriot and the City of Orange, OC San issued an NOV on February 26, 2024, for violations of OC San's Ordinance regarding discharging wastewater which produces

noxious or malodorous liquids and causes a public nuisance. OC San required Patriot to conduct an investigation to determine the source of the strong odors, submit recent intake and release logs, and submit a proposal to eliminate/mitigate odors that result from the discharge of industrial wastewater.

In a Unilateral Administrative Order (UAO) issued February 21, 2024, by the Environmental Protection Agency (EPA) to Chiquita Canyon Landfill, LLC (CCL), it was noted that due to a subsurface chemical reaction, landfill leachate emanating from the "reaction area" contained concentrations of chemicals at or above hazardous waste levels including, but not limited to benzene. The UAO noted that CCL sent Patriot multiple loads of leachate (between January 23 and 25, 2024, and on February 5 and 8, 2024) which contained concentrations of benzene at or above 0.5 mg/L, the hazardous waste level for benzene. CCL had notified Patriot of this information on multiple occasions; however, this information was not conveyed to OC San. On February 28, 2024, OC San issued an NOV for failing to comply with permit special conditions and failing to notify OC San of significant process changes. Specifically, the NOV noted violations including accepting hazardous waste when Patriot is not a licensed hazardous waste treatment, storage, and disposal facility and for failing to notify OC San of significant process changes related to receipt of correspondence about hazardous waste from CCL. OC San required Patriot to verify all leachate from CCL as nonhazardous through confirmatory laboratory data, and to submit all previous correspondence with CCL regarding leachate and condensate and submit any future correspondence within 24-hours of receipt.

On March 5, 2024, OC San issued an NOV for the December 2023 4-methylphenol monthly average discharge limit exceedance. On March 13, 2024, Patriot exceeded the daily maximum discharge limit for antimony, for which an NOV was issued on April 10, 2024.

On March 27, 2024, OC San issued another NOV for failing to comply with permit special conditions. In this notice, OC San reiterated the information presented in the EPA UAO dated February 21, 2024. On February 21, 2024, CCL sent Patriot approximately 100,000-gallons of leachate with concentrations of benzene at 0.5 mg/L which is considered hazardous. Patriot's permit conditions prohibit the receipt, treatment, and discharge of hazardous waste. OC San also noted that the profile and laboratory analytical data for leachate and condensate on file were dated 2016, which meant that Patriot had failed to resubmit this profile for OC San's review during subsequent permit renewal cycles, and Patriot had also failed to submit recent analytical data for review and acceptance upon obtaining updated information. OC San required Patriot to submit updated laboratory analytical data for recurring waste profiles still being received in which the on-file laboratory data is more than two-years old.

On April 18, 2024, OC San conducted a compliance inspection and 30-day resample activities at Patriot in response to the antimony violation which occurred on March 13, 2024. Patriot noted one waste generator they believed could be the likely source for the antimony exceedance. Patriot presented OC San the waste tracking documentation for March 9, 11, 12, 23, and 14, 2024 to OC San upon request. Upon review, the intake logs confirmed Patriot received a load from the generator in question on March 11, 2024; however, the release forms indicated that this load was not discharged until March 22, 2024. Therefore, this generator and load received could not have caused the March 13, 2024 antimony exceedance. Patriot could not identify other potential sources at that time without further internal review. During this review process, OC San noted that the only link between the Intake Logs and Release Forms is the tank number (and corresponding waste volume) in which the wastewater is transferred to when offloaded. It was determined that there is insufficient information linking the intake and release forms such as the truck intake control number (an internal identification number generated by Patriot), waste manifest number, generator name, or waste type. OC San informed Patriot that the release forms should include additional information to provide better traceability between when a load is received and discharged. OC San also noted several instances on both intake forms and release logs where white-out was used. When OC San asked about the use of white out on the forms, Patriot responded that they used white out to cover incorrectly transcribed information in ink.

On June 21, 2024, OC San determined that Patriot underwent a change in ownership in August of 2022, and Patriot failed to notify OC San about the ownership change. On June 25, 2024, OC San issued a compliance requirement letter documenting the April 18, 2024 compliance inspection and required Patriot to submit new tank release forms by July 15, 2024, which must include additional information including, but not limited to, the waste manifest number and generator name to easily trace the receipt, treatment, and

discharge of each load and link information to the truck intake logs. OC San also required Patriot to immediately cease using white-out to conceal incorrectly transcribed information on all records utilized to document wastewater received, profiled, treated, and discharged to OC San's Sewerage Facilities.

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

Patriot Wastewater, LLC (Freedom Non-CWT) (Permit No. 1-600147)

Patriot Wastewater, LLC (Patriot) is a centralized wastewater treatment (CWT) facility that accepts and treats non-hazardous waste from off-site generators. Patriot treats both CWT and Non-CWT wastewater (as defined in 40 CFR 437.2), under separate permits and discharge points. Patriot's Non-CWT facility receives wastewater that is not regulated by CWT standards including, but not limited to, stormwater, food waste, demineralization water, etc. Wastewater is pH adjusted and pumped through bag filters before discharge to the sewer.

July 1 – December 31, 2023

Patriot had no violations during this reporting period.

January 1 – June 30, 2024

On June 21, 2024, OC San determined that Patriot underwent a change in ownership in August of 2022, and Patriot had failed to notify OC San about the ownership change.

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

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

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

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

July 1, 2023 – December 31, 2023

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

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

January 1 – June 30, 2024

In April 2024, Performance Powder exceeded the monthly average discharge limit for zinc, for which an NOV will be issued during the next reporting period. In May 2024, Performance Powder exceeded the monthly average discharge limit for zinc, for which an NOV will be issued during the next reporting period.

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

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

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

July 1, 2023 – December 31, 2023

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

OC San will issue an NOV for the lead monthly average discharge limit violation for October 2023 during the next reporting period.

January 1 – June 30, 2024

On January 2, 2024, OC San issued an NOV for the October 2023 lead monthly average discharge limit exceedance.

Pioneer had no violations during the reporting period. Therefore, based on Pioneer's replacement of the valves and reduction of lead buildup, no further action is required at this time, and this enforcement case is closed.

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

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

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

July 1, 2023 – December 31, 2023

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

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

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

January 1 – June 30, 2024

PDI's permit was voided during the previous reporting period. No further action is required at this time.

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

PowerDrive Oil & Gas Company, LLC (2nd) (Powerdrive) is an oil extraction company. A mixture of crude oil and brine water are pumped from the ground through nine wells to a wash tank where the oil and water are allowed to separate. The separated crude oil is decanted from the top of the wash tank to an oil storage tank, and the water gravity flows through a process flow meter and a three-stage clarifier before discharging to the sewer.

July 1 – December 31, 2023

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

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

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

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

January 1 – June 30, 2024

On April 4, 2024, OC San issued an NOV to Patriot for failing to comply to the compliance requirements listed in the NOV issued on December 6, 2023.

On May 20, 2024, PowerDrive responded with drawings and the determination that there was a blockage in the sewer line that caused an overflow of crude oil to the neighboring residence. However, Powerdrive's documentation (including drawings) was not responsive and failed to explain how crude oil was discharged from its facility to the sewer and neighboring residence.

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

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

Prima-Tex Industries Inc. (Prima-Tex) performs rotary screen printing of fabrics. Water-based inks are applied to fabric by means of perforated print design screens using one of two rotary printers. The facility also has two Sanforizing machines (a method of stretching, shrinking, and fixing the woven cloth in both length and width, before cutting to reduce the shrinkage which would otherwise occur after washing), two drying machines to dry printed cloth, a sanding machine (used to break some of the small fibers on the exterior of the material which teases them out to produce a soft feel), a crinkling machine (to artificially wrinkle the cloth), and two industrial washing and drying machines, used to test the fabric quality when the cloth is supplied by the customer. Wastewater discharges to an outside sump, before being pumped through a lint removal unit. The pump delivers wastewater to the inside of a rotating drum constructed of screen material. The lint is trapped on the inside, while wastewater passes through the screen and is discharged to a three-stage underground clarifier with sample box. A timed spray rinse above the drum cleans the outside of debris, which falls to a screen located directly below the drum.

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On February 8, 2024, Prima-Tex exceeded the instantaneous and daily maximum discharge limits for copper, and the instantaneous, daily maximum, and loading daily maximum discharge limits for zinc, for which an NOV was issued on February 28, 2024. On March 31, 2024, OC San conducted 30-day resample activities, in which the samples collected demonstrated compliance with the copper and zinc discharge limits. On June 28, 2024, Prima-Tex stated they conducted a review of operating records for February 8, 2024, and could not determine a source for the exceedances.

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

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

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

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On May 22, 2024, Q-Flex exceeded the instantaneous and daily maximum discharge limits for copper, for which an NOV was issued on June 11, 2024. This also caused an exceedance of the copper monthly average discharge limit for May 2024. OC San will issue an NOV for the May 2024 monthly average discharge limit exceedance during the next reporting period.

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

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

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

During 2022, RBC had multiple cadmium violations. RBC removed the floor grating above the sump tank leading to the designated sample point located in the plating room, and a residue was discovered on top of these tank covers. RBC concluded that there may have been some drag-out from the cadmium plating process which was flowing to the sample point. RBC replaced the tank covers and refabricated them to completely seal the tanks and not allow external materials to enter the waste stream.

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

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

July 1 – December 31, 2023

On September 13, 2023, RBC had a cadmium violation, for which an NOV was issued on October 4, 2023. This violation resulted in a monthly average discharge limit violation for cadmium for the month of September 2023, for which an NOV was issued on December 1, 2023. On October 2, 2023, RBC had another cadmium violation, for which an NOV was issued on November 20, 2023. This violation resulted in a monthly average discharge limit violation for cadmium for the month of October 2023, for which an NOV will be issued during the next reporting period.

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

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

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

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

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

January 1 – June 30, 2024

On January 2, 2024, OC San issued an NOV for the October 2023 cadmium monthly average discharge limit exceedance. On January 10, 2024, OC San issued an order to cease noncompliant discharge due to the highly elevated cadmium (and cyanide) concentrations resulting in multiple violations. The order required RBC to attend a compliance meeting.

On January 17, 2024, a compliance meeting was held between OC San and RBC. Prior to the compliance meeting, RBC investigated the potential sources for the cadmium exceedances, and determined that an operator was incorrectly disposing floor waste from a mop bucket into the tanks behind the tumbling and deburring machines. It was also discovered that a portable submersible pump used to transfer cadmium process chemicals may have been used to transfer rust inhibitor and liquid soap to the tumbling and deburring machines. RBC did confirm that all mop water is sent to a dedicated tank next to the evaporator unit and is evaporated along with manufacturing process wastewater. In response to the order to cease, RBC elected to discontinue wastewater discharge from tumbling and deburring operations until long-term compliance with the permitted discharge limits can be achieved. RBC also scheduled complete cleaning of the tumbling and deburring machines and will replace the tumbling and deburring media with new virgin media, soap, and rust inhibitor. RBC stated they would hold mandatory training for all employees regarding sewer discharges, and resume discharge to the sewer only upon confirmation that cadmium has been eliminated from all sources of wastewater.

On March 5, 2024, OC San issued an NOV for the cadmium instantaneous and daily maximum discharge limit exceedances which occurred on December 3, 2023.

On March 6, 2024, OC San issued three NOVs: 1) cadmium instantaneous, daily maximum, and loading daily maximum discharge limit exceedances which occurred on November 2, 2023; 2) November 2023 cadmium monthly average discharge limit exceedance; and 3) December 2023 cadmium and cyanide monthly average discharge limit exceedances.

On March 12, 2024, OC San issued RBC a compliance requirements letter summarizing the compliance meeting held on January 17, 2024. OC San also required RBC to: 1) Provide copies of all wastewater sample results during cleaning and investigation activities, 2) notify OC San a minimum of five days prior to resuming wastewater discharge to the sewer, and 3) conduct mandatory seven-day (or one full business week) multi-day verification sampling upon the resumption of wastewater discharge to the sewer.

RBC did not discharge wastewater to the sewer during the remainder of the reporting period.

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

Rigiflex Technology, Inc. (Permit No. 1-021187)

Rigiflex Technology, Inc. (Rigiflex) manufactures prototype printed circuit boards. Onsite operations including image printing, developing, etching, stripping, micro-etching and cleaning, drilling, solder-masking, and laminating. Rigiflex subcontracts any metal plating required for fabrication. Rigiflex maintains one film developer, one alkaline etcher, one photopolymer resist stripper, one solder-mask developer, two pumice scrub wash booths, and several conditioning and cleaning lines. Rigiflex discharges wastewater generated from the developers, the photopolymer resist stripper, and the wash booths to an equalization tank, to a pretreatment tank for continuous pH adjustment then final discharge to the sample point and sewer. High-concentrated metal-bearing wastewater generated from active etching and conditioning equipment is discharged to a closed-loop ion exchange system. Rigiflex wastehauls spent process chemicals and ion exchange system regenerate.

July 1, 2023 – December 31, 2023

Rigiflex had no violations during the reporting period.

January 1, 2024 – June 30, 2024

On June 11, 2024, Rigiflex exceeded the instantaneous and daily maximum discharge limits for copper, for which an NOV was issued on June 25, 2024.

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

Santana Services (Permit No. 1-021016)

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

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

Santana's wastewater discharge permit was voided during the previous reporting period.

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

Scisorek & Son Flavors, Inc. (S&S Flavors) is a manufacturer of food flavors used in candies, ice cream, popsicles, coffee grinds, juices, and other miscellaneous food applications. Artificial and natural ingredients are mixed and blended in tanks to create concentrated flavor powders and syrups. Process tanks and mixing vessels, ranging from one to 1,000-gallon capacity, are utilized for batch production of specialized liquid flavors. Wastewater is generated from cleaning of process tanks, mixing vessels and floors. Equipment and flooring are cleaned with water and sanitizer following each batch run. Wastewater is

directed to floor drains located within each production area. S&S Flavors does not have a pretreatment system.

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 8, 2024, OC San issued an NOV for the December 2023 pH violation. On January 9, 2024, S&S Flavors submitted a corrective action report which attributed the pH violation to a small release of a low pH-based product during manufacturing. S&S Flavors reported that while preparing to package the final product, a small spill occurred which reached an adjacent floor drain before spill containment procedures could be employed. Spill containment procedures were followed by facility personnel to contain the release. However, due to the location of the spill kits away from the production area, a small amount of this product was released before it could be contained. Corrective actions identified by S&S Flavors in the report included relocation of the spill kit to the production room, amending their spill containment procedures to include a final inspection step to be performed by the production manager, and training of personnel on the new procedures.

On February 7, 2024, OC San conducted a compliance inspection to verify corrective actions had been implemented and collect a resample. During the inspection, OC San reviewed facility operations and verified corrective actions had been implemented. Resample results showed compliance with the pH discharge limit.

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

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

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

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On December 8, 2023, Cherry Aerospace had instantaneous, daily maximum, and production based loading daily maximum discharge limit exceedances for cyanide for which an NOV was issued on January 29, 2024.

On March 6, 2024, OC San issued three NOVs: 1) Instantaneous, daily maximum, and production based loading daily maximum discharge limit exceedances for cyanide which occurred on December 14, 2023; 2) instantaneous, daily maximum, and production based loading daily maximum discharge limit

exceedances for cyanide which occurred on December 28, 2023; and 3) a December 2023 cyanide monthly average discharge limit exceedance.

On June 11, 2024, Cherry Aerospace exceeded the daily maximum and loading daily maximum discharge limits for cadmium, for which an NOV was issued on June 25, 2024. This also caused a June 2024 monthly average discharge limit exceedance for cadmium, for which an NOV will be issued in the next reporting period.

On June 17, 2024 OC San issued Cherry Aerospace an NOV for failing to comply with permit conditions and for failing to report all self-monitoring results. OC San learned that following the first cyanide exceedance on December 8, 2024, Cherry Aerospace collected two additional samples (December 14 and 28, 2024) from the legal sample point for cyanide which were in exceedance of the permitted discharge limits but did not report this information to OC San. Cherry Aerospace failed to notify OC San within 24-hours of becoming aware of any exceedance and did not notify OC San of additional self-monitoring samples collected from the legal sample point which were in exceedance of the permit discharge limits. OC San required Cherry Aerospace to submit any unreported self-monitoring Results by July 17, 2024.

Although several emails were exchanged regarding tentative options for stormwater mitigation measures, Cherry Aerospace failed to submit a proposal to OC San as required.

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

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

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

July 1 – December 31, 2023

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

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

January 1 – June 30, 2024

On January 2, 2024, OC San issued an NOV for the October 2023 chromium monthly average discharge limit exceedance. On December 6, 2023, SMP had chromium daily maximum and loading daily maximum discharge limit exceedances for which an NOV was issued on January 8, 2024. On December 5, 2023, SMP had chromium daily maximum and loading daily maximum discharge limit exceedances for which an NOV was issued on January 17, 2024. On December 21, 2023, SMP had chromium daily maximum discharge limit exceedances for which an NOV was issued on January 19, 2024. On January 30, 2024, SMP exceeded the daily maximum and loading daily maximum chromium discharge limits, for which an NOV was issued on March 11, 2024.

On March 4, 2024, OC San issued an NOV for the December 2023 chromium monthly average discharge limit exceedance. On April 1, 2024, OC San issued an NOV for the January 2024 chromium monthly

average discharge limit exceedance. On June 24, 2024, OC San issued SMP an NOV for failing to notify OC San of a change of ownership.

OC San will issue a new permit during the next reporting period and will continue to monitor SMP's discharge and compliance status on a quarterly basis.

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

Star's wastewater discharge permit was voided during the previous reporting period and had no wastewater discharge to the sewer. No further actions are required at this time.

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

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

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

July 1 – December 31, 2023

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

Statek had no further violations during the reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further action is required at this time and this enforcement case is closed.

January 1 – June 30, 2024

Statek had no violations during this reporting period.

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

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

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

Statek had two pH violations in August 2022. A facility inspection was also held in August 2022. Statek was required to attend a compliance meeting in April 2023. Compliance requirements were issued in June 2023.

July 1 – December 31, 2023

Statek submitted documentation required in the June 15, 2023, compliance requirements letter on July 11, 2023. After requesting clarifying information, OC San received additional documentation on October 27, 2023, and October 31, 2023.

January 1 – June 30, 2024

On May 1, 2024, Statek provided an updated operation and maintenance manual with additional information regarding the alarm set points of the pretreatment system for pH. On June 18, 2024, OC San issued a compliance requirements letter, accepting Statek's response and corrective actions.

Statek had no violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press is also used. Decant from batch treatment is discharged to the final discharge tank.

In July and August 2021, Summit had copper mass violations. In September 2021, OC San conducted a compliance inspection to investigate the causes of these violations. Summit attributed the source of the mass violations to a portion of the flow from the unchelated copper waste stream that bypassed the ion exchange system and was directly discharging to the final discharge tank due to a partially plugged carbon vessel. Summit had another copper violation in October 2021. In January 2022, OC San issued an NOV for the October 2021 copper monthly limit violation. OC San issued a compliance requirements letter in January 2022 requiring Summit to attend a compliance meeting. A compliance meeting was held in January 2022, where Summit attributed the copper violations to a plugged carbon vessel on the unchelated system, an undersized motor and pump, and solenoid valves being stuck open for several production processes. Summit has since replaced the carbon vessel, replaced the pump and motor, and replaced the solenoid valves. OC San issued a compliance requirements letter in March 2022 to require Summit to conduct multiday self-monitoring, provide updated pretreatment system drawings and an updated operation and maintenance (O&M) manual. Multi-day self-monitoring demonstrated continuous compliance, and Summit submitted the updated pretreatment system drawings in April 2022. After inadequate submittals of a revised O&M manual, OC San required Summit to submit a revised O&M manual by July 15, 2022. On June 21, 2023, Summit had an instantaneous copper violation for which an NOV will be issued during the following reporting period.

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 31, 2024, Summit had a pH violation, for which an NOV was issued on February 28, 2024.

On March 11, 2024, Summit provided a root cause analysis and attributed the pH violation to a problem with the ground wire on the pH controller that controls the chemical feed to their batch discharge tank. Summit has since repaired the wiring.

Summit had no further violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 18, 2024, OC San conducted a compliance inspection to determine the source of the dissolved and total sulfides exceedances. Summit-Orange explained they had removed solids from their clarifier in an effort to meet compliance and its corrective action report was received by OC San the same day.

On January 18, 2024, samples collected during the compliance inspection also exceeded the instantaneous discharge limit for dissolved and total sulfides, for which an NOV was issued on February 12, 2024. Summit-Orange began pretreating with ferrous sulfate to improve sulfide removal prior to this discharge.

On March 14, 2024, OC San conducted a subsequent compliance inspection and sampling activities. The results from the follow-up sample event demonstrated compliance with the permit discharge limits for sulfide. On April 12, 2024, OC San received a corrective action report from Summit-Orange, which outlined the use of ferrous sulfate to treat for sulfide.

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

Sunny Delight Beverages Co. (Permit No. 1-021045)

Sunny Delight Beverages Co. (Sunny Delight) blends juice concentrate, soft water, sugar, and other pre-mix ingredients into several blend tanks based on a set recipe that is controlled by a computer program. On average, Sunny Delight blends one batch tank per hour depending on production. Wastewater is generated by a flavor change, weekly CIP of machinery and blend tanks, floor washing/cleaning, boiler blowdown, cooling tower bleed, and regeneration of the soft water system.

July 1 – December 31, 2023

Sunny Delight had no violations during this reporting period.

January 1 to June 31, 2024

On April 23, 2024, Sunny Delight had a pH violation for which an NOV was issued on May 6, 2024. On May 21, 2024, OC San conducted a compliance inspection, during which Sunny Delight stated no discharge was occurring. However, pH and flow data confirmed that the sample was valid and in noncompliance. The existing sample point was neglected and poorly maintained by the permittee, exhibited by cracking in the tubing leading to the sample point. During the inspection Sunny Delight could not identify a root cause for the pH violation. Due to the lack of legible drawings, it was unclear if there are other flows routed to the sample point that could impact pH control and compliance. As a result, OC Can requested updated drawings, flow and pH data for Sunny Delight's control system, and relocation of the sample point.

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

Superior Connector Plating (Permit No. 1-021090)

Superior Connector Plating is a medium-sized plating shop serving both aerospace and commercial customers. Wastewater generating operations include acid activation, alkaline cleaning, alkaline tin plating, black chromate, bright dip, bright nickel plating, bright silver plating, bright tin plating, cadmium plating,

chem film, clear chromate, copper plate, copper strike, electroless nickel plating, fuse oil, gold plating, hot D.I. rinsing, liquid water displacement, matte silver plating, nickel plating, nickel strike, nitric dip, olive drab, passivation, permanganate (descale), rinsing (countercurrent, running, & static), silver strike, tin / lead plating, yellow chromate, and zincate. Superior operates a batch pretreatment system, which consists of pH adjustment, cyanide destruct, chromium reduction, chemical precipitation, clarification, coagulation, filter press and final effluent filtration. The non-metal waste streams undergo pH adjustment only.

July 1 - December 31, 2023

Superior Connector Plating had no violations during this reporting period.

January 1 - June 30, 2024

On January 18, 2024, Superior Connector Plating exceeded the daily maximum discharge limit for cadmium, for which an NOV was issued on February 8, 2024.

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

Tawa Services, Inc (Bakery Central Kitchen) (Permit No. 1-601895)

Tawa Services, Inc. (Bakery Central Kitchen) (Tawa BCK) is a commercial bakery which produces baked goods consisting of cakes, cookies, breads, muffins, and baked goods for purchase at Tawa Services, Inc. brand supermarkets (such as Walong Market, 99 Ranch, etc.). Ingredients are mixed and weighed according to recipes to form a cake mix or dough. Cakes and cookies are placed on sheet trays or in molds, while muffins are placed in muffin tins, then baked and packaged for distribution. Dough for breads and baked goods is formed and proofed prior to baking. After baking, the baked goods are allowed to cool prior to packaging, storage, and shipment. Wastewater is generated from the cleaning/washing/rinsing/sanitization of the mixers, process equipment, loaf pans/sheet trays, and floor wastes. Wastewater flows to a two-stage underground clarifier along the north side of the facility.

On January 12, 2022, OC San conducted an Industrial Waste Survey inspection, in which it was determined Tawa BCK warranted a Class 1 Wastewater Discharge Permit. Following several correspondence requesting the submittal of a permit application, one was not received. A Class 1 Wastewater Discharge Permit Application was received on December 29, 2022. OC San issued Permit No. 1-601895 to Tawa BCK on April 1, 2023.

July 1 - December 31, 2023

Tawa BCK had no violations during this reporting period.

January 1 – June 30, 2024

On January 9, 2024, OC San issued Tawa BCK an NOV for failing to comply with permit conditions, as Tawa BCK did not notify OC San upon the departure of the responsible officer. OC San required Tawa BCK to submit new forms certifying a new responsible officer, and the election of designated signatory no later than January 31, 2024. On January 22, 2024, OC San received new responsible officer and designated signatory Forms.

On February 28 and 29, 2024, Tawa BCK had pH violations, for which an NOV was issued on April 10, 2024. On May 22 and June 19 and 20, 2024, Tawa BCK had additional pH violations, for which NOV's will be issued during the next reporting period.

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

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

Tawa Services, Inc (Food and Meat Processing Center) (Tawa FPMC) produces a variety of food items consisting of steamed dumplings, steamed buns, vegetables, and single serve meals. Meat products produced include beef, pork, lamb, chicken and duck, as well as seafoods including shrimp and squid. Bulk

raw materials (meats as previously indicated, flour, rice, vegetables, eggs, nuts, various sauces, spices, and oils) arrive onsite and are stored in various locations based on production and FDA requirements. Raw meats needing preparation are cut, sliced, or trimmed according to the specific use and recipe. Meats are marinated as needed. Ingredients are mixed and weighed according to recipes. All food items are either steamed, baked, fried, or sautéed to the recipe specifications. After completion, all food items are placed in appropriate packaging. The items can be cooled or frozen prior to shipment to Tawa branded supermarkets. Wastewater is generated from the cleaning/washing/rinsing/sanitization of the mixers, process equipment, and floor wastes. Wastewater flows to a large underground clarifier along the south side of the facility.

On January 12, 2022, OC San conducted an Industrial Waste Survey inspection, in which it was determined Tawa FPMC warranted a Class 1 Wastewater Discharge Permit. In December 2022, OC San issued an NOV to TAWA for discharging wastewater to the sewer without a wastewater discharge permit. OC San issued Class I Wastewater Discharge Permit No. 1-601896 to Tawa FPMC on April 1, 2023.

July 1 – December 31, 2023

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

January 1 – June 30, 2024

On January 9, 2024 OC San issued Tawa FMPC an NOV for failing to comply with permit conditions, as Tawa FMPC did not notify OC San upon the departure of the responsible officer. OC San required Tawa FMPC to submit new forms certifying a new responsible officer, and the election of designated signatory no later than January 31, 2024. On January 22, 2024, OC San received new responsible officer and designated signatory Forms.

On February 29, 2024, Tawa FMPC had a pH violation, for which an NOV was issued on March 11, 2024. On April 10, 2024, Tawa FMPC had a pH violation, for which an NOV was issued on April 23, 2024. On June 20, 2024, Tawa FMPC had another pH violation, for which an NOV will be issued during the next reporting period.

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

Taylor-Dunn Manufacturing, LLC (Waev) (Permit No. 1-601699)

Taylor-Dunn Manufacturing, LLC (Waev) (Taylor-Dunn) (previously permitted under Permit No. 1-021123) manufactures industrial electric utility carts, lifts, and load carriers. Wastewater is generated from the iron phosphate pressure washing process prior to any painting application. Wastewater is directed to a sump where pH adjustment with caustic occurs. Wastewater then overflows to the final sump for clarification prior to discharge.

July 1 – December 31, 2023

Taylor-Dunn had no violations during this monitoring period.

January 1 – June 30, 2024

On June 20, 2024, Taylor-Dunn exceeded daily maximum discharge limit and the monthly average limit for zinc, for which NOVs will be issued during the next reporting period.

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

Terra Universal, Inc. (Permit No. 1-601407)

Terra Universal, Inc. (Terra Universal) performs assembly and manufacturing of cleanroom and laboratory equipment. Terra Universal receives plastic, sheet metals, and metals tubes of mostly steel with some aluminum. The dry process includes plastic and metal cleaning, cutting, welding, polishing, and assembly.

The sheet metals are cut, formed, and welded to make the component, then sent through the powder coating line. Once powder coated, parts are assembled and packaged for shipment.

Wet process includes rinsing of only metal tubes before powder coating. The powder coating line consists of five stages, only rinses from stages 2,3 and 5 discharge to the sewer after pH adjustment. Terra Universal also has an RO unit, where the RO brine is also discharged to the sewer.

July 1 – December 31, 2023

Terra Universal had no violations during this monitoring period.

January 1 – June 30, 2024

On January 30, 2024, Terra Universal exceeded the daily maximum discharge limit for zinc, for which an NOV was issued on February 21, 2024. This exceedance also caused a zinc monthly average discharge limit exceedance for January 2024, for which an NOV was issued on April 1, 2024

On March 11, 2024, Terra Universal submitted a root cause analysis and corrective action report, attributing to the exceedance to processing of galvanized steel through their washer, and noted that they have not cleaned out their clarifier. As a corrective measure, Terra Universal will perform a clean out and will schedule quarterly clean outs of their clarifier as a preventative measure.

On February 27, 2024, Terra Universal exceeded the daily maximum discharge limit for zinc, for which an NOV was issued on March 11, 2024. This exceedance also caused a zinc monthly average discharge limit exceedance for February 2024, for which an NOV was issued on May 3, 2024.

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

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

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

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

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

July 1 – December 31, 2023

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

January 1 – June 30, 2024

There were no violations during this reporting period. OC San continues to review information received from Thermal-Vac.

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

Thompson Energy Resources, LLC (Brea) (Permit No. 1-601469)

Thompson Energy Resources, LLC (Thompson) produces crude oil from multiple well sites, separating groundwater from the extracted oil with heat and chemical treatment. The produced water flows through heat treatment in a heat room followed by storage in a wash tank. The water from the wash tank is routed to a surge tank, which is one of the first steps in the chemical treatment process. Following treatment, produced wastewater is stored in one of two wastewater storage tanks. One of these storage tanks has been out of service for a few years and the new ownership is currently working on putting it back in service to improve the final effluent's temperature and additionally improve O&G separation.

July 1 – December 31, 2023

Thompson had no violations during this monitoring period.

January 1 – June 30, 2024

On April 9 and 10, 2024, OC San conducted quarterly inspection and sampling activities. During the inspections, OC San collected multiple temperature measurements of the wastewater discharged in excess of 140 degrees Fahrenheit (60 degrees Centigrade).

On May 7, 2024, OC San issued a probation order to address Thompson's delinquent balance due to nonpayment.

On June 13, 2024, OC San issued an NOV to Thompson for a violation of OC San's Ordinance, which prohibits the discharge of any pollutant, substance or wastewater which has a temperature higher than 140 degrees Fahrenheit (60 degrees Centigrade).

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

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

Tiodize Company, Inc. (Tiodize) is a medium size job shop providing metal 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 operation generally proceeds as follows: alkaline cleaning, rinsing, surface finishing (anodizing, chemical etching, conversion coating, or 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 (acetone, methyl ethyl ketone) cleaning, organic coating (solvent or water-based painting), and curing. Mask removal, if applicable, is accomplished by soaking in solvent and manual wiping. The effluent discharge at Tiodize is generated by the various rinse wastestreams from process operations. Pretreatment includes chromium reduction, pH neutralization, metal precipitation, flocculation and settling in a Lamella Gravity Settler (LGS), and post-treatment pH adjustment prior to sewer discharge. Solids from the LGS are dewatered, conveyed to the filter press, and the cake is transferred to a sludge dryer. Filtrate is returned to the pretreatment process, and dried cake is bagged and wastehailed.

July 1 – December 31, 2023

In November 2023, Tiodize exceeded the monthly average discharge limit for lead, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2024

On February 1, 2024 OC San issued an NOV for the lead monthly average discharge limit exceedance which occurred in November 2023. On February 20, 2024, OC San conducted a compliance inspection. During the inspection, Tiodize noted that a hot cleaning tank had been overfilled and solution had been discharged to the wastewater treatment. This event caused a disruption in the pretreatment system which resulted in reduction in the quality of floc produced in the precipitation and clarifying process.

On March 19, 2024, Tiodize provided a corrective action report to OC San, documenting corrective actions that were taken to address any system deficiencies that caused the exceedance. In addition to monitoring the tank, Tiodize stated that they have cleaned and made repairs to the level control and water delivery solenoids for the cleaning tank to prevent over-filling.

On April 23, 2024, OC San issued a compliance requirements letter accepting the corrective actions and required Tiodize to submit an updated operation and maintenance manual by June 15, 2024.

Tiodize had no additional violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

TTM Technologies North America, LLC (TTM Technologies) is a large scale, full-service printed circuit board shop. Wastewater is generated from the processing of copper laminates into printed circuit boards. Wet processes include copper plating, electroless copper plating, nickel/gold plating, solder mask, alkaline cleaning, acid cleaning, scrubbing, developing, resist stripping, tin stripping, etching, screen cleaning, oxide coating, and miscellaneous cleanup/mop water. Rinse schemes practiced at the facility include significant use of static rinses in addition to running rinses. TTM Technologies operates a continuous pretreatment system to treat low concentration wastestreams, consisting of pH adjustment and multiple ion exchange resin beds, with a large portion of the effluent reused onsite. Batch treatment is performed on spent solutions and ion exchange backflush and consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press. Concentrated wastestreams (etchant, spent plating solutions) are wastehailed offsite.

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

July 1 – December 31, 2023

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

TTM Technologies had no further violations during the reporting period subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further action is required at this time and this enforcement case is closed.

January 1 – June 30, 2024

TTM Technologies had no violations during this reporting period.

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

TTM Technologies North America, LLC (Croddy) (Permit No. 1-511366)

TTM Technologies North America, LLC (Croddy) (TTM Technologies) is a large -scale printed circuit board manufacturer. TTM Technologies manufactures rigid multilayer printed circuit boards from copper clad and prepreg materials. TTM Technologies is a full service facility that specializes in quick-turn, prototype, and semi-production orders for commercial, computer electronics, industrial, medical, and telecommunication applications. The effluent discharge at TTM Technologies is generated by the various spent process solutions and the associated rinse stages produced at this location. (TTM Technologies operates two locations in Santa Ana operating in tandem, but discharging wastewater under separate Permits).

July 1 – December 31, 2023

TTM Technologies had no violations during this reporting period.

January 1 – June 30, 2024

On April 8, 2024, OC San issued TTM Technologies an NOV for failing to comply with permit conditions and notify OC San of process changes. TTM Technologies removed an existing reverse osmosis (RO) system and installed a new RO system in December 2023. During the RO system replacement activities, a modification was made to the RO reject piping configuration which altered the facilities flow to the legal sample point. TTM Technologies failed to notify OC San of the proposed piping modifications. OC San required TTM Technologies to submit updated as-built piping diagrams of the new RO system and install a flow meter to record the volume of RO reject discharged to OC San's Sewerage Facilities.

On April 30, 2024, OC San received the updated as-built diagrams for the new RO system and process meter proposal.

TTM Technologies had no further violations during this reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further enforcement is required at this time and this enforcement case is closed.

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

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

Universal Molding Co. (UMC) provide chem-film coating and liquid painting on aluminum assemblies used for various architectural applications. UMC received pre-fabricated aluminum pieces which receive surface preparation and chem-filmed prior to liquid paint application and final packaging.

Wastewater generating processes include rinses from the surface preparation and chem-film coating process. Wastewater treatment consist of hexavalent chromium reduction with sodium metabisulfite, followed by hydroxide precipitation, coagulation, flocculation, and filtration.

July 1 – December 31, 2023

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

cleaning the clarifier and has scheduled annual pump-out of the clarifier, removal of spraying of racks after chromium phosphate tank to reduce any spill over into non-chromium rinse tanks, and retraining of their operators. On November 1, 2023, an NOV was issued for the August monthly chromium violation.

January 1 – June 30, 2024

Universal Molding had no violations during the reporting period and subsequent sampling has demonstrated compliance with discharge limits. Therefore, no further action is required at this time and this enforcement case is closed.

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

Winonics LLC. Dba Bench 2 Bench Technologies (Permit No. 1-601974)

Winonics LLC dba Bench 2 Bench Technologies (Winonics) is a large, full service printed circuit board facility. Industrial wastewater is generated by the processing of copper-clad laminates into printed circuit boards. Wet processes performed at the facility include photoresist application, copper plating, electroless copper plating, nickel/gold plating, tin plating, soldermask, acid and alkaline cleaning, scrubbing, developing, resist stripping, tin stripping, permanganate etching, cupric chloride etching, ammonia etching, Circubond (black oxide) and miscellaneous cleanup/mopwater. Winonics operates a continuous treatment system with pH adjustment, flocculation, clarification, and solids dewatering with a filter press. Winonics also operates a batch treatment system for acidic solutions and rinses. Resist stripper solutions, developer solution and all final rinses discharges directly to the sample point without treatment. Winonics also discharges aqueous fume scrubbing, R.O. reject to the sample point.

July 1 – December 31, 2023

Winonics had no violations during this monitoring period.

January 1 – June 30, 2024

In May 2024, Winonics exceeded the monthly average discharge limit for copper, for which an NOV will be issued during the following reporting period.

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

Yakult USA, Inc. (Permit No. 1-021735)

Yakult USA, Inc. (Yakult) processes and packages probiotic dairy beverages. Wastewater is generated from daily cleaning and sanitizing operations. The wastewater gravity flows through floor drains to an equalization tank for pH adjustment, and then through a Parshall flume for flow measurement prior to sewer discharge.

July 1 – December 31, 2023

Yakult had no violations during this monitoring period.

January 1 – June 30, 2024

On June 17, 2024, OC San issued Yakult an NOV for failing to comply with OC San's Ordinance Prohibitions. OC San noted Yakult had uncovered outdoor floor drains located where the boilers, reverse osmosis systems, and cooling towers are located. These floor drains are susceptible to stormwater intrusion and discharge to the sewer, which is prohibited under OC San's Ordinance. OC San required Yakult to submit a proposal to prevent the discharge of stormwater to the sewer by August 16, 2024.

OC San will continue enforcement during the next reporting period and will continue to monitor Yakult's discharge and compliance status on a 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 2023/24 consists of one manager, three supervisors, nine engineers, four environmental specialists, 10 field inspectors, four field technicians, and six administrative support personnel for a total of 37 staff members.

5.2.2 Revenues

During FY 2023/24, a total of \$21,743,178.54 in revenue payments were made to OC San by Class I, Class II, Wastehauler, Special Purpose Discharge, and FOG FSE permittees. The following amounts were collected for the discharge of wastewater, biochemical oxygen demand, and suspended solid pollutants. Operation and maintenance (O&M) fees totaled \$14,591,078.08, Supplemental Capacity Facilities Capacity Charge (SCFCC) fees totaled \$5,549,985.89, and wastehauler user fees totaled \$934,801.57. Permit fees in the amount of \$580,578.00 were collected, and over \$86,735.00 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 2022/23 and an estimate of FY 2023/24.

The revenue collected offsets a portion of OC San's treatment costs and the \$7,644,669 needed to administer the pretreatment program, including labor, supplies, equipment, and other overhead. These costs are associated with issuing permits, sampling, inspections, and laboratory analyses.

5.2.3 Program Costs

Overall pretreatment program implementation costs (including overtime) during the fiscal year increased 0.05% over the preceding year and shows a 6.1% increase from the program costs of five years ago. The cost per labor hour over the past five years has increased 15.9%, which is an average of 3.2% 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
2019-20	\$7,206,630	71,355	\$101.00
2020-21	\$6,630,445	68,713	\$96.49
2021-22	\$5,334,568	70,082	\$76.12
2022-23	\$7,641,063	67,720	\$112.83
2023-24	\$7,644,669	65,304	\$117.06

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 15 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 2023/24
Orange County Sanitation District

Description	Quantity
Vehicles	13
Equipment	
Cellular phones	29
Laptop computers	32
Composite samplers – general use	53
Composite samplers – special purpose	16
Portable sample pumps	13
pH meters – portable	20
Gas meters	44

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 2023/24. Values provided in the tables are derived primarily from manifests provided by the wastehauler companies.

6.3.1 Wastehauler Permitting

A liquid wastehauler must first register with the Orange County Health Care Agency (OCHCA) and have all vehicles that intend to discharge at OC San inspected by OC San staff to obtain a wastehauler permit from OC San. Numerical decals issued by both OCHCA and OC San are affixed to all permitted vehicles. These decals aid in the identification of authorized dischargers. Permits include but is not limited to rules for use of the wastehauler station and enforcement for violations. Wastehaulers must conduct their business using methods to reduce or eliminate odors. During FY 2023/24, 45 wastehauler companies were under permit with OC San, with a total of 152 vehicles.

6.3.2 Wastehauler Discharges

During the past fiscal year, 7.8 million gallons (MG) of waste was discharged by permitted wastehaulers at the OC San Wastehauler Station. The number of loads received decreased 37.3% from FY 2022/23. 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 2019/20-2023/24 Orange County Sanitation District		
FY	Loads Delivered	Volume Waste Received (MG)
2019-20	8,467	12.6
2020-21	6,675	10.0
2021-22	7,940	11.6
2022-23	8,157	11.6
2023-24	5,111	7.8

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 2023/24 Orange County Sanitation District			
Load Type	Loads Delivered	Waste Received (MG)	% Waste Received
Brine	0	0	0%
Cesspool	39	0.04	0.55%
Chemical toilet	4156	5.70	73.54%
FSE grease	593	1.48	19.14%
Septic tank	323	0.52	6.77%
All Types Total	5,111	7.75	100%

During the past fiscal year 1.48 million gallons of FSE grease was discharged by permitted wastehaulers at OC San's Wastehauler Station. This represents a 63.5% decrease from the volume of grease discharged during FY 2022/23. 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 2019/20-2023/24 Orange County Sanitation District		
FY	Loads Delivered	Volume (MG)
2019-20	2,672	4.65
2020-21	1,924	3.08
2021-22	2,346	3.78
2022-23	2,681	4.06
2023-24	593	1.48

6.3.3 Wastehauler Monitoring

Random sampling of wastehauler loads is conducted to verify compliance with OC San discharge limits. During FY 2023/24, the contents of 725 discrete wastehauler loads (14.2% of all loads received) were sampled and 4,350 metal analyses were performed. The results of the sampling included 15 metal violations in 725 loads that originated from either domestic sources or grease hauling. This represents a 2.07% violation rate of the total samples taken and analyzed. The violations included nine copper and six

zinc concentration exceedances. Some of the actions taken by OC San as a response to these violations included generator verifications and inspections, investigations, NOV letters, and compliance meetings.

6.4 Inspection and Sampling

OC San schedules sampling and inspection of each Class I industry on a quarterly basis, and samples select Class II industries periodically. Permittees are sampled for metals, cyanide, organics, pH, oil and grease, biochemical oxygen demand (BOD), and suspended solids (SS). Inspections are conducted before and/or after each 24-hour composite sampling event, at the time of collecting a grab sample, and to determine compliance with other provisions of the Ordinance.

6.5 Quality Assurance and Quality Control (QA/QC) Activities

6.5.1 QA/QC Program Tasks

The objective of the QA/QC program is to ensure that all field sampling and monitoring is accurate and performed in accordance with Resource Protection Division's adopted policies and procedures. The QA/QC program includes the following components.

Equipment Blank – Composite samples of deionized water are collected monthly to evaluate the cleaning procedures and storage of automatic sampling equipment.

Archive Sample Check – Archived heavy metal samples are analyzed monthly, several months after collection, to evaluate the effects of sample storage conditions and whether those conditions impose analyte degradation or contamination.

Sample Collection Check – Duplicate composite samples are collected quarterly to evaluate the precision of the sample collection and preservation methods.

Trip-Blank Evaluation – Samples made up of reagent water are collected to measure the potential contamination of US EPA Method 624 samples during transport and storage.

Sample Collection and Inspection Audit – Periodic reviews are conducted to assure that inspectors conform to existing guidelines for inspection and sample collection, and that existing procedures continue to ensure representative data. Document reviews are completed to assess overall inspector performance.

During FY 2023/24, 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 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 2023/24 are listed in Table 6.4 below. These reporting limits are used in calculations in tables where RLs appear.

6.5.2 QA/QC Sampling Results

Evaluation of Equipment Blank Sampling Results

To check for contamination of sampler and field equipment, two composite samples are collected each month using clean, randomly chosen automatic samplers. The two samplers are set at the Source Control Inspection group's technician room in a controlled setting to run a composite sampling program to collect samples from a deionized water supply. The equipment blank samples are composited and preserved in the same manner as compliance samples collected at permitted facilities. Each sampler's composite is split into three equal volumes, preserved, then submitted to and analyzed individually by OC San's laboratory for heavy metal constituents.

The results of this study are summarized in Table 6.4. The statistics presented below show that 100% of the analyses (432 of 432 analyses) are at or below the heavy metal constituents RL.

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2023/24 Orange County Sanitation District					
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
Chromium	0.02	72	100	0	0
Copper	0.02	72	100	0	0
Nickel	0.10	72	100	0	0
Lead	0.02	72	100	0	0
Zinc	0.10	72	100	0	0
Summaries		432	100	0	0

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)

Evaluation of Archived Samples

Archived samples are submitted to OC San's laboratory to evaluate the effects of sample splitting and storage techniques. The results of the archive sample analysis are compared with the original sample results and the RPD is calculated for each metal. Results at or below the RL are calculated as equal to the RL.

