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SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY

BOARD OF DIRECTORS MEETING AGENDA

**JANUARY 3, 2024
8:00 A.M.**

**ADMINISTRATION BUILDING
1500 SOUTHSIDE DRIVE
GILROY, CA 95020**

CHAIR:

Rene Spring, Morgan Hill

VICE CHAIR:

Dion Bracco, Gilroy

BOARD MEMBERS:

Marie Blankley, Gilroy

Fred M. Tovar, M.Ed., Gilroy

Yvonne Martinez Beltran, Morgan Hill

SECRETARY:

Saeid Vaziry, P.E.

SCRWA MANAGER:

Jimmy Forbis, Gilroy

COMMENTS BY THE PUBLIC WILL BE TAKEN ON ANY AGENDA ITEM BEFORE ACTION IS TAKEN BY THE SCRWA BOARD OF DIRECTORS. Persons speaking on any matter are asked to state their name and address for the record. Public testimony is subject to reasonable regulations, including but not limited to time restrictions on particular issues and for each individual speaker.

All matters listed under Consent Calendar are considered by Board of Directors to be routine and will be enacted by a single motion. There will be no separate discussion of these items unless a request is made by a member of the public, a Board Member or Staff prior to the time the Board votes on the motion to adopt.

Persons who wish to speak on matters set for PUBLIC HEARING will be heard when the presiding officer calls for comments from those persons who are in support of or in opposition thereto. After persons have spoken, the hearing is closed and brought to Board level for discussion and action. There is no further comment permitted from the audience unless requested by the Board.

In compliance with the Americans with Disabilities Act, SCRWA will make reasonable arrangements to ensure accessibility to this meeting. If you need special assistance to participate in this meeting, please contact the Secretary to the Joint Powers Authority at (408) 848-0480 at least 48 hours prior to the hearing for accommodations. Please ask for assistance at the Secretary's desk PRIOR to the start of the meeting or during a break in the meeting.

If you challenge any planning or land use decision made at this meeting in court, you may be limited to raising only those issues you or someone else raised at the public hearing held at this meeting, or in written correspondence delivered to the Board of Directors at, or prior to, the public hearing.

A Closed Session may be called during this meeting pursuant to Government Code Section 54956.9(b)(1) if a point has been reached where, in the opinion of the legislative body of the Joint Powers Authority on the advice of its legal counsel, based on existing facts and circumstances, there is a significant exposure to litigation against the Joint Powers Authority.

Meeting Schedule: The Joint Powers Authority meets regularly on the first Wednesday of each quarter, at 8:00 a.m. If a holiday should fall on the regular meeting date, the meeting will be rescheduled to the following Wednesday.

Wednesday, January 3, 2024, 8:00 A.M.

I. Call to Order

- A. Certification of Posting of the Agenda
- B. Roll Call
- II. **Consent Calendar (by Motion)**
 - A. Approval of Minutes of the October 4, 2023 meeting (copies)
- III. **Presentation by Members of the Public on Items not on the Agenda**
- IV. **Bids and Proposals**
- V. **Old Business**
- VI. **New Business**
 - A. Review of Updates to Pretreatment Program and Introduction of an Ordinance of the SCRWA Amending Existing Sewer Use Ordinance 2013-01 to Include Required and Recommended Actions of 2020 Pretreatment Compliance Audit – Including Regulations for Industrial Users and Setting Uniform Requirements for Discharge into the Wastewater Collection and Treatment System
 - 1. Staff Report: Jonathan Crick, Pretreatment Program Manager (copies)
 - 2. Open Public Hearing
 - 3. Close Public Hearing
 - 4. Possible Action:
 - a) Motion to read the ordinance by title only and waive the reading of the ordinance; and
 - b) Introduce an ordinance of the Board of SCRWA amending Sewer Use Ordinance to improve Authority's Pretreatment Program; and
 - c) Update the Enforcement Response Plan to currently accepted best practices.
 - B. Re-adoption of Investment Policy (copies)
- VII. **Communications**
 - A. Cash and Investment Report as of September 30, 2023 (copies)
- VIII. **Report**
 - A. Jacobs
 - 1. Wastewater Acronyms (copies)
 - 2. Plant Reports – September, October, and November 2023 (copies)
 - 3. Recap of Expenses – September, October, and November 2023 (copies)
 - 4. Septage Report – September, October, and November 2023 (copies)
 - A. Valley Water
 - B. Stantec
 - 1. Engineering Projects Report – January 2024 (copies)
 - C. SCRWA Manager
 - D. SCRWA Attorney
 - E. Board Members
- IX. **Adjourn**



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**SOUTH COUNTY REGIONAL
WASTEWATER AUTHORITY**

**BOARD OF DIRECTORS
MEETING MINUTES**

OCTOBER 4, 2023

CHAIR:
Rene Spring, Morgan Hill

VICE CHAIR:
Dion Bracco, Gilroy

BOARD MEMBERS:
Marie Blankley, Gilroy
Yvonne Martinez Beltran, Morgan Hill
Fred M. Tovar, M.Ed., Gilroy

SECRETARY:
Saeid Vaziry, P.E.

SCRWA MANAGER:
Jimmy Forbis, Gilroy

MEMBERS PRESENT:

Rene Spring
Dion Bracco
Marie Blankley
Yvonne Martinez Beltran
Fred Tovar

STAFF PRESENT:

Gilroy
Jimmy Forbis
Saeid Vaziry
Harjot Sangha

Morgan Hill
Dat Nguyen

VALLEY WATER:

John Varela
Richard Santos
Kirsten Struve
Hossein Ashktorab

I. **Call to Order**

Chairman Spring called the meeting to order at 8:00 A.M.

A. Certification of posting of the agenda

Kerry Edmonds reported the agenda was posted on September 28, 2023 @ 11:15 A.M.

B. Roll Call

All members were present

II. **Consent Calendar**

A. Approval of minutes for the June 7, 2023 meeting

Motion to approve Consent Calendar moved by Director Blankley seconded by Director Martinez Beltran.

Ayes: Spring, Bracco, Blankley, Martinez Beltran, Tovar

Nays 0, Abstain: 0

Vote: Motion Carried

III. **Presentation by members of the public on items not on the agenda**

None

IV. **Bids and Proposals**

None

V. **Old Business**

None

VI. **New Business**

A. Jimmy Forbis presented a brief report to amend SCRWA Bylaws, changing the date of the regular July meetings of the Board to June.

Motion to amend the SCRWA Bylaws Section 3.01 Changing of the Regular Meetings of the Board and Adoption by Roll Call Vote of Resolution 2023-02 moved by Director Blankley, seconded by Director Martinez Beltran.

Ayes: Spring, Bracco, Blankley, Martinez Beltran, Tovar

Nays 0, Abstain: 0

Vote: Motion Carried

Attachment: Email to the Board from Andrew Faber, September 29, 2023

VII.

Communications

- A. Cash and Investment Report as of June 30, 2023

Harjot Sangha presented the Cash and Investment Report as of June 30, 2023

VIII.

Reports

- A. Jacobs

John Edgar reported there were no instances this past quarter. Recently held a Golf Tournament, honoring Jesus Luna, raised over \$10,000 for First Tee Silicon Valley, restricted funds to South County.

Introduction of Lauren Mancuso, Jacobs Operations Director for California.

- B. Valley Water

Director Varela reported Valley Water is in South County. Spoke on the importance of recycled water and purification for sustainable water for our future. Will be celebrating a ribbon cutting of the purple pipe recycled water project today.

- C. Stantec

Saeid Vaziry presented the engineering projects report, to include the Treatment Capacity Expansion Project, NPDES/WDR Permit Renewal and Recycled Water System Support.

- D. SCRWA Manager

Nothing to report.

- E. SCRWA Attorney

Nothing to report.

- F. Board Members

None

Adjourn

Chairman Spring adjourned the meeting at 8:22 A.M.



Kerry Edmonds, Deputy Secretary of the Board
South County Regional Wastewater Authority



**SOUTH COUNTY REGIONAL
WASTEWATER AUTHORITY**

1500 Southside Drive
Gilroy, California 95020-7042
Telephone (408) 848-0480
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DATE: January 3, 2024

TO: Honorable Chairman Spring and Members of the Board

FROM: Jimmy Forbis, Authority Manager

BY: Saeid Vaziry, Senior Environmental Engineer
Jonathan Crick, Deputy Fire Marshal and Pretreatment Program Manager

SUBJECT: **Review of Updates to Pretreatment Program and Introduction of an Ordinance of the South County Regional Wastewater Authority Amending Existing Sewer Use Ordinance 2013-01, to Include Required Actions of 2020 Pretreatment Compliance Audit to Improve Authority's Pretreatment Program – Including Regulations for Industrial Users and Setting Uniform Requirements for Discharge into the Wastewater Collection and Treatment System**

Recommendation

1. Motion to read the ordinance by title only and waive further reading of the ordinance; and
2. Introduce an ordinance of the South County Regional Wastewater Authority (SCRWA) amending existing Sewer Use Ordinance 2013-01 relating to the Pretreatment Program for industrial discharges.
3. Update the Enforcement Response Plan to currently accepted best practices.

Executive Summary

The SCRWA's Wastewater Discharge Permit, issued by the Central Coast Regional Water Quality Control Board (CCRWQCB) along with U.S. Environmental Protection Agency (U.S. EPA) and State Water Resources Control Board, requires that SCRWA have a Pretreatment Program. The Pretreatment Program functions are dictated by a Pretreatment Program Plan which is approved by the CCRWQCB and is mandatory to meet the requirements of the U.S. EPA.

The Pretreatment Program uses the Sewer Use Ordinance (SUO) as its legal authority to implement the local waste discharge requirements. For a brief history, SCRWA adopted Ordinance 93-1 in 1993, and subsequently amended the local limits in 2000 and 2013 with Ordinances 2000-01 and 2013-01, respectively. The SUO protects the SCRWA Facility (Plant) from harmful materials, conditions and pollutants that could: 1) harm the Plant and employees, 2) harm the collection system (i.e., plumbing pipes, pumps, etc.), and 3) cause the Plant to have an upset or violate its waste discharge permit.

The Pretreatment Program compliance audit was performed in 2020. The audit report contains required and recommended actions to improve the Authority's Pretreatment Program. In addition, the report includes improving the SUO and Enforcement Response Plan (ERP). The SCRWA is required to make the necessary revisions to the Pretreatment Program and update its SUO and ERP.

Background

SCRWA operates a Wastewater Discharge Pretreatment Program that regulates industrial wastewater discharges at the source (i.e., control sources of pollution from the businesses). This is a cooperative effort of federal, state, and local regulatory environmental agencies established to protect water quality. The Pretreatment Program is administrated through the Clean Water Act, which called for the U.S. EPA to develop national pretreatment standards to control industrial discharges into sewerage systems.

The objectives of the local program are:

1. To protect our municipal sewer system and wastewater treatment facility from pollutants that may interfere with Plant operations or pass through the Plant untreated; and
2. To improve opportunities for the Plant to reuse treated wastewater and the biosolids that are generated.

The Pretreatment Program applies to all industrial wastewater dischargers. Discharge from industrial wastewater dischargers is controlled through a wastewater discharge permit, which is issued by Pretreatment Program staff.

The Pretreatment Program's management and staffing have been provided by the Gilroy Deputy Fire Marshal using the Gilroy Pretreatment Program Inspection staff. The program staff inspects businesses in both Gilroy and Morgan Hill for compliance with the SUO, issues permits to facilities, conducts sampling of both businesses and the Plant, carries out investigations, pursues enforcement as needed, conducts public education and information programs, and responds to spills and discharges of pollutants, hazardous wastes, and hazardous materials.

The Pretreatment Program is periodically audited by the CCRWQCB on behalf of the U.S. EPA. The audit report also provided comments on the SCRWA's SUO and ERP, and it contains required actions that can improve the Pretreatment Program. As a part of these audits, the staff was notified that certain elements of the SUO require modifications to be in accordance with changes or updates in the Federal and State regulations. The modifications are intended to make the SUO meet these requirements. The changes will not affect the current administration or operations of the Pretreatment Program, and they clarify certain details and definitions to make the local ordinance consistent with the language of the Federal Model SUO and Federal Code of Regulations.

The following supporting documents have been included with this staff report:

- 1) Sewer Use Ordinance 2024-01
- 2) State Water Resources Control Board acceptance letter dated December 13, 2023
- 3) Sewer Use Ordinance Audit Findings and Responses

- 4) Enforcement Response Plan
- 5) Local Limits Report

All amendments were based on the auditors' written report. The Pretreatment Program is required to make these necessary revisions.

Analysis

The State Water Resources Control Board conducts periodic audits of pretreatment programs. These audits require that the pretreatment program address the findings in the report, which the SCRWA Pretreatment Program has done as evidenced by the December 13, 2023, letter from the State Water Resources Control Board (Attachment 2).

The short summary of activities that the SCRWA Pretreatment Program has conducted and completed are:

- 1) Extensive wastewater sampling including analytical chemistry data reports.
- 2) Evaluate the data and use best engineering practices to revise the local limits using technically-based calculation methods, as applicable (Attachment 5, Local Limits Report).
- 3) Revise the SUO and ERP to agree with current codes, regulations, standards, and practices (Attachment 3, Audit Findings and Responses).

An intentional effort has been made to meet all the requirements of the findings, without making drastic and broad-sweeping changes to the Pretreatment Program. The purposes of minimizing the changes are as follows:

- 1) Drastic changes to the Pretreatment Program could cause unforeseen consequences which may affect the regulated community (e.g., businesses) and Plant staff and Pretreatment Program staff.
- 2) The existing SUO and local limits have demonstrated to be generally protective of the collection systems, wastewater treatment plant, sludge quality, and wastewater effluent quality. The local limits study and evaluation confirmed this and did reveal a few parameters which would need to be updated. These updates were minimized and declared as a "non- substantial modification" by the State Water Resources Control Board.

By having these changes declared as a "non-substantial modification," this removes the regulatory burden of the State Water Resources Control Board and allows SCRWA to proceed without further oversight from them for the approval of these specific documents (i.e., the SUO and ERP). A quick comparison of the Table of Contents for both the old and new ordinances will reveal that the section titles and subsection topics to be very similar. The ERP has been updated to meet the currently accepted best practices. Previous Pretreatment Program Managers had used the Hazardous Materials (a.k.a. CUPA Program), Enforcement Plan and although the programs are similar, they are separate and distinct programs; therefore, the updated ERP has been written specifically for the Pretreatment Program.

Attachment 3 includes "IV. Findings Summary Table" and a Checklist from the audit. Within Attachment 3, is the expanded list of correction items. Most findings require the expansion or addition of a definition or section to the ordinance per yellow highlights.

Below is a table of changes for the Local Limits. The table compares the old local limit to the new local limit. The orange highlight indicates no changes. The green highlight indicates a change.

Parameter	Old Daily Maximum (mg/l)	New Daily Maximum (mg/l)
Arsenic (As)	1.1	0.88
BOD	1000	610
Cadmium (Cd)	0.01	0.01
Chloride	N/A	2,900
Chromium (Cr)	5.1	5.1
Copper (Cu)	1.8	1.8
Cyanide (CN)	1.8	1.8
Lead (Pb)	1.6	0.5
Mercury (Hg)	0.03	0.03
Nickel (Ni)	2.7	2.7
Silver (Ag)	4.2	4.2
Sodium	N/A	2,500
Total dissolved solids	N/A	9,500
Total suspended solids	1,000	1,000
Zinc (Zn)	1.4	1.4
Oil and Grease (petroleum)	100	100

Public Outreach

Public outreach efforts were conducted regarding the proposed amendment. The outreach activities included:

- Publicly posted agenda for the January 3, 2024, SCRWA Board Regular Meeting.
- Cities' Websites: The proposed amendment was posted on the City's official website, accessible to the public.
- All Significant Industrial Users were notified of the proposed amendment.

Alternatives

Board may modify or reject the proposed amendments to the Ordinance and updates to the ERP. Rejection of the amendments to the Ordinance and updates to the ERP is not recommended, as the proposed Ordinance and updated ERP were constructed from feedback from federal, state, and local regulatory environmental agencies established to protect water quality, and such action would adversely affect the Plant's operations permit.

Next Steps

If Board approves the amendments and introduces the proposed Ordinance and the updated ERP at this meeting, the Board will need to adopt it at its regular meeting on April 3, 2024. The Ordinance and ERP would go into effect 30 days after adoption.

Fiscal Impact

There is no fiscal impact associated with this item.

Attachments:

- 1) Sewer Use Ordinance 2024-01
- 2) State Water Resources Control Board acceptance letter dated December 13, 2023
- 3) Sewer Use Ordinance Audit Findings and Responses
- 4) Enforcement Response Plan
- 5) Local Limits Report

Attachment 1

SCRWA Sewer Use Ordinance

ORDINANCE NO. 2024-01

AN ORDINANCE OF THE SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY AMENDING THE EXISTING ORDINANCE 2013-01 TO REGULATE SEWER USE AND SET UNIFORM REQUIREMENTS FOR DISCHARGE INTO THE WASTEWATER COLLECTION AND TREATMENT SYSTEM

WHEREAS, the South County Regional Wastewater Authority (Authority) is required to adopt a sewer use ordinance to protect the South County Regional Wastewater Treatment Plant (Plant); and

WHEREAS, sewer use ordinance 93-1 local limits were amended with Ordinance 2000-01; and

WHEREAS, the sewer use ordinance 2013-01 was adopted with amendments per direction from the Regional Water Quality Control Board; and

WHEREAS, the existing sewer use ordinance 2013-01 provides the legal authority to set uniform requirements for discharges into the wastewater collection and treatment system; and

WHEREAS, the United States Environmental Protection Agency (USEPA) has promulgated new rules pertaining to requirements of sewer use ordinances; and

WHEREAS, the adoption of these rules will ensure the continued compliance of the Plant with its National Pollutant Discharge Elimination System (NPDES) Permit and Federal Law; and

NOW, THEREFORE, THE SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY DOES HEREBY ORDAIN AS FOLLOWS:

SECTION A

This ordinance may be called the "Pretreatment and Sewer Use Ordinance #2024-01".

SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY

PRETREATMENT AND SEWER USE ORDINANCE #2024-01

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Confidential Information

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SECTION 1 GENERAL PROVISIONS

SECTION 1.1 AUTHORITY

This ordinance shall apply to all industrial users and other users subject to wastewater discharge permits of the South County Regional Wastewater Treatment Plant (Plant). The ordinance authorizes the issuance of wastewater discharge permits; authorizes monitoring, compliance, and enforcement activities; establishes administrative review procedures; requires industrial reporting; and provides for the settling of fees for the equitable distribution of costs resulting from the program established herein. This ordinance authorizes the South County Regional Wastewater Authority (Authority) to administer the pretreatment program, to enforce its Enforcement Response Plan, and to apply applicable civil and criminal penalties in its wastewater discharge permits as required by 40 CFR Part 403.8(f)(1)(vi).

SECTION 1.2 PURPOSE AND POLICY

This ordinance sets uniform requirements for discharges into the sanitary sewer system and Plant and enables the Authority to comply with the administrative and waste quality requirements of the Clean Water Act, the water quality requirements set by the Central Coast Regional Water Quality Control Board (Central Coast Water Board), the applicable effluent limitations, national standards of performance, toxic and pretreatment effluent standards, and any other discharge criteria which are required or authorized by state or federal law, and to derive the maximum public benefit by regulating the quality of wastewater discharged into those systems.

The objectives of this ordinance to comply with the Clean Water Act are:

- A. To prevent the introduction of pollutants into the Plant and sanitary sewer system that will interfere with the operation of the system or contaminate the resulting sludge;
- B. To prevent the introduction of pollutants into the Plant which will pass through the system, inadequately treated; into receiving waters or the atmosphere or otherwise be incompatible with the system;
- C. To improve the opportunity to recycle and reclaim wastewaters and sludges from the system;
- D. To protect the Plant, sanitary sewer system, and pretreatment personnel who may be affected by wastewater and sludge in the course of their employment, and to protect the general public; and
- E. To enable the Plant to comply with its National Pollutant Discharge Elimination System (NPDES) permit conditions, sludge use and disposal requirements and any other federal or state laws to which the Plant is subject.

SECTION 1.3 ADMINISTRATION AND ENFORCEMENT

The Authority Manager or designee shall enforce the provisions of this ordinance, and for such purposes shall have the powers of a peace officer. Such powers shall not limit or otherwise affect the powers and duties of other Authority officials. Any powers granted to or duties imposed upon Authority Manager may be delegated by the Authority Manager to a duly authorized employee.

SECTION 1.4 DEFINITIONS

Unless a provision explicitly states otherwise, the following terms and phrases, as used in this ordinance, shall have the meanings hereinafter designated.

- A. Act or the Act: The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 USC 1251 et seq.
- B. Approval Authority: Regional Water Quality Control Board, Central Coast Region, San Luis Obispo, CA.
- C. Authority: South County Regional Wastewater Authority, its officers, directors, designees, or agents.
- D. Authority Manager: The Manager of the Authority or a designated representative.
- E. Authorized or Duly Authorized Representative of the User: An authorized representative of a user may be:
 - (1) If the user is a corporation:
 - (a) The president, secretary, treasurer, or a vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - (b) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) If the user is a partnership or sole proprietorship: a general partner or proprietor, respectively.
 - (3) If the user is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
 - (4) The individuals described in paragraphs (1) through (3), above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the Authority.
- F. Beneficial Uses: Uses of the Waters of the State that may be protected against quality degradation include, but are not necessarily limited to: domestic, municipal, agricultural and industrial supply power generation, recreation, aesthetic enjoyment,

navigation and preservation and enhancement of fish, wildlife, and other aquatic resources or reserves, and other uses, both tangible or intangible as specified by Federal or State Law.

- G. Best Management Practices (BMPs): The schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Sections 2.1, 2.2, and 2.3 of this ordinance. BMPs include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.
- H. Biochemical Oxygen Demand (BOD): The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure for five (5) days at 20° centigrade expressed as a concentration (e.g., milligrams per liter [mg/l]).
- I. Building Sewer: A lateral sewer conveying wastewater from the premises of the user to the public sanitary sewer system.
- J. Categorical Pretreatment Standards or Categorical Standards: Any regulation containing pollutant discharge limits promulgated by USEPA in accordance with section 307(b) and (c) of the Clean Water Act (33 U.S.C. section 1317) that apply to a specific category of users and that appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.
- K. Color: The optical density at the visual wavelength of maximum absorption relative to distilled water. One hundred percent (100%) transmittance is equivalent to zero (0.0) optical density.
- L. Composite Sample: A sample resulting from the combination of individual wastewater samples taken at selected intervals based on an increment of either flow or time.
- M. Cooling Water: The water discharge from any uses, such as air conditioning, cooling, or refrigeration, or to which the only pollutant added is heat.
- N. Commercial or Industrial Sewage: Any and all liquids and/or solids contained within liquids from industrial, commercial, or institutional processes, except liquid borne wastes derived from ordinary living processes, and of such character as to permit satisfactory disposal, without special treatment, into the sanitary sewer system.
- O. Control Authority: The term "Control Authority" shall refer to the South County Regional Wastewater Authority or the Authority Manager or the Authority Manager's designee.
- P. Daily Maximum: The arithmetic average of all effluent samples for a pollutant collected during a calendar day.
- Q. Daily Maximum Limit: The maximum allowable discharge limit of a pollutant during a calendar day. Where daily maximum limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- R. Effluent: Shall mean the liquid outflow of any facility designed to treat, convey, or retain wastewater.

- S. Environmental Protection Agency (USEPA): The United States Environmental Protection Agency, or where appropriate, the term may also be used as a designation for the administrator or other duly authorized official of said agency.
- T. Existing Source: Any source of discharge, the construction or operation of which commenced prior to the publication of proposed categorical pretreatment standards which will be applicable to such source if the standard is thereafter promulgated in accordance with Section 307 of the Act (33 U.S.C. section 1317).
- U. Grab Sample: A sample which is taken from a wastestream on a one-time basis with no regard to the flow in the wastestream and without consideration of time or strength and over a period of time not to exceed fifteen (15) minutes).
- V. Health Officer: The Santa Clara County health officer, his/her assistants, or authorized deputies.
- W. Holding Tank Waste: Any waste from holding tanks such as vessels, chemical toilets, campers, trailers, boats, septic tanks, and vacuum pump tank trucks.
- X. Indirect Discharge: The discharge or the introduction of non-domestic pollutants from any source regulated under section 307(b) and (c) or (d) by the Act, into the Plant (including holding tank waste discharged into the system).
- Y. Industrial User: Any contributor of industrial waste or wastewater or a source of indirect discharge.
- Z. Industrial Waste or Wastewater: Any non-domestic liquid or solid wastes from any commercial, industrial, or institutional establishment. Industrial waste is distinct from sanitary or domestic waste.
- AA. Inspector: Inspector means the authorized inspector or representative of the Authority Manager.
- BB. Instantaneous Maximum Allowable Discharge Limit: The maximum concentration (or loading) of a pollutant allowed to be discharged at anytime, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
- CC. Interceptor: A device or trap to prevent the amount of grease, sand, oil or other solids or semi-solids from entering the sewer system.
- DD. Interference: A discharge that, alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the Plant, its treatment processes or operations, or its sludge processes, use or disposal which is a cause of or significantly contributes to either a violation of any requirements of the Plant's NPDES permit (including an increase in the magnitude or duration of a violation) or to the prevention of sewage sludge use or disposal by the Plant in accordance with the following statutory provisions and regulations or permits issued under the Solid Waste Disposal Act (SWDA), including Title II, more commonly, referred to a Resource Conservation and Recovery Act (RCRA) and including State regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA, the Clean Air Act, the Toxic Substances Control Act (TSCA), and the Marine Protection, Research, and Sanctuaries Act.
- EE. Local Limit: Specific discharge limits developed and enforced by the Authority upon

industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR Part 403.5(a)(1) and (b).

FF. Medical Waste: Isolation wastes, infectious agents, human blood and blood byproducts, pathological wastes, sharps, body parts, fomites, etiological agents, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.

GG. Member Agency: Either or both of the Cities of Gilroy or Morgan Hill, whose joint exercise of Powers agreement created the Authority.

HH. National Pollutant Discharge Elimination System (NPDES) permit: A permit issued to the Authority pursuant to section 402 of the Act that regulates operations of the Plant and discharge of treated effluent to Waters of the United States.

II. New Source:

(1) Any building, structure facility, or installation from which there is (or may be) a discharge of pollutants, the construction of which commenced after the publication of proposed pretreatment standards under section 307(c) of the Act that will be applicable to such source if such standards are thereafter promulgated in accordance with that section, provided that:

- (a) The building, structure, facility, or installation is constructed at a site at which no other source is located; or
- (b) The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
- (c) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source, shall be considered.

(2) Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, or facility, or installation meeting the criteria of section (1)(b) or (c) above but otherwise alters, replaces, or adds to existing process or production equipment.

(3) Construction of a new source as defined under this paragraph has commenced if the owner or operator has:

- (a) Begun, or caused to being, as part of a continuous onsite construction program
 - (i) Any placement, assembly, or installation of facilities or equipment; or
 - (ii) Significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

(b) Entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

- JJ. Noncontact Cooling Water: Water used for cooling which does not come into direct contact with any raw material, intermediate product, waste product, or finished product.
- KK. Pass Through: A discharge which exits the Plant in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the Authority's NPDES permit, including an increase in the magnitude or duration of a violation.
- LL. Permittee: The person to whom a wastewater discharge permit has been issued pursuant to this ordinance.
- MM. Person: An individual, firm, partnership, or corporation, and their heirs, assigns or agents.
- NN. pH: The scale of 1 to 14 that measures acidity and alkalinity; 7.0 being neutral, 0-6.9 being acidic, and 7.1-14 being basic or alkaline. Technically, it is the logarithm (base 10) of the reciprocal of the concentration of hydrogen ions in standard units.
- OO. Point of Discharge: The point at which any private sewer joins the sanitary sewer system.
- PP. Pollutant: Any dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, industrial wastes, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, cellar dirt, agricultural and industrial wastes, and the characteristics of wastewater (i.e. pH, temperature, total suspended solids [TSS], turbidity, color, BOD, Chemical Oxygen Demand [COD], toxicity, odor).
- QQ. Pretreatment: The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutants' properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into a publicly owned treatment works (POTW). The reduction or alteration can be obtained by physical, chemical, or biological processes, process changes, or other means, except by diluting the concentration of the pollutants unless allowed by an applicable pretreatment standard.
- RR. Pretreatment Requirements: Any substantive or procedural requirement related to pretreatment, other than a pretreatment standard imposed on a user.
- SS. Pretreatment Standard: Prohibited discharge standards, categorical pretreatment standards, and local limits
- TT. Publicly Owned Treatment Works (POTW): A treatment works, as defined by section 212 of the Act (33 U.S.C. section 1292), which is owned by a municipality (as defined by section 502(4) of the Act). A POTW includes any devices and systems used in the storage, treatment, recycling, and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if

they convey wastewater to a treatment plant. The term also means the municipality as defined in section 502(4) of the Act, which has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

UU. Reclaimed Water: Water which, as a result of treatment of waste, is suitable for direct beneficial use or a controlled use that would not otherwise occur.

VV. Sanitary Sewer: A main line sewer for the acceptance of any sewage or liquid waste, except storm water, surface water, ground water, roof runoff, or other unpolluted water.

WW. Septic Tank Waste: Any sewage from holding tanks, such as vessels, chemical toilets, campers, trailers, and septic tanks.

XX. Sewage: All water, or a combination of liquid or water containing human waste, conducted away from residences, business buildings, and institutions, which is known as domestic or sanitary sewage, together with the liquid or water carried waste resulting from a manufacturing process employed in commercial or industrial establishments including washing, cleaning, or drain water from such processes, which is known as industrial waste.

YY. Shall: Is mandatory. *May* is permissive.

ZZ. Significant Industrial User (SIU): Except as provided in paragraphs (3) and (4) below, an SIU is:

- (1) An industrial user subject to categorical pretreatment standards; or
- (2) Any industrial user that:
 - (a) Discharges an average of ten thousand (10,000) gallons per average workday or more of process wastewater to the Authority's wastewater treatment system (excluding sanitary, noncontact cooling and boiler blowdown wastewater); or
 - (b) Contributes a process wastestream which makes up five (5) percent or more of the average dry weather hydraulic capacity of the Plant; or
 - (c) Is designated as such by the Authority on the basis that it has reasonable potential for adversely affecting the Plant's operation or for violating any pretreatment standard or requirement.
- (3) The Authority may determine that an industrial user subject to categorical pretreatment standards is a Non-Significant Categorical Industrial User (NSCIU) rather than an SIU on a finding that the industrial user never discharges more than one hundred (100) gpd of total categorical wastewater (excluding sanitary, noncontact cooling, and boiler blowdown wastewater), unless specifically included in the pretreatment standard) and the following conditions are met:
 - (a) The industrial user, prior to the Authority's finding, has consistently complied with all applicable categorical pretreatment standards and requirements;
 - (b) The industrial user annually submits the certification statement required in Section 5.14(B) together with any additional information necessary to support the certification statement; and
 - (c) The industrial user never discharges any untreated concentrated wastewater.

- (4) Upon a finding that a user meeting the criteria in subsection (2) above has no reasonable potential for adversely affecting the Plant's operation or for violating any pretreatment standard or requirement, the Authority may at any time on its own initiative or in response to a petition received from an industrial user, and in accordance with procedures in 40 CFR Part 403.8(f)(6), determine that such user should not be considered an SIU.

AAA. Significant Noncompliance (SNC): SNC is a condition where a user may have any of the following conditions:

- (1) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter during a six- (6-) month period exceeded (by any magnitude) a numeric pretreatment standard or requirement, including instantaneous limits as defined in Section 1.4(BB);
- (2) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six- (6-) month period equals or exceeds the product of the numeric pretreatment standard or requirement including instantaneous limits, as defined in Section 1.4(BB), multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils, and grease, and 1.2 for all other pollutants except pH);
- (3) Any other violation of a pretreatment standard or requirement as defined in Section 2 that the Authority 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;
- (4) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Authority's exercise of its emergency authority to halt or prevent such a discharge;
- (5) Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- (6) Failure to provide within forty-five (45) days after the due date, any required reports, including baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- (7) Failure to accurately report noncompliance; or
- (8) Any other violation(s), which may include violation of BMPs, which the Authority determines will adversely affect the operation or implementation of the Pretreatment Program.

BBB. Slug Load or Slug Discharge: Any discharge at a flow rate or concentration which could cause a violation of the prohibited discharge standards in Section 2.1 of this ordinance. A slug discharge is any discharge of a non-routine, episodic nature, including, but not limited to, an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate

the Authority's regulations, local limits, or NPDES permit conditions. CCC. Standard Industrial Classification (SIC) Code: A classification pursuant to the Standard Industrial Classification Manual issued by the U.S. Office of Management and Budget. DDD. Storm Water: Any flow occurring during or following any form of natural precipitation and resulting from such precipitation including snowmelt.

EEE. Total Dissolved Solids (TDS): Matter dissolved in water that will pass through a filter.

FFF. Total Suspended Solids (TSS): The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquids, and which is removable by laboratory filtering.

GGG. User: A source of indirect discharge.

HHH. Wastewater: The liquid portion of industrial or domestic wastes from dwellings, commercial buildings, industrial facilities, and institutions, which may be present, whether treated or untreated, which is contributed into or permitted to enter the POTW.

III. Waters of the State: All streams, lakes, ponds, marshes, water courses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface, or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the State or any portion thereof.