Statistics on the archived samples and RPD are summarized in Table 6.5. Of the 288 comparisons performed on 96 samples (48 archived samples and 48 original samples), 99.3% of the results were within the acceptable RPD.

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2023/24 Orange County Sanitation District				
Constituent	Comparisons within acceptable RPD	Comparisons outside acceptable RPD	Percent within acceptable RPD	Average RPD (%)
Cadmium	96	0	100	0
Chromium	95	0	100	12
Copper	93	1	99	7
Nickel	96	0	100	8
Lead	96	0	100	7
Zinc	96	0	100	7
Summaries	572	4	99.3	7

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 2023/24 Orange County Sanitation District								
Qtr.	Location	Average Deviations						
		Cadmium	Chromium	Copper	Nickel	Lead	Zinc	TSS
1	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	0.0
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	0.0
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	0.50
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	0.80
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	13.7
3	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	0.10
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	0.20
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	4.60
4	Sampler A	0.00	0.00	0.00	0.00	0.00	0.00	0.50
	Sampler B	0.00	0.00	0.00	0.00	0.00	0.00	0.60
	Site RPD (%)	0.00	0.00	20.18	0.00	0.00	0.00	41.9
Avg	Site RPD	0.00	0.00	6.64	0.00	0.00	0.00	15.05
All results are in units of sampler average deviation. TSS = Total Suspended Solid								

The variation between samples at the same site were within appropriate ranges, indicating acceptable sample splitting. Results of all four quarterly Collection Check comparisons were within the acceptable Site RPD which indicates acceptable sample splitting techniques are used. Collection check procedures are currently being evaluated and staff will be notified of any changes if necessary.

Trip Blank Evaluation for US EPA Method 624 Analysis

Inspectors perform this study monthly. Containers prepared with reagent water are obtained from OC San’s laboratory and are carried by inspectors with other samples during their workday. The containers are returned to the lab and analyzed for volatile organics. Twelve trip blanks were analyzed for volatile organics using US EPA Method 624. All twelve US EPA Method 624 trip blanks were below reporting limits.

Sample Collection and Inspection Audit

During FY 2023/24, the source control supervisor audited the sample collection and inspection procedures of individual inspectors. The audit of each inspector was accomplished by document review during performance evaluations. Opportunities for improvement were discussed with individual inspectors during their mid-year and annual performance reviews.

6.5.3 QA/QC Conclusions

The following findings support the general conclusion that the sampling procedures are being followed and that the samples are representative and free of contamination.

- Results of the equipment blank evaluation demonstrate that 100% of the equipment blank samples have concentrations at or below the heavy metal reporting limits.
- Results of the archive sample evaluation demonstrate that 99.3% 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, 2023 – June 30, 2024			
Orange County Sanitation District			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-531422	A & G Electropolish	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021088	A & R Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-011138	Accurate Circuit Engineering	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011115	Active Plating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024

Table 6.7 Permitees with TTO Waivers July 1, 2023 – June 30, 2024			
Orange County Sanitation District			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-021389	Advance-Tech Plating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-531404	Air Industries Company, A PCC Company (Knott)	Metal Finishing PSNS, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2023 - Jun 30, 2024
1-031110	All Metals Processing of Orange County, LLC	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011073	Allied Electronics Services, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011036	Alloy Tech Electropolishing, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521798	Andres Technical Plating	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600295	AnoChem Coatings	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511389	Anodyne, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-011155	Anomil Ent. Dba Danco Metal Surfacing	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600689	APCT Anaheim	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600503	APCT Orange County	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021192	ARO Service	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-031137	Arrowhead Products Corporation	Iron And Steel Manufacturing PSNS, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2023 - Dec 31, 2023
1-071037	Aviation Equipment Processing	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-031094	Basic Electronics, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521824	Beckman Coulter, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511370	Beo-Mag Plating	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021213	Black Oxide Industries, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-111018	Boeing Company (Graham)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021226	Bristol Industries	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2023 - Jun 30, 2024
1-021062	Cadillac Plating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-111089	Cal-Aurum Industries, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511076	CD Video, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521821	Circuit Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-111129	Coast to Coast Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600708	Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600920	CP-Carrillo, Inc. (Armstrong)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021289	Crest Coating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021297	Custom Enamellers, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011142	Data Electronic Services, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024

Table 6.7 Permitees with TTO Waivers July 1, 2023 – June 30, 2024			
Orange County Sanitation District			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-521761	Data Solder, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-601023	Dunham Metal Plating Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021325	Dunham Metal Processing	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011064	EFT Fast Quality Service, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021158	Electro Metal Finishing Corporation	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511376	Electrode Technologies, Inc. dba Reid Metal Finishing	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-071162	Electrolurgy, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021336	Electron Plating III, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021337	Electronic Precision Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600457	Embee Processing (Plate)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-601356	Excello Circuits, Inc. (Hunter)	Metal Finishing PSNS	Jan 01, 2024 - Jun 30, 2024
1-021121	Fineline Circuits & Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-601761	Gemtech Coatings (Explorer)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021286	Harbor Truck Bodies, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521790	Hi Tech Solder	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021185	Hightower Plating & Manufacturing Co.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021081	Howmet Global Fastening Systems Inc.	Aluminum Forming PSES, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2023 - Jun 30, 2024
1-021041	Ideal Anodizing, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521756	Ikon Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511407	JD Processing, Inc. (East)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021171	Kenlen Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021428	Kryler Corporation	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600338	Lightning Diversion Systems LLC	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-021253	Linco Industries, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-511361	LM Chrome Corporation	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-031049	Logi Graphics, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-531391	Magnetic Metals Corporation	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011046	Markland Manufacturing, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-521811	Murrietta Circuits	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-571292	Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	Electrical And Electronic Components PSNS	Jul 01, 2023 - Jun 30, 2024
1-521801	Nobel Biocare USA, LLC	Metal Finishing PSNS	Jan 01, 2024 - Jun 30, 2024

Table 6.7 Permitees with TTO Waivers July 1, 2023 – June 30, 2024 Orange County Sanitation District			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-600981	Omni Metal Finishing, Inc. (Building 4)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021070	Pacific Image Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521805	Performance Powder, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011262	Pioneer Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521852	Platinum Surface Coating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600167	Powdercoat Services, LLC (Bldg E / Plant 1)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600168	Powdercoat Services, LLC (Bldg J / Plant 3)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600355	PowderCoat Services, LLC. Plant 5	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521809	Precision Anodizing & Plating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011008	Precision Circuits West, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-011013	RBC Transport Dynamics Corp.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-021187	Rigiflex Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-061008	Sanmina Corporation (Airway)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-061009	Sanmina Corporation (Redhill)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021016	Santana Services	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-031311	Scientific Spray Finishes, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600297	Shur-Lok Company	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
Z-602134	Shur-Lok Company	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-031341	Soldermask, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-601444	South Coast Circuits, Inc. (Bldg 3500 Ste A)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-601446	South Coast Circuits, Inc. (Bldg 3506 Ste A)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-601445	South Coast Circuits, Inc. (Bldg 3512 Ste A)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-601447	South Coast Circuits, Inc. (Bldg 3524 Ste A)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-511381	SPS Technologies LLC, DBA Cherry Aerospace	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2023 - Jun 30, 2024
1-021672	Stainless Micro-Polish, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-531425	Star Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021664	Statek Corporation (Main)	Electrical And Electronic Components PSES, Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024

Table 6.7 Permitees with TTO Waivers July 1, 2023 – June 30, 2024 Orange County Sanitation District			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-521777	Statek Corporation (Orange Grove)	Electrical And Electronic Components PSNS	Jul 01, 2023 - Jun 30, 2024
1-600012	Summit Interconnect, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-600060	Summit Interconnect, Inc., Orange Division	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021090	Superior Connector Plating, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-601701	Superior Processing (2)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-031012	Tayco Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-601699	Taylor-Dunn Manufacturing, LLC (waev)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-021282	Thermal-Vac Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-531415	Timken Bearing Inspection, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-111132	Tiodize Company, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-021202	Transline Technology, Inc.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-141163	Tropitone Furniture Co., Inc.	Metal Finishing PSNS	Jan 01, 2024 - Jun 30, 2024
1-511366	TTM Technologies North America, LLC (Croddy)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-511359	TTM Technologies North America, LLC (Harbor)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-521859	TTM Technologies North America, LLC. (Coronado)	Metal Finishing PSNS	Jul 01, 2023 - Dec 31, 2023
1-521836	Universal Molding Co.	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024
1-031035	Winonics (Brea)	Metal Finishing PSNS	Jul 01, 2023 - Jun 30, 2024

6.7 Special Purpose Discharge Permit Program

A special purpose discharge permit (SPDP) is issued by OC San for water and wastewater discharges to the sewerage system when no alternative method of disposal is reasonably available or to mitigate an environmental impact or threat.

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

6.7.1 SPDP Metrics and Trends

During FY 2023/24, 4 new SPDPs were issued, of which one expired; of the active SPDPs, six existing SPDPs were voided before expiration at the request of the permittees, and one SPDP was not renewed by the permittee upon expiration. During the fiscal year, there were 47 active SPDPs, a decrease from the previous fiscal year. At the end of the fiscal year, there were 37 SPDPs that remained active. Active SPDPs are renewed every two years.

The majority of the new SPDPs issued during FY 2023/24 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 2023/24, there were no enforcement actions taken against SPDP permittees.

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's Non-reclaimable Side; 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 cease discharging during a rain event.

In addition, based on EPA guidance, OC San exercises its discretion regarding monitoring requirements for CECs (e.g., PFAS, etc.) for SPDP permittees. When applicable, SPDP permittees are required to monitor for CECs, such as PFAS, and employ a waste management plan (i.e., treatment, etc.) to address pollutant loading to protect OC San's plants and the GWRS.

6.8 Self-Monitoring Program

OC San operates an extensive self-monitoring program, which is an integral part of the Resource Protection Division's monitoring and enforcement programs. OC San's self-monitoring program exceeds the minimum requirements of 40 CFR 403. To obtain a broad perspective of a permittee's discharge quality and adequately determine their compliance status, OC San takes a proactive approach to self-monitoring (per US EPA recommendation) by requiring frequent sampling in most cases. OC San determined that sampling at a higher than the recommended frequency for constituents that have a reasonable potential to be present in the wastewater is an effective method to generate sufficient data to make a fair determination of a permittee's compliance status, while balancing the need for the 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. Due to the COVID-19 pandemic starting in 2020, OC San has temporarily halted this program.

6.10 Annual Technical Review of Local Limits

OC San develops local limits in accordance with 40 CFR 403.5(c)(1) to ensure protection of its workers and treatment facilities, to prevent Pass Through and Interference, and to enable reclamation opportunities. OC San's existing local limits remain unchanged from the 2015 Technical Evaluation of Local Limits (TELL). However, OC San periodically reviews and revises its local limits to respond to changes in treatment plant infrastructure and operations, regulations, wastewater characteristics, or industrial user (IU) discharge. While TELL is a comprehensive assessment to develop local limits using three to five years' worth of historical data, a technical review of local limits (TRLL) focuses on verifying whether the existing local limits are protective of the OC San's POTW, its workers, reclamation opportunities, and the environment using recent data. OC San's NPDES permit requires validation of existing local limits annually ahead of its next TELL. This section reports findings from the TRLL.

For this reporting period OC San compared actual FY 2022/23 influent loadings for individual pollutants of concern to maximum allowable headworks loadings (MAHLs) and maximum allowable industrial loadings (MAILs) calculated during the 2015 TELL. The TRLL evaluated the ratio of FY 2022/23 MAHL to FY 2014/15 Universal MAHL and FY 2022/23 MAIL to FY 2014/15 MAIL, respectively. As presented in Table 6.8, this ratio represents the percentage change of loading received at OC San.

Table 6.8 Technical Review of Local Limits Orange County Sanitation District		
Pollutant of Concern	<u>FY 2022/23 Max Influent Loading</u> FY 2014/15 Universal MAHLs (%)	<u>FY 2022/23 Max Industrial Loading</u> FY 2014/15 MAILs (%)
1,4-Dioxane	34.06	5.83
5-day Carbonaceous Biochemical Oxygen Demand (CBOD ₅)	110.85	40.69
Ammonia	31.40	5.91
Arsenic	26.70	4.04
Cadmium	15.29	2.09
Chromium (Total)	0.46	0.06
Copper	54.91	9.59
Cyanide (Total)	8.73	1.23
Lead	6.06	0.83
Mercury	3.62	0.49
Molybdenum	31.66	4.55
Nickel	7.39	1.03
Pesticides	*	*
Oil and Grease of Mineral or Petroleum Origin	*	*
PCBs	*	*
Selenium	42.49	5.72

Table 6.8 Technical Review of Local Limits Orange County Sanitation District		
Pollutant of Concern	<u>FY 2022/23 Max Influent Loading</u> FY 2014/15 Universal MAHLs (%)	<u>FY 2022/23 Max Industrial Loading</u> FY 2014/15 MAILs (%)
Silver	0.07	0.01
Sulfide (Dissolved)	*	*
Sulfide (Total)	*	*
Zinc	31.09	5.33

* Per OC San's 2015 TELL technical memoranda, MAHL and MAIL are unnecessary for the regulatory and inhibitory limitations that apply to plant influents at the headworks or in the sewer collection systems. Best professional judgement limits are used instead.

Following EPA's *Local Limits Development Guidance*, OC San employs a ratio threshold of 60% (80% for CBOD₅) to consider revising its local limits. When a constituent loading ratio exceeds a threshold, OC San considers one or a combination of the following actions: (1) establish or revise a pollutant local limit, (2) investigate the cause of elevated loading, (3) increase IU monitoring and (4) consider undertaking pollution prevention measures.

The FY 2022/23 TRLL indicates that only CBOD₅ exceeds the action triggering threshold. CBOD₅ is a conventional pollutant whose allowable loadings are more influenced by OC San's treatment plant performance than by IU contributions. Importantly, CBOD₅ does not pose a risk of Pass Through to OC San, as OC San consistently maintains excellent treatment performance, ensuring reliable and proper treatment of CBOD₅ to meet its NPDES discharge limits. Throughout FY 2022/23, OC San consistently achieved Federal Secondary Treatment Standard for CBOD₅ with monthly effluent concentration ranging from 6.5 mg/L to 13.8 mg/L and weekly effluent concentration ranging from 5.7 mg/L to 18.6 mg/L, significantly lower than the 30-day average limit of 25 mg/L and the 7-day average limit of 40 mg/L.² Additionally, the 30-day average influent removal efficiency for CBOD₅ ranged from 94% to 97%, well above the minimum requirement of 85%.¹ For all other pollutants of concern, the local limits seem to be adequately protective of the OC San's POTW, its workers, reclamation opportunities, and the environment.

Pursuant to 40 CFR 122.44(j)(2)(ii), federal regulations require a written technical evaluation of the existing local limits following each permit issuance or re-issuance. In accordance with OC San's NPDES permit (issued August 2021) and now that the GWRS Final Expansion is complete, OC San has commenced its next TELL project which will provide contemporary technical support for OC San's Local Limits.

6.11 Significant Changes in Operating the Pretreatment Program

There were no significant changes to the OC San Pretreatment Program during FY 2023/24.

² Order No. R8-2021-0010/NPDES No. CA0110604 – Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for Orange County Sanitation District Publicly Owned Treatment Works (Reclamation Plant No. 1, Treatment Plant No. 2, Collection System, and Outfalls)

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 2023/24, Section 7.3 presents information on IRWD for FY 2023/24, and Section 7.4 presents information on SAWPA for FY 2023/24.

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 County³ entered into a flow accommodation agreement by which each district agreed to receive wastewater from the other district, where the wastewater originated in one district's service area and discharged into the other district's sewerage system. The geographic areas subject to the agreement are located along the Los Angeles County-Orange County boundary and are characterized by the fact that they are physically isolated from the sewer system of their respective district's jurisdiction by Coyote Creek. The districts entered into subsequent flow accommodation agreements for the 2010/11 and 2011/12 fiscal years. A current agreement was approved by the Board of Directors of both LACSD and OC San on July 1, 2012.

The flow accommodation agreement is fee-based, focusing primarily on residential parcels and flows. For the few industrial dischargers, the fees are based on flow, biochemical oxygen demand, chemical oxygen demand, and suspended solids. The originating district is responsible for administering and enforcing its industrial waste pretreatment program for industries in its service area, with terms and conditions of coordination and information exchange between the districts.

OC San has no industrial facilities discharging to LACSD. LACSD has four noncategorical permittees discharging to OC San, including Chemetall Oakite Corp., Coyle Reproductions, Inc., RockTenn CP, LLC, and T. Hasegawa USA Inc.

³ 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.

7.3 Irvine Ranch Water District (IRWD)

IRWD is a California Water District in central Orange County, California, which is served by several Revenue Zones within the jurisdiction of OC San and other agencies. The northern and coastal parts of IRWD are served by OC San. The pretreatment program in these sections is managed by OC San. A small portion of the eastern part of IRWD, called Portola Hills, is currently sewered to Santa Margarita Water District, a member of the South Orange County Wastewater Authority (SOCWA). SOCWA administers the pretreatment program for its member agencies.

On January 1, 2001, the Los Alisos Water District (LAWD) consolidated with IRWD. LAWD owned and operated a 5.5-million-gallon-per-day (MGD) water recycling plant (Los Alisos Water Reclamation Plant (LAWRP)) whose tertiary effluent is used under permits granted by both Region 8 and Region 9 Water Quality Control Boards. Secondary wastewater effluent up to 7.5 MGD that is not recycled is discharged to the Aliso Creek Ocean Outfall in Laguna Beach. IRWD also uses its capacity in the Aliso Creek Ocean Outfall to dispose of brine from the Irvine Desalter and treated groundwater from its Shallow Groundwater Unit facility. SOCWA administers the pretreatment program for discharges to the ocean outfall.

Most of IRWD is in OC San's service area, which collects sewage for treatment at either IRWD's Michelson Water Recycling Plant (MWRP) or OC San's Reclamation Plant No. 1. Currently, most of the sewage generated within OC San's Revenue Zone No. 14 is treated at MWRP, which is a tertiary treatment plant with a design capacity of 28 MGD. MWRP's highly treated effluent meets the State of California Title 22 regulations for the reuse of recycled water. During calendar year 2021, IRWD began to process all biosolids produced at MWRP. 100% of MWRP biosolids were treated and recycled at the MWRP Biosolids and Energy Facility during the 2023-2024 fiscal year.

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

On June 19, 2015, the Santa Ana Regional Water Quality Control Board (Regional Board) adopted Order No. R8-2015-0024, superseding Order No. R8-2007-0003. The Monitoring and Reporting Program under Order No. R8-2015-0024 requires an annual full priority pollutant scan, with quarterly samples analyzed for those pollutants that were detected in the annual scan. Additional Biosolids and Sludge monitoring is performed by IRWD.

IRWD organic priority pollutant analyses for influent, effluent, and sludge are provided following the narrative. IRWD has scheduled priority pollutant monitoring more frequently than required by permit to provide additional information to OC San on the quality of wastewater and sludge in Revenue Zone 14. IRWD will continue to monitor the influent, effluent, and sludge quarterly.

On September 7, 2018, the Regional Board adopted Order No. R8-2018-0070, amending Order No. R8-2015-0024, allowing for discharges to San Diego Creek under emergency conditions. IRWD Master Reclamation Permit is in administrative extension since IRWD submitted a timely permit renewal application.

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 and effluent 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.

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 and effluent 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

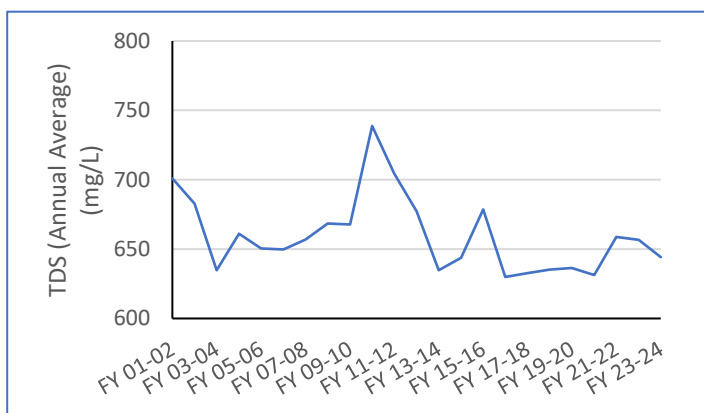


Figure 7-1 MWRP Effluent Total Dissolved Solids (Annual Average)
Irvine Ranch Water District Michaelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

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 2023/24, PTP operation has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 15,634 tons. For FY 2023/24, the Wells 21/22 Desalter has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 1,719 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 178 mg/L during 2023/24. The effect of providing higher quality domestic water can be seen in the gradual reduction in TDS of the recycled water over the last six years as well as compliance with the TDS Limit.

Total Heavy Metals and Total Cyanide

IRWD has been analyzing the heavy metals and total cyanide on the list of inorganic priority pollutants for the last 40 years at MWRP. During the 40-year period, the total mass of heavy metals and cyanide has increased from 5 pounds per day (lb/day) to the current 42.09 lbs/day in the influent, a 19.5% decrease compared to the previous year, and has increased in the effluent from 8.87 to the current 10.18 lb/day in 2023/24, a decrease of 14.8% from the previous fiscal year.

Of all the priority pollutant heavy metals, copper and zinc were found in significantly greater concentrations than remaining metals. The sum of mass of copper and zinc represents 80% of heavy metals found in the influent and represents 91% of what is found in the effluent, with zinc being the overall heavy metal contributor at both sampling locations. IRWD analyzes metals by ICP-MS which is capable of reporting metals in the sub part per billion range. Figure 7-2 shows the annual mass of total heavy metals and total cyanide in the influent and effluent of MWRP.

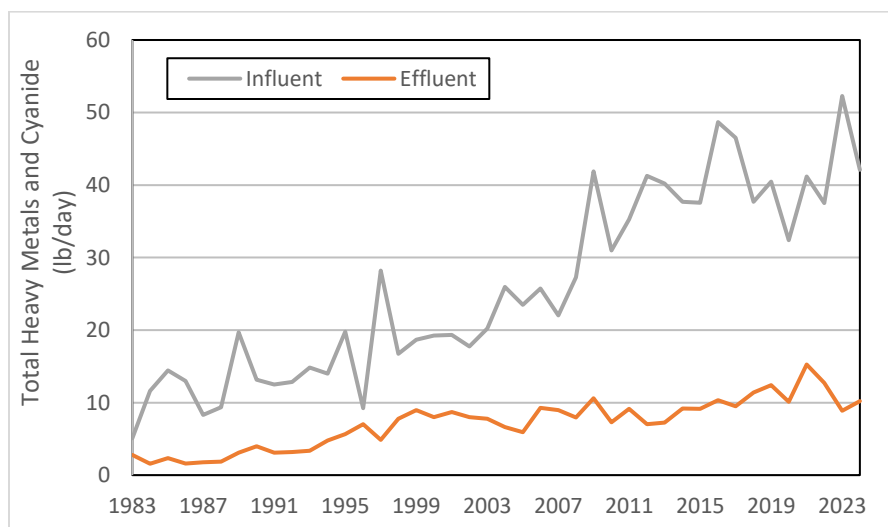


Figure 7-2 MWRP Influent and Effluent Total Heavy Metals and Cyanide
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Copper

The major source of copper is the common use of copper piping in domestic water systems and the printed circuit board industry. Both residential and nonresidential water plumbing are predominantly copper. Currently, IRWD does not have printed circuit board manufacturing in the MWRP service area, which is otherwise another common source of copper. The major commercial source of copper is believed to be radiator repair; however, copper from radiator repair activities is declining since many of the newer radiators are made from aluminum and plastic. Growth in the area tributary to MWRP has begun to increase over the last few years and the increase in the amount of copper being discharged could potentially be from new copper plumbing.

Figure 7-3 shows that the mass of copper in the influent has increased over the 40-year period from 3.5 to 9.14 lbs./day, while the effluent decreased to 1.03 lb/day during the 2023/24 fiscal year. The mass of copper entering the treatment plant in 2023/2024 decreased by 36.1% from the 2022/2023 daily average. The mass of copper in the effluent increased from 0.65 to 1.03 lb/day, an increase of 56.9% from the previous fiscal year.

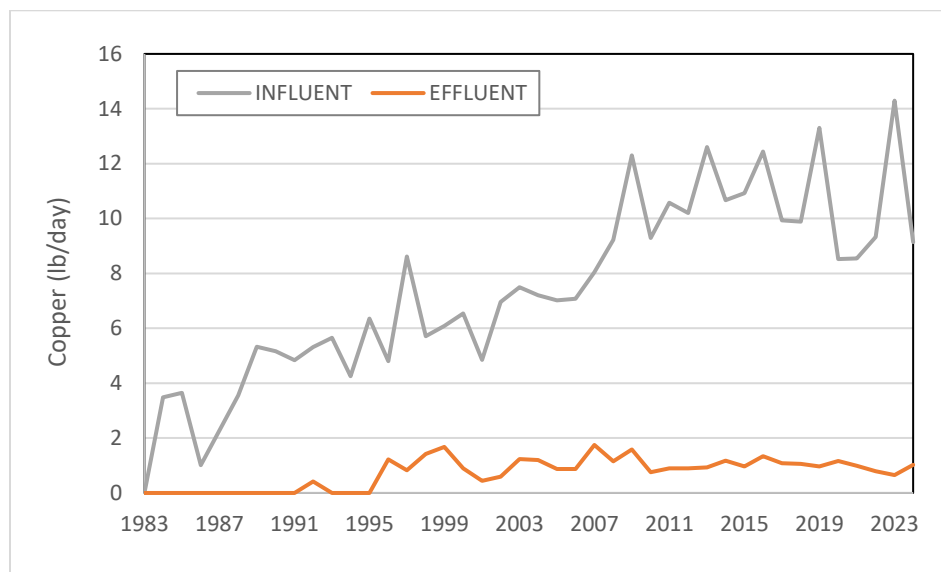


Figure 7-3 MWRP Influent and Effluent Copper
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Zinc

Zinc is the predominant heavy metal detected in both the influent and effluent. The major sources of zinc are brass alloys used in domestic water systems, water and oil-based paints used by the building industry, and in chemicals and coatings used by industry. The concurrent increase of zinc in the influent with copper suggest this is associated with residential building growth using copper and zinc piping and fixtures. Figure 7-4 shows that the mass of zinc in the influent has increased from 4.6 lb/day to 24.46 lb/day over 40 years. The influent mass of zinc decreased by 3.18 lb/day or a 11.5% decrease from the previous fiscal year. The mass of zinc in the effluent has increased from 1 lb/day to 8.24 lb/day over the last 40 years. The effluent mass of zinc saw an increase of 1.12 lb/day, or a 15.7% increase, from the previous fiscal year.

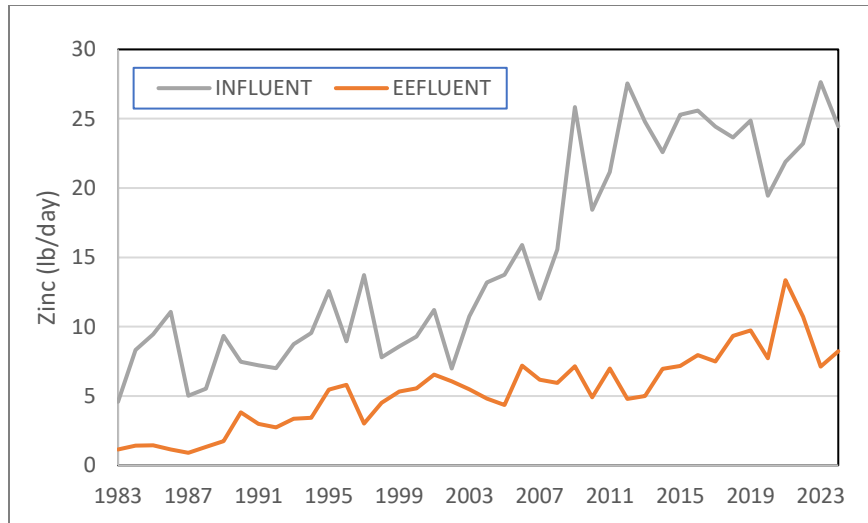


Figure 7-4 MWRP Influent and Effluent Zinc
Irvine Ranch Water Department – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

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 and effluent. Figure 7-5 shows the annual mass of total organic pollutants in the influent and effluent of MWRP. Over the last 40 years, the annual mass of total organic pollutants entering MWRP has widely varied and has decreased from a high of 16.82 lbs/day to the current 1.324 lbs/day. The mass of total organic priority pollutants leaving MWRP increased from 20.936 lbs/day in 2022/2023 to 24.768 lbs/day this fiscal year. The general increase in effluent organic pollutants above influent levels is attributed to an increase in trihalomethanes and other volatile organic compounds resulting from final effluent chlorination required to meet California Title 22 Water Recycling Criteria.

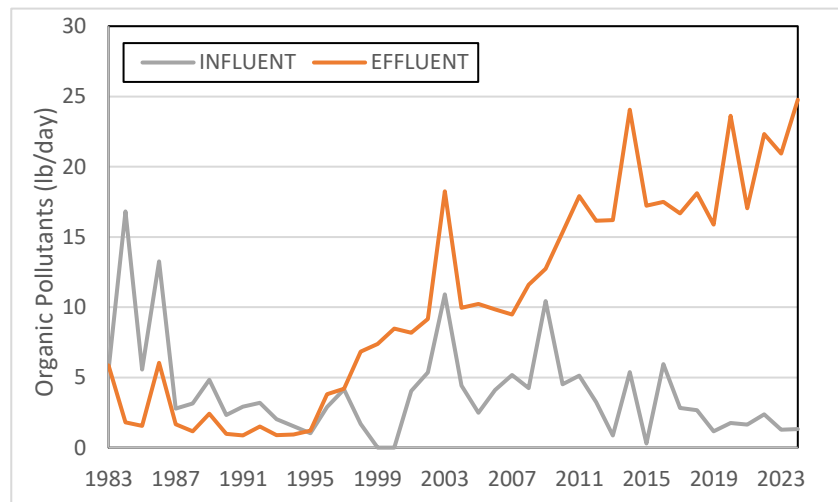


Figure 7-5 MWRP Influent and Effluent Organic Pollutants
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

IRWD has completed its 10 MGD biological nitrogen removal membrane filtration plant expansion at the MWRP and the plant is now operating within its design capacity. The UV Disinfection system went online November 2015 and the effluent total toxic organics concentration and mass has been reduced as the concentration of trihalomethanes and other volatile organic compounds resulting from effluent chlorination has been reduced.

Report of Upset, Pass-Through and Interference Events

The discharger shall submit annually... a discussion of upset, interference, or pass-through incidents, if any, at the POTW which the discharger knows or suspects were caused by industrial users of the POTW system...

There were no upsets, interference or pass-through incidents caused by industrial users during the reporting period.

7.3.5 Discussion of the List of Industrial Users

The discharger shall submit annually... an updated list of the discharger's significant industrial users...

Table 7.1 summarizes those companies in Revenue Zones Nos. 7 and 14 which were under permit and in business as of June 30, 2023. Class I industrial users in Revenue Zone 7 discharge to the IRWD collection system and are treated at OC San's treatment plant. Class I industrial users in Revenue Zone 14 discharge to the IRWD collection system and are treated at MWRP and at OC San's treatment plant.

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District – 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
1-571332	Avid Bioservices, Inc.	14191 Myford Road (Tustin)	325414	Biological Product (except Diagnostic) Manufacturing	IRWD
1-071054	B. Braun Medical, Inc. (East/Main)	2525 Mcgaw Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-600382	B. Braun Medical, Inc. (North/Alton)	2206 Alton Parkway (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-541183	B. Braun Medical, Inc. (West/Lake)	2525 Mcgaw Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-601616	Bioduro LLC (Fairbanks)	72 Fairbanks (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-601617	Bioduro LLC (Jeronimo)	9601 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-600583	Brothers International Desserts (North)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600582	Brothers International Desserts (West)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600920	CP-Carrillo, Inc. (Armstrong)	17401 Armstrong Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-571316	CP-Carrillo, Inc. (McGaw)	1902 McGaw Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-071162	Electrolurgy, Inc.	1121 Duryea Ave. (Irvine)	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	OC San
1-600585	FMH Aerospace Corp.	17072 Daimler St. (Irvine)	332912	Fluid Power Valve and Hose Fitting Manufacturing	OC San

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-571314	Graphic Packaging International, Inc.	1600 Barranca Parkway (Irvine)	322212	Folding Paperboard Box Manufacturing	OC San
1-541178	Imuraya USA, Inc.	2502 Barranca Parkway (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-571327	Irvine Ranch Water District (Wells 21/22 Desalter)	1221 Edinger Avenue (Tustin)	221310	Water Supply and Irrigation Systems	OC San
1-601134	IsoTis OrthoBiologics, Inc.	2 Goodyear (Irvine)	339112	Surgical and Medical Instrument Manufacturing	IRWD
1-071056	Kraft Heinz Company	2450 White Road (Irvine)	311941	Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing	OC San
1-601313	LGM Subsidiary Holdings LLC	17802 Gillette Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-071024	Maruchan, Inc. (Deere)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-601021	Maruchan, Inc. (Deere-South)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-141015	Maruchan, Inc. (Laguna Cyn)	15800 Laguna Canyon Road (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	IRWD
1-141023	Marukome USA, Inc.	17132 Pullman St. (Irvine)	311991	Perishable Prepared Food Manufacturing	OC San
1-601843	Meggitt (Orange County), Inc.	4 Marconi (Irvine)	334519	Other Measuring and Controlling Device Manufacturing	IRWD
1-071038	Newport Corporation	1791 Deere Ave. (Irvine)	334516	Analytical Laboratory Instrument Manufacturing	OC San
1-141012	Oakley, Inc.	1 Icon (Foothill Ranch)	339115	Ophthalmic Goods Manufacturing	IRWD
1-071235	Prudential Overall Supply	16901 Aston St. (Irvine)	812332	Industrial Launderers	OC San
1-571303	Rayne Dealership Corporation	17835 Sky Park Circle Suite M (Irvine)	454390	Other Direct Selling Establishments	OC San
1-600297	Shur-Lok Company	2541 White Road (Irvine)	332721	Precision Turned Product Manufacturing	OC San
1-600565	South Coast Baking, LLC	1711 Kettering St. (Irvine)	311821	Cookie and Cracker Manufacturing	OC San
1-141163	Tropitone Furniture Co., Inc.	5 Marconi (Irvine)	337124	Metal Household Furniture Manufacturing	IRWD
1-600010	Vit-Best Nutrition, Inc.	2832 Dow Ave. (Tustin)	325412	Pharmaceutical Preparation Manufacturing	IRWD

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-601581	Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	16122 Construction CircleWest (Irvine)	562212	Solid Waste Landfill	OC San

7.3.6 Discussion of Industrial User Compliance Status

The discharger shall submit annually... a list or table characterizing the industrial compliance status of each SIU...

The compliance status of each noncompliant SIU is shown in OC San’s Pretreatment Program Annual Report.

7.3.7 Summary of SIU Compliance

The District shall submit annually... a compliance summary table...

A summary of compliance is shown in OC San’s Pretreatment Program Annual Report.

7.3.8 Discussion of Significant Changes in the Pretreatment Program

The District shall submit annually... a short description of any significant changes in operating the pretreatment program which differ from the previous year...

There were no significant changes in operating the pretreatment program between the 2021/22 and 2022/23 fiscal years.

7.3.9 Pretreatment Program Costs

The District shall submit annually... a summary of the annual pretreatment budget and the pretreatment equipment purchases.

A financial summary of IRWD’s pretreatment program is shown in Table 7.2. All the expenses shown 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, 2022 – 2023 and 2023 – 2024 Orange County Sanitation District – IRWD			
Project No.	Description	2022 – 2023 Labor	2023 – 2024 Labor
3093	Quarterly PP	\$105.49	\$329.30
3094	Baseline PP	\$0	\$0
3095	PP Surveillance	\$0	\$0
3096	Compat. Surveillance	\$0	\$0
3098	Industry Info. Collection	\$39,489	\$50,812
3099	Eval. Data/Reports	\$0	\$0
3100	OC San/SOCWA	\$0	\$0
Total		\$39,595	\$51,141

IRWD records expenses based on project numbers which represent specific activities or groups of related activities. During fiscal year 2023/24, IRWD spent \$51,141 on the operation of its pretreatment program, which is an increase of \$11,546 from the previous year.

7.3.10 Equipment Purchases for FY 2023 – 2024

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 2023-2024 Orange County Sanitation District – IRWD	
Quantity	Description
1	Ford Ranger
4	Sigma AS 950 portable compact auto samplers with pH
1	Sigma 900 Max insulated auto sampler with conductivity and pH
1	Sigma SD 900 insulated auto sampler
3	Sigma compact insulated auto sampler base (spare base) – 24 bottle configuration
3	Sigma large insulated auto sampler base – 24 bottle configuration
2	Sigma large insulated auto sampler base – 12 bottle configuration
6	Sigma lead-acid gel battery
3	Sigma battery charger, 5 stations
2	Sigma data transfer unit (DTU) and software
2	USB flash drive
1	Digital pH probe
1	Analog pH probe
1	Manhole Cover Hook
2	Analog electrical conductivity probe
1	MSA gas detector

7.3.11 Discussion of Public Participation Activities

The District shall submit annually... a summary of public participation activities...

IRWD has a standing program of MWRP tours, where the public is instructed on the sewage collection and treatment, as well as proper hazardous waste disposal practices. The Water 101 course and tour includes drinking and recycled waters as well as wastewater treatment. As an operator of a sewage collection system, IRWD is enrolled under the statewide general permit to manage fats, oils, and grease discharges from food service establishments. The public participation program is administered by IRWD staff with contractor support.

7.3.12 Discussion of Biosolids Treatment and Recycling Activities

The District shall submit annually... a description of any changes in sludge disposal methods...

IRWD began construction in October 2013 of its Biosolids and Resource Recovery Project, that consists of solids thickening, acid-phase anaerobic digestion, dewatering, drying/pelletizing, energy generation using microturbines, and use of pellets as a fertilizer or e-fuel. The project is currently in the commissioning phase, and once completed IRWD will only send solids to OC San for treatment as required. In fiscal year 2023/2024 IRWD was treating all its wastewater solids onsite in the Biosolids Facility producing Class B and Class A (pellets) biosolids.

7.3.13 IRWD Additional Information

The District shall submit annually... any concerns not described elsewhere in the report.

Michelson Water Recycling Plant Flow

Figure 7-6 shows the wastewater flow received by MWRP over the last 40 years. MWRP flow has generally increased over the years with a few exceptions. Average flow for the 2023/24 fiscal year was 20.73 MGD which was a 1.9% increase from the previous fiscal year. The decrease in influent flow in previous years may be attributed to the abnormally wet winters, where IRWD had to divert sewage at a higher volume than normal from MWRP to OC San for treatment. FY 23/24 was also a wet winter year, but to a lesser degree than the previous year.

Nitrification/Denitrification Facilities

IRWD completed a significant upgrade to MWRP by installing a nitrification/denitrification system on its activated sludge system in the 1998-99 fiscal year. Plant effluent is now fully nitrified year-round and substantially denitrified during the months when recycled water is stored in IRWD open storage reservoirs. A fully nitrified effluent means that IRWD maintains a free chlorine residual rather than a combined chlorine residual. A free chlorine residual causes a greater formation of trihalomethanes and related volatile organic compounds, which is evident by the presence of total toxic organic compounds in the effluent. Fortunately, the quality of plant effluent, detention time in the plant, and short time before storage or use, keeps the level of toxic organic compounds below regulatory criteria, even though a relatively high chlorine dose is required to maintain bacterial quality. The operation of the nitrification/denitrification system has improved activated sludge operations, which in turn, has increased the quality of recycled water.

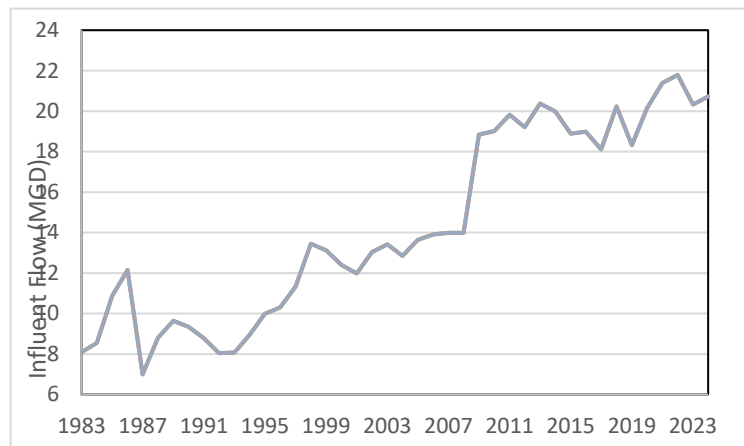


Figure 7-6 MWRP Influent Flow
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Industrial Parks Development Status

Since the early 1980s, MWRP has been receiving increased industrial wastewater flows from the Irvine Spectrum. The industrial parks located with IRWD's service area are primarily the Irvine Spectrum, a large industrial park located near the former El Toro Marine Corps Air Station and the Foothill Ranch industrial area, located north and east of the El Toro Marine Corps Air Station. The El Toro Marine Corps Air Station is decommissioned and will be the site of the Great Park Development, a master planned community. IRWD sees the potential for gradually increasing levels of organic pollutants and heavy metals as the Irvine Spectrum industrial park and Foothill Ranch sites continue to expand and develop. The University of California, Irvine is expanding the University Research Park located on the southern portion of the university. IRWD sees a potential for organic priority pollutant and heavy metal discharges from the industrial/research parks.

Stormwater, Deminimis Discharges and Selenium

In May 2009, the Regional Board adopted the fourth term *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and Incorporated Cities of Orange County Within the Santa Ana Region Areawide Stormwater Runoff Orange County, Order R8-2009-0030*. A condition of this permit is a requirement that non-stormwater discharges be prohibited from discharge into the storm drain except for urban runoff and certain authorized non-stormwater discharges. As a result, there has been an increase of non-wastewater discharges into the sewer system. In general, these discharges contribute to the hydraulic loading to the sewer system and have not been a significant source of conventional and other pollutants.

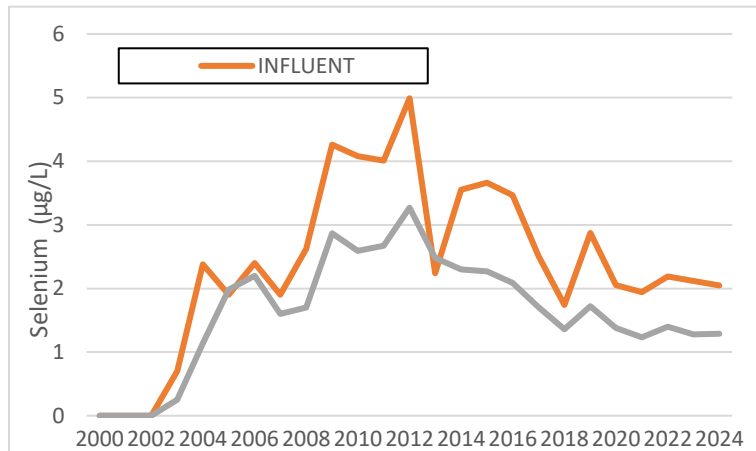


Figure 7-7 MWRP Influent and Effluent Selenium
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

The northeastern side of the Irvine Basin is dominated by coastal foothills, and historically runoff from the foothills deposited in a seasonal marsh called the Cienega de las Ranas. Natural weathering of the coastal foothills has exposed and eroded the Monterey Formation containing significant amounts of selenium, which over time have accumulated in the seasonal marsh. In addition to runoff, rising groundwater in the area of the seasonal marsh has raised the concentration of selenium in surface water well above the California Toxics Rule criterion of 5 µg/L. The seasonal marsh has been drained, first to promote agriculture, and then the agricultural land has been converted into urban development. Surface waters in the watershed are listed on the Section 303(d) list for selenium impairment, and discharges of water into the surface water system above 5 µg/L are regulated under the Basin Plan.

The effect of the additional prohibition of non-stormwater discharging into the storm drain system has resulted in additional non-stormwater flows being discharged into the sewer system containing significant levels of selenium from groundwater dewatering operations. Some of the discharges are tributary to OC San’s sewer system, and the selenium is ultimately returned to the ocean. However, some of the discharges are tributary to the IRWD sewer system. IRWD has been tracking the fate and transport of selenium since 2002 to garner knowledge on the effect of the additional non-stormwater discharges on MWRP effluent quality. During this last fiscal year, the average effluent selenium concentration was approximately 1.28 µg/L, below the California Toxics Rule criterion. Prior to 2002, the concentration of selenium in the wastewater was negligible, because there was no selenium in the domestic water supply, there were no industries discharging selenium and non-wastewater discharges into the sewer system were prohibited. Because selenium toxicity is based on concentration, IRWD will continue to monitor the concentration of selenium in the influent and effluent from the MWRP.

IRWD Oversight Activities

IRWD has monitored four major trunklines within its service area for priority pollutants. Commercial, residential and industrial areas were monitored on an annual basis. One purpose of this monitoring is to establish a long-term history of priority pollutant discharges into the sewer system. Phthalates are used to maintain flexibility in plastic products and are commonly found. The low concentrations of these constituents are common and are considered emerging pollutants of concern.

Additionally, within the IRWD service area, industrial activities are regulated by the City of Irvine General Plan and Zoning Ordinances, which confines industrial uses to specific zones and the City of Lake Forest, which is the agency currently responsible for the Foothill Ranch Master Plan. Currently, IRWD is reassessing its monitoring programs and locations.