SECTION 1.5 ABBREVIATIONS

<u>BOD</u>	Biochemical Oxygen Demand
<u>CFR</u>	Code of Federal Regulations
<u>COD</u>	Chemical Oxygen Demand
<u>gpd</u>	Gallons Per Day
<u>l</u>	Liter
<u>LEL</u>	Lowest Explosive Limit
<u>mg</u>	Milligrams
<u>mgd</u>	Million Gallons Per Day
<u>mg/l</u>	Milligrams Per Liter
<u>NIOSH</u>	National Institute of Occupational Safety and Health
<u>NPDES</u>	National Pollutant Discharge Elimination System <u>O&M</u>
Operation and Maintenance	
<u>pH</u>	Hydrogen Ion Concentration
<u>POTW</u>	Publicly Owned Treatment Works
<u>RCRA</u>	Resource Conservation Recovery Act
<u>SIC</u>	Standard Industrial Classifications
<u>SIU</u>	Significant Industrial User
<u>SWDA</u>	Solid Waste Disposal Act (42 USC 6901, et seq.)
<u>TOC</u>	Total Organic Carbon
<u>TDS</u>	Total Dissolved Solids
<u>TSCA</u>	Toxic Substances Control Act
<u>TSS</u>	Total Suspended Solids
<u>TTO</u>	Total Toxic Organics
<u>USC</u>	United States Code

USEPA

U.S. Environmental Protection Agency

SECTION 2 SEWER USE REQUIREMENTS

SECTION 2.1 PROHIBITED DISCHARGE STANDARDS

It shall be unlawful for any user to contribute or cause to be contributed directly or indirectly, any pollutant or wastewater which will pass through or cause interference with the operation or performance of the POTW whether or not the user is subject to categorical pretreatment standards or any other national, state, or local pretreatment standard or requirement. A user shall not contribute the following pollutants, substances, or wastewater to the POTW:

- A. Any liquids, solids, or gases which, by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause a fire or explosion or be injurious in any other way to the POTW or the operation of the POTW. This includes wastestreams with a closed-cup flashpoint of less than 140 degrees F (60 degrees C) using the test methods specified in 40 CFR Part 261.21. Closed-cup flashpoint values may be found in the National Institute of Occupational Safety and Health (NIOSH) *Pocket Guide to Chemical Hazards*. At no time shall two successive readings on an explosion hazard meter at the point of discharge into the system (or at any point in the system) be more than five percent (5%) nor any single reading over ten percent (10%) of the Lowest Explosive Limit (LEL) of the meter. Prohibited materials include, but are not limited to: gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, perchlorates, bromates, carbides, hydrides, sulfides, and any other substances which the Authority, the state, or USEPA has notified the user is a fire hazard to the system.
- B. Solids or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities.
- C. Wastes having a pH lower than 6.0 or higher than 11.0 or having any corrosive property capable of causing damage or hazards to structures, equipment, or personnel of the sanitary sewer system. Where the Authority deems it advisable, it may be required that any user discharging industrial wastes install and maintain, in an approved manner, a suitable device to continuously measure and record the pH of the wastes so discharged.
- D. Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the Plant, or to exceed the limitations set forth in a categorical pretreatment standard. A toxic pollutant shall include, but not limited to, any pollutant identified pursuant to the Act.
- E. Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life and health, or is sufficient to prevent entry into the sanitary sewer system for testing, maintenance, and repair.
- F. Any substance which may cause the Plant's effluent or any other product of the Plant such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to

interfere with the reclamation process. In no case shall a substance discharged to the POTW cause the Plant to be in non-compliance with sludge use or disposal criteria, guidelines or regulations developed under the Act; any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the SWDA, or State criteria applicable to the sludge management method being used.

- G. Any substance which will cause the Plant to violate its NPDES permit.
- H. Any wastewater with objectionable color not removed in the treatment process.
- I. Any wastewater with heat in amounts which inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the Plant exceeds 40° C (104°F) unless the Authority upon requests of the Plant approves alternate temperature limits.
- J. Any pollutants including oxygen demanding pollutants (BOD, etc.) released at a flow rate and/or pollutants concentration which a user knows or has reason to know will cause interference to the POTW. In no case shall a sudden unexpected discharge have a flow rate or contain concentrations or quantities or pollutants that exceed for any time period longer than fifteen (15) minutes more than five (5) times the average twenty-four (24) hour concentration, quantities, or flow during normal operation.
- K. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by applicable State or Federal regulations.
- L. Any wastewater which causes a hazard to human life or creates a public nuisance.
- M. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, condensate, deionized water, noncontact cooling water, and unpolluted industrial wastewater.
- N. Limitations on point of discharge: No person shall discharge directly into a manhole or other opening in the sanitary sewer system other than through an approved building sewer, except upon written application by the user and payment of the applicable user charges and fees.
- O. Wastes containing visible amounts of grease, oil, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in concentrations, flows, or amounts that will cause interference or pass through, sufficient to cause stoppage, pluggage, or obstruction of flow to the Plant, or any other damage, or increased maintenance of the sanitary sewer system.
- P. Any trucked or hauled pollutants may not be disposed of except at discharge points designated by the POTW.

Wastes prohibited by this section, shall not be processed or stored in such a manner that they could be discharged to the POTW. All floor drains located in process or materials storage areas must discharge to the user's pretreatment facility before connecting with the POTW.

SECTION 2.2 NATIONAL CATEGORICAL PRETREATMENT STANDARDS

- A. National categorical pretreatment standards shall be in addition to Prohibited Discharge Standards cited in Section 2.1 of this ordinance.
- B. Upon promulgation of the categorical pretreatment standards for a particular industrial category, the categorical pretreatment standard, if more stringent than limitations imposed under this section for sources in that category, shall notify all affected users of the applicable reporting requirements of 40 CFR Part 403.12.
- C. Where specific prohibitions or limits on pollutants or pollutant parameters are developed by the Authority in accordance with Prohibited Discharge Standards (Section 2.1 of this ordinance), such limitations shall be deemed pretreatment standards for the purpose of the Act.

SECTION 2.3 LOCAL LIMITS

The Authority is authorized to establish local limits pursuant to 40 CFR Part 403.5(c). The following pollutant limits are established to protect against pass through and interference. It shall be unlawful for any user to discharge wastewater containing in excess of the following daily maximum limits:

Pollutant	Daily Maximum Limit (mg/L)
Arsenic	0.88
Biochemical oxygen demand (5-day)	610
Cadmium	0.01
Chloride	2,900
Chromium	5.1 1.8
Copper	1.8 0.50
Cyanide	0.03 2.7
Lead	4.2
Mercury	2,500
Nickel	9,500
Silver	1,000
Sodium	1.4 100
Total dissolved solids	*
Total suspended solids	*
Zinc	
Oil and grease (as petroleum hydrocarbons)	Trace
total identifiable chlorinated hydrocarbons	Trace
toxic organic compounds	

* Trace refers to the sum of all toxic organic compounds exceeding 1 mg/L. In such cases, the Authority may require additional testing and/or investigation to determine if the discharge may be allowed. The Authority may define the actual limits assigned to the discharger in the wastewater discharge permit.

Concentrations apply at the point where the waste is discharged to the POTW. All concentrations for metallic substance are for “total” metals unless indicated otherwise. The Authority may impose mass limitations in addition to or in place of the concentration-based limitations above.

The Authority may develop Best Management Practices, by ordinance or in a wastewater discharge permit, to implement the local limits and the requirements of Section 2.1 of this ordinance.

SECTION 2.4 STATE OR MEMBER AGENCY REQUIREMENTS

State requirements and limitations on discharges shall apply in any case where they are more stringent than Federal requirements or limitations in this ordinance. A Member Agency's requirements and limitations on discharges shall apply in any case within territorial jurisdiction of the Member Agency where they are more stringent than Federal requirements or limitations in this ordinance.

SECTION 2.5 AUTHORITY'S RIGHT OF REVISION

The Authority reserves the right to establish by ordinance or wastewater discharge permits more stringent limitations or requirements on discharges to the sanitary sewer system.

SECTION 2.6 DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT

It shall be unlawful for any user to increase the use of process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the pretreatment standards. The Authority may impose mass limitations on users who are using dilution to meet applicable pretreatment standards and requirements, or in other cases where the imposition of mass limitations is appropriate.

SECTION 2.7 DISCHARGE TO NATURAL OUTLETS

It shall be unlawful to discharge to the ground surface, storm drain inlet, storm drain, roof drain, sidewalk, drainage ditch, parking lot, curb/gutter, creek, river, or channel any sanitary sewage, wastes, petroleum products, coal tar, or any refuse from any residential, commercial, industrial, or institutional establishments.

SECTION 2.8 HOLDING TANK WASTE OR TRUCKED WASTE

It shall be unlawful for any user to discharge holding tank waste or trucked waste into a sanitary sewer without prior written approval of the Authority. Unless otherwise provided in an approval, a separate written approval must be secured for each separate discharge. Applications for holding tank or trucked waste discharge approvals shall state the specific location of the discharge, the time of day the discharge is to occur, the volume of the discharge, and the wastewater constituents and characteristics of the discharge. If approval is granted for the discharge of such waste into the sanitary sewer system, the user shall pay the applicable user charges and fees and shall meet such other conditions as required by the Authority.

SECTION 2.9 WASH RACK WASTE

No user owning or operating private or public automobile wash rack shall permit any water or effluent to flow into the sanitary sewer system unless such wash rack is roofed over and is equipped with a sand-oil interceptor approved by the Authority.

SECTION 2.10 DRAINING OF SWIMMING POOLS

It shall be unlawful for any person to discharge water from swimming pools, whether public or private, into a storm sewer or gutter. All swimming pool water shall be discharged into a sanitary sewer system and only upon authorization of the Authority, payment of the applicable user charges and fees, and satisfaction of such other conditions as are reasonably required by the Authority.

SECTION 3 PRETREATMENT OF WASTEWATER

SECTION 3.1 PRETREATMENT FACILITIES

Users shall provide all wastewater pretreatment facilities required to comply with this ordinance and shall achieve compliance with all categorical pretreatment standards, local limits, and the prohibitions set forth in Section 2 of this ordinance within the time limitations specified by USEPA, the state, or the Authority, whichever is more stringent. Facilities required to pretreat wastewater to a level acceptable to the Authority shall be provided, operated, and maintained at the user's expense. Detailed plans showing the pretreatment facilities and operating procedures shall be submitted to the Authority for review, and shall be acceptable to the Authority before construction of this facility. The review of such plans and operating procedures will in no way relieve the user from the responsibility of modifying the facility as necessary to produce an effluent acceptable to the Authority under the provisions of this ordinance. Any subsequent changes in the pretreatment facilities or method of operation shall be reported to and be acceptable to the Authority prior to the user's initiation of the changes. The user shall retain all records relating to compliance with Pretreatment Standards and make them available to officials of the USEPA or Central Coast Water Board upon request.

Whenever deemed necessary, the Authority may require users to restrict their discharge during peak flow periods, designate that certain wastewater be discharged only into specific sewers, relocate, and/or consolidate points of discharge, separate sewage wastestreams from process wastestreams, and such other conditions as may be necessary to protect the POTW and determine the user's compliance with the requirements of this ordinance.

The Authority may require any person discharging into the POTW to install and maintain, on their property and at their expense, a suitable storage and flow-control facility to ensure equalization of flow. A wastewater discharge permit may be issued solely for flow equalization.

SECTION 3.2 GREASE INTERCEPTORS

- A. Any business or establishment such as, but not limited to, restaurants, bakeries, donut shops, takeout, drive-in eating establishments, ice cream or milk drive-in stations, hospitals, hotels, markets, recreation or reception halls, etc., where any grease or other objectionable materials may be discharged into the public sanitary sewer system or a private sewage disposal system, shall have a grease interceptor.
- B. Interceptors shall be constructed in accordance with applicable standards approved by the Authority.

- C. Each grease interceptor shall be so installed and connected that it shall be at all times easily accessible for inspection, cleaning, and removal of the intercepted grease. Proper installation of the grease interceptor shall meet the Plumbing Code and approval of the Authority.
- D. Each business establishment, for which a grease interceptor is required, shall have an interceptor which shall serve only that business establishment.
- E. Buildings remodeled to accommodate uses requiring interceptors shall be subject to this ordinance.
- F. Waste discharged from fixtures and equipment in the above-mentioned types of establishments which may contain grease or other objectionable materials, including, but not limited to, scullery sinks, pot and pan sinks, dishwashers, soup kettles, etc., and floor drains located in areas where such objectionable materials may exist, may be drained into the sanitary sewer system through the interceptor only after the approval by the Authority. Exception: toilets, urinals, and other fixtures containing fecal material may not flow through the interceptor.
- G. Interceptors shall be maintained in efficient operating condition by periodic removal of the accumulated grease. No such collected grease shall be introduced into any drainage pipe or the sanitary sewer system or private sewage disposal system.
- H. Abandoned grease interceptors shall be emptied and filled as required for abandoned septic tanks in the Uniform Plumbing Code (UPC).

SECTION 3.3 ACCIDENTAL DISCHARGE/SLUG DISCHARGE CONTROL PLANS

The Authority shall evaluate whether each SIU needs an accidental discharge/slug discharge control plan or other action to control slug discharges. The Authority may require the user to develop, submit for approval, and implement such plan or take other action that may be required to control slug discharges. Alternatively, the Authority may develop such a plan for any user. An accidental discharge/slug discharge control plan shall address, at a minimum, the following:

- A. Description of the discharge practices, including non-routine batch discharges;
- B. Description of stored chemicals;
- C. Procedures for immediately notifying the Authority Manager of any accidental or slug discharge, as required by Section 5.6 of this ordinance; and
- D. Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.

SECTION 4 ADMINISTRATION

SECTION 4.1 ESTABLISHING RULES AND REGULATIONS

The Authority is hereby authorized to establish any rules and regulations necessary or appropriate for the enforcement of this ordinance and may delegate and appoint employees of the Authority or the Member Agencies to act on his/her behalf.

SECTION 4.2 WASTEWATER DISCHARGE PERMITS

- A. It shall be unlawful for any user to connect or to discharge into the sanitary sewer system without first obtaining a wastewater discharge permit or authorization from the Authority.
- B. Users required to obtain a wastewater discharge permit shall complete and file an application with the Authority within fifteen (15) days of a notice to apply. Proposed new users shall apply a minimum of (90) days prior to the actual connection to the sanitary sewer system.
- C. The Authority will evaluate the data furnished by the user and may require additional information. After evaluation and acceptance of the data furnished, the Authority may issue a wastewater discharge permit subject to terms and conditions provided herein.
- D. Permits may be issued for a maximum duration of five (5) years. A permit may be issued for a period less than five (5) years or may be stated to expire on a specific date. Any user wishing to continue its discharge shall apply for permit reissuance prior to the expiration of the user's existing wastewater discharge permit as outlined in the wastewater discharge permit.
- E. Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned, transferred to, or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the Authority. Any succeeding owner or user shall comply with the terms and conditions of the existing permit until a new permit is issued.

SECTION 4.3 WASTEWATER DISCHARGE PERMIT APPLICATION CONTENTS

The Authority may require users seeking a wastewater discharge permit to provide the following information as part of an application:

- A. Identifying information
 - (1) The name and address of the facility, including the name of the operator and owner.
 - (2) Contact information, description of activities, facilities, and plant production processes on the premises;
- B. Environmental permits. A list of any environmental control permits held by or for the facility;
- C. Description of operations.

- (1) A brief description of the nature, average rate of production (including each product produced by type, amount, processes, and rate of production), and standard industrial classifications of the operation(s) carried out by such user. This description should include a schematic process diagram, which indicates points of discharge to the POTW from the regulated processes.
 - (2) Types of wastes generated, and a list of all raw materials and chemicals used or stored at the facility which are, or could accidentally or intentionally be, discharged to the POTW;
 - (3) Number and type of employees, hours of operation, and proposed or actual hours of operation;
 - (4) Type and amount of raw materials processed (average and maximum per day);
 - (5) Site plans, floor plans, mechanical and plumbing plans, and details to show all sewer, floor drains, and appurtenances by size, location, and elevation, and all points of discharge;
- D. Time and duration of discharges;
- E. The location for monitoring all wastes covered by the wastewater discharge permit;
- F. Flow measurement. Information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from regulated process streams and other streams, as necessary, to allow use of the combined wastestream formula set out in 40 CFR Part 403.6(e);
- G. Measurement of pollutants
- (1) The categorical pretreatment standards applicable to each regulated process and any new categorically regulated processes for existing sources.
 - (2) The results of sampling and analysis identifying the nature and concentration and/or mass, where required by the standard or by the Authority, of regulated pollutants in the discharge from each regulated process.
 - (3) Instantaneous, daily maximum, and long-term average concentrations, or mass, where required, shall be reported.
 - (4) The sample shall be representative of daily operations and shall be analyzed in accordance with procedures set forth in Section 5.10 of this ordinance. Where the standard requires compliance with a BMP or pollution prevention alternative, the user shall submit documentation as required by the Authority or the applicable standards to determine compliance with the standard.
 - (5) Sampling must be performed in accordance with procedures set out in Section 5.11 of this ordinance.
- H. Any requests for a monitoring waiver (or a renewal of an approved monitoring waiver) for pollutants neither present nor expected to be present in the discharge based on Section 5.4(B) of this ordinance.
- I. Any other information as may be deemed necessary by the Authority to evaluate the permit application.

Incomplete or inaccurate applications will not be processed and will be returned to the user for revision. The Authority will evaluate the data furnished by the user and may require additional information. The Authority will determine whether to issue a wastewater discharge permit upon

receiving a complete permit application. The Authority may deny any application for a wastewater discharge permit.

SECTION 4.4 WASTEWATER DISCHARGE PERMIT CONDITIONS

Wastewater discharge permits shall be expressly subject to all provisions of this ordinance and all other applicable regulations, user charges, and fees established by the Authority or its Member Agencies.

Wastewater discharge permits must contain the following:

- A. A statement that indicates the wastewater discharge permit issuance date, expiration date, and effective date.
- B. A statement that the wastewater discharge permit is nontransferable without prior notification to the Authority in accordance with Section 3.2(E) of this ordinance, and provisions for furnishing the new owner or operator with a copy of the existing wastewater discharge permit.
- C. Effluent limits, including BMPs, based on applicable pretreatment standards.
- D. Self-monitoring, sampling, reporting, notification, and recordkeeping requirements. These requirements shall include an identification of pollutants (or BMPs) to be monitored, sampling location, sampling frequency, and sample type based on Federal, State, and local law.
- E. The process for seeking a waiver from monitoring for a pollutant neither present nor expected to be present in the discharge in accordance with Section 5.4(B).
- F. A statement of applicable civil and criminal penalties for violation of pretreatment standards and requirements, and any applicable compliance schedule.
- G. Compliance schedules – If additional pretreatment and/or operations and maintenance are required to meet the pretreatment standards, the wastewater discharge permit shall require the user to follow and schedule to provide such additional pretreatment at the earliest possible date. The completion date in this schedule shall not be later than the compliance date established for the applicable pretreatment standard. The following conditions shall apply to this schedule:
 - (1) The user shall prepare and submit at his/her expense a proposed schedule for inclusion in the permit. The Authority shall review and refine such schedule at the user's expense.
 - (2) The schedule shall contain performance standards in the form of dates for the commencement and completion in the shortest of major events, leading to the construction and operation of additional pretreatment that may be required for the user to meet applicable pretreatment standards (e.g. hiring and engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, etc.).
 - (3) No increment referred to in a paragraph (1) shall exceed nine (9) months.
 - (4) Not later than fourteen (14) days following each performance standard date and the final date for compliance, the user shall submit a progress report to the

Authority, including, at minimum, whether or not it complied with the performance standard, the reason for the delay, and the steps being taken by the user to return to the schedule established.

- (5) Failure to satisfy any performance standard of the final date for compliance shall constitute a material violation of the wastewater discharge permit.
- H. Requirements for notifying the Authority of slug discharges;: The Authority shall evaluate whether each user needs an accidental discharge/slug discharge control plan or other action to control slug discharges. The Authority may require any user to develop, submit for approval, and implement such a plan or take such other action that may be necessary to control slug discharges. An accidental discharge/slug discharge control plan shall address, at a minimum, the following:
 - (1) Description of discharge practices, including nonroutine batch discharges;
 - (2) Description of stored chemicals;
 - (3) Procedures for immediately notifying the Authority of any accidental or slug discharge, as required by Section 6.6 of this ordinance; and,
 - (4) Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.
- I. Any grant of the monitoring waiver by the Authority must be included as a condition in the wastewater discharge permit.

Wastewater discharge permits may contain the following:

- A. The unit charge or schedule of user charges and fees for the wastewater to be discharged to the sanitary sewer system;
- B. Limits on the average and maximum wastewater constituents and characteristics;
- C. Limits on the average and maximum rate and time of discharge or requirements for flow regulations and equalization;
- D. Requirements for installation and maintenance of inspection and sampling facilities; or
- E. Other conditions as deemed appropriate by the Authority to ensure compliance with this ordinance.

SECTION 4.5 WASTEWATER DISCHARGE PERMIT MODIFICATIONS

The Authority may modify a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- A. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
- B. To address significant alterations or additions to the user's operation, processes, or wastewater volume or character since the time of the wastewater discharge permit issuance;

- C. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- D. Information indicating the user poses a threat to the POTW, Authority personnel, public health, or the environment;
- E. Violation of any terms or conditions of the wastewater discharge permit;
- F. Misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting; or
- G. To correct typographical or other errors in the wastewater discharge permit.

The user shall be informed of any proposed changes to a permit at least thirty (30) days to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

SECTION 5 REPORTING REQUIREMENTS

SECTION 5.1 BASELINE MONITORING REPORTS

Within ninety (90) days following the date for final compliance with applicable pretreatment standards or, in the case of a new source, following commencement of the introduction of wastewater into the sanitary sewer system any user subject to pretreatment standards and requirements shall submit to the Authority a Baseline Monitoring Report stating the following:

- A. Identifying Information.
 - (1) The name and address of the facility, including the name of the operator and owner.
 - (2) Contact information, description of activities, facilities, and plant production processes on the premises;
- B. Environmental Permits. A list of any environmental control permits held by or for the facility.
- C. Description of Operations.
 - (1) A brief description of the nature, average rate of production (including each product produced by type, amount, processes, and rate of production), and standard industrial classifications of the operation(s) carried out by such user. This description should include a schematic process diagram, which indicates points of discharge to the POTW from the regulated processes.
 - (2) Types of wastes generated, and a list of all raw materials and chemicals used or stored at the facility which are, or could accidentally or intentionally be, discharged to the POTW;
 - (3) Number and type of employees, hours of operation, and proposed or actual hours of operation;
 - (4) Type and amount of raw materials processed (average and maximum per day);
 - (5) Site plans, floor plans, mechanical and plumbing plans, and details to show all sewers, floor drains, and appurtenances by size, location, and elevation, and all points of discharge;
- D. Time and duration of discharges;
- E. The location for monitoring all wastes covered by the permit;
- F. Flow Measurement. Information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from regulated process streams and other streams, as necessary, to allow use of the combined wastestream formula set out in 40 CFR Part 403.6(e).
- G. Measurement of Pollutants.
 - (1) The user shall take a minimum of one representative sample to compile that data necessary to comply with the requirements of this paragraph.
 - (2) Samples should be taken immediately downstream from pretreatment facilities if such exist or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment, the user should measure the flows and

concentrations necessary to allow use of the combined wastestream formula in 40 CFR Part 403.6(e) to evaluate compliance with the pretreatment standards. Where an alternate concentration or mass limit has been calculated in accordance with 40 CFR Part 403.6(e), this adjusted limit along with supporting data shall be submitted to the Authority.

- (3) Sampling and analysis shall be performed in accordance with Section 4.4 of this ordinance.
 - (4) The Authority may allow the submission of a baseline report which utilizes only historical data so long as the data provides information sufficient to determine the need for pretreatment measures;
 - (5) The baseline report shall indicate the time, date, and place of sampling and methods of analysis, and shall certify that such sampling and analysis is representative of normal work cycles and expected pollutant discharges to the POTW.
- H. Compliance Certification. A statement, reviewed by the user's authorized representative and certified by a qualified professional, indicating whether pretreatment standards are being met on a consistent basis, and, if not, whether additional operation and maintenance (O&M) and/or additional pretreatment is required to meet the pretreatment standards and requirements.
- I. Compliance Schedule. If additional pretreatment and/or O&M will be required to meet the pretreatment standards, the shortest schedule by which the user will provide such additional pretreatment and/or O&M must be provided. The completion date in this schedule shall be no later than the compliance date established for the applicable pretreatment standard. A compliance schedule pursuant to this Section must meet the requirements set out in Section 3.3(G) of this ordinance.
- J. Signature and Report Certification. All baseline monitoring reports must be certified in accordance with Section 4.3(F) of this ordinance and signed by an authorized representative of the user.

SECTION 5.2 COMPLIANCE SCHEDULE PROGRESS REPORTS

The following conditions shall apply to the compliance schedule required by Section 5.1(K) of this ordinance:

- A. The schedule shall contain progress increments in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the user to meet the applicable pretreatment standards (such events include, but are not limited to, hiring an engineer, completing preliminary and final plans, executing contracts for major components, commencing and completing construction, and beginning and conducting routine operation);
- B. No increment referred to above shall exceed nine (9) months;
- C. The user shall submit a progress report to the Authority no later than fourteen (14) days following each date in the schedule and the final date of compliance including,

as a minimum, whether or not it complied with the increment of progress, the reason for any delay, and, if appropriate, the steps being taken by the user to return to the established schedule; and

- D. In no event shall more than nine (9) months elapse between such progress reports to the Authority.

SECTION 5.3 REPORTS ON COMPLIANCE WITH CATEGORICAL PRETREATMENT STANDARD DEADLINE

Within ninety (90) days following the date for final compliance with applicable categorical pretreatment standards, or in the case of a new source following commencement of the introduction of wastewater into the POTW, any user subject to pretreatment standards and requirements shall submit to the Authority a report containing the information in Section 5.1(F) and (G) of this ordinance. All compliance reports must be signed and certified in accordance with Section 5.3(F) of this ordinance. All sampling will be done in conformance with Section 5.11 of this ordinance.

SECTION 5.4 PERIODIC COMPLIANCE REPORTS

- A. Except as specified in Section 5.4(C), all SIUs must, at a frequency determined by the Authority, submit no less than twice per year (January 15 and July 15) reports indicating the nature, concentration of pollutants in the discharge which are limited by pretreatment standards and the measured or estimated average and maximum daily flows for the reporting period. In cases where the pretreatment standard requires compliance with a BMP or pollution prevention alternative, the user must submit documentation required by the Authority or the pretreatment standard necessary to determine the compliance status of the user.
- B. The Authority may authorize a user subject to a categorical pretreatment standard to forego sampling of a pollutant regulated by a categorical pretreatment standard if the user has demonstrated through sampling and other technical factors that the pollutant is neither present nor expected to be present in the discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the user. This authorization is subject to the following conditions:
 - (1) The waiver may be authorized where a pollutant is determined to be present solely due to sanitary wastewater discharged from the facility provided that the sanitary wastewater is not regulated by an applicable categorical standard and otherwise includes no process wastewater.
 - (2) The monitoring waiver is only valid for the duration of the effective period of the wastewater discharge permit, but in no case longer than five (5) years. The user must submit a new request for the waiver before the waiver can be granted for each subsequent wastewater discharge permit.
 - (3) In making a demonstration that a pollutant is not present, the user must provide data from at least one sampling of the facility's process wastewater prior to any treatment present at the facility that is representative of all wastewater from all processes.

- (4) The request for a monitoring waiver must be signed by a duly authorized representative of the user and include the certification statement in Section 5.14(A) of this ordinance.
 - (5) Non-detectable sample results may be used only as a demonstration that pollutant is not present if the USEPA-approved method from 40 CFR Part 136 with the lowest minimum detection level for that pollutant was used in the analysis.
 - (6) Any grant of the monitoring waiver by the Authority must be included as a condition in the user's wastewater discharge permit. The reasons supporting the waiver and any information submitted by the user in its request for the waiver must be maintained by the Authority for three (3) years after expiration of the waiver.
 - (7) Upon approval of the monitoring waiver and revision to the user's wastewater discharge permit by the Authority, the user must certify on each report with the statement in Section 5.14(C) below that there has been no increase in the pollutant in its wastestream due to activities of the user.
 - (8) In the event that a waived pollutant is found to be present or expected to be present because of changes that occur in the user's operations, the user must immediately: comply with monitoring requirements or other more frequent requirements imposed by the Authority and notify the Authority.
 - (9) This provision does not supersede certification processes and requirements established in categorical pretreatment standards, except as other specified in the categorical pretreatment standard.
- C. The Authority may reduce the requirement for periodic compliance reports to a requirement to report no less frequently than once per year, unless required more frequently in the pretreatment standard or by USEPA where the user's total categorical wastewater flow does not exceed any of the following:
- (1) 0.01 percent of the Plant's design dry weather hydraulic capacity or five thousand (5,000) gallons per day, whichever is smaller, as measured by a continuous effluent flow monitoring device unless the user discharges in batches;
 - (2) 0.01 percent of the design dry weather organic treatment capacity of the Plant; and
 - (3) 0.01 percent of the maximum allowable headworks loading for any pollutant regulated by the applicable categorical pretreatment standard for which approved local limits were developed in accordance with Section 2.3 of this ordinance.

Reduced reporting is not available to users that have in the last two (2) years been in significant noncompliance, as defined Section 1.4(AAA) of this ordinance. In addition, reduced reporting is not available to a user with daily flow rates, production levels, or pollutant levels that vary so significantly that, in the opinion of the Authority, decreasing the reporting requirement for this user would result in data that are not representative of conditions occurring during the reporting period.

- D. All periodic compliance reports must be signed and certified in accordance with Section 5.14(A) of this ordinance.
- E. All sampling of wastewater shall be done in a manner so that the sample is representative of the nature of the wastewater being discharged to the sanitary sewer. Sample data shall be collected and analyzed using methods listed in 40 CFR Part 136 and shall be submitted to the pretreatment program. All sample data collected and analyzed using these stated methods shall be submitted to the Pretreatment Program. Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure of a user to keep its monitoring facility in good working order shall not be grounds for the user to claim that sample results are unrepresentative of its discharge.
- F. If a user subject to the reporting requirements in this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Authority, using the procedures described in Section 5.11 of this ordinance, the results of this monitoring shall be included in the report.

SECTION 5.5 REPORTS OF CHANGED CONDITIONS

Users must notify the Authority of any significant changes to the user's operations or system which might alter the nature, quality, or volume of its wastewater at least thirty (30) days before the change.

- A. The Authority may require the user submit such information as may be deemed necessary to evaluate the changed conditions, including the submission of a wastewater discharge permit application under Section 4.3 of this ordinance.
- B. The Authority may issue a wastewater discharge permit or modify an existing wastewater discharge permit in response to changed conditions or anticipated changed conditions.

SECTION 5.6 REPORTS OF POTENTIAL PROBLEMS

- A. In the case of any discharge, including, but not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, a slug discharge or slug load, that might cause potential problems for the POTW, the user shall immediately telephone and notify the Authority of the incident. This notification shall include the location of the discharge, type of waste, concentration, and volume, if known, and corrective action taken by the user.
- B. Within five (5) days following an accidental discharge, the user shall submit to the Authority a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liabilities which may be incurred as a result of damage to the POTW, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liabilities which may be imposed by this ordinance or other applicable law.

- C. A notice shall be permanently posted on the user's bulletin board or other prominent place advising employees whom to call in the event of a discharge as described in Section 5.6(A) above. Employers shall insure that all employees who may cause such an accidental discharge to occur are advised of the emergency notification procedure.
- D. SIUs are required to notify the Authority immediately of any changes at its facility affecting the potential for a slug discharge.

SECTION 5.7 REPORTS FROM UNPERMITTED USERS

All users not required to obtain a wastewater discharge permit shall provide appropriate reports to the Authority as may be required.

SECTION 5.8 NOTICE OF VIOLATION/REPEAT SAMPLING AND REPORTING

If sampling performed by a user indicates a violation, the user must notify the Authority within twenty-four (24) hours of becoming aware of the violation. The user shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Authority within thirty (30) days after becoming aware of the violation. Resampling by the user is not required if the Authority performs sampling at the user's facility at least once per month, or if the Authority performs sampling at the user's facility between the time when the initial sampling was conducted and the time when the user or the Authority receives the results of this sampling, or if the Authority has performed the sampling and analysis in lieu of the user.

SECTION 5.9 NOTIFICATION OF THE DISCHARGE OF HAZARDOUS WASTE

Any user who commences the discharge of hazardous waste shall notify the POTW, the Central Coast Water Board, and state hazardous waste authorities, in writing, of any discharge into the POTW of a substance which, if otherwise disposed of, would be hazardous waste under 40 CFR Part 261. Notifications must include the name of the hazardous waste as set for the on 40 CFR Part 261, the USEPA hazardous waste number, and the type of discharge (continuous, batch, or other). If more than one hundred (100) kg of such waste per calendar month to the POTW, the notification also shall contain the following:

- A. An identification of the hazardous constituents
- B. An estimation of the mass and concentration of such constituents
- C. An estimation of the mass and concentrations in the wastestream expected to be discharged during the following twelve (12) months

All notification must take place no later than one hundred and eighty (180) days after the discharge commences.

SECTION 5.10 ANALYTICAL REQUIREMENTS

All pollutant analyses, including sampling techniques, to be submitted as part of a wastewater discharge permit application or report shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, unless otherwise specified in an applicable categorical pretreatment standard. If 40 CFR Part 136 does not contain sampling or analytical techniques for the pollutant in question, or where USEPA determines that the 40 CFR Part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the Authority or other parties approved by USEPA.

SECTION 5.11 SAMPLE COLLECTION

Samples collected to satisfy reporting requirements must be based on data obtained through appropriate sampling and analysis performed during the period covered by the report, based on data that is representative of conditions occurring during the reporting period.

- A. Except as indicated in Section 5.11(B) and (C) below, the user must collect wastewater samples using 24-hour flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Authority. Where time-proportional composite sampling or grab sampling is authorized by the Authority, samples must be representative of the discharge. Using protocols (including appropriate preservation) specified in 40 CFR Part 136 and appropriate USEPA guidance, multiple grab samples collected during a 24-hour period may be composited prior to analysis as follows: for cyanide, total phenols, and sulfides the samples may be composited in the laboratory or field; for volatile organics and oil and grease, the samples may be composited in the laboratory. Composite samples for other parameters unaffected by the compositing procedures as documented in approved USEPA methodologies may be authorized by the Authority, as appropriate. In addition, grab samples may be required to show compliance with instantaneous limits.
- B. Samples for oil and grease, pH, temperature, cyanide, total phenols, sulfides, and volatile organics compounds must be obtained using grab collection techniques.
- C. For sampling required in support of baseline monitoring and 90-day compliance reports required in Sections 5.1 and 5.2 of this ordinance, a minimum of four (4) grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds for facilities for which historical sampling data do not exist; for facilities for which historical sampling data are available, the Authority may authorize a lower minimum. For reports required by Section 5.4 of this ordinance, the user is required to collect the number of grab samples necessary to assess and assure compliance with applicable pretreatment standards and requirements.

SECTION 5.12 DATE OF RECEIPT OF REPORTS

Written reports will be deemed to have been submitted on the date postmarked. For reports, which are not mailed, postage prepaid, into a mail facility serviced by the United States Postal Service, the date of receipt of the report shall govern.