The IRWD service area encompasses the San Diego Creek watershed, the largest watershed that is tributary to Newport Bay. Newport Bay and its tributary watersheds are subject to Total Maximum Daily Load (TMDL) allocations for sediment, nutrients, pathogens, and toxics. IRWD does not discharge wastewater into surface waters, other than its open storage reservoirs; however, as the sole purveyor of water and recycled water in the watershed, IRWD has chosen to become involved with water quality management in the watershed. IRWD is constructing and managing wetlands, under the Natural Treatment Systems Project, which will remove pollutants of concern to the TMDL allocations. IRWD extends its services to assist commercial and industrial users to recognize the importance of site runoff water quality, point out sources of contamination and areas of potential contamination, and advice on corrective measures.

Local Limits Study

Due to the completion of IRWD's Phase II Expansion at MWRP, as well as the construction of a solids and biosolids handling facility, IRWD decided to undertake a technical evaluation of its local limits that began in 2016, and was completed and submitted to the Regional Board for their approval in October 2016. The local limits study evaluated if IRWD's current limits are protective of not only the new unit processes within IRWD but were also protective enough to ensure that IRWD can produce Class A exceptional quality biosolids, as well as potentially evaluate additional pollutants of concern. IRWD received approval of its local limits by the Regional Board in 2018 and has had them adopted by IRWD's Board of Directors in May 2018. IRWD staff expect to conduct the next Local Limits Study during the next permit cycle, which is currently pending renewal.

7.4 Santa Ana Watershed Project Authority (SAWPA)

Orange County Sanitation District (OC San) has a National Pollutant Discharge Elimination System (NPDES) permit for ocean discharge and is the Control Authority for the Pretreatment Program required by federal regulations. Because SAWPA discharges to OC San through the SARI Line, SAWPA is subject to OC San's Pretreatment Program. Through a 1991 Memorandum of Understanding (1991 MOU), OC San enabled SAWPA to be OC San's Delegated Control Authority for the Pretreatment Program in SAWPA's SARI Service Area. SAWPA's responsibilities to run a Pretreatment Program on behalf of OC San, ability to discharge to the SARI Line, and other financial factors are governed by agreements between OC San and SAWPA, including the 1991 MOU and a 1996 Wastewater Treatment and Disposal Agreement (1996 Agreement), as amended and succeeded. OC San routinely reviews all SAWPA Commission, Commission Workshop, and Project Agreement meeting agendas and minutes to stay current with the activities in the SAWPA area that may have an impact on the SAWPA Pretreatment Program. In addition, OC San routinely meets with SAWPA to coordinate at administrative, technical, management, and leadership levels with varying levels of staff in attendance at each meeting to improve the coordination between OC San's and SAWPA's Pretreatment Programs and to enhance the working relationship with SAWPA in all areas of the 1991 MOU and 1996 Agreement.

SAWPA was formed in 1968 to develop a long-range plan for managing, preserving, and protecting the quality of water supplies in the Santa Ana Basin. SAWPA is a Joint Powers Authority (JPA) consisting of five agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western Water). SAWPA's program in water quality management is integrated with those of other local, state, and federal agencies.

The Inland Empire Brine Line (Brine Line) is a pipeline that is designed to carry saline wastewater from the Upper Basin to 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 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 MGD per day (MGD). For the 12-month period from July 1, 2023, through June 30, 2024, a total of 4,497 MGD was discharged into the Brine Line, for an average of 12.32 MGD.

7.4.1 Brine Line System Pretreatment Program Overview

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

SAWPA owns and operates the Brine Line above or upstream of the Orange County line and has purchased 17 MGD of treatment and disposal capacity rights at OC San's treatment facilities. SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to Direct and Indirect Dischargers jointly with Member and Contract Agencies and solely issues permits to all Member and Contract Agency owned or affiliated Direct and Indirect Dischargers. In addition, SAWPA has the Permitting responsibilities for all Liquid Waste Haulers (LWH) that use the four SAWPA-approved Collection Stations. The SAWPA LWH permits assign, for each discharger, a primary collection station and alternate collection stations should the primary collection station become unavailable due to repairs or closure.

Agency staff assists in the conduct of the program for non-agency permittees within their service area. SAWPA conducts all pretreatment oversight activities for agency-owned or affiliated permittees. SAWPA has identified, categorized, and summarized the permits herein by geographical location and support from the Member and Contract Agencies. Roles and responsibilities are defined in SAWPA's policies and procedures. SAWPA has two dedicated full-time pretreatment personnel and an additional 0.7 full-time equivalent (FTE) to assist with pretreatment responsibilities. Combined, the 2.7 FTE, along with additional personnel from both Member and Contract Agencies, prepared and issued permits, conducted inspections, prepared enforcement actions, and prepared monthly, quarterly, and annual reports by the date required.

During the reporting period SAWPA continued implementation of numerous program documents and worked to improve the operation and implementation of the Pretreatment Program. SAWPA and the Member and Contract Agencies use Pretreatment Program Control Documents (PPCDs) for uniform and consistent implementation of the Pretreatment Program. A Data Management System (IPACS) continued to be used.

The reporting below is individually presented for each SAWPA Pretreatment Program Member and Contract Agency.

7.4.2 SAWPA, Member Agency, and Contract Agency Pretreatment Programs

7.4.2.1 The City of Beaumont (Beaumont)

Description of Beaumont

Beaumont is the owner and operator of the City of Beaumont wastewater treatment plant and will be responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area upon its connection to the Brine Line in 2020. Beaumont has been required by the Santa Ana Regional Water Quality Control Board to proactively manage salinity in the two underlying groundwater basins, the Beaumont and San Timoteo Groundwater Management Zones. As a result, Beaumont has installed a Reverse Osmosis (RO) treatment of the tertiary treated wastewater treatment plant effluent. The RO concentrate is discharged to the Brine Line. The Beaumont wastewater treatment plant discharges to Cooper's Creek, tributary to San Timoteo Creek, which is tributary to the Santa Ana River. By discharging the brine concentrate to the Brine Line, discharge of a minimum 685 tons of salt to the Santa Ana River are avoided, benefiting the downstream groundwater basins. Currently there are no permitted users within the Beaumont Service Area.

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

Enforcement Actions

There was no enforcement action during this reporting period.

7.4.2.2 Eastern Municipal Water District (EMWD)

Description of EMWD

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

Enforcement Action

There was no enforcement action during this reporting period.

7.4.2.3 Inland Empire Utilities Agency (IEUA)

Description of IEUA

IEUA is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries located within IEUA's service area. IEUA, originally named the Chino Basin Municipal Water District (CBMWD), was formed in 1950 to supply supplemental water to the region. Since its formation, IEUA has expanded its areas of responsibility from a supplemental water supplier to a regional wastewater treatment agency with domestic and industrial disposal systems and energy recovery/production facilities. In addition, IEUA has become a recycled water purveyor, bio-solids/fertilizer treatment provider and continues as a leader in water supply salt management, for the purpose of protecting the region's vital groundwater supplies.

IEUA strives to enhance the quality of life in the Inland Empire by providing optimum water resources management for the area's customers while promoting conservation and environmental protection. IEUA covers 242-square miles, distributes imported water, provides industrial/municipal wastewater collection and treatment services, and other related utility services to more than 875,000 people. IEUA's service area includes the Cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, as well as the Cucamonga Valley Water District.

Enforcement Actions

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

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

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

In-N-Out Burger, Chino Distribution Center owns and operates a facility which processes meat and produces spread/sauces, and the facility also serves as a distribution center. The facility also operates an ion exchange system and a cooling tower, resulting in a high TDS discharge to the Brine Line. The pretreatment equipment for this facility includes: the wastewater treatment system influent pump station; rotary drum screen; screened influent holding tank; screened influent pump skid; 30,000-gallon wastewater gallon equalization tank; static mixer; polymer blending station; flocculation skid; dissolved air flotation system; sludge tank; brine wastewater pump station; 20,000 gallon wastewater equalization tank; pH

compliance probe; and effluent flow meter. A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on August 2, 2023, following permitted flow rate and BMP violations. On July 14, 2023, the permittee notified IEUA that it had exceeded its permitted flow rate limit of 60 gpm on July 12 and July 13, 2023. The average instantaneous flow rate on these days was calculated to be 65 gpm and 69 gpm, respectively. On July 18 2023, IEUA inspectors also noted standing wastewater on the floor in the pretreatment building, excessive amounts of solids/sludge and wastewater level above the channel in the manhole structure located outside of the pretreatment building and that the effluent flow reading displayed 60.5 gpm, which are violations of permitted BMP requirements as well as the instantaneous flow rate of 60 gpm. Furthermore, on August 3, 2023, the permittee notified IEUA that it had again exceeded its gpm flow rate limit of 60 gpm on July 17, 2023. The average instantaneous flow rate was calculated to be 61.9 gpm. The NOV/OCA required the permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of flow rate and BMP violations by no later than August 10, 2023. Furthermore, the permittee was required to submit a compliance schedule that required acceptance by the Control Authorities by no later than August 31, 2023. The permittee responded on August 8, 2023, stating that during testing of its CIP systems, excess water was discharged simultaneously which caused flow exceedances. The permittee confirmed that under normal operations this cannot occur and was a byproduct of the testing of the system. On August 31, 2023, the permittee submitted a compliance schedule along with an updated response. The permittee reported that it would need additional capacity and arranged to purchase two additional capacity units. Permittee stated it had also installed a flex coupling on the brine tank discharge pipe to prevent spillage onto the treatment building floor and that the manhole cover located just upstream of the flow meter is now locked down to prevent spillage. These changes were confirmed during a site inspection on August 31, 2023. The permittee also stated that it has optimized the DAF efficiency to better remove solid material from its wastewater. Furthermore, the permittee is measuring and recording final discharge tank level each hour, which will enable them to use PSI reading to monitor flow leaving the tank. The permittee stated it is receiving alerts via its Building Management System of any wastewater issues within its warehouse and has adjusted its discharge set point alarm, so it alarms at 5 gpm under the current limit. On September 20, 2023, the purchase of additional capacity by the permittee was approved by the IEUA Board of Directors which increased their daily discharge rate to 90 GPM or 129,690 gpd. Purchase of the additional capacity ensured compliance with the permit limits as required. Enforcement closed on September 21, 2023. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at In-N-Out Burger, Chino Distribution Center to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

Repet, Inc. (Permit No. D1069-6)

Repet, Inc. owns and/or operates a facility which processes used plastic bottles into clean plastic flakes. Wastewater discharged to the Brine Line is produced by shredding, grinding, and cleaning plastic bottles into flakes, boiler blowdown, and compressor condensate. The pretreatment equipment for this facility includes cone settling tanks, single shaker screen, self-cleaning filters, centrifuge, settling tanks, flow equalization tank, coagulant and polymer injection, Gas Energy Mixing, and storage tanks. On May 28, 2024, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Repet, Inc. for a pollutant discharge violation. On April 9, 2024, IEUA collected a wastewater sample from Monitoring Point 001. The laboratory chemical analysis results received on May 14, 2024, indicated an Oil & Grease, Non-Polar (O&G-NP) concentration of 97 mg/L, which exceeded the daily maximum discharge limitation of 92.8 mg/L as stated in Permit No. D1069-6. The NOV/OCA required the permittee to resample for O&G-NP for three (3) consecutive weeks, provide result of the first sample on or before June 14, 2024, and submit the remaining results within fourteen (14) days of each sampling event. Furthermore, the permittee was required to submit a written report detailing the cause and corrective action taken to prevent recurrence of the violation on or before June 4, 2024. The permittee responded on May 29, 2024, stating it evaluated its current spill prevention and mitigation procedures and verified that all directives for handling spills and waste-oil are being followed. The permittee stated it delved into recent production schedule changes for possible clues as a potential contributing factor to the O&G-NP violation and nothing unusual or out of the ordinary was discovered. Subsequent chemical laboratory analysis results for O&G-NP indicate compliance. Enforcement closed on July 3, 2024. IEUA shall continue to conduct unannounced

inspections and wastewater monitoring at Repet, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.4 Jurupa Community Services District (JCSD)

Description of JCSD

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

Enforcement Action

There was no enforcement action during this reporting period.

7.4.2.5 San Bernardino Municipal Water Department (SBMWD)

Description of SBMWD

SBMWD is a Municipal Water Department and is responsible for administering certain pretreatment program activities for indirect industries associated with the SBMWD Brine Line Collection Station. SBMWD provides potable water and sewerage services for the City of San Bernardino, in addition to sewerage service for the city of Loma Linda, as well as surrounding communities and isolated county areas. These services are augmented by the operation of a brine waste collection station which provides an alternate disposal site for industries which generate high strength brine waste. The SBMWD, under contract with the San Bernardino Valley Municipal Water District, is responsible for administering the pretreatment program associated with the SBMWD Brine Line Collection Station.

Enforcement Action

Inland Water Services (Permit No. I1066-4.1)

Inland Water Services regenerates resin contained in soft water exchange tanks for commercial and residential customers. The wastewater discharged consists of a spent brine solution and process wastewater used to clean and regenerate resin used in commercial and residential exchange tanks. The process wastewater is treated by a copper ion exchange tank system prior to being discharged to the designated brine storage tank. On June 15, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Inland Water Services for a pollutant discharge violation. On May 9, 2023, SBMWD collected a wastewater sample from Monitoring Point 001. The laboratory analysis results received on May 26, 2023, indicated a Copper concentration of 4.8 mg/L, which exceeded the Daily Maximum Discharge Limitation of 3.0 mg/L as stated in Permit No. I1066-4. The NOV/OCA required the permittee to submit a written report detailing the cause of the violation and corrective action taken to prevent recurrence of the violation by no later than June 28, 2023. Permittee responded on June 29, 2023, and attributed the cause of the violation to a missed Copper removal exchange tank change out. The permittee exchanged the Copper removal tanks on June 19, 2023, in response to the NOV/OCA. The permittee stated as a corrective action the exchange tank change out frequency would be increased from once every 5 months to once every 3 months and will be revised to coincide with quarterly sampling during the first week of each quarter. The permittee collected a Copper sample before the exchange tank change out on June 19, 2023, indicating a Copper concentration of 0.146 mg/L. The permittee also collected a Copper sample after the exchange tank change out on June 19, 2023, indicating a Copper concentration of 0.0895 mg/L. The permittee stated that both Copper sample results show compliance with the Daily Maximum Discharge

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

7.4.2.6 San Bernardino Valley Municipal Water District (Valley District)

Description of Valley District

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

Enforcement Action

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

Rialto Bioenergy Facility, LLC operates a facility which produces renewable energy from processing a combination of food waste extracted from food waste streams, liquid waste, and municipal biosolids, and biogas captured from an adjacent Wastewater Treatment Plant. The following equipment treats all wastewater flows from the treated digester effluent and air dryer condensate: dissolved air flotation, flow equalization, centrifuge, drum screen, dissolved air flotation, polymer system, continuous pH monitoring, and continuous flow measurement. Two separate enforcement actions were issued during the reporting period for pollutant discharge violations as well as reporting violations. On June 9 and 10, 2023, the permittee collected self-monitoring samples for the daily sampling period of June 1, 2023, to June 30, 2023, from Monitoring Point 001 as required by Permit No. D1130-2. The results of analysis from these samples were reported on August 1, 2023, a violation of the required submittal date of July 7, 2023, pursuant to Permit No. D1130-2 Section IX. Reporting Requirements, Subsection A. Periodic Compliance Report. On June 22 and 24, 2023, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The laboratory results indicated a BOD concentration of 150 mg/L on June 22nd and 160 mg/L on June 24th, which exceeded the maximum daily discharge limit of 100 mg/L pursuant to Permit No. D1130-2, Section VIII. Special Conditions, subsection I. Daily Monitoring and Reporting Requirements. Furthermore, on July 7, 2023, it was determined that Rialto Bioenergy failed to conduct the required quarterly self-monitoring event during the April 1, 2023, to June 30, 2023, sampling period pursuant to Permit No. D1130-2, Section VI. Effluent Limitation, Table 1 – Discharge Limitation & Monitoring Requirements for Monitoring Point 001. On July 13, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued by Valley District for the aforementioned pollutant discharge violations. Following issuance of the NOV/OCA the additional monitoring and reporting violations, described above, were identified and the enforcement was escalated by SAWPA. On August 8, 2023, a Notice of Violation and Order for Corrective Action (NOV/OCA) and Violation Meeting was issued by SAWPA for failure to monitor and report as required. The NOV/OCA required the Permittee to schedule a Violation Meeting with the Control Authorities by August 18, 2023. The permittee was also required to immediately collect the required quarterly sample and report the results of analysis to SAWPA by no later than August 22, 2023. The permittee was also required to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violations described in each NOV/OCA by no later than August 18, 2023. SAWPA received the required written report on August 15, 2023, and the corrective action outlined was to reroute Cooling Tower washdown into pretreatment, hire a third-party consultant to manage self-monitoring events and extension requests, and decrease coagulant dose rates to reduce system impact. SAWPA received the required quarterly sample and report on August 22, 2023. The corrective actions were

determined to be completed as required during the Valley inspection on August 21, 2023. The Violation Meeting took place on August 31, 2023. During the meeting, SAWPA outlined and discussed violations listed in the two NOV/OCA's and answered questions the Permittee had regarding Permit No. D1130-2. The Permittee outlined its corrective actions as previously described in its Corrective Action report. The enforcement was closed on August 31, 2023. SAWPA and Valley District shall continue to conduct unannounced inspections and wastewater monitoring at Rialto Bioenergy Facility, LLC to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.7 Santa Ana Watershed Project Authority (SAWPA)

Description of SAWPA

SAWPA is a Joint Powers Authority, classified as a Special District under State of California law, responsible for the implementation of the pretreatment program for the industries connected to the Brine Line. SAWPA consists of five Member Agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western Water). SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to Direct and Indirect Dischargers jointly with Member and Contract Agencies and solely issues permits to all Member and Contract Agency owned or affiliated Direct and Indirect Dischargers.

Enforcement Actions

There was no enforcement action during this reporting period.

7.4.2.7.1 SAWPA Waste Hauler Program

SAWPA solely permits the Waste Haulers allowing for the Waste Haulers to have only one permit to provide service to the four Member Agencies' Collection Stations. This also facilitates utilization of the Generator's regular Waste Hauler if an Alternate Collection Station must be used.

Existing Permits – Permitted Waste Haulers

- **Alpha Petroleum Transport, Inc. II (Permit No. H1126-4.3)**
22740 Temescal Canyon Road, Corona, CA 92883
- **Environmental Management Technologies, Inc. (Permit No. H1025-4.11)**
1456 S. Gage Street, San Bernardino, CA 92408
- **Haz Mat Trans, Inc. (Permit No. H1033-4.2)**
230 E. Dumas Street, San Bernardino, CA 92408
- **Inland Water Services (Permit No. H1066-4.1)**
939 West Reece Street, San Bernardino, CA 92411
- **K-VAC Environmental Services, Inc. (Permit No. H1049-4.2)**
8910 Rochester Avenue, Rancho Cucamonga, CA 91730
- **SB Industrial Vacuum Services Inc. (Permit No. H1135-1)**
10656 Jaggery Street, Fontana, CA, 92337
- **Triumvirate Environmental Services, Inc. (Permit No. H1132-2)**
10600 S Painter Ave, Santa Fe Springs, CA, 90670
- **Western Environmental Services, Inc. (Permit No. H1098-4)**
400 W. Foothill Blvd., Suite H, Glendora, CA 91740

Enforcement Action

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

K-Vac Environmental Services, Inc. operates a company which transports wastewater from waste generators, separately permitted, to Inland Empire Brine Line Collection Stations. The Permittee transports the permitted generator's wastewater separately to these Collection Stations. A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on September 28, 2023, following a rejected load attempted to be discharged to the Western Water Collection Station (collection station). On September 5, 2023, at 11:02 am a pH alarm was triggered at the collection station. A City of Corona Operator responded to the alarm by collecting a wastewater sample from the Liquid Waste Hauler truck discharging to the collection station and conducted a field analysis of the sample using a hand-held pH meter. The analysis indicated a pH result of 12.07 S.U., which exceeded the local instantaneous upper limit of 12.0 S.U. as stated in Permit No. H1049-4.1. The operator also determined that three incomplete Liquid Waste Manifest Forms were submitted in August and September 2023 by the Hauler. The NOV/OCA required K-Vac Environmental Services, Inc. to submit a written report to SAWPA detailing the cause and corrective actions taken to prevent a recurrence of the violations by no later than October 5, 2023. On October 5, 2023, SAWPA received the required written report detailing the cause and corrective action taken to prevent a recurrence of violations. The pH exceedance was attributed to the generator and corrective action is the generator's responsibility, as documented in Section 7.4.2.8, Western Water Municipal Water District, Enforcement Action, Saratoga Foods, Inc. To address the manifest mishandling, the permittee has retrained all drivers on manifest and hauling requirements, including additional pH monitoring of load prior to discharge at the collection station, and added additional review measures on manifests going forward. Enforcement closed on October 5, 2023. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at K-VAC Environmental Services, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.8 Western Municipal Water District (Western Water)

Description of Western Water

Western Water is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries connected to the Brine Line within its service area (Reach IVD, Reach IVB and Reach V). Western Water was formed in 1954 under the Municipal Water District Act of 1911 for the purpose of bringing supplemental water from the Metropolitan Water District of Southern California to the growing western Riverside County. Western Water's service area covers 527 square miles, serving a population of approximately 1 million people. The District serves 10 wholesale customers with imported water via the Colorado River and the State Water Project. Western Water also supplies imported water and groundwater directly to approximately 25,000 residential, commercial, and agricultural customers in the areas of El Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Orangecrest, Mission Grove, Lake Mathews, March Air Reserve Base, Rainbow Canyon and portions of the cities of Riverside and Murrieta. The Murrieta division provides water and wastewater services in a 6.5-square-mile portion of Murrieta and relies on both groundwater and imported sources. The Western Water headquarters is located in Riverside, California and serves the western Riverside County portion of the watershed, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

Frutarom USA, Inc. (Permit No. D1029-4)

Frutarom USA, Inc. produces flavor bases for the food industry. The wastewater generated includes bottling, dryer and blender rinse waters, powder control – air scrubbing, floor washdown, extraction, and boiler blowdown. The facilities pretreatment system uses an oil and grease interceptor, pH neutralization, and sulfide treatment. On June 17, 2024, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Frutarom USA, Inc. for a pollutant discharge violation. On June 6, 2024 during an inspection event, Western Water personnel collected a field grab sample for Total Sulfide (TS) and Dissolved Sulfide (DS). Results of the field analysis indicated that the TS result was compliant, but the DS analysis resulted

in a 0.8 mg/L at 10:35 AM, an exceedance of the daily maximum discharge limitation of 0.5 mg/L as stated in Permit No. D1029-4. Upon continuance of the inspection, it was observed that the first-rinse chemical tote and four (4) 55-gallon bleach containers were not properly spill contained. Frutarom Staff were alerted to halt the discharge to initiate additional pretreatment. At 12:05 PM, a sample was collected which resulted in 0.1 mg/L for DS when discharge was allowed to resume. The NOV/OCA required the permittee to submit a written investigative report to Western Water by July 2, 2024, detailing the cause of the Dissolved Sulfide and spill containment violations, along with corrective actions designed to prevent the recurrence of these violations. Furthermore, the permittee was required to install spill containment for the First Rinse tote and the four 55-gallon sodium hypochlorite drums and notify Western Water upon completion, no later than July 7, 2024. On July 1, 2024, Frutarom submitted the required investigative report and Corrective Action Plan in response to the NOV/OCA and attributed the documented violation to certain products that had been manufactured earlier that had caused a spike in the dissolved sulfides. Moving forward the permitted stated a regular inspection shall be conducted to make sure dissolved sulfides are in compliance prior to discharge. Also, all chemicals were placed on containment as required. Enforcement closed on July 1, 2024. Western Water shall continue to conduct unannounced inspections and wastewater monitoring at Frutarom USA, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

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

Saratoga Foods, Inc. manufactures blended spices for the food industry by mixing various spices with minimal food-grade oils. The products vary in size from a few ounces to 50 pounds. Wastewater is generated from facility cleanup between different spice blends, from allergen cleaning, and periodical deep cleaning. The pretreatment system includes solids removal and pH equalization. A Notice of Violation and Order for Corrective Action (NOV/OCA) was issued on September 28, 2023, for a pH violation detected at the Western Water Collection Station, discharge of an unpermitted wastestream from their spill containment, and failure to properly fill out the waste haul waste manifest. On September 5, 2023, at 11:02 am a pH alarm was triggered at the collection station by a load hauled from the Permittee. A City of Corona Operator responded to the alarm by collecting a wastewater sample from the K-VAC Environmental Services, Inc. truck discharging to the collection station and conducted a field analysis of the sample using a hand-held pH meter. The analysis indicated a pH result of 12.07 S.U. Furthermore, the permittee failed to complete Section A of Brine Line Manifest #169138 as required in Permit No. I1128-2. The NOV/OCA required Saratoga Foods to investigate the causes of the violations and to submit an investigative report and a Corrective Action Plan no later than October 15, 2023. The Permittee submitted the required reports on October 13, 2023. The pH violation was attributed to the spill containment washdown water being discharged into the holding tanks. The Permittee retrained all staff responsible for completing manifests, proper pH monitoring procedures and proper wastewater tank pump out procedures. The Permittee also worked with K-VAC Environmental Services, Inc. to refine procedures for loading the Liquid Wastehauler Truck for discharge. Review indicated the Permittee met the requirements set forth by the NOV/OCA and has returned to compliance. Enforcement closed on October 16, 2023. Western Water shall continue to conduct unannounced inspections and wastewater monitoring at Saratoga Foods, Inc. to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.9 Yucaipa Valley Water District (YVWD)

Description of YVWD

YVWD is a Water District responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area. Currently there are no permitted users within the YVWD service area. YVWD was formed on September 14, 1971, when the Secretary of State of California certified and declared formation of the District. The District operates under the County Water District Law, being Division 12 of the State of California Water Code. Although the immediate function of the District at the time was to provide water service, the YVWD currently provides a variety of services to residential, commercial and industrial customers. The YVWD provides sewer collection and sewer treatment services. Sewer treatment takes place at the highly advanced Wochholz Regional Water

Recycling Facility that provides advanced treatment, including the capability to demineralize the recycled water. The demineralization process involves a reverse osmosis system that separates small molecules from the recycled water supply. In 2012, the YVWD completed the extension of the Inland Empire Brine Line operated by the Santa Ana Watershed Project Authority. The brine disposal facility is critical to insure the YVWD meets the stringent water quality objectives set by the Regional Water Quality Control Board for the Yucaipa Management Zone, Beaumont Management Zone and the San Timoteo Management Zone.

Although YVWD currently has no permitted industries discharging to the Brine Line they have participated in Brine Line activities, including training conducted by SAWPA personnel, since 2013. They conduct the industrial user survey upstream of the Henry Wochholz Regional Water Recycling Facility that began discharge to the Brine Line in July 2016, in accordance with SAWPA policies and procedures.

Enforcement Action

There was no enforcement action during this reporting period.

7.4.3 Self-Monitoring Program

A self-monitoring program is required of permittees discharging to the Brine Line. The self-monitoring reports (SMRs) are delivered to the applicable agency for review and action if required. The SMR water quality data is included in the SAWPA Data Management System.

7.4.4 Field Inspection, Sampling, and Monitoring QA/QC

SAWPA conducts sampling QA/QC in accordance with EPA requirements including equipment blanks and field blanks. Analysis of the QA/QC data indicated samples collected were representative and free of contamination.

7.4.5 Identification of New Permittees

SAWPA requires a wastewater discharge permit for all facilities with discharge to the Brine Line, except for certain areas in the JCSD and Western Water service areas, therefore new permittees are identified upon their completion of a wastewater discharge permit application. Most new companies identified by SAWPA or upstream agencies in areas upstream of emergency connections are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. Facilities identified upstream of emergency connections requiring a permit are responded to by the upstream agency with oversight by SAWPA. These permitted facilities are listed in the corresponding agency's Annual Reports.

The City of Beaumont

In the Beaumont service area upstream of the City of Beaumont wastewater treatment plant, Beaumont checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by Beaumont as required. Beaumont obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Industry, trade, or association magazines
- Internet searches and 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 and internet searches
- City utility service requests
- City referrals during stormwater and collection system crew inspections
- City referrals from code enforcement department

Most new companies that could potentially connect to the Brine Line are identified by IEUA field inspectors while out inspecting current permittees and when following up on tips provided by the City of Chino Source Control Division.

Jurupa Community Services District

In the JCSD service area, SAWPA checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by SAWPA and JCSD as required. SAWPA or JCSD obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

JCSD will conduct regular inspections of all customers connected to the Inland Empire Brine Line (Brine Line) to verify the type of wastewater generated at their location. In addition, any closed-circuit TV (CCTV) revealing a possible illegal connection will be investigated. The majority of new companies identified by SAWPA or upstream agencies in these scenarios are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. A priority determination is assigned as follows: High Priority – any non-permitted facility generating industrial wastewater is inspected and monitored annually for local limits, Medium Priority – any dry manufacturing facility is inspected every 2 years unless changes to manufacturing and Low Priority – warehouse/commercial business is inspected every 5 years. Facilities identified in the JCSD service area requiring a permit is reviewed by SAWPA with final permit concurrence

by OC San. Facilities identified upstream of emergency connections in other jurisdictions requiring a permit are reviewed by the upstream agency with oversight by SAWPA.

San Bernardino Municipal Water Department

In the SBMWD service area all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by SBMWD and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

San Bernardino Valley Municipal Water District

In the Valley District service area, all new proposed connections must complete a permit application that is thoroughly reviewed by Valley District and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

Western Municipal Water District

In the Western Water service area, except for the areas upstream of the City of Corona Water Reclamation Facility (WRF) No. 1 and the Western Riverside County Regional Wastewater Authority (WRCRWA) South Regional Pump Station (SRPS), all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by Western Water and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit. For the Corona WRF No. 1 emergency discharge connection, Western Water directs the City of Corona, with oversight by SAWPA, through their industrial wastewater survey process. The City of Corona is alerted of any new business moving into its jurisdiction through the building department and business license process. New businesses are given a pretreatment questionnaire, which is returned to the City's Source Control Department and reviewed. Source Control personnel visit the site to verify the information submitted in the questionnaire.

In the Western Water service area with the 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

Rohr, Inc. (Rohr) a part of Collins Aerospace, operates the Groundwater Pump & Treat (P&T) system under the oversight of the Santa Ana Regional Water Quality Control Board (SARWQCB). Activities include groundwater pump and treatment and discharge of treated groundwater to the City of Riverside publicly owned treatment works (POTW) via an industrial user permit. The objective of the groundwater P&T system is to hydraulically control and minimize the potential of the Site groundwater plumes from entering surface water or migrating off-site. In 2019 the City of Riverside lowered the local limit for TDS from 2,500 mg/L to 1,210 mg/L. To meet the new local limit, Rohr is proposing to divert approximately 50% of fully treated water from the system's effluent trunk line and process it through reverse osmosis (R.O.) units. R.O. concentrate brine waste is the only source of wastewater that will be hauled to the Brine Line Collection Station at a volume of approximately 5,000 gallons per week. OC San had initially concurred on a permit, however suspended concurrence, on a following draft permit submitted after Rohr had voluntarily chosen to install treatment for PFAS. SAWPA is working with OC San to resolve the concurrence suspension and the facility is expected to begin discharge to the Brine Line in early Fiscal Year 2024/2025.

Western Riverside County Regional Wastewater Authority (WRCRWA) South Regional Pump Station (SRPS) located at 671 N. Lincoln Avenue, Corona, CA 92880 pumps approximately 3.0 MGD of predominately domestic sewage with some light commercial dischargers to WRCRWA's Treatment Plant located at 14634 River Road, Corona, CA 92880. This facility was previously allowed to discharge during unplanned events to the Brine Line, however in October of 2020 WRCRWA was notified that additional redundancies must be added to the system to ensure hydraulic control is maintained to prevent unauthorized discharge to the Brine Line. WRCRWA responded on February 2, 2021, providing a conceptual plan for the installation of a standalone backup pump to minimize and/or eliminate the potential for discharges of wastewater into the Brine Line from SRPS during an emergency, or other, event. On March 13, 2023, SAWPA issued a letter to WRCRWA documenting that SAWPA and OC San have reviewed the conceptual plan submitted by WRCRWA and that SAWPA accepts the conceptual plan as submitted. An RFP for the preparation of design and construction documents (plans and specifications) was prepared by WRCRWA and issued on May 9, 2023. Proposals were received on June 5, 2023. A recommendation to approve an engineering services contract was presented to the WRCRWA Executive Committee on September 14, 2023, and was approved at the WRCRWA Board meeting on September 28, 2023. The contract was awarded to Lee + Ro Water Infrastructure Engineers. A kick-off meeting for the project was held on October 18, 2023, with the consultant and engineering staff following up with a visit to the project site on October 30, 2023. The contract staff are currently evaluating configurations for the bypass pump project along with other alternatives and upgrades to the original design. The engineers are meeting with pump manufacturers to compare the cost for alternatives to one large pump versus two smaller pumps as they do not believe the current designed system can meet the design parameters. A meeting was held on February 5, 2024, with suppliers and on February 23, 2024, specifications and quotes were given for the alternative design. Three alternatives have been identified at this stage:

- Alternative 1 - Installation of three Pioneer pumps. Due to NPSHR requirements, this option requires running a minimum of two pumps at the same time, and for peak flow it would require operation of all three pumps. In addition, a triplex control panel would be required.

- Alternative 2 – Installation of three Pioneer pumps with a Splitter Box to enhance system safety factor.
- Alternative 3 – Emergency Generator.

A follow-up meeting will be scheduled to further discuss these three alternatives and choose the most feasible and cost-effective alternative solution for this project. It is anticipated that construction will be completed, and the final plan implemented for the SRPS in 2025.

7.4.7 SAWPA Special Projects

SAWPA conducted the following special project efforts during the reporting period:

1. Air/Vac Structure Maintenance – 10 structures cleaned, inspected, and overhauled on Reach V.
2. Air/Vac Structure Maintenance – 8 locations were cleaned and weeded on Reach V.
3. Air/Vac Structure Maintenance – 2 cans were cleaned and painted on Reach V.
4. Air/Vac Structure Maintenance – 1 isolation valve can was replaced on Reach V.
5. Air/Vac Structure Maintenance – 5 structures cleaned, inspected, and overhauled on Reach IV-B Lower.
6. Air/Vac Structure Maintenance – 1 structure cleaned, inspected, and overhauled on Reach IV-E.
7. Valve Exercise – Reach V.
8. Graffiti Removal – Reach V.
9. Completed easement road maintenance on Reach IV.
10. Traffic control and permitting for reach 4D line inspection and cleaning.
11. Completed 1778 dig alert tickets

Table 7.4 Summary of SAWPA Special Projects, July 1, 2023 – June 30, 2024 Santa Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division									
Activity	Reach IV	Reach IV-A Lower	Reach IV-A Upper	Reach IV-B Lower	Reach IV-B Upper	Reach IV-D	Reach IV-E	Reach V	Corona Lateral
ROW Maintenance	6 Miles	2.25 Miles	2,304 Feet	3,662 Feet					831 Feet
Line Inspection	2.69 Miles	2,000 Feet	4,000 Feet			37,000 Feet			
Line Cleaning	2.69 Miles	5,600 Feet	4,000 Feet			37,000 Feet			
MAS Inspection	7	23	20	8	2	16	6	10	6
MAS R&R	4		2			2			
Pot Holing					2	10	3	6	
Frame and Cover R&R			4			6			

7.4.8 SAWPA Member and Contract Agency Ordinances and Resolutions

- SAWPA adopted Ordinance No. 8 and Local Limits Resolution 2017-11 on September 19, 2017.
- EMWD adopted EMWD Ordinance No. 91.3, incorporating the changes made for SAWPA Ordinance No. 8 on May 2, 2018.
- IEUA adopted IEUA Ordinance No. 106, incorporating the changes made for SAWPA Ordinance No. 8 on February 21, 2018.
- JCSD adopted the JCSD Brine Line Ordinance 423 on January 8, 2018, incorporating the changes made for SAWPA Ordinance No. 8. JCSD adopted JCSD Brine Line Ordinance 424, incorporating the changes made for SAWPA Resolution 2017-11 on January 22, 2018.
- SBMWD adopted SAWPA Resolution No. 2017-11 with SBMWD Resolution No. 918 on October 17, 2017. SBMWD adopted SAWPA Ordinance No. 8 with SBMWD Resolution No. 919 on October 17, 2017.
- Valley District adopted Valley District Ordinance No. 80, incorporating the changes made for SAWPA Ordinance No. 8 on June 19, 2018.
- Western Water adopted Western Water 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 7.5 Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2023– June 30, 2024 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 Water 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 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. IEUA's Source Control, Collections, and External Affairs staff also work collaboratively with member agencies in the IEUA service area and mutual aid partners regarding FOG, No Drugs Down Drain, and non-flushable wipes.

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 maintains a public education program which includes outreach through a variety of communication methods. As part of this education program, SBMWD advises customers about water conservation, common pollutants, and FOG through participation in K-12 classroom presentations, community events, and presentations to partner organizations and community groups. Inspectors provide Best Management Practice (BMP) brochures during site inspections to educate industry and minimize the discharge of pollutants. Additionally, SBMWD shares the information via printed materials including newsletters, annual reports, customer mailers, and handouts. SBMWD also posts these materials digitally on the department website.

Valley District provides public educational information to their customers to encourage the efficient use of water through advertising, classroom instruction, contests, paying 25% of retail water agency rebates, etc. In collaboration with its retail water agencies, iEfficient.com was created, which provides water-saving tips and information on water issues. Valley District conducts regular Board Meetings which are open to the public on the 1st and 3rd Tuesday of each Month. Valley District also provides public information via their website at <http://www.sbvmd.com/> which includes scheduled events and other opportunities for public participation on a variety of issues.

Western Water provides public educational information to their customers to encourage the efficient use of water through advertising, rebates, programs, and workshops.

7.4.12 Other Public Participation

SAWPA Agency Dental Amalgam Programs

City of Beaumont (Beaumont)

The Beaumont Wastewater Treatment Plant (WWTP) has no direct connections to the Brine Line from dental facilities within their jurisdiction. Beaumont has one permit, issued by SAWPA, for the Beaumont WWTP that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the Beaumont WWTP, Beaumont identified 14 dental facilities in the service area and 43 similar facilities that do not use amalgam, such as orthodontics facilities. Beaumont has on file Dental Discharger Compliance Reports for 13 of 14 dental facilities, with one pending an onsite inspection. Each facility is inspected annually.

Eastern Municipal Water District (EMWD)

EMWD has no areas of discharge to the Brine Line which have dental facilities.

Inland Empire Utilities Agency (IEUA)

IEUA has one direct connection to the Brine Line from a dental facility within their jurisdiction. The California Institution for Women has two (2) buildings that each have a dental facility that removes amalgam. Each dental facility has (3) chairs, and each has an amalgam separator. A One Time Compliance Report (OTCR)

submitted by CIW has been accepted by IEUA. 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 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. Since June of 2022, IEUA received one (1) OCTR report from new dental facilities and confirmed closure of five (5) facilities within the cities of Chino and Chino Hills. To date 100% of the OCTR surveys have been received from dental facilities identified within the cities of Chino and Chino Hills.

Jurupa Community Services District (JCSD)

JCSD has no dental facilities from the areas with direct connections to the Brine Line. In the event an emergency discharge event occurs, which requires JCSD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the WRCRWA or City of Riverside Treatment Plants. JCSD has issued surveys to all dental facilities that discharge within the service areas that require a letter to discharge to the Brine Line. All open facilities have submitted their one-time compliance report (OTCR) and have been inspected to verify compliance.

San Bernardino Municipal Water Department (SBMWD)

There are no dental facilities within the SBMWD service area which have a direct connection to the Brine Line. In the event an emergency discharge event occurs, which requires the SBMWD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the SBMWD Water Reclamation Plant. The SBMWD Environmental Control Section has actively implemented a Dental Amalgam Program beginning in 2016 with 155 dental facilities identified within the service area. All the facilities have been inspected with one hundred and fifteen (115) dental industrial users submitting the required compliance report and the remaining forty (40) facilities determined to have either ceased operations or have not been classified as dental industrial users (i.e., dental imaging only, veterinarian clinics, orthodontics only). In 2021, SBMWD Environmental Control conducted inspections which identified one hundred and two (102) active dental facilities with the required compliance reports on file and fifty-three (53) facilities determined to have ceased operations or are not classified as dental industrial users.

San Bernardino Valley Municipal Water District (Valley District)

Valley District has no areas of discharge to the Brine Line which have dental facilities.

Western Municipal Water District (Western Water)

Western Water has no direct connections from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires Western Water to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge from the following service areas:

- **City of Corona WRF No. 1.**

The City of Corona has implemented ongoing monitoring via the new business license list that is received monthly. Corona is still conducting ongoing surveying of all dental offices coming through their plan check process. There are a total of 120 facilities that are being tracked and Corona still monitors new and used business licenses to ensure all dental offices are submitting the proper documentation.

- **WRCRWA SRPS**

WRCRWA has four agency jurisdictions that discharge to the WRCRWA SRPS: Western Water, Home Gardens, City of Norco, and City of Corona. The Western Water area is residential, and no dental facilities have been identified. Home Gardens has issued surveys to all dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction. All dental facilities have been surveyed and have been made aware of the dental amalgam rule. Currently, no dental offices within Home Gardens use Amalgam. The City of Norco identifies all of the dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction, and issues surveys to these facilities regarding dental amalgam usage. At this time, nineteen facilities have been identified and have had their surveys completed and returned. Of these nineteen facilities, two have had changes in ownership but remain dental offices, while two others have since closed down. The City of Norco reviews new dental office openings for survey recipients as part of the business licensing process.

Yucaipa Valley Water District (YVWD)

YVWD has no direct connections from dental facilities within their jurisdiction. YVWD has one permit, issued by SAWPA, for the Henry Wochholz Water Reclamation Facility that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the YVWD Henry Wochholz Water Reclamation Facility YVWD has received all the surveys back.

7.4.13 Changes to the SAWPA Pretreatment Program

SAWPA has continued to refine a new Pretreatment Program developed in 2013. SAWPA staff consists of a Manager of Permitting and Pretreatment, a Senior Pretreatment Program Specialist, with an additional 0.7 full-time equivalent consisting of other SAWPA personnel. SAWPA oversees the Brine Line program with assistance from Pretreatment Program managers, senior management, and inspectors from the Member and Contract Agencies. A full description of personnel available to the Brine Line program is detailed in 7.4.14.

Two working groups made up of 1) Pretreatment Program managers; and 2) managers and senior management met during the year to coordinate the work of the Pretreatment Program team. Working group meetings are utilized to review Brine Line procedures, discuss upcoming pretreatment issues, and provide training on various topics related to the program. SAWPA continued an Inter-Agency training program to promote the continued growth of all agency inspectors. Inspectors from each agency accompany a different agency on an inspection each quarter to observe inspection practices, but also see new types of facilities, broadening each inspector's experience.

SAWPA conducted the Semi-Annual Brine Line Audit with the distributed pretreatment program administered by the SAWPA Agency staff. SAWPA compiled the individual agency audit reports and issued these to each Agency in April of 2024. During these audits SAWPA personnel ensure agencies were performing inspection, monitoring, permitting, and enforcement activities in line with the SAWPA policies and procedures. SAWPA personnel reviewed documentation for completeness, accuracy, and adherence to SAWPA policies and consistency between agency programs. SAWPA observed no major findings at any of the member or Contract Agencies.

SAWPA Draft Pretreatment Program Control Documents Submittal

SAWPA Submitted draft updates to the Pretreatment Program Control Documents (PPCDs), also known as the SAWPA Policy and Procedures, for OC San's review on April 2, 2018. These documents have been updated to incorporate OC San's outstanding comments from their 2013 review of the PPCDs, to incorporate changes due to SAWPA Ordinance No. 8 and Local Limits Resolution 2017-11, as well as to incorporate any program changes SAWPA has made since 2013. SAWPA also engaged OC San regarding a potential Stormwater Policy based on the OC San Business Washpad Rule. SAWPA's intent was to employ the Policy requiring a SOP for facilities that had potential to discharge stormwater as outlined in the draft Policy. SAWPA has previously shared the draft Stormwater Policy with OC San. SAWPA understands that OC San wished to withhold any potential concurrence on this document until a template SOP for the

Stormwater Policy could be reviewed. These documents were submitted alongside the Draft Pretreatment Program Control Documents submittal on April 2, 2018. In a letter dated February 15, 2019, OC San responded to the April 2, 2018, Draft Pretreatment Program Control Documents submittal with submittal review comments. SAWPA and OC San have met to review these comments in more detail however it was agreed that work on the PPCDs should wait until completion of Ordinance No. 9.

OC San has completed the process of updating and revising their Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OC San, SAWPA is required to update their Ordinance to include relevant OC San revisions. SAWPA has developed draft Ordinance No. 9, which has been revised to incorporate the updates within the new OC San Ordinance. The proposed updates include a new prohibition on hydrolysate, a new prohibition on discharge via non-domestic surface or floor drains, and clarification of existing language for facility reports of changed conditions and notifications for sale of change of ownership. Additionally, SAWPA has proposed additional revisions to update the definition of an Industrial User to standardize it with the OC San definition. Furthermore, SAWPA has proposed creation of a new classification of Non-Industrial User for Brine Line dischargers that do not meet the definition of an Industrial User. SAWPA has also created a new authorization process, a Connection Authorization, that will allow greater flexibility in managing infrequent discharges to the Brine Line. SAWPA submitted the most recent draft of Ordinance No. 9 to OC San on November 6, 2020, and have been working collaboratively with OC San throughout the years to further refine this revision.