SECTION 5.13 RECORDS RETENTION

Users subject to the reporting requirements of this ordinance shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this ordinance, any additional records of information obtained pursuant to monitoring activities undertaken by the user independent of such requirements, and documentation associated with BMPs established under Section 2.2 of this ordinance. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the date analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any litigation concerning the user or the Authority, or where the user has been specifically notified of a longer retention period by the Authority.

SECTION 5.14 CERTIFICATION STATEMENTS

- A. The following certification statement is required to be signed and submitted by users submitting the following documents: permit applications, initial monitoring waivers, baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, required periodic compliance reports, or submitting an initial request to forego sampling of a pollutant. The certification statement must be signed by an authorized representative of the user:

“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, of 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.”

- B. Annual Certification for Non-Significant Categorical Industrial Users – A facility determined to be an NSCIU by the Authority must annually submit the following certification statement signed in accordance with the signatory requirements in Section 1.4(E). This certification must accompany an alternative report required by the Authority:

“Based on my inquiry of the person or persons directly responsible for managing compliance with categorical pretreatment standards under 40 CFR

Part ____, I certify that, to the best of my knowledge and belief that during the period from ____ to ____ [month, day, year]:

- (1) The facility described as [facility name] met the definition of a non-significant categorical industrial user as described in Section 1.4(AAA)(3) of the South County Regional Wastewater Authority Ordinance No. 2024-01;
- (2) The facility has complied with all applicable pretreatment standards and requirements during this reporting period; and
- (3) The facility has never discharged more than 100 gallons of total categorical wastewater on any given day during this report period.

This compliance certification is based on the following information:

_____”

C. Certification of Pollutants Not Present

Users that have an approved monitoring waiver based on Section 5.4(B) of this ordinance must certify on each report with the following statement that there has been no increase in the pollutant in its wastestream due to activities of the user:

“Based on my inquire of the person or persons directly responsible for managing compliance with the pretreatment standard for 40 CFR Part ____, I certify that, to the best of my knowledge and belief, there has been no increase in the level of [list of pollutant(s)] in the wastewater due to the activities at the facility since the filing of the last periodic report under Section 5.4(A) of the South County Regional Wastewater Authority Ordinance No. 2024-01”

SECTION 6 COMPLIANCE MONITORING

SECTION 6.1 RIGHT OF ENTRY: INSPECTION AND SAMPLING

The Authority Manager shall have the right to enter the premises of any user to ascertain whether the user is complying with all requirements of this ordinance and any wastewater discharge permit or order issued hereunder. Users shall allow the Authority Manager ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

- A. Where a user has security measures in force which would require proper identification and clearance before entry into its premises, the user shall make necessary arrangements with its security guards so that upon presentation of suitable identification, personnel from the Authority, Central Coast Water Board, or USEPA will be permitted to enter, without delay, for the purpose of performing their specific responsibilities.
- B. The Authority Manager shall have the right to set up on the user's property, or require installation of, such devices as are necessary to conduct sampling and/or metering of the user's operations.
- C. The Authority Manager may require the user to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the user at its own expense. All devices used to measure wastewater flow and quality shall be calibrated according to the manufacturer's specification to ensure their accuracy.
- D. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the user at the written or verbal request of the Authority Manager and shall not be replaced. The costs for clearing such access shall be borne by the user.
- E. Unreasonable delays in allowing the Authority Manager access to the user's premises shall be a violation of this ordinance.

SECTION 6.2 SEARCH WARRANTS

If the Authority Manager has been refused access to a building, structure, or property, or any part thereof, and is able to demonstrate probable cause to believe that there may be a violation of this ordinance, or that there is a need to inspect and/or sample as part of a routine inspection and sampling program of the Authority designed to verify compliance with this ordinance or any permit or order issued hereunder, or to protect the overall public health, safety, and welfare of the community, the Authority Manager may seek issuance of a search warrant from the Superior Court of Santa Clara County.

SECTION 7 CONFIDENTIAL INFORMATION

SECTION 7.1 CONFIDENTIAL INFORMATION

Information and data on a user obtained from reports, surveys, questionnaires, wastewater discharge permit applications, wastewater discharge permits, monitoring programs, and from inspections shall be available to the public or other governmental agency without restriction, unless the user specifically requests, and is able to demonstrate to the satisfaction of the Authority that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets of the user under applicable state law. Any such request must be asserted at the time of submission of the information or data. When requested by the user furnishing a report that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available upon written request to governmental agencies for uses related the NPDES, state disposal system and/or the pretreatment program, and in judicial review or enforcement proceedings involving the user furnishing the report. Wastewater constituents and characteristics and other effluent data, as defined in 40 CFR Part 2.302, will not be recognized as confidential information and shall be available to the public without restriction.

SECTION 8 ENFORCEMENT

SECTION 8.1 VIOLATION NOTICE

Whenever the Authority finds that a user has violated, or continues to violate, any provision of this ordinance, a wastewater discharge permit, or order issued hereunder, the Authority may serve upon the user a written notice of violation. Within fourteen (14) calendar days of receipt of such notice, an explanation of the violation and a plan for the satisfactory correction and prevention thereof, to include specific required actions, shall be submitted by the user to the Authority. Submission of such plan in no way relieves the user of liability for any violations occurring before and after receipt of the notice of violation. Nothing in this section shall limit the authority of the Authority to take any action, including emergency actions or any other enforcement action, without first issuing a notice of violation.

SECTION 8.2 PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE

The Authority shall publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the Authority, a list of users which, at any time during the previous twelve (12) months, were in significant noncompliance with applicable pretreatment standards and requirements as defined in Section 1.4(AAA).

SECTION 8.3 CONSENT ORDER

The Authority may enter into a consent order, assurances of compliance, or other similar document establishing an agreement with any user responsible for noncompliance. Such documents shall include specific action to be taken by the user to correct the noncompliance within a time period specified by the document. Such documents shall have the same force and effect as the administrative orders issued pursuant to Sections 8.4 and 8.5 of this ordinance and shall be judicially enforceable.

SECTION 8.4 COMPLIANCE ORDER

When the Authority finds that a user has violated, or continues to violate, any provision of this ordinance, wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement, the Authority may issue an order to the user responsible for the discharge directing that the user come into compliance within a specified time. If the user does not come into compliance within the time provided, sewer service may be discontinued unless adequate treatment facilities, devices, or other related appurtenances are installed and properly operated to correct the violation. Compliance orders may also contain other requirements to address the noncompliance, including additional self-monitoring and BMPs designed to minimize the amount of pollutants discharged to the sanitary sewer system. A compliance order may not extend the deadline for compliance established for a pretreatment standard or requirement, nor does a compliance order relieve the user of liability for any violation, including any continuing violation. Issuance of a compliance order shall not be a bar against, or a prerequisite for, taking any other action against the user.

SECTION 8.5 CEASE AND DESIST ORDER

When the Authority finds that a user has violated, or continues to violate, any provision of this ordinance, a wastewater discharge permit, or order issued hereunder, or any pretreatment standard or requirement, or that the user's past violations are likely to recur, the Authority may issue an order to the user directing it to cease and desist all such violations and directing the user to:

- A. Immediately comply with all requirements; and
- B. Take such appropriate remedial or preventative action as may be needed to properly address a continued or threatened violation, including halting operations and/or terminating discharge. Issuance of a cease and desist order shall not be a bar against, or a prerequisite for, taking any other action against the user.

SECTION 8.6 ADMINISTRATIVE FINES

- A. The Authority may issue and serve an administrative complaint on any user found to be in violation of provisions of this ordinance, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement. The complaint shall allege the act or failure to act that constitutes each violation, the provisions of law authorizing the imposition of an administrative penalty, and the proposed penalty. The complaint shall inform the user named of the time and place that a hearing shall be held on the allegations of the complaint, and that the user may elect to waive this hearing.
- B. Within sixty (60) days after the user has been served, the Authority Manager shall hold a noticed public hearing, at which the Authority and the user may each present information relevant to the allegations of the complaint. Formal rules of evidence shall not apply to this hearing. The user named in the complaint may waive the right to a hearing by serving a written waiver on the Authority Manager prior to or at the time of the hearing. If the right to a hearing is waived, no hearing shall be held.
- C. Whether or not a hearing is held, the Authority Manager shall issue and serve on the user named in the complaint, and on any person who appeared at the hearing, if any, and requested a copy, a written Decision and Order. The Decision and Order shall be issued within fifteen (15) working days after:
 - (1) The date the Authority Manager is served with a waiver of hearing if no hearing is held; or
 - (2) The date the hearing is concluded, if a hearing is held.
- D. The user named in the complaint may appeal the Authority Manager's Decision and Order to the Authority Board by delivering a written notice or appeal, accompanied by full payment of any penalties assessed in the Decision and Order, to the Clerk of the Authority Board within thirty (30) days of service of the Decision and Order. The notice of appeal shall set forth grounds for appeal and reasons why the appeal should be granted. The payment shall be held by the Authority Manager, who shall compile the record of the Authority Manager's hearing for the Authority Board's review.
- E. The Authority Board may issue an Order Denying Review or may hear the appeal. If it hears the appeal, it shall do so within fifteen (15) working days of receiving the notice of appeal. On appeal, the Authority Board shall review the record of the Authority

Manager's hearing, if any, conduct an additional hearing at which formal rules of evidence shall not apply, and exercise its independent judgment on the matter. Within fifteen (15) working days after the appeal hearing is concluded, the Authority Board shall issue and serve on the user named in the complaint, and on any person who appeared at the hearing and requested a copy, a Decision and Order on Appeal affirming, reversing, or modifying the Authority Manager's Decision and Order. The user named in the complaint may seek review of the Authority Board's determination to the Superior Court of Santa Clara County by filing a petition for a writ of mandate within thirty (30) days following service of the Order Denying Review or the Decision and Order on Appeal, pursuant to California Government Code Section 54740.6.

- F. Administrative penalties which may be imposed by the Authority Manager, or the Authority Board on appeal, are as follows:
- (1) An amount not to exceed two thousand dollars (\$2,000) for each day for failing or refusing to furnish technical or monitoring reports.
 - (2) An amount not to exceed three thousand dollars (\$3,000) for each day for failing or refusing to timely comply with any compliance schedule established by the local agency.
 - (3) An amount not to exceed five thousand dollars (\$5,000) per violation for each day for discharges in violation of any waste discharge limitation, permit condition, or requirement issued, reissued, or adopted by the Authority.
 - (4) An amount not to exceed ten thousand dollars (\$10) per gallon discharge in violation of any suspension, cease and desist order, or other orders, or prohibitions issued, reissued, or adopted by the Authority.
- G. In imposing penalties, the Authority Manager or Authority Board on appeal may take into consideration all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the economic benefit derived through any noncompliance, the nature and persistence of the violation, the length of time over which the violation occurs, and corrective action, if any, taken or attempted by the Person.
- H. Unless timely appeal, all orders under Section 8.6 of this ordinance become effective and final upon issuance, and payment of penalties shall be made within thirty (30) days. Any penalties which remain delinquent for sixty (60) days shall constitute a lien against the real property of the user upon which the violations resulting in the penalty occurred. All penalties collected shall be deposited in a special account of the Authority and shall be made available for the monitoring, treatment, and control of discharges into the POTW or for other mitigation measures.
- I. No penalties shall be recoverable under Section 8.6 of this ordinance for any violation for which civil liability is recovered in the courts. Notwithstanding the foregoing, the Authority may, at its option, elect to petition the Superior Court of Santa Clara County to confirm any order establishing penalties under Section 8.6 of this ordinance and to enter judgment in conformity therewith in accordance with Sections 1285 to 1287.6 of the California Code of Civil Procedure.
- J. This Section 8.6 establishes an alternative procedure for enforcement of this ordinance and shall not be deemed to limit any other legal remedies to the Authority.

SECTION 8.7 EMERGENCY SUSPENSION OR REVOCATION OF WASTEWATER DISCHARGE PERMIT

- A. The Authority may immediately suspend a user's discharge, after informal notice to the user, whenever such suspension is necessary to stop an actual or threatened discharge, which reasonably appears to present, or cause an imminent or substantial endangerment to the health, or welfare of persons. The Authority may also immediately suspend a user's discharge, after notice and opportunity to respond, that threatens to interfere with the operation of the POTW, or which presents, or may present, an endangerment to the environment.
- (1) Any user notified of a suspension of its discharge shall immediately stop or eliminate its contribution. In the event of a user's failure to immediately comply voluntarily with the suspension order, the Authority may take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the POTW, its receiving stream, or endangerment of individuals. The Authority may allow the user to recommence discharge when the user has demonstrated to the satisfaction of the Authority Manager that the period of endangerment has passed, unless the termination proceedings in Section 8.8 of this ordinance are initiated against the user.
 - (2) A user that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written report describing the cause(s) of the harmful contribution and the measures taken to prevent any future occurrence to the Authority Manager prior to the date of any hearing.
 - (3) Nothing in section 8.7(A) shall be interpreted as requiring a hearing prior to any emergency suspension.
- B. The Authority Manager may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:
- (1) Failure to notify the Authority Manager of significant changes to the wastewater prior to the changed discharge;
 - (2) Failure to provide prior notification to the Authority Manager of changed conditions pursuant to Section 5.5 of this ordinance;
 - (3) Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
 - (4) Falsifying self-monitoring reports and certification statements;
 - (5) Tampering with monitoring equipment;
 - (6) Refusing to allow the Authority Manager timely access to the facility premises and records;
 - (7) Failure to meet effluent limitations;
 - (8) Failure to pay fines;
 - (9) Failure to pay sewer charges;
 - (10) Failure to meet compliance schedules;
 - (11) Failure to complete a wastewater survey or the wastewater discharge permit application; or

- (12) Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or this ordinance.

SECTION 8.8 TERMINATION OF DISCHARGE

In addition to the provisions identified in Section 8.7(B) of this ordinance, any user who violates the following conditions are subject to discharge termination:

- A. Violation of wastewater discharge permit conditions;
- B. Failure to accurately report the wastewater constituents and characteristics of its discharge;
- C. Failure to report significant changes in operations or wastewater volume, constituents, and characteristics prior to discharge;
- D. Refusal of reasonable access to the user's premises for the purpose of inspection, monitoring, or sampling; or
- E. Violation of pretreatment standards in Section 2 of this ordinance.

Such user will be notified of the proposed termination of its discharge and be offered an opportunity for a hearing to appeal the proposed action. Exercise of this option by the Authority shall not be a bar to, or a prerequisite for, taking any other action against the user.

SECTION 8.9 RECONSIDERATION AND APPEALS

- A. Any user affected by a decision, action, interpretation, or determination other than an Order under Section 8.6 or a decision under Section 8.7 and 8.8 made or taken pursuant to this ordinance or to any wastewater discharge permit issued hereunder, may file with the Authority Manager a written request for reconsideration within ten (10) working days of such decision, action, interpretation, or determination, setting forth in detail the facts supporting the user's request for reconsideration. The Authority Manager shall respond in writing five (10) working days.

SECTION 8.10 HEARING BY AUTHORITY MANAGER

The Authority Manager shall cause a hearing to be held:

- A. Upon timely appeal of the summary suspension or revocation of a permit pursuant to Section 8.7.
- B. Upon timely appeal of the Authority Manager's decision to refuse, discontinue, or terminate service pursuant to Section 8.8.
- C. Upon timely appeal from a response upon reconsideration by the Authority Manager pursuant to Section 8.9.

SECTION 8.11 HEARING PROCEDURE

The Authority Manager shall hold the hearing within fifteen (15) working days following notice of the appeal. The applicant shall be given notice of said hearing at least five (5) working days prior to the hearing date.

The time and place of the hearing shall be fixed in said notice. The Authority Manager shall hear the user and all witnesses together with any proper documentary evidence offered in support of or against the decision. The Authority Manager shall issue a written decision within fifteen (15) working days of the conclusion of the hearing upholding, modifying, or overruling the decision.

If, from evidence, the Authority Manager finds that substantial evidence exists to sustain the action, the Authority Manager shall order the appropriate action.

SECTION 8.12 HEARING BY THE AUTHORITY BOARD

Any user aggrieved by the written decision of the Authority Manager pursuant to Sections 8.10 and 8.11 may appeal such decision to the Authority Board. An appeal to the Authority Board shall be made by filing a written notice of appeal with the Clerk of the Board no later than ten (10) working days after the decision of the Authority Manager is issued. The notice shall set forth grounds for appeal and the reasons why such appeal should be granted. Upon receipt of said petition the Clerk shall immediately forward a copy to the Authority Manager, who shall compile the record of the hearing for the Board's review.

SECTION 8.13 ACTION BY AUTHORITY BOARD

The Authority Board shall hear the appeal at its first available meeting following the receipt of the notice of appeal. On appeal, the Authority Board shall review the record of the Authority Manager's hearing, conduct an additional hearing of the issues by the grounds for appeal (at which formal rules of evidence shall not apply), and exercise its independent judgment on the matter. The Authority Board may reverse or affirm, wholly or in part, any decision, termination or requirement of the Authority Manager or impose such conditions as the facts warrant. The decision of the Authority Board shall be final.

SECTION 8.14 INJUNCTIVE RELIEF

When the Authority Manager finds that a user has violated, or continues to violate, any provision of this ordinance, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement, the Authority Manager may petition the Superior Court of Santa Clara County through the Authority's legal counsel for issuance of a temporary or permanent injunction, as appropriate, which restrains or compels specific performance of the wastewater discharge permit, order, or other requirement imposed by this ordinance on activities of the user. The Authority may also seek other such action as is appropriate for legal and/or equitable relief, including a requirement for the user to conduct environmental remediation. A petition for injunctive relief shall not be a bar against, or a prerequisite for, taking any other action against a user.

SECTION 8.15 CIVIL PENALTIES

- A. A user who has violated, or continues to violate, any provision of this ordinance, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall be liable to the Authority for a maximum civil penalty of twenty-five thousand dollars (\$25,000) per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.
- B. The Authority may recover reasonable attorneys' fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damage incurred by the Authority.
- C. In determining the amount of civil liability, the court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factor as justice requires.
- D. Filing a suit for civil penalties shall not be a bar against, or a prerequisite for, taking any other action against the user.

SECTION 8.16 CRIMINAL PROSECUTION

- A. A user who willfully or negligently violates any provision of this ordinance, wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement shall, upon conviction, be guilty of a misdemeanor, punishable by a fine of not more than one thousand dollars (\$1,000) per violation per day, or imprisonment for not more than six (6) months, or both.
- B. A user who will willfully or negligently introduces any substance into the POTW which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor and be subject to a penalty of not more than one thousand dollars (\$1,000) per violation per day, or imprisonment for not more than six (6) months, or both. This penalty shall be in addition to any other cause of action for personal injury or property damage available under state law.
- C. A user who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to this ordinance, wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this ordinance shall, upon conviction, be punished by a fine of not more than one thousand dollars (\$1,000) per violation per day, or imprisonment for not more than six (6) months, or both.
- D. In the event of a second conviction, a user shall be punished by a fine of not more than one thousand dollars (\$1,000) per violation per day, or imprisonment for not more than six (6) months, or both.

SECTION 8.17 REMEDIES NONEXCLUSIVE

The remedies provided for in this ordinance are not exclusive. The Authority may take any, all, or any combination of these actions against a noncompliant user. Enforcement of pretreatment

violations will generally be in accordance with the Authority's Enforcement Response Plan. However, the Authority may take other action against any user when the circumstances warrant. Further, the Authority is empowered to take more than one enforcement action against any noncompliant user.

SECTION 9 WASTEWATER USER CHARGES AND FEES

SECTION 9.1 TYPES OF CHARGES FOR USER

The types of charges for industrial use may include, but are not limited to:

- A. Fees for permit application
- B. Fees for monitoring, analytical laboratory services, inspections, and surveillance.
- C. Surcharges for BOD, TSS, volume and other discharge constituents.
- D. Other fees as the Authority may deem necessary to carry out the requirements contained herein.

SECTION 9.2 RATES AND CHARGES FOR MUNICIPAL SEWER SERVICE

Rates for municipal sewer service and charges for industrial users shall be as fixed by resolution of the legislative bodies of the Member Agencies, a copy of which shall be kept on file at the Office of the Clerk of the Board. The charges established for the industrial users shall be based upon the measured or estimated constituents and characteristics of that user which may include, but not be limited to, BOD, TSS, COD, oil and grease, and volume of the wastewater.

SECTION 9.3 ESTABLISHMENT OF BOD/TSS

For the purposes of establishing the value of BOD/TSS for a commercial or industrial sewage, four or more representative samples shall be taken at reasonable intervals. Those industrial or commercial establishments whose wastes are found to fall continually within the same BOD/TSS limits will be checked only at the request of the owner of said establishment or at the discretion of the Administrator. The average (BOD/TSS) value of the waste as determined by such samples shall be applied for the billing purposes.

SECTION 9.4 WASTEWATER VOLUME DETERMINATION BY MEMBER AGENCIES

- A. Meter Water Supply – User charges and fees shall be applied against the total amount of water used from all sources unless, in the opinion of the Member Agency, significant portions of water received are not discharged to the sanitary sewer system. The total amount of water used from public and private sources will be determined by means of public meters or private meters installed and maintained at the expense of the user and approved by Member Agency.
- B. Metered Wastewater Volume and Metered Diversions – For purposes of determining other than flat rate charges set forth by Council Resolution of any member Agency the volume of effluent discharged into the sanitary sewer system and sewer service charge for such use shall be measured by an effluent meter installed at the user's expense and approved by the Program Administrator.

For users, where, in the opinion of the Member Agency, a significant portion of the water received from any metered source does not flow in to the sanitary sewer system

because of the principal activity of the user of removal by other means, the user charges and fees will be applied against the volume of water discharged from such premises into the sanitary sewer system. Written notification and proof of the diversion of water must be provided by the user if the user is to avoid the application of the user charges and fees against the total amount of water used from all sources. The user shall install a meter of a type and at a location approved by the Member Agency at the user's expense. Such meters may measure either the amount of sewage discharged or the amount of water diverted. Such meters shall be tested for accuracy at the expense of the user when deemed necessary by the Authority Manager.

C. Estimated Wastewater Volume

- (1) Users Without Source Meters - For users where, in the opinion of the Member Agency, it is unnecessary or impractical to install meters, the quantity of wastewater may be based upon an estimate prepared by the Member Agency and shall be considered as conclusive. This estimate shall be based upon a rational determination of the wastewater discharged and may consider such factors as the number of fixtures, seating capacity, population equivalent, production of goods and services or such other determinations of water use necessary to estimate the wastewater volume discharged.
- (2) Users With Source Meters – For users who, in the opinion of the Member Agency divert a significant portion of their flow from a sanitary sewer, the user charges may be based upon an estimate of the volume prepared by the user, provided the obtains a wastewater discharge permit and pays the applicable user charges and fees. The estimate must include the method and calculations used to determine the wastewater volume and may consider such factors as the number of fixtures, seating capacity, population equivalents, production of goods and services, or such other determinants of water use and necessary volume discharge.

SECTION C SEVERABILITY

If any section, subsection, subdivision, sentence, clause, phrase, or word of this ordinance is for any reason held to be invalid or unconstitutional by a court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. The Authority hereby declares that it would have passed and adopted this ordinance, and each and all provisions hereof, irrespective of the fact that one or more provisions may be declared invalid or unconstitutional.

Sewer Use Ordinance 2024-01 has been introduced to the SCRWA Board at a regular meeting held on the 3rd day of January 2024. Upon adoption, Sewer Use Ordinance 2024-01 will replace Sewer Use Ordinance 2013-01 in its entirety.

The provisions of this Ordinance are separable, and the invalidity of any phrase, clause, provision, or part shall not affect the validity of the remainder.

In accordance with Section 36937 of the Government Code of the State of California, this Ordinance shall be adopted on the 3rd day of April 2024 and take effect thirty (30) days from and after the date of its final adoption by the SCRWA Board.

PASSED AND ADOPTED this 3rd day of April, 2024 by the following roll call vote:

AYES: DIRECTORS:

NOES: DIRECTORS:

ABSTAIN: DIRECTORS:

ABSENT: DIRECTORS:

APPROVED:

Rene Spring, Chairperson

ATTEST:

Saeid Vaziry, Secretary

Attachment 2

State Water Resources Control Board Acceptance Letter

State Water Resources Control Board

December 13, 2023

(Via email)

City of Gilroy
7351 Rosanna Street
Gilroy, CA 95020

Atten: Jonathan Crick
Jonathan.Crick@ci.gilroy.ca.us

SUBJECT: South County Regional Wastewater Authority 2022 Pretreatment Compliance Audit Responses and Updated Local Limits Report Submittal

Dear Mr. Crick:

We have received the attachments and correspondence to the requirements and recommendations made in the 2022 Pretreatment Compliance Audit (PCA) report. The South County Regional Wastewater Authority (SCRWA) has met our request to provide us with responses to the 2022 PCA report and no further response is needed at this time. SCRWA has made great progress in strengthening their pretreatment program by addressing the items noted in the 2022 PCA report. The State Water Resources Control Board (SWRCB) appreciates the dedication and efforts made by the City of Gilroy to administer and improve the pretreatment program for SCRWA.

Regarding the updated local limits report submittal on November 19, 2023, the SCRWA has modified its local limit submittal from a substantial modification request submitted on April 27, 2021, to a non-substantial modification. The SCRWA non-substantial modification submittal of the updated local limits does not: Relax any legal authorities, relax local limits, change type of control mechanism, decrease frequency of self-monitoring or reporting, decrease frequency of inspections or sampling, or change in the Authorities confidentiality procedures. The SCRWA local limit study does introduce new local limits for new pollutants and incorporates more stringent limits for some existing pollutants.

On behalf of the Central Coast Regional Water Quality Control Board (Region 3), the SWRCB approves the SCRWA's local limits submitted by the City of Gilroy on November 19, 2023.

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Jonathan Crick - 2 - December 13, 2023

If you have any questions or concerns please feel free to contact me by phone at 916-327-5658 or by email at olivia.magana@waterboards.ca.gov.

Sincerely,

Olivia Magana
Water Resource Control Engineer
Pretreatment and CECs Unit

cc: Amelia Whitson, USEPA Region 9, Pretreatment Program
Jim Polek, USEPA Region 9, Pretreatment Program
Erica Kalve, State Water Resources Control Board
Arnold Wong, State Water Resources Control Board
Arwen Wyatt-Mair, Central Coast Regional Water Quality Control Board (Region 3)
Leah Lemoine, Central Coast Regional Water Quality Control Board (Region 3)
Audrey Libhaber, Central Coast Regional Water Quality Control Board (Region 3)
Saeid Vaziry, City of Gilroy
Isaias Lona, City of Gilroy

Attachment 3

SCRWA Audit SUO Findings and Responses

IV. Findings Summary Table		
Part V Section Reference – Finding	Requirement(s)	Recommendation(s)
Finding D.1.b – Section 1.4 definitions for “Indirect Discharge or Discharge”, “Interference”, and “Publicly Owned Treatment Works or POTW” are incomplete.	6 Addressed. See details below.	6
Finding D.1.c – Add language to clarify “Industrial User (or Equivalent)”, “Pass Through”, and “Pretreatment Requirement” definitions.	Addressed. See details below.	7
Finding D.1.d – Minor corrections were found in the “Significant Industrial User” definition.	Addressed. See details below.	8
Finding D.1.e – Minor correction was found in the Significant Noncompliance definition.	Addressed. See details below.	9
Finding D.1.f – Discrepancies found in the 2020-07-23 Local Limits report.	7	Addressed. See details below.
Finding D.1.g – Deny or revoke language is missing from this section.	8	Addressed. See details below.
Finding D.1.h – Minor correction, wrong section referenced in Section 4.4(E)		10
Finding D.1.i – The SUO is missing language regarding periodic reports from significant non-	9	
Finding D.2 – The Authority has not verified the City of Morgan Hill’s SUO or JPA to ensure consistency.	MH Engineering/utilities to update.	11
Finding G.2 – The Authority’s ERP requires	12	Addressed. See details below.

Recommendation 5

The Authority is required to revise definitions to mirror those found at 40 CFR 403.3, or be at least as stringent in their respective definitions.

The definition for daily maximum and Significant noncompliance have been revised per 40CFR 403.3

D. Legal Authority

1. Does the SUO provide the CA adequate legal authority, consistent with 40 CFR 403.8(f)(1)?

As a component of this Pretreatment Compliance Audit, the Audit Team compared the SUO with the provisions of 40 CFR Part 403.

Finding D.1.a – Section 1.4 of the Authority’s SUO does not define the following terms
“National Pretreatment Standard, Pretreatment Standard or Standard” and “Approved

POTW Pretreatment Program”.

The Authority’s SUO does not provide required SOU definitions listed in 40 CFR 403.

The following pages are related to the updating of the SCRWA SUO ordinance.

Regulatory Requirements

40 CFR 403.3(l) defines *National Pretreatment Standard, Pretreatment Standard, or Standard* as, “Any regulation containing pollutant discharge limits promulgated by the EPA in accordance with section 307 (b) and (c) of the Act, which applies to Industrial Users. This term includes prohibitive discharge limits established pursuant to § 403.5.”

40 CFR 403.3(d) defines *Approved POTW Pretreatment Program o Program or POTW Pretreatment Program* as, “A program administered by a POTW that meets the criteria established in this regulation (§§403.8 and 403.9) and which has been approved by a Regional Administrator or State Director in accordance with § 403.11 of this regulation.”

Requirement 5

The Authority is required to update its SUO to define terms as defined in 40 CFR 403.3.

The SUO has been updated to provide the required definition listed in 40 CFR 403.3

Finding D.1.b – Section 1.4 definitions for “Indirect Discharge or Discharge”,

“Interference”, and “Publicly Owned Treatment Works or POTW” are incomplete. The Authority’s SUO is required to update definitions to include appropriate language referenced in 40 CFR 403.

Regulatory Requirements

40 CFR 403.3(i) defines *Indirect Discharge or Discharge* as, “The introduction of pollutants into a POTW from any non-domestic source regulated under section 307 (b) and (c) or (d) of the Act.”

40 CFR 403.3(d) defines *Interference* as, “A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- (1) Inhibits or disrupts the POTW, its treatment process or operations, or its sludge processes, use or disposal; and
- (2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.”

40 CFR 403.3(q) defines *Publicly Owned Treatment Works or POTW* as, “A treatment works as defined by section 212 of the Act, which is owned by a State or municipality (as defined by section 502(4) of the Act). This definition includes any devices and systems used in the storage, treatment, recycling and

reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes and other conveyances only if they convey wastewater to a POTW Treatment Plant. The term also means the municipality as defined in section 502(4) of the Act, which has jurisdiction over the Indirect Discharges to and the discharges from such a treatment works.

Requirement 6

The Authority is required to update its SUO to include language that is necessary to clarify terms as defined in 40 CFR 403.3. The term *Indirect Discharge or Discharge* is missing “Section 307(b), (c), or (d) of the Act” from the definition. The term *Interference* is missing “Marine Protection, Research and Sanctuaries Act” from the definition. The term *Publicly Owned Treatment Works or POTW* is missing “Section 502(4)” from the definition.

These terms have been added to the SUO per Requirement 6.

Recommendation 6

It is recommended that the Authority add the following language to the *Publicly Owned Treatment Works or POTW* term “Also referred to in this document as Plant” to clarify definition.

The language has been added per Recommendation 6.

Finding D.1.c – Add language to clarify “Industrial User (or Equivalent)”, “Pass Through”, and “Pretreatment Requirement” definitions. The Authority’s SUO should consider adding additional language to clarify definitions.

Recommendation 7

It is recommended that the Authority add the following language “A source of indirect discharge” to clarify the *Industrial User (or Equivalent)* term. Also recommend adding the following language to the *Pass Through* term “into waters of the United States” for clarification. The term “user” and “industrial user” are used interchangeably throughout the SUO, recommend adding the word “industrial” to clarify user as “industrial user” for the *Pretreatment Requirements* clarification.

The additions were made per Recommendation 7.

Finding D.1.d – Minor corrections were found in the Significant Industrial User definition. Under Section 1.4(YY)(2)(c) recommend adding “in accordance with 40 CFR 403.8(f)(6)” at the end. Under Section 1.4(YY)(3)(a) recommend changing the word “completed with all applicable” to “complied with all applicable”.

Under Section 1.4(YY)(4) recommend changing the word “and SIU” to “a SIU” (second to last word).

Recommendation 8

It is recommended that the Authority make the minor revisions to the definitions listed above.

The revisions have been made per Recommendation 8.

Finding D.1.e – Minor correction was found in the “Significant Noncompliance” definition.

Under Section 1.4(ZZ)(6) definition includes “reports on compliance with categorical pretreatment standard deadlines” however, language in 40 CFR 403.8(f)(2)(viii)(F) refers to “90-day compliance reports” and not categorical pretreatment standard deadlines.

Recommendation 9

It is recommended that the Authority make the minor revisions to the definition listed above to provide more general language as specified in 40 CFR 403.

The minor revisions have been made per Recommendation 9.

Finding D.1.f – Discrepancies found in the 2020-07-23 Local Limits report.

The State Water Resources Control Board (Water Board) is in coordination with the Authority to go over the discrepancies found in the latest local limits report. The Authority will be required to correct the SUO and permits once the Local Limits report is approved by the Water Board.

The perceived discrepancies were due primarily to using different calculation methods (i.e., concentration-based versus mass-based) and significant figures. The detailed narrative is in the 2022 pretreatment report, and was discussed in the October 16, 2023 Teams Meeting with Water Board staff. Additionally, the changes to the Local Limits are considered, “Unsubstantial changes” and would therefore essentially make this finding “Not Applicable.” Most of the local limit values will remain the same. Those that will change are technically-based and more restrictive.

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes, the City of Morgan Hill is a contributing jurisdiction and the Authority has a Joint Powers Agreement (JPA) with the City of Morgan Hill

Finding D.2 – The Authority has not verified the City of Morgan Hill’s SUO or JPA to ensure consistency.

The Authority has a JPA with the City of Morgan Hill for the implementation of the pretreatment program. The Authority’s representatives had not completed a review of the JPA to ensure consistency with the Authority’s SUO requirements. The Authority has also not verified whether the City of Morgan Hill has separate SUO.

Recommendation 11

It is recommended that the Authority:

1. Review the JPA to ensure consistency with the Authority’s SUO, and
2. Verify if the City of Morgan Hill has a separate SUO.

Given that the Authority is in the process of revising its legal authority to comply with findings from previous pretreatment audit findings, it is further recommended the Authority ensure the JPA and contributing agency ordinances incorporate any revisions to the Authority’s SUO where applicable.

Recommendation 11 will be reviewed by the SCRWA legal team soon. Morgan Hill does have its own SUO, which reiterates the local limits in SUO 2013-01. The City of Morgan Hill will need to make some updates to its existing SUO.

Requirement 12

The Authority is required to update their ERP to address the minimum requirements.

The updated E.R.P will be adopted in 2024 following the requirements and recommendations of the audit.

CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: South County Regional Wastewater Authority (SCRWA)

DATE OF REVIEW: September 09, 2021

DOCUMENT REVIEWED: SCRWA Sewer Use Ordinance 2021-01-15 REVISED (clean)

Note: Several changes to the National Pretreatment Regulations made as a result of the Streamlining Rule are more stringent than the previous Federal requirements and therefore are considered required modifications for the POTW. Therefore, to the extent that existing POTW legal authorities are inconsistent with these required changes, they must be revised. Where local authorities are already consistent with these required provisions, further changes are not necessary.

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A	X			1.4(A)	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C	X			1.4(E)	
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E	X			1.4(G)	
4. Categorical Pretreatment Standard or Categorical Standard	403.6	§ 1.4 F	X			1.4(J)	
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M		X		1.4(X)	Add the following text “Section 307(b), (c), or (d) of the Act” after the word <i>Act</i> , and before <i>into</i>
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL			X	1.4(Y)	Add “A source of indirect discharge” to clarify definition.
7. Interference	403.3(k)	§ 1.4 O		X		1.4(DD)	Definition is missing Marine Protection, Research and Sanctuaries Act references per CFR. This requirement needs to be fixed.

SUO Required Edits from the RWQCB from Findings Summary with responses in red text. Green highlight indicated no response needed:

8. National Pretreatment Standard, Pretreatment Standard or Standard	403.3(l)	§ 1.4 BB		X			Not defined in section 1.4. Need to add definition to SUO Revised per comment

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
9. New Source	403.3(m)	§ 1.4 T	X			1.4(II)	
10. Pass Through	403.3(p)	§ 1.4 V			X	1.4(KK)	add text "into waters of the United States" for clarification Waters of the US was left out of this because it provide flexibility for SCRWA to enforce against pass through to other disposal or recycling options.
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA			X	1.4(RR)	User and industrial user are used interchangeably, would recommend including "industrial" user for clarification. The ordinance should be non-specific to users unless language is specific for industrial users. SCRWA has the authority to enforce against any user, whether industrial or not, if they discharge anything violation of the ordinance.
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD		X		1.4(SS)	Add "Also referred to in this document as Plant." And add section 502(4) as defined in 40 CFR 403.3 POTW and Plant are defined differently in this document. The section 502(4) reference was added.

SUO Required Edits from the RWQCB from Findings Summary with responses in red text. Green highlight indicated no response needed:

13. Significant Industrial User <i>[NOTE: §1.4 GG(3) is an optional streamlining provision for Non-Significant Categorical Industrial User classification.]</i>	403.3(v)	§ 1.4 GG			X X X	1.4(YY)	under (2)(c) - recommend adding 40 CFR 403.8(f)(6) This is a program element and not something that should be included in the ordinance. under (3)(a) - recommend changing the word "completed" to "complied" under (4) - recommend changing word "and" to "a"
14. Significant Noncompliance	403.8(f)(2)(viii)	§ 9 (A-H)			X	1.4(ZZ)	Partially correct - under (6) see 403.8(f)(2)(viii)(F); CFR 403.8(f)(2)(viii)(F) states 90-day compliance reports and not categorical pretreatment standard deadlines
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH	X			1.4(AAA)	
16. Other definitions based on terms used in the POTW Ordinance							

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
Approved POTW Pretreatment Program	403.3(d)			X			Not defined in section 1.4 This is a definition for 40 CFR Part 403 to define a Pretreatment Program, but is not typically included in the ordinance
Control Authority	403.3(f)		X			1.4(O)	
Approval Authority	403.3(c)		X			1.4(B)	
NPDES Permit	403.3(n)		X			1.4(HH)	
Pretreatment	403.3(s)		X			1.4(QQ)	
17. Middle Tier CIUs	403(f)(2)(v)(C), 403.12(e)(3), 403.12 (i)						N/A
B. National Pretreatment Standards – Prohibited Discharges							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A	X			2.1	
b. Pass Through	403.5(a)	§ 2.1A	X			2.1	
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60° C or 140° F flashpoint)	403.5(b)(1)	§ 2.1B(1)	X			2.1(A)	
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)	X			2.1(C)	
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)	X			2.1(B)	
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)	X			2.1(J)	
e. Heat; exceeds 40° C (104°F)	403.5(b)(5)	§ 2.1B(5)	X			2.1(I)	
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)	X			2.1(O)	
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)	X			2.1(E)	
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)	X			2.1(F)	
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2	X			2.2(A-C)	

SUO Required Edits from the RWQCB from Findings Summary with responses in red text. Green highlight indicated no response needed:

4. Local Limits Development <i>[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]</i>	403.5(c) & (d)	§ 2.4		X		2.3	Discrepancies found in the Local Limits report. Comments to the local limits document will be provided to the Authority in a separate document. <i>Revised per comments.</i>

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6	X			2.6	
6. Best Management Practices Development <i>[NOTE: Optional streamlining provision.]</i>	403.5(c)(4)	§ 2.4C	X			2.3	
C. Control Discharges to POTW System							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2		X		4.5	Deny or revoke language is missing from this section. POTW should explicitly cite their ability to deny discharges by denying coverage. The language is not included in this section. It is included in Section 4.3.
2. Individual Control Mechanism (e.g., permit) to ensure compliance - <i>Permit Content</i>	403.8(f)(1)(iii)	§ 4.2	X			4.4	
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)	X			4.2(D)	
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§5.2A(2)	X			4.2(E)	
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)	X			4.4(C)	
d. Best Management Practices <i>[Note: This is a required streamlining provision for CIUs with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, then this provision would be optional and is only required if the POTW has incorporated the use of BMPs (§ 2.4 C).]</i>	403.8(f)(1)(B)(3)	§ 5.2A(3)	X			4.4	
e. Self-Monitoring Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			4.4(D)	
f. Reporting & Notification Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			4.4(D)	
g. Recordkeeping Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			4.4(D)	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4) & 403.12(e)(2)	§ 5.2A(5)			X	4.4(E)	Reference made to section 4.4 (E) needs to be corrected from Section 4.3(E) to Section 5.4.
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B)(5)	§ 5.2A(6)	X			4.4(F)	
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. Where the POTW has determined that slug controls are necessary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)	X			4.4(H)	
k. Specific waived pollutant <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4)	§ 5.2A(8) & 6.4B	X			4.4(I)	
l. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					Not reviewed
m. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4	X			4.5	
n. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					Not reviewed
o. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					Not reviewed
p. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					Not reviewed
q. Requirement to submit Chain-of-Custody forms with monitoring data <i>[Note: Optional permit provision]</i>							Not reviewed

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	Part 403	Model	REVISIONS			POTW	Comments / Notes

SUO Required Edits from the RWQCB from Findings Summary with responses in red text. Green highlight indicated no response needed:

	Citation	SUO Section	NONE	REQ	REC	Ordinance Section	
3. General Control Mechanism to ensure compliance <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated the use of General Permits (§ 4.6 of the Model SUO).]</i> - Permit Content	403.8(f)(1)(iii) (A)	§ 4.2 & 4.6					N/A - The City does not issue general mechanisms
a. Statement of Duration	403.8(f)(1)(B) (1)	§§ 5.1 & 5.2A(1)					N/A - The City does not issue general mechanisms
b. Statement of Nontransferability	403.8(f)(1)(B) (2)	§ 5.2A(2)					N/A - The City does not issue general mechanisms
c. Effluent Limits	403.8(f)(1)(B) (3)	§ 5.2A(3)					N/A - The City does not issue general mechanisms
d. Best Management Practices <i>[Note: This is a required streamlining provision for CIUs with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, then this provision would be optional and is only required if the POTW has incorporated the use of BMPs (§ 2.4C).]</i>	403.8(f)(1)(B) (3)	§ 5.2A(3)					N/A - The City does not issue general mechanisms
e. Self-Monitoring Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					N/A - The City does not issue general mechanisms
f. Reporting & Notification Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					N/A - The City does not issue general mechanisms
g. Recordkeeping Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					N/A - The City does not issue general mechanisms
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[Note: Required only if POTW has incorporated the use of Pollutants Not Present and § 6.4 of the Model SUO.]</i>	403.8(f)(1)(B) (4) & 403.12(e) (2)	§ 5.2A(5)					N/A - The City does not issue general mechanisms

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		

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i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B)(5)	§ 5.2A(7)					N/A - The City does not issue general mechanisms
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. The ordinance should indicate that a user is required to develop a slug discharge control plan if determined by the POTW to be necessary.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(8)					N/A - The City does not issue general mechanisms
k. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					N/A - The City does not issue general mechanisms
l. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					N/A - The City does not issue general mechanisms
m. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					N/A - The City does not issue general mechanisms
n. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					N/A - The City does not issue general mechanisms
o. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					N/A - The City does not issue general mechanisms
p. Requirement to submit Chain-of-Custody forms with monitoring data <i>[Note: Optional permit provision]</i>							N/A - The City does not issue general mechanisms
D. Required Reports							
1. Develop compliance schedule for installation of technology	403.8(f)(1)(iv)	§§ 5.2B(2) & 10.4	X			5.1(I)	
2. Reporting Requirements [403.12] <i>Types of Reports</i>							
a. Baseline monitoring report	403.12(b)	§ 6.1					
(i) Identifying Information	403.12(b)(1)	§ 6.1B(1) & § 4.5A(1)a	X			5.1(A)(1-2)	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
(ii) Other Environmental Permits Held	403.12(b)(2)	§§ 6.1B(1) & 4.5A(2)	X			5.1(B)	

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(iii) Description of operations	403.12(b)(3)	§§ 6.1B(1) & 4.5A(3)a	X			5.1(C)	
(iv) Flow measurements	403.12(b)(4)	§§ 6.1B(2) & 4.5A(6)	X			5.1(F)	
(v) Measurement of pollutants	403.12(b)(5)	§ 6.1B(2)	X			5.1(G)	
(vi) Certification	403.12(b)(6)	§ 6.1B(3)	X			5.1(H)	
(vii) Compliance schedule	403.12(b)(7)	§ 6.1B(4)	X			5.1(I)	
b. Compliance schedule progress report	403.12(c)	§ 6.2	X			5.2	
c. Report on compliance with categorical Pretreatment Standard deadline	403.12(d)	§ 6.3	X			5.3	
d. Periodic reports on continued compliance							
- From categorical users	403.12(e)	§ 6.4A	X			5.4(A)	
- From significant non-categorical users	403.12(h)	§ 6.4A		X			Section missing from SUO. Needs to be incorporated in the SUO This is included in Section 5.4A, which specifies that all SIUs, of which categorical industrial users are included, must submit periodic compliance
e. Notice of potential problems to be reported immediately (including slug loads)	403.12(f)	§ 6.6	X			5.6(A)	
f. Notification of changes affecting potential for a slug discharge <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(vi)	§ § 6.5 & 6.6	X			5.5, 5.6	
g. Notice of violation/sampling requirement <i>[NOTE: Required streamlining revision.]</i>	403.12(g)(2)	§ 6.8	X			5.8	
h. Requirement to conduct representative sampling	403.12(g)(3)	§ 6.4E	X			5.11(A-C)	
i. Notification of changed discharge	403.12(j)	§ 6.5	X			5.5, 5.6	
j. Notification of discharge of hazardous waste	403.12(p)	§ 6.9	X			5.9	

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			NONE	REQ	REC		
<i>Other Reporting Requirements</i>							
k. Data accuracy certification & authorized signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14	X			5.14(A)	
l. Recordkeeping Requirement (3 years or longer)	403.12(o)	§ 6.13	X			5.13	
- Including documentation associated with Best Management Practices <i>[NOTE: Required streamlining provision.]</i>	403.12(o)	§ 6.13	X			5.13	
m. Submission of all monitoring data <i>[NOTE: Required streamlining revision]</i>	403.12(g)(6)	§ 6.4F	X			5.4(F)	
n. Annual certification by Non-significant categorical Industrial Users <i>[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]</i>	403.3(v)(2)	§§ 4.7C & 6.14B	X			5.14(B)	
o. Certification of pollutant not present <i>[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]</i>	403.12(e)(2)(v)	§ 6.14C	X			5.14(C)	
E. Test Procedures [40 CFR Part 136 & 403.12(g)]							
1. Analytical procedures (40 CFR Part 136) <i>[NOTE: Required streamlining provisions]</i>	403.12(g)	§ 6.10	X			5.10	
2. Sample collection procedures <i>[NOTE: Required streamlining provisions]</i>	403.12(g)(3) & (4)	§ 6.11	X			5.11(A-C)	
F. Inspection and Monitoring Procedures [403.8(f)]							
1. Right to enter all parts of the facility at reasonable times	403.8(f)(1)(v)	§ 7.1	X			6.1	
2. Right to inspect generally for compliance	403.8(f)(1)(v)	§ 7.1	X			6.1	
3. Right to take independent samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1	X			6.1	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
4. Right to require installation of monitoring Equipment	403.8(f)(1)(iv)	§ 7.1	X			6.1(B, C)	
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1	X			6.1	
G. Remedies for Non-compliance(Enforcement) [403.8(f)(1)(vi)]							
1. Non-emergency response							
a. Injunctive relief	403.8(f)(1)(vi)	§ 11.1	X			8.14	
b. Civil/Criminal penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3	X			8.15, 8.16	
2. Emergency response							
a. Immediately halt actual/threatened discharged	403.8(f)(1)(vi) (B)	§ 10.7	X			8.7	
3. Legal authority to enforce Enforcement Response Plan	403.8(f)(1)(vi)	§ 11.4	X			8.17	
H. Public Participation							
1. Publish list of Industrial Users in Significant Noncompliance <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(viii)	§ 9	X			8.2	
2. Access to data [403.8(f)(1)(vii) & 403.14]							
a. Government	403.14(a) & (c)	§ 8	X			7.1	
b. Public	403.14(b)	§ 8	X			7.1	
I. Optional Provisions							
1. Net/Gross adjustments <i>[streamlining provision]</i>	403.15	§ 2.2 D					N/A
2. Equivalent mass limits for concentration Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 E					N/A
3. Equivalent concentration limits for mass limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 F					N/A
4. Upset Notification	403.16	§ 13.1					N/A
5. Waive monitoring for pollutant not present or expected to the present <i>[streamlining provision]</i>	403.12(e)(2)	§ 6.4B	X			5.4(B)	

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6. Reduce periodic compliance reporting <i>[streamlining provision]</i>	403.12(e)(3)	§ 6.4C	X			5.4(C)	
7. Other special agreement or waivers (excluding waiver of National Categorical Pretreatment Standards and Requirements) Middle-Tier CIU (MTCIU) Retirements	403.12(e)(3)						N/A
8. Hauled Waste Reporting/Requirements		§ 3.4					N/A
9. Grease Interceptor Reporting/Requirements		§ 3.2C	X			3.2	
10. Authority to issue Notice of Violations (NOVs)		§ 10.1	X			8.1	
11. Authority to issue Administrative Orders (AOs)			X			8.3, 8.4, 8.5	
12. Authority to issue Administrative Penalties		§ 10.6	X			8.6(F)	
13. Authority to enforce against falsification or tempering			X			8.7(B)(4-5) 8.16(C)	
14. Any other supplemental enforcement actions as noted in the POTW's enforcement response plan							N/A
15. Permit Appeals Procedures			X			8.9	
16. Penalty or Enforcement Appeals Procedures							N/A
17. Bypass Notification	403.17	§ 13.3					N/A

Document(s) submitted for review: Name of Reviewers

Water Boards
Updated October 2021

SUO Required Edits from the RWQCB from Findings Summary with responses in red text. Green highlight indicated no response needed:

Gur Chand – SWRCB

Attachment 4

SCRWA Enforcement Response Plan

NOVEMBER 2023

SOUTH COUNTY REGIONAL WASTEWATER
AUTHORITY

Enforcement Response Plan

Prepared by:

LARRY WALKER ASSOCIATES



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List of Acronyms

BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
ERG	Enforcement Response Guide
ERP	Enforcement Response Plan
IU	Industrial user
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
SCRWA	South County Regional Wastewater Authority SIU
Significant Industrial User	
SNC	Significant Noncompliance
TRC	Technical Review Criteria
TSS	Total Suspended Solids
USEPA	United States Environmental Protection Agency

Introduction

The Enforcement Response Plan (ERP) outlines the procedures followed by the South County Regional Wastewater Authority (SCRWA) to identify, document, and respond to pretreatment violations. Incorporated into the ERP are specific criteria by which SCRWA can determine the enforcement action most appropriate to the nature of the violation. In addition, this ERP describes the duties of SCRWA staff, methods used to determine compliance with applicable regulations, and procedures to review compliance data. This ERP also includes the Enforcement Response Guide (ERG), which is a table referencing the degree of noncompliance with the range of enforcement responses that can be taken.

This ERP has been prepared by following USEPA's *Guidance for Developing Control Authority Enforcement Response Plans* (ERP Guidance). The ERP is organized into the following sections:

- Introduction
- Procedures for identifying noncompliance
- Evaluating noncompliance
- Enforcement tools
- Enforcement Response Guide

PURPOSE

This ERP details the enforcement procedures and lists key steps necessary to assure that wastewater discharges maintain compliance with all local, state, and federal limitations.

ENFORCEMENT LEGAL AUTHORITY

SCRWA Ordinance No. 2024-01 (Sewer Use Ordinance) provides the standards and the legal authority for the implementation and enforcement, including administrative enforcement procedures and civil and criminal penalties for violations, of the pretreatment program.

Under this ERP, the SCRWA Manager (or Authority Manager), or authorized designee, is responsible for implementation of inspection and documentation activities leading to the activation of penalties for noncompliance under the Pretreatment Program. The primary responsibilities of the Authority Manager, however, are to monitor, coordinate, and maintain the processes necessary for regulated entities to comply fully with SCRWA's wastewater requirements. In general, the Authority Manager delegates implementation and initial enforcement activities to Pretreatment Program staff.

This ERP includes a wide range of enforcement options available based on an assessment of the nature and severity of the violation. Along with the Authority Manager, SCRWA's legal counsel will enforce applicable Sewer Use Ordinance requirements, including court action if required. Specific enforcement tools and their anticipated uses are detailed in the Enforcement Tools section of this ERP.

Enforcement Staff and Responsibilities

AUTHORITY MANAGER

The Authority Manager has overall responsibility for overseeing all SCWRA wastewater operations, including compliance with all federal, state, and local regulations. The Authority Manager possesses overall responsibility for administration of all pretreatment enforcement response actions.

PRETREATMENT COORDINATOR

The Pretreatment Coordinator is responsible for implementing the Pretreatment Program, signing off on escalated enforcement actions, and ensuring compliance with all federal and state regulations.

ENVIRONMENTAL COMPLIANCE INSPECTOR

The Environmental Compliance Inspector (ECI) performs compliance sampling of industrial users (IUs) and collects samples for analysis by a contract laboratory. This position serves as the primary contact between significant industrial users (SIUs) and SCWRA regarding Pretreatment Program requirements. The ECI, in consultation with the Pretreatment Coordinator and Authority Manager, is responsible for issuing Notices of Violations (NOVs), Administrative Orders, recommending civil penalties, and publishing the annual list of significant violators.

SCWRA ATTORNEY

The SCWRA Attorney advises technical and managerial personnel on enforcement matters and orchestrates the judicial responses deemed necessary by the Authority Manager and Pretreatment Coordinator. The SCWRA Attorney is consulted on all matters requiring legal interpretation of the Sewer Use Ordinance, state and federal law, and this ERP. The SCWRA Attorney is also responsible for escalated or judicial responses associated with enforcement.

Procedures for Identifying Noncompliance

There are several activities associated with the identification and investigation of noncompliance, including maintenance of the non-residential user inventory, reviewing user submittals, and inspection and sampling activities by Pretreatment Program staff. A brief description of these activities is provided below.

NON-RESIDENTIAL USER INVENTORY

An essential step for identifying noncompliance is to accurately account for users of non-residential waste, which include SIUs to the collection system and South County Regional Wastewater Treatment Plant (Plant), where the users are located, and the nature and volume of the waste being discharged. The Authority Manager is responsible for maintaining and updating a list of these users, along with the parameters described.

REVIEW OF USER SELF-MONITORING REPORTS

Compliance monitoring involves review of compliance data obtained from self-monitoring reports submitted to SCRWA by permitted users, and information obtained by SCRWA from:

- Routine inspections of permitted users
- Referral follow-up inspections
- Routine sanitary sewer system sampling
- Direct sampling of sewer connections

Compliance data from self-monitoring reporting, routine inspections, or sampling events are promptly reviewed. This prompt review is necessary in case the user did not provide prior notification of a violation and/or a problem is noted that requires an immediate response. Situations that may require immediate response include discharges that may be toxic to the sanitary sewer system or affect hydraulic capacities or the integrity of sewer lines. Pretreatment Program staff are trained to review compliance data for both discharge and non-discharge violations and to provide notification to the Authority Manager as needed.

When the initial screening suggests noncompliance, the Authority Manager performs further evaluation, including, but not limited to, a file review of the permitted user, interviews with the user and/or SCRWA staff, and additional sampling as needed. If noncompliance is verified, then enforcement actions are initiated as appropriate.

INSPECTION AND SAMPLING

Inspection and verification sampling are another method by which SCRWA obtains compliance data other than that which is obtained directly from users. Verification sampling that is performed by SCRWA may seem redundant since self-monitoring is a SIU requirement in certain cases, but it is a critical step in verifying compliance with wastewater discharge permit requirements. The authority to perform verification monitoring exists under Section 6 of the Sewer Use Ordinance. Inspection and verification sampling may be a result of:

- Random sampling and inspection on a routine basis
- Annual sampling and inspection of each SIU as required by 40 CFR Part 403
- Response to known or suspected compliance problems
- Investigation of slug loads
- Verification of corrective actions required of the user by SCRWA

SCRWA monitors wastewater from each SIU at least once per year. SCRWA requires all sampling and analysis to be performed in accordance with 40 CFR Part 136. Quality assurance/quality control procedures are followed to maximize sample integrity. At least once per year, SCRWA conducts a comprehensive inspection of SIUs. SCRWA follows inspection procedures to ensure consistent, thorough, and well-documented inspections.

Other permitted users are inspected to verify monitoring and recordkeeping requirements on a routine basis commensurate with the perceived risk posed to the sanitary sewer system or Plant by its discharge. Samples may or may not be collected during the inspection of these users. Information gathered during monitoring and inspections of users by SCRWA is used to verify compliance status and to determine if an enforcement response must be initiated or continued.

ERP ACTIVATION

An enforcement response may be initiated when any of the following events occurs:

- Any violation of the requirements of the SCRWA Sewer Use Ordinance;
- Any violation of wastewater discharge permit requirements issued by SCRWA;
- Failure of a user to meet a compliance schedule/deadline;
- Failure of a user to report a violation of its wastewater discharge permit;
- Failures of a user to keep required records and conduct self-monitoring and/or reporting activities; or
- Violation of any federal, state, or local requirements pertaining to wastewater discharge that SCRWA has the duty to enforce.

Additionally, the SCRWA Sewer Use Ordinance sets the legal authority for SCRWA to assess administrative penalties when any user has violated or continues to violate any provision of Sewer Use Ordinance, wastewater discharge permit, or order issued thereunder, or any other legally mandated pretreatment standard or requirement. Offense(s) deemed a violation of a wastewater discharge permit or the SCRWA Sewer Use Ordinance shall include without limitation:

- Denied right-of-entry or access to applicable records or conduct inspections or sampling (Section 6.1)
- Discharge of prohibited wastes (Section 2.1)
- Failure to install and maintain any device necessary to conduct sampling and/or metering (e.g., a sample port and/or a control manhole, etc.) (Section 6.1(B))
- Violation of categorical pretreatment standards or local limits (Sections 2.2 and 2.3)
- Discharging to the POTW without first securing a wastewater discharge permit (Section 4.2)

- Failure to submit required reports or notifications (Section 5)
- Falsifying information (Section 8.7(B))
- Failure to install or maintain a grease interceptor (Section 3.2)

Evaluating Noncompliance

When considering the type of enforcement action to be taken, the ERG summarizes the range of enforcement actions that may be taken for a violation. Chapter 4.1 of the ERP Guidance discusses six criteria that SCRWA should consider when determining a proper enforcement response. Enforcement action may be escalated when considering the six criteria for evaluating the degree of noncompliance.

When an enforcement action is increased over the minimum, written documentation will detail the reasons for the increased enforcement action. The six criteria for evaluating the degree of noncompliance are:

1. **Magnitude of the Violation.** Generally, an isolated instance of noncompliance can be met with an enforcement response listed in the ERG. However, since even an isolated violation could threaten public health and the environment, damage public and private property, or threaten the integrity of the Pretreatment Program, the enforcement response to this type of violation may be escalated to:
 - Mitigate the violation quickly;
 - Prevent a reoccurrence of the violation(s);
 - Provide an appropriate level of response; and
 - Provide for cost recovery as appropriate.
2. **Duration of the Violation.** Violations (regardless of severity) which continue over prolonged periods of time should subject the user to escalated enforcement actions. The SCRWA response to these situations should prevent extended periods of noncompliance from occurring.
3. **Effect of the Violation on the Receiving Water.** One of the primary objectives of the Pretreatment Program is to prevent pollutants from “passing through” the POTW and entering the receiving waters. In this case, the receiving water of the Plant may be the underlying groundwater. Consequently, any violation which results in environmental harm warrants an escalated enforcement response. Environmental harm will be presumed whenever a user discharges a pollutant into the sanitary sewer system which:
 - Passes through the Plant and causes a violation of the SCRWA NPDES permit effluent limitations.
 - Has a toxic effect on the groundwater and/or causes a violation of the SCRWA NPDES permit. The response should ensure recovery from the user of any NPDES permit-related fines and penalties paid by SCRWA. Termination of service may also be considered for repeat violations.
4. **Effect of the Violation on the collection system and/or Plant.** Some violations may have negative impacts on the sanitary sewer system and/or Plant operations or personnel. These violations can result in increased treatment costs, upsets to treatment processes,

interference, or harm SCRWA personnel or equipment. The response should ensure recovery from users of any costs incurred by the SCRWA resulting from the violation, directly or indirectly.

5. Compliance History of the User. When evaluating the level of enforcement action to be taken for a violation, the compliance history of the user shall be reviewed. If a pattern of recurring violations for the same parameter is noted, then an escalated enforcement action may be warranted.
6. Good Faith of the User. The user's "good faith" effort in correcting its noncompliance is a factor in determining which enforcement action to take. "Good faith" may be defined as the user's honest intention to remedy its noncompliance, coupled with actions which give support to this intention. However, "good faith" does not eliminate the necessity of an enforcement action.

Enforcement Tools

Section 8 of the Sewer Use Ordinance outlines the types of enforcement tools available that may be employed with respect to users who are not in compliance with wastewater discharge permit requirements, previous enforcement actions, and pretreatment standards and requirements. The Authority Manager may take any, all, or any combination of these enforcement actions against a noncompliant user. Each of these types of enforcement actions are presented below.

TYPICAL ENFORCEMENT ACTIONS

Notice of Violation

A first step enforcement action may be the issuance of a Notice of Violation (NOV) when a violation occurs and directs the user to take corrective action. The purpose of the NOV is to inform the user of the nature of the violation and establish a “self-imposed” compliance schedule which lists the events and dates on which various steps of progress shall take place. “Self-imposed” compliance schedules should be limited to achieve compliance no later than thirty (30) days from date of issuance of the NOV.

The NOV requires the user to send a written response to SCRWA within fourteen (14) calendar days upon receipt of the NOV. The written response shall include an explanation of the cause of the violation and a discussion of corrective actions taken to mitigate the violation and actions taken to prevent future similar violations. The Authority Manager may extend the deadline up to a maximum of thirty (30) calendar days from the issuance date of the NOV, due to extenuating circumstances or hardship.

Also, for effluent limit violations, the user must conduct repeat sampling and analysis and provide the sample results to SCRWA within thirty (30) days of becoming aware of the effluent limitation violation.

Significant Noncompliance

An SIU (or any other permitted user that violations subparagraphs (c), (d), or (h) below) is determined to be in significant noncompliance if any of the following occur:

- a. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six (66) percent or more of all measurements taken for the same pollutant parameter during a six-month (6) period exceed (by any magnitude) a numeric pretreatment standard or requirement, including instantaneous limits
- b. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three (33) percent or more of wastewater measurements taken for each pollutant parameter during a six (6) month period equals or exceeds the product of the numeric pretreatment standard or requirement, including instantaneous limits, multiplied by the applicable criteria (1.4 for biochemical oxygen demand [BOD], total suspended solids [TSS], fats, oils, and grease, and 1.2 for all other pollutants except pH)

- c. Any other violation of a pretreatment standard or requirement as defined in Section 2.1 of the Sewer Use Ordinance that the Authority Manager determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of SCRWA personnel or the general public
- d. Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Authority Manager's exercise of emergency authority to halt or prevent such a discharge
- e. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance
- f. Failure to provide within forty-five (45) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standards deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules
- g. Failure to accurately report noncompliance
- h. Any other violation(s), which may include a violation of Best Management Practices (BMPs), which the Authority Manager determines will adversely affect the operations or implementation of the Pretreatment Program

SCRWA publishes annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served by the Plant, a list of the users which, at any time during the previous twelve (12) months, were in significant noncompliance with applicable pretreatment standards and requirements.

Increased Monitoring and Inspections

As a result of any discharge violation, increased sampling and inspections are required to verify that the violation has been corrected. The magnitude of the violation will dictate how many follow-up samples and inspections will be conducted to verify that the violation has been corrected. Additional inspections may be conducted until the violation is corrected. Additional monitoring will continue at the facility until the Authority Manager determines that the user has sufficiently demonstrated that the discharge is no longer in violation or a threat to violate.

ESCALATED ENFORCEMENT ACTIONS

Almost all cases of noncompliance are corrected by following the routine types of enforcement actions listed above and in the ERG. In those cases where noncompliance is not corrected, the next step in the escalation of enforcement action is the issuance of an Administrative Order. The types of administrative orders that may be taken by SCRWA include: consent orders, compliance orders, cease and desist orders, and termination of service or revocation of wastewater discharge permit.

Consent Orders

A consent order is an agreement with the user to achieve or restore compliance within a specified time. A consent order is often a stipulated agreement that may include a compliance schedule, additional self-monitoring and BMPs, the payment of monetary penalties, cost recovery, and the imposition of penalties when milestones are not met. If the user does not come into compliance

within the time provided, additional enforcement actions may occur. A consent order may not extend the deadline for compliance established for a pretreatment standard or requirement, nor does a consent order relieve the user of liability for any violation, including any continuing violation.

Compliance Orders

A compliance order directs a user to achieve or restore compliance within a specified time. A compliance order is often a stipulated agreement that may include a compliance schedule, additional self-monitoring and BMPs, the payment of monetary penalties, cost recovery, and the imposition of penalties when milestones are not met. If the user does not come into compliance within the time provided, additional enforcement actions may occur. A compliance order may not extend the deadline for compliance established for a pretreatment standard or requirement, nor does a compliance order relieve the user of liability for any violation, including any continuing violation.

Cease and Desist Orders

A cease and desist order is an order directing the user to cease and desist all such violations and directing the user to:

1. Immediately comply with all requirements; and
2. Take such appropriate remedial or preventative action as may be needed to properly address a continuing or threatened violation, including halting operations and/or terminating the discharge.

Administrative Fines

Administrative fines may be issued when the Sewer Use Ordinance, wastewater discharge permit or order issued thereunder, or any other pretreatment standard or requirement are violated. Fines are assessed in accordance with Section 8.6 of the Sewer Use Ordinance.

Emergency Suspensions

In instances when a discharge reasonably appears to present an imminent or substantial endangerment to the health or welfare of persons, it may be necessary to immediately suspend a discharge (after notice and opportunity to respond). In the event of a user's failure to voluntarily comply with the suspension order, escalating action, such as immediate severance of the sewer connection (e.g., physical disconnection or plugging), may be initiated. Further, whenever a user is in severe violation, water service may also be severed. Service will only recommence, at the user's expense, after it has satisfactorily demonstrated its ability to comply.

Termination of Discharge or Revocation of Wastewater Discharge Permit

SCRWA may issue an order to a noncompliant user of its intent to revoke the user's wastewater discharge permit and/or terminate sewer service. The Authority Manager has the authority to issue these notices and actions against the user.

Injunction

SCRWA legal counsel, upon recommendation from the Authority Manager, may seek injunctive relief through the Superior Court of Santa Clara County to restrain or compel specific performance of the wastewater discharge permit, order, or other requirement imposed by the Sewer Use Ordinance on activities of the user. The Authority Manager may also seek such other action as appropriate for legal and/or equitable relief, including a requirement for the user to conduct environmental remediation.

Civil Penalties

SCRWA legal counsel may initiate a civil lawsuit against a user in violation of the Sewer Use Ordinance, wastewater discharge permit or order issued thereunder, or any other pretreatment standard or requirement. Civil penalties may include administrative penalties, attorney's fees, court costs, and other expenses associated with enforcement activities. In determining the amount of civil penalties, all relevant circumstances including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factor as justice requires.

Criminal Prosecution

SCRWA may refer a user for criminal prosecution that willfully or negligently violates the Sewer Use Ordinance, wastewater discharge permit or order issued thereunder, or any other pretreatment standard or requirement. The user may be subject, upon conviction, to financial penalties and/or imprisonment.

SHOW CAUSE HEARING

The Authority Manager may order a user which has violated, or continues to violate, any provision of the Sewer Use Ordinance, wastewater discharge permit or order issued thereunder, or any other pretreatment standard or requirement, to appear before the Authority Manager and show cause as to why a proposed enforcement action should not be taken. Notice shall be served on the user specifying the time and place for the meeting, the proposed enforcement action, the reasons for such action, and a request that the user show cause why the proposed enforcement action should not be taken. The notice of the hearing shall be served to the user personally or by registered or certified mail (return receipt requested) at least fifteen (15) days prior to the hearing. Such notice may be served on any authorized representative of the user.