7.4.14 Pretreatment Program Budget

Staffing – EMWD

As of June 30, 2024, the Pretreatment Program staff consists of 1 director, 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 2023/24 was \$426,446.

Staffing – IEUA

As of June 30, 2024, the Pretreatment Program staff consists of 1 manager, 1 engineer, 4 field inspectors, 1 supervisor, and 1 administrative support personnel for a total of 8 staff members. The total estimated budget for FY 2023/24 was \$219,669. This represents the total estimated budget dedicated to Brine Line activities.

Staffing – JCSD

As of June 30, 2024, the Pretreatment Program staff consists of 1 supervisor, and 2 field inspectors for a total of 3 staff members. The JCSD Pretreatment Budget for FY 2023/24 was \$326,683 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, 2024, the Pretreatment Program staff consists of 1 supervisor, 1 lead inspector, 2 inspectors, 1 collection station operator, and 1 administrative support personnel for a total of 6 staff members. Total budget for the entire Pretreatment Program including the brine program for 2023/24 for staff and equipment was \$1,059,464. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

Staffing – Valley District

As of June 30, 2024, 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 2023/24 was \$80,833, which includes the sampling and monitoring costs. Valley District management time is estimated at approximately 15% of the program implementation budget, or \$12,125. The Agency does not track time to differentiate between Brine Line and non-Brine Line activities. Total cost for FY 2023/24 was approximately \$92,958.

Staffing SAWPA

As of June 30, 2024, the Pretreatment Program staff consists of 1 manager, and 1 senior specialist. An additional 0.7 FTE is contributed by 1 engineer, and 4 technical support personnel. The actual Brine Line Pretreatment Program activity expenditures for FY 2023/24 were \$1,087,024.

Staffing – Western Water

As of June 30, 2024, the Pretreatment Program staff consists of 1 manager and 2 specialists for a total of 3 staff members. The estimated budget for FY 2023/24 was \$300,000 (this figure does not include sampling costs, which are assigned to the customer as a pass-through charge). The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

7.4.15 Equipment Inventory Listing

The Summary of Pretreatment Equipment used by and available to SAWPA in Pretreatment Activities, such as field inspection and sampling activities, is provided in the following table. The quantities listed in each Member and Contract Agency column below represent the total resources available for Brine Line activities. The Member and Contract Agencies do not track time to differentiate between Brine Line and non-Brine Line activities or resource allocations. A summary of the pretreatment equipment used by the dischargers is shown in Appendix H titled “SAWPA Pretreatment Program Permittees with Pretreatment Equipment.”

Table 7.6 Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2023/24						
Santa Ana Watershed Project Authority Orange County Sanitation District						
Equipment Description	Quantity					
	EMWD	IEUA	JCSD	SBMWD	SAWPA	Western Water
Vehicles	7	4	32	3	2	83
Automated Samplers	1112	1617	914	1413	8	1213
Handheld Portable Samplers	-	-	2-	54	1	-
Sampler Batteries	2414	40	1810	2327	5	5
Sampler Battery Chargers	1215	18	2	4	1	2
Sampler Battery Power Packs	43	1	-1	-	1	1
Portable Area/Velocity Flow Meters	627	5	5	-	-	-
Gas Meters/Detectors with Pumps	7	4	-2	2	1	2
Laboratory Dishwashers	-	1	1	-	-	-
Ice Machines	14	1	21	1	1	3
Portable pH Meters	67	8	48	65	1	2
Sulfide Test Kits	1	7	1	2	1	12
SONDE Trunk Line Monitoring Devices	-2	42	-	-	-	-
Laptop Computers	6	48	23	2	2	3
Continuous H ₂ S Trunkline Monitoring Devices	-	7	-	-	-	-
Spill Response Kits	-	5	-1	3	-	1

7.4.16 SAWPA Pretreatment Program Training

SAWPA, Beaumont, EMWD, IEUA, JCSD, SBMWD, Valley District, Western Water and YVWD staff attended training classes and workshops presented by the California Water Environment Association (CWEA), including the P3S conference, and Tri-State Seminar meetings.

Interagency training was conducted each quarter throughout the 2023/24 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 2023/24 fiscal year by SAWPA for member/Contract Agencies. The following training classes were conducted with all SAWPA agencies represented:

- Flow Data Submittals Training and Lessons Learned – July 20, 2023
- Brine Line Reporting Procedures Refresher – September 21, 2023
- iPACS Enforcement Refresher Training – February 15, 2024
- Monitoring Battery Alternatives and Upgrades – March 21, 2024
- Inspector Cross-Training Program – Ongoing, started in June 2024

Chapter 8. Solids Management Program

8.1 Introduction

This section provides an overview of OC San’s Biosolids Program, focusing on biosolids quality with respect to metals. Biosolids are nutrient-rich, treated organic matter recovered through the treatment of wastewater. These solids are considered a resource because of their nutrient and energy values, and they are recyclable in part because of their low metal content. The pretreatment program is a key element in ensuring the recyclability of OC San’s biosolids by minimizing the discharge of heavy metals and other undesirable constituents into the collection system and ultimately the treated solids, which are used to fertilize farms.

OC San’s annual biosolids compliance report was completed, submitted to regulators, and posted online in February 2023. Visit www.ocsan.gov/503 to access the most recent document that contains Biosolids Program information, regulations, quantities, policies, guiding principles, and how and where biosolids are recycled.

8.2 Biosolids Quality

Biosolids quality plays an important role in ensuring the continued recyclability of OC San’s biosolids. OC San’s pretreatment program has been extremely effective in reducing and maintaining levels of pollutants (e.g., OC San’s influent sewage meets drinking water standards for the biosolids monitoring metals). The ceiling concentrations and EQ concentrations promulgated by the US EPA’s biosolids regulations (40 CFR 503) are presented in Figure 8-1 through Figure 8-10 as a reference. For FY 2022/23, OC San biosolids met EQ limits for all the regulated parameters as shown in Table 8.1.

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
Arsenic	2012-13	41	0	7.8	4.7	2.0	10	7.0
	2013-14*		3.5	9.5	5.8	5.4	11	8.4
	2014-15		4.5	11	7.2	7.8	12	9.3
	2015-16*		6.3	12	8.3	6.2	12	9.2
	2016-17*		6.7	12	8.1	5.6	12	8.6
	2017-18*		7.2	16	9.9	7.9	16	11
	2018-19*		7.3	24	16	9.4	24	18
	2019-20*		1.3	8.8	5.4	1.3	12	5.5
	2020-21*		1.3	14	8.9	1.2	19	12
	2021-22		7.3	10.5	8.6	9.8	13.5	11
	2022-23		7.1	10	8.8	8.2	14	11
	2023-24		5.4	10	6.9	5.2	12	8.2
Cadmium	2012-13	39	2.6	7.8	4.7	1.9	4.4	3.1
	2013-14*		1.6	11	3.9	2.1	6.0	3.5
	2014-15		2.7	7.8	5.1	3.1	5.8	4.0
	2015-16*		1.3	4.7	2.5	2.0	4.5	3.0
	2016-17		2.6	3.1	2.3	2.0	3.8	3.0
	2017-18*		1.7	4.4	3.0	2.5	7.7	5.1
	2018-19*		1.2	3.0	1.6	2.7	8.4	4.2
	2019-20*		1.3	2.7	1.9	2.2	8.4	3.3
	2020-21*		0.9	1.6	1.3	1.6	2.5	2.0
	2021-22		0.6	1.5	1.1	1.1	1.4	1.3
	2022-23		0.7	4.6	1.9	0.6	4.9	1.7
	2023-24		0.7	5.6	3.4	0.66	4.5	2.5

Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2023/24, in Milligrams per Dry Kilogram
Orange County Sanitation District

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
Chromium	2012-13	**	42	56	49	42	59	49
	2013-14		39	52	45	40	53	46
	2014-15		30	51	40	34	70	46
	2015-16		31	89	46	28	60	46
	2016-17		30	89	49	29	67	46
	2017-18		27	38	34	38	54	44
	2018-19		29	58	39	32	53	45
	2019-20		37	51	45	35	49	42
	2020-21		43	54	48	42	65	51
	2021-22		34	49	41	41	52	45
	2022-23		34	42	37	34	51	42
2023-24	25	51	38	24	60	44		
Copper	2012-13	1,500	480	640	540	500	640	540
	2013-14		460	540	510	470	540	500
	2014-15		320	570	470	320	560	470
	2015-16		380	560	460	340	570	480
	2016-17		400	560	460	340	570	490
	2017-18		320	500	420	380	590	460
	2018-19		355	600	470	335	665	510
	2019-20		440	600	530	410	590	490
	2020-21		470	660	530	420	520	460
	2021-22		425	550	490	320	440	370
	2022-23		385	500	450	305	375	340
2023-24	220	480	400	230	410	320		
Lead	2012-13	300	7.5	19	15	7.5	17	14
	2013-14*		13	18	14	13	17	14
	2014-15*		8.7	15	13	9.0	17	13
	2015-16*		8.3	20	12	8.0	17	13
	2016-17*		7.9	20	11	7.5	17	12
	2017-18*		8.9	19	12	10	16	13
	2018-19		9.9	15	12	10	15	13
	2019-20		9.8	14	12	14	24	17
	2020-21		2.2	15	6.8	2.7	18	7.5
	2021-22		4.9	8.1	6.2	2.7	7.4	4.6
	2022-23		2.7	11	6.4	0.8	11	4.7
2023-24	1.6	16	11	1.6	13	10		
Mercury	2012-13	17	0.7	4.1	1.5	0.8	3.8	1.4
	2013-14		0.8	1.2	1.0	0.7	2.8	1.4
	2014-15		1.0	1.5	1.1	1.0	1.5	1.0
	2015-16		0.6	1.7	0.9	0.6	1.2	1.0
	2016-17		0.5	1.7	0.9	0.7	1.2	0.9
	2017-18		0.7	1.1	0.9	0.3	1.1	0.8
	2018-19		0.6	1.1	0.9	0.6	1.0	0.8
	2019-20		0.5	1.2	0.8	0.5	0.8	0.6
	2020-21		0.5	1.0	0.7	0.4	0.9	0.6
	2021-22		0.5	0.8	0.6	0.4	1	0.5
2022-23	0.5	0.9	0.7	0.4	0.7	0.5		

**Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2023/24, in Milligrams per Dry Kilogram
Orange County Sanitation District**

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
	2023-24		0.39	1.2	0.60	0.080	0.79	0.48
Molybdenum	2012-13	**	9.8	20	14	12	20	15
	2013-14		12	18	15	14	18	15
	2014-15		9.4	18	15	12	20	16
	2015-16*		11	18	15	11	23	16
	2016-17		12	18	15	11	23	16
	2017-18*		10	16	14	13	18	15
	2018-19		13	20	16	15	22	18
	2019-20		14	22	18	14	24	18
	2020-21		15	21	18	17	23	20
	2021-22		13	20	16	14	21	18
	2022-23		14	23	17	15	30	19
	2023-24		8.5	18	14	13	25	19
Nickel	2012-13	420	34	48	40	23	41	30
	2013-14		36	55	43	28	56	37
	2014-15		26	47	37	26	41	34
	2015-16*		29	45	38	20	41	33
	2016-17		25	45	36	21	41	32
	2017-18		28	37	32	31	39	34
	2018-19		23	44	33	29	44	37
	2019-20		27	41	35	26	46	35
	2020-21		28	46	36	26	33	29
	2021-22		23	33	28	25	30	26
	2022-23		27	36	31	23	30	25
	2023-24		17	63	33	16	83	31
Selenium	2012-13	100	0	20	9.0	0	20	8.0
	2013-14*		3.5	13	7.9	4.2	13	8.3
	2014-15*		4.1	13	7.1	4.5	15	7.3
	2015-16*		4.4	11	8.1	3.7	10	7.6
	2016-17*		4.1	10	8.4	4.8	10	8.0
	2017-18*		3.0	7.8	4.9	2.7	8.0	4.9
	2018-19*		2.5	48	6.6	2.3	2.9	2.7
	2019-20*		0.9	12	3.7	0.9	12	3.5
	2020-21*		1.0	12	6.5	0.9	10	6.3
	2021-22		6.7	9.3	8.0	7.5	11	9.2
	2022-23		5.7	11	8.4	4.5	11	8.3
	2023-24		4.6	11	6.9	3.9	10	6.8
Silver	2012-13	**	6.2	14	8.6	6.4	13	8.6
	2013-14*		2.9	7.6	5.3	3.6	9.1	6.3
	2014-15*		3.3	7.8	5.8	3.4	8.6	6.5
	2015-16*		2.4	7.7	5.6	2.5	7.9	5.6
	2016-17*		2.7	5.6	4.4	2.5	6.8	4.9
	2017-18*		3.2	5.1	3.9	3.7	5.0	4.2
	2018-19*		2.9	5.1	4.0	3.5	5.8	4.3
	2019-20*		3.0	5.0	4.0	2.7	5.8	4.0
	2020-21*		2.6	3.8	3.3	2.5	3.2	2.7
	2021-22		2.1	3.6	2.6	1.4	2.5	1.9

Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2023/24, in Milligrams per Dry Kilogram Orange County Sanitation District								
Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
Zinc	2022-23	2,800	2.3	3.5	2.9	1.2	2.5	1.8
	2023-24		0.59	4.4	2.1	0.53	3.7	1.4
	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
	2021-22		675	835	790	655	745	690
	2022-23		665	850	760	580	770	660
	2023-24		370	810	680	440	860	640

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).

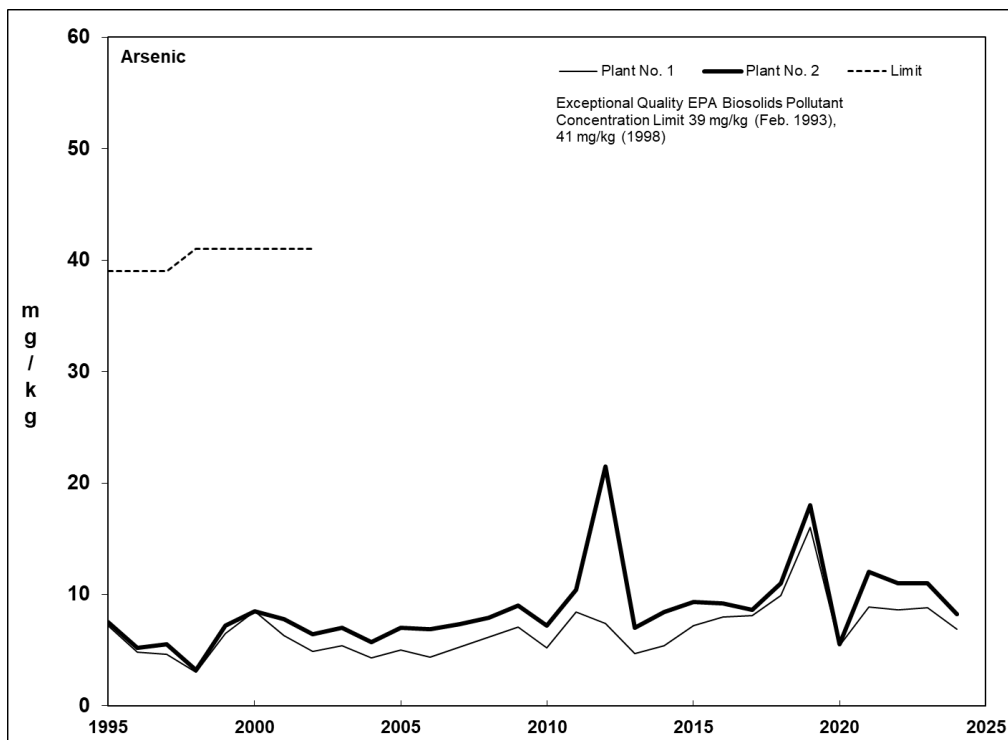


Figure 8-1 Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2023/24 Orange County Sanitation District

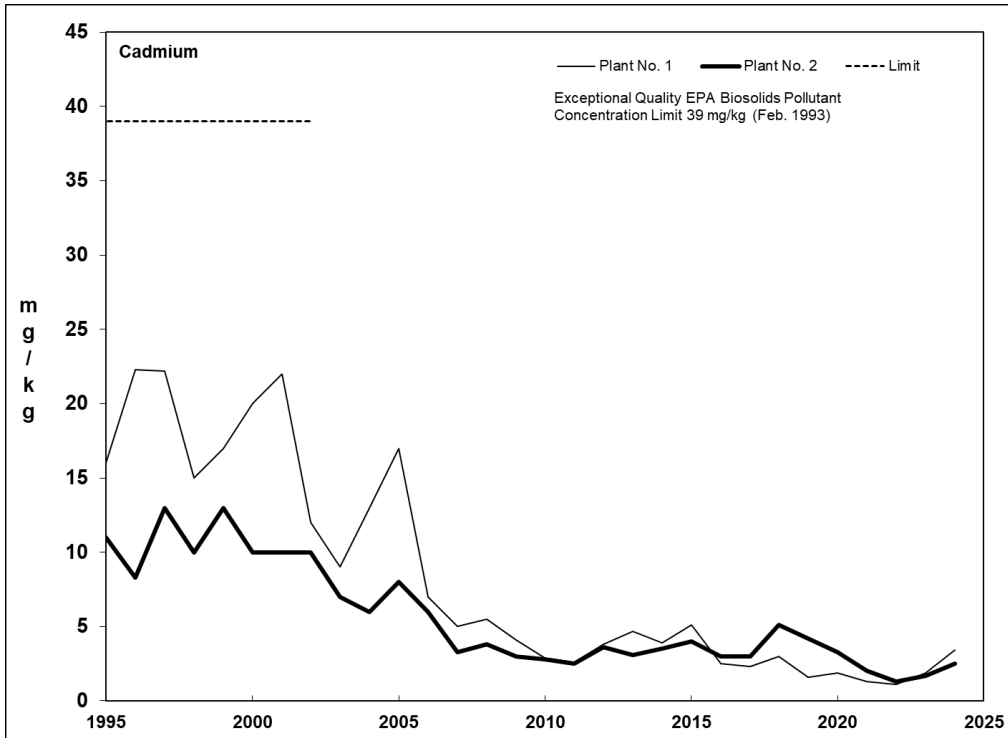


Figure 8-2 Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2023/24
Orange County Sanitation District

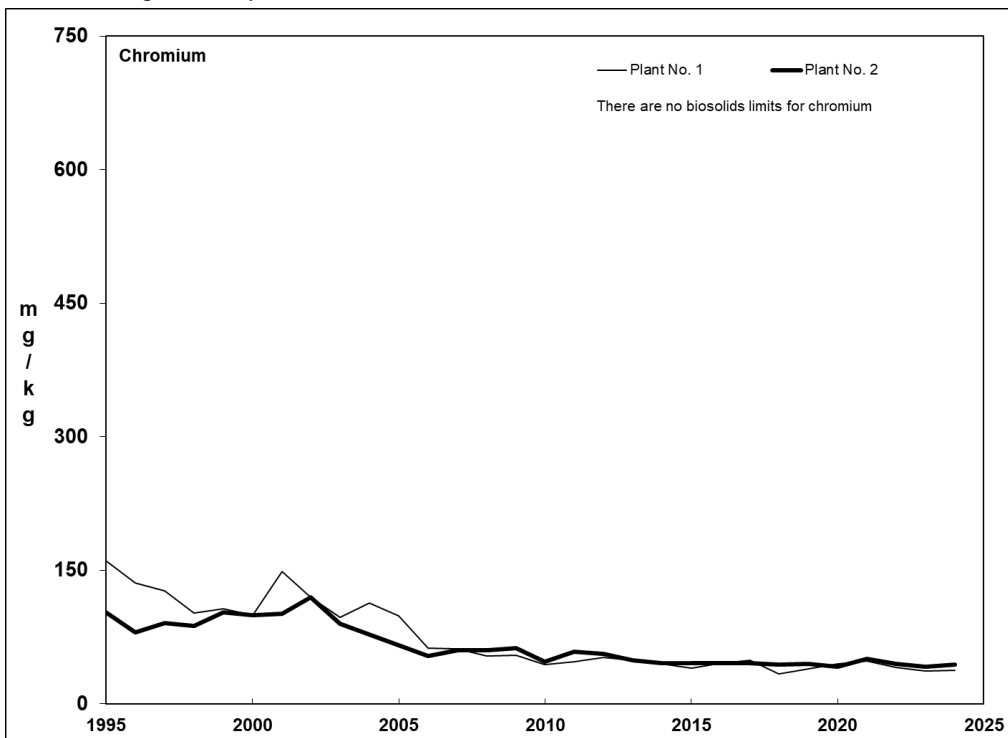


Figure 8-3 Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2023/24
Orange County Sanitation District

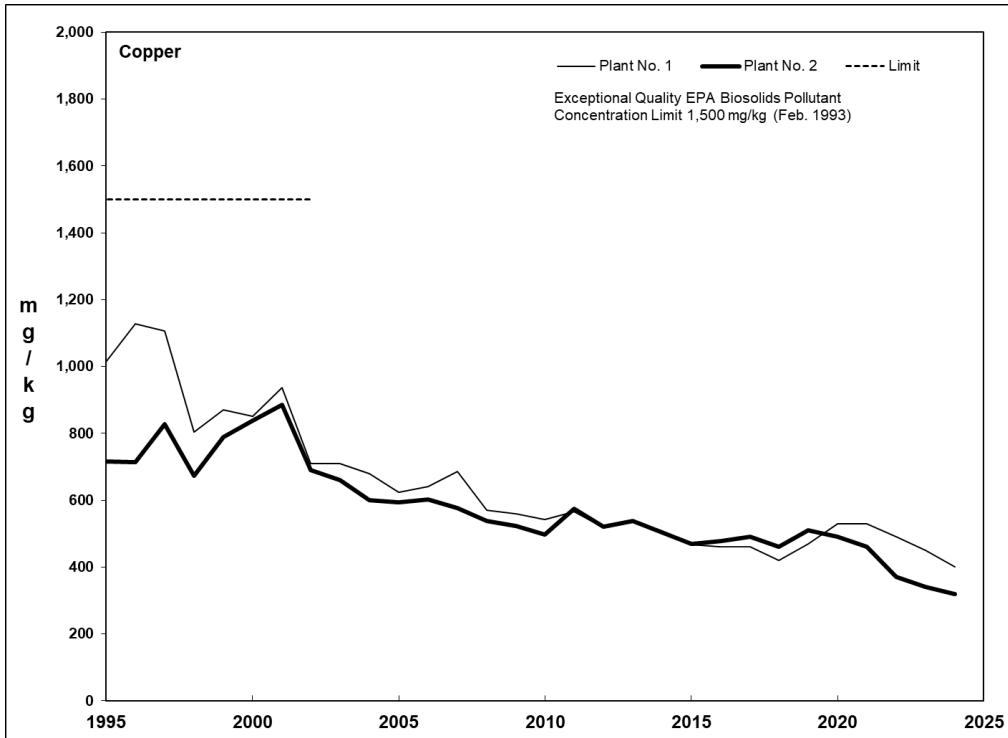


Figure 8-4 Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2023/24 Orange County Sanitation District

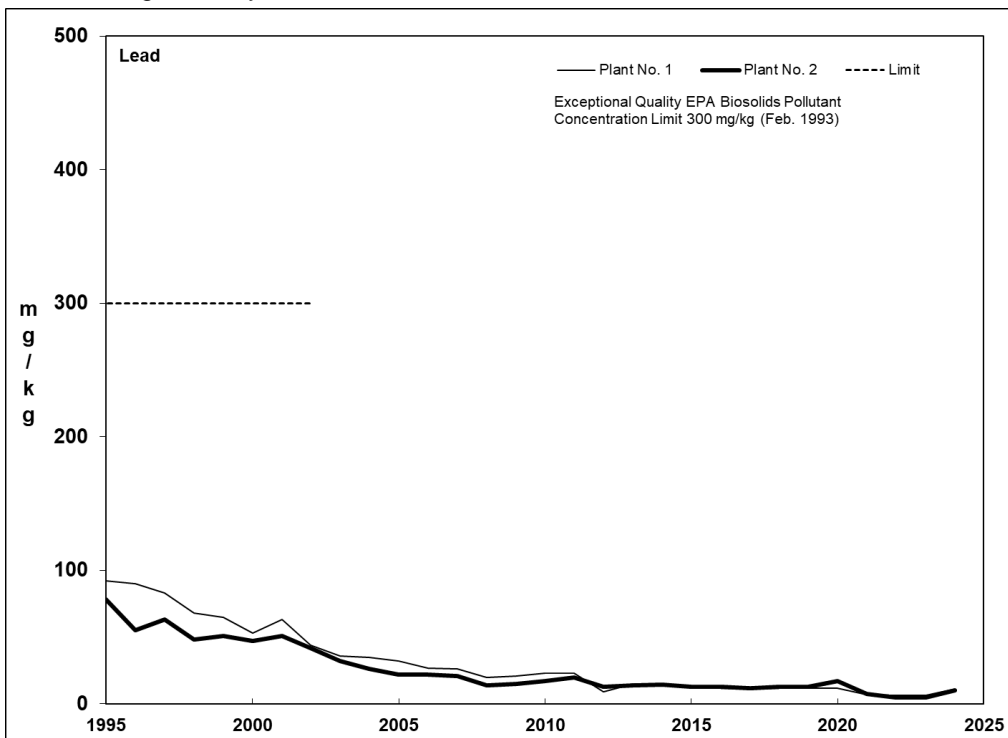


Figure 8-5 Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2023/24 Orange County Sanitation District

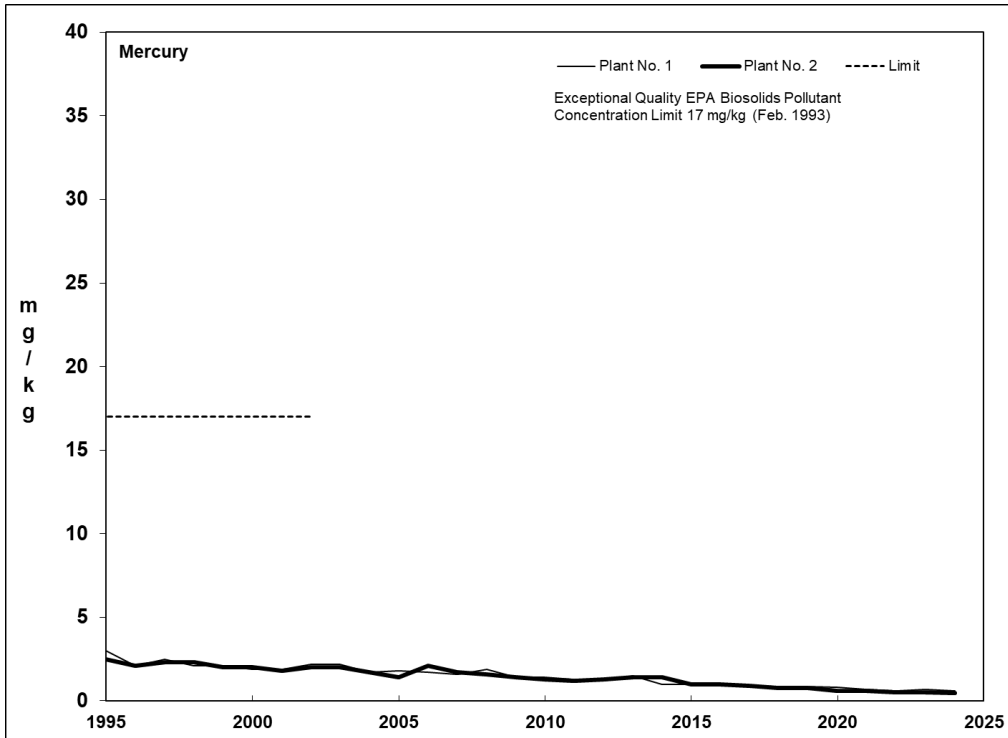


Figure 8-6 Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2023/24
Orange County Sanitation District

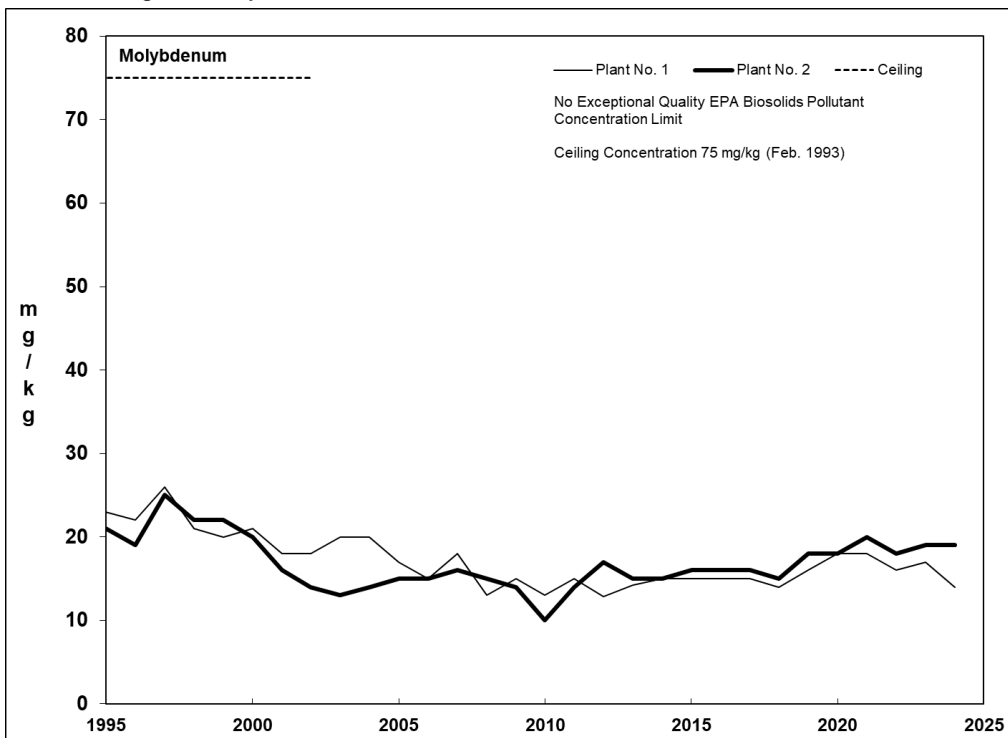


Figure 8-7 Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2023/24
Orange County Sanitation District

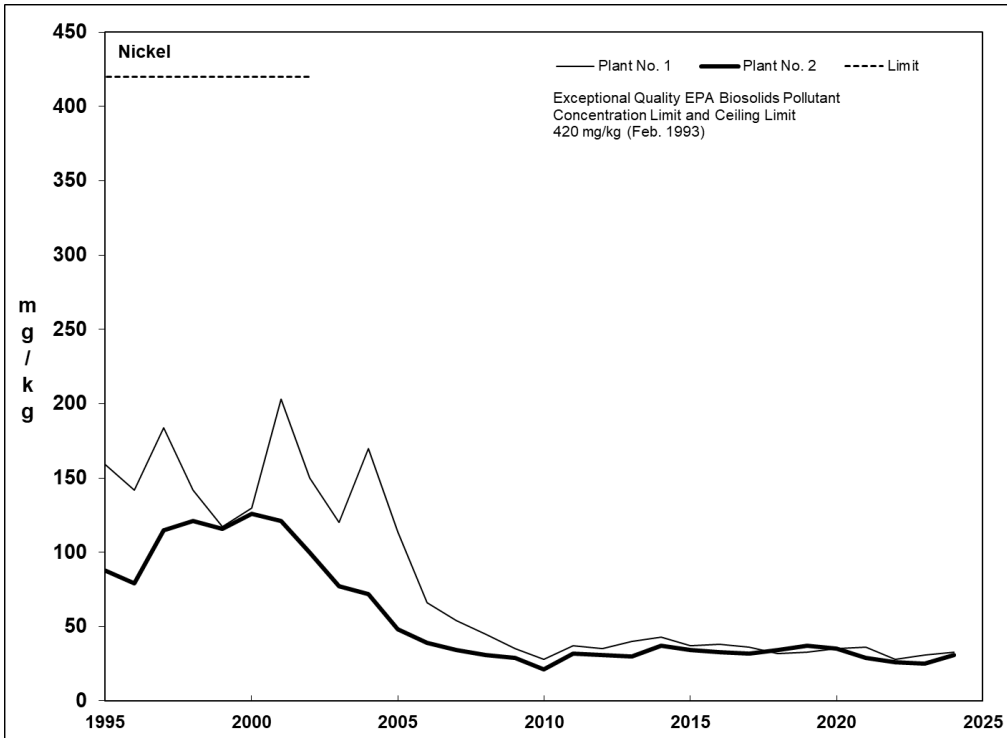


Figure 8-8 Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2023/24 Orange County Sanitation District

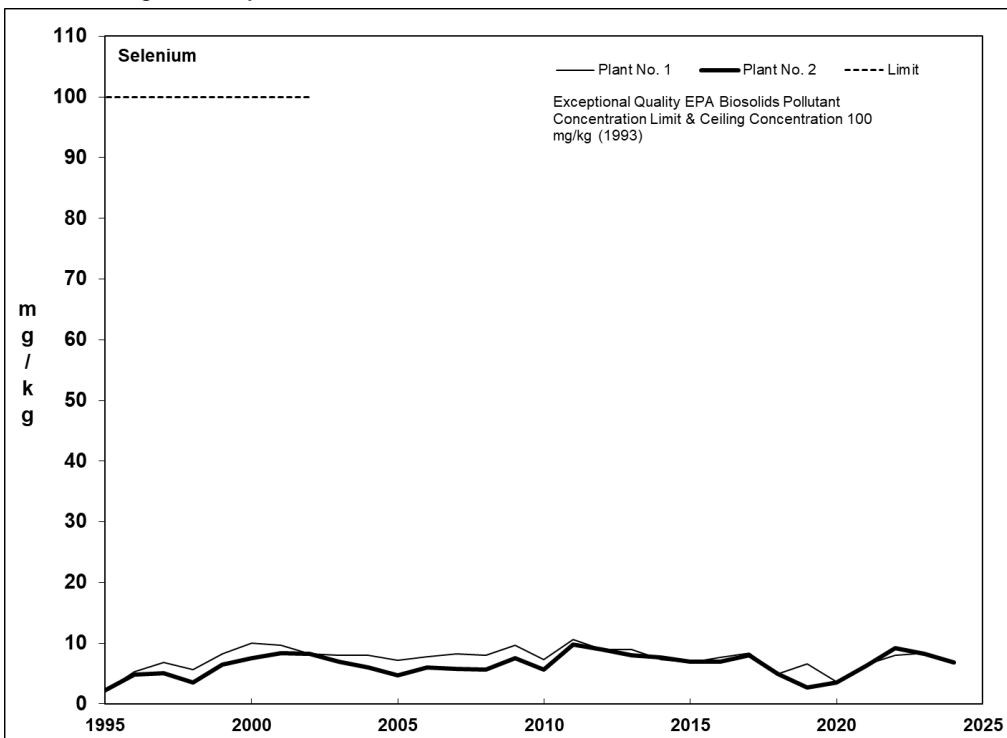


Figure 8-9 Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2023/24 Orange County Sanitation District

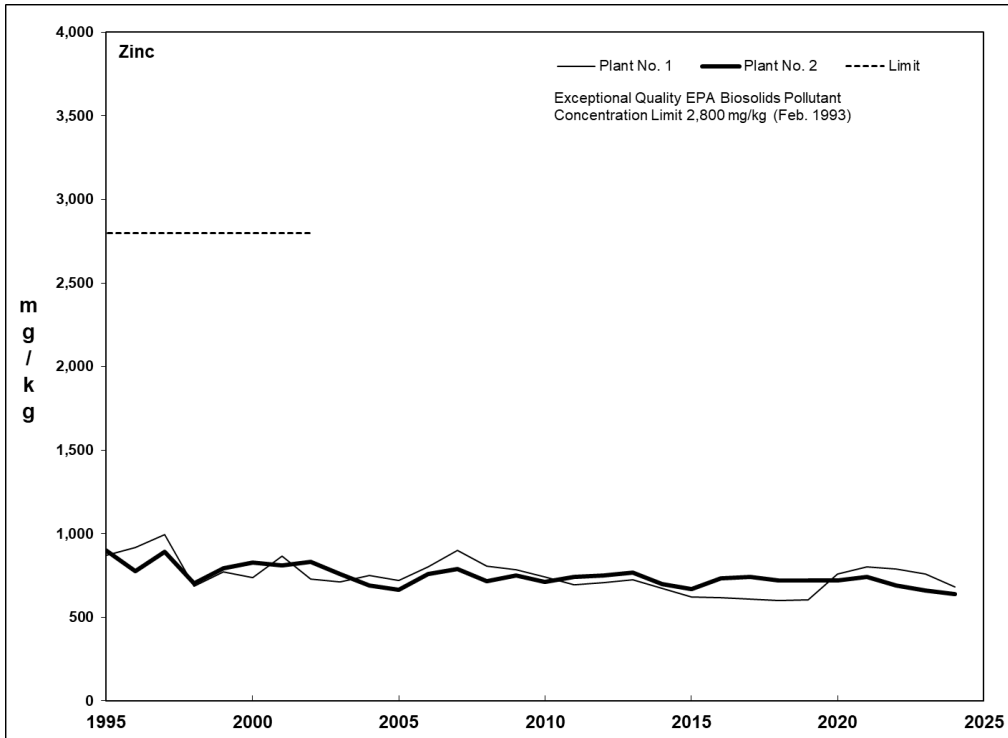


Figure 8-10 Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2023/24
Orange County Sanitation District

Chapter 9. Non-Industrial Source Control and Public Education Programs

9.1 Introduction

OC San's approved Pretreatment Program was designed to address conventional pollutants which may impact OC San and its collection system, treatment works, workers, and compliance with its permits. The program also ensures that OC San can successfully implement its reuse initiatives, which had primarily included biosolids land application and some water reclamation through OCWD's Interim Water Factory 21. Since the early 2000s, OC San became involved with new programs, such as the Dry Weather Urban Runoff Diversion Program to assist Municipal Separate Storm Sewer System (MS4) permittees in helping keep our oceans clean and open for the public to use safely. OC San also continued its partnership with OCWD and replaced the Interim Water Factory 21 with the Groundwater Replenishment System (GWRS), which started producing nearly 70 MGD of reclaimed water a day starting in 2008. As a result of these new programs and more stringent requirements and regulations, OC San expanded the Pretreatment Program to also address non-industrial sources and nonconventional pollutants of concern. The expansion resulted in the formation of the Non-industrial Source Control (NISC) Group as a part of the Pretreatment Program. Over time, the NISC Group implemented projects and initiated programs to address emerging concerns or issues. Based on the program's goals and timing, the projects were incorporated into other parts of OC San's existing operations or were terminated when the need had been addressed. The current, active NISC programs are listed in Table 9.1.

Table 9.1 Non-Industrial Source Control Programs, FY 2023/24 Orange County Sanitation District	
Programs	
Fats, Oils and Grease Control	
Radiator Repair Shops	
Dry Cleaners	
Dry Weather Urban Runoff Diversions	
Dental Amalgam	

9.2 Fats, Oils, and Grease (FOG) Control Program

9.2.1 Fats, Oils, and Grease Control

Background

A frequent cause of sanitary sewer overflows (SSOs) is grease accumulation in the small- to medium-sized sewer lines typically owned and operated by cities and local sewerage agencies. In April 2002, the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) issued Order No. R8-2002-0014, General Waste Discharge Requirements (WDR), which required Orange County cities and sewerage agencies, known as WDR Co-Permittees, to monitor and control SSOs. Specifically, the order required WDR Co-Permittees to develop a Sewer System Management Plan (SSMP), one element of which was a Fats, Oils, and Grease Control Program (FOG Control Program). On November 17, 2004, OC San passed FOG Ordinance No. OCSD-25 establishing the legal authority to prohibit food service establishments (FSEs) from discharging FOG to the sewer system. OC San implemented its FOG Control Program for FSEs in its direct service area starting January 1, 2005.

In May 2006, the State Water Resources Control Board (SWRCB) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003 (Statewide WDR), which required a similar effort statewide. In December 2006, the SARWQCB rescinded its WDR in lieu of the Statewide WDR. OC San submitted its SSMP to the SWRCB in May 2009. On December 6, 2022, Order WQ 2022-0103-DWQ was issued, superseding the previous State Water Resources Control Board Order 2006-0003-DWQ. OC San completed its most recent audit of the SSMP in May 2024, and is

due for its next audit in May 2027. 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 2023/24.

Program Administration

The commercial FOG Control Program is administered through a combination of permitting, inspection, compliance tracking, report monitoring, and enforcement. The main elements of the FOG Control Program include:

1. Ordinance No. OCSD-25 – Fats, Oils, and Grease Ordinance for Food Service Establishments,
2. FOG Wastewater Discharge Permits to define and communicate permittees' responsibilities regarding FOG discharges,
3. Required Best Management Practices (BMPs) to minimize FOG-bearing wastewater discharges,
4. Installation and/or required maintenance of grease interceptors (GIs) when applicable,
5. Semi-annual monitoring of BMP implementation and GI maintenance,
6. Screening and evaluation of all inspection and monitoring reports to identify violations and/or deficiencies,
7. Inspection of FSE facilities to verify compliance, and
8. Enforcement Response Plan to respond to violations in a consistent and timely manner.

Permitting

OC San conducted an examination of the FOG trouble spots, as well as an inspection of the FSEs in the service area to collect operational information. A scheme was developed to categorize the distinct types of facilities based upon their potential to discharge FOG, the need to enforce the regulatory requirements of the FOG Ordinance, and the potential of each FSE to impact known or potential trouble spots. Using the combination of inspection data and trouble spot information, FSEs were categorized into the following six groups:

- Category 1: FSEs with a GI installed.
- Category 2: FSEs without a GI installed, that are a significant contributor to a FOG trouble spot, and probably need to install a GI due to their FOG impact to the sewer.
- Category 3: FSEs without a GI installed, that are considered a less significant contributor to a FOG trouble spot but may still need to install a GI in the future due to their proximity to a trouble spot.
- Category 4: FSEs without a GI installed, that are not considered a significant contributor of FOG, are not upstream of a trouble spot, and probably will not need a GI installed.
- Category 5: FSEs found to be an insignificant source of FOG that will not be required to have a permit.
- Category 6: Commercial property owners that maintain a GI common to multiple FSEs.

After creating the six categories and examining the FSEs' operations and discharge configurations, different FOG Wastewater Discharge Permit (permit) alternatives were needed to cover the various conditions encountered. The six categories eventually produced three permit variations. Type 1 covers FSEs that have FOG pretreatment, typically considered to be a below-ground GI. Type 2 is issued to FSEs without pretreatment, i.e., Categories 2, 3, and 4. Type 2 permits include a conditional waiver from the FOG pretreatment requirement, as mandated for all FSEs by OC San's FOG Ordinance. The third permit variation, Type 6, was developed for the strip mall or food court owners who have several FSEs plumbed to a common GI. Type 6 permits only require GI maintenance and do not include any BMP requirements. The individual FSEs connected to the common interceptor at a Type 6 location are still issued a Type 2 permit that requires BMP implementation.

OC San governs only FSEs that discharge directly into OC San trunklines in specific areas in the City of Orange and relies on the cooperation and resources of the 27 satellite cities and agencies to maintain the smaller laterals and to implement FOG control programs for the FSEs that discharge directly to the local collection systems.

Identifying, locating and monitoring commercial and industrial facilities in OC San's service area is accomplished by working with its member agencies on an ongoing program (Industrial Waste Survey – IWS) to collect semi-annual data on all new and renewed business licenses to identify new companies that may be subject to Federal Categorical Standards or local limits. Staff also use data submitted by the City of Orange, as well as monthly permitting data posted by Orange County Health Care Agency (OCHCA) to identify new FSEs. If deemed necessary after inspection by OC San staff, OC San FOG Wastewater Discharge Permit Applications are generated from the lists and forwarded to all new FSEs.

OC San staff also conducts quarterly visits of all parcels under OC San's FOG Control Program jurisdiction to identify new or changing FSEs. Changes may include a new menu or new construction, which can contribute to an increase or decrease in FOG production.

Permits are currently issued for two-year terms. Prior to permit renewal, the FSE is required to complete and submit an updated permit application and pay the permit application fee. Ownership changes also trigger the issuance of a new permit as the permit is non-transferrable. During FY 2023/24 OC San managed thirty-five (35) FOG permits with one (1) permittee going out of business, one (1) permittee undergoing a change in ownership and one (1) permittee undergoing a name change during the fiscal year. Three (3) new permittees were identified, and draft permits are currently being reviewed.

During this monitoring period one (1) permittee's oversight transferred to East Orange County Water District (EOCWD) after it was determined the facility was connected to EOCWD local sewer lines.

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 with permit requirements.

Inspection

Regular FSE inspections are an integral and essential part of the FOG Program, because they serve as a regulatory reminder to implement the required BMPs, and for FSEs with no GIs to maintain their FOG pretreatment devices. Every inspection presents an opportunity to provide educational outreach to the FSE community by further reinforcing the importance of the kitchen BMPs and strengthening the cooperative effort ultimately needed to effectively control FOG discharges to the sewer. The FOG program includes two distinct types of inspections, 1) a kitchen BMP inspection conducted by the Orange County Health Care Agency (OCHCA), and 2) a compliance inspection conducted by OC San staff. The verification that GIs are periodically pumped out and in compliance with the Twenty-five Percent (25%) rule (total depth of the floating grease layer plus the settleable solids layer shall not exceed 25% of the total liquid depth of the GI) is primarily accomplished through the *Semi-Annual GI Wastehauling Report* submittals.