REMEDIES NON-EXCLUSIVE

Enforcement actions are not required to be initiated from the least severe enforcement action to the most severe enforcement action. As stated previously, the Authority Manager may take any, all, or any combination of the enforcement actions against a noncompliant user. The Authority Manager has the authority to take other action against any user if the circumstances warrant.

Enforcement Response Guide

This tabulated Enforcement Response Guide (ERG) designates several enforcement options for different violations or noncompliance. The Authority Manager or designee will select, using best professional judgement, the appropriate response from the guide once a violation has been detected. Implementation of this ERP must be consistent so that existing and potential users will not be able to cite inconsistency or arbitrary enforcement as a defense for their own noncompliance. Note that any of the violations tabulated in the ERG may also be subject to administrative penalties, injunctions, civil penalties, and/or criminal prosecution.

Sewer Use Ordinance No. 2024-01 Reference	Type of Violation		Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 2.1 (Prohibited Discharge Standards) Section 2.2 (National Categorical Pretreatment Standards) Section 2.3 (Local Limits)	Discharge of toxic pollutants Violation of local limits or federal categorical limits		Slight	Less than two (2) times the limit	Notice of Violation	ECI, PC
			Moderate	More than two (2) times, but below five (5) times the limit	Notice of Violation SNC Administrative Order	ECI, PC
			Severe	More than five (5) times the limit Any exceedance that adversely impacts the sanitary sewer system, Plant, or the environment	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 2.1(A) Section 2.1(B) Section 2.1(I) Section 2.7 (Discharge to Natural Outlets)	Severe	Any violation	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution		ECI, PC, Authority Manager, SCRWA Attorney	
				Recurring violation (e.g., two or more occurrences within six months)	SNC Compliance Schedule Administrative Order/ Fines	

Sewer Use Ordinance No. 2024-01 Reference	Type of Violation	Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 2.1(C)	Discharge of corrosive substance	Moderate	Excursion of pH between 5.0 and 6.0 or between 11.0 and 12.5	Notice of Violation Administrative Order/ Fines	ECI, PC
		Severe	pH less than 5.0 or more than 12.5 or 2 NOVs in a 2-month period	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 2.3 (Local Limits)	Failure to comply with Best Management Practices	Moderate	Initial violation	Notice of Violation Administrative Order/ Fines	ECI, PC
		Severe	Recurring violation (e.g., two or more occurrences within six months)	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney

Sewer Use Ordinance No. 2024-01 Reference	Type of Violation		Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 2.6 (Dilution Prohibited as Substitute for Treatment)	Use of dilution waters		Moderate	Initial violation, no known harm	Notice of Violation	ECI, PC
			Severe	Initial violation which resulted in harm to the sanitary sewer system, Plant, or the environment, or any recurring violation (e.g., two or more occurrences within six months)	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 3.2 (Grease Interceptors)	Moderate	Initial violation	Notice of Violation		ECI, PC	
			Severe	Recurring violation (e.g., two or more occurrences within six months)	Notice of Violation Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 4.2 (Wastewater Discharge Permits)	Moderate	Application up to thirty (30) days late	Notice of Violation		ECI, PC	
			Severe	Application more than thirty (30) days late	Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney

Sewer Use Ordinance No. 2024-01 Reference	Type of Violation		Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 3.1 (Pretreatment Facilities) Section 8.7 (Emergency Suspension or Revocation of Wastewater Discharge Permit)	Falsification of information - False statements - Wastewater diverted from monitoring or pretreatment equipment		Moderate	Initial violation	Notice of Violation	ECI, PC
			Severe	Recurring violation (e.g., two or more occurrences within six months)	SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 5.1 (Baseline Monitoring Reports) Section 5.2 (Compliance Schedule Progress Reports) Section 5.3 (Reports on Compliance with Categorical Pretreatment Standard Deadline) Section 5.4 (Periodic Compliance Reports)	Slight	Less than five (5) days late	Document, but no further action		ECI, PC	
	Moderate	Five (5) to forty-five (45) days late	Notice of Violation		ECI, PC	
			Severe	More than forty-five (45) days late	Notice of Violation (also document as SNC) Administrative Order/ Fines	ECI, PC, Authority Manager, SCRWA Attorney
Section 5.2 (Compliance Schedule Progress Reports) Section 5.3 (Reports on Compliance with Categorical Pretreatment Standard Deadline)	Slight	Less than five (5) days late	Document, but no further action		ECI, PC	
	Moderate	Five (5) to thirty (30) days late	Notice of Violation		ECI, PC	
			Severe	More than thirty (30) days late More than ninety (90) days late	Notice of Violation SNC Administrative Order/ Fines	ECI, PC, Authority Manager
			Moderate	Initial violation	Notice of Violation	ECI, PC

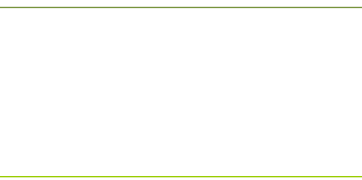
Sewer Use Ordinance No. 2024-01 Reference	Type of Violation	Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 5.6 (Reports of Potential Problems) Section 5.8 (Notice of Violation/Repeat Sampling and Reporting)	Failure to notify of permit condition(s) violation	Severe	Recurring violation (e.g., two or more occurrences within six months)	Notice of Violation SNC Administrative Order/ Fines Discharge Termination/ Suspension Injunction Civil Penalties Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 5.10 (Analytical Requirements) Section 5.11 (Sample Collection) Section 6.1(A) (Right of Entry: Inspection and Sampling)	Improper monitoring - Improper sampling and analysis - Failure to maintain monitoring facilities and equipment	Slight	Initial violation	Notice of Violation	ECI, PC
		Moderate	Recurring violation or failure to correct within thirty (30) days	Notice of Violation Administrative Order/ Fines	ECI, PC
		Severe	Failure to correct, more than thirty (30) days after due date	Administrative Order/ Fines Discharge Termination/ Suspension Injunction Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney
Section 6.1 (Right of Entry: Inspection and Sampling)	Impeding inspection procedures - Deny access to inspectors - Withhold copies of records from inspectors	Moderate	Initial violation	Notice of Violation	ECI, PC
		Severe	Recurring violation (e.g., two or more occurrences within six months)	Administrative Order/ Fines Discharge Termination/ Suspension Injunction Criminal Prosecution	ECI, PC, Authority Manager, SCRWA Attorney

Sewer Use Ordinance No. 2024-01 Reference	Type of Violation	Degree and/or Nature of Violation		Enforcement Response	Personnel
Section 8.1 (Violation Notice)	Failure to respond to NOV	Severe	More than thirty (30) days late	SNC if more than 45 days late Administrative Order/ Fines Discharge Termination/ Suspension Injunction	ECI, PC, Authority Manager

Attachment 5

SCRWA Local Limits Report





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**S O U T H C O U N T Y R E G I O N A L W A S T E W A T E R A
U T H O R I T Y**

Local Limits Report

Prepared by

LARRY WALKER ASSOCIATES

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APPENDICES

Appendix A: Local Limits Sampling Plan (November 2019)

Appendix B: USEPA Default Information; Biosolids Disposal Regulations; and NPDES Permit Restrictions

Appendix C: Local Limits Data Summary

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LIST OF ACRONYMS

AHL	Allowable headworks loading
BOD	Biochemical Oxygen Demand
CCR	California Code of Regulations
CFR	Code of Federal Regulations
DNQ	Detected but not quantified
MAHL	Maximum allowable headworks loading
MAIL	Maximum allowable industrial loading
MBR	Membrane bioreactor
MDL	Method detection limit
MGD	Million gallons per day
NIOSH	National Institute for Occupational Safety and Health
NPDES	National Pollutant Discharge Elimination System
PCB	Polychlorinated biphenyl
POC	Pollutant of concern
POTW	Publicly-owned treatment works
QA/QC	Quality assurance/quality control
RL	Reporting limit
ROS	Regression on order statistics
SCRWA	South County Regional Wastewater Authority
SCRWRF	South County Regional Wastewater and Reclamation Facility
STLC	Soluble Threshold Limit Concentration
TDS	Total dissolved solids
TSS	Total suspended solids
USEPA	United States Environmental Protection Agency

INTRODUCTION

The South County Regional Wastewater Authority (SCRWA) is required to implement a Pretreatment Program under Title 40 of the Code of Federal Regulations Part 403 (40 CFR Part 403) and its National Pollutant Discharge Elimination System (NPDES) permit (CA0049964, Order No. R3-2017-0028), which was adopted by the Central Coast Regional Water Quality Control Board (Central Coast Water Board) in September 2017. SCRWA operates under the legal authority established in Ordinance No. 2013-01, which regulates wastewater discharges from its service area. SCRWA is currently updating its Sewer Use Ordinance as part of an overall Pretreatment Program update that includes this local limits update.

Local limits development and implementation are part of the SCRWA Pretreatment Program, which involves strategies to control discharge of conventional and toxic pollutants entering the South County Regional Wastewater and Reclamation Facility (SCRWRF) from permitted dischargers (i.e., controllable sources). The objectives of the SCRWA Pretreatment Program are to prevent:

- Interference and/or upset with SCRWRF treatment operations;
- Pass-through of conventional and toxic pollutants;
- Harm to SCRWRF and/or collection system infrastructure;
- Contamination of municipal biosolids; and
- Worker exposure to chemical hazards.

SCRWA last revised its local limits in 2001 and conducted a local limits evaluation in 2013. With changes to its wastewater user base and new NPDES permits issued since the last revision of its local limits, the purpose of this report is to present new local limits developed to protect SCRWRF treatment processes, meet current NPDES effluent limitations, protect biosolids quality, and protect worker health and safety. The major elements of this report include the following:

- Description of the South County Regional Wastewater and Reclamation Facility;
- Local limits development approach;
- Maximum allowable headworks loadings;
- Maximum allowable industrial loadings;
- Public participation; and
- Next steps.

DESCRIPTION OF THE SOUTH COUNTY REGIONAL WASTEWATER AND RECLAMATION FACILITY

SCRWA owns and Jacobs Engineering operates the SCRWRF, which treats domestic, commercial, and industrial wastewater from the Cities of Gilroy and Morgan Hill. The SCRWRF also accepts and treats hauled septage. Septage is discharged to the collection system upstream of the influent sampling location. Wastewater treatment at the SCRWRF, which has an average dry weather design capacity of 8.5 million gallons per day (mgd), includes bar screens, aerated grit removal, pre-anoxic basins, oxidation ditches, and secondary clarifiers. Secondary effluent is disposed of in a system of 37 percolation ponds with a combined area of 395 acres and an average disposal capacity of 11 mgd and a total pond storage capacity of 320 million gallons.

Approximately 2 to 3 mgd of secondary effluent undergoes tertiary treatment for recycled water uses with higher demand typically in the summer months. Tertiary treatment consists of filtration through anthracite media filters and disinfection using ultraviolet light. Tertiary effluent may also be discharged to the Pajaro River under emergency wet weather conditions. During the prior NPDES permit term (Order No. R3-2010-0009), SCRWRF did not discharge to the Pajaro River.

Grit and screenings are disposed of at the Monterey Regional Waste Management District landfill in Marina, California. Solids from primary and secondary clarification are dewatered using belt presses. Biosolids are transported by Synagro for beneficial reuse in Dos Palos.

Planned Upgrades

SCRWA is currently in the planning stages of expanding the SCRWRF to meet the expected future wastewater flows. The planned expansion project will include a parallel treatment system utilizing a membrane bioreactor (MBR) system and improvements to the existing headworks. The headworks improvements include a structure to split flow between the existing oxidation ditches and the MBR treatment system as well as installation of fine screens to protect the membranes.

The MBR treatment system will include parallel bioreactor tanks that will provide biochemical oxygen demand (BOD) and nitrogen removal by oxidation, nitrification, and denitrification in a series of anoxic and aerated zones with internal recycle. Flow will then proceed through hollow-fiber membranes to remove solids. Following membrane treatment, effluent will either be discharged to the percolation ponds or conveyed to disinfection for distribution in the recycled water system or discharged to the river.

Other SCRWRF improvements include new blowers for the MBR treatment system, chemical systems to membrane cleaning, and a new solids handling building that will house new screw presses to dewater biological solids produced by the MBR treatment system.

LOCAL LIMITS DEVELOPMENT APPROACH

The procedures for deriving local limits are described in the United States Environmental Protection Agency (USEPA) *Local Limits Development Guidance*, 2004 (Local Limits Guidance), which include the following steps:

- Identifying pollutants of concern (POCs)
- Collecting sufficient monitoring data
- Deriving the maximum allowable headworks loading (MAHL)
- Calculating the maximum allowable industrial loading (MAIL)
- Developing the allocation method of permitted dischargers

Identifying pollutants of concern and local limits monitoring are addressed in this section of the report. The other steps are discussed in the following sections.

Pollutants of Concern

The first step in local limits development involved identifying POCs that may prevent the SCRWA's Pretreatment Program from achieving its objectives. Local Limits Guidance identifies 15 national POCs that are commonly found in publicly-owned treatment works (POTW) influent, effluent, and biosolids. These national POCs are cadmium, chromium, copper, lead, nickel, zinc, arsenic, cyanide, silver, mercury, molybdenum, selenium, BOD, total suspended solids (TSS), and ammonia as N. In addition to the national POCs, other SCRWF-specific POCs considered for this local limits update include boron, chloride, sodium, sulfate as SO₄, and total dissolved solids (TDS) based on NPDES permit effluent limitations for discharge to the Pajaro River as well as recycled water quality goals. Other potential POCs were considered during the development of the *South County Regional Wastewater Authority Local Limits Sampling Plan* (November 2019) (see **Appendix A**), but were excluded based on an evaluation of historical monitoring data. A summary of the POCs considered for this study are presented in **Table 1**.

Table 1. South County Regional Wastewater Authority Pollutants of Concern

Pollutant	National POC	NPDES Permit Effluent Limitations	Treatment Process Inhibition	Biosolids Restrictions	SCRWRF Design Capacity
Conventional					
Ammonia as N	X	X	X		
Biochemical oxygen demand	X	X	X		X
Boron		X			
Chloride		X	X		
Sodium		X			
Sulfate as SO ₄		X	X		

Total dissolved solids		X		
Total suspended solids	X	X	X	X
Metals				
Arsenic	X		X	X
Cadmium	X		X	X
Chromium	X		X	X
Copper	X		X	X
Lead	X		X	X
Mercury	X		X	X
Molybdenum	X			X
Nickel	X		X	X
Selenium	X			X
Silver	X		X	X
Zinc	X		X	X
Other Toxics				
Cyanide	X		X	

Local Limits Monitoring

In order to develop a technically sound and supportable strategy to control POCs entering into and within the SCRWRf, it is necessary to analyze water quality data. Three general areas that are monitored for local limits development include the following:

- Collection system
- SCRWRf
- Biosolids

First, it is important to determine the distribution of controllable and non-controllable pollutant sources. Uncontrollable pollutant sources (non-industrial users such as residential, commercial, inflow and infiltration, drinking water, and storm water) typically contribute most of the wastewater flow to a POTW, but generally contain lower concentrations when compared to industrial wastewater, which are controllable sources. SCRWRf conducted pollutant sampling at one collection system site, which services residential and commercial users, but does not include any industrial users, to develop data necessary to characterize pollutant levels from uncontrollable sources.

Second, in-plant removal efficiencies are required to calculate the maximum pollutant loads that can be accepted at the headworks and effectively treated without overloading SCRWRf design treatment capacities, upsetting treatment processes, or exceeding effluent water or biosolids quality limitations. This information was developed by collecting water quality data at the SCRWRf influent and final effluent to calculate appropriate in-plant removal efficiencies.

Finally, biosolids quality must be assessed because biosolids disposal regulations require different levels of biosolids quality depending on disposal practices. Biosolids must be monitored to determine the presence of any POCs and to derive local limits that will protect biosolids handling processes and quality. Biosolids quality data were not collected as part of the Local Limits Monitoring Program. Instead, data collected by SCRWF as part of its regular biosolids monitoring requirements were used.

The *Local Limits Sampling Plan* provides detailed information about SCRWA's Local Limits Monitoring Program. Data collected in April 2020 during local limits monitoring were supplemented with relevant monitoring data collected between May 2017 and April 2020 by SCRWA as part of its on-going monitoring program and requirements.

Local Limits Monitoring Results

All local limits monitoring sample analyses were conducted by Alpha Analytical Laboratories. Laboratory reports included analytical results, reporting limits (RLs), and method detection limits (MDLs) along with all laboratory quality assurance/quality control (QA/QC) results. Results below the RL, but above the MDL were qualified as detected but not quantified (DNQ), or "J-flagged". Results below the MDL were qualified as "non-detect". Although they were estimated, all monitoring results qualified as "J-flagged" were included in local limits derivation calculations. Summaries of analytical results are presented in **Appendix C**. Original analytical laboratory reports are available upon request.

QA/QC analyses were conducted to ensure analytical data quality. For the Local Limits Monitoring Program, the following QA/QC analyses were initiated:

- Field controls (field log, clean sampling and handling techniques, field blanks, field duplicates)
 - Laboratory controls (laboratory duplicates, standard laboratory calibration procedures, matrix spikes/matrix spike duplicates, laboratory control standards, method blanks)
-
- Sample chain-of-custody
 - Data verification

There was a minor QA/QC issue with effluent copper sampling during the local limits monitoring. This is discussed in **Appendix E**.

Additional Pollutants of Concern Screening

As discussed in the *Local Limits Sampling Plan*, potential POCs were screened using a step included in USEPA's *Guidance Manual on the Development and Implementation of Local Discharge Limitations under the Pretreatment Program* (December 1987) (1987 Local Limits Guidance). Boron, sulfate as SO₄, and sulfide as S were not screened for local limits development in the *Local Limits Sampling Plan* because there were insufficient historical data for these pollutants. These pollutants were sampled during the Local Limits Monitoring Program in order to conduct the screening. The screening step criteria used to

determine if these pollutants needed to undergo a headworks loading analysis or local limit development are as follows:

- **Criterion 1.** The maximum concentration of the pollutant in the effluent is more than one-half the allowable effluent concentration required to meet water quality criteria/standards or the maximum sludge concentration is more than one-half the applicable biosolids criteria guidelines; or
- **Criterion 2.** The maximum concentration of the pollutant in a grab sample from the influent is more than one-half the inhibition threshold; or
- **Criterion 3.** The maximum concentration of the pollutant in a composite sample from the influent is more than one-fourth the inhibition threshold; or
- **Criterion 4.** The maximum concentration of the pollutant in the influent is more than 1/500th of the applicable biosolids use criteria.

Pollutants that did not meet the screening criteria above did not undergo further headworks loading analysis or local limits development because they were detected at levels significantly below any applicable environmental and/or operational restrictions or limits. A summary of the screening for these pollutants is presented in **Table 2**.

Based on this screening as well as the screening conducted during the development of the *Local Limits Sampling Plan*, local limits will be updated and/or developed for the national POCs, chloride, sodium, and TDS.

Table 2. Pollutants of Concern Screening

Pollutant	Screening Result
Boron	The maximum effluent concentration (0.32 mg/L) is less than one-half of the most stringent NPDES permit effluent limitation (1.0 mg/L). A local limit will not be developed for this pollutant at this time.
Sulfate as SO ₄	The maximum effluent concentration (65 mg/L) is less than one-half of the most stringent NPDES permit effluent limitation (150 mg/L). A local limit will not be developed for this pollutant at this time.
Sulfide as S	The maximum influent concentration (5.6 mg/L) is less than one-half of the treatment process inhibition levels (25 mg/L). A local limit for this pollutant will not be developed at this time.

Data Analysis

When possible, data were statistically analyzed using regression-on-order statistics (ROS), which is a method that determines summary statistics for data sets that have non-detect data. The ROS method develops probability plotting positions for each data point (detect and non-detect values) based on an ordering of the data. The log-transform of the data is regressed and fitted with a least squares line to probability plotting positions. Non-detect data points are assigned values for calculation of summary statistics based on their probability plotting positions and the regression line equation. Summary statistics are calculated based on the detected data points and “filled-in” non-detect values. Variance summary statistics are calculated using a Tukey-Jackknife algorithm, which sequentially

removes one point from the dataset, runs the analysis, and calculates the variance estimators as the average of each of the “n” runs of data.

The ROS method is limited if there are insufficient data (e.g., less than 20 percent detected data, too few data points) to perform the analysis. This approach is found to provide only small errors for major summary statistics parameters (mean, median, standard deviation, and interquartile range) when less than 100 percent of the data are detected. It should be noted that unless all data are detected, the ROS method is only an estimation of the data.

In cases where the ROS method could not be used, a surrogate was used to substitute for non-detect results. The three surrogates commonly used (per Local Limits Guidance) are the reporting limit, zero, and one-half the reporting limit. The most conservative approach is to select a surrogate equal to the reporting limit, which assumes that the pollutant concentration is always higher than the actual value. On the other hand, if the surrogate is equal to zero, it assumes that the pollutant concentration is likely lower than the actual value. For this derivation of local limits, the one-half of the MDL is used for non- detect data when there were insufficient detected data to use the ROS method.

MAXIMUM ALLOWABLE HEADWORKS LOADINGS

The MAHL must be determined for each POC before developing a local limit. The MAHL is the maximum pollutant loading that may be received at the SCRWRP headworks and not have the potential to negatively impact the SCRWA Pretreatment Program objectives. In this section, the following information is presented:

- Environmental and operational restrictions driving MAHL derivation
- Flow measurements
- Removal efficiency calculations
- Allowable headworks loading calculations
- Maximum allowable headworks loading
- Need for local limit

Environmental and Operational Restrictions Driving MAHL Derivation

Four major factors serve as the basis for MAHL development. These include NPDES permit effluent limitations, biosolids disposal restrictions, treatment process inhibition levels, and treatment design capacity. These restrictions are described in this section.

NPDES permit effluent limitations

SCRWA's NPDES permit provides numeric restrictions on effluent discharges for ammonia, BOD, boron, bromodichloromethane, chloride, chlorodibromomethane, copper, lead, nitrate, sodium, sulfate, TSS, TDS, and trihalomethanes. As determined the development of the *Local Limits Sampling Plan*, bromodichloromethane, chlorodibromomethane, nitrate, and trihalomethanes were not considered POCs for this study. For all other pollutants, the most stringent effluent limitations were used for local limits development to protect against exceedance of NPDES permit effluent limitations. SCRWA's NPDES permit restrictions are presented in Appendix B of this report.

Biosolids restrictions

SCRWA currently disposes of biosolids by Synagro for beneficial reuse in Dos Palos. Restrictions for metals under 40 CFR Part 503 apply for biosolids disposed of through land application or composting. Waste disposal, which includes biosolids, is also subject to hazardous waste requirements for metals, pesticides, and polychlorinated biphenyls (PCBs) under Title 26 of the California Code of Regulations (CCR).

A review of historical data and pollutant screening conducted during the development of the *Local Limits Sampling Plan* indicated that pesticides and PCBs could be excluded from further consideration for local limits development in this effort. The biosolids disposal restrictions used in the development of MAHLs are presented in Appendix B of this report.

Treatment process inhibition

Treatment process inhibition refers to pollutant levels that will interfere with biological, chemical, and/or physical processes of wastewater treatment, thereby resulting in reduced facility performance and/or upset. Although the SCRWRF does not have activated sludge treatment, it does have biological treatment through its oxidation ditches. As a conservative assumption to protect the SCRWRF, activated sludge inhibition levels from the Local Limits Guidance, which are presented in Appendix B, were used for this analysis.

Treatment design capacity

For ammonia as N, BOD, TSS, it is necessary to consider the design capacity of the SCRWRF in formulating the MAHLs. For this analysis, the SCRWRF average daily dry weather design capacities were 325 mg/L and 295 mg/L for BOD and TSS, respectively. There is no design capacity loading for ammonia.

Flow Measurements

Flow measurements are used to calculate pollutant mass loadings. The following flow information is necessary to calculate pollutant loadings:

- SCRWRF influent and effluent flow
- Industrial user flow
- Biosolids volume for disposal

The May 2017 to April 2020 average daily influent and effluent flows were 6.35 mgd and 4.97 mgd, respectively. When calculating pollutant loads, average daily flow data corresponding to the pollutant sample date was used. From the 2019 Annual Pretreatment Report, the estimated industrial user flow was 0.21 mgd. From the 2019 Annual Biosolids Report, an average daily mass of biosolids composted at Dos Palos was 13,700 pounds per day dry weight with an average of 14.8% solids.

Removal Efficiency Calculations

Removal efficiency through the SCRWRF, or specific unit within the treatment process, is defined as the fraction (or percent) of the pollutant that is removed. Local Limits Guidance identifies several methods of calculating removal efficiencies, including the average daily removal efficiency, mean removal efficiency, and decile methods.

In this study, removal efficiencies were calculated using the mean removal efficiency method. This method was used in lieu of the decile method because there are too few pair removal efficiencies available to calculate removal efficiencies using the decile method. The mean removal efficiency method is disadvantageous in relation to the decile method because it does not indicate how often the derived removal efficiency is achieved. Similarly, there were too few paired data to use the average daily removal method. The mean removal efficiency method is still useful because it allows for the use of historical data that may not have been collected based on the hydraulic residence time.

Total SCRWRF removal efficiencies were calculated as a change in loads as opposed to change in concentrations to account for the difference in influent and final effluent flows and to credit water recycling efforts. The total removal efficiency was calculated using the following equation:

$$= \frac{R_{\text{SCRWRF}}}{L_{\text{IN}}} \times 100\%$$

Where:

R_{SCRWRF} = Pollutant removal efficiency through the SCRWRF

L_{IN} = Average influent pollutant load [lb/day]

L_{FE} = Average final effluent pollutant load [lb/day]

In general, the following guidelines are used when calculating removal efficiencies:

1. Calculated removal efficiencies were cross-checked with removal efficiency ranges provided in the Local Limits Guidance to check that realistic values are used.
2. Special consideration is given to instances when the concentrations of pollutants appear to increase during the treatment process. In these situations, negative removal efficiencies were used to derive local limits. This approach provides a conservative assessment of treatment performance as well as an additional safety factor to protect the SCRWRF.
3. SCRWA conducts regular sampling of its influent and final effluent for pollutants for which it has NPDES permit effluent limitations. Other priority pollutants are sampled, at a minimum, on an annual basis. Use of historical data along with data collected through the Local Limits Monitoring Program provides for a more robust calculation of removal efficiencies. This approach also characterizes seasonal variations in SCRWRF performance.

Removal efficiencies through primary treatment also need to be considered in developing allowable headworks loadings (AHLs) for treatment process inhibition-based restrictions. However, the SCRWRF does not have typical primary treatment (e.g., primary clarification). In developing AHLs based on treatment process inhibition for this study, the removal efficiency through primary treatment was assumed to be zero.

Allowable Headworks Loading Calculations

Prior to calculating a local limit, it is necessary to calculate AHLs for each POC. The AHL is the estimated pollutant loading that can be received at the headworks without causing the SCRWRF to violate a particular operational restriction or environmental criterion. AHLs are calculated for each type of restriction (NPDES permit effluent limitations, treatment design capacity, treatment process inhibition levels, and biosolids disposal

restrictions). The calculation procedures shown below are based on the methodologies and equations in the Local Limits Guidance. Depending on the units used, conversion factors are applied to the calculations.

NPDES Permit Effluent Limitations

The AHL based on NPDES permit effluent limitations was calculated using the following equation to prevent pass-through:

$$= \frac{8.34 \times \quad \times}{\quad} 1$$

Where:

AHL_{NPDES} = NPDES permit-based AHL [lb/day]

C_{NPDES} = NPDES permit effluent limitation [mg/L]

Q_{FE} = Average daily SCRWRf final effluent flow rate [mgd]

R_{SCRWRf} = Pollutant removal efficiency through the SCRWRf

SCRWRf Treatment Design Capacity

The AHL based on treatment design capacity was calculated using the following equation:

$$= 8.34 \times \quad \times$$

Where:

AHL_{DESIGN} = SCRWRf design capacity-based AHL [lb/day]

C_{DESIGN} = SCRWRf design capacity [mg/L]

Q_{IN} = Average daily SCRWRf influent flow rate [mgd]

Treatment Process Inhibition

The AHL based on treatment process inhibition was calculated using the following equation:

$$= \frac{8.34 \times \quad \times}{1 - \quad}$$

Where:

AHL = Treatment process inhibition-based AHL [lb/day]

C_{AS} = Activated sludge inhibition concentration [mg/L]

Q_{IN} = Average daily SCRWRF influent flow rate [mgd]

R_P = Pollutant removal efficiency through primary treatment (assumed to be zero)

Biosolids Restrictions

Both 40 CFR Part 503 and CCR Title 22 biosolids restrictions apply to the disposal of biosolids generated at the SCRWRF.

The AHL based on 40 CFR Part 503 biosolids restriction is calculated using the following equation:

$$= \frac{10^{-6} \times \quad \times}{\quad}$$

Where:

AHL_{CFR} = 40 CFR Part 503 biosolids restriction-based AHL [lbs/day]

C_{CFR} = 40 CFR Part 503 numeric biosolids restrictions [mg/kg dry weight]

$V_{BIOSOLIDS}$ = Average daily volume of biosolids disposed [lbs/day dry weight]

R_{SCRWRF} = Pollutant removal efficiency through the SCRWRF

Biosolids cannot be hazardous waste if they are to be disposed of in non-hazardous waste facilities (e.g., composted, land applied). CCR Title 22 biosolids restrictions may apply either to conservative or non-conservative pollutants. However, non-conservative pollutants were evaluated and excluded from this study. For conservative pollutants, the AHL based on CCR biosolids restriction is calculated using the following equation:

$$= \frac{10^{-6} \times \quad \times}{\quad \times}$$

Where:

AHL_{CCR} = CCR Title 22 biosolids restriction-based AHL [lb/day]

C_{CCR} = CCR Title 22 numeric biosolids restrictions [mg/kg wet weight]

$V_{BIOSOLIDS}$ = Average daily volume of biosolids disposed [lb/day dry weight]

PS = Percent solids at disposal

R_{SCRWRF} = Pollutant removal efficiency through the SCRWRF

Maximum Allowable Headworks Loading

Following the calculation of the applicable AHLs for each POC, the minimum AHL for each POC is designated as the MAHL, or the maximum influent loading that can be accepted at the SCRWRf to ensure compliance with all operational restrictions and/or environmental criteria. The MAHLs are presented in **Table 3**.

Table 3. South County Regional Wastewater Authority Maximum Allowable Headworks Loadings

Pollutant	MAHL (lb/day) ⁽¹⁾	Basis for MAHL
<i>Conventional</i>		
Ammonia as N	10,000	NPDES Permit Effluent Limitation
Biochemical oxygen demand (BOD)	17,000	SCRWRf Design Capacity
Chloride	10,000	NPDES Permit Effluent Limitation
Sodium	8,700	NPDES Permit Effluent Limitation
Total dissolved solids (TDS)	55,000	NPDES Permit Effluent Limitation
Total suspended solids (TSS)	16,000	SCRWRf Design Capacity
<i>Metals (Total Recoverable)</i>		
Arsenic	1.8	40 CFR Part 503 Biosolids Disposal
Cadmium	0.60	40 CFR Part 503 Biosolids Disposal
Chromium	50	CCR Title 22 Biosolids Disposal
Copper	21	40 CFR Part 503 Biosolids Disposal
Lead	1.1	NPDES Permit Effluent Limitation
Mercury	0.23	40 CFR Part 503 Biosolids Disposal
Molybdenum	1.5	40 CFR Part 503 Biosolids Disposal
Nickel	9.0	40 CFR Part 503 Biosolids Disposal
Selenium	1.6	40 CFR Part 503 Biosolids Disposal
Silver	51	CCR Title 22 Biosolids Disposal
Zinc	16	Treatment Process Inhibition
<i>Other Toxics</i>		
Cyanide	5.3	Treatment Process Inhibition

(1) Based on average influent and effluent flow rates of 6.35 mgd (May 2017 to April 2020).

Need for Local Limit

Although MAHLs were calculated for each POC, there may not be a need to develop a local limit for the pollutant. The following 2004 Local Limits Guidance evaluation and exclusion steps are intended to determine if local limits are necessary for each POC. A local limit is not necessary if the following criteria are met:

- The average influent loading of the pollutant is less than 60 percent of the MAHL;
- The maximum daily influent loading of the pollutant is less than 80 percent of the MAHL any time in the 12-month period preceding the analysis; or
- Monthly average influent loading is less than 80 percent of the average design capacity for BOD, TSS, and ammonia as N during any one month in the 12-month period preceding the analysis.

A comparison of the MAHLs with the May 2017 to April 2020 average and maximum influent loadings for each POC, except ammonia as N, BOD, and TSS, is presented in **Table 4**.

Table 4. Comparison of the May 2017 to April 2020 South County Regional Wastewater and Reclamation Facility Influent Loadings to the Maximum Allowable Headworks Loadings

Pollutant	MAHL (lb/day) ⁽¹⁾	Average Influent Loading (lb/day)	Average Influent % of MAHL ⁽²⁾	Maximum Influent Loading (lb/day)	Maximum Influent % ⁽³⁾ of MAHL
Conventional					
Chloride	10,000	12,000	120%	15,000	170%
Sodium	8,700	7,800	90%	9,000	103%
Total dissolved solids (TDS)	<u>55,000</u>	<u>52,000</u>	95%	<u>69,000</u>	130%
Metals (Total Recoverable)					
Arsenic	1.8	0.086	4.8%	0.14	7.8%
Cadmium	0.60	0.012	2.0%	0.025	4.2%
Chromium	50	0.36	0.7%	0.63	1.3%
Copper	21	5.7	27%	11	52%
Lead	1.1	0.093	8.5%	0.20	18%
Mercury	0.23	0.0056	2.4%	0.0085	3.7%
Molybdenum	1.5	0.12	8.0%	0.19	13%
Nickel	9.0	0.36	4.0%	0.59	6.6%
Selenium	1.6	0.057	3.6%	0.096	6.0%
Silver	51	0.014	0.03%	0.026	0.1%
Zinc	<u>16</u>	<u>12</u>	75%	<u>26</u>	160%
Other Toxics					
Cyanide	<u>5.3</u>	<u>0.13</u>	<u>2.5%</u>	<u>0.33</u>	<u>6.2%</u>

(1) Based on average influent and effluent flow rates of 6.35 mgd (May 2017 to April 2020).

(2) Percentages in bold indicate average influent loads that exceed 60 percent of the MAHL.

(3) Percentages in bold indicate maximum influent loads that exceed 80 percent of the MAHL.