Compliance

Violation of a permit requirement or provision of the FOG Ordinance, or the failure to submit a required report can lead to issuance of a Corrective Action Notice (CAN). The CAN is followed by a Notice of Violation (NOV) which includes the assessment of noncompliance fees if the deficiency is not corrected in a timely manner.

FOG Program Effectiveness

Monitoring the effectiveness of the FOG program enables OC San to refine its program implementation as necessary to comply with its requirement to eliminate preventable SSOs. OC San uses a GIS to analyze the relationship between trouble spots, FSEs, and SSOs. Areas of concern are evaluated and prioritized based on the impact of FSE proximity, tributary residential density, and FOG accumulation in the sewer

line, as determined by both CCTV and field crew observations. OC San coordinates with the Operations and Maintenance staff to maintain an effective commercial FOG program by keeping trouble spots under surveillance and following up on grease accumulations before they reach a critical stage. Table 9.2 summarizes the SSO data from the past two reporting periods. This data demonstrates the effectiveness of the FOG program at reducing the frequency of SSO events.

Table 9.2 FOG Program Effectiveness, FY 2023/24 Orange County Sanitation District		
Spills	FY 2022/23	FY 2023/24
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	1*
Total FOG-related spills	0	1
* Yum Dumpling Inc. 3910 E. Chapman Avenue, Orange, CA		

Enforcement

On February 29, 2024, a grease interceptor overflow occurred at an unpermitted FSE which resulted in a 15–20-gallon grease discharge into an adjacent cul-de-sac. All volume was contained downstream at an adjacent apartment complex. FSE staff conducted immediate clean up and no discharge entered any storm drain. A compliance inspection followed to understand why the grease discharge occurred. OC San found that the FSE had a change in ownership and operation. As a result, although the previous facility did not require a FOG Control permit, the new FSE did, and the FSE is currently in the permitting process.

9.3 Radiator Repair Shops

The Radiator Repair Shop Certification Program aims to prevent heavy metal-bearing liquids, oil and grease, spent antifreeze/coolant, as well as any other hazardous wastes from being discharged to the sewer. The program requires shops that rebuild and repair radiators to biennially certify the following:

- No industrial wastewater or spent antifreeze/coolant is discharged to the sewers,
- Floor drains are permanently sealed and secured from spills or accidental discharges,
- Water recycling systems are close-looped with no connection to the sewer, and
- Wastehauling records are maintained onsite and available for review upon request.

At the beginning of FY 2023/24, the Radiator Repair Shop Certification Program contained ten (10) radiator shops. In Fall 2023, OC San required these ten radiator shops to complete another self-certification statement. Following submission of these forms, OC San staff conducted verification inspections in Spring 2024 and found one facility was no longer in business, leaving nine (9) radiator shops in the program at the end of the reporting period. OC San is in the process of suspending this program pending planning with the Regional Board. It is anticipated this program will remain suspended in the coming fiscal year.

9.4 Dry Cleaners

Initially implemented to prevent soil and groundwater contamination by perchloroethylene (PERC), the Dry Cleaner Certification Program was revitalized as an important outreach tool to help protect the GWRS. The program tracks the solvent usage and facility ownership within the dry cleaner community to prevent the discharge of solvent-containing wastes from dry cleaning operations. Rather than just examining the spent solvent disposal, additional emphasis is placed on the contaminated water from the solvent/water separator,

which is typically managed by either wastehauling offsite or by performing onsite evaporation. The program requires dry cleaning establishments to certify annually the following:

1. No waste solvent is discharged to the sewer,
2. Dry cleaning machines and auxiliary equipment are not connected to the sewer,
3. Floor drains are secured from spills and accidental discharges,
4. Solvent waste is wastehauled for offsite disposal in accordance with all applicable laws, and
5. Solvent-contaminated separator water is wastehauled and/or evaporated.

Certification forms are mailed to every dry-cleaning facility at the beginning of the annual cycle. After the completed certifications are returned, audit inspections are conducted to verify the information. Dry cleaning facilities must maintain their wastehauling records onsite and make them available for review during inspection. Although all active facilities and garment collection facilities with equipment onsite receive a certification form, only PERC users are routinely inspected by OC San. At the end of FY 2021/22, there were a total of two hundred forty-eight (248) dry cleaning facilities in the OC San Dry Cleaner Certification Program, of which 40 were known as of the last oversight inspections to have been using PERC onsite.

During the FY 2020/21 certification cycle, OC San deferred PERC facility inspections because as of January 1, 2021, all PERC dry cleaning systems within the South Coast Air Quality Management District (SCAQMD) were to have been removed from service by physically removing the machine or by disconnecting utilities (electric, steam lines) to the machine and draining all PERC from the machine tanks. Despite the regulatory deadline, SCAQMD offered dry cleaning facilities an opportunity to request a hardship variance. Several facilities in OC San's service area were granted a variance with the last permissible onsite use extended until June 2021.

In FY 2021/22, once SCAQMD's variance period ended, with anticipation that reasonable potential for PERC discharge from the drycleaners would no longer exist, OC San commenced program closure inspections at the certification program's 40 known PERC dry cleaning facilities. Following closure inspections and SCAQMD enforcement actions that spanned FY's 2021/22 and 2022/23, all forty (40) facilities have stopped the use of PERC-containing systems or closed down. Since the reasonable potential for pollutant discharge is believed to no longer exist, no program certifications or inspections took place during the reporting period. OC San is in the process of closing this program pending planning with the Regional Board. It is anticipated the full closure of this program will take place in the coming fiscal year.

9.5 Dry Weather Urban Runoff Diversions

OC San accepts the diversion of Dry Weather Urban Runoff (DWUR) 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 DWUR 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 DWUR 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 DWUR to the sewer system until the total volume of all runoff discharges exceeded 4 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 4 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 4 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 DWUR from 4 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 DWUR discharge to the sanitary sewer which might assist the MS4 permittees addressing environmental problems caused by DWUR, 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 DWUR combined.

The County of Orange is the principal permittee that coordinates the OCFCD and the regulated cities’ efforts in implementing the Water Quality Management Plan required by the NPDES Permit for discharge of urban stormwater. Before a diversion is implemented, the proposed project is presented to the Orange County Stormwater Program Technical Advisory Committee (TAC). The committee evaluates the proposal, and if approved by the TAC, the TAC puts the diversion on its Dry Weather Diversion Priority List. This approval step ensures that OC San’s Dry Weather Urban Runoff Diversion Program’s limited capacity is effectively utilized to improve coastal water quality.

Once the TAC accepts a new diversion proposal, OC San initiates with the responsible entity an *Agreement for Dry Weather Urban Runoff Discharge* to govern sanitary sewer service to the diversion project. In some cases, the entity is a partnership of several responsible municipalities, special districts, and the County of Orange. The agreement cites the reasons that the discharge is being accepted and details the responsibilities of the entity, or agency, that will be maintaining and operating the diversion. The agreement stipulates that the quality and quantity of the Dry Weather Urban Runoff from the Drainage Area(s) represented in the agreement shall meet all terms, conditions, and discharge limits contained in OC San’s Ordinance and board resolutions.

In addition to the adoption of an Agreement, discharge for treatment and disposal from each diversion structure is only permissible under the terms and conditions of a DWUR 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, 21 active DWUR diversion structures are permitted, four operated by employees of the Orange County Public Works (OCPW), 11 owned and operated by the City of Huntington Beach (CHB), two owned and operated by the City of Newport Beach (CNB), three owned and operated by the Irvine Ranch Water District, and one owned and operated by PH Finance, who is the present owner of the Pelican Hill Resort.

In January 2024, OC San issued a new DWUR discharge permit to the Santa Ana Delhi diversion, owned by the Santa Ana Delhi Partnership and operated by employees of OCPW. Following the approval of the DWUR Agreement in May 2023, the Santa Ana-Delhi diversion DWUR discharge permit was issued, superseding the Special Purpose Discharge permit for the diversion to perform intermittent operations and maintenance testing from April 2023 to December 2023. It should be noted that the DWUR Agreement for the Santa Ana Delhi diversion is between OC San and the Orange County Flood Control District (OCFCD), a body corporate and politic established as required by the Orange County Flood Control Act. According to the Flood Control Act, OCPW employees are ex officio OCFCD employees for operation and maintenance of the Santa Ana Delhi diversion. With a maximum average daily discharge allowance of 1.94 MGD, the Santa Ana Delhi diversion is the largest DWUR permittee among all 21 diversions.

In March 2023, OC San received two DWUR discharge permit applications for two prospective diversions of CNB: Arches – Hoag and Arches – Old Newport Boulevard. OC San identified significant deficiencies with the facilities during permits review process and an onsite pre-permit inspection on June 8, 2023, OC San has been communicating with CNB about the deficiencies since June 2023. As of the end of FY 2024, OC San has not yet received revised permit applications for these prospective diversions.

In January 2023, CHB proposed and received approval from the TAC to add an additional diversion (CHB's Heil Stormwater Pump Station) onto the Dry Weather Diversion Priority List. Upon receiving the official TAC approval for CHB's Heil Stormwater Pump Station, OC San will work with CHB to initiate a Dry Weather Urban Runoff Discharge Agreement and support the permit application process.

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 2016/17 – 2023/24 Orange County Sanitation District		
FY	Million Gallons Discharged	Monthly Average Flow Range (MGD)
2017/18	461	0.29 – 1.90
2018/19	337	0.28 – 1.56
2019/20	480	0.44 – 2.06
2020/21	565	1.38 – 3.07
2021/22	383	1.17 – 2.02
2022/23	390	0.41 – 2.31
2023/24	690	0.00 – 5.24

The diversions cumulatively discharged 690 million gallons (MG) of DWUR, with a normalized discharge of 2.81 MGD, and a monthly flow range between 0 and 5.24 MGD. The surge of flow volume and normalized discharge in FY 2023/24 compared to the previous fiscal year was due to the addition of the Santa Ana Delhi diversion starting in January 2024.

Flows for the 11 CHB diversions in FY 2023/24 were 234 MG, almost the same as CHB total flows in FY 2022/23 of 233 MG. For the three existing active diversions of the County of Orange (Huntington Beach Channel, Santa Ana River Channel and Greenville Channel diversions), the total cumulative flow discharge increased from 23 MG in FY 2022/23 to 102 MG in FY 2023/24. Among these three diversions, the Greenville Channel diversion was the main contributor to the increase in discharge volume, with more than an order of magnitude increase in discharge volume from the Greenville Channel diversion alone (89 MG in FY 2023/24 compared to 6 MG in FY 2022/23). Since March 2023 and continuing through FY2023/24, the Huntington Beach Channel diversion remained offline for repair. Despite discharging only five months in FY 2023/24, the Santa Ana Delhi discharged a total of 159 MG, making it the biggest discharger of the Dry Weather Urban Runoff Discharge program. Flows from the three IRWD diversions, Muddy Canyon, Los Trancos Canyon, and Peters Canyon, increased 61 MG overall (183 MG in FY 2023/24 compared to 122 MG in FY 2022/23) primarily due to an increase in discharge from the Peter's Canyon diversion. The flow volume from the CNB diversions was similar to the previous fiscal year (9.44 MG in FY 2023/2024 compared to 9.40 MG in FY 2022/23). The Pelican Point Diversion flow slightly increased on a year-over-year basis (1.92 MG in FY 2023/24 compared to 1.87 MG in FY 2022/23).

Four of the 21 diversions flow to Plant No. 1: the Santa Ana Delhi diversion, 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 discharged exactly to Plant No. 1 and Plant No. 2. The remaining 18 diversions are located closer to the coast, flow to Plant No. 2, and have been available for reclamation since the completion of GWRS Final Expansion in December 2022. The Santa Ana Delhi, Santa Ana River and Peters Canyon diversions discharged a total of 271 MG to Plant No. 1 in FY 2023/24, and the remaining eighteen diversions discharged 419 MG to Plant No. 2 in FY 2023/24. Total

Dry Weather Urban Runoff flows diverted to the OC San's collection system in FY 2023/24 contributed up to 57 MG per month to GWRS.

If current discharge trends continue, OC San expects to receive between 350 MG and 750 MG next fiscal year from the existing diversions. During the past 25 years, OC San treated over 11 billion gallons of DWUR 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 \$15.8 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 DWUR.

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 2023/24 Orange County Sanitation District					
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	0.218
2	Newland Diversion	8612 Hamilton Street	Coast (via Atlanta Interceptor)	Plant No. 2	0.281
3	Banning Diversion	2201 Malibu Lane	Miller-Holder	Plant No. 2	0.115
4	Hamilton Diversion	10101 Hamilton Avenue	Miller-Holder	Plant No. 2	0.099
5	Adams Diversion	19661 Chesapeake Lane	Miller-Holder	Plant No. 2	0.082
6	Indianapolis Diversion	9221 Indianapolis	Miller-Holder	Plant No. 2	0.059
7	Scenario Diversion ²	4742 Scenario Drive	Knott	Plant No.1 & No. 2 [^]	0.034
8	1 st Street CDS	103 Pacific Coast Hwy	Coast	Plant No. 2	0.004
9	Meredith Diversion	20192 Mainland Lane	Miller-Holder	Plant No. 2	0.023
10	Flounder Diversion	9731 Flounder Drive	Bushard	Plant No. 2	0.016
11	Yorktown Diversion	9211 Yorktown Avenue	Miller-Holder	Plant No. 2	0.013
<i>Owned and Managed by the County of Orange</i>					
12	Santa Ana Delhi ^A	20317 Irvine Avenue	Baker-Main	Plant No. 1	0.634
13	Greenville-Banning Channel ^B	2501 Placentia Avenue	Interplant	Plant No. 2	0.356
14	Huntington Beach Channel ^C	8092 Adams Avenue	Coast (via Delaware)	Plant No. 2	0
15	Santa Ana River ^D	10844 Ellis Avenue	Sunflower	Plant No. 1	0.049
<i>Owned and Managed by Irvine Ranch Water District</i>					
16	Los Trancos Diversion	Pacific Coast Highway (Crystal Cove State Park)	South Coast	Plant No. 2	0.228
17	Muddy Canyon Diversion	Pacific Coast Highway (El Moro State Park)	South Coast	Plant No. 2	0.110

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2023/24 Orange County Sanitation District					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) ¹
18	Peters Canyon Diversion	3001 Main Street	Main Street	Plant No. 1	0.402
Owned and Managed by the City of Newport Beach					
19	Newport Dunes Diversion (Gravity Flow)	1131 Back Bay Drive	South Coast (via Back Bay)	Plant No. 2	0.004
20	Mid Big Canyon	1951 Jamboree Road	South Coast (via Back Bay)	Plant No. 2	0.039
Owned and Managed by PH Finance, LLC					
21	Pelican Point Diversion	36 Pelican Point Drive	South Coast	Plant No. 2	0.009
Sum of the Average Daily Discharges (FY 2022/23)					2.807
*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					
² Scenario flows to Plant No. 1 and Plant No. 2 simultaneously due to Bushard-Ellis junction box.					
A. Santa Ana Delhi System offline Sep – Nov 2023, Jan – Apr 2024					
B. Greenville: System offline Jan – Apr 2024					
C. Huntington Beach Channel: System offline Jul 2023 – Jun 2024					
D. Santa Ana River: System offline Jan – Apr 2024, Jun 2024					

Table 9.5 summarizes several significant Dry Weather Urban Runoff Program statistics.

Table 9.5 Dry Weather Urban Runoff Diversion Program, FY 2023/24 Orange County Sanitation District	
Number of new permits generated	1 permit(s)
Number of permitted diversions	21 diversions
Total average daily discharge	2.81 MGD
Monthly average daily discharge range	0 – 5.24
Newly proposed diversions	3 diversions
Estimated combined discharge for proposed/pending diversions	2.9 MGD
Maximum combined Dry Weather Urban Runoff discharge allowance	10 MGD
*Resolution No. 13-09 accommodates 10 MGD of Dry Weather Urban Runoff without cost to permittees.	

9.5.2 Proposed Dry Weather Urban Runoff Diversion Systems

The CNB's Arches Diversion project consists of two diversions near the intersection of Newport Boulevard and Pacific Coast Highway. The Arches Diversions are projected to discharge up to 0.1 MGD to OC San's Plant No. 2. In FY 2022/23, OC San's Resource Protection Division reviewed two rounds of Dry Weather Urban Runoff Discharge permit applications and conducted pre-permit inspections for the Arches diversions. OC San identified several deficiencies in the permit applications and during the pre-permit inspections. OC San has been working to support CNB in preparing the permit applications and resolving the identified deficiencies.

In FY 2019/20, OC San learned during meetings to address the Newport Bay TMDL issues that at least two new flood control channel diversions were being proposed: the Santa Isabel and East Costa Mesa Channel diversions. To date, OC San has not been approached to incorporate these diversions into an existing agreement or to develop and execute an additional agreement for the drainage basins these channels serve. In March 2022, CHB inquired about converting their existing Heil Stormwater Pump Station into a Dry Weather Urban Runoff Diversion facility, which was approved by the TAC as the most current addition in the Dry Weather Diversion Priority List. OC San is working with CHB to initiate a Dry Weather Urban Runoff Discharge Agreement and to support the permit application process.

In addition, continuing the past two fiscal years, modifications to the Newport Dunes diversion remained under consideration; Although CNB provided OC San a rehabilitation proposal, the proposal was not accepted as presented and must be resubmitted in accordance with a Special Condition in the Dunes DWURD permit renewal issued February 2023.

9.5.3 Dry Weather Urban Runoff Quality

OC San requires self-monitoring of the DWUR discharges and conducts semi-annual sampling and analysis to ensure discharge limit compliance for various regulated constituents. Overall, the monitoring of the Dry Weather Urban Runoff discharges shows very consistent compliance with OC San's local limits. Although OC San no longer has a local limit for TTOs since the adoption of Ordinance No. OCSD-48 in 2016, the Resource Protection Division continues to monitor for TTOs as a safety measure to screen for pollutants of concern.

Monitoring results for metal constituents were all within local discharge limits.

Table 9.6 summarizes the minimum and maximum concentrations detected in DWUR during the reporting period. OC San's latest instantaneous discharge limits are included for comparison.

Table 9.6 Dry Weather Urban Runoff Compliance, FY 2023/24 Orange County Sanitation District			
Constituent	Minimum Concentration Reported (mg/L)	Maximum Concentration Reported (mg/L)	Instantaneous Discharge Limit (mg/L)
Ammonia N	ND (< 0.087)	4.85	None
BOD	ND (< 0.35)	220	None
TSS	ND (1.3)	67	None
Cadmium	ND (1.81×10^{-3})	0.048	1.0
Chromium	ND (1.5×10^{-4})	0.023	20.0
Copper	ND (1.44×10^{-3})	0.243	3.0
Lead	ND (2.1×10^{-4})	0.015	2.0
Molybdenum	ND (5×10^{-3})	0.318	2.3
Nickel	ND (7.0×10^{-4})	0.211	10.0
Selenium	ND (2.1×10^{-3})	0.069	3.9
Zinc	ND (3.29×10^{-3})	0.285	10.0
Oil & Grease Min.	ND (0)	3.00	100.0
Pesticides	ND (0)	0	0.01

*ND = not detectable (below analytical detection or reporting limits)
mg/L = milligrams per liter

OC San's Dry Weather Urban Runoff Diversion Program continues its success in helping to maintain the quality of the receiving waters along the Orange County coastline. Once again, Orange County's beaches have received very favorable ratings from Heal the Bay's annual report with a dominant presence of nine

beaches in the Honor Roll⁴. Summer Dry Grades were close to the five-year average with 95% of beaches receiving A or B grades. Wet weather grades well exceeded the five-year average with 89% of the beaches receiving A and B grades. Winter Dry Grades were good with 91% of the beaches receiving A and B grades. Orange County received nineteen (19) inches of rain, which is 94% higher than the historical average of ten (10) inches. The substantial increase in rainfall did not appear to have a negative impact on Wet Weather Grades¹.

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, and most recently Santa Ana Delhi. Constructed to reduce selenium-laden waters reaching the Upper Newport Bay, these diversions enhance the estuarine environment for the threatened and endangered species that inhabit the area. Based upon the County of Orange's estimate, diversion of the various Peters Canyon Wash and Big Canyon tributaries would decrease the amount of selenium reaching the bay by 150 to 250 pounds annually. Based upon the flow and monitoring data received for the Peters Canyon, Mid Big Canyon and Santa Ana Delhi diversions, as much as 46 pounds of selenium were diverted from the bay during the FY 2023/24 reporting period.

This rerouting of DWUR from stormwater pump stations, flood control channels, and natural conveyances before it reaches receiving waters, allows OC San to assist with regional public health and water quality protection alongside its primary function of maintaining high quality collection, treatment, and disposal of wastewater. In this manner, the program assists in providing vital protection to the Areas of Special Biological Significance along Orange County's coastline.

9.5.4 Dry Weather Urban Runoff Diversion Locations

The diversion systems are located in four different watersheds in Orange County: Anaheim Bay – Huntington Harbor, Lower Santa Ana River, Newport Bay, and Newport Coastal. These watersheds encompass a variety of designated land uses, such as residential, commercial, industrial, and agriculture.

9.5.5 Dry Weather Urban Runoff Diversion Enforcement Actions

City of Newport Beach (CNB)

In FY 2023/24, OC San continued to communicate with CNB regarding reporting deficiencies and non-compliance issues which carried over from the previous fiscal years of 2021/22 and 2022/23. Examples of non-compliance issues include failure to submit overdue documents required under permit conditions, discharge of DWUR during rain events, and failure to conduct flow-meter calibration. Examples of reporting deficiencies include failure to provide meter readings with correct unit and failure to provide sufficient explanation for misaligned, inconsistent reported information. By the end of the reporting period, CNB had not yet reported completed corrective actions and submitted overdue required documents. OC San will continue to pursue completion of the corrective actions in the next reporting period.

City of Huntington Beach (CHB)

In FY 2023/24, CHB successfully completed the installation of lockable shutoff devices at all eleven diversions as required by special conditions of CHB's DWURD permits. CHB also provided OC San with proper keys, codes, and alternative methods to access the diversion facilities and equipment. OC San and CHB are currently working together to resolve other on-going enforcement activities. OC issued two notices of violations in response to two significant 1st CDS Unit diversion reporting deficiencies: another flow meter totalizer reset in November 2023 and reported discharge in February 2024 during consecutive rain events (a prohibited discharge period). CHB provided explanations for the deficiencies and proposed a corrective

⁴ Heal the Bay. 2023. 2022-2023 Beach Report Card. Accessed from: healthebay.org/wp-content/uploads/2024/07/Beach-Report-2023-2024_screen.pdf

action plan. In the next reporting period, OC San intends to request information and clarification regarding CHB's proposed corrective actions plan and to resolve additional reporting deficiencies triggered by the CHB's deficiency explanations. OC San issued a notice of violation regarding CHB's other ten diversions due to overdue in-situ effluent meter hydraulic calibration reports. Additionally, in the next reporting period, OC San will continue implementing progressive enforcement to address deficiencies with monthly Daily Discharge Flow Report (DDFR) submission.

Orange County Public Works (OCPW/OCFCD)

In reviewing Santa Ana-Delhi's May and June 2024 MMRRs and DDFRs, OC San identified the diversion repeatedly exceeded the permitted 1.94 MGD Maximum Average Daily Discharge Allowance (MADDA), per the Agreement between OC San and OCFCD. OC San intends to issue a notice of violation for these exceedances to OCFCD and require immediate corrective actions to ensure long-term compliance with the MADDA value. Additionally, OCFCD failed to submit its Facility Inspection & Maintenance procedures and its wet weather deactivation & reactivation procedures as required in the Santa Ana-Delhi DWURD permit conditions. In the next reporting period, OC San intends to issue a notice of failure to submit for these missing reports.

PH Finance, LLC

In November 2023, OC San issued a request for information to Pelican Point to explore deficiencies identified in the multiple MMRRs submittals within the past two fiscal years. Pelican Point submitted a corrective action plan that included resubmitting the MMRRs with corrected meter readings and sufficient explanation for the original issues and valid reasons for the modifications in the revised reports, conducting an in-situ hydraulic re-calibration for the diversion's effluent flow meter, and implementing new standard operating and reporting procedures to ensure long-term compliance with OC San's reporting requirements. OC San will continue to enforce the monthly DDFRs reporting requirements in the next reporting period.

9.6 Dental Amalgam Source Control Program

On June 14, 2017, the US EPA published technology-based pretreatment standards under the Clean Water Act to reduce discharges of mercury from dental offices into Publicly Owned Treatment Works. The new Dental Office Point Source category requires dental offices to utilize amalgam separators and implement two BMPs. The Dental Office Point Source category became effective on July 14, 2017.

New dental facilities opened on or after July 14, 2017, designated Pretreatment Standards New Sources (PSNS), must immediately comply with pretreatment standards, including the installation of amalgam separators. A one-time compliance report must be submitted to OC San no later than 90 days following the introduction of wastewater to OC San. Although PSNS does not include the purchase of an existing dental facility, those facilities changing ownership must also submit their report no later than 90 days following the transfer. Existing facilities designated as Pretreatment Standards Existing Sources that started before July 14, 2017 without amalgam separators on June 14, 2017, must install amalgam separators by July 14, 2020, and submit their one-time compliance reports by October 12, 2020. Existing dental facilities with amalgam separators on June 14, 2017, must replace those separators by June 14, 2027, or whenever the amalgam separator needs to be replaced, whichever is earlier.

To conform to this federal pretreatment program requirement, OC San implemented a Dental Amalgam Source Control Program to enable the dental offices to comply with this new regulation. OC San developed and posted Dental Office Point Source category information on the OC San website (www.ocsan.gov) complete with links to the US EPA's development document, effluent guidelines, fact sheet, and the applicable dental category regulation. This information was present on the website as of August 2017. Two compliance report forms were developed for the dental facilities: a comprehensive form for facilities that place or remove amalgam, and a second exempt/limited form for facilities that only remove amalgam on a limited or emergency basis. The forms were first made available in September 2017, and a new form, combining the exempt and non-exempt forms was made available in May 2022.

As required by the regulation, OC San implemented procedures for receiving, reviewing, and retaining dental office compliance reports. OC San has conducted multiple mass mailings to dental offices in OC San's service area since January 2018. As of the end of this reporting period OC San has received and

processed 2,000 reports. OC San is currently assisting nonresponding and new dental offices with their report submittal and by follow up emails, phone calls and on-site visits. These activities are ongoing.

OC San continues to explore using automation to support the Dental Amalgam Program.

9.7 Public Education and Outreach

In addition to the public education and outreach conducted by OC San's Public Affairs Office, Resource Protection Division staff routinely work with OC San's Member Agencies; attend interagency and professional organization meetings, conferences, and workshops; serve on committees, and make presentations. Working with other agencies and professional organizations benefits OC San by helping OC San keep abreast of potential future regulations and trends which may be beneficial or have impacts that OC San must prepare for, as well as providing information to the public about OC San's programs.

Appendix A. Monitoring and Compliance Status Report

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
A & G Electropolish	1-531422	18330 Ward St, Fountain Valley, CA 92708	332813	433.17(a)	4	20	8			
A & K Deburring and Tumbling, Inc.	1-511362	2008 S.Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	4	24	4			
A & R Powder Coating, Inc.	1-021088	1198 N.Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	2	8	0			Class 1 Permit Deactivated
AbbVie Inc.	1-602206	18667 Teller Ave, Irvine, CA 92612	325412	439.17	0	0	0			New Class 1 Permit Issued
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	4	65	20			
Accurate Circuit Engineering	1-011138	3019 S. Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	28	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)	10	44	59	Zinc		
Advanced Thermal Sciences Corporation	Z-600654	3355 E.La Palma Ave, Anaheim, CA 92806	336413	433.17(a)	0	0	0			
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave, Garden Grove, CA 92841	332722	403.5(d)	5	16	7			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St, Garden Grove, CA 92841	332722	433.17(a), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(h), 471.35(i), 471.35(k), 471.35(l), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(y), 471.35(z), 471.65(f), 471.65(g), 471.65(h), 471.65(j), 471.65(l), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(u), 471.65(w), 471.65(x)	8	49	61	Cadmium, CN, Fluoride, Nickel	Published as SNC for discharge violation(s)	
All Metals Processing of Orange County, LLC	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	4	43	20			
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	4	59	17		Published as SNC for reporting violation(s)	
Allied Electronics Services, Inc.	1-011073	1342 E. Borchard, Santa Ana, CA 92705	334412	433.17(a)	5	27	8	pH		

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325611	417.166, 417.176, 417.66, 417.86	4	23	5	Zinc	Published as SNC for discharge violation(s)	
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	6550 Caballero Blvd, Buena Park, CA 90620	331523	464.16(a), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	4	27	29	Zinc		
Alloy Tech Electropolishing, Inc.	1-011036	2220 S. Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	4	18	8	Molybdenum		
AlSCO, Inc. dba AlSCO Uniforms	1-021656	1755 S. Anaheim Blvd, Anaheim, CA 92802	812331	403.5(d)	4	25	17	O&G min.		
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E. Alton Ave, Santa Ana, CA 92707	332112	467.46, 471.65(i), 471.65(j)	4	28	22			
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Ave, Santa Ana, CA 92704	332112	467.45	4	24	10			
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	4	28	22	Copper, Zinc	Published as SNC for discharge violation(s)	
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave, Santa Ana, CA 92704	332112	467.46	4	20	10			
Amerimax Building Products	1-021102	1411 N. Daly St, Anaheim, CA 92806	332812	465.35	6	33	7			
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	4	22	0			
AMS Coatings, Inc	Z-602215	2102 S. Wright St, Santa Ana, CA 92705	332812	433.17(a)	0	0	0			New Zero Discharge Certification Issued

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	4	25	8			
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	5	22	24			
AnoChem Coatings	1-600295	1102 E. Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	4	40	8	Chromium, Copper, Nickel, Zinc		
Anodyne, Inc.	1-511389	2230 S. Susan St, Santa Ana, CA 92704	332813	433.17(a)	4	22	42			
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 W. Rowland St, Santa Ana, CA 92707	332813	433.17(a)	4	24	20			
APCT Anaheim	1-600689	250 E. Emerson Ave, Orange, CA 92865	334112	433.17(a)	4	38	20			
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	4	27	60	Copper		
ARO Service	1-021192	1186 N. Grove St, Anaheim, CA 92806	336411	433.17(a)	5	19	10			
Arrowhead Operating Inc.	1-601062	219 First St, Huntington Beach, CA 92648	211111	435.34(b)	6	21	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
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)	6	42	61	Fluoride, Nickel		
Astech Engineered Products (3)	1-602005	3030 Redhill Ave, Santa Ana, CA 92705	336412	433.17(a)	4	47	15			New Class 1 Permit Issued
Astech Engineered Products, Inc. (Bldg. 2 Outside) (2)	Z-602004	3030 Redhill Ave, Santa Ana, CA 92705	336412	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	1	0	0			New Zero Discharge Certification Issued
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	5	24	10			
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336412	433.17(a)	5	19	8		Published as SNC for reporting violation(s)	
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325412	439.17, 439.27	5	80	94	acetone		

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
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	43	10			
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	4	58	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	59	10			
B/E Aerospace Machined Products, Inc.	Z-601769	7155 Fenwick Ln, Westminster, CA 92683	336413	433.17(a)	1	0	0			
Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	4	22	8			
Baxter Healthcare Corporation	1-601951	17511 Armstrong Ave, Irvine, CA 92614	339112	428.56(a)	2	13	4			New Class 1 Permit Issued
BAZZ HOUSTON CO .	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	5	20	13	O&G min.	Published as SNC for discharge violation(s)	
Beckman Coulter, Inc.	1-521824	200 S. Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	4	17	7			
Beo-Mag Plating	1-511370	3315 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	29	28		Published as SNC for reporting violation(s)	
Beverage Visions LLC (Yorba Linda)	1-601449	24855 Corbit Pl, Yorba Linda, CA 92887	311421	403.5(d)	4	24	2			
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S. Placentia Ave, Placentia, CA 92870	311812	403.5(d)	6	21	4			
Bioduro LLC (Fairbanks)	1-601616	72 Fairbanks, Irvine, CA 92618	325412	439.47	4	54	34		Published as SNC for reporting violation(s)	

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Bioduro LLC (Jeronimo)	1-601617	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.52	4	54	27		Published as SNC for reporting violation(s)	
Black Oxide Industries, Inc.	1-021213	1735 N. Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	5	31	8			
Blower-Dempsay Corp. DBA Pacific Western Container	1-511371	4044 W. Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	4	16	4			Formerly Listed as Pacific Western Container
Blue Lake Energy	1-521785	5825 Casson Dr, Yorba Linda, CA 92886	211111	435.34(b)	5	18	4			
Blue Ribbon Container and Display, Inc.	1-601468	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	4	19	4			
Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	5	19	4			
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	4	22	8			
Brasstech, Inc	1-600316	1301 E. Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	4	18	7		Published as SNC for reporting violation(s)	
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221118	403.5(d)	5	28	3			
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	435.34(b)	5	18	6			
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	435.34(b)	6	29	4			
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	435.34(b)	5	29	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	5	37	4			
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	4	8	1			
Bristol Industries	1-021226	630 E. Lambert Rd, Brea, CA 92821	332722	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(f), 471.65(u), 471.65(w), 471.65(x)	5	51	124	Silver, Zinc		
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	405.86	4	20	4			
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	405.86	4	17	4			
Cadillac Plating, Inc.	1-021062	1147 W. Struck Ave, Orange, CA 92867	332813	433.17(a)	6	36	58			
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20			
Cali Chem Inc. dba Be Beauty	1-601976	14271 Corporate Dr, B Ste, Garden Grove, CA 92843	325620	417.86	5	27	6	O&G min.	Published as SNC for discharge violation(s)	
California Faucets	Z-331431	5231 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	0	0	0			
California Gasket and Rubber Corporation	1-521832	533 W. Collins Ave, Orange, CA 92867	339991	428.66(a)	5	26	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
CalNRG Operating, LLC	1-601486	2930 E. Frontera St, A Unit, Anaheim, CA 92806	211111	435.34(b)	4	16	6			
Cargill, Inc.	1-031060	600 N. Gilbert St, Fullerton, CA 92833	311225	403.5(d)	6	28	24			
Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	4	26	10			
CD Video, Inc.	1-511076	12650 Westminster Ave, Santa Ana, CA 92706	334613	433.17(a)	5	19	8			
Chromadora, Inc.	1-511414	2515 S. Birch St, Santa Ana, CA 92707	332813	433.17(a)	6	33	58			
Circuit Technology, Inc.	1-521821	1911 N. Main St, Orange, CA 92865	334112	433.17(a)	4	25	8			
City of Anaheim Public Utilities (Water Services WRF)	1-521843	210 S. Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	4	5	0			
City of Anaheim Public Utilities Department	1-021073	6751 E. Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	7	21	54			
City of Anaheim, Public Utilities Department	1-600296	3071 E. Miraloma Ave, Anaheim, CA 92806	22112	403.5(d)	4	22	2			
City of Fullerton (Public Works Department)	1-601835	1580 W. Commonwealth Ave, Fullerton, CA 92833	921190	403.5(d)	4	20	4			
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	435.34(b)	4	18	16			
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	4	21	16			
City of Tustin Water Service (17th St.)	1-071013	18602 E. 17th St, Santa Ana, CA 92705	221310	403.5(d)	4	21	2			
City of Tustin, Water Service (Main St)	1-071268	235 E. Main St, Tustin, CA 92780	221310	403.5(d)	1	0	0			Class 1 Permit Deactivated

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
CJ Foods Manufacturing Corp.	1-521849	500 S. State College Blvd, Fullerton, CA 92831	311824	403.5(d)	2	5	4			Class 1 Permit Deactivated
CJ Foods Manufacturing LLC	1-602061	500 S. State College Blvd, Fullerton, CA 92831	311824	403.5(d)	4	19	7	pH		New Class 1 Permit Issued
CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave, Costa Mesa, CA 92627	332911	433.17(a)	1	0	0			
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St, Huntington Beach, CA 92649	334412	433.17(a)	7	15	14			Class 1 Permit Deactivated
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave, Garden Grove, CA 92841	332812	433.17(a)	5	7	2			
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	4	34	8	pH		
Color Fashion Dye and Finishing, LLC	1-602149	1365 N. Knollwood Cir, Anaheim, CA 92801	313310	410.54	3	12	0			New Class 1 Permit Issued
Colores Powder Coating	Z-601858	2905 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	0	0	0			
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, Yorba Linda, CA 92886	211111	435.34(b)	6	17	4			
Continuous Coating Corp.	1-601999	520 W. Grove Ave, Orange, CA 92865	332812	433.17(a), 465.15	4	27	27			New Class 1 Permit Issued
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	435.33(b)	5	26	2		Published as SNC for reporting violation(s)	
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	4	21	12			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Corru-Kraft Fullerton	1-601450	1911 E. Rosslynn Ave, Fullerton, CA 92831	322211	403.5(d)	5	21	4			
CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	4	18	8			
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	5	20	6	O&G min.	Published as SNC for discharge violation(s)	
CPPG, Inc.	Z-321813	3911 E. Miraloma Ave, Anaheim, CA 92806	333999	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			
CRH California Water, Inc.	1-011051	502 S. Lyon St, Santa Ana, CA 92701	312112	403.5(d)	3	12	4			
Custom Enamellers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	4	36	8			
Cytec Engineered Materials	Z-600005	1440 N. Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	1	0	0			
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W. Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	4	20	4			
Dae Shin USA, Inc.	1-031102	610 N. Gilbert St, Fullerton, CA 92833	313310	410.56	5	23	0			
Darling Ingredients, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	5	25	8			
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	4	35	60			
Data Solder, Inc.	1-521761	2915 S. Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	26	7			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Dayton Flavors, Inc.	1-600038	580 S. Melrose St, Placentia, CA 92870	311930	403.5(d)	4	13	4			
Derm Cosmetic Labs, Inc.	Z-600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	1	0	0			
Diamond Environmental Services, LP	1-600244	1801 Via Burton None, B Unit, Fullerton, CA 92831	562991	403.5(d)	5	25	4			
DNR Industries, Inc.	Z-601019	1562 S. Anaheim Blvd, A&B Ste, Anaheim, CA 92805	811111	433.17(a)	1	0	0			
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave, Fullerton, CA 92833	311930	403.5(d)	6	22	4	pH		
Dr. Squatch Bricc City	1-602045	114 N. Berry St, Brea, CA 92821	325611	417.16, 417.76	3	7	0	O&G min.	Published as SNC for discharge violation(s)	New Class 1 Permit Issued
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	6	9	20			
DS Services of America	1-021393	1522 N. Newhope St, Santa Ana, CA 92703	312112	403.5(d)	4	1	0		Published as SNC for reporting violation(s)	
Ducommun Aerostructures, Inc.	1-021105	1885 N. Batavia St, Orange, CA 92865	336413	433.17(a)	4	29	28			
Dunham Metal Plating Inc.	1-601023	1764 N. Case St, Orange, CA 92865	332813	433.17(a)	4	29	20			
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	435.34(b)	5	29	8			
Eco Pure LLC	1-601406	1920 E. Warner Ave, Suite 3P, Santa Ana, CA 92705	812220	403.5(d)	4	12	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
EFT Fast Quality Service, Inc.	1-011064	2328 S. Susan St, Santa Ana, CA 92704	334112	433.17(a)	4	25	8			
Elasco Urethane, Inc.	1-602026	11377 Markon Dr, Garden Grove, CA 92841	325211	414.56, 463.26	4	10	2			New Class 1 Permit Issued
Electro Metal Finishing Corporation	1-021158	1194 N. Grove St, Anaheim, CA 92806	332812	433.17(a)	5	15	60			
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W. Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	42	34	Cadmium		
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	5	22	70			
Electron Plating III, Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	4	34	19		Published as SNC for reporting violation(s)	
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	4	31	20			
Embee Processing (Anodize)	1-600456	2148 S. Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 433.17(a)	5	32	24	CN	Published as SNC for discharge violation(s)	
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	29	16			
Emerald SoCal, LLC / Emerald Orange	1-601615	1575 N. Case St, Orange, CA 92867	812332	403.5(d)	6	22	4		Published as SNC for reporting violation(s)	
Excello Circuits, Inc. (Hunter)	1-601356	5330 E. Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	5	45	11	Sulfide		
Expo Dyeing and Finishing, Inc.	1-031322	1365 N. Knollwood Cir, Anaheim, CA 92801	313310	410.54	3	12	0			Class 1 Permit Deactivated

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Fabrica International, Inc.	1-011278	3201 S. Susan St, Santa Ana, CA 92704	314110	410.66	4	20	0			
Fabrication Concepts Corporation	1-011068	1800 E. Saint Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	5	15	8			Class 1 Permit Deactivated
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	6	27	8			
FMH Aerospace Corp.	1-600585	17072 Daimler St, Irvine, CA 92614	336413	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	4	34	72			
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	5	63	20			
Fullerton Custom Works, Inc.	Z-331424	1163 E. Elm Ave, Fullerton, CA 92831	332813	433.17(a)	3	0	0			
Gallade Chemical, Inc.	1-011257	1230 E. Saint Gertrude Pl, Santa Ana, CA 92707	424690	403.5(d)	4	18	4			
Gemtech Coatings	Z-600544	2737 S. Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	1	0	0			
Gemtech Coatings (Explorer)	1-601761	593 Explorer St, Brea, CA 92821	332812	433.17(a)	4	28	8			
GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	4	23	12			
Gold Coast Baking Company, Inc.	1-601700	1505 E. Warner Ave, Santa Ana, CA 92705	311812	403.5(d)	9	26	3	pH		Class 1 Permit Deactivated
Gold Coast Baking Company, LLC	1-602258	1505 E. Warner Ave, Santa Ana, CA 92705	311812	403.5(d)	0	0	0			New Class 1 Permit Issued
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	417.166	4	34	24	O&G min.		