For ammonia as N, BOD, and TSS, the 2004 Local Limits Guidance recommends using a monthly average comparison of influent loading to the MAHL because POTWs are expected to have capacity to consistently treat a design conventional pollutant load to acceptable levels for discharge. The May 2017 to April 2020 maximum monthly average influent loads for ammonia as N, BOD, and TSS and percentages of the respective MAHLs are presented in **Table 5**.

Table 5. May 2017-April 2020 Maximum Monthly Average Influent Loads for Ammonia as N, BOD, and TSS

Pollutant	MAHL (lb/day)	Maximum Monthly Average Influent Load (lb/day)	Maximum Monthly Average Influent % of MAHL ⁽¹⁾
Ammonia as N	10,000	2,500	25%
Biochemical oxygen demand (BOD)	17,000	22,000	130%
Total suspended solids (TSS)	16,000	19,000	120%

(1) Percentages in bold indicate maximum monthly average influent loadings that exceed 80 percent of the MAHL.

The following pollutants did not meet the exclusion criteria listed above, indicating that the derivation and implementation of local limits is appropriate and necessary:

Conventional

BOD
Chloride
Sodium
TDS
TSS

Metals (total recoverable)

Zinc

In addition to these pollutants, SCRWA will also update its local limits for the other national POCs that did not meet the exclusion criteria to protect its collection system and the SCRWRF.

MAXIMUM ALLOWABLE INDUSTRIAL LOADINGS

From the MAHL, the MAIL and subsequent local limit are derived. The MAIL is the maximum pollutant loading from permitted users that may enter the SCRWRF without having the potential to negatively impact SCRWA's Pretreatment Program objectives. In this section, the following information is presented:

- MAIL calculations procedures
- Derivation results
- MAIL allocation methods

MAIL Calculation Procedures

The MAIL, or the maximum pollutant load that can come from permitted sources, is obtained from the MAHL by reducing the MAHL by a safety factor and subtracting the existing loading from uncontrollable sources (i.e., non-permitted sources). The MAIL is calculated using the following equation:

$$MAIL = (1 - SF) \times MAHL - (8.34 \times Q_N \times C_N)$$

Where:

MAIL = Maximum allowable industrial loading for pollutant [lb/day]

SF = Safety factor

MAHL = Maximum allowable headworks loading [lb/day]

Q_N = Average non-permitted flow rate [mgd]

C_N = Average non-permitted pollutant concentration [mg/L]

As indicated in the equation above, Local Limits Guidance suggests reserving a portion of the MAIL as a safety factor to account for variability in data, quality of data used in MAHL and MAIL derivations, and potential for slug loadings. Local Limits Guidance also states that "as a general rule, a minimum safety factor of 10% of the maximum allowable headworks loading is usually necessary to adequately address [these] issues." Unless otherwise noted, a safety factor of 10 percent is used in the development of MAILs presented below.

Derivation Results

The following section provides the results of MAIL derivation and collection system-based numeric limits.

MAIL Calculation Results

For this analysis, MAILs were derived using a spreadsheet model based upon the methodologies provided in the Local Limits Guidance for each pollutant. The MAIL derivations are summarized in **Table 6** and presented in **Appendix D**. The assumptions used in the local limits derivations are summarized in **Appendix E**. These are the proposed local limits expressed as the MAIL in pounds per day (lb/day).

Table 6. South County Regional Wastewater and Reclamation Facility Maximum Allowable Industrial Loadings/Local Limits

Pollutant	Maximum Allowable Industrial Loading (lb/day) ⁽¹⁾
<i>Conventional</i>	
Ammonia as N	6,300
Biochemical oxygen demand (BOD)	1,100
Chloride	5,100
Sodium	4,300
Total dissolved solids (TDS)	17,000
Total suspended solids (TSS)	3,800
<i>Metals (Total Recoverable)</i>	
Arsenic	1.5
Cadmium	0.53
Chromium	45
Copper	15
Lead	0.87
Mercury	0.21
Molybdenum	1.3
Nickel	7.8
Selenium	1.4
Silver	46
Zinc	4.1
<i>Non-Conservative Pollutants</i>	
Cyanide	4.7

(1) Based on average influent and effluent flow rates of 6.35 mgd (May 2017 to April 2020).

Collection System-Based Limits

Collection system-based numeric limits, which are intended to address explosivity, corrosivity, flow obstruction, temperature, and headspace toxicity, apply directly to users and do not involve calculation of local limits. As part of its local limits update, SCRWA is

also currently in the process of updating its Sewer Use Ordinance. References to these collection system-based limits may change in the updated Sewer Use Ordinance.

The General Pretreatment Regulations (40 CFR Part 403.5(b)(1)) prohibit discharge of pollutants that will cause a fire or explosion hazard in the collection system. SCRWA currently prohibits these discharges in Section 2.1(A) of Ordinance 2013-01. A resource for closed cup flashpoint values is the National Institute for Occupational Safety and Health (NIOSH) chemical database (<http://www.cdc.gov/niosh/npg>).

The General Pretreatment Regulations (40 CFR Part 403.5(b)(2)) specify a minimum industrial discharge pH limit of 5.0 to prevent corrosion. Federal regulations (40 CFR Part 261.22(a)(1)) also specify that the maximum discharge pH limit should be 12.5 to prevent wastewater from being classified as hazardous waste. SCRWA currently implements a minimum discharge pH of 6.5 and a maximum discharge pH of 11.0 in Section 2.1(C) of Ordinance 2013-01.

The General Pretreatment Regulations (40 CFR Part 403.5(b)(3)) prohibit discharge of solid or viscous pollutants that will obstruct flows and interfere with wastewater flows in the collection system or at the SCRWRF. SCRWA currently implements this prohibition in Section 1.2(B) of Ordinance 2013-01.

The General Pretreatment Regulations (40 CFR Part 403.5(b)(4)) prohibit the discharge of any pollutant, including oxygen demanding pollutants (e.g., BOD) released in a discharge at a flow rate and/or pollutant concentration which will cause interference in the collection system or at the SCRWRF. SCRWA currently implements this prohibition in Section 1.2(J) of Ordinance 2013-01.

The General Pretreatment Regulations (40 CFR Part 403.5(b)(5)) prohibit the discharge of heat in amounts which will inhibit biological activity at the SCRWRF resulting in interference. In no situation should heat be discharged in quantities such that the temperature at the SCRWRF exceeds 104°F (40°C). SCRWA currently implements this prohibition in Section 1.2(I) of Ordinance 2013-01.

The General Pretreatment Regulations (40 CFR Part 403.5(b)(6)) prohibit the discharge of petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through. SCRWA currently implements this prohibition in Section 1.2(O) of Ordinance 2013-01.

General Pretreatment Regulations (40 CFR Part 403.5(b)(7)) prohibit discharge of pollutants that can lead to the accumulation of toxic gases, vapors, or fumes in the collection system and/or at the SCRWRF in a quantity that may cause acute worker health and safety problems. SCRWA currently implements this prohibition in Section 1.2(E) of Ordinance 2013-01. A resource for fume toxicity screening levels is the NIOSH chemical database (<http://www.cdc.gov/niosh/npg>).

The General Pretreatment Regulations (40 CFR Part 403.5(b)(8)) prohibit the discharge of trucked or hauled pollutants except at discharge points designated by a POTW.

SCRWA, which allows trucked or hauled waste with written approval, currently implements this prohibition in Section 1.2(Q) and Section 2.10 of Ordinance 2013-01.

MAIL Allocation Methods

MAIL allocation is necessary for developing local limits and permitting users under the Pretreatment Program. Local Limits Guidance specifies the following four types of numeric local limits allocation strategies:

- Uniform local limits
- Local limits by contributory flow
- Facility-specific local limits by mass proportion
- Creative allocation

Uniform Local Limits

For certain parameters, it may be desirable to calculate uniform numeric discharge concentration restrictions that are intended to apply to all permitted users. This can be achieved by simply assigning the MAIL concentration as a local limit. In general, this is the most restrictive MAIL allocation approach, but the easiest to administer.

The MAIL can be converted to a uniform concentration using the following equation:

$$= \frac{\text{MAIL}}{8.34 \times Q}$$

Where:

MAIL_{CONC} = MAIL expressed as a concentration [mg/L]

MAIL = MAIL expressed as a load [lb/day]

Q_P = Average daily flow rate from all permitted users [mgd]

Local Limits by Contributory Flow

The derivation of contributory flow local limits for targeted facilities is similar to the uniform local limits approach except that the number of permitted users affected is limited to those for which it has been established that the given POC is present at levels higher than background levels. In other words, only dischargers that are known to or suspected of being significant contributors of the given pollutant would be subjected to the limit. For all remaining permitted sources, it is assumed that their discharges are non-industrial in character.

Contributory flow-based local limits are calculated from the MAIL as follows:

$$= \frac{\text{MAIL} - 8.34 \times Q_{\text{background}}}{8.34 \times (Q_{\text{targeted}} + Q_{\text{background}})}$$

Where:

LL_C = Contributory flow-based limit [mg/L]

MAIL = Maximum allowable industrial loading of pollutant [lb/day]

Q_{PN} = Average total permitted user flow rate for controlled sources not discharging pollutant [mgd]

Q_N = Average non-permitted user flow rate [mgd]

C_N = Average non-permitted user pollutant concentration [mg/L]

Facility-Specific Local Limits by Mass Proportion

Facility-specific local limits by mass proportion are developed by allocating the MAIL for each POC in proportion to the existing loadings from each user or at the discretion of the regulating agency. This approach enables dischargers with higher strength effluent to receive more achievable limits, while providing lower strength dischargers with limits more in line with the characteristics of their own discharges. The methodology for derivation of facility-specific local limits by mass proportion is presented in the Local Limits Guidance.

Creative Allocation

In general, after the MAIL has been calculated, a POTW has flexibility in allocating the loading among its permitted users as long as a safety factor is maintained and the POTW accounted for all allocations, and the allocation is publicly noticed and adopted.

MAIL Allocation

SCRWA proposes to adopt its local limits using the uniform local limits allocation method. The uniform local limits, which are based on the MAILs presented in **Table 6**, are presented in **Table 7**. For pollutants where the calculated local limit is higher, SCWRA will maintain its existing local limit. SCWRA will reduce the local limits for BOD, arsenic, chromium, and lead and introduce new local limits for chloride, sodium, and TDS. SCWRA will not implement a local limit for ammonia, molybdenum, and selenium at this time because the overall capacity usage is low compared to the MAHL. SCWRA will re-evaluate the need for local limits for these pollutants in the future if needed. SCRWA will continue to implement its local limit for oil and grease (non-polar) to protect the collection system.

In addition to the updated local limits proposed in **Table 7**, SCRWA will maintain the existing requirements for total identified chlorinated hydrocarbons and toxic organic compounds (i.e., priority pollutants defined by USEPA). The pollutant screening conducted during the development of the *Local Limits Sampling Plan* evaluated each of the pollutants that comprise of total identified chlorinated hydrocarbons and toxic organic compounds individually based on NPDES permit effluent limitations, treatment process inhibition, and biosolids restrictions. The pollutant screening indicated that these pollutants were not present in concentrations (most pollutants were not detected) that

would warrant the development of a local limit. SCRWA regularly monitors for these pollutants as part of its NPDES permit. If future local limits evaluations or higher concentrations of these pollutants are observed during regular monitoring, SCRWA will re-evaluate the need to implement local limits for these pollutants.

Table 7. Proposed South County Regional Wastewater Authority Uniform Local Limits

Pollutant	Current Local Limit (mg/L)	Proposed Local Limit (mg/L) ⁽¹⁾
<i>Conventional</i>		
Biochemical oxygen demand (BOD)	1,000	610
Chloride	–	2,900
Oil & Grease	100	100 ⁽²⁾
pH (Std. Units)	6.5 – 11	6.0 – 11.0
Sodium	–	2,500
Temperature	40° C	⁽³⁾
Total dissolved solids (TDS)	–	9,500
Total suspended solids (TSS)	1,000	1,000 ⁽²⁾
<i>Metals (Total Recoverable)</i>		
Arsenic	1.1	0.88
Cadmium	0.01	0.1 ⁽²⁾
Chromium	5.1	5.1 ⁽²⁾
Copper	1.8	1.8 ⁽²⁾
Lead	1.6	0.50
Mercury	0.03	0.3 ⁽²⁾
Nickel	2.7	2.7 ⁽²⁾
Silver	4.2	4.2 ⁽²⁾
Zinc	1.4	1.4 ⁽²⁾
<i>Organics</i>		
Total identifiable chlorinated hydrocarbons	Trace	Trace
Toxic organic compounds	Trace	Trace
<i>Non-Conservative Pollutants</i>		
Cyanide	1.8	1.8 ⁽²⁾

(1) The proposed uniform local limit will be adopted as a daily maximum concentration.

(2) SCRWA will maintain the current local limit for this pollutant.

(3) Ordinance No. 2013-01 currently includes a local limit for temperature of 40°C. However, this temperature local limit should not be included in the local limits table in the ordinance because Section 2.1.I of the ordinance indicates that wastewater should not cause in the

temperature at the SCRWRF to exceed 40°C. SCWRA should not otherwise have a temperature limit for discharges from users.

PUBLIC PARTICIPATION

General Pretreatment Regulations encourage public participation by requiring public notices or hearings for Pretreatment Program approval, removal credits, program revisions, local limits development and revisions, and permitted users in significant non-compliance. For a substantial change to the Pretreatment Program, such as the development less stringent local limits or removal of existing local limits, SCRWA is required to notify the Central Coast Water Board of its desire to modify its program and its basis for the changes. The requested modifications cannot be implemented until SCRWA receives approval from the Central Coast Water Board of the modifications. For non-substantial changes to the Pretreatment Program, such as the development of new local limits or more stringent local limits, SCRWA is required to notify the Central Coast Water Board of its desire to modify its program and its basis for the changes at least forty-five (45) days prior to implementation of the modifications. If the Central Coast Water Board does not notify the SCRWA within 45 days of its decision to approve or deny the modification or to treat the modification as substantial, SCRWA can implement the non-substantial modifications.

Federal regulations [40 CFR Part 403.5(c)(3)] require the POTWs to notify permitted users and other affected parties and provide them with an opportunity to respond to changes in local limits. The federal regulations do not specify the exact public notice process, but USEPA recommends that the POTWs notify affected parties in the local newspaper when the new local limits are drafted. This public comment period can be open while the proposed local limits are being submitted to the Central Coast Water Board for initial review or, the POTW can wait until after it receives comments from the Central Coast Water Board. During the comment period, the public may present technical challenges to the rationale for a particular local limit. To prepare for potential challenges, a POTW should thoroughly document its local limits development process.

For this local limits development process, SCRWA will provide a public notice and public comment period after the proposed local limits are submitted to the Central Coast Water Board for initial review.

NEXT STEPS

The local limits updated and developed and discussed above are part of a dynamic process that includes periodic review and update as necessary. Local Limits Guidance recommends that POTWs conduct regular monitoring as part of the local limits evaluation process. The recommended monitoring frequencies are presented in **Table 8**. It should be noted that more frequent monitoring may be required through other permits and/or regulations.

Table 8. Local Limits Monitoring Program – Recommended Ongoing Monitoring Frequency

Location	POCs with Local Limits ⁽¹⁾	Other POCs with Regulatory or Operational Restrictions ⁽²⁾
Collection System	Annually	Annually
SCRWRF Influent	Semiannually	Annually
SCRWRF Final Effluent	Semiannually	Annually
Biosolids Disposal Point	Annually	Annually

(1) This refers to POCs that have proposed local limits (i.e., Table 6 POCs).

(2) This refers to POCs that were excluded from MAHL development (i.e., Table 4 POCs).

Future circumstances may again create a need to update SCRWA's MAILs to allow for the compliance with environmental and operational restrictions. Such circumstances may include the following:

- Significant changes in the SCRWA permitted user base;
- Significant changes in the discharge characteristics of existing users;
- Significant changes in the environmental and/or NPDES permit regulations applicable to SCRWA;
- Future facility operational difficulties, discharge compliance difficulties, or biosolids disposal compliance difficulties from any pollutants known or suspected to be significantly contributed from permitted sources;
- Future facility infrastructure upgrades that can affect wastewater and/or biosolids treatment processes and quality; and/or
- Difficulties in meeting local limits without any corresponding facility operational challenges, discharge compliance challenges, or biosolids disposal compliance challenges.

SCRWA intends to adopt the proposed local limits presented in **Table 7**.

SCRWA will also update its Sewer Use Ordinance and submit that with this local limits study to the Central Coast Water Board for approval. Upon receiving approval, SCRWA will implement the updated local limits in its wastewater discharge permits.

Local Limits Sampling Plan (November 2019)

NOVEMBER 2019

**SOUTH COUNTY REGIONAL WASTEWATER
AUTHORITY**

Local Limits Sampling Plan

Prepared by

LARRY WALKER ASSOCIATES



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INTRODUCTION

The South County Regional Wastewater Authority (SCRWA) is a joint power authority that was established to manage wastewater treatment for the Cities of Gilroy and Morgan Hill. SCRWA owns and operates the South County Regional Wastewater and Reclamation Facility (SCRWRF), which provides up to tertiary treatment for wastewater collected from the Cities of Gilroy and Morgan Hill. The SCRWRF is regulated under a National Pollutant Discharge Elimination System (NPDES) permit (CA0049964, Order No. R3-2017-0028), which was adopted by the Central Coast Regional Water Quality Control Board in September 2017. Provision VI.C.5.b of the NPDES permit requires that SCRWA implement a Pretreatment Program to regulate wastewater discharges from industrial and other users. The objectives of the Pretreatment Program are to prevent:

- Interference and/or upset with SCRWRF treatment operations;
- Pass-through of conventional and toxic pollutants;
- Harm to the sanitary sewer system or SCRWRF infrastructure;
- Contamination of municipal biosolids; and
- Worker exposure to chemical hazards.

The development, implementation, and periodic review/update of local discharge limitations (local limits) are a critical part in the strategy to control discharge of conventional and toxic pollutants from entering the sanitary sewer system and wastewater treatment plant. Local limits are periodically evaluated, and revised as necessary, to respond to changes in treatment infrastructure or operations, regulations, or industrial user base. The procedure for developing and updating local limits is described in Local Limits Development Guidance, USEPA, 2004 (2004 Local Limits Guidance).

This sampling plan is based on fulfilling data requirements specified in the 2004 Local Limits Guidance to update the local limits for SCRWA. The major elements of this sampling plan include the following:

- South County Regional Wastewater and Reclamation Facility description;
- Local limits development approach;
- Proposed local limits sampling plan;
- Quality assurance/quality control; and
- Local limits derivation.

SOUTH COUNTY REGIONAL WASTEWATER AND RECLAMATION FACILITY DESCRIPTION

The SCRWRF, which has an average dry weather design capacity of 8.5 million gallons per day (mgd) for secondary treatment and an average dry weather design capacity of 9.0 mgd for tertiary treatment, provides treatment and disposal of wastewater from residential, commercial, and industrial sources from the Cities of Gilroy and Morgan Hill.

The SCRWRF provides wastewater treatment through bar screens, aerated grit removal, pre-anoxic basins, oxidation ditches, and secondary clarifiers. Secondary effluent is disposed of in a system of 37 percolation ponds with a combined area of 395 acres and an average disposal capacity of 11 mgd and a pond storage capacity of 320 million gallons. Approximately 2 to 3 mgd of secondary effluent undergoes tertiary treatment for recycled water uses, but demand for recycled water may be higher in the summer months. Secondary effluent undergoes filtration through anthracite media filters and disinfection using sodium hypochlorite and dechlorinated. Beginning in Winter 2019/2020, tertiary effluent will be disinfected using ultraviolet light. Tertiary effluent may also be discharged to the Pajaro River under emergency wet weather conditions.

Grit and screenings are disposed of at the Monterey Regional Waste Management District landfill in Marina, California. Solids from primary and secondary clarification are dewatered using belt presses. Biosolids are transported by Synagro for beneficial reuse in Dos Palos.

Planned Upgrades

SCRWA is currently in the planning stages of expanding the SCRWRF to meet the expected future wastewater flows. The planned expansion project will include a parallel treatment system utilizing a membrane bioreactor (MBR) system. The planned upgrade will consist of improvements to the existing headworks and installation of bioreactor and membrane tanks. The headworks improvements will include a structure to split flow between the existing oxidation ditches and the MBR treatment system as well as installation of fine screens to protect the membranes.

The MBR treatment system will include parallel bioreactor tanks that will provide BOD and nitrogen removal by oxidation, nitrification, and denitrification in a series of anoxic and aerated zones with internal recycled. Flow will then proceed through hollow-fiber membranes to remove solids. Following membrane treatment, effluent will either be discharged to the percolation ponds or conveyed to disinfection for distribution in the recycled water system or discharged to the river.

Other SCRWRF improvements include new blowers for the MBR treatment system, chemical systems to membrane cleaning, and a new solids handling building that will house new screw presses to dewater biological solids produced by the MBR treatment system.

LOCAL LIMITS DEVELOPMENT APPROACH

The approach for developing and updating technically- and scientifically-based local limits is based on identifying and evaluating the following applicable information:

- Identification of sampling locations;
- Development of sampling frequencies; and
- Evaluation of existing conditions.

Sampling Location Identification

The development and update of technically- and scientifically-based local limits relies on wastewater and biosolids quality data from the SCRWA service area (e.g., collection system) and at various points in the treatment process to establish:

- Uncontrollable pollutant loads;
- In-plant removal efficiencies; and
- Biosolids quality.

Uncontrollable Pollutant Loads

Uncontrollable sources of pollutants (e.g., domestic users, commercial users, inflow and infiltration, drinking water, stormwater) typically contribute most of flow to a wastewater treatment plant and can result in significant pollutant loads. However, for most pollutants, uncontrollable sources contain lower pollutant concentrations in comparison to industrial wastewater.

In order to establish pollutant contributions from uncontrollable sources, the collection system must be monitored in an area where there are no industrial or permitted users wastewater sources. The 2004 Local Limits Guidance recommends selecting sampling points based on the size of the service area, variability in pollutant concentrations in different parts of the collection system, presence of inflow and infiltration, types and mix of commercial users, and variability in drinking water sources.

In-Plant Removal Efficiencies

In-plant removal efficiencies for pollutants are required to determine the maximum allowable headworks loading (MAHL) that can be effectively treated without overloading treatment design capacities, upsetting or inhibiting treatment processes, causing contamination of biosolids, exceeding NPDES permit effluent limitations, or other applicable effluent water quality requirements. In order to obtain this information, wastewater quality data are typically collected at influent, primary treatment effluent, anaerobic sludge digester, and final effluent locations.

Influent wastewater quality samples must be collected at a location prior to where raw wastewater mixes with any operational recirculation flows. Primary effluent data are used

to determine the pollutant removal efficiencies through primary treatment in order to calculate allowable headworks loadings (AHLs) that are protective of biological treatment processes (e.g., trickling filters, activated sludge). Anaerobic sludge digester sampling is necessary to determine biosolids partitioning factors, which are used to develop loading limits that will protect against anaerobic sludge digester upset and inhibition. Final effluent sampling is necessary to calculate overall treatment plant removal efficiencies and to determine compliance with NPDES permit effluent limitations.

Biosolids Quality

Different regulations apply depending on the biosolids disposal practice. Biosolids are monitored to determine the presence of any pollutants at levels exceeding the applicable biosolids regulations and to derive local limits that will protect biosolids handling processes and quality.

Recommended Sampling Frequency

For local limits development, Local Limits Guidance recommends the general sampling scheme, presented in **Table 1**, for a wastewater treatment plant of similar size to the WWTP (i.e., 5-10 MGD). Publicly-owned treatment works (POTWs) under this size category are encouraged to collect more samples based on local concerns and economics.

Table 1. Minimum Recommended Sampling Frequency for Local Limits Development (Consecutive Days to Sample)

Parameter	<u>Publicly-Owned Treatment Works</u>			Residential/ Commercial Collection System
	Influent	Effluent	Biosolids	
Organic priority pollutants	2	2	1	2
National pollutants of concern	14	14	2	7
POTW-specific pollutants of concern	14	14	2	7
Biosolids percent solids, biosolids ⁽¹⁾	–	–	2	–
Toxicity Characteristics Leaching Procedure (TCLP) pollutants ⁽²⁾	–	–	1	–

Note: Samples should be 24-hour composite samples unless sampling methods for a given pollutant only allow for grab samples. Samples should be collected on consecutive days.

- (1) Biosolids regulations in 40 CFR Part 503 require percent solids to be determined every day that biosolids are applied to land.
- (2) Conduct if biosolids are (or are likely to be) disposed of in a landfill.

Existing Conditions and Pollutant Screening Sampling

SCRWA conducts annual pollutant sampling of the influent, effluent, and biosolids at SCRWRF, most recently in December 2018. These existing data were used to identify pollutants of concern (POCs). A screening step included in the 1987 Local Limits Guidance, but not included in the 2004 Local Limits Guidance, is a useful tool for determining if a pollutant is a potential POC and warrants additional effort to develop and implement a local limit for the POC. This screening is particularly useful for organic pollutants because current standard laboratory detection levels are typically several orders of magnitude lower than the treatment process inhibition thresholds identified in the 2004 Local Limits Guidance. Additionally, most of these organic pollutants are typically not detected in wastewater, which further justifies that these POCs be excluded from further local limits development study.

The following screening criteria were used to assess if a pollutant was a potential POC that required further evaluation for development of a local limit:

- **Criterion 1:** The maximum effluent pollutant concentration is more than one-half the allowable effluent concentration required to meet water quality criteria/standards or the maximum sludge concentration is more than one-half the applicable biosolids criteria guidelines;
- **Criterion 2:** The maximum influent pollutant concentration as a grab sample is more than one-half the inhibition threshold;
- **Criterion 3:** The maximum influent pollutant concentration as a composite sample is more than one-fourth the inhibition threshold; or
- **Criterion 4:** The maximum influent pollutant concentration is more than 1/500th of the applicable biosolids use criteria.

Results of the pollutant screening is presented in **Appendix A**.

PROPOSED LOCAL LIMITS SAMPLING PLAN

After evaluating existing data, a local limits sampling program, which include the following key elements, is proposed to collect the additional sampling data needed to update SCRWA's local limits:

- Pollutants of concern;
- Sampling locations and schedule; and
- Sampling and analysis procedures.

Pollutants of Concern

POCs are selected for sampling, following the 2004 Local Limits Guidance, for pollutants that have the potential to interfere with SCRWA's Pretreatment Program objectives. Based on the pollutant screening discussed above, the POCs that were identified for further analysis are presented in **Table 2** along with the purpose of conducting sampling.

Sampling Locations and Schedule

For this local limits sampling effort, wastewater quality samples will be collected during dry, normal operating conditions from the collection system and SCRWRF influent, primary treatment effluent, and final effluent. No additional sampling will not be conducted for biosolids.

A general sampling schedule is provided in **Table 3**. It should be noted that some pollutants will not require additional sampling at some locations, and other pollutants are required to be sampled more frequently. The pollutant-specific sampling schedule is presented in **Appendix C**.

Sampling and Analysis Procedures

All SCRWRF sampling will be conducted such that wastewater is followed through the treatment process (i.e., primary treatment effluent sampling is initiated after influent sampling) according to the estimated detention time between each unit process to the extent practicable.

Composite and grab samples will be collected depending on the pollutant sampled. A summary of sample collection and container requirements is presented in **Table 4**. Recommended analytical methods and maximum reporting limits are provided in **Appendix B**. Sampling procedures are provided in **Appendix E**.

Table 2. South County Regional Wastewater Authority Pollutants of Concern

Pollutant	Environmental/ Operational Factor(s) ⁽¹⁾	Local Limits Development ⁽²⁾
<i>Conventional</i>		
Ammonia as N	D, I	X
Biochemical oxygen demand (BOD)	D, P	X
Boron	P	(3)
Chloride	P	(3)
Sodium	P	(3)
Sulfate as SO ₄	P	(3)
Sulfide as S	I	(3)
Total dissolved solids	P	(3)
Total suspended solids	D, P	X
<i>Metals (Total Recoverable)</i>		
Arsenic	I, B	X
Cadmium	I, B	X
Chromium	I, B	X
Copper	P, I, B	X
Lead	P, I, B	X
Mercury	B	X
Molybdenum	B	X
Nickel	I, B	X
Selenium	B	X
Silver	I, B	X
Zinc	I, B	X
<i>Other Toxics</i>		
Cyanide	I	X

(1) Environmental and/or operational factors are used to drive the development of the maximum allowable headworks loading (MAHL) and potential local limit. Four factors (D = design capacity, P = permitted effluent limitation, I = treatment process inhibition, B = biosolids restrictions) are typically assessed in the developing the MAHL and/or local limit.

(2) At a minimum, SCRWA will develop, update, and/or implement local limits for all national POCs.

(3) Sampling will be conducted for these pollutants to conduct a headworks loading analysis to determine if a local limit needs to be developed and implemented.

Table 3. General Sampling Locations and Sampling Frequency

Location	Consecutive Days of Sampling		
	Conventional Pollutants	Metals & Cyanide	Organics
Collection System	7	7	–
SCRWRF Influent	7	7	–
SCRWRF Primary Treatment Effluent	7	7	–
SCRWRF Secondary Treatment Effluent	7	7	–
SCRWRF Tertiary Treatment Effluent	7	7	–

Table 4. Sample Collection and Container Requirements

Parameter	Sample Type	Sample Size	Container	Preservation ⁽¹⁾	Maximum Hold Time
Biochemical oxygen demand	Composite ⁽²⁾	2 x 1 L	Plastic	None	48 hours
Chloride					7 days
Sulfate as SO ₄					7 days
Total dissolved solids					7 days
Total suspended solids					7 days
Metals (total recoverable) ⁽³⁾	Composite ⁽²⁾	500 mL	Plastic	HNO ₃ to pH<2	6 months
Ammonia as N	Grab	500 mL	Plastic	H ₂ SO ₄ to pH<2	28 days
Cyanide	Grab	500 mL	Plastic	NaOH to pH>12	14 days
Mercury ⁽³⁾	Grab	500 mL	Glass	HCl to pH<2	90 days
Sulfide as S	Grab	BOD bottle	Glass	NaOH, zinc acetate	7 days

Note: SCRWA will need to coordinate with the analytical laboratory to verify appropriate sampling containers.

- (1) All samples must be iced or chilled to 0-6°C.
- (2) If possible, 24-hour flow-proportional composite samples should be collected. If flow-proportional composite samples are not possible, then 24-hour time-proportional composite samples will be collected.
- (3) At the collection system, and SCRWRF influent sampling locations, mercury is sampled as a composite sample in the same container with the other metals. At the SCRWRF primary effluent, secondary effluent, and tertiary effluent, mercury is sampled as a grab sample in a separate container.

Typical equipment required for sample collection is presented in **Appendix D**. Additional equipment may be needed depending on the sampling location. All samples must be collected using clean techniques according to EPA Method 1669 (see **Appendix E**). Samples must be iced or chilled to less than 6° C, from the time of collection to delivery to the analytical laboratory, to minimize sample degradation and maintain sample integrity.

All sample containers should be labeled with the following information:

- Project name;
- Sample location;
- Date of sample collection;
- Time of sample collection;
- Sample collectors' initials;
- Sample preservative (if present); and
- Analysis to be performed.

Time of sample collection is the time that a grab sample was taken or the end of the composite period for composite samples. Sample containers should be properly labeled prior to sample collection to expedite the sampling process as well as to ensure that the proper samples are collected. Chain-of-custody forms must be completed at the time of sampling and accompany each sampling event. Coolers used during transport must have sufficient cooling agents to maintain sample temperature of less than 6° C.

Composite Sampling

If possible, composite samples should be taken as 24-hour flow-proportional samples. If flow-proportional composite samples cannot be collected, then composite samples should be 24-hour time-proportional samples. Composite samplers should be calibrated prior to the initial sampling event to ensure accurate operation. All composite samples must be collected in clean, acid-washed sample containers to mitigate the potential for sample contamination. Specific cleaning protocols are included in **Appendix E**.

Grab Sampling

Grab samples should be collected at locations close to the composite sampler intake to ensure that composite and grab samples are collected at the same location. Grab samples must be collected directly into clean, laboratory-provided sample containers. If necessary, the sample container can be fastened to a sampling grab pole. Using this sampling technique, the "pole-side" of the container must be always directed downstream of the sample container to minimize the potential for contamination from the sampling grab pole. Grab samples associated with the composite sample are collected on the same day that the composite samples are removed from the sampling unit.

Field Measurements

At the time of grab sample collection, electrical conductivity, pH, and temperature are to be measured using equipment calibrated according to instrument specifications for all locations and recorded in the field log. Field measurements must be conducted within the shortest holding time requirements prescribed for the parameter (i.e., temperature and pH). The field measurements may be used to provide insight on pollutant results if there are abnormal results.

QUALITY ASSURANCE/QUALITY CONTROL

An effective quality assurance/quality control (QA/QC) plan is implemented as part of the local limits sampling program to ensure that analytical data can be used with confidence. QA/QC procedures to be initiated include the following:

- Field controls;
- Laboratory controls;
- Sample chain-of-custody; and
- Data verification.

On days when samples are collected for QA/QC purposes, extra volume (sample or blank water) may be required for analyses. The analytical laboratory should be consulted to determine if additional volume is needed to run QA/QC analyses. When duplicate samples are collected for QA/QC purposes, double the sample volume is typically required for analyses. Once the filled composite containers are retrieved from the sampler, the sample is split, adhering to clean techniques, into the appropriate sample containers as specified by the analytical method. For grab sample field duplicates, it is necessary to collect two individual grab samples. After samples are split into the appropriate containers, samples are to be packaged appropriately, iced, and delivered/shipped to the analytical laboratory. A QA/QC schedule is provided in **Table 5**.

Field Controls

To minimize sampling errors and potential contamination, field controls are QA/QC procedures that are implemented prior to and during sampling until samples are delivered to the analytical laboratory. Field controls to be initiated include the following:

- Field logs;
- Sample chain-of-custody;
- Sampling equipment cleaning and clean techniques;
- Field/equipment blanks; and
- Field duplicates.