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	5	22	4	pH		
Hannah Industries, Inc. DBA South Coast Water	1-511405	401 S. Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	4	20	6			Formerly Listed as South Coast Water
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336211	433.17(a)	6	30	22	Molybdenum	Published as SNC for discharge violation(s)	
Harry's Dye & Wash, Inc.	1-521746	1015 E. Orangethorpe Ave, Anaheim, CA 92801	313310	410.44, 410.54	4	22	12			
Hartwell Corporation	1-021381	900 Richfield Rd, Placentia, CA 92870	332999	403.5(d)	4	28	8			
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	435.34(b)	4	37	6			
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	4	33	30			
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell St, Orange, CA 92865	332813	433.17(a)	5	34	25			Class 1 Permit Deactivated
Hightower Plating & Manufacturing Co., LLC	1-602260	2090 N. Glassell St, Orange, CA 92865	332813	433.17(a)	0	0	0			New Class 1 Permit Issued
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	4	32	68			
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	311991	403.5(d)	4	21	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Howmet Global Fastening Systems Inc.	1-021081	800 S. State College Blvd, Fullerton, CA 92831	332722	433.15(a), 433.17(a), 467.46, 471.35(dd), 471.35(ff), 471.35(l), 471.35(r), 471.35(t), 471.35(u), 471.35(v), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(u), 471.65(w), 471.65(x)	4	50	27	CN,CN amen., Molybdenum		
HSH Interplan USA, Inc.	1-602179	1564 S. Anaheim Blvd, B Ste, Anaheim, CA 92805	238320	403.5(d)	2	0	0			New Class 1 Permit Issued
Hyatt Die Cast & Engineering Corporation	Z-331236	4656 Lincoln Ave, Cypress, CA 90630	331523	464.16(a), 464.16(b), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	1	0	0			
Ideal Anodizing, Inc.	1-021041	1250 N. Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	4	36	8			
Ikon Powder Coating, Inc.	1-521756	1375 N. Miller St, Anaheim, CA 92806	332812	433.17(a)	4	19	9			
Image Technology, Inc.	1-521755	1380 N. Knollwood Cir, Anaheim, CA 92801	325611	417.86	4	10	2			
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	405.86	4	21	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Independent Forge Company	Z-601008	692 N. Batavia St, Orange, CA 92868	332112	467.45	1	0	0			
Industrial Coating, Inc.	Z-601061	2990 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			
Industrial Metal Finishing, Inc.	1-521828	1941 Petra Ln, Placentia, CA 92870	332813	403.5(d)	4	16	6			
Intec Products, Inc.	1-021399	1145 N. Grove St, Anaheim, CA 92806	314999	410.46, 410.56	4	24	4			
International Paper Company (Anaheim)	1-521820	601 E. Ball Rd, Anaheim, CA 92805	322211	403.5(d)	4	15	8			
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	4	14	2			
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	4	19	4		Published as SNC for reporting violation(s)	
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	4	13	3			
Irvine Ranch Water District - DATS	1-011075	1704 W. Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	4	21	3			
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear None, Irvine, CA 92618	339112	403.5(d)	4	21	2			
J and J Operators LLC	1-601614	18962 Stewart Ln, Huntington Beach, CA 92648	211111	435.34(b)	6	21	4			
J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Ste, Newport Beach, CA 92663	336611	403.5(d)	5	16	6	Copper, Zinc		
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	4	32	20			
JD Processing, Inc. (West)	1-600978	2310 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	3	0	9			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Jellco Container, Inc.	1-021402	1151 N.Tustin Ave, Anaheim, CA 92807	322212	403.5(d)	5	19	6			
JOHN A. THOMAS - BOLSA OIL	1-031065	18701 Edwards St, Huntington Beach, CA 92648	211111	435.34(b)	5	33	8			
Joint Forces Training Base, Los Alamitos	1-031270	4230 Constitution Ave, 35 Bldg, Los Alamitos, CA 90720	928110	403.5(d)	4	21	2		Published as SNC for reporting violation(s)	
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	6	18	8			
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N. Anaheim Blvd, Anaheim, CA 92801	423930	403.5(d)	5	12	10	Cadmium		
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)	5	27	8			
Koia Anaheim Facility, LLC	1-601767	4940 E. Landon Dr, Anaheim, CA 92807	311421	403.5(d)	5	21	2		Published as SNC for reporting violation(s)	
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	2	11	0			Class 1 Permit Deactivated
Kryler Corporation	1-021428	1217 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	4	38	8			
La Habra Bakery	1-031029	850 S. Cypress St, La Habra, CA 90631	311812	403.5(d)	5	21	12	pH		
La Habra Plating Company	Z-331399	900 S. Cypress, La Habra, CA 90631	332813	433.17(a)	1	0	0			
Legrand DPC, LLC	Z-601203	1443 S. Sunkist St, Anaheim, CA 92806	423430	433.17(a)	1	0	0			Formerly Listed as Ortonics, Inc.
LGM Subsidiary Holdings LLC	1-601313	17802 Gillette Ave, Irvine, CA 92614	325412	439.47	4	59	24			
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	336413	433.17(a)	4	22	11			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Linco Industries, Inc.	1-021253	528 S. Central Park Ave, West , Anaheim, CA 92802	332812	433.17(a)	7	38	13	Cadmium, CN	Published as SNC for discharge and reporting violation(s)	
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	4	29	20			
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	0	1			Class 1 Permit Deactivated
M.S. Bellows	1-111007	5322 McFadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	4	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	334416	433.17(a)	4	22	8			
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	6	22	6			
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E. Rossllyn Ave, Fullerton, CA 92831	322211	403.5(d)	4	23	7			
Markland Manufacturing, Inc.	1-011046	1111 E. McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	8	32	9			Class 1 Permit Deactivated
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	4	13	4			
Maruchan, Inc. (Deere-South)	1-601021	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	4	12	4			
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, Irvine, CA 92618	311824	403.5(d)	4	13	8			
Marukome USA, Inc.	1-141023	17132 Pullman St, Irvine, CA 92614	311991	403.5(d)	4	20	4			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Master Wash, Inc.	1-511399	3120 Kilson Dr, Santa Ana, CA 92707	811192	403.5(d)	4	14	4			
MBV-CA, LLC	1-602131	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	2	11	0			New Class 1 Permit Issued
McKenna Labs, Inc.	1-021422	1601 E. Orangethorpe Ave, Fullerton, CA 92831	325620	417.86, 439.47	5	68	41	pH, Zinc	Published as SNC for discharge violation(s)	
McKenna Labs, Inc. (Acacia)	1-601842	1101 S. Acacia Ave, Fullerton, CA 92831	325620	417.86, 439.47	4	61	38			
MCP Foods, Inc.	1-021029	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	1	4	0			Class 1 Permit Deactivated
MCP Foods, Inc. Dba DSM-Firmenich	1-602062	424 S. Atchison St, Anaheim, CA 92805	311942	403.5(d)	3	8	0			New Class 1 Permit Issued
Medtronic Heart Valves, Inc.	1-602180	1851 E. Deere Ave, Santa Ana, CA 92705	339113	403.5(d)	1	18	5			New Class 1 Permit Issued
Medtronic plc	Z-602209	5290 California Ave, Irvine, CA 92617	541715	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Meggitt Orange County	1-601843	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	4	14	20	Lead		
Merical, LLC	1-600655	233 E. Bristol Ln, Orange, CA 92865	325412	439.47	5	34	23	Copper, Zinc	Published as SNC for discharge violation(s)	
MeriCal, LLC	1-602025	2995 E. Miraloma Ave, Anaheim, CA 92806	325411	439.47	5	54	26	O&G min.		New Class 1 Permit Issued
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	4	17	7			
Micro Precision Swiss, LLC	Z-601490	3233 W. Harvard St, Santa Ana, CA 92704	339113	433.17(a)	1	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Micrometals, Inc.	1-021153	5615 E. La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	5	27	6			
MTC Corp	1-600443	17375 Mount Herrmann St, Fountain Valley, CA 92708	336111	426.66	4	21	2			
Murrietta Circuits	1-521811	5000 E. Landon Dr, Anaheim, CA 92807	334418	433.17(a)	4	25	8			
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	5	22	4			
National Construction Rentals	1-600652	1550 E. Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	4	20	4			
Neutron Plating, Inc.	Z-321812	2993 E. Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	463.16, 463.26	4	39	12			
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	0	0	0			Class 1 Permit Deactivated
Newport Corporation	1-601837	1931 Deere Ave, Irvine, CA 92606	334516	433.17(a)	4	29	16			
Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	4	28	2			
Nikkiso ACD	Z-601703	2321 S. Pullman St, Santa Ana, CA 92705	334513	433.17(a)	1	0	0			
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	4	27	12			
Nor-Cal Beverage Company (Main)	1-021284	1226 N. Olive St, Anaheim, CA 92801	312111	403.5(d)	2	11	0			Class 1 Permit Deactivated
O'Donnell Oil, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	435.33(b)	5	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
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	5	10	1			
Omni Metal Finishing, Inc	Z-601973	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	3	0	0			
Omni Metal Finishing, Inc (Bldg.5)	Z-602132	11615 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	5	28	8			
Only Cremations & Aquamation for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	4	4	5			Formerly Listed as Only Cremation for Pets (Newport Beach)
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	4	0	0			
Orange County Chemical Supply Company, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	4	27	8			
OSI OPTO Electronics Inc. DBA Semicoa	1-601869	333 McCormick Ave, Costa Mesa, CA 92626	334413	433.17(a), 469.18(a)	2	0	0			Class 1 Permit Deactivated
Pacific Chrome Services	Z-601871	603 E. Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	1	0	0			
Pacific Coast Water Systems, Inc.	1-600520	1260 N. Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	4	21	4			Formerly Listed as Weidemann Water Conditioners, Inc. (Anaheim)
Pacific Image Technology, Inc.	1-021070	1875 S. Santa Cruz St, Anaheim, CA 92805	334412	433.17(a)	5	30	8	Copper		

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	1	0	0			
Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W. Freedom Ave, Orange, CA 92865	562219	437.47(b)	7	45	26	4-Methylphenol, Antimony, Arsenic, Titanium	Published as SNC for discharge violation(s)	
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W. Freedom Ave, Orange, CA 92865	562219	403.5(d)	4	18	5			
PCC Rollmet, Inc.	Z-601822	1822 Deere Ave, Irvine, CA 92606	33121	467.36(c), 471.35(i), 471.35(u), 471.35(v)	1	0	0			
PCX Aerosystems - Santa Ana	1-601618	2040 E. Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	5	11	20		Published as SNC for reporting violation(s)	
Performance Powder, Inc.	1-521805	2920 E. La Jolla St, Anaheim, CA 92806	332812	433.17(a)	4	26	16	Zinc		
Petroprize, Inc.	1-581180	319 20th St, Huntington Beach, CA 92648	211111	435.34(b)	6	20	3			
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	435.34(b)	7	17	4			
Pioneer Circuits, Inc.	1-011262	3010 S. Shannon St, Santa Ana, CA 92704	334412	433.17(a)	4	35	21	Lead		
Platinum Surface Coating, Inc.	1-521852	1179 N. Fountain Way, Anaheim, CA 92806	332813	433.17(a)	6	17	10			
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way, Placentia, CA 92870	211111	435.34(b)	4	15	4			
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St, Yorba Linda, CA 92886	211111	435.34(b)	5	17	4			
Porter Powder Coating, Inc.	Z-321817	510 S. Rose St, Anaheim, CA 92805	332812	433.17(a)	1	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N. Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	4	17	8			
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N. Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	4	17	8			
PowderCoat Services, LLC. Plant 5	1-600355	1747 W. Lincoln Ave, L1 Bldg, Anaheim, CA 92801	332812	433.17(a)	5	17	8			
Power Distribution, Inc.	1-511400	4011 W. Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	1	0	0	Copper	Published as SNC for discharge violation(s)	Class 1 Permit Deactivated
PowerDrive Oil & Gas Company, LLC (2nd)	1-600248	120 Second St, Huntington Beach, CA 92648	211111	435.34(b)	8	35	4			
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	4	33	28			
Precision Anodizing & Plating, Inc.	1-521809	1601 N. Miller St, Anaheim, CA 92806	332813	433.17(a)	4	36	20			
Precision Circuits West, Inc.	1-011008	3310 W. Harvard St, Santa Ana, CA 92704	334412	433.17(a)	4	30	8			
Precision Powder Coating, Inc.	Z-602165	640 S. Santa Fe St, Santa Ana, CA 92705	332812	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Precision Resource, California Division	1-111002	5803 Engineer Dr, Huntington Beach, CA 92649	332710	403.5(d)	4	20	8			
Precon, Inc.	1-021581	3131 E. La Palma Ave, Anaheim, CA 92806	332721	403.5(d)	5	27	22			
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	4	32	4	Copper, Zinc		
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	4	24	8			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Pulmuone Foods USA, Inc. (East)	1-601443	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	4	21	0			
Q-Flex Inc.	1-600337	1301 E. Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	6	25	6	Copper, Total Toxic Organics [\$433.11e]	Published as SNC for discharge violation(s)	
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N. Cypress St, Orange, CA 92867	332112	467.45	4	26	10			
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N. Cypress St, Orange, CA 92867	332112	467.46	4	27	10			
Quikturn Professional Screenprinting	1-521858	567 S. Melrose St, Placentia, CA 92870	333249	403.5(d)	5	15	4			
Ram Screen Printing, Inc.	1-601652	3369 E. Miraloma Ave, Anaheim, CA 92806	323113	403.5(d)	6	15	8			
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)	3	21	13	Cadmium, CN	Published as SNC for discharge and reporting violation(s)	
Rich Products Corporation (North)	1-601022	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	21	4			
Rich Products Corporation (South)	1-511404	3401 W. Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	21	4			
Rigiflex Technology, Inc.	1-021187	1166 N. Grove St, Anaheim, CA 92806	334418	433.17(a)	4	18	20	Copper		
Robinson Pharma, Inc. (Gummy - H6)	1-602214	3300 W. Segerstrom Ave, Santa Ana, CA 92704	325412	439.47	2	0	0			New Class 1 Permit Issued

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	2811 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	4	25	28		Published as SNC for reporting violation(s)	
Robinson Pharma, Inc. (Harbor South - H1)	1-511412	3330 S. Harbor Blvd, Santa Ana, CA 92704	325412	439.47	4	25	32			
Rolls-Royce High Temperature Composites, Inc.	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	4	12	2			
Rolls-Royce High Temperature Composites, Inc. (Fume Scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	4	12	2			
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 LotBlk, Huntington Beach, CA 92648	211111	435.33(b)	5	21	4			
RP Finishing Group Inc.	Z-601358	1226 E. Ash Ave, Fullerton, CA 92831	332812	433.17(a)	1	0	0			
RSS Manufacturing	Z-600635	1261 Logan Ave, Costa Mesa, CA 92626	NULL	433.17(a)	1	0	0			
S & C Oil Company, Inc. (2)	1-601637	18742 Goldenwest St, Huntington Beach, CA 92649	211111	435.34(b)	5	21	4			
Safety-Kleen Systems, Inc.	1-600690	2170 S. Yale St, Santa Ana, CA 92704	562211	403.5(d)	4	21	4			
Sanitor Corporation	1-601267	8400 Cerritos Ave, Stanton, CA 90680	325620	417.86, 439.47	4	35	34			
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	30	20			
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	5	38	20			
Santana Services	1-021016	1224 E. Ash Ave, Fullerton, CA 92831	332813	433.17(a)	1	0	1	Chromium		Class 1 Permit Deactivated

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Scientific Spray Finishes, Inc.	1-031311	315 S. Richman Ave, Fullerton, CA 92832	332812	433.17(a)	5	19	8			
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	5	16	5			
SFPP, LP	1-021619	1350 N. Main St, Orange, CA 92867	493190	403.5(d)	4	0	0			
Shepard Bros., Inc.	1-031034	503 S. Cypress St, La Habra, CA 90631	325611	417.166, 417.176	5	25	7			
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332721	433.17(a)	1	0	0			Class 1 Permit Deactivated
Shur-Lok Company	Z-602134	2541 White Rd, Irvine, CA 92614	332721	433.17(a)	1	0	0			New Zero Discharge Certification Issued
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	4	21	12			
Sioux Honey Association	1-602027	511 E. Katella Ave, Anaheim, CA 92805	311999	403.5(d)	4	10	3			New Class 1 Permit Issued
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	4	30	10			
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	34	20			
Solventum US LLC.	Z-371301	2111 McGaw Ave, Irvine, CA 92614	339114	433.17(a), 467.16, 471.15(m), 471.65(n), 471.65(q)	0	0	0			Formerly Listed as 3M Healthcare US Opco, LLC
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	4	15	3			Class 1 Permit Deactivated
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3500 Ste A)	1-602000	3500 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	38	16			New Class 1 Permit Issued

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3506 Ste A)	1-602001	3506 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	38	16			New Class 1 Permit Issued
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3524 Ste A)	1-602003	3524 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	38	16			New Class 1 Permit Issued
South Coast Circuits LLC DBA Summit Interconnect Santa Ana Bldg 3512 Ste A	1-602002	3512 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	4	38	16			New Class 1 Permit Issued
South Coast Circuits, Inc. (Bldg 3500 Ste A)	1-601444	3500 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	3506 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	3512 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	3524 W. Lake Center Dr, A Ste, Santa Ana, CA 92704	334412	433.17(a)	0	0	0			Class 1 Permit Deactivated
Southern California Edison #1 (MT)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	5	10	2			
Southern California Edison #2 (DAS)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	5	15	2			
Southern California Edison #3 (LARS)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	5	11	2			
Spectrum Paint And Powder, Inc.	Z-321822	1332 S. Allec St, Anaheim, CA 92805	332812	433.17(a)	1	0	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	5	24	8			
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E. Warner Ave, Santa Ana, CA 92705	332722	433.17(a), 467.16, 467.36(c), 467.46, 471.35(a), 471.35(ee), 471.35(ff), 471.35(g), 471.35(i), 471.35(j), 471.35(l), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(a), 471.65(d), 471.65(f), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	4	44	34	Cadmium, CN	Published as SNC for discharge violation(s)	
Stainless Micro-Polish, Inc.	1-021672	1286 N. Grove St, Anaheim, CA 92806	332813	433.17(a)	7	44	14	Chromium	Published as SNC for discharge violation(s)	Class 1 Permit Deactivated
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W. Collins Ave, Orange, CA 92867	332119	403.5(d)	2	4	17			Class 1 Permit Deactivated
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	5	18	8			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Statek Corporation (Main)	1-021664	512 N. Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	4	29	6			
Statek Corporation (Orange Grove)	1-521777	1449 W. Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	4	29	2			
Stepan Company	1-021674	1208 N. Patt St, Anaheim, CA 92801	325613	417.106, 417.146, 417.166	5	26	22			
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave, Santa Ana, CA 92703	311511	405.16, 405.26, 405.76	4	22	0			
Summit Interconnect, Inc.	1-600012	223 N. Crescent Way, Anaheim, CA 92801	334412	433.17(a)	6	40	20	pH		
Summit Interconnect, Inc., Orange Division	1-600060	230 W. Bristol Ln, Orange, CA 92865	334412	433.17(a)	5	44	20	Dissolved Sulfide, Sulfide		
Sunny Delight Beverages Co.	1-021045	1230 N. Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	4	19	0	pH		
Superior Connector Plating, Inc.	1-021090	1901 E. Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	5	25	71	Cadmium		
Superior Processing (2)	1-601701	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	4	29	8			
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	6401 Regio Ave, Buena Park, CA 90620	311812	403.5(d)	4	18	2	pH	Published as SNC for reporting violation(s)	
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	6491 Caballero Blvd, Buena Park, CA 90620	311991	432.126, 432.56	4	23	4	pH		
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	4	18	8			
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	2114 W. Ball Rd, Anaheim, CA 92804	333924	433.17(a)	5	39	12	Zinc		
Terra Universal, Inc.	1-601407	800 S. Raymond Ave, Fullerton, CA 92831	333999	433.17(a)	7	9	2	Zinc	Published as SNC for discharge violation(s)	

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
The Zygo Corporation, a division of Ametek, Inc	Z-602024	2031 Main St, Z Ste, Irvine, CA 92614	333314	433.17(a)	1	0	0			New Zero Discharge Certification Issued
Thermal-Vac Technology, Inc.	1-021282	1221 W. Struck Ave, Orange, CA 92867	332811	433.17(a)	4	30	20			
Thompson Energy Resources, LLC (Brea)	1-601469	3351 E. Birch St, Brea, CA 92821	211	435.34(b)	5	31	14			
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	423860	433.17(a)	4	26	10			
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20	Lead		
Toyota Racing Development, USA, Inc.	1-071059	335 E. Baker St, Costa Mesa, CA 92626	336310	403.5(d)	4	16	16			
Transline Technology, Inc.	1-021202	1106 S. Technology Cir, Anaheim, CA 92805	334412	433.17(a)	4	31	8			
Tropitone Furniture Co., Inc.	1-141163	5 Marconi, Irvine, CA 92618	337124	433.17(a)	4	29	11			
TTM Technologies North America, LLC (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	4	40	20			
TTM Technologies North America, LLC (Harbor)	1-511359	2640 S. Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	4	36	20			
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St, Anaheim, CA 92806	334412	433.17(a)	2	14	5	Copper		Class 1 Permit Deactivated
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	439.47	5	59	31			
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	7	41	7	Chromium	Published as SNC for discharge violation(s)	
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	4	21	0			

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Venus Laboratories, Inc. dba Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	4	23	6			
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St, Anaheim, CA 92806	423930	403.5(d)	5	13	0		Published as SNC for reporting violation(s)	
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325412	439.47	4	64	14			
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	1	0	0			
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	16122 Construction Cir, West , Irvine, CA 92606	562212	403.5(d)	4	25	6			
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	4	12	4			
West Newport Oil Company	1-061110	5800 W. Coast Hwy, Newport Beach, CA 92663	211111	403.5(d)	1	0	2			Class 1 Permit Deactivated
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	435.34(b)	4	28	4			
Winonics (Brea)	1-031035	660 N. Puente St, Brea, CA 92821	334412	433.17(a)	5	31	8			
Winonics LLC. dba Bench 2 Bench Technologies	1-601974	1257 S. State College Blvd, Fullerton, CA 92831	334412	433.17(a)	4	29	26	Copper		
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 POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24			
EFF-001	Silver	0.022	µg/L	0.020	µg/L	ND	µg/L	ND	µg/L	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	3.73	µg/L	3.78	µg/L	3.06	µg/L	3.38	µg/L	3.57	µg/L	4.48	µg/L	5.19	µg/L	2.14	µg/L	2.26	µg/L	2.31	µg/L	2.46	µg/L	2.63	µg/L		
	Beryllium	0.0040	µg/L	0.0030	µg/L	ND	µg/L	ND	µg/L	0.364	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Cadmium	0.0840	µg/L	0.0880	µg/L	0.105	µg/L	0.120	µg/L	0.328	µg/L	0.133	µg/L	0.130	µg/L	0.105	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cyanide	5.30	µg/L	6.20	µg/L	4.04	µg/L	4.80	µg/L	5.60	µg/L	5.00	µg/L	4.80	µg/L	ND	µg/L	ND	µg/L	2.20	µg/L	2.70	µg/L	3.20	µg/L		
	Chromium	2.33	µg/L	1.29	µg/L	0.874	µg/L	1.30	µg/L	1.93	µg/L	1.64	µg/L	1.18	µg/L	0.816	µg/L	0.792	µg/L	1.06	µg/L	0.917	µg/L	1.01	µg/L		
	Copper	3.76	µg/L	3.86	µg/L	2.80	µg/L	3.12	µg/L	4.38	µg/L	4.92	µg/L	5.91	µg/L	4.25	µg/L	4.44	µg/L	5.67	µg/L	3.03	µg/L	3.19	µg/L		
	Mercury	4.30	ng/L	3.90	ng/L	3.90	ng/L	3.40	ng/L	4.20	ng/L	2.80	ng/L	4.10	ng/L	2.80	ng/L	2.60	ng/L	3.80	ng/L	3.80	ng/L	3.90	ng/L		
	Nickel	11.7	µg/L	9.60	µg/L	6.93	µg/L	8.27	µg/L	16.8	µg/L	10.7	µg/L	8.56	µg/L	4.74	µg/L	6.17	µg/L	6.39	µg/L	5.26	µg/L	7.54	µg/L		
	1,1,1-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,1,2,2-Tetrachloroethane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,1,2-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,1-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,2-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	1,2-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,2-Dichloropropane	ND	µg/L					ND	µg/L					ND	µg/L							ND	µg/L				
	1,3-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	1,4-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	2,3,7,8-Tetrachlorodibenzo-P-Dioxin	ND	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	0.406	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-Chloroethylvinylether	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		
	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 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24										
EFF-001	Acrolein	ND	µg/L				ND	µg/L					ND	µg/L									
	Acrylonitrile	ND	µg/L				ND	µg/L					ND	µg/L									
	Aldrin	ND	µg/L										ND	µg/L									
	Alpha-BHC	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		
	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
	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
	Benzene	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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
	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
	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
	Bis (2-Ethylhexyl) Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.550	µg/L	0.610	µg/L	ND	µg/L	ND	µg/L
	Bromodichloromethane	2.34	µg/L					4.53	µg/L				1.86	µg/L						ND	µg/L		
	Bromoform	ND	µg/L					0.920	µg/L				ND	µg/L						ND	µg/L		
	Bromomethane	ND	µg/L					ND	µg/L				ND	µg/L						ND	µg/L		
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Carbon Tetrachloride	ND	µg/L					ND	µg/L				ND	µg/L						ND	µg/L		
	Chlordane	ND	µg/L																	ND	µg/L		
	Chlorobenzene	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		
	Chloroform	5.87	µg/L					11.9	µg/L				5.06	µg/L						2.72	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
	cis-1,3-Dichloropropene	ND	µg/L					ND	µg/L				ND	µg/L						ND	µg/L		
	Delta-BHC	ND	µg/L																	ND	µg/L		
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Octyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	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	0.720	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dibromochloromethane	0.980	µg/L					2.61	µg/L				0.580	µg/L						ND	µg/L		
Dieldrin	ND	µg/L																	ND	µg/L			
Diethylphthalate	0.620	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.561	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	
Endosulfan	ND	µg/L																	ND	µg/L			
Endosulfan I	ND	µg/L																	ND	µg/L			

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24																	
EFF-001	Endosulfan II	ND	µg/L										ND	µg/L																
	Endosulfan Sulfate	ND	µg/L										ND	µg/L																
	Endrin	ND	µg/L										ND	µg/L																
	Ethylbenzene	ND	µg/L				ND	µg/L			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									
	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							
	Gamma-BHC	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					
	Methylene Chloride	1.96	µg/L				ND	µg/L				ND	µg/L										ND	µg/L						
	N-Nitrosodiprophylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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					
	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					
	4,4'-DDD	ND	µg/L																					ND	µg/L					
	4,4'-DDE	ND	µg/L																						ND	µg/L				
	4,4'-DDT	0.00930	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	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	ND	µg/L	ND	µg/L	
	Phenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	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	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Tetrachloroethene	ND	µg/L					ND	µg/L					ND	µg/L												ND	µg/L		
	Toluene	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	
	trans-1,3-Dichloropropene	ND	µg/L					ND	µg/L					ND	µg/L													ND	µg/L	
	Trichloroethene	ND	µg/L					ND	µg/L					ND	µg/L													ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24			
EFF-001	Vinyl Chloride	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L						
	Lead	0.147	µg/L	0.156	µg/L	ND	µg/L	ND	µg/L	0.566	µg/L	0.157	µg/L	ND	µg/L	ND	µg/L	0.552	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Antimony	1.69	µg/L	2.35	µg/L	0.973	µg/L	1.45	µg/L	1.85	µg/L	2.11	µg/L	1.29	µg/L	0.871	µg/L	0.791	µg/L	0.832	µg/L	1.08	µg/L	1.13	µg/L		
	Selenium	13.8	µg/L	14.2	µg/L	10.4	µg/L	12.6	µg/L	14.4	µg/L	12.5	µg/L	16.1	µg/L	8.22	µg/L	6.85	µg/L	6.98	µg/L	8.13	µg/L	9.62	µg/L		
	Thallium	0.0280	µg/L	0.00300	µg/L	ND	µg/L	ND	µg/L	0.495	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Zinc	32.4	µg/L	35.4	µg/L	24.4	µg/L	31.1	µg/L	37.8	µg/L	44.5	µg/L	28.0	µg/L	26.0	µg/L	22.9	µg/L	26.1	µg/L	15.8	µg/L	24.6	µg/L		
INF-001	Silver	0.493	µg/L	0.489	µg/L	0.592	µg/L	0.468	µg/L	0.488	µg/L	0.695	µg/L	0.604	µg/L	0.519	µg/L	0.605	µg/L	0.500	µg/L	0.931	µg/L	0.514	µg/L		
	Arsenic	2.09	µg/L	1.87	µg/L	2.07	µg/L	2.29	µg/L	2.07	µg/L	2.49	µg/L	2.15	µg/L	3.21	µg/L	2.32	µg/L	2.96	µg/L	2.39	µg/L	2.37	µg/L		
	Beryllium	0.0150	µg/L	0.0110	µg/L	ND	µg/L	ND	µg/L	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	0.434	µg/L	0.373	µg/L	0.398	µg/L	0.400	µg/L	0.421	µg/L	0.520	µg/L	0.932	µg/L	0.341	µg/L	0.384	µg/L	0.487	µg/L	0.398	µg/L	0.366	µg/L		
	Cyanide	ND	µg/L	ND	µg/L	2.97	µg/L	ND	µg/L	2.40	µg/L	ND	µg/L	ND	µg/L	1.70	µg/L	ND	µg/L	ND	µg/L	3.30	µg/L	ND	µg/L		
	Chromium	4.29	µg/L	3.80	µg/L	11.5	µg/L	4.28	µg/L	4.03	µg/L	4.96	µg/L	3.58	µg/L	3.48	µg/L	4.48	µg/L	3.79	µg/L	3.14	µg/L	5.73	µg/L		
	Copper	72.5	µg/L	66.9	µg/L	79.9	µg/L	74.7	µg/L	72.7	µg/L	74.8	µg/L	76.9	µg/L	65.4	µg/L	55.2	µg/L	65.6	µg/L	58.9	µg/L	75.3	µg/L		
	Mercury	ND	ng/L	ND	ng/L	ND	ng/L	36.0	ng/L	14.0	ng/L	25.0	ng/L	32.0	ng/L	28.0	ng/L	72.0	ng/L	24.0	ng/L	27.0	ng/L	38.0	ng/L		
	Nickel	7.24	µg/L	6.44	µg/L	9.40	µg/L	7.22	µg/L	6.87	µg/L			6.49	µg/L	7.49	µg/L	5.53	µg/L	6.00	µg/L	6.54	µg/L	4.85	µg/L	6.01	µg/L
	1,1,1-Trichloroethane	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				
	1,1,2-Trichloroethane	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				
	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	ND	µg/L
	1,2-Dichloroethane	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				
	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	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	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	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	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	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	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	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	ND	µg/L
	2-Chloroethylvinylether	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	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	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	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	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	ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24			
INF-001	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	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	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	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	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	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	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		
	Aldrin	ND	µg/L																					ND	µg/L		
	Alpha-BHC	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	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	0.760	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L
	Benzene	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	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	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	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	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	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	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	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	4.25	µg/L	4.56	µg/L	5.36	µg/L	4.19	µg/L	5.97	µg/L	3.86	µg/L	5.42	µg/L	3.24	µg/L	ND	µg/L	5.02	µg/L	3.80	µg/L	5.63	µg/L		
	Bromodichloromethane	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		
	Bromomethane	ND	µg/L			ND	µg/L	ND	µg/L				ND	µg/L	ND	µg/L								ND	µg/L		
	Butyl Benzyl Phthalate	1.59	µg/L	ND	µg/L	1.06	µg/L	ND	µg/L	0.880	µg/L	ND	µg/L	0.840	µg/L	ND	µg/L	0.600	µg/L	1.86	µg/L	1.06	µg/L	0.816	µg/L		
	Carbon Tetrachloride	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		
	Chlorobenzene	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		
	Chloroform	3.01	µg/L			ND	µg/L	2.83	µg/L				1.80	µg/L	1.95	µg/L								3.66	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	ND	µg/L
	cis-1,3-Dichloropropene	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		
	Di-n-Butyl Phthalate	0.870	µg/L	0.760	µg/L	1.02	µg/L	0.730	µg/L	ND	µg/L	ND	µg/L	0.680	µg/L	0.880	µg/L	0.770	µg/L	1.04	µg/L	0.920	µg/L	0.957	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	ND	µg/L

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24			
INF-001	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		
	Dibromochloromethane	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	2.91	µg/L	2.70	µg/L	2.41	µg/L	1.87	µg/L	3.03	µg/L	3.68	µg/L	2.91	µg/L	1.31	µg/L	1.92	µg/L	2.84	µg/L	3.50	µg/L	3.56	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				
	Ethylbenzene	ND	µg/L			ND	µg/L	ND	µg/L			ND	µg/L	ND	µg/L							ND	µg/L				
	Fluroanthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	ND	µg/L
	Gamma-BHC	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	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	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	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	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	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	ND	µg/L
	Methylene Chloride	3.75	µg/L			1.78	µg/L	72.5	µg/L			1.23	µg/L	ND	µg/L							ND	µg/L				
	N-Nitrosodiprophylamine	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	34.0	ng/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	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	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				
	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	ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24		
	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	15.0	µg/L	9.29	µg/L	12.2	µg/L	14.7	µg/L	13.0	µg/L	18.3	µg/L	18.0	µg/L	8.17	µg/L	13.7	µg/L	13.4	µg/L	14.7	µg/L	18.9	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	
	Tetrachloroethene	ND	µg/L			ND	µg/L	ND	µg/L			ND	µg/L	ND	µg/L								ND	µg/L		
	Toluene	2.00	µg/L			1.10	µg/L	1.20	µg/L			0.730	µg/L	1.20	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		
	trans-1,3-Dichloropropene	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		
	Vinyl Chloride	ND	µg/L			ND	µg/L	ND	µg/L			ND	µg/L	ND	µg/L								ND	µg/L		
	Lead	2.01	µg/L	1.59	µg/L	1.47	µg/L	2.07	µg/L	1.32	µg/L	1.91	µg/L	1.18	µg/L	1.99	µg/L	1.14	µg/L	2.61	µg/L	1.85	µg/L	2.61	µg/L	
	Antimony	1.04	µg/L	1.19	µg/L	0.838	µg/L	0.893	µg/L	0.850	µg/L	1.16	µg/L	1.05	µg/L	0.988	µg/L	0.752	µg/L	0.857	µg/L	1.35	µg/L	0.992	µg/L	
	Selenium	3.05	µg/L	3.22	µg/L	2.34	µg/L	3.41	µg/L	2.25	µg/L	3.14	µg/L	3.06	µg/L	4.16	µg/L	3.00	µg/L	4.46	µg/L	3.35	µg/L	2.73	µg/L	
	Thallium	0.00900	µg/L	0.00700	µg/L	ND	µg/L	ND	µg/L	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	148	µg/L	148	µg/L	141	µg/L	153	µg/L	143	µg/L	156	µg/L	136	µg/L	124	µg/L	115	µg/L	128	µg/L	139	µg/L	142	µg/L	
INF-002	Silver	0.271	µg/L	0.447	µg/L	0.787	µg/L	0.416	µg/L	0.249	µg/L	0.271	µg/L	0.300	µg/L	0.436	µg/L	0.430	µg/L	0.383	µg/L	0.996	µg/L	0.946	µg/L	
	Arsenic	2.21	µg/L	2.40	µg/L	4.24	µg/L	3.97	µg/L	3.11	µg/L	3.29	µg/L	3.12	µg/L	5.10	µg/L	3.95	µg/L	3.94	µg/L	3.50	µg/L	3.46	µg/L	
	Beryllium	0.00800	µg/L	0.0100	µg/L	ND	µg/L	ND	µg/L	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	0.448	µg/L	0.590	µg/L	0.258	µg/L	0.564	µg/L	0.417	µg/L	0.361	µg/L	0.304	µg/L	0.645	µg/L	0.453	µg/L	0.319	µg/L	0.412	µg/L	0.364	µg/L	
	Cyanide	ND	µg/L	ND	µg/L	2.73	µg/L	ND	µg/L	2.30	µg/L	ND	µg/L	2.20	µg/L	ND	µg/L	2.10	µg/L	ND	µg/L	1.60	µg/L	1.60	µg/L	
	Chromium	3.85	µg/L	3.01	µg/L	6.35	µg/L	5.19	µg/L	5.42	µg/L	4.64	µg/L	4.20	µg/L	11.0	µg/L	5.91	µg/L	5.64	µg/L	5.32	µg/L	6.26	µg/L	
	Copper	33.7	µg/L	47.9	µg/L	39.7	µg/L	71.6	µg/L	44.6	µg/L	46.0	µg/L	47.6	µg/L	69.0	µg/L	42.6	µg/L	39.0	µg/L	50.9	µg/L	51.0	µg/L	
	Mercury	ND	ng/L	ND	ng/L	10.0	ng/L	4.70	ng/L	22.0	ng/L	16.0	ng/L	15.0	ng/L	32.0	ng/L	58.0	ng/L	19.0	ng/L	20.0	ng/L	43.0	ng/L	
	Nickel	5.34	µg/L	5.62	µg/L	5.25	µg/L	7.39	µg/L	4.92	µg/L	4.98	µg/L	4.78	µg/L	7.71	µg/L	6.03	µg/L	5.63	µg/L	5.99	µg/L	6.17	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	1.02	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24				
			µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L		µg/L	
INF-002	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	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	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	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	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	ND	µg/L	
	2-Nitrophenol	ND	µg/L	ND	µg/L	1.21	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	1.94	µg/L	1.34	µg/L	ND	µg/L	1.17	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	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	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	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	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	ND	µg/L	
	4-Nitrophenol	ND	µg/L	ND	µg/L	1.98	µg/L	ND	µg/L	ND	µg/L	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	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	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	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	ND	µg/L	
	Aldrin	ND	µg/L																							ND	µg/L	
	Alpha-BHC	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	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	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	ND	µg/L	
	Benzene	ND	µg/L	0.910	µg/L	0.542	µg/L	1.02	µg/L	0.557	µg/L	1.16	µg/L	1.28	µg/L	0.658	µg/L	0.525	µg/L	1.10	µg/L	0.305	µg/L	0.383	µg/L	ND	µg/L	
	Benzidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	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	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	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	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	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	ND	µg/L	
	Bis (2-Ethylhexyl) Phthalate	3.78	µg/L	2.49	µg/L	2.49	µg/L	2.08	µg/L	3.44	µg/L	3.07	µg/L	3.58	µg/L	3.06	µg/L	ND	µg/L	3.47	µg/L	3.93	µg/L	3.46	µg/L	ND	µg/L	
	Bromodichloromethane	ND	µg/L	ND	µg/L	0.390	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.198	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	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	ND	µg/L		
Butyl Benzyl Phthalate	2.06	µg/L	ND	µg/L	0.900	µg/L	ND	µg/L	0.620	µg/L	ND	µg/L	0.770	µg/L	ND	µg/L	0.520	µg/L	ND	µg/L	0.800	µg/L	0.589	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	ND	µg/L		
Chlordane	ND	µg/L																								ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24		
INF-002	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	1.90	µg/L	ND	µg/L	8.30	µg/L	2.82	µg/L	2.28	µg/L	2.21	µg/L	2.73	µg/L	12.8	µg/L	5.16	µg/L	4.44	µg/L	2.36	µg/L	1.92	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	
	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		
	Di-n-Butyl Phthalate	0.880	µg/L	0.670	µg/L	0.720	µg/L	0.530	µg/L	ND	µg/L	ND	µg/L	0.530	µg/L	0.750	µg/L	ND	µg/L	0.800	µg/L	0.780	µg/L	0.659	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	
	Dibromochloromethane	ND	µg/L	ND	µg/L	0.240	µg/L	0.108	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.165	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
	Dieldrin	ND	µg/L																				ND	µg/L		
	Diethylphthalate	2.51	µg/L	1.74	µg/L	1.85	µg/L	0.890	µg/L	1.90	µg/L	1.35	µg/L	1.67	µg/L	0.910	µg/L	1.96	µg/L	3.99	µg/L	2.26	µg/L	2.20	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		
	Ethylbenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.126	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.645	µg/L	
	Fluroanthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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	
	Gamma-BHC	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	
	Methylene Chloride	ND	µg/L	1.80	µg/L	1.74	µg/L	0.358	µg/L	0.500	µg/L	ND	µg/L	ND	µg/L	0.283	µg/L	ND	µg/L	ND	µg/L	2.28	µg/L	0.988	µg/L	
	N-Nitrosodiprophylamine	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	
	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	µg/L	33.0	ng/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	
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		
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			

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24		
INF-002	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
	Phenanthrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Phenol	13.5	µg/L	0.690	µg/L	ND	µg/L	12.0	µg/L	10.9	µg/L	15.5	µg/L	16.0	µg/L
	Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Tetrachloroethene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Toluene	1.92	µg/L	2.57	µg/L	1.99	µg/L	1.72	µg/L	1.45	µg/L	2.77	µg/L	2.64	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
	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
	Trichloroethene	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
	Lead	1.12	µg/L	1.21	µg/L	1.56	µg/L	2.16	µg/L	0.942	µg/L	1.18	µg/L	0.947	µg/L
	Antimony	0.448	µg/L	0.550	µg/L	0.719	µg/L	0.742	µg/L	0.538	µg/L	0.630	µg/L	0.740	µg/L
	Selenium	14.4	µg/L	16.4	µg/L	12.0	µg/L	20.7	µg/L	16.3	µg/L	14.0	µg/L	14.3	µg/L
Thallium	0.00900	µg/L	0.00900	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Zinc	116	µg/L	118	µg/L	101	µg/L	164	µg/L	103	µg/L	119	µg/L	116	µg/L	
INF-002A	Silver	0.688	µg/L	0.423	µg/L	0.775	µg/L	0.481	µg/L	0.265	µg/L	2.27	µg/L	0.566	µg/L
	Arsenic	6.03	µg/L	5.55	µg/L	4.30	µg/L	11.2	µg/L	6.15	µg/L	6.99	µg/L	7.01	µg/L
	Beryllium	0.0290	µg/L	0.122	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cadmium	0.460	µg/L	0.326	µg/L	0.263	µg/L	0.394	µg/L	0.373	µg/L	0.581	µg/L	0.516	µg/L
	Cyanide	4.80	µg/L	2.20	µg/L	2.91	µg/L	4.30	µg/L	2.90	µg/L	2.70	µg/L	3.80	µg/L
	Chromium	12.1	µg/L	8.86	µg/L	6.17	µg/L	16.0	µg/L	10.1	µg/L	9.13	µg/L	9.08	µg/L
	Copper	64.9	µg/L	45.1	µg/L	42.2	µg/L	61.7	µg/L	40.1	µg/L	40.6	µg/L	52.9	µg/L
	Mercury	4.80	ng/L	23.0	ng/L	11.0	ng/L	34.0	ng/L	14.0	ng/L	22.0	ng/L	40.0	ng/L
	Nickel	9.40	µg/L	19.1	µg/L	5.60	µg/L	10.6	µg/L	10.3	µg/L	7.92	µg/L	24.0	µg/L
	1,1,1-Trichloroethane	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
	1,1,2-Trichloroethane	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
	1,2-Dichlorobenzene	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

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24	
INF-002A	1,2-Dichloropropane	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-Chloroethylvinylether	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	1.34	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	2.12	µg/L	1.54	µg/L	ND	µg/L	2.42	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	2.70	µg/L	1.97	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	3.70	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
	Acrolein	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		
	Aldrin	ND	µg/L																			ND	µg/L		
	Alpha-BHC	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
	Benzene	ND	µg/L					ND	µg/L	ND	µg/L	ND	µg/L	0.130	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	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
	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

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23		Aug 23		Sep 23		Oct 23		Nov 23		Dec 23		Jan 24		Feb 24		Mar 24		Apr 24		May 24		Jun 24			
INF-002A	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	1.96	µg/L	4.63	µg/L	2.49	µg/L	0.940	µg/L	2.36	µg/L	1.61	µg/L	2.43	µg/L	2.35	µg/L	5.12	µg/L	ND	µg/L	3.27	µg/L	2.84	µg/L		
	Bromodichloromethane	ND	µg/L					0.508	µg/L	0.670	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				
	Bromomethane	ND	µg/L					ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L					ND	µg/L	ND	µg/L				
	Butyl Benzyl Phthalate	1.06	µg/L	ND	µg/L	0.930	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.730	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				
	Chlordane	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				
	Chloroethane	ND	µg/L					ND	µg/L	ND	µg/L	ND	µg/L	0.142	µg/L					ND	µg/L	ND	µg/L				
	Chloroform	2.66	µg/L					28.4	µg/L	50.9	µg/L	101	µg/L	4.12	µg/L					10.9	µg/L	2.18	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		
	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				
	Delta-BHC	ND	µg/L																			ND	µg/L				
	Di-n-Butyl Phthalate	0.730	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.720	µg/L	0.620	µg/L	0.710	µg/L	0.730	µg/L	0.591	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	2.74	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		
	Dibromochloromethane	ND	µg/L					0.128	µg/L	0.237	µg/L	ND	µg/L	ND	µg/L					ND	µg/L	ND	µg/L				
	Dieldrin	ND	µg/L																			ND	µg/L				
	Diethylphthalate	1.58	µg/L	2.46	µg/L	4.00	µg/L	1.84	µg/L	1.66	µg/L	1.18	µg/L	1.50	µg/L	1.12	µg/L	1.82	µg/L	3.85	µg/L	2.40	µg/L	2.01	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				
	Ethylbenzene	ND	µg/L					ND	µg/L	ND	µg/L	0.126	µg/L	ND	µg/L					ND	µg/L	ND	µg/L				
	Fluroanthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	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		
	Gamma-BHC	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			

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Monitoring Location	Name	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24													
INF-002A	Methylene Chloride	ND	µg/L				1.31	µg/L	1.15	µg/L	0.682	µg/L	ND	µg/L			ND	µg/L	ND	µg/L						
	N-Nitrosodiprophylamine	ND	µg/L	ND	µg/L	ND	µg/L	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			
	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			
	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			
	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		
	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	ND	µg/L	ND	µg/L	0.360	µg/L	0.440	µg/L	29.1	µg/L	36.7	µg/L	22.8	µg/L	2.20	µg/L	5.28	µg/L	8.84	µg/L	2.69	µg/L	5.68	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	
	Tetrachloroethene	ND	µg/L					ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L							ND	µg/L	ND	µg/L	
	Toluene	1.98	µg/L					0.762	µg/L	0.547	µg/L	ND	µg/L	0.328	µg/L							ND	µg/L	2.09	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	
	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	
	Trichloroethene	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	
	Lead	2.35	µg/L	1.96	µg/L	1.53	µg/L	4.95	µg/L	1.86	µg/L	2.50	µg/L	2.15	µg/L	2.93	µg/L	3.01	µg/L	1.30	µg/L	1.35	µg/L	2.34	µg/L	
	Antimony	1.31	µg/L	2.43	µg/L	0.734	µg/L	2.69	µg/L	1.43	µg/L	1.49	µg/L	1.36	µg/L	1.13	µg/L	1.00	µg/L	0.829	µg/L	0.832	µg/L	1.21	µg/L	
	Selenium	7.50	µg/L	7.68	µg/L	11.7	µg/L	9.51	µg/L	7.77	µg/L	7.03	µg/L	7.75	µg/L	8.85	µg/L	9.67	µg/L	7.79	µg/L	8.59	µg/L	9.33	µg/L	
Thallium	0.0110	µg/L	0.118	µg/L	ND	µg/L	ND	µg/L	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	148	µg/L	99.9	µg/L	97.9	µg/L	181	µg/L	146	µg/L	113	µg/L	132	µg/L	144	µg/L	119	µg/L	103	µg/L	121	µg/L	135	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**

Elements

Antimony
Arsenic
Beryllium
Cadmium
Chromium
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Zinc

Other Constituents

Asbestos
Cyanide

**Pesticides and PCBs
(EPA Method 608)**

Aldrin
Alpha-BHC
Beta-BHC
Delta-BHC
Gamma-BHC
Chlordane
4,4'-DDD
4,4'-DDE
4,4'-DDT
Dieldrin
Endosulfan I
Endosulfan II
Endosulfan Sulfate
Endrin
Endrin Aldehyde
Heptachlor
Heptachlor Epoxide
PCB-1016
PCB-1221
PCB-1232
PCB-1242
PCB-1248
PCB-1254
PCB-1260
Toxaphene

**Purgeable Organic Compounds
(EPA Method 624)**

Acrolein
Acrylonitrile
Benzene
Bromomethane
Bromodichloromethane
Bromoform
Carbon Tetrachloride
Chlorobenzene
2-Chlorovinylether
Chloroform
Chloromethane
Dibromochloromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethene
Trans-1,2-Dichloroethene
1,2-Dichloropropane
Cis-1,3-Dichloropropene
Trans-1,3-Dichloropropene
Ethylbenzene
Methylene Chloride
1,1,2,2-Tetrachloroethane
Tetrachloroethene
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethene
Toluene
Vinyl Chloride

**Base/Neutral Extractable Organic
Compounds
(EPA Method 625)**

Acenaphthene
Acenaphthylene
Benzidene
Benzo (a) Anthracene
Benzo (b) Fluoranthene
Benzo (k) Fluoranthene
Benzo (a) Pyrene
Benzo (g,h,i) Perylene
Bis (2-Chloroethyl) Ether
Bis (2-Chloroethoxy) Methane
Bis (2-Ethylhexyl) Phthalate
Bis (dichloroisopropyl) Ether
4-Bromophenyl-Phenyl Ether
Butyl Benzyl Phthalate

**Base/Neutral Extractable Organic
Compounds (Continued)**

2-Chloronaphthalene
4-Chlorophenyl-phenyl Ether
Chrysene
Dibenzo (a,h) Anthracene
Di-N-Butyl Phthalate
1,3-Dichlorobenzene
1,4-Dichlorobenzene
1,2-Dichlorobenzene
3,3-Dichlorobenzidine
Diethylphthalate
Dimethylphthalate
2,4-Dinitrotoluene
2,6-Dinitrotoluene
Di-N-Octyl Phthalate
1,2-Diphenylhydrazine
Fluoranthene
Fluorene
Hexachlorobenzene
Hexachlorobutadiene
Hexachloroethane
Hexachlorocyclopentadiene
Indeno (1,2,3-cd) Pyrene
Isophorone
Naphthalene
Nitrobenzene
N-Nitrosodimethylamine
N-Nitrosodipropylamine
N-Nitrosodiphenylamine
Phenanthrene
Pyrene
2,3,7,8-Tetrachlorodibenzo-P-Dioxin
1,2,4-Trichlorobenzene

**Acid Extractable Organic
Compounds
(EPA Method 625)**

4-Chloro-3-Methylphenol
2-Chlorophenol
2,4-Dichlorophenol
2,4-Dimethylphenol
2,4-Dinitrophenol
2-Methyl-4,6-Dinitrophenol
2-Nitrophenol
4-Nitrophenol
Pentachlorophenol
Phenol
2,4,6-Trichlorophenol

Appendix D. Fees/Penalties for Noncompliance

APPENDIX D
FEEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Issue Date	Amount	Item	Enforcement ID
Advance-Tech Plating, Inc.	8/7/2023	525	Notice of Violation	2023-00058669
Advance-Tech Plating, Inc.	2/12/2024	527	Notice of Violation	2024-00061914
Air Industries Company, A PCC Company (Knott)	10/18/2023	200	Notice of Violation	2023-00059912
Air Industries Company, A PCC Company (Knott)	1/17/2024	400	Notice of Violation	2024-00061390
Air Industries Company, A PCC Company (Knott)	1/29/2024	727	Notice of Violation	2024-00061727
Air Industries Company, A PCC Company (Knott)	3/11/2024	400	Notice of Violation	2024-00062236
Air Industries Company, A PCC Company (Knott)	5/28/2024	727	Notice of Violation	2024-00063397
Allied Electronics Services, Inc.	2/12/2024	513	Notice of Violation	2024-00061915
Allied International	8/7/2023	400	Notice of Violation	2023-00058684
Alloy Die Casting, Co. dba ADC Aerospace	12/27/2023	400	Notice of Violation	2023-00061009
AlSCO, Inc. dba AlSCO Uniforms	10/11/2023	400	Notice of Violation	2023-00059751
AlSCO, Inc. dba AlSCO Uniforms	1/3/2024	200	Notice of Violation	2024-00061092
Aluminum Forge - Div. of Alum. Precision	7/21/2023	400	Notice of Violation	2023-00058078
Aluminum Precision Products, Inc. (Susan)	1/31/2024	400	Notice of Violation	2024-00061768
Aluminum Precision Products, Inc. (Susan)	2/12/2024	727	Notice of Violation	2024-00061916
Aluminum Precision Products, Inc. (Susan)	4/10/2024	400	Notice of Violation	2024-00062679
Amerimax Building Products	7/18/2023	725	Notice of Violation	2023-00057902
AnoChem Coatings	5/28/2024	779	Notice of Violation	2024-00063395
APCT Orange County	12/27/2023	200	Notice of Violation	2023-00061000
Arrowhead Products Corporation	12/14/2023	713	Notice of Violation	2023-00060780
Avid Bioservices, Inc.	8/2/2023	400	Notice of Violation	2023-00058321
BAZZ HOUSTON CO .	11/20/2023	400	Notice of Violation	2023-00060387
Bristol Industries	1/26/2024	727	Notice of Violation	2024-00061306
Bristol Industries	6/25/2024	527	Notice of Violation	2024-00063955
Cali Chem Inc. dba Be Beauty	10/30/2023	400	Notice of Violation	2023-00060128
Cali Chem Inc. dba Be Beauty	2/9/2024	770	Notice of Violation	2024-00061928
CJ Foods Manufacturing LLC	3/11/2024	513	Notice of Violation	2024-00062456
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	6/25/2024	713	Notice of Violation	2024-00063956
CP-Carrillo, Inc. (McGaw)	6/5/2024	770	Notice of Violation	2024-00063683

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Issue Date	Amount	Item	Enforcement ID
Dr. Smoothie Enterprises - DBA Bevolution Group	10/4/2023	713	Notice of Violation	2023-00059754
Dr. Squatch Bricc City	6/5/2024	770	Notice of Violation	2024-00063684
Electrode Technologies, Inc. dba Reid Metal Finishing	7/24/2023	400	Notice of Violation	2023-00058303
Electrode Technologies, Inc. dba Reid Metal Finishing	7/24/2023	400	Notice of Violation	2023-00058307
Embee Processing (Anodize)	1/26/2024	774	Notice of Violation	2024-00061386
Excello Circuits, Inc. (Hunter)	3/11/2024	758	Notice of Violation	2024-00062264
Excello Circuits, Inc. (Hunter)	6/5/2024	400	Notice of Violation	2024-00063685
Gold Coast Baking Company, Inc.	8/29/2023	707	Notice of Violation	2023-00059196
Gold Coast Baking Company, Inc.	9/18/2023	200	Notice of Violation	2023-00058695
Gold Coast Baking Company, Inc.	10/4/2023	400	Notice of Violation	2023-00059738
Gold Coast Baking Company, Inc.	10/25/2023	713	Notice of Violation	2023-00060101
Gold Coast Baking Company, Inc.	11/20/2023	200	Notice of Violation	2023-00060408
Gold Coast Baking Company, Inc.	2/12/2024	513	Notice of Violation	2024-00061929
Gold Coast Baking Company, Inc.	2/28/2024	200	Notice of Violation	2024-00062223
Gold Coast Baking Company, Inc.	4/10/2024	513	Notice of Violation	2024-00062826
Goodwin Company	2/2/2024	400	Notice of Violation	2024-00061815
Goodwin Company	6/5/2024	400	Notice of Violation	2024-00063686
Graphic Packaging International, Inc.	12/14/2023	713	Notice of Violation	2023-00060781
Graphic Packaging International, Inc.	6/18/2024	713	Notice of Violation	2024-00063806
Harbor Truck Bodies, Inc.	7/25/2023	725	Notice of Violation	2023-00058317
Harbor Truck Bodies, Inc.	9/11/2023	200	Notice of Violation	2023-00059445
Harbor Truck Bodies, Inc.	9/12/2023	400	Notice of Violation	2023-00059205
Hightower Plating & Manufacturing Co.	8/1/2023	675	Notice of Violation	2023-00057529
J&J Marine Acquisition Co., LLC	10/20/2023	579	Notice of Violation	2023-00059914
Kinsbursky Brothers Supply, Inc.	4/10/2024	527	Notice of Violation	2024-00062545
La Habra Bakery	11/9/2023	513	Notice of Violation	2023-00060317
Linco Industries, Inc.	8/16/2023	400	Notice of Violation	2023-00058855
Linco Industries, Inc.	9/19/2023	826	Notice of Violation	2023-00059197
Linco Industries, Inc.	10/20/2023	774	Notice of Violation	2023-00059915
Linco Industries, Inc.	11/21/2023	400	Notice of Violation	2023-00060412
Linco Industries, Inc.	2/28/2024	400	Notice of Violation	2024-00062231
McKenna Labs, Inc.	10/4/2023	400	Notice of Violation	2023-00059753
McKenna Labs, Inc.	2/28/2024	713	Notice of Violation	2024-00062224
Meggitt Orange County	3/20/2024	400	Notice of Violation	2024-00062543
Merical, LLC	3/19/2024	779	Notice of Violation	2024-00062531

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility	Issue Date	Amount	Item	Enforcement ID
MeriCal, LLC	5/6/2024	770	Notice of Violation	2024-00063128
Micrometals, Inc.	7/18/2023	725	Notice of Violation	2023-00057964
Pacific Image Technology, Inc.	8/7/2023	725	Notice of Violation	2023-00058671
Patriot Wastewater, LLC (Freedom CWT)	12/21/2023	1462	Notice of Violation	2023-00060782
Patriot Wastewater, LLC (Freedom CWT)	12/21/2023	400	Notice of Violation	2023-00060859
Patriot Wastewater, LLC (Freedom CWT)	1/31/2024	400	Notice of Violation	2024-00061769

Appendix E. Public Notice of Industries in Significant
Noncompliance

The Orange County Register

1920 Main St., Suite 225
Irvine, Ca 92614
714-796-7000

5190301

OC SANITATION DIST DIRECT
10844 ELLIS AVE
FOUNTAIN VALLEY, CA 92708-7018

FILE NO. OC San SNC Publication 2024

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA, }
County of Orange } SS.

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 newspaper 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:

10/26/2024

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 Anaheim, Orange County, California, on
Date: October 26, 2024.

Signature

PROOF OF PUBLICATION

Legal No. 0011697380

PUBLIC NOTICE

In accordance with the public participation requirements of Title 40, Part 25 (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, 2023 through June 30, 2024, were identified as industries in significant noncompliance with applicable Pretreatment requirements. An industry in significant noncompliance is defined as follows:

- Chronic violations of wastewater discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(i).
- Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(i) multiplied by the applicable TRC (TRC = 1.4 for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), fats, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(i) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW ("Publicly Owned Treatment Works" which in this case is OC San) determines has caused, alone or in combination with other discharges, interference or Pass 1 through (including endangering the health of POTW personnel or the general public).
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

OC San has taken enforcement action against these permittees. In response, permittees are required to identify and implement corrective actions to maintain long-term compliance with wastewater discharge regulations and permit limits.

Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2023/24 Orange County Sanitation District			
Company Name	Permit No.	Category	City
Industries SNC Due to Discharge Violations			
Air Industries Company, A PCC Company (Knot)	1-531404	Metal Finishing, Nonferrous Metals Forming and Metal Powders	Garden Grove
Allied International	1-031107	Soap and Detergent Manufacturing	Buena Park
Aluminum Precision Products, Inc. (Susan)	1-011100	Aluminum Forming	Santa Ana
BAZZ HOUSTON CO.	1-031010	OC San Local Limits	Garden Grove
Cali Chem Inc. dba Be Beauty	1-601976	Soap and Detergent Manufacturing	Garden Grove
CP-Carrillo, Inc. (McGaw)	1-571316	OC San Local Limits	Irvine
Dr. Squatch Bric City	1-602045	Soap and Detergent Manufacturing	Brea
Embee Processing (Anodize)	1-600456	Electroplating, Metal Finishing	Santa Ana
Harbor Truck Bodies, Inc.	1-021286	Metal Finishing	Brea
McKenna Labs, Inc.	1-021422	Pharmaceutical Manufacturing, Soap and Detergent Manufacturing	Fullerton
Mercial, LLC	1-600655	Pharmaceutical Manufacturing	Orange
Patriot Wastewater, LLC (Freedom CWT)	1-521861	Centralized Waste Treatment	Orange
Power Distribution, Inc.	1-511400	OC San Local Limits	Santa Ana
Q-Flex Inc.	1-600337	Metal Finishing	Santa Ana
SPS Technologies I.L.C. DBA Cherry Aerospace	1-511381	Aluminum Forming, Metal Finishing, Nonferrous Metals Forming and Metal Powders	Santa Ana
Stainless Micro-Polish, Inc. (Previous Ownership)	1-021672	Metal Finishing	Anaheim
Terra Universal, Inc.	1-601407	Metal Finishing	Fullerton
Universal Molding Co.	1-521836	Metal Finishing	Fullerton
Industries SNC Due to Reporting Violations			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Aviation Equipment Processing	1-071037	Metal Finishing	Costa Mesa
Beo-Mag Plating	1-511370	Metal Finishing	Santa Ana
Bioduro LLC (Fairbanks)	1-601616	Pharmaceutical Manufacturing	Irvine
Bioduro LLC (Jeronimo)	1-601617	Pharmaceutical Manufacturing	Irvine
Brasstech, Inc	1-600316	Metal Finishing	Santa Ana
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
DS Services of America	1-021393	OC San Local Limits	Santa Ana
Electron Plating III, Inc.	1-021336	Metal Finishing	Garden Grove
Emerald SoCal, LLC / Emerald Orange	1-601615	OC San Local Limits	Orange
International Paper Company (Buena Park Bag)	1-531419	OC San Local Limits	Buena Park
Joint Forces Training Base, Los Alamitos	1-031270	OC San Local Limits	Los Alamitos
Koia Anaheim Facility, LLC	1-601767	OC San Local Limits	Anaheim
PCX Aerosystems - Santa Ana	1-601618	Metal Finishing	Santa Ana
Robinson Pharma, Inc. (Harbor North - H2)	1-600126	Pharmaceutical Manufacturing	Santa Ana
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	OC San Local Limits	Buena Park
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim
Industries SNC Due to Discharge and Reporting Violations			
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
RBC Transport Dynamics Corp.	1-011013	Metal Finishing	Santa Ana

The Orange County Register
Published: 10/26/24

Appendix F. Acknowledgements

APPENDIX F

ACKNOWLEDGEMENTS

The Resource Protection Division of the Orange County Sanitation District wishes to acknowledge the following people for their contributions to this report:

OC San Resource Protection Division

- Mark Kawamoto Reviewer/Writer/Signatory, Environmental Protection Manager
- Jason Daniel Reviewer/Writer, Engineering Supervisor
- Jonathon Powell..... Reviewer/Writer, Environmental Supervisor
- Mike Zedek..... Reviewer/Writer, Engineering Supervisor
- Melissa Soriano..... Report Coordinator/Writer, Sr. Environmental Specialist
- Bryce Dragan Writer, Pr. Environmental Specialist
- Lazaro Eleuterio Writer, Engineer
- Brian Finkelstein..... Writer, Engineer
- Paul Gabot Writer, Associate Engineer
- Kiran Kaur Writer, Sr. Engineer
- Lori McKinley..... Writer, Pr. Environmental Specialist
- Mi Nguyen Writer, Engineer
- Kevin Nugent..... Writer, Associate Engineer
- Adrian Siew Writer, Associate Engineer
- Stephanie Shamblin Gray Writer, Engineer
- Brian Swenson Writer, Engineer

OC San Public Affairs, Laboratory, Monitoring and Compliance, Operations, and Financial Management Staff

- Dindo Carrillo Writer, Regulatory Specialist
- Pragathi Chandupatla Writer, Sr. Information Tech Analyst
- Gregg Deterding..... Cover Design, Graphics Designer
- Robert Gamber Writer, Sr. Environmental Specialist
- Matthew Garchow Analytical Data/Appendices, Pr. Information Tech Analyst
- Jackie Lerma..... Writer, Associate Engineer
- Peter Park Writer, Associate Engineer
- Shallee Milligan Riley Writer, Accounting Supervisor
- Matthew Smith Writer, Sr. Regulatory Specialist
- Reza Sobhani..... Writer, Engineer
- Cristina Stanford Writer, Pr. Accountant
- Danny Tang..... Environmental Supervisor
- Cindy Vellucci..... Writer, Sr. Environmental Specialist



External Contributors

Michael Barber Data Preparation, Senior Pretreatment & Source Control Inspector, IEUA
Benjamin Burgett..... Data Preparation, Source Control Program Manager, Western Water
Jim Colston..... Writer/Reviewer, Director of Water Quality & Regulatory Compliance, IRWD
Elizabeth Duarte..... Writer/Data Preparation, Executive Secretary, IRWD
Gary EthridgeData Preparation, Pretreatment Program Coordinator, SBVMWD
Scott Giatpaiboon Data Preparation, Water Quality Manager, IRWD
Lucas GilbertWriter/Reviewer, Manager of Permitting and Pretreatment, SAWPA
John JacksonData Preparation, Senior Environmental Analyst, EMWD
Isabel Melendez Writer/Reviewer, Regulatory Compliance Scientist, IRWD
Jeffrey Mosher General Manager, SAWPA
Huan Nguyen Data Preparation, Student Intern, IRWD
David Ruhl.....Reviewer, Executive Manager of Engineering and Operations, SAWPA
Sonya San Juan.....iPACS and Agency Coordination/Data Preparation, Business Analyst, SAWPA
Ken Tam..... Data Preparation, Manager of Environmental Services, SAWPA
Alfredo Vasquez..... Writer/Data Preparation, Senior Pretreatment Program Specialist, SAWPA

Appendix G. Irvine Ranch Water District (IRWD) Sampling

APPENDIX G

2023/24 Irvine Ranch Water District (IRWD) Quarterly Priority Pollutant Monitoring

Sampling is performed quarterly by Regulatory Compliance personnel on the influent and effluent. The results for MWRP influent and effluent 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.

Samples are submitted to the IRWD Water Quality Laboratory where they are analyzed in-house or contracted to either Weck Laboratories located in the City of Industry, or Eurofins Test America Laboratory located in the City of Irvine. Collected samples are preserved, refrigerated, and shipped on ice as required to the specific lab for analysis. Each lab supplies their respective sample containers with the preservatives as required by the method.

The reporting detection limits shown in the results are the limits for that particular sample. The reporting detection limit may vary from the laboratory and from sample to sample based on QA/QC analysis and the degree of sample dilution.

APPENDIX G
SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, EFFLUENT AND SLUDGE, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
INFLUENT							
Antimony	0.47	0.53	0.67	N/A	0.40	0.596	0.50
Arsenic	2.36	2.80	2.94	1.96	2.52	2.72	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	ND	ND	ND	ND	ND	0.071	0.25
Chromium	1.26	1.72	1.05	1.31	1.34	2.67	0.50
Copper	73.7	53.9	37.2	46.7	52.9	84.3	0.50
Lead	0.83	0.80	0.62	0.60	0.71	1.06	0.50
Mercury	ND	ND	0.013	ND	ND	0.017	0.01
Nickel	2.64	2.85	2.21	3.04	2.69	3.84	0.50
Selenium	1.77	2.04	1.7	2.7	2.05	2.12	0.50
Silver	0.25	0.65	0.25	0.31	0.36	0.46	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	50.0	25.0	59.0	22.0	39.0	47.4	5.00
Zinc	120	170	143	133	142	163	0.50
EFFLUENT							
Antimony	ND	ND	0.67	ND	0.17	0.596	0.50
Arsenic	2.01	2.19	2.08	1.96	2.06	1.99	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	ND	ND	ND	ND	ND	ND	0.25
Chromium	ND	ND	0.53	ND	0.13	0.304	0.50
Copper	4.91	3.40	11.2	4.28	5.94	3.86	0.50
Lead	ND	ND	ND	ND	ND	ND	0.50
Mercury	ND	ND	ND	ND	ND	ND	0.01
Nickel	1.52	1.88	1.64	1.53	1.64	1.96	0.50
Selenium	1.26	1.15	1.2	1.55	1.29	1.28	0.50
Silver	ND	ND	ND	ND	ND	ND	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	ND	ND	ND	ND	ND	0.878	0.50
Zinc	39.4	39.3	74.2	37.8	47.7	42.0	0.50
SLUDGE							
Antimony	NA	NA	NA	NA	NA	NA	10.00
Arsenic	NA	NA	NA	NA	NA	NA	20.00
Beryllium	NA	NA	NA	NA	NA	NA	10.00
Cadmium	NA	NA	NA	NA	NA	NA	5.00
Chromium	NA	NA	NA	NA	NA	NA	10.00
Copper	NA	NA	NA	NA	NA	NA	10.00
Lead	NA	NA	NA	NA	NA	NA	10.00

APPENDIX G
SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, EFFLUENT AND SLUDGE, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
Mercury	NA	NA	NA	NA	NA	NA	0.01
Nickel	NA	NA	NA	NA	NA	NA	10.00
Selenium	NA	NA	NA	NA	NA	NA	10.00
Silver	NA	NA	NA	NA	NA	NA	5.00
Thallium	NA	NA	NA	NA	NA	NA	20.00
Total Cyanide	NA	NA	NA	NA	NA	NA	100.00
Zinc	NA	NA	NA	NA	NA	NA	10.00

ML method quantitation limit, results below the ML are reported as ND
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	ND	0.58	ND	0.55	0.28	ND	0.50
Bromoform	ND	ND	ND	ND	ND	ND	0.50
Bromomethane	ND	ND	ND	ND	ND	ND	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	1.65	1.33	1.27	1.36	1.40	1.13	0.50
Chloromethane	ND	ND	ND	ND	ND	ND	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	0.51	0.62	ND	0.67	0.45	ND	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	ND	ND	ND	ND	2.00
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.50
Toluene	ND	ND	ND	ND	ND	0.89	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
NON-VOLATILE PRIORITY POLLUTANTS							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	241	279	304	162	247	142	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
Carbon disulfide	ND	1.6	ND	ND	0.40	0.51	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	ND	ND	ND	ND	ND	1.65	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	ND	ND	ND	ND	ND	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	10.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	5.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	10.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	25.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	10.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	10.00
Acenaphthene	ND	ND	ND	ND	ND	ND	5.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	10.00
Anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzidine	ND	ND	ND	ND	ND	ND	25.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	10.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	20.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	5.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	25.00
Butyl benzyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Chrysene	ND	ND	ND	ND	ND	ND	10.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	20.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	10.00
Fluoranthene	ND	ND	ND	ND	ND	ND	5.00
Fluorene	ND	ND	ND	ND	ND	ND	10.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	5.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	5.00
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	25.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	5.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	20.00
Isophorone	ND	ND	ND	ND	ND	ND	5.00
Naphthalene	ND	ND	ND	ND	ND	ND	5.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	5.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	10.00
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	10.00
N-Nitrosodiphenylamine	7.7	ND	ND	ND	1.93	2.57	5.00
Phenanthrene	ND	ND	ND	ND	ND	ND	10.00
Pyrene	ND	ND	ND	ND	ND	ND	10.00
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	25.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	10.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	10.00
4,6-Dinitro-o-cresol	NA	NA	NA	NA	NA	NA	25.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	50.00
p-Chloro-m-cresol	NA	NA	NA	NA	NA	NA	5.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	10.00
Phenol	ND	8.5	5.9	ND	3.6	3.00	5.00
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	ND	ND	ND	ND	ND	25.00
2-Methylnaphthalene	ND	ND	ND	ND	ND	ND	10.00
2-Methylphenol	ND	ND	ND	ND	ND	ND	25.00
2-Nitroaniline	ND	ND	ND	ND	ND	ND	10.00
3-Nitroaniline	ND	ND	ND	ND	ND	ND	10.00
4-Chloroaniline	ND	ND	ND	ND	ND	ND	10.00
3&4-Methylphenol	48	44	ND	ND	23	46	5.00
4-Nitroaniline	ND	ND	ND	ND	ND	ND	10.00
Aniline	ND	ND	ND	ND	ND	ND	10.00
Benzoic acid	ND	ND	ND	150	37.5	ND	10.00
Benzyl alcohol	ND	36	ND	ND	9.00	35	10.00
Dibenzofuran	ND	ND	ND	ND	ND	ND	10.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
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
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	NA	NA	NA	NA	NA	NA	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method quantitation limit, results below the ML are reported as ND
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	33.5	26.0	25.5	29.3	28.6	24.1	0.50
Bromoform	ND	ND	ND	ND	ND	ND	0.50
Bromomethane	ND	ND	ND	ND	ND	ND	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	103	122	74.3	103	101	87.6	0.50
Chloromethane	ND	ND	ND	ND	ND	ND	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	7.42	5.72	4.94	8.08	6.54	6.00	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	ND	ND	ND	ND	2.00
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.50
Toluene	ND	ND	ND	ND	ND	ND	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	2.51	3.50	ND	2.38	2.10	2.02	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
Carbon disulfide	ND	ND	ND	ND	ND	ND	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	ND	ND	ND	ND	ND	ND	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	ND	ND	ND	ND	ND	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	2.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	1.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	2.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	5.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	2.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	2.00
Acenaphthene	ND	ND	ND	ND	ND	ND	1.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	2.00
Anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzidine	ND	ND	ND	ND	ND	ND	5.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	2.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	4.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	1.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Ethylhexyl) phthalate	ND	12	11	ND	5.75	5.75	5.00
Butyl benzyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Chrysene	ND	ND	ND	ND	ND	ND	2.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	4.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	2.00
Fluoranthene	ND	ND	ND	ND	ND	ND	1.00
Fluorene	ND	ND	ND	ND	ND	ND	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	5.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	1.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	4.00
Isophorone	ND	ND	ND	ND	ND	ND	1.00
Naphthalene	ND	ND	ND	ND	ND	ND	1.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	1.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	2.00
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	2.00
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	1.00
Phenanthrene	ND	ND	ND	ND	ND	ND	2.00
Pyrene	ND	ND	ND	ND	ND	ND	2.00
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	5.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	2.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	2.00
4,6-Dinitro-o-cresol	NA	NA	NA	NA	NA	NA	5.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	10.0
p-Chloro-m-cresol	NA	NA	NA	NA	NA	NA	1.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	2.00
Phenol	ND	ND	ND	7.80	1.95	ND	1.00
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	ND	ND	ND	ND	ND	5.00
2-Methylnaphthalene	ND	ND	ND	ND	ND	ND	1.00
2-Methylphenol	ND	ND	ND	ND	ND	ND	5.00
2-Nitroaniline	ND	ND	ND	ND	ND	ND	1.00
3-Nitroaniline	ND	ND	ND	ND	ND	ND	1.00
4-Chloroaniline	ND	ND	ND	ND	ND	ND	1.00
3&4-Methylphenol	ND	ND	ND	ND	ND	ND	1.00
4-Nitroaniline	ND	ND	ND	ND	ND	ND	10.0
Aniline	ND	ND	ND	ND	ND	ND	1.00
Benzoic acid	ND	ND	ND	ND	ND	ND	1.00
Benzyl alcohol	0.3	ND	ND	ND	0.075	ND	1.00
Dibenzofuran	ND	ND	ND	ND	ND	ND	1.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2023-2024
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
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
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	ND	ND	ND	ND	ND	NA	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method quantitation limit, results below the ML are reported as ND
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF TOTAL DISSOLVED SOLIDS
EFFLUENT FY 2023-2024
MICHELSON WATER RECYCLING PLANT
(all test results in mg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/18/23-9/6/23	10/4/23-12/7/23	1/4/24-3/6/24	4/10/24-7/10/24	2023-2024	2022-2023	
TDS	614	601	691	671	644	657	50.0

ML method quantitation limit, results below the ML are reported as ND
ND non-detect
NA not analyzed
mg/L milligram per liter

Appendix H. Santa Ana Watershed Project Authority
(SAWPA) Reports, Data, SNC Notice



Santa Ana Watershed Project Authority

Over 50 Years of Innovation, Vision, and Watershed Leadership

August 29, 2024

Ms. Melissa Soriano
Senior Environmental Specialist
Environmental Compliance
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708-7018

Subject: Annual Report, Inland Empire Brine Line (FY 2023 – 2024)

Dear Ms. Soriano:

This annual report, including Chapter 7.4, Appendix F – Acknowledgements, and Appendix H – List of SIUs with Monitoring Compliance Status and Permittees with Pretreatment Equipment, has been prepared in the format provided by OC San. Additionally, supplemental information previously requested by OC San during annual report submittals, Appendix J – Monitoring and Compliance Status Report and Water Quality Data for the reporting period has also been developed. Information has been provided from SAWPA and its member/contract agencies: the City of Beaumont (Beaumont), Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), San Bernardino Valley Municipal Water District (Valley District), Western Municipal Water District (WMWD), and Yucaipa Valley Water District (YVWD).

1. Significant Noncompliance Publication.

SAWPA had no permittees who were in Significant Noncompliance during the period of July 1, 2023, through June 30, 2024.

2. Reporting Clarification.

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:
 - City of Colton - Agua Mansa Power Plant – 3/27/24 Control Authority sample
 - La Sierra University – 2/1/24 Self-Monitoring Report
 - Magnolia Foods – 2/8/24 Self-Monitoring Report
 - Pyrite Canyon Treatment Facility – March 2024 Self-Monitoring Report
 - Qualified Mobile, Inc. – 2/2/24 Self-Monitoring Report
 - Temescal Desalter – 1/10/24 and 1/16/24 Self-Monitoring Reports
 - Wellington Foods, Inc. – 1/9/24, 3/6/24 Self-Monitoring Reports

Bruce Whitaker
Chair
Orange County
Water District

Mike Gardner
Vice Chair
Western Municipal
Water District

T. Milford Harrison
Secretary-Treasurer
San Bernardino Valley
Municipal Water District

David J. Slawson
Commissioner
Eastern Municipal
Water District

Jasmin A. Hall
Commissioner
Inland Empire
Utilities Agency

Jeffrey J. Mosher
General Manager

b. The following monitoring data was sampled during the Fourth Quarter, but were entered or received after the Fourth Quarterly Report submittal:

- Rialto Bioenergy Facility, LLC – 5/24/24 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, 2023, through June 30, 2024) was 4,497 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
Kevin Nugent, OC San
Kayla Arias, OC San

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2023 – JUNE 30, 2024
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anita B. Smith Treatment Facility	WMWD	Direct	D1074-6	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	4	8	2			
Aramark Uniform & Career Apparel, LLC	WMWD	Direct	D1004-3	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	5	12	28			
California Institution for Men	IEUA	Direct	D1006-5	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	4	16	28			
Chino I Desalter	SAWPA	Direct	D1081-6	6905 Kimball Avenue Chino, CA 91709	221310	SIU	403.5(d)	-	4	8	4			
Chino II Desalter	SAWPA	Direct	D1010-6	11251 Harrel Street, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	16	8			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-2	715 East 4th Street, Beaumont, CA 92223	221320	SIU	403.5(d)	-	4	8	8			
City of Colton - Agua Mansa Power Plant	VALLEY	Direct	D1002-5	2040 W. Agua Mansa Road, Colton, CA 92324	221122	SIU	403.5(d)	-	4	10	10			IU Permit issued 8/17/23
Dart Container Corporation	WMWD	Direct	D1019-5	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	4	8	24			
Del Real, LLC	JCSD	Direct	D1021-5	11041 Inland Avenue, Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	5	40	28			
Eastside Water Treatment Plant	IEUA	Indirect	I1024-4	7537 Schaefer Avenue, Ontario, CA 91761	221310	SIU	403.5(d)	-	2	9	38			Indirect Permit Closed 1/17/24
Eastside Water Treatment Plant	IEUA	Direct	D1024-1	7537 Schaefer Avenue, Ontario, CA 91761	221310	SIU	403.5(d)	-	2	16	26			New Direct Permit Issued 1/17/24
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-6	29541 Murrieta Road, Menifee, CA 92586	221310	SIU	403.5(d)	-	4	16	8			
Inland Water Services	SBMWD	Indirect	I1066-4.1	939 W. Reece Street, San Bernardino, CA 92411	238220 454390 561990	SIU	403.5(d)	-	4	27	8			
In-N-Out Burger, Chino Distribution Center	IEUA	Direct	D1134-2	16000 Quality Way, Chino, CA 91708	493120 722513	SIU	403.5(d)	-	5	41	41			

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2023 – JUNE 30, 2024
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-6	4786 Etiwanda Avenue, Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	32	32			
JCSD Hamner Metering Station	SAWPA	Direct	D1045-6	5410 Hamner Avenue, Eastvale, CA 91752	221320	SIU	403.5(d)	-	4	16	16			
JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SAWPA	Direct	D1070-6	4150 Etiwanda Avenue, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	1	4			
JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-6	3474 De Forest Circle, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	0	0			
JCSD Wineville Metering Station	SAWPA	Direct	D1048-6	5101 Wineville Avenue, Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	15	32			
Metal Container Corporation	JCSD	Direct	D1056-5	10980 Inland Avenue, Jurupa Valley, CA 91752	322431	CIU	465.45(d)	-	4	40	16	Oil & Grease (mineral)		
Mission Linen Supply	IEUA	Direct	D1057-6	5400 Alton Street, Chino, CA 91710	812332	SIU	403.5(d)	-	4	44	46			
Mountainview Generating Station	VALLEY	Direct	D1058-4	2492 W. San Bernardino Ave., Redlands, CA 92374	221112	CIU	423.17	Y	4	20	24			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-4	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	4	12	1			
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-4	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	4	24	28			
OLS Energy	IEUA	Direct	D1059-5	5601 Eucalyptus Avenue, Chino, CA 91710	221112	CIU	423.17	Y	4	36	39			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-5	3400 Pyrite Street, Jurupa Valley, CA 92509	562910 562211	SIU	403.5(d)	-	4	34	252			
Repet, Inc.	IEUA	Direct	D1069-6	14207 Monte Vista Avenue, Chino, CA 91710	423930	SIU	403.5(d)	-	5	41	45	Oil & Grease (mineral)		
Rialto Bioenergy Facility, LLC	VALLEY	Direct	D1130-2	503 E. Santa Ana Avenue, Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	5	23	348			Permit Closed 6/12/24
Rialto Bioenergy Solutions, LLC	VALLEY	Direct	D1130-3	503 E. Santa Ana Avenue, Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	1	0	4			New Permit Issued 6/13/24

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2023 – JUNE 30, 2024
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
Skorpios Technologies, Inc.	EMWD	Indirect	I1136-1	41915 Business Park Drive, Temecula, CA 92590	334413	CIU	469.18	Y	4	9	8			
Temescal Desalter	WMWD	Direct	D1012-5	745 Public Safety Way, Corona, CA 92880	221310	SIU	403.5(d)	-	4	8	7			
Wellington Foods, Inc.	WMWD	Direct	D1086-5.1	1930 California Avenue, Corona, CA 92881	311999 325412	CIU	439(d)	-	4	15	28			CIU Permit Issued 4/10/24
WMWD Arlington Desalter	SAWPA	Direct	D1088-6	11611 Sterling Avenue, Riverside, CA 92503	221310	SIU	403.5(d)	-	4	8	4			
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-5	880 W. County Line, Road, Calimesa, CA 92320	221310 221320	SIU	403.5(d)	-	4	8	8			

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2023-2024
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	D1074-6	Anita B. Smith Treatment Facility	SIU 40 CFR 403.5(d)	0.030									X																	
WMWD	D1004-3	Aramark Uniform & Career Apparel, LLC	SIU 40 CFR 403.5(d)	0.330							X		X				X				X			X		X			X	
IEUA	I1005-4	C.C. Graber Company	IU 40 CFR 403.5(d)	N/A																	X									Sand Filters, Cartridge Filters
IEUA	D1006-5	California Institution for Men	SIU 40 CFR 403.5(d)	0.194										X																
IEUA	D1007-4	California Institution for Women	IU 40 CFR 403.5(d)	0.400											X															Grease Interceptors and Sewage Grinder
SAWPA	D1081-6	Chino I Desalter	SIU 40 CFR 403.5(d)	2.050										X																
SAWPA	D1010-6	Chino II Desalter	SIU 40 CFR 403.5(d)	1.620										X																
SAWPA	D1129-2	City of Beaumont Wastewater Treatment Plant	SIU 40 CFR 403.5(d)	0.550										X																
Valley	D1002-6	City of Colton - Agua Mansa Power Plant	IU 40 CFR 403.5(d)	0.062													X													Ultra-Filtration
WMWD	D1019-5	Dart Container Corporation	SIU 40 CFR 403.5(d)	0.060							X		X								X	X								
WMWD	I1020-4	Decra Roofing Systems	IU 40 CFR 403.5(d)	N/A							X		X									X		X		X				
JCSD	D1021-5	Del Real, LLC	SIU 40 CFR 403.5(d)	0.190			X				X		X	X							X			X						DAF & Automated Chemical Feed

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2023-2024
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	D1024-1	Eastside Water Treatment Facility	SIU 40 CFR 403.5(d)	0.065									X																	
SBMWD	I1003-5	Emerald Colton	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1061-6	EMWD Perris & Menifee Desalination Facility	SIU 40 CFR 403.5(d)	4.048										X																Filtration, Green Sand for Iron & Manganese
WMWD	D1029-4	Frutarom USA, Inc.	IU 40 CFR 403.5(d)	0.005								X	X				X				X	X								
IEUA	D1032-4	Green River Golf Club	IU 40 CFR 403.5(d)	0.020											X															Grease Interceptor
EMWD	I1133-1	Indian Oaks Campground, LLC	IU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1066-4.1	Inland Water Services	SIU 40 CFR 403.5(d)	N/A			X																							EC Meter and Diversion Valve
IEUA	D1134-2	In-N-Out Burger, Chino Distribution Center	SIU 40 CFR 403.5(d)	0.130								X												X						Rotary Screen
SAWPA	D1044-6	JCSD Etiwanda Metering Station	SIU 40 CFR 403.5(d)	0.900									X																	
SAWPA	D1045-6	JCSD Hamner Metering Station	SIU 40 CFR 403.5(d)	0.055									X																	
SAWPA	D1070-6	JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SIU 40 CFR 403.5(d)	0.250								X																		

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2023-2024
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	D1040-6	JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SIU 40 CFR 403.5(d)	0.050									X																		
SAWPA	D1048-6	JCSD Wineville Metering Station	SIU 40 CFR 403.5(d)	0.200									X																		
WMWD	I1050-5	La Sierra University	IU 40 CFR 403.5(d)	N/A									X																		
SBMWD	I1051-3	Loma Linda University Power Plant	IU 40 CFR 403.5(d)	N/A									X																	TDS Meter and Diversion Valve	
SBMWD	I1052-5	Loma Linda Veterans Medical Center	IU 40 CFR 403.5(d)	N/A									X																		
JCSD	D1053-4	Magnolia Foods, LLC	IU 40 CFR 403.5(d)	0.010											X						X									Grease Interceptor	
JCSD	D1056-5	Metal Container Corporation	CIU 40 CFR 465.45(d)	0.165								X	X				X						X	X	X	X				Oil Skimming	
IEUA	D1057-6	Mission Linen Supply	SIU 40 CFR 403.5(d)	0.713								X	X										X	X						Shaker Screens	
Valley	D1058-4	Mountainview Generating Station	CIU 40 CFR 423.17	0.432			X						X				X				X		X							Filtration	
IEUA	I1114-4	Niagra Bottling, LLC (IEUA)	SIU 40 CFR 403.5(d)	N/A									X																		
SBMWD	I1111-4	Niagra Bottling, LLC (SBMWD)	SIU 40 CFR 403.5(d)	N/A									X																		
IEUA	D1059-5	OLS Energy	CIU 40 CFR 423.17	0.130									X				X														

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2023-2024
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	I1062-5	Prudential Overall Supply	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1079-5	Pyrite Canyon Treatment Facility	SIU 40 CFR 403.5(d)	0.259								X		X				X								X				Air Strippers, Pesticide Co-Precipitation, Inline Cloth Filters, Granulated Activate Carbon Absorption
WMWD	I1064-5	Qualified Mobile, Inc.	IU 40 CFR 403.5(d)	N/A										X							X	X								
IEUA	D1069-6	Repet, Inc.	SIU 40 CFR 403.5(d)	0.043								X		X							X		X	X			X			GEM., Drum & Shaker Screens, Screw Press
Valley	D1130-2	Rialto Bioenergy Facility, LLC	SIU 40 CFR 403.5(d)	0.250								X		X						X	X		X	X		X	X	X		Biological Treatment
Valley	D1130-3	Rialto Bioenergy Solutions, LLC	SIU 40 CFR 403.5(d)	0.250								X		X						X	X		X	X		X	X	X		Biological Treatment
IEUA	I1096-4	San Antonio Regional Hospital	IU 40 CFR 403.5(d)	N/A									X																	
WMWD	I1128-2	Saratoga Foods Specialties - Eastvale	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1124-2	SCE Mira Loma Peaker Plant	IU 40 CFR 403.5(d)	N/A														X												
WMWD	I1078-6	Sierra Aluminum Company, Inc.	IU 40 CFR 403.5(d)	N/A									X																	
EMWD	I1136-1	Skorpios Technologies, Inc.	CIU 40 CFR 469.18	N/A										X							X					X				

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2023-2024
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other	
WMWD	D1012-5	Temescal Desalter	SIU 40 CFR 403.5(d)	2.150									X																		
WMWD	D1086-5.1	Wellington Foods, Inc.	CIU 40 CFR 439(d)	0.030							X		X								X	X									
SAWPA	D1088-6	WMWD Arlington Desalter	SIU 40 CFR 403.5(d)	1.400									X																		
SAWPA	D1090-5	YVWD – Henry Wochholz Regional Water Recycling Facility	SIU 40 CFR 403.5(d)	0.595									X																		