Table 5. Quality Assurance/Quality Control Schedule

Day	QA/QC Type ⁽¹⁾
Collection System	
Day 0	Field blank (Metals)
Day 1	Field blank (Cyanide)
Day 2	Laboratory duplicate (BOD; Metals; Chloride; Sulfate as SO ₄ ; Sulfide as S; TDS; TSS; Ammonia as N; Cyanide)

SCRWRF Influent	
Day 0	Field blank (Metals)
Day 1	Field blank (Cyanide)
Day 4	MS/MSD (Metals; Cyanide)
SCRWRF Primary Treatment Effluent	
Day 0	Field blank (Metals)
Day 1	Field blank (Mercury; Cyanide) Field duplicate (Metals; Mercury; Cyanide)
SCRWRF Secondary Effluent	
Day 5	Laboratory duplicate (Boron; Sodium; Chloride; Sulfate as SO ₄ , TDS)
SCRWRF Tertiary Effluent	
Day 0	Field blank (Metals)
Day 1	Field blank (Cyanide; Mercury)
Day 7	MS/MSD (Metals; Cyanide; Mercury)

(1) For samples identified for site-specific field duplicates, laboratory duplicates, and MS/MSD, extra sample volume may be collected and must be identified on the chain-of-custody form as the sample designated for site-specific field duplicates, laboratory duplicates, or MS/MSD. See **Table C-1** for sampling schedule and sample container requirements.

Field Logs

The purpose of field logs is to record sampling information and field observations during sampling that may explain any uncharacteristic analytical results. The field log should contain sampling information such as the date and time of sample collection, sampling team, container identification numbers, and types of samples (composite or grab) that were collected. The field log should also describe any field observations that are abnormal at the sampling location (color, odor, etc.). Field measurements for electrical conductivity, pH, and temperature should also be recorded in the field log.

Sample Chain-of-Custody

Sample chain-of-custody procedures include the following:

- Proper labeling of samples;
- Use of chain-of-custody forms for all samples from the field to the analytical laboratory; and
- Prompt sample delivery to the laboratory.

The following notes should be added to chain-of-custody forms to request the following:

- Low detection limits;
- Detected-but-not-quantified (DNQ), or J-flag, reporting; and

- Field and laboratory duplicate and MS/MSD analyses for specific samples as noted in **Table 5**.

Sampling Equipment Cleaning and Clean Techniques

Strict adherence to using clean sample equipment and clean techniques to collect samples is intended to minimize the potential of sample contamination.

Prior to initiating sampling efforts, composite sampler intake tubing, peristaltic silicone pump tubing, the intake strainer, composite containers, and lids must be acid-washed to minimize the potential for contamination. Ideally, all cleaning should be conducted by the analytical laboratory to mitigate the potential for contamination. To ensure that equipment used for sampling is clean, field/equipment blanks will be collected at the beginning of the monitoring effort to identify any potential contamination.

Clean techniques involve the use of clean powder-free nitrile gloves during sample collection and handling, acid-washed tubing for the suction line, acid-washed silicone tubing for the peristaltic pump tubing, and acid-washed strainer. A discussion of clean techniques is included as **Appendix E**.

Field/Equipment Blanks

The purpose of field/equipment blanks is to check for potential contamination that may occur during equipment handling and/or sample collection. Field/equipment blanks should be collected under field conditions to best simulate field procedures. Blank water used for field/equipment blank collection should be provided by the analytical laboratory that will perform the sample analysis. Field/equipment blanks will be generated for metals (including mercury) and cyanide at the collection system and SCRWRF influent, primary treatment effluent, and final effluent locations.

Because composite samplers vary in design, follow manufacturer's instructions for instrument set-up and operation. The following steps are general recommendations for equipment blank collection prior to composite sample collection:

1. Using clean techniques, install clean silicone pump tubing into sampler peristaltic pump. Connect the intake side of the silicone tubing to the clean intake tubing.
2. Remove the end cap from the intake end of the clean intake tubing and place the intake end of the tubing inside the full laboratory-provided blank water container. Remove the end cap from the outlet side of the silicone tubing and place the outlet end of the tubing into a clean composite container.
3. Press "pump forward" on the automatic sampler. Allow pumping to continue until the blank water has been pumped through the tubing and into the composite sample container.
4. Remove the outlet of the silicone tubing from the composite sample container and cover with a new glove or plastic bag. Pour the blank water

from the composite sample container into the appropriate pre-labeled sample container(s) while using clean techniques. Place the full sample container(s) on ice.

5. Return the outlet of the silicone tubing to the composite sample container. Place the inlet of the intake tubing into the next container of blank water and proceed with Step 3 until all composite equipment blanks have been collected. Then prepare and set-up the sampler for composite sample collection.

Field blanks for grab samples should be collected on the same day that grab samples are collected. Field blanks are collected by pouring appropriate, laboratory-provided, blank water directly into pre-labeled grab sample container(s) using clean techniques.

Field Duplicates

The purpose of field duplicates is to check for constancy in field sampling procedures. Two separate sample containers will be collected for each analysis. One sample container is labeled as the regular sample while the other sample container is labeled to designate that it is the field duplicate.

Laboratory Controls

The analytical laboratory should conduct QA/QC procedures including the following:

- Standard laboratory operation and calibration procedures
- Laboratory control standards (LCS/LCSD) and method blank;
- Analytical batch matrix spike/matrix spike duplicate (MS/MSD); and
- Laboratory duplicate and field duplicate.

Standard Laboratory Operation and Calibration Procedures

The analytical laboratory must calibrate equipment according to standard laboratory procedures in order to prevent analytical inaccuracies.

Laboratory Control Standards (LCS/LCSD) and Method Blank

Analytical laboratories typically conduct laboratory control standard and method blank analyses per analytical batch of twenty samples. LCS/LCSD analyses are intended to provide information on the accuracy and precision of the analytical method and laboratory performance.

The purpose of the method blank is to determine the presence of, if any, and extent of contamination resulting from laboratory activities. If there is contamination in the method blank, the associated data must be carefully evaluated to determine if the data are valid. The analytical batch must meet the laboratory QA/QC acceptance criteria to certify that all results within the analytical batch are accurate and acceptable.

Analytical Batch Matrix Spikes/Matrix Spike Duplicates (MS/MSD)

The purpose of MS/MSD analyses is to check for accuracy and precision of the laboratory analyses and to demonstrate acceptable compound recovery at the analytical laboratory. Triple the normal sample volume may be required. Analytical batch MS/MSD analyses must be performed on site-specific field samples, identified in **Table 5**, and should be conducted, at a maximum, for every twenty samples for the following pollutants:

- Metals;
- Mercury; and
- Cyanide.

Laboratory Duplicate

The purpose of the laboratory duplicate performed on site-specific samples is to check consistency in laboratory and analytical procedures. Laboratory duplicates must be taken from the same sample container as the original sample.

Data Verification

After analytical results are received from the laboratory, the data will be verified with the following procedures:

- Check the adequacy of the results obtained from the analyses of blanks, spikes, and duplicates (according to acceptability criteria set forth in *Standard Methods*);
- Check the data set for outlier values and, accordingly, request reanalysis of samples where appropriate; and
- Perform in-house verification of all analytical data results. This may include, but is not limited to:
 - Check that all samples were analyzed and/or properly preserved within the maximum holding time; and
 - Check that all laboratory QA/QC parameters meet laboratory-established criteria. Any results reported outside the QA/QC acceptance range must be qualified with a narrative explaining why the sample result is or is not acceptable.

LOCAL LIMITS DERIVATION

Permitted users discharging to POTWs may be subject to any of the following restrictions:

- Narrative discharge prohibitions;
- National USEPA categorical pretreatment standards; and/or
- POTW-specific (and possibly industry-specific) local limits.

Narrative Discharge Prohibitions

Narrative discharge prohibitions, which provide non-numeric restrictions to protect against such problems as violations of effluent, biosolids, or air quality standards, treatment process inhibition or upset, flow obstruction in the collection system or at the POTW, fire and explosion hazard, or work safety hazard, serve as a supplement to numeric limits, or are used for parameters where technically-based numeric limits may not be feasible or relevant. Narrative discharge prohibitions are identified in Ordinance 2013-01 and wastewater discharge permits issued to permitted users.

National USEPA Categorical Pretreatment Standards

Categorical standards are predetermined discharge limitations, based upon best available technologies (BATs), which apply to specific categories of industries defined by existing federal regulations (40 CFR Parts 405 through 471). Categorical standards are applied to the end of a user's regulated process, and not necessarily at the end-of-pipe. Both categorical and local limits apply to industrial users, as appropriate.

POTW-specific Local Limits

Numeric local limits are intended to apply to all permitted users unless specific exceptions can be justified. Local limit derivation is based on the following factors:

- Final effluent and/or receiving water quality limitations;
- In-plant inhibition and/or upset of unit processes;
- Biosolids disposal limits; and/or
- Collection system concerns (e.g., flow obstruction, corrosion, worker safety).

According to Local Limits Guidance, numeric local limits can be applied to permitted users using any of the following allocation methods:

- Limits based on user contribution of a POC;
- Uniform limits for all permitted users;
- User needs for POC discharge loading on a case-by-case basis; and/or
- Other creative allocation methods.

Schedule for Local Limits Development

Local limits sampling will be conducted in January 2019, and a local limits report presenting the maximum allowable industrial loadings (MAILs) will be completed in Spring 2020.

REFERENCES

California Regional Water Quality Control Board Central Coast Region. Waste Discharge Requirements for South County Regional Wastewater Authority South County Regional Wastewater Treatment and Reclamation Facility (CA0049964, Order No. R7-2017-0028). September 2017.

United States Environmental Protection Agency. Local Limits Development Guidance. July 2004.

United States Environmental Protection Agency. Sampling Ambient Water for Determination of Metals at EPA Water Quality Criteria Levels (Method 1669). April 1995.

Pollutants of Concern Screening

Pollutant	Reason for Not Conducting Headworks Loading Analysis/Developing Local Limit
Metals (Total Recoverable)	
Nitrate as N	While SCRWA has an NPDES permit effluent limitation, this pollutant is a byproduct of incomplete nitrification and is not likely to be discharged by industrial users. If subsequent monitoring indicates that the pollutant is present in the influent, SCRWA will evaluate the need for developing a local limit at that time.
Metals (Total Recoverable)	
Antimony	The pollutant was not detected in the biosolids at a level (7.4 mg/kg wet weight) significantly less than one-half of the applicable biosolids use criterion (500 mg/kg wet weight).
Barium	The maximum biosolids concentration (14 mg/kg wet weight) is significantly less than one-half of the applicable biosolids use criterion (10,000 mg/kg wet weight).
Beryllium	The pollutant was not detected in the biosolids at a level (0.37 mg/kg wet weight) significantly less than one-half of the applicable biosolids use criterion (75 mg/kg wet weight).
Cobalt	The pollutant was not detected in the biosolids at a level (4.9 mg/kg wet weight) significantly less than one-half of the applicable biosolids use criterion (8,000 mg/kg wet weight).
Thallium	The pollutant was not detected in the biosolids at a level (3.4 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (700 mg/kg wet weight).
Vanadium	The pollutant was not detected in the biosolids at a level (2.4 mg/kg wet weight) significantly less than one-half of the applicable biosolids use criterion (2,400 mg/kg wet weight).
Volatile Organics	
1,2-Dichlorobenzene	This pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than one-half of the activated sludge inhibition level (5,000 µg/L).
1,3-Dichlorobenzene	This pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than one-half of the activated sludge inhibition level (5,000 µg/L).
1,4-Dichlorobenzene	This pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than one-half of the activated sludge inhibition level (5,000 µg/L).
Benzene	This pollutant was not detected in the influent at a level (1.5 µg/L) significantly less than one-half of the activated sludge inhibition level (100,000 µg/L).

Pollutant	Reason for Not Conducting Headworks Loading Analysis/Developing Local Limit
Chlorodibromomethane	While SCRWA has an NPDES permit effluent limitation, this pollutant is a byproduct of chlorination and is not likely to be discharged by industrial users. SCRWA is in the process of converting to ultraviolet light disinfection, which is expected to mitigate the formation of this pollutant during disinfection. If monitoring subsequent to the implementation of ultraviolet light disinfection indicates that the pollutant is present in the effluent discharge, SCRWA will evaluate the need for developing a local limit at that time.
Dichlorobromomethane	While SCRWA has an NPDES permit effluent limitation, this pollutant is a byproduct of chlorination and is not likely to be discharged by industrial users. SCRWA is in the process of converting to ultraviolet light disinfection, which is expected to mitigate the formation of this pollutant during disinfection. If monitoring subsequent to the implementation of ultraviolet light disinfection indicates that the pollutant is present in the effluent discharge, SCRWA will evaluate the need for developing a local limit at that time.
Ethylbenzene	This pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than one-half of the activated sludge inhibition level (200,000 µg/L).
Toluene	This pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than one-half of the activated sludge inhibition level (200,000 µg/L).
Trichloroethylene	The pollutant was not detected in the influent at a level (2.5 µg/L) significantly less than 1/500 th of the applicable biosolids use criterion (204,000 µg/L).
<i>Semi- and Non-Volatile Organics</i>	
Anthracene	This pollutant was not detected in the influent at a level (200 µg/L) significantly less than one-quarter of the activated sludge inhibition level (500,000 µg/L).
2-Chlorophenol	This pollutant was not detected in the influent at a level (100 µg/L) significantly less than one-quarter of the activated sludge inhibition level (5,000 µg/L).
2,4-Dichlorophenol	This pollutant was not detected in the influent at a level (100 µg/L) significantly less than one-quarter of the activated sludge inhibition level (64,000 µg/L).
2,4-Dimethylphenol	This pollutant was not detected in the influent at a level (40 µg/L) significantly less than one-quarter of the activated sludge inhibition level (40,000 µg/L).
2,4-Dinitrotoluene	This pollutant was not detected in the influent at a level (100 µg/L) significantly less than one-quarter of the activated sludge inhibition level (5,000 µg/L).
1,2-Diphenylhydrazine	This pollutant was not detected in the influent at a level (20 µg/L) significantly less than one-quarter of the activated sludge inhibition level (5,000 µg/L).

Pollutant	Reason for Not Conducting Headworks Loading Analysis/Developing Local Limit
Hexachlorobenzene	This pollutant was not detected in the influent at a level (20 µg/L) significantly less than one-quarter of the activated sludge inhibition level (5,000 µg/L).
Naphthalene	This pollutant was not detected in the influent at a level (20 µg/L) significantly less than one-quarter of the activated sludge inhibition level (500,000 µg/L).
Nitrobenzene	This pollutant was not detected in the influent at a level (20 µg/L) significantly less than one-quarter of the activated sludge inhibition level (30,000 µg/L).
Pentachlorophenol	This pollutant was not detected in the influent at a level (100 µg/L) less than one-quarter of the activated sludge inhibition level (950 µg/L).
Phenanthrene	This pollutant was not detected in the influent at a level (100 µg/L) significantly less than one-quarter of the activated sludge inhibition level (500,000 µg/L).
Phenol	The maximum influent concentration (22 µg/L) is significantly less than one-quarter of the activated sludge inhibition level (50,000 µg/L).
2,4,6-Trichlorophenol	This pollutant was not detected in the influent at a level (200 µg/L) significantly less than one-quarter of the activated sludge inhibition level (50,000 µg/L).
<i>Pesticides and PCBs</i>	
Aldrin	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (1.4 mg/kg wet weight).
gamma-BHC	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (4.0 mg/kg wet weight).
Chlordane	The pollutant was not detected in the biosolids at a level (0.98 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (2.5 mg/kg wet weight).
4,4'-DDT	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (1.0 mg/kg wet weight).
4,4'-DDE	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (1.0 mg/kg wet weight).
4,4'-DDD	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (1.0 mg/kg wet weight).

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Dieldrin	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (8.0 mg/kg wet weight).

Pollutant	Reason for Not Conducting Headworks Loading Analysis/Developing Local Limit
Endrin	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (0.2 mg/kg wet weight).
Heptachlor	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (4.7 mg/kg wet weight).
Methoxychlor	The pollutant was not detected in the biosolids at a level (0.025 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (100 mg/kg wet weight).
PCBs	The pollutant was not detected in the biosolids at a level (0.098 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (50 mg/kg wet weight).
Toxaphene	The pollutant was not detected in the biosolids at a level (0.98 mg/kg wet weight) significantly below one-half of the applicable biosolids use criterion (5 mg/kg wet weight).

Maximum Reporting Limits and Analytical Methods

Local Limits Sampling Plan

Table B-1. Maximum Reporting Limits and Analytical Methods

Pollutant	Maximum Reporting Limit	Units	Analytical Method
<i>Conventional</i>			
Ammonia as N	0.1	mg/L	SM 4500-NH ₃ -G
Biochemical oxygen demand	3	mg/L	SM 5210B
Chloride	10	mg/L	EPA 300.0
Sulfate as SO ₄	1	mg/L	EPA 300.0
Sulfide as S	0.1	mg/L	SM 4500 S E
Total dissolved solids	10	mg/L	SM 2540C
Total suspended solids	3	mg/L	SM 2540D
<i>Metals (Total Recoverable)</i>			
Arsenic	0.5	µg/L	EPA 200.8
Boron	1	mg/L	EPA 200.8
Cadmium	0.25	µg/L	EPA 200.8
Chromium	0.5	µg/L	EPA 200.8
Copper	0.5	µg/L	EPA 200.8
Lead	0.5	µg/L	EPA 200.8
Mercury (collection system, influent)	0.05	µg/L	EPA 245.1
Mercury (primary effluent, secondary effluent, tertiary effluent)	0.0002	µg/L	EPA 1631E
Molybdenum	0.5	µg/L	EPA 200.8
Nickel	0.5	µg/L	EPA 200.8
Selenium	0.5	µg/L	EPA 200.8
Silver	0.5	µg/L	EPA 200.8
Sodium	10	mg/L	EPA 200.8
Zinc	2.5	µg/L	EPA 200.8
<i>Other Toxics</i>			
Cyanide	3	µg/L	SM 4500-CN-E

Sampling Schedule

In addition to collecting samples, other tasks will be performed during the sampling period include the following:

Set-up activities

- Set-up composite sampler with new silicone tubing.
- Install new battery for sampler.
- Calibrate and program composite sampler.
- Install clean composite sample container.
- Start composite sampler.

Sampling day activities

- Remove full composite sample container from composite sampler.
- Install clean composite sample container and start sampler.
- Pour off composite sample container contents into appropriate individual containers.
- Deliver daily samples to laboratory for analyses.

The following table lists the POCs that will be collected on each day, including the QA/QC samples and the number and type of containers that need to be filled.

Local Limits Sampling Plan

Table C-1. Sampling Schedule

Sampling Day	Samples to Collect		Sample Containers Required (1)
	Composite	Grab	
Collection System			
Day 0	Metals (2) (field blank)		1 – 500 mL plastic HNO 3
Day 1	BOD; Chloride; Sulfate as SO4; TDS; TSS Metals (2)	Ammonia as N Cyanide (+field blank) Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO3 1 – 500 mL plastic H SO 2 4 2 – 500 mL plastic NaOH
Day 2	BOD; Chloride; Sulfate as SO 4 ; TDS; TSS Metals (2) (+laboratory duplicate)	Ammonia as N Cyanide Field parameters (3) (+laboratory duplicate)	2 – 1 L plastic 1 – 500 mL plastic HNO 3 1 – 500 mL plastic H SO 2 4 1 – 500 mL plastic NaOH
Day 3	BOD; Chloride; Sulfate as SO 4 ; TDS; TSS Metals (2)	Ammonia as N Cyanide Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO3 1 – 500 mL plastic H2SO4 1 – 500 mL plastic NaOH
Day 4	BOD; Chloride; Sulfate as SO4; TDS; TSS Metals (2)	Ammonia as N Cyanide Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO 3 1 – 500 mL plastic H SO 2 4 1 – 500 mL plastic NaOH
Day 5	BOD; Chloride; Sulfate as SO4; TDS; TSS Metals (2)	Ammonia as N Cyanide Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO3 1 – 500 mL plastic H SO 2 4 1 – 500 mL plastic NaOH
Day 6	BOD; Chloride; Sulfate as SO4; TDS; TSS Metals (2)	Ammonia as N Cyanide Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO3 1 – 500 mL plastic H SO 2 4 1 – 500 mL plastic NaOH
Day 7	BOD; Chloride; Sulfate as SO 4 ; TDS; TSS Metals (2)	Ammonia as N Cyanide Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO 3 1 – 500 mL plastic H SO 2 4 1 – 500 mL plastic NaOH
SCRWRF Influent			
Day 0	Metals (2) (field blank)		1 – 500 mL plastic HNO3
Day 1	Chloride; Sulfate as SO4; TDS Metals (2)	Ammonia as N Cyanide (+field blank) Sulfide as S Field parameters (3)	2 – 1 L plastic 1 – 500 mL plastic HNO3 1 – 500 mL plastic H2SO4 2 – 500 mL plastic NaOH 1 – BOD bottle NaOH Zn acetate

Local Limits Sampling Plan

Day 2	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽²⁾	Ammonia as N Cyanide Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 1 – 500 mL plastic NaOH 1 – BOD bottle NaOH Zn acetate

Local Limits Sampling Plan

Sampling Day	Samples to Collect		Sample Containers Required ⁽¹⁾
	Composite	Grab	
Day 3	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽²⁾	Ammonia as N Cyanide Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 1 – 500 mL plastic NaOH
Day 4	Chloride; Sulfate as SO ₄ ; TDS Metals (+MS/MSD) ⁽²⁾	Ammonia as N Cyanide (+MS/MSD) Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 3 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 3 – 500 mL plastic NaOH
Day 5	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽²⁾	Ammonia as N Cyanide Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 1 – 500 mL plastic NaOH 1 – BOD bottle NaOH Zn acetate
Day 6	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽²⁾	Ammonia as N Cyanide Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 1 – 500 mL plastic NaOH
Day 7	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽²⁾	Ammonia as N Cyanide Sulfide as S Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 1 – 500 mL plastic NaOH
SCRWRF Primary Treatment Effluent			
Day 0	Metals (field blank) ⁽⁴⁾		1 – 500 mL plastic HNO ₃
Day 1	Metals ⁽⁴⁾ Chloride (+field duplicate)	Cyanide (+field blank) Mercury (+field blank) Field parameters ⁽³⁾ (+field duplicate)	2 – 500 mL plastic HNO ₃ – 500 mL plastic 3 – 500 mL plastic NaOH 3 – 500 mL glass HCl
Day 2	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl
Day 3	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl
Day 4	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl

Local Limits Sampling Plan

Sampling Day	<u>Samples to Collect</u>		Sample Containers Required ⁽¹⁾
	Composite	Grab	
Day 5	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ ¹ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl
Day 6	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ ¹ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl
Day 7	Metals ⁽⁴⁾ Chloride	Cyanide Mercury Field parameters ⁽³⁾	1 – 500 mL plastic HNO ₃ ¹ – 500 mL plastic 1 – 500 mL plastic NaOH 1 – 500 mL glass HCl
SCRWRF Secondary Effluent			
Day 0	None		
Day 1	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 2	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 3	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 4	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 5	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium (+laboratory duplicate)	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 6	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
Day 7	Chloride; Sulfate as SO ₄ ; TDS Boron; Sodium	Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃
SCRWRF Tertiary Effluent			
Day 0	Metals ⁽⁵⁾ (field blank)		1 – 500 mL plastic HNO ₃
Day 1	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury (+field blank) Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ ² 1 – 500 mL plastic H ₂ SO ₄ ⁴ 2 – 500 mL glass HCl

Local Limits Sampling Plan

Sampling Day	Samples to Collect		Sample Containers Required ⁽¹⁾
	Composite	Grab	
Day 2	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H ₂ SO ₄ 3 1 – 500 mL glass HCl
Day 3	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H SO ₂ 4 1 – 500 mL glass HCl
Day 4	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H SO ₂ 4 1 – 500 mL glass HCl
Day 5	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H SO ₂ 4 1 – 500 mL glass HCl
Day 6	Chloride; Sulfate as SO ₄ ; TDS Metals ⁽⁵⁾	Ammonia as N Mercury Field parameters ⁽³⁾	2 – 1 L plastic 1 – 500 mL plastic HNO ₃ 3 1 – 500 mL plastic H SO ₂ 4 1 – 500 mL glass HCl
Day 7	Chloride; Sulfate as SO ₄ ; TDS Metals (+MS/MSD) ⁽⁵⁾	Ammonia as N Mercury (+MS/MSD) Field parameters ⁽³⁾	2 – 1 L plastic 3 – 500 mL plastic HNO ₃ 1 – 500 mL plastic H SO ₂ 4 3 – 500 mL glass HCl

- (1) Sample volume and container size listed above are recommendation only. Sample size and number of containers may be reduced as long as the sample volume meets the minimum analytical volume criteria of the analytical laboratory.
- (2) Metals (total recoverable) include arsenic, boron, cadmium, chromium, copper, lead, mercury, molybdenum, nickel, selenium, silver, sodium, zinc.
- (3) Field parameters include electrical conductivity, pH, and temperature.
- (4) Metals (total recoverable) include arsenic, cadmium, chromium, copper, lead, nickel, zinc.
- (5) Metals (total recoverable) include arsenic, boron, cadmium, chromium, copper, lead, molybdenum, nickel, selenium, silver, sodium, zinc.

Sampling Equipment List

Local Limits Sampling Plan

At a minimum, the following list of equipment will be required for local limits sample collection:

- Automated peristaltic samplers for composite sample collection.
- New silicone tubing for the composite samplers.
- Strainers for the four new sources, influent, and collection system intake tubing.
- Powder-free nitrile gloves for clean sampling.
- Sampling containers and field blank water as listed in the following tables:

Table D-1. Sample Container Requirements by Sampling Site

Sample Type	Pollutant	Containers ⁽¹⁾
<u>Collection System</u>		
Composite ⁽²⁾	BOD; Chloride; Sulfate as SO ₄ ; TDS; TSS (+laboratory duplicate)	14 – 1 L plastic
	Metals (+field blank; +laboratory duplicate)	8 – 500 mL plastic HNO ₃
Grab	Ammonia as N (+laboratory duplicate)	7 – 500 mL plastic H ₂ SO ₄
	Cyanide (+field blank; +laboratory duplicate)	8 – 500 mL plastic NaOH
<u>SCRWRF Influent</u>		
Composite ⁽²⁾	Chloride; Sulfate as SO ₄ ; TDS	14 – 1 L plastic
	Metals (+field blank; +MS/MSD)	10 – 500 mL plastic HNO ₃
Grab	Ammonia as N	7 – 500 mL plastic H ₂ SO ₄
	Cyanide (+field blank; +MS/MSD)	10 – 500 mL plastic NaOH
	Sulfide as S	7 – BOD bottle NaOH Zn acetate
<u>SCRWRF Primary Treatment Effluent</u>		
Composite ⁽²⁾	Chloride (+field duplicate)	8 – 500 mL plastic
	Metals (+field blank; +field duplicate)	9 – 500 mL plastic HNO ₃
Grab	Mercury	9 – 500 mL glass HCl
	Cyanide (+field blank; +field duplicate)	9 – 500 mL plastic NaOH
<u>SCRWRF Secondary Effluent</u>		
Composite ⁽²⁾	Chloride; Sulfate as SO ₄ ; TDS (+laboratory duplicate)	14 – 1 L plastic
	Boron; Sodium (+laboratory duplicate)	7 – 500 mL plastic HNO ₃
<u>SCRWRF Tertiary Effluent</u>		
Composite ⁽²⁾	Chloride; Sulfate as SO ₄ ; TDS	14 – 1 L plastic
	Metals (+field blank; +MS/MSD)	10 – 500 mL plastic HNO ₃

Local Limits Sampling Plan

Grab	Ammonia as N	7 – 500 mL plastic H ₂ SO ₄

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Sample Type	Pollutant	Containers ⁽¹⁾
	Mercury (+field blank; +MS/MSD)	10 – 500 mL glass HCl

- (1) Sample volume and container size listed above are recommendation only. Sample size and number of containers may be reduced as long as the sample volume meets the minimum analytical volume criteria of the analytical laboratory.
- (2) Collected in a clean composite container to be split into individual sample containers.

Table D-2. Total Sample Container and Blank Water Requirements

Container Type ⁽¹⁾	Number	Blank Water Requirements
1 L plastic	56	0
500 mL plastic	8	0
500 mL plastic HNO ₃	44	4
500 mL plastic H ₂ SO ₄	21	0
500 mL plastic NaOH	27	3
500 mL glass HCl	20	2
BOD bottle NaOH Zn acetate	7	0

(1) Sample volume and container size listed above are recommendation only. Sample size and number of containers may be reduced as long as the sample volume meets the minimum analytical volume criteria of the analytical laboratory.

Sampling Procedures

GENERAL SAMPLING PROCEDURES

All sampling will be conducted in accordance with the SCRWA Health and Safety Plan.

“Clean sampling” techniques are required to collect and handle wastewater samples in a way that does not result in contamination, loss, or change in the chemical form of the POC. Samples are collected using rigorous protocols, based on EPA Method 1669, as summarized below:

- All sampling will be conducted by two personnel using clean-hand/dirty-hand sampling procedures.
- Samples are collected only into pre-cleaned sample containers.
- Clean, powder-free nitrile gloves are required to be worn for collection of samples for metals and organic pollutants.
- Gloves are changed whenever something not known to be clean has been touched.
- For this sampling plan, clean techniques must be employed whenever handling the composite containers, lids, suction tubing, or strainers.
- To reduce potential contamination, sample collection personnel must adhere to the following rules while collecting samples:
 - No smoking.
 - Never sample near a running vehicle. Do not park vehicles in the immediate sample collection area (even non-running vehicles).
 - Do not eat or drink during sample collection.
 - Do not breathe, sneeze, or cough in the direction of an open sample container.

SAMPLING AND HANDLING

PROCEDURES Composite Sampling

Procedures

- The composite sampler will be thoroughly cleaned before initial use. If conditions warrant, intake tubing may be rinsed in the field at the sampling site with laboratory-grade de-ionized water only.
- The composite sampler will be programmed using a variable collection time sequence.
- One continuous piece of new silicone tubing will be used for the pump and intake tube. The same silicone tubing will be used for the entire sampling

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effort and any follow-up and/or rescheduled sampling events. In the event of a rescheduled sampling event, the silicone tubing will be rinsed for three

(3) minutes with laboratory-grade de-ionized water and stored in a sealed plastic bag in the laboratory refrigerator until needed.

- The sample intake tube will be as short as possible.
- An intake rinse will not be used; however a 100-count post-purge will be used.
- Metal strainers will not be used.
- A cooling agent (i.e., ice) will be used in the base of the composite sampler to maintain sample preservation requirements.
- Pre-cleaned, appropriate composite containers will be used in the composite sampler. Even if no sample is collected, the sample container will be replaced with a new sample container daily.
- Composite samples will be split at the SCRWRF laboratory into the appropriate sample containers. Samples will be transported to the analytical laboratory on ice in an ice chest.
- The actual start and stop time and number of sample aliquots collected will be noted on the chain-of-custody forms. Unusual condition(s) and flow conditions will be noted on a field log attached to the chain-of-custody form.

Grab Sampling Procedures

Grab samples will be collected directly into the sample containers using the composite sampler set-up (i.e., through tubing) due to the depth of the wastewater level from the surface. Sample containers will be stored and transported in an ice chest.

Unusual Sampling Conditions Procedures

- If a composite sampler malfunctions or does not collect a sample, determine the cause and correct. If the cause cannot be quickly and definitively determined, use the back-up composite sampler for sample collection. Switch the intake tubing to the back-up composite sampler. Complete the chain-of-custody form as filed and note all observed conditions. Reschedule the sample collection for the following week on the same day with the same settings. Use the same intake tubing, types of containers, procedures, etc. as used during the initial sample collection events.
- If the composite sampler collects low sample volume (e.g., less than 75 percent of the sample container volume), determine the cause. If the cause cannot be determined, replace the composite sampler with the back-up composite sampler for sample collection and note on the chain-of-custody form. Switch the intake tubing to the back-up composite sampler. Complete the chain-of-custody form as filed and note all observed conditions. Reschedule the sample collection for the following week on the same day

with the same settings. Use the same intake tubing, types of containers, procedures, etc. as used during the initial sample collection events. Take

the available sample collected to the SCRWRF laboratory and split into the appropriate sample containers. Determine if the sample(s) will be submitted for analyses. Composite sample analysis priority is as follows:

- Metals
- Chloride/Sodium/Sulfate as SO₄/TDS
- BOD/TSS
- In the event there is only one person at the sampling location, servicing the sample and restarting for the next sample is the priority within the time frame allotted. If warranted, grab sample(s) can be delayed to accommodate these other tasks first. Provide a note on the chain-of-custody form or field log.
- If sample is compromised during splitting at the SCRWRF laboratory or damaged in transit, a resampling event will be scheduled for the following week (same day and settings).

Cleaning Instructions for Composite Samplers at the SCRWRF

- Pre-cleaned, appropriate composite sample containers will be used. Even if no sample is collected, the sample container will be replaced with a new sample container daily.
- All tubing will be replaced with clean tubing prior to initiation of local limits sampling.
- Metal strainers will not be used.
- Sampling cup will be acid-washed with a 1% HCl solution by soaking for one hour in 1% HCl solution followed by triple rinsing with laboratory-grade de-ionized water and allowed to air-dry.
- Re-assemble sampling cup to the composite sampler prior to initial start-up.