Appendix H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Anita B. Smith Treatment Facility	1	1	0	2	0	2	0	CAC		
2100 Fleetwood Drive	2	1	0	2	0	0	0	CAC		
Jurupa Valley, CA 92509	3	1	0	2	0	0	0	CAC		
Permit No. D1074-6	4	1	0	2	0	0	0	IAC	1	NOV/OCA: Failure to perform self monitoring
Aramark Uniform & Career Apparel, LLC	1	1	1	2	3	4	0	CAC		
1135 Hall Avenue	2	2	1	2	3	4	0	CAC		
Riverside, CA 92509	3	1	1	2	3	4	0	CAC		
Permit No. D1004-3	4	1	1	2	3	4	0	CAC		
C.C. Graber Company	1	0	0	0	0	0	0	CAC		
315 E. 4th Street	2	1	0	0	0	0	0	CAC		
Ontario, CA 91764	3	0	0	0	0	0	0	CAC		
Permit No. I1005-4	4	1	0	0	0	0	0	CAC		
California Institution for Men	1	1	1	3	3	3	0	CAC		
5997 Edison Avenue	2	1	1	3	3	5	0	CAC		
Chino, CA 91710	3	1	1	3	3	3	0	CAC		
Permit No. D1006-5	4	1	1	3	3	5	0	CAC		
California Institution for Women	1	1	3	6	3	6	0	CAC		
16756 Chino Corona Road	2	1	3	8	3	8	0	CAC		
Corona, CA 92880	3	1	3	5	3	6	0	CAC		
Permit No. D1007-4	4	1	3	8	3	8	0	CAC		
Chino I Desalter	1	1	1	1	1	1	0	CAC		
6905 Kimball Avenue	2	1	1	1	0	0	0	CAC		
Chino, CA 91709	3	1	1	1	1	1	0	CAC		
Permit No. D1081-6	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	2	2	0	CAC		
Permit No. D1010-6	4	1	2	2	0	0	0	CAC		
City of Beaumont Wastewater Treatment Plant	1	1	1	1	1	1	0	CAC		
715 East 4th Street	2	1	1	1	1	1	0	CAC		
Beaumont, CA 92223	3	1	1	1	1	1	0	CAC		
Permit No. D1129-2	4	1	1	1	1	1	0	CAC		
City of Colton - Agua Mansa Power Plant	1	1	0	0	1	4	0	CAC		IU Permit issued 8/17/23
2040 W. Agua Mansa Road	2	1	1	4	0	0	0	CAC		
Colton, CA 92324	3	1	1	4	1	4	0	CAC		
Permit No. D1002-6	4	1	0	0	0	0	0	CAC		
Dart Container Corporation	1	1	1	1	3	3	0	CAC		
150 S. Maple Street	2	1	1	1	3	3	0	CAC		
Corona, CA 92880	3	1	1	1	3	3	0	CAC		
Permit No. D1019-5	4	1	1	1	3	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 H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Decra Roofing Systems	1	0	0	0	0	3	0	CAC		
1230 Railroad Street	2	1	0	3	0	3	0	CAC		
Corona, CA 92882	3	0	0	0	0	3	0	CAC		
Permit No. I1020-4	4	1	0	3	0	0	0	CAC		
Del Real, LLC	1	1	4	6	4	3	0	CAC		
11041 Inland Avenue	2	1	4	6	4	3	0	CAC		
Jurupa Valley, CA 91752	3	2	4	6	4	3	0	CAC		
Permit No. D1021-5	4	1	4	6	4	3	0	CAC		
Eastside Water Treatment Plant	1	1	0	6	0	18	0	CAC		
7537 Schaefer Avenue	2	1	0	3	0	14	0	CAC		
Ontario, CA 91761	3	0	0	0	0	6	0	CAC		Indirect Permit Closed 1/17/24
Permit No. I1024-4	4	0	0	0	0	0	0	CAC		
Eastside Water Treatment Plant	1	0	0	0	0	0	0	CAC		
7537 Schaefer Avenue	2	0	0	0	0	0	0	CAC		
Ontario, CA 91761	3	1	2	6	4	4	0	CAC		New Direct Permit Issued 1/17/24
Permit No. D1024-1	4	1	2	6	6	12	0	CAC		
Emerald Colton	1	0	0	0	0	0	0	CAC		
925 South 8th Street	2	0	0	0	0	0	0	CAC		
Colton, CA 92324	3	1	0	6	0	3	0	CAC		
Permit No. I1003-5	4	0	0	0	0	0	0	CAC		
EMWD Perris & Menifee Desalination Facility	1	1	2	2	2	2	0	CAC		
29541 Murrieta Road	2	1	2	2	0	0	0	CAC		
Menifee, CA 92586	3	1	2	2	2	2	0	CAC		
Permit No. D1061-6	4	1	2	2	0	0	0	CAC		
Frutarom USA, Inc.	1	1	0	2	0	6	0	CAC		
790 E. Harrison Street	2	0	0	3	0	7	0	CAC		
Corona, CA 92879	3	1	0	2	0	6	0	CAC		
Permit No. D1029-4	4	1	0	3	0	7	0	IAC	1	NOV/OCA: Sulfide (dissolved) violation
Green River Golf Club	1	0	0	0	3	3	0	CAC		NOV/OCA: May 2023 pH violation
5215 Green River Road	2	1	1	1	3	3	0	CAC		
Corona, CA 92880	3	1	0	0	3	3	0	CAC		
Permit No. D1032-4	4	0	1	3	3	4	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 H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Indian Oaks Campground, LLC	1	0	0	0	0	2	0	CAC		
38120 E. Benton Road	2	0	0	0	0	0	0	CAC		
Temecula, CA 92593	3	1	0	0	0	0	0	CAC		
Permit No. I1133-1	4	0	0	0	0	0	0	CAC		
Inland Water Services	1	1	0	7	0	3	0	CAC		
939 West Reece Street	2	1	0	6	0	1	0	CAC		
San Bernardino, CA 92411	3	1	0	8	0	3	0	CAC		
Permit No. I1066-4.1	4	1	0	6	0	1	0	CAC		
In-N-Out Burger, Chino Distribution Center	1	2	2	6	3	7	0	IAC	1	NOV/OCA: Flow rate violation
16000 Quality Way	2	1	3	8	3	7	0	CAC		
Chino, CA 91708	3	1	3	8	4	7	0	CAC		
Permit No. D1134-2	4	1	3	8	3	7	0	CAC		
JCSD Etiwanda Metering Station	1	1	3	5	3	5	0	CAC		
4786 Etiwanda Avenue	2	1	3	3	3	5	0	CAC		
Jurupa Valley, CA 91752	3	1	3	7	3	5	0	CAC		
Permit No. D1044-6	4	1	3	5	3	5	0	CAC		
JCSD Hamner Metering Station	1	1	1	3	1	3	0	CAC		
5410 Hamner Avenue	2	1	1	3	1	3	0	CAC		
Eastvale, CA 91752	3	1	1	3	1	3	0	CAC		
Permit No. D1045-6	4	1	1	3	1	3	0	CAC		
JCSD Roger D. Teagarden Ion Exchange WTP	1	1	1	0	1	3	0	CAC		
4150 Etiwanda Avenue	2	1	0	0	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	0	0	0	0	0	CAC		
Permit No. D1070-6	4	1	0	0	0	0	0	CAC		
JCSD Wells 17 & 18 Ion Exchange TF	1	1	0	0	0	0	0	CAC		
3474 De Forest Circle	2	1	0	0	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	0	0	0	0	0	CAC		
Permit No. D1040-6	4	1	0	0	0	0	0	CAC		
JCSD Wineville Metering Station	1	1	1	2	3	5	0	CAC		
5101 Wineville Avenue	2	1	1	3	3	5	0	CAC		
Jurupa Valley, CA 91752	3	1	1	3	3	5	0	CAC		
Permit No. D1048-6	4	1	1	3	3	5	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 H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
La Sierra University	1	0	0	0	0	0	0	CAC		
4500 Riverwalk Pkwy.	2	0	0	0	0	0	0	CAC		
Riverside, CA 92505	3	1	0	2	0	2	0	CAC		
Permit No. I1050-5	4	0	0	0	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	4	0	CAC		
Permit No. I1052-5	4	1	0	0	0	0	0	CAC		
Magnolia Foods	1	1	4	6	1	3	0	CAC		
11058 Philadelphia Avenue	2	1	3	3	0	0	0	CAC		
Mira Loma, CA 91752	3	1	4	6	1	3	0	CAC		
Permit No. D1053-4	4	0	3	3	0	0	0	CAC		
Metal Container Corporation	1	1	4	7	1	5	0	CAC		
10980 Inland Avenue	2	1	4	4	1	1	0	CAC		
Jurupa Valley, CA 91752	3	1	4	9	1	5	0	CAC		
Permit No. D1056-5	4	1	4	4	1	1	0	CAC		
Mission Linen Supply	1	1	3	8	3	7	0	CAC		
5400 Alton Street	2	1	3	8	3	7	0	CAC		
Chino, CA 91710	3	1	3	8	4	8	0	CAC		
Permit No. D1057-6	4	1	3	8	4	10	0	CAC		
Mountainview Generating Station	1	1	2	3	2	3	0	CAC		
2492 W. San Bernardino Avenue	2	1	2	3	2	4	0	CAC		
Redlands, CA 92374	3	1	2	3	2	4	0	CAC		
Permit No. D1058-4	4	1	2	3	3	4	0	CAC		
Niagara Bottling, LLC (IEUA)	1	1	0	3	0	0	0	CAC		
1401 N. Alder Avenue	2	1	0	3	0	0	0	CAC		
Rialto, CA 92376	3	1	0	3	0	0	0	CAC		
Permit No. I1114-4	4	1	0	3	0	1	0	CAC		
Niagara Bottling, LLC (SBMWD)	1	1	0	6	0	7	0	CAC		
1401 N. Alder Avenue	2	1	0	6	0	7	0	CAC		
Rialto, CA 92376	3	1	0	6	0	7	0	CAC		
Permit No. I1111-4	4	1	0	6	0	7	0	CAC		

COMPLIANCE STATUS	
ID - Insufficient Data	SNC - Significant Non Compliance
CAC - Consistently Achieving Compliance	NOV/OCA - Notice of Violation and Order for Corrective Action
IAC - Inconsistently Achieving Compliance	WW - Written Warning



Appendix H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
OLS Energy	1	1	2	6	4	4	0	CAC		
5601 Eucalyptus Avenue	2	1	2	9	4	7	0	CAC		
Chino, CA 91710	3	1	2	6	4	8	0	CAC		
Permit No. D1059-5	4	1	2	7	4	4	0	CAC		
Prudential Overall Supply	1	0	0	0	0	0	0	CAC		
6997 Jurupa Ave	2	0	0	0	0	0	0	CAC		
Riverside, CA 92504	3	1	0	2	0	0	0	CAC		
Permit No. I1062-5	4	0	0	2	0	0	0	IAC	1	NOV/OCA: Failure to perform self monitoring
Pyrite Canyon Treatment Facility	1	1	2	6	18	42	0	CAC		
3400 Pyrite Street	2	1	2	6	18	46	0	CAC		
Jurupa Valley, CA 92509	3	1	2	6	18	46	0	CAC		
Permit No. D1079-5	4	1	2	8	18	46	0	CAC		
Qualified Mobile, Inc.	1	0	0	0	0	0	0	CAC		
1648 Industrial Ave., Suite A	2	0	0	0	0	0	0	CAC		
Norco, CA 92860	3	0	0	0	0	2	0	CAC		
Permit No. I1064-5	4	1	0	2	0	0	0	CAC		
Repet, Inc.	1	1	3	6	4	8	0	CAC		
14207 Monte Vista Avenue	2	2	3	8	3	8	0	CAC		
Chino, CA 91710	3	1	3	6	3	6	0	CAC		
Permit No. D1069-6	4	1	3	9	3	10	0	IAC	1	NOV/OCA: Oil & Grease (mineral) violation
Rialto Bioenergy Facility, LLC	1	2	1	5	56	50	0	IAC	2	NOV/OCA & Violation Meeting: BOD & TSS violations
503 E. Santa Ana Avenue	2	1	1	5	49	48	0	CAC		
Bloomington, CA 92316	3	1	1	4	47	39	0	CAC		
Permit No. D1130-2	4	1	1	5	30	29	0	CAC		Permit Closed 6/12/24
Rialto Bioenergy Solutions, LLC	1	0	0	0	0	0	0	CAC		
503 E. Santa Ana Avenue	2	0	0	0	0	0	0	CAC		
Bloomington, CA 92316	3	0	0	0	0	0	0	CAC		
Permit No. D1130-3	4	1	0	0	2	2	0	CAC		New Permit Issued 6/13/24
San Antonio Regional Hospital	1	0	0	0	0	8	0	CAC		
999 San Bernardino Road	2	1	0	4	0	7	0	CAC		
Upland, CA 91786	3	1	0	0	0	6	0	CAC		
Permit No. I1096-4	4	0	0	3	0	7	0	CAC		
Saratoga Foods, Inc.	1	1	0	3	0	3	0	IAC	1	NOV/OCA: pH violation
6285 Providence Way	2	0	0	0	0	0	0	CAC		
Eastvale, CA 92880	3	0	0	0	0	0	0	CAC		
Permit No. I1128-2	4	1	0	5	0	3	0	CAC		
SCE Mira Loma Peaker Plant	1	0	0	0	0	6	0	CAC		
13568 S. Milliken Avenue	2	1	0	5	0	0	0	CAC		
Ontario, CA 91762	3	1	0	5	0	0	0	CAC		
Permit No. D1124-2	4	0	0	0	0	5	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 H
Monitoring and Compliance Status Report
July 1, 2023 - June 30, 2024



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OC SAN SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Sierra Aluminum Company	1	0	0	0	0	0	0	CAC		
2345 Fleetwood Dr.	2	1	0	3	0	0	0	CAC		
Riverside, CA 92509	3	0	0	0	0	0	0	CAC		
Permit No. I1078-5	4	0	0	0	0	2	0	CAC		
Skorpios Technologies, Inc.	1	1	2	2	2	2	0	CAC		
41915 Business Park Drive	2	1	2	3	2	2	0	CAC		
Temecula, CA 92590	3	1	2	2	2	2	0	CAC		
Permit No. I1136-1	4	1	2	2	2	2	0	CAC		
Temescal Desalter	1	1	1	1	2	1	0	CAC		
745 Public Safety Way	2	1	1	1	0	0	0	CAC		
Corona, CA 92880	3	1	1	1	2	2	0	CAC		
Permit No. D1012-5	4	1	1	1	0	0	0	CAC		
Wellington Foods, Inc.	1	1	1	2	3	4	0	CAC		
1930 California Avenue	2	1	1	2	3	4	0	CAC		
Corona, CA 92881	3	1	1	2	3	4	0	CAC		CIU Permit Issued 4/10/24
Permit No. D1086-5.1	4	1	2	4	3	4	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. D1088-6	4	1	1	1	0	0	0	CAC		
YVWD Henry Wochholz RWRF	1	1	1	1	1	1	0	CAC		
880 W. County Line Road	2	1	1	1	1	1	0	CAC		
Calimesa, CA 92320	3	1	1	1	1	1	0	CAC		
Permit No. D1090-5	4	1	1	1	1	1	0	CAC		

COMPLIANCE STATUS	
ID - Insufficient Data	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 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2492162	0.02	0.02	0.02	0.10	0.02	0.10		
	2492161	0.02	0.02	0.02	0.10	0.02	0.10		
	2492160	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2492159	0.02	0.02	0.02	0.10	0.02	0.10		
	2492157	0.02	0.02	0.02	0.10	0.02	0.10		
	2492158	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg-Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-531422	2575412		0.02	0.74	1.40	0.29	0.02	0.10	
		2529805	0.02	0.58	1.07	0.22	0.02	0.10	
					24.24	26.72			Relative % Difference
1-601023	2575408		0.02	0.06	0.25	0.10	0.02	0.10	
		2529593	0.02	0.05	0.20	0.10	0.02	0.10	
					22.22				Relative % Difference
1-521805	2575410		0.02	0.02	0.07	0.10	0.02	0.56	
		2529583	0.02	0.03	0.05	0.10	0.02	0.43	
									Relative % Difference
1-021062	2575413		0.02	0.03	1.14	0.10	0.02	0.20	
		2530109	0.02	0.02	0.86	0.10	0.02	0.13	
					28.00				Relative % Difference
			0%	24%	26%	0%	0%	0%	Analyte Avg. RPD
							25%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR AUGUST 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
								Reporting Limit (mg/L)	
Sampler A	2499035	0.02	0.02	0.02	0.10	0.02	0.10		
	2499036	0.02	0.02	0.02	0.10	0.02	0.10		
	2499034	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2499033	0.02	0.02	0.02	0.10	0.02	0.10		
	2499032	0.02	0.02	0.02	0.10	0.02	0.10		
	2499031	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
	2575414		0.02	0.05	0.04	0.14	0.02	0.10	
		2531042	0.02	0.05	0.04	0.13	0.02	0.10	
									Relative % Difference
	2532552		0.02	0.55	0.16	0.40	0.02	0.34	
		2532552	0.02	0.59	0.16	0.41	0.02	0.35	
									Relative % Difference
	2575415		0.02	0.04	0.11	0.10	0.02	0.72	
		2532396	0.02	0.04	0.13	0.10	0.02	0.63	
									Relative % Difference
	2575417		0.02	0.02	0.04	0.10	0.02	0.10	
		2532371	0.02	0.02	0.04	0.10	0.02	0.10	
									Relative % Difference
			0%	7%	8%	0%	0%	13%	Analyte Avg. RPD
							10%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR SEPTEMBER 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
									Reporting Limit (mg/L)
Sampler A	2505247	0.02	0.02	0.02	0.10	0.02	0.10		
	2505248	0.02	0.02	0.02	0.10	0.02	0.10		
	2505244	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2505243	0.02	0.02	0.02	0.10	0.02	0.10		
	2505242	0.02	0.02	0.02	0.10	0.02	0.10		
	2505240	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
	2575557		0.02	0.28	0.47	0.18	0.02	1.01	
		2532581	0.02	0.26	0.47	0.15	0.02	1.03	
				7.41	0.00			1.96	Relative % Difference
	2575560		0.02	0.14	0.02	0.17	0.02	0.10	
		2534216	0.02	0.15	0.06	0.16	0.02	0.10	
				6.90					Relative % Difference
	2575558		0.02	0.02	0.37	0.10	0.02	1.80	
		2532603	0.02	0.02	0.38	0.10	0.02	1.70	
					2.67			5.71	Relative % Difference
	2575559		0.02	0.02	0.05	0.10	0.02	0.47	
		2533879	0.02	0.02	0.05	0.10	0.02	0.40	
									Relative % Difference
			0%	7%	1%	0%	0%	4%	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 greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR OCTOBER 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2513031	0.02	0.02	0.02	0.10	0.02	0.10		
	2513030	0.02	0.02	0.02	0.10	0.02	0.10		
	2513029	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2513028	0.02	0.02	0.02	0.10	0.02	0.10		
	2513027	0.02	0.02	0.02	0.10	0.02	0.10		
	2513026	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-601843	2575564		0.02	0.02	0.02	0.10	0.02	0.10	
		2537348	0.02	0.02	0.03	0.10	0.02	0.10	
									Relative % Difference
1-521761	2575561		0.02	0.02	0.28	0.10	0.12	0.10	
		2534207	0.02	0.02	0.29	0.10	0.13	0.10	
					3.51		8.00		Relative % Difference
1-021336	2575563		0.02	0.06	0.07	0.10	0.02	0.10	
		2537091	0.02	0.07	0.07	0.10	0.02	0.10	
									Relative % Difference
1-021337	2575562		0.02	0.02	0.08	0.23	0.02	0.18	
		2535513	0.02	0.02	0.07	0.21	0.02	0.17	
									Relative % Difference
			0%	0%	4%	0%	8%	0%	Analyte Avg. RPD
							6%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR NOVEMBER 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2521109	0.02	0.02	0.02	0.10	0.02	0.10		
	2521108	0.02	0.02	0.02	0.10	0.02	0.10		
	2521107	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2521106	0.02	0.02	0.02	0.10	0.02	0.10		
	2521105	0.02	0.02	0.02	0.10	0.02	0.10		
	2521102	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-031341	2576816		0.02	0.02	0.54	0.63	0.02	0.10	
		2540003	0.02	0.02	0.41	0.52	0.02	0.10	
					27.37	19.13			Relative % Difference
1-521852	2576814		0.02	0.05	0.15	0.35	0.02	0.10	
		2531265	0.02	0.05	0.14	0.35	0.02	0.10	
					6.90				Relative % Difference
1-031120	2576813		0.02	0.06	0.12	0.10	0.02	0.10	
		2535671	0.02	0.06	0.11	0.10	0.02	0.10	
					8.70				Relative % Difference
1-511370	2576815		0.02	0.02	0.26	0.77	0.02	0.22	
		2540573	0.02	0.02	0.24	0.72	0.02	0.21	
					8.00	6.71			Relative % Difference
			0%	0%	13%	13%	0%	0%	Analyte Avg. RPD
							13%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR DECEMBER 2023
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2528071	0.02	0.02	0.02	0.10	0.02	0.10		
	2528072	0.02	0.02	0.02	0.10	0.02	0.10		
	2528069	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2528065	0.02	0.02	0.02	0.10	0.02	0.10		
	2528068	0.02	0.02	0.02	0.10	0.02	0.10		
	2528067	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600708	2576819		0.02	0.03	0.17	0.25	0.02	0.12	
		2540353	0.02	0.03	0.16	0.24	0.02	0.11	
					6.06				Relative % Difference
1-521790	2576817		0.02	0.02	0.48	0.10	0.09	0.10	
		2540907	0.02	0.02	0.44	0.10	0.09	0.10	
					8.70				Relative % Difference
1-600316	2576818		0.02	0.04	0.13	0.19	0.02	0.10	
		2541886	0.02	0.04	0.12	0.17	0.02	0.10	
					8.00				Relative % Difference
1-521858	2576963		0.02	0.02	0.06	0.10	0.02	0.26	
		2543031	0.02	0.02	0.06	0.10	0.02	0.35	
									Relative % Difference
			0%	0%	8%	0%	0%	0%	Analyte Avg. RPD
							8%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JANUARY 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
								Reporting Limit (mg/L)	
Sampler A	2535446	0.02	0.02	0.02	0.10	0.02	0.10		
	2535444	0.02	0.02	0.02	0.10	0.02	0.10		
	2535445	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2535434	0.02	0.02	0.02	0.10	0.02	0.10		
	2535440	0.02	0.02	0.02	0.10	0.02	0.10		
	2535439	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
								Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-531419	2576820		0.02	0.02	0.19	0.10	0.02	0.26	
		2543322	0.02	0.02	0.20	0.10	0.02	0.33	
					5.13				Relative % Difference
1-031110	2576966		0.07	0.05	0.04	0.15	0.02	0.10	
		2548083	0.06	0.05	0.03	0.13	0.02	0.10	
									Relative % Difference
1-601974	2576964		0.02	0.02	1.24	0.43	0.02	0.10	
		2542980	0.02	0.02	1.23	0.45	0.02	0.10	
					0.81				Relative % Difference
1-061115	2576968		0.02	0.50	0.14	0.34	0.02	0.10	
		2549848	0.02	0.45	0.13	0.32	0.02	0.10	
				10.53	7.41				Relative % Difference
			0%	11%	4%	0%	0%	0%	Analyte Avg. RPD
								7%	Table Average RPD

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR FEBRUARY 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2541813	0.02	0.02	0.02	0.10	0.02	0.10		
	2541815	0.02	0.02	0.02	0.10	0.02	0.10		
	2541812	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2541814	0.02	0.02	0.02	0.10	0.02	0.10		
	2541811	0.02	0.02	0.02	0.10	0.02	0.10		
	2541810	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600981	2576965		0.04	0.05	0.17	0.40	0.03	0.77	
		2543795	0.04	0.05	0.16	0.41	0.03	0.89	
					6.06			14.46	Relative % Difference
1-521809	2576970		0.02	0.22	0.06	0.44	0.02	1.19	
		2545271	0.02	0.20	0.05	0.43	0.02	1.07	
				9.52				10.62	Relative % Difference
1-601701	2576969		0.02	0.02	0.02	0.10	0.02	0.37	
		2549811	0.02	0.02	0.02	0.11	0.02	0.34	
									Relative % Difference
1-601843	2582979		0.02	0.14	0.19	1.23	0.51	0.17	
		2552751	0.02	0.14	0.18	1.12	0.50	0.15	
				0.00	5.41	9.36	1.98		Relative % Difference
			0%	5%	6%	9%	2%	13%	Analyte Avg. RPD
							7%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MARCH 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2549770	0.02	0.02	0.02	0.10	0.02	0.10		
	2549769	0.02	0.02	0.02	0.10	0.02	0.10		
	2549771	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2549767	0.02	0.02	0.02	0.10	0.02	0.10		
	2549766	0.02	0.02	0.02	0.10	0.02	0.10		
	2549768	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
	2576967		0.02	0.02	0.46	0.10	0.02	0.10	
		2546347	0.02	0.02	0.53	0.10	0.02	0.13	
					14.14				Relative % Difference
	2582978		0.02	0.13	0.05	0.10	0.02	0.10	
		2550947	0.02	0.13	0.04	0.10	0.02	0.10	
				0.00					Relative %Difference
	2582982		0.02	0.02	0.05	0.10	0.02	0.11	
		2553967	0.02	0.02	0.05	0.10	0.02	0.14	
									Relative % Difference
	2582980		0.02	0.09	0.83	0.23	0.02	1.07	
		2552958	0.02	0.09	0.82	0.23	0.02	1.00	
					1.21			6.76	Relative % Difference
			0%	0%	8%	0%	0%	7%	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 greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR APRIL 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2556066	0.02	0.02	0.02	0.10	0.02	0.10		
	2556065	0.02	0.02	0.02	0.10	0.02	0.10		
	2556064	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2556063	0.02	0.02	0.02	0.10	0.02	0.10		
	2556062	0.02	0.02	0.02	0.10	0.02	0.10		
	2556061	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600503	2582981		0.02	0.02	0.54	0.16	0.02	0.10	
		2553969	0.02	0.02	0.52	0.15	0.02	0.10	
					3.77				Relative % Difference
1-601701	2582984		0.02	0.03	0.02	0.10	0.02	0.19	
		2556890	0.02	0.03	0.02	0.10	0.02	0.17	
									Relative % Difference
1-511370	2582987		0.02	0.02	0.10	0.44	0.02	0.10	
		2557357	0.02	0.02	0.09	0.43	0.02	0.10	
									Relative % Difference
1-601023	2582986		0.02	0.18	0.42	0.15	0.02	0.14	
		2553060	0.02	0.16	0.40	0.14	0.02	0.14	
				11.76	4.88				Relative % Difference
			0%	12%	4%	0%	0%	0%	Analyte Avg. RPD
							8%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MAY 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
								Reporting Limit (mg/L)	
Sampler A	2562942	0.02	0.02	0.02	0.10	0.02	0.10		
	2562943	0.02	0.02	0.02	0.10	0.02	0.10		
	2562939	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2562940	0.02	0.02	0.02	0.10	0.02	0.10		
	2562941	0.02	0.02	0.02	0.10	0.02	0.10		
	2562938	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-031341	2582983		0.02	0.08	0.22	0.85	0.02	0.12	
		2555255	0.02	0.08	0.21	0.76	0.02	0.10	
					4.65	11.18			Relative % Difference
1-531422	2582993		0.02	0.38	0.41	0.25	0.02	0.10	
		2557353	0.02	0.37	0.41	0.23	0.02	0.10	
				2.67	0.00				Relative % Difference
1-021337	2582994		0.02	0.02	0.12	0.28	0.10	0.27	
		2559742	0.02	0.02	0.12	0.26	0.09	0.25	
					0.00				Relative % Difference
1-531415	2582995		0.02	0.02	0.02	0.10	0.02	0.25	
		2559733	0.02	0.02	0.03	0.10	0.02	0.22	
									Relative % Difference
			0%	3%	2%	11%	0%	0%	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 greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JUNE 2024
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
Sampler A	2570790	0.02	0.02	0.02	0.10	0.02	0.10		
	2570789	0.02	0.02	0.02	0.10	0.02	0.10		
	2570788	0.02	0.02	0.02	0.10	0.02	0.10		
Sampler B	2570786	0.02	0.02	0.02	0.10	0.02	0.10		
	2570787	0.02	0.02	0.02	0.10	0.02	0.10		
	2570785	0.02	0.02	0.02	0.10	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011038	2582985		0.02	0.12	1.31	0.10	0.02	1.31	
		2552957	0.02	0.12	1.29	0.10	0.02	1.31	
				0.00	1.54			0.00	Relative % Difference
1-011155	2582996		0.02	0.02	0.14	0.23	0.02	0.10	
		2561189	0.02	0.02	0.13	0.23	0.02	0.10	
					7.41				Relative % Difference
1-521809	2561606		0.02	0.09	0.04	0.12	0.02	0.17	
		2582998	0.02	0.09	0.06	0.14	0.02	0.19	
									Relative % Difference
1-601974	2582999		0.02	0.02	2.89	0.82	0.10	0.10	
		2562435	0.02	0.02	2.92	0.82	0.11	0.10	
					1.03	0.00	9.52		Relative % Difference
			0%	0%	3%	0%	10%	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 greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2023/24
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JUL-SEP 2023									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2490870	0.02	0.02	0.02	0.10	0.02	0.10	1.0	2490871
	2490804	0.02	0.02	0.02	0.10	0.02	0.10	0.9	2490813
	2490805	0.02	0.02	0.02	0.10	0.02	0.10	0.8	2490814
	2490806	0.02	0.02	0.02	0.10	0.02	0.10	1.1	2490815
	2490807	0.02	0.02	0.02	0.10	0.02	0.10	1.1	2490816
Average Range		0.02	0.02	0.02	0.10	0.02	0.10	1.0	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	0.3	
Sampler Average Deviation		--	--	--	--	--	--	--	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2490808	0.02	0.02	0.02	0.10	0.02	0.10	1.0	2490817
	2490809	0.02	0.02	0.02	0.10	0.02	0.10	1.2	2490819
	2490811	0.02	0.02	0.02	0.10	0.02	0.10	1.2	2490818
	2490810	0.02	0.02	0.02	0.10	0.02	0.10	1.1	2490820
	2490812	0.02	0.02	0.02	0.10	0.02	0.10	1.2	2490821
Average Range		0.02	0.02	0.02	0.10	0.02	0.10	1.1	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	0.2	
Sampler Average Deviation		--	--	--	--	--	--	--	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	--	
Reporting Limits		0.02	0.02	0.02	0.10	0.02	0.10	1.0	
SAMPLE COLLECTION CHECK RESULTS, OCT-DEC 2023									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2511254	0.02	0.03	0.02	0.10	0.02	0.10	5.2	2510130
	2510121	0.02	0.03	0.02	0.10	0.02	0.10	6.7	2510131
	2510122	0.02	0.03	0.02	0.10	0.02	0.10	6.7	2510132
	2510123	0.02	0.03	0.02	0.10	0.02	0.10	6.7	2510133
	2510129	0.02	0.03	0.02	0.10	0.02	0.10	6.7	2510135
Average Range		0.02	0.03	0.02	0.10	0.02	0.10	6.4	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	1.5	
Sampler Average Deviation		--	--	--	--	--	--	0.5	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	0.02	0.03	0.02	0.10	0.02	0.10	7.3	0.02	0.03
	0.02	0.03	0.02	0.10	0.02	0.10	9.3	0.02	0.03
	0.02	0.03	0.02	0.10	0.02	0.10	6.7	0.02	0.03
	0.02	0.03	0.02	0.10	0.02	0.10	6.7	0.02	0.03
	0.02	0.03	0.02	0.10	0.02	0.10	6.7	0.02	0.03
Average Range		0.02	0.03	0.02	0.10	0.02	0.10	7.3	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	2.6	
Sampler Average Deviation								0.8	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
								13.7	
Reporting Limits		0.02	0.02	0.02	0.10	0.02	0.10	1.0	

Bold numbers are greater than five times the RLs. Results and RLs are reported in mg/L.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2022/23
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JAN-MAR 2024									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2539919	0.02	0.06	0.02	0.10	0.02	0.10	5.6	2539920
	2539980	0.02	0.06	0.02	0.10	0.02	0.10	5.3	2539989
	2539981	0.02	0.06	0.02	0.10	0.02	0.10	5.7	2539990
	2539982	0.02	0.06	0.02	0.10	0.02	0.10	5.4	2539991
	2539983	0.02	0.06	0.02	0.10	0.02	0.10	5.5	2539992
Average Range		0.02	0.06	0.02	0.10	0.02	0.10	5.5	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	0.4	
Sampler Average Deviation								0.1	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2539984	0.02	0.06	0.02	0.10	0.02	0.10	5.6	2539993
	2539985	0.02	0.06	0.02	0.10	0.02	0.10	6.0	2539994
	2539986	0.02	0.07	0.02	0.10	0.02	0.10	5.9	2539996
	2539987	0.02	0.06	0.02	0.10	0.02	0.10	5.5	2539997
	2539988	0.02	0.06	0.02	0.10	0.02	0.10	5.8	2539998
Average Range		0.02	0.06	0.02	0.10	0.02	0.10	5.8	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	0.5	
Sampler Average Deviation								0.2	
Site Relative Percent Difference								4.6	
Reporting Limits		0.02	0.02	0.02	0.10	0.02	0.10	1.0	
SAMPLE COLLECTION CHECK RESULTS, APR-JUN 2024									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	0.02	0.02	0.10	0.10	0.02	0.10	14.0	2252570	0.02
	0.02	0.02	0.10	0.10	0.02	0.10	14.0	2552503	0.02
	0.02	0.02	0.10	0.10	0.02	0.10	14.0	2552504	0.02
	0.02	0.02	0.10	0.10	0.02	0.10	13.0	2552505	0.02
	0.02	0.02	0.10	0.10	0.02	0.10	13.0	2552506	0.02
Average Range		0.02	0.02	0.10	0.10	0.02	0.10	13.6	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	1.0	
Sampler Average Deviation		--	--	--	--	--	--	0.5	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2552515	0.02	0.02	0.12	0.10	0.02	0.10	20.0	2552507
	2552516	0.02	0.02	0.12	0.10	0.02	0.10	20.0	2552508
	2552518	0.02	0.02	0.12	0.10	0.02	0.10	22.0	2552509
	2552519	0.02	0.02	0.12	0.10	0.02	0.10	21.0	2552510
	2552513	0.02	0.02	0.12	0.10	0.02	0.10	21.0	2552511
Average Range		0.02	0.02	0.12	0.10	0.02	0.10	20.8	Average Range
		0.00	0.00	0.00	0.00	0.00	0.00	2.0	
Sampler Average Deviation		--	--	0.00	--	--	--	0.6	
Site Relative Percent Difference				20.18				41.9	
Reporting Limits		0.02	0.02	0.02	0.10	0.02	0.10	1.0	

Results are shown only for results greater than 5 times the Reporting Limit. Bold numbers are results at or above the RLs. Results and RLs are reported in mg/L

Appendix J. Permittees with Pretreatment Equipment

Air Industries Company, A PCC Company (Knott)	1-531404	433.17(a), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(h), 471.35(i), 471.35(k), 471.35(l), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(y), 471.35(z), 471.65(f), 471.65(g), 471.65(h), 471.65(j), 471.65(l), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(u), 471.65(w), 471.65(x)	•	•	X	•	X	X	•	•	X	X	•	•	•	•	•	•	X	X	•	•	•	•	•	X	•	X	X	•	X													
All Metals Processing of Orange County, LLC	1-031110	433.17(a)	•	•	•	•	•	X	•	•	X	•	•	•	•	X	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Allen T. Campbell Trust c/o Bowyer Environmental Consulting, Inc.	S-600341	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Allied Electronics Services, Inc.	1-011073	433.17(a)	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Allied International	1-031107	417.166, 417.176, 417.66, 417.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	464.16(a), 464.16(c),	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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		
		464.16(h), 464.46(a), 464.46(b), 464.46(d)																													
Alloy Tech Electropolishing, Inc.	1-011036	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	X	•	X	
AlSCO, Inc. dba AlSCO Uniforms	1-021656	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	
Aluminum Forge - Div. of Alum. Precision	1-071035	467.46, 471.65(i), 471.65(j)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	X	•	•	
Aluminum Precision Products, Inc. (Central)	1-011038	467.45	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	
Aluminum Precision Products, Inc. (Susan)	1-011100	467.45, 467.46	•	•	•	•	X	•	•	X	X	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	X	•	•	•	
Amerimax Building Products	1-021102	465.35	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Ameripecc, Inc.	1-031057	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	
Anaheim Extrusion Co., Inc.	1-021168	467.35(c)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	X	X	•	
Andres Technical Plating	1-521798	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	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	•	•	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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	•	•
Astech Engineered Products (3)	1-602005	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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. 2 Outside) (2)	Z-602004	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Auto-Chlor System of Washington, Inc.	1-511384	417.166	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•
Aviation Equipment Processing	1-071037	433.17(a)	•	•	•	•	•	•	X	•	X	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	X	•
Avid Bioservices, Inc.	1-571332	439.17, 439.27	•	•	•	•	•	•	•	•	•	•	•	•	•	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	•	•	X	•	•	•	•	•	•	•	•	X	•
BAZZ HOUSTON CO .	1-031010	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Beachcom, LLC	S-601841	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•
Beckman Coulter, Inc.	1-521824	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•
Bell Industries, Inc.	S-051294	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Beo-Mag Plating	1-511370	433.17(a)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	X	•	X	•	•	X	•
Beverage Visions LLC (Yorba Linda)	1-601449	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	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	•	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
Blower-Dempsey Corp. DBA Pacific Western Container	1-511371	403.5(d)	X	X	.	.	X	.	.	.	X	X	.	.	.	
Blue Lake Energy	1-521785	435.34(b)	X	X	.	.	.	X	.	
Blue Ribbon Container and Display, Inc.	1-601468	403.5(d)	X	.	X	X	X	.	.	
Bodycote Thermal Processing	1-031120	403.5(d)	X	
Boeing Company (Graham)	1-111018	433.17(a)	.	.	X	X	X	.
Brasstech, Inc	1-600316	433.17(a)	X
Brea Power II, LLC	1-521837	403.5(d)	X	.	.	.
Bridge Energy, LLC	1-600398	435.34(b)	X
Brindle/Thomas - Bradley	1-531428	435.34(b)	X
Brindle/Thomas - Brooks & Kohlbush	1-531429	435.34(b)	X	X
Brindle/Thomas - Catalina & Copeland	1-531430	435.34(b)	X	X
Brindle/Thomas - Dabney & Patton	1-531427	435.34(b)	X	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(f), 471.65(u), 471.65(w), 471.65(x)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	X	•	•
Brookfield SoCal Land Constructors LLC	S-601020	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Brothers International Desserts (North)	1-600583	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	
Brothers International Desserts (West)	1-600582	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	
Cadillac Plating, Inc.	1-021062	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	X	•	X	•	•	X	•	•	X	•	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
Color Fashion Dye and Finishing, LLC	1-602149	410.54	X
Colores Powder Coating	Z-601858	433.17(a)	X
Columbine Associates	1-521784	435.34(b)	X	X	X
Continuous Coating Corp.	1-601999	433.17(a), 465.15	X	.	.	X	X	.	.	.	X	.	X	X	X	.	.	X	.	X	
Corru-Kraft Buena Park	1-600806	403.5(d)	X	X
Corru-Kraft Fullerton	1-601450	403.5(d)	X	X	.	.
CP-Carrillo, Inc. (Armstrong)	1-600920	433.17(a)	X
Crest Coating, Inc.	1-021289	433.17(a)	X	.	.	X	X	X	X	X	.	.	X	.	X	.
Custom Enamellers, Inc.	1-021297	433.17(a)	X
Cytec Engineered Materials	Z-600005	433.17(a)	X	X	X	X
D.F. Stauffer Biscuit Co., Inc.	1-600414	403.5(d)	X
Dae Shin USA, Inc.	1-031102	410.56	X
Darling Ingredients, Inc.	1-511378	403.5(d)	X	X	.	X	.	X	.	X	.	X	.	X	X
Data Electronic Services, Inc.	1-011142	433.17(a)	.	.	X	.	X	.	.	X	X	.	.	X	.	X	X
Data Solder, Inc.	1-521761	433.17(a)	X	.	.	X	X	X	X	.	.	X	.	.	.
Dayton Flavors, Inc.	1-600038	403.5(d)	X
Defense Logistics Agency-Energy (DLA)	S-600944	403.5(d)	X
Diamond Environmental Services, LP	1-600244	403.5(d)	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
DNR Industries, Inc.	Z-601019	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•
Dr. Squatch Bricc City	1-602045	417.16, 417.76	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
DRS Network & Imaging Systems, LLC	1-531405	469.18(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	•	X	•	•	•
Ducommun Aerostructures, Inc.	1-021105	433.17(a)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	X	X	•	X	•	•
Dunham Metal Plating Inc.	1-601023	433.17(a)	•	•	•	•	X	X	•	X	X	•	•	•	•	•	•	X	•	•	X	•	•	X	•	•	X	•	X
Dunham Metal Processing	1-021325	433.17(a)	•	•	•	•	X	X	•	X	•	•	•	•	•	•	•	X	X	•	•	•	•	X	•	•	X	•	•
E&B Natural Resources- Angus Petroleum Corporation	1-600254	435.34(b)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
EFT Fast Quality Service, Inc.	1-011064	433.17(a)	X	•	X	•	X	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	•	X	•	•	X	•	•
Electro Metal Finishing Corporation	1-021158	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	X	X	X	•	X	•	•	•	•	•	X	•	•	X	X	•
Electrolurgy, Inc.	1-071162	433.17(a)	•	•	X	•	•	X	•	•	X	•	•	X	X	•	•	•	X	•	X	•	•	X	•	•	X	•	•
Electron Plating III, 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	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Embee Processing (Anodize)	1-600456	413.14(c), 413.54(c), 413.64(c), 433.17(a)	•	•	•	•	•	•	X	•	•	•	•	X	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•
Embee Processing (Plate)	1-600457	413.14(c), 413.54(c), 413.64(c), 413.74(c), 433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•
Emerald SoCal, LLC / Emerald Orange	1-601615	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	
Excello Circuits, Inc. (Hunter)	1-601356	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	
Expo Dyeing and Finishing, Inc.	1-031322	410.54	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	•	
Fabrication Concepts Corporation	1-011068	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	
Fineline Circuits & Technology, Inc.	1-021121	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	X	•	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
FujiFilm Irvine Scientific, Inc.	1-600977	439.47	X	
G&M Oil Company, Inc. (Magnolia)	S-602130	403.5(d)	X	
G&M OIL COMPANY, INC. - STATION #50	S-053293	403.5(d)	X	
Gallade Chemical, Inc.	1-011257	403.5(d)	X	.	X	X	.	.	
Gallade Chemical, Inc.	S-051243	403.5(d)	.	X	
Gemtech Coatings	Z-600544	433.17(a)	X	
Gemtech Coatings (Explorer)	1-601761	433.17(a)	X	
GKN Aerospace Transparency Systems	1-531401	403.5(d)	X	
Gold Coast Baking Company, Inc.	1-601700	403.5(d)	X	X	X	
Gold Coast Baking Company, LLC	1-602258	403.5(d)	X	X	X	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
ORANGE COUNTY SANITATION DISTRICT

Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
			Howmet Global Fastening Systems Inc.	1-021081	433.15(a), 433.17(a), 467.46, 471.35(dd), 471.35(ff), 471.35(l), 471.35(r), 471.35(t), 471.35(u), 471.35(v), 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(u), 471.65(w), 471.65(x)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	X	X	X	•	X	X	X	•
HSH Interplan USA, Inc.	1-602179	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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	
Hyatt Die Cast & Engineering Corporation	Z-331236	464.16(a), 464.16(b), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	X
Ideal Anodizing, Inc.	1-021041	433.17(a)	X	X	.	X	X	.	.	.	X	.	.
Ikon Powder Coating, Inc.	1-521756	433.17(a)	X
Image Technology, Inc.	1-521755	417.86	X	X	.	.	.	X	.	
Independent Forge Company	Z-601008	467.45	X	X	.	.	X	.	.	X	.	.	
Industrial Metal Finishing, Inc.	1-521828	403.5(d)	X	X	.	.	X	.	.	
Intec Products, Inc.	1-021399	410.46, 410.56	X	X	.	.	.	
International Paper Company (Anaheim)	1-521820	403.5(d)	X	.	X	X	X	.	.
International Paper Company (Buena Park Bag)	1-531419	403.5(d)	X	X	.	.
International Paper Company (Buena Park Container)	1-031171	403.5(d)	X	X	X	X	X	.	.	
Irvine Company Retail Properties	S-054311	403.5(d)	.	X
IsoTis OrthoBiologics, Inc.	1-601134	403.5(d)	X
ITT, LLC	S-051349	403.5(d)	.	X	X	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
Manufactured Packaging Products	1-521793	403.5(d)	X
Manufactured Packaging Products (MPP Fullerton)	1-021681	403.5(d)	X	X	X	.	X	X	.	X	.	.
Markland Manufacturing, Inc.	1-011046	433.17(a)	X	X	X	X	.	X	.	X	X	.	X	.	.	X	X	.	X	.	.
Maruchan, Inc. (Deere)	1-071024	403.5(d)	X	X	.	.
Maruchan, Inc. (Deere-South)	1-601021	403.5(d)	X	X	.	.
Maruchan, Inc. (Laguna Cyn)	1-141015	403.5(d)	X	X	.	X	.	.	.
Marukome USA, Inc.	1-141023	403.5(d)	X
Master Wash, Inc.	1-511399	403.5(d)	X	.	X	X	.	.	X
MBV-CA, LLC	1-602131	403.5(d)	X
MCP Foods, Inc.	1-021029	403.5(d)	X
MCP Foods, Inc. Dba DSM-Firmenich	1-602062	403.5(d)	X
Meggitt Orange County	1-601843	433.17(a)	X	X
Merical, LLC	1-600655	439.47	X	.	X	X	X	.	.	X	.	.
MeriCal, LLC	1-602025	439.47	X
Micrometals, Inc.	1-021153	471.105(e)	X	X
MTC Corp	1-600443	426.66	X
Murrietta Circuits	1-521811	433.17(a)	.	.	X	.	X	X	.	X	.	.	.
Nalco Water Pretreatment Solutions, LLC	1-521748	403.5(d)	X

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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	
Sanmina Corporation (Airway)	1-061008	433.17(a)	.	.	X	.	X	.	.	.	X	X	X	.	.
Sanmina Corporation (Redhill)	1-061009	433.17(a)	X	X	.	X	.	.	.	X	X	.	.
Santa Ana Country Club	2-562171	403.5(d)	X	
Santana Services	1-021016	433.17(a)	X	
Scientific Spray Finishes, Inc.	1-031311	433.17(a)	X	
Serrano Water District	1-021137	403.5(d)	X	X	X	.	.	.	
SFPP, LP	1-021619	403.5(d)	X	.	.	.	X	.	.	X	
Shepard Bros., Inc.	1-031034	417.166, 417.176	X	X	.	X	
Shur-Lok Company	1-600297	433.17(a)	X	
Shur-Lok Company	Z-602134	433.17(a)	X	
Simply Fresh, LLC	1-600709	403.5(d)	X	X	
Sioux Honey Association	1-602027	403.5(d)	X	
Sioux Honey Association	2-022654	403.5(d)	X	
Sirco Industrial, Inc.	1-600706	403.5(d)	X	X	X	X	X	.	
Soldermask, Inc.	1-031341	433.17(a)	X	X	
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3500 Ste A)	1-602000	433.17(a)	X	.	.	.	
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3506 Ste A)	1-602001	433.17(a)	X	.	X	X	.	.	X	X	.	.	

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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	
South Coast Circuits LLC DBA Summit Interconnect Santa Ana (Bldg 3524 Ste A)	1-602003	433.17(a)	•	•	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	X	•	•
South Coast Circuits, Inc. (Bldg 3500 Ste A)	1-601444	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	433.17(a)	•	•	•	•	X	•	•	X	X	•	•	•	•	•	X	X	•	•	•	•	•	•	•	•	X	X	•	•
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	433.17(a)	•	X	•	•	•	•	•	•	•	•	•	•	X	•	•	X	X	•	•	•	•	X	•	•	X	•	•	
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	433.17(a)	•	•	•	•	•	•	•	X	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•	X	X	•	•	
Southern California Edison #1 (MT)	1-031014	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Southern California Edison #2 (DAS)	1-031015	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Southern California Edison #3 (LARS)	1-031016	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Space Back Bay, LLC	S-601857	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	

SPS Technologies LLC, DBA Cherry Aerospace	1-511381	433.17(a), 467.16, 467.36(c), 467.46, 471.35(a), 471.35(ee), 471.35(ff), 471.35(g), 471.35(i), 471.35(j), 471.35(l), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(a), 471.65(d), 471.65(f), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	•	•	X	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Stainless Micro-Polish, Inc.	1-021672	433.17(a)	•	•	•	•	X	•	•	•	X	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Star Powder Coating, Inc.	1-531425	433.17(a)	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Statek Corporation (Main)	1-021664	433.17(a), 469.26(a)	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Statek Corporation (Orange Grove)	1-521777	469.28(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2023/24
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
Stepan Company	1-021674	417.106, 417.146, 417.166	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	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	X
Sunny Delight Beverages Co.	1-021045	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	X	•	•	•
Superior Connector Plating, Inc.	1-021090	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	X	•	•	X	•	X	X	X	•
Superior Processing (2)	1-601701	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	X	•	X	•	X	•	•	•	•	•	X	•	•	•	•	•
Tawa Services, Inc. (Bakery Central Kitchen)	1-601895	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Tawa Services, Inc. (Food and Meat Processing Center)	1-601896	432.126, 432.56	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Tayco Engineering, Inc.	1-031012	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	X	X	•
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Terra Universal, Inc.	1-601407	433.17(a)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
The Irvine Company LLC dba California Recreation Company	S-601993	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•
Thermal-Vac Technology, Inc.	1-021282	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	X	X	•	•	•	•	•	•	•	•	•



18480 Bandilier Circle
Fountain Valley, California 92708-7018
714.962.2411

www.ocsan.gov