Pollutant Data

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Influent	Antimony	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Influent	Arsenic	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Barium	12/18/18	99	10		ug/L	EPA 200.7	Alpha
Influent	Beryllium	12/18/18	< 1	1		ug/L	EPA 200.7	Alpha
Influent	Cadmium	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Chromium	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Cobalt	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Copper	12/18/18	110	20		ug/L	EPA 200.7	Alpha
Influent	Lead	12/18/18	< 50	50		ug/L	EPA 200.7	Alpha
Influent	Mercury	12/18/18	< 0.2	0.2		ug/L	EPA 245.1	Alpha
Influent	Molybdenum	12/18/18	< 500	500		ug/L	EPA 200.7	Alpha
Influent	Nickel	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Selenium	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Influent	Silver	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Influent	Thallium	12/18/18	< 200	200		ug/L	EPA 200.7	Alpha
Influent	Vanadium	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Influent	Zinc	12/18/18	190	20		ug/L	EPA 200.7	Alpha
Influent	Biochemical Oxygen Demand	12/18/18	280	5		mg/L	SM 5210B	Alpha
Influent	Total Suspended Solids	12/18/18	210	1		mg/L	SM 2540D	Alpha
Influent	Oil and Grease	12/18/18	5	5		mg/L	EPA 1664A	Alpha
Influent	Cyanide	12/18/18	< 20	20		ug/L	10-204-00-1X	Alpha
Influent	Acetone	12/18/18	220	25		ug/L	EPA 624	Alpha
Influent	Benzene	12/18/18	< 1.5	1.5		ug/L	EPA 624	Alpha
Influent	Bromodichloromethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Bromoform	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Methyl bromide	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Carbon tetrachloride	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Chlorobenzene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Chloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Chloroform	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Dibromochloromethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,2-Dibromoethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,2-Dichlorobenzene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,3-Dichlorobenzene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,4-Dichlorobenzene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,1-Dichloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,2-Dichloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha

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Influent	1,1-Dichloroethylene	12/18/18	<	2.5	2.5		ug/L	EPA 624	Alpha
Influent	cis-1,2-Dichloroethylene	12/18/18	<	2.5	2.5		ug/L	EPA 624	Alpha

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Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Influent	trans-1,2-Dichloroethylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,2-Dichloropropane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	cis-1,3-Dichloropropylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	trans-1,3-Dichloropropylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Ethylbenzene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Methyl ethyl ketone	12/18/18	9.2	5		ug/L	EPA 624	Alpha
Influent	Methyl isobutyl ketone	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Methylene chloride	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Styrene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,1,2,2-Tetrachloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Tetrachloroethylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Toluene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,1,1-Trichloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	1,1,2-Trichloroethane	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Trichloroethylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Vinyl chloride	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Xylene	12/18/18	< 2.5	2.5		ug/L	EPA 624	Alpha
Influent	Aldrin	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	alpha-BHC	12/18/18	< 0.1	0.1		ug/L	EPA 608	Alpha
Influent	beta-BHC	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	gamma-BHC	12/18/18	< 0.1	0.1		ug/L	EPA 608	Alpha
Influent	delta-BHC	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	Chlordane	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	4,4'-DDD	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	4,4'-DDE	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	4,4'-DDT	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	Dieldrin	12/18/18	< 0.1	0.1		ug/L	EPA 608	Alpha
Influent	Endosulfan I	12/18/18	< 0.1	0.1		ug/L	EPA 608	Alpha
Influent	Endosulfan II	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	Endosulfan sulfate	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	Endrin	12/18/18	< 0.1	0.1		ug/L	EPA 608	Alpha
Influent	Endrin aldehyde	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Influent	Heptachlor	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	Heptachlor epoxide	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	Methoxychlor	12/18/18	< 0.2	0.2		ug/L	EPA 608	Alpha
Influent	Toxaphene	12/18/18	< 5	5		ug/L	EPA 608	Alpha
Influent	PCB 1016	12/18/18	< 5	5		ug/L	EPA 608	Alpha

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Influent	PCB 1221	12/18/18	<	5	5		ug/L	EPA 608	Alpha
Influent	PCB 1232	12/18/18	<	5	5		ug/L	EPA 608	Alpha

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Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Influent	PCB 1242	12/18/18	< 5	5		ug/L	EPA 608	Alpha
Influent	PCB 1248	12/18/18	< 5	5		ug/L	EPA 608	Alpha
Influent	PCB 1254	12/18/18	< 5	5		ug/L	EPA 608	Alpha
Influent	PCB 1260	12/18/18	< 5	5		ug/L	EPA 608	Alpha
Influent	Acenaphthene	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Acenaphthylene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Anthracene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Benzoic acid	12/18/18	740	400		ug/L	EPA 625	Alpha
Influent	Benzo(a)anthracene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Benzo(a)pyrene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Benzo(b)fluoranthene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Benzo(g,h,i)perylene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Benzo(k)fluoranthene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Bis(2-chloroethoxy)methane	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Bis(2-chloroethyl)ether	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Bis(2-chloroisopropyl)ether	12/18/18	< 40	40		ug/L	EPA 625	Alpha
Influent	Bis(2-ethylhexyl)adipate	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Bis(2-ethylhexyl)phthalate	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	4-Bromophenyl phenyl ether	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Butyl benzyl phthalate	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	4-Chloro-3-methylphenol	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	2-Chloronaphthalene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	2-Chlorophenol	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	4-Chlorophenyl phenyl ether	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Chrysene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Dibenzo(a,h)anthracene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	2,4-Dichlorophenol	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Diethyl phthalate	12/18/18	< 40	40		ug/L	EPA 625	Alpha
Influent	2,4-Dimethylphenol	12/18/18	< 40	40		ug/L	EPA 625	Alpha
Influent	Dimethyl phthalate	12/18/18	< 40	40		ug/L	EPA 625	Alpha
Influent	Di-n-butyl phthalate	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	4,6-Dinitro-2-methylphenol	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	2,4-Dinitrophenol	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	2,4-Dinitrotoluene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	2,6-Dinitrotoluene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Di-n-octyl phthalate	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	1,2-Diphenylhydrazine	12/18/18	< 20	20		ug/L	EPA 625	Alpha

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Influent	Fluoranthene	12/18/18	<	20	20		ug/L	EPA 625	Alpha
Influent	Fluorene	12/18/18	<	200	200		ug/L	EPA 625	Alpha

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Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Influent	Hexachlorobenzene	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Hexachlorobutadiene	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Hexachlorocyclopentadiene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Hexachloroethane	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Indeno(1,2,3-cd)pyrene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Isophorone	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Naphthalene	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Nitrobenzene	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	2-Nitrophenol	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	4-Nitrophenol	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	N-nitrosodimethylamine	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	N-nitrosodi-n-propylamine	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	N-nitrosodiphenylamine	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Influent	Pentachlorophenol	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Phenanthrene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	Phenol	12/18/18	22	20		ug/L	EPA 625	Alpha
Influent	Pyrene	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	1,2,4-Trichlorobenzene	12/18/18	< 100	100		ug/L	EPA 625	Alpha
Influent	2,4,6-Trichlorophenol	12/18/18	< 200	200		ug/L	EPA 625	Alpha
Influent	Benzidine	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Influent	3,3'-Dichlorobenzidine	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Antimony	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Effluent	Arsenic	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Barium	12/18/18	73	10		ug/L	EPA 200.7	Alpha
Effluent	Beryllium	12/18/18	< 1	1		ug/L	EPA 200.7	Alpha
Effluent	Cadmium	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Chromium	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Cobalt	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Copper	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Effluent	Lead	12/18/18	< 50	50		ug/L	EPA 200.7	Alpha
Effluent	Mercury	12/18/18	< 200	200		ug/L	EPA 245.1	Alpha
Effluent	Molybdenum	12/18/18	< 500	500		ug/L	EPA 200.7	Alpha
Effluent	Nickel	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Selenium	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha
Effluent	Silver	12/18/18	< 10	10		ug/L	EPA 200.7	Alpha
Effluent	Thallium	12/18/18	< 200	200		ug/L	EPA 200.7	Alpha
Effluent	Vanadium	12/18/18	< 20	20		ug/L	EPA 200.7	Alpha

Local Limits Sampling Plan

Effluent	Zinc	12/18/18		56	20		ug/L	EPA 200.7	Alpha
Effluent	Biochemical Oxygen Demand	12/18/18	<	5	5		mg/L	SM 5210B	Alpha

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Effluent	Total Suspended Solids	12/18/18	1.8	1		mg/L	SM 2540D	Alpha
Effluent	Oil and Grease	12/18/18	< 5	5		mg/L	EPA 1664A	Alpha
Effluent	Cyanide	12/18/18	< 20	20		ug/L	10-204-00-1X	Alpha
Effluent	Acetone	12/18/18	< 5	5		ug/L	EPA 624	Alpha
Effluent	Benzene	12/18/18	< 0.3	0.3		ug/L	EPA 624	Alpha
Effluent	Bromodichloromethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Bromoform	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Methyl bromide	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Carbon tetrachloride	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Chlorobenzene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Chloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Chloroform	12/18/18	1.4	0.5		ug/L	EPA 624	Alpha
Effluent	Dibromochloromethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,2-Dibromoethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,2-Dichlorobenzene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,3-Dichlorobenzene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,4-Dichlorobenzene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,1-Dichloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,2-Dichloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,1-Dichloroethylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	cis-1,2-Dichloroethylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	trans-1,2-Dichloroethylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,2-Dichloropropane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	cis-1,3-Dichloropropylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	trans-1,3-Dichloropropylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Ethylbenzene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Methyl ethyl ketone	12/18/18	< 1	1		ug/L	EPA 624	Alpha
Effluent	Methyl isobutyl ketone	12/18/18	< 1	1		ug/L	EPA 624	Alpha
Effluent	Methylene chloride	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Styrene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,1,2,2-Tetrachloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Tetrachloroethylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Toluene	12/18/18	< 0.3	0.3		ug/L	EPA 624	Alpha
Effluent	1,1,1-Trichloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	1,1,2-Trichloroethane	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Trichloroethylene	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Vinyl chloride	12/18/18	< 0.5	0.5		ug/L	EPA 624	Alpha

Local Limits Sampling Plan

Effluent	Xylene	12/18/18	<	0.5	0.5		ug/L	EPA 624	Alpha
Effluent	Aldrin	12/18/18	<	0.05	0.05		ug/L	EPA 608	Alpha

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Effluent	alpha-BHC	12/18/18	< 0.01	0.01		ug/L	EPA 608	Alpha
Effluent	beta-BHC	12/18/18	< 0.05	0.05		ug/L	EPA 608	Alpha
Effluent	gamma-BHC	12/18/18	< 0.01	0.01		ug/L	EPA 608	Alpha
Effluent	delta-BHC	12/18/18	< 0.05	0.05		ug/L	EPA 608	Alpha
Effluent	Chlordane	12/18/18	< 0.05	0.05		ug/L	EPA 608	Alpha
Effluent	4,4'-DDD	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	4,4'-DDE	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	4,4'-DDT	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	Dieldrin	12/18/18	< 0.01	0.01		ug/L	EPA 608	Alpha
Effluent	Endosulfan I	12/18/18	< 0.01	0.01		ug/L	EPA 608	Alpha
Effluent	Endosulfan II	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	Endosulfan sulfate	12/18/18	< 0.05	0.05		ug/L	EPA 608	Alpha
Effluent	Endrin	12/18/18	< 0.01	0.01		ug/L	EPA 608	Alpha
Effluent	Endrin aldehyde	12/18/18	< 0.05	0.05		ug/L	EPA 608	Alpha
Effluent	Heptachlor	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	Heptachlor epoxide	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	Methoxychlor	12/18/18	< 0.02	0.02		ug/L	EPA 608	Alpha
Effluent	Toxaphene	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1016	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1221	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1232	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1242	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1248	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1254	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	PCB 1260	12/18/18	< 0.5	0.5		ug/L	EPA 608	Alpha
Effluent	Acenaphthene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Acenaphthylene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Anthracene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Benzoic acid	12/18/18	< 20	20		ug/L	EPA 625	Alpha
Effluent	Benzo(a)anthracene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Benzo(a)pyrene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Benzo(b)fluoranthene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Benzo(g,h,i)perylene	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Benzo(k)fluoranthene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Bis(2-chloroethoxy)methane	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Bis(2-chloroethyl)ether	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Bis(2-chloroisopropyl)ether	12/18/18	< 2	2		ug/L	EPA 625	Alpha

Local Limits Sampling Plan

Effluent	Bis(2-ethylhexyl)adipate	12/18/18	<	5	5		ug/L	EPA 625	Alpha
Effluent	Bis(2-ethylhexyl)phthalate	12/18/18	<	5	5		ug/L	EPA 625	Alpha

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Effluent	4-Bromophenyl phenyl ether	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Butyl benzyl phthalate	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	4-Chloro-3-methylphenol	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	2-Chloronaphthalene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	2-Chlorophenol	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	4-Chlorophenyl phenyl ether	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Chrysene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Dibenzo(a,h)anthracene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	2,4-Dichlorophenol	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Diethyl phthalate	12/18/18	< 2	2		ug/L	EPA 625	Alpha
Effluent	2,4-Dimethylphenol	12/18/18	< 2	2		ug/L	EPA 625	Alpha
Effluent	Dimethyl phthalate	12/18/18	< 2	2		ug/L	EPA 625	Alpha
Effluent	Di-n-butyl phthalate	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	4,6-Dinitro-2-methylphenol	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	2,4-Dinitrophenol	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	2,4-Dinitrotoluene	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	2,6-Dinitrotoluene	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Di-n-octyl phthalate	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	1,2-Diphenylhydrazine	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Fluoranthene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Fluorene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Hexachlorobenzene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Hexachlorobutadiene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Hexachlorocyclopentadiene	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Hexachloroethane	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Indeno(1,2,3-cd)pyrene	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Isophorone	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Naphthalene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Nitrobenzene	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	2-Nitrophenol	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	4-Nitrophenol	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	N-nitrosodimethylamine	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	N-nitrosodi-n-propylamine	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	N-nitrosodiphenylamine	12/18/18	< 1	1		ug/L	EPA 625	Alpha
Effluent	Pentachlorophenol	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Phenanthrene	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	Phenol	12/18/18	< 1	1		ug/L	EPA 625	Alpha

Local Limits Sampling Plan

Effluent	Pyrene	12/18/18	<	10	10	ug/L	EPA 625	Alpha
Effluent	1,2,4-Trichlorobenzene	12/18/18	<	5	5	ug/L	EPA 625	Alpha

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Effluent	2,4,6-Trichlorophenol	12/18/18	< 10	10		ug/L	EPA 625	Alpha
Effluent	Benzidine	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Effluent	3,3'-Dichlorobenzidine	12/18/18	< 5	5		ug/L	EPA 625	Alpha
Biosolids	Antimony	12/18/18	< 15	15		mg/kg	EPA 6010B	Alpha
Biosolids	Arsenic	12/18/18	< 2	2		mg/kg	EPA 6010B	Alpha
Biosolids	Barium	12/18/18	28	10		mg/kg	EPA 6010B	Alpha
Biosolids	Beryllium	12/18/18	< 0.75	0.75		mg/kg	EPA 6010B	Alpha
Biosolids	Cadmium	12/18/18	< 1	1		mg/kg	EPA 6010B	Alpha
Biosolids	Chromium	12/18/18	16	5		mg/kg	EPA 6010B	Alpha
Biosolids	Cobalt	12/18/18	< 10	10		mg/kg	EPA 6010B	Alpha
Biosolids	Copper	12/18/18	82	10		mg/kg	EPA 6010B	Alpha
Biosolids	Lead	12/18/18	< 5	5		mg/kg	EPA 6010B	Alpha
Biosolids	Mercury	12/18/18	< 0.2	0.2		mg/kg	EPA 7471A	Alpha
Biosolids	Molybdenum	12/18/18	< 5	5		mg/kg	EPA 6010B	Alpha
Biosolids	Nickel	12/18/18	< 10	10		mg/kg	EPA 6010B	Alpha
Biosolids	Selenium	12/18/18	2.2	2		mg/kg	EPA 6010B	Alpha
Biosolids	Silver	12/18/18	< 5	5		mg/kg	EPA 6010B	Alpha
Biosolids	Thallium	12/18/18	< 7	7		mg/kg	EPA 6010B	Alpha
Biosolids	Vanadium	12/18/18	< 5	5		mg/kg	EPA 6010B	Alpha
Biosolids	Zinc	12/18/18	170	10		mg/kg	EPA 6010B	Alpha
Biosolids	Percent moisture	12/18/18	49	0.1		%	SM 2540G	Alpha
Biosolids	Cyanide	12/18/18	< 2	2		mg/kg	EPA 9014	Alpha
Biosolids	Aldrin	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	alpha-BHC	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	beta-BHC	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	gamma-BHC	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	delta-BHC	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Chlordane	12/18/18	< 2	2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	4,4'-DDD	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	4,4'-DDE	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	4,4'-DDT	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Dieldrin	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Endosulfan I	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Endosulfan II	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Endosulfan sulfate	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Endrin	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Endrin aldehyde	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha

Local Limits Sampling Plan

Biosolids	Heptachlor	12/18/18	<	0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Heptachlor epoxide	12/18/18	<	0.05	0.05		mg/kg	EPA 8081A/8082	Alpha

Local Limits Sampling Plan

Sample Location	Pollutant	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory
Biosolids	Methoxychlor	12/18/18	< 0.05	0.05		mg/kg	EPA 8081A/8082	Alpha
Biosolids	Toxaphene	12/18/18	< 2	2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1016	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1221	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1232	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1242	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1248	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1254	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha
Biosolids	PCB 1260	12/18/18	< 0.2	0.2		mg/kg	EPA 8081A/8082	Alpha

USEPA Default Information; Biosolids Disposal Regulations; and NPDES Permit Restrictions

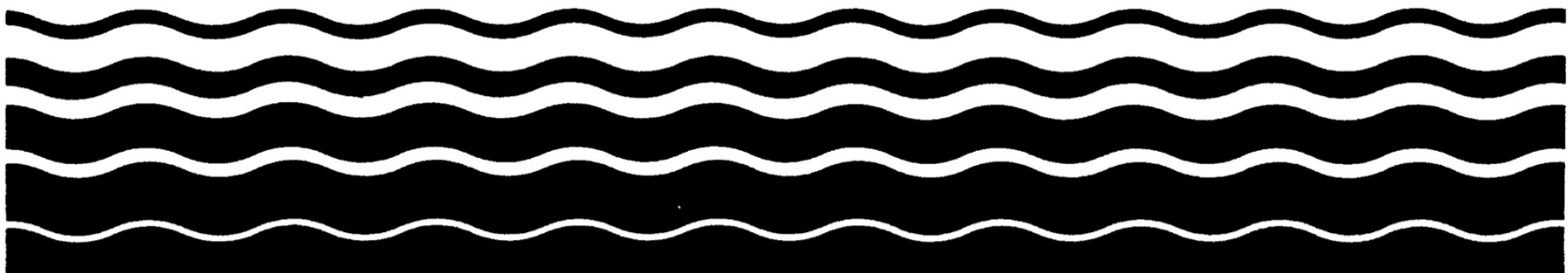
United States
Environmental Protection
Agency

Office of Wastewater
Management 4203

EPA 833-R-04-002B
July 2004



Local Limits Development Guidance Appendices



POLLUTANTS REGULATED BY CATEGORICAL PRETREATMENT STANDARDS

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors
Flow Restrictions Only								X				X								X		X								X					
Ammonia (as N)									X						X				X	X						X	X								
BOD											X																								
COD														X															X						
Fluoride				X		X				X			X						X	X															
Nitrate (as N)									X																										
Oil and Grease	X	X	X	X	X													X						X	X				X				X		
Oil (mineral)										X																									
Organic Nitrogen (as N)									X																										
pH									X				X	X																					
Phenols														X				X	X																
Phosphorus			X					X																											
Sulfide															X																				
TSS											X																								X
1,1-Dichloroethane			X			X											X					X									X				
1,1-Dichloroethylene			X	X	X												X					X		X							X				
1,1,1-Trichloroethane			X	X	X	X											X	X				X		X							X				
1,1,2-Trichloroethane						X	X										X					X									X				
1,1,2,2-Tetrachloroethane			X			X											X														X				
1,2-Dichlorobenzene						X	X										X					X		X		X					X				
1,2-Dichloroethane						X	X										X					X		X		X					X				
1,2-Dichloropropane							X										X					X		X							X				
1,2-Diphenylhydrazine	X					X	X										X														X				
1,2-trans-Dichloroethylene							X										X					X		X							X				

[illegible]

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors
4-Chlorophenyl phenyl ether							X									X															X				
4-Nitrophenol						X	X									X	X					X									X				
4,4-DDD							X									X															X				
4,4-DDE							X									X															X				
4,4-DDT							X									X															X				
4,5,6-Trichloro-quaiacol																												X							
4,6-Dinitro-o-cresol							X									X						X									X				
Acenaphthene	X						X									X	X					X									X				
Acenaphthylene	X						X									X	X														X				
Acetone																										X									
Acrolein							X									X															X				
Acrylonitrile							X									X															X				
Aldrin							X									X															X				
Alpha-BHC							X									X															X				
Alpha-endosulfan							X									X															X				
Anthracene	X					X	X	X								X	X					X								X					
Benzene						X	X									X	X					X		X		X				X					
Benzidine							X									X															X				
Benzo (b) fluoranthene	X						X									X	X														X				
Benzo (a) anthracene							X									X	X														X				
Benzo (ghi) perylene	X						X									X															X				
Benzo (a) pyrene	X						X									X	X		X												X				
Benzo (k) fluoranthene							X									X	X														X				
Beta-BHC							X									X															X				
Beta-endosulfan							X									X															X				
Bis (2-chloro-ethoxy) methane							X									X															X				
Bis (2-chloro-isopropyl) ether							X									X															X				
Bis (2-chloro-ethyl) ether				X			X									X															X				
Bis (2-ethyl-hexyl) phthalate	X		X	X		X	X									X	X					X								X					
Bromoform							X									X								X							X				

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors	
Butyl benzyl phthalate				X		X	X									X	X														X					
Carbon tetrachloride							X	X								X						X		X							X					
Carbazole			X																																	
Chlordane (tech. mix. & metabolites)							X										X														X					
Chlorobenzene							X										X	X				X		X		X					X					
Chlorodibromo-methane							X										X							X							X					
Chloroethane							X										X					X									X					
Chloroform				X	X	X	X										X	X				X		X		X		X			X					
Chrysene	X						X										X	X													X					
Cresol			X																																	
Delta-BHC							X										X														X					
Di-n-butyl phthalate	X			X		X	X										X	X													X					
Di-n-octyl phthalate							X										X														X					
Dibenzo (a,h) anthracene	X						X										X														X					
Dichlorobromo-methane						X	X										X							X							X					
Dieldrin							X										X														X					
Diethyl phthalate	X						X										X	X				X								X						
Diethylamine																											X									
Dimethyl phthalate							X										X	X				X									X					
Endosulfan sulfate	X						X										X														X					
Endrin	X						X										X														X					
Endrin aldehyde	X						X										X														X					
Ethyl acetate																											X									
Ethylbenzene	X					X	X	X									X					X		X						X						
Fluoranthene	X		X				X										X	X				X								X			X			
Fluorene	X						X										X	X				X								X				X		
Gamma-BHC							X										X														X					
Heptachlor epoxide							X										X														X					
Heptachlor							X										X														X					

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors
Hexachlorobenzene							X										X		X		X										X				
Hexachlorobutadiene							X										X														X				
Hexachlorocyclopentadiene							X										X					X									X				
Hexachloroethane							X										X					X									X				
Indeno (1,2,3-cd)pyrene	X						X										X														X				
Isobutylaldehyde																										X									
Isophorone	X						X	X									X														X				
Isopropyl acetate																											X								
Isopropyl ether																											X								
Methyl formate																											X								
Methyl bromide							X										X								X						X				
Methyl cellosolve																										X									
Methyl Isobutyl Ketone																										X									
Methyl chloride							X										X					X		X							X				
Methylene chloride				X	X	X	X										X	X				X		X		X	X				X				
n-Amyl acetate																											X								
n-Butyl acetate																											X								
n-Decane			X																																
n-Heptane																											X								
n-Hexane																											X								
N-nitrosodi-n-propylamine							X										X	X											X						
N-nitrosodimethylamine							X										X	X													X				
N-nitrosodiphenylamine	X				X		X										X	X													X				
n-Octadecane			X																																
Naphthalene	X					X	X	X							X		X	X				X		X							X				
Nitrobenzene							X										X					X									X				
Non-polar material (SGT-HEM)																																	X		
Parachloro-metacresol	X						X										X	X													X				
PCB-1016	X						X										X														X				

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors
PCB-1221	X							X									X														X				
PCB-1232	X							X									X														X				
PCB-1242	X							X									X														X				
PCB-1248	X							X									X														X				
PCB-1254	X							X									X														X				
PCB-1260	X							X									X														X				
Pentachloro-phenol					X		X	X									X	X													X				
Phenanthrene	X				X	X		X									X	X				X								X			X		
Phenol	X						X	X									X	X												X					
Pyrene	X							X									X	X				X								X					
TCDF																													X						
Tetrachloro-catechol																													X						
Tetrachloro-ethylene	X				X		X	X						X			X	X				X		X						X					
Tetrachloro-guaiacol																													X						
Tetrahydrofuran																											X								
Toluene	X				X	X	X	X									X	X				X		X		X				X					
Toxaphene								X									X														X				
Trichloro-ethylene	X					X	X	X									X	X				X								X					
Trichlorosyringol																													X						
Triethylamine																											X								
Vinyl chloride								X									X					X								X					
Xylenes																											X								
2,3,7,8-tetrachloro-dibenzo-p-dioxin								X									X												X		X				
Organic Pesticide Active Ingredients																									X										
Antimony				X			X						X						X	X											X				
Arsenic				X			X						X							X											X	X		X	
Asbestos																															X				
Barium				X																															
Beryllium																																			
Cadmium		X		X			X	X					X			X			X	X											X			X	X
Chromium, Total	X	X		X	X	X	X	X						X	X	X	X		X	X						X		X		X	X	X	X	X	X

	Aluminum Forming	Battery Manufacturing	Carbon Black Manufacturing	Centralized Waste Treatment	Coil Coating	Copper Forming	Electrical and Electronic Components	Electroplating	Feedlots	Fertilizer Manufacturing	Glass Manufacturing	Grain Mills	Ink Formulating	Inorganic Chemicals Manufacturing	Iron and Steel Manufacturing	Leather Tanning and Finishing	Metal Finishing	Metal Molding and Casting	Nonferrous Metals Form./Metal Powders	Nonferrous Metals Manufacturing	Oil and Gas	Organic Chems., Plastics, and Syn. Fibers	Paint Formulating	Paving and Roofing Materials	Pesticide Chemicals	Petroleum Refining	Pharmaceutical Manufacturing	Porcelain Enameling	Pulp, Paper, and Paperboard	Rubber Manufacturing	Soap and Detergent Manufacturing	Steam Electric Power Generating	Timber Products Processing	Transportation Equip. Cleaning	Waste Combustors
Chromium, Hexavalent														X	X																				
Cobalt		X		X										X						X															
Copper		X		X	X	X		X						X			X	X	X	X												X	X	X	X
Cyanide, Total	X	X		X	X			X						X	X		X	X	X	X	X	X			X		X					X			
Cyanide, Amenable														X			X																		
Gold																			X																
Indium																			X																
Iron														X					X																
Lead		X		X		X	X	X						X	X		X	X	X	X	X	X	X		X			X		X		X		X	X
Manganese		X		X										X	X		X	X	X	X					X			X		X					
Mercury		X		X										X					X													X		X	X
Molybdenum				X															X	X															
Nickel		X		X		X		X						X	X		X	X	X	X								X				X		X	
Palladium																			X																
Platinum																			X																
Selenium				X										X					X													X			
Silver		X		X				X						X		X	X	X	X	X												X			X
Tantalum																			X																
Thallium																															X				
Tin				X															X																
Titanium				X															X																X
Tungsten																			X																
Vanadium				X																															
Zinc	X	X		X	X	X	X	X						X	X		X	X	X	X	X	X						X	X	X		X		X	X

Source: Updated from the 1991 *National Pretreatment Program Report to Congress*, pp. 5-6.

APPENDIX G - LITERATURE INHIBITION VALUES

Pollutant	Reported Range of <u>Activated Sludge</u> Inhibition Threshold Levels, mg/L	References*
METALS/NONMETAL INORGANICS		
Ammonia	480	(4)
Arsenic	0.1	(1), (2), (3)
Cadmium	1 - 10	(2), (3)
Chromium (VI)	1	(2), (3)
Chromium (III)	10 - 50	(2), (3)
Chromium (Total)	1 - 100	(1)
Copper	1	(2), (1), (3)
Cyanide	0.1 - 5 5	(1), (2), (3) (1)
Iodine	10	(4)
Lead	1.0 - 5.0 10 - 100	(3) (1)
Mercury	0.1 - 1 2.5 as Hg (II)	(2), (3) (1)
Nickel	1.0 - 2.5 5	(2), (3) (1)
Sulfide	25 - 30	(4)
Zinc	0.3 - 5 5 - 10	(3) (1)
ORGANICS		
Anthracene	500	(1)
Benzene	100 - 500 125 - 500	(3) (1)
2-Chlorophenol	5 20 - 200	(2) (3)
1,2 Dichlorobenzene	5	(2)
1,3 Dichlorobenzene	5	(2)
1,4 Dichlorobenzene	5	(2)
2,4-Dichlorophenol	64	(3)
2,4 Dimethylphenol	40 - 200	(3)
2,4 Dinitrotoluene	5	(2)
1,2-Diphenylhydrazine	5	(2)
Ethylbenzene	200	(3)
Hexachlorobenzene	5	(2)
Naphthalene	500 500 500	(1) (2) (3)

Nitrobenzene	30 - 500 500 500	(3) (1) (2)

Pollutant	Reported Range of <u>Activated Sludge</u> Inhibition Threshold Levels, mg/L	References*
Pentachlorophenol	0.95 50 75 - 150	(2) (3) (1)
Phenanthrene	500 500	(1) (2)
Phenol	50 - 200 200 200	(3) (2) (1)
Toluene	200	(3)
2,4,6 Trichlorophenol	50 - 100	(1)
Surfactants	100 - 500	(4)

Pollutant	Reported Range of <u>Trickling Filter</u> Inhibition Threshold Levels, mg/L	References*
Chromium (III)	3.5 - 67.6	(1)
Cyanide	30	(1)

Pollutant	Reported Range of <u>Nitrification</u> Inhibition Threshold Levels, mg/L	References*
METALS/NONMETAL INORGANICS		
Arsenic	1.5	(2)
Cadmium	5.2	(1), (2)
Chloride	180	(4)
Chromium (VI)	1 - 10 [as (CrO ₄) ₂]	(1)
Chromium (T)	0.25 - 1.9 1 - 100 (trickling filter)	(1), (2), (3) (1)
Copper	0.5 - 0.48	(2), (3)
Cyanide	0.34 - 0.5	(2), (3)
Lead	0.5	(2), (3)
Nickel	0.25 - 0.5 5	(2), (3) (1)
Zinc	0.8 - 0.5	(2), (3)
ORGANICS		
Chloroform	10	(2)
2,4-Dichlorophenol	64	(3)
2,4-Dinitrophenol	150	(2)
Phenol	4 4 - 10	(2) (3)

Pollutant	Reported Range of <u>Anaerobic Digestion</u> Inhibition Threshold Levels, mg/L	References*
METALS/NONMETAL INORGANICS		
Ammonia	1500 - 8000	(4)
Arsenic	1.6	(1)
Cadmium	20	(3)
Chromium (III)	130	(3)
Chromium (VI)	110	(3)
Copper	40	(3)
Cyanide	4 - 100 1 - 4	(1) (2), (3)
Lead	340	(3)
Nickel	10 136	(2), (3) (1)
Silver	13 - 65**	(3)
Sulfate	500 - 1000	(4)
Sulfide	50 - 100	(4)
Zinc	400	(3)
ORGANICS		
Acrylonitrile	5 5	(3) (2)
Carbon Tetrachloride	2.9 - 159.4 10 - 20 2.0	(1) (3) (2)
Chlorobenzene	0.96 - 3 0.96	(1) (2)
Chloroform	1 5 - 16 10 - 16	(2) (1) (3)
1,2-Dichlorobenzene	0.23 - 3.8 0.23	(1) (2)
1,4-Dichlorobenzene	1.4 - 5.3 1.4	(1) (2)
Methyl chloride	3.3 - 536.4 100	(1) (2)
Pentachlorophenol	0.2 0.2 - 1.8	(2) (1)
Tetrachloroethylene	20	(2)
Trichloroethylene	1 - 20 20 20	(1) (2) (3)
Trichlorofluoromethane	-	(2)

* Total pollutant inhibition levels, unless otherwise indicated.

** Dissolved metal inhibition levels.

- (1) Jenkins, D.I., and Associates. 1984. *Impact of Toxics on Treatment Literature Review*.

- (2) Russell, L. L., C. B. Cain, and D.I. Jenkins. 1984. *Impacts of Priority Pollutants on Publicly Owned Treated Works Processes: A Literature Review*. 1984 Purdue Industrial Waste Conference.
- (3) Anthony, R. M., and L. H. Briemburst. 1981. *Determining Maximum Influent Concentrations of Priority Pollutants for Treatment Plants*. Journal Water Pollution Control Federation 53(10):1457-1468.
- (4) U.S. EPA. 1986, *Working Document; Interferences at Publicly Owned Treatment Works*. September 1986.

Source: *EPA's Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program*, December 1987, pp. 3-44 to 3-49.



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22 CA ADC § 66261.24

22 CCR § 66261.24

Cal. Admin. Code tit. 22, § 66261.24

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
TITLE 22. SOCIAL SECURITY
DIVISION 4.5. ENVIRONMENTAL HEALTH STANDARDS FOR THE MANAGEMENT OF HAZARDOUS
WASTE
CHAPTER 11. IDENTIFICATION AND LISTING OF HAZARDOUS WASTE
ARTICLE 3. CHARACTERISTICS OF HAZARDOUS WASTE
This database is current through 5/2/08, Register 2008, No. 18
§ 66261.24. Characteristic of Toxicity.

(a) A waste exhibits the characteristic of toxicity if representative samples of the waste have any of the following properties:

(1) when using the Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, third edition and Updates (incorporated by reference in section 66260.11 of this division), the extracts from representative samples of the waste contain any of the contaminants listed in Table I of this section at a concentration equal to or greater than the respective value given in that table unless the waste is excluded from classification as a solid waste or hazardous waste or is exempted from regulation pursuant to 40 CFR section 261.4. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering using the methodology outlined in Method 1311, is considered to be the extract for the purposes of this section;

(A) a waste that exhibits the characteristic of toxicity pursuant to subsection (a)(1) of this section has the EPA Hazardous Waste Number specified in Table I of this section which corresponds to the toxic contaminant causing it to be hazardous;

(B) Table I - Maximum Concentration of Contaminants for the Toxicity Characteristic:

EPA Hazardous Waste Number	Contaminant	Abstracts	Chemical Regulatory	
			Service Number	Level Mg/l
D004	Arsenic		7440-38-2	5.0
D005	Barium		7440-39-3	100.0
D018	Benzene		71-43-2	0.5
D006	Cadmium		7440-43-9	1.0
D019	Carbon tetrachloride		56-23-5	0.5
D020	Chlordane	57-74-9	0.03	

D021	Chlorobenzene	108-90-7	100.0
D022	Chloroform	67-66-3	6.0
D007	Chromium	7440-47-3	5.0
D023	o-Cresol	95-48-7	200.0 [FN1]
D024	m-Cresol	108-39-4	200.0 [FN1]
D025	p-Cresol	106-44-5	200.0 [FN1]
D026	Cresol		200.0 [FN1]
D016	2,4-D	94-75-7	10.0
D027	1,4-Dichlorobenzene	106-46-7	7.5
D028	1,2-Dichloroethane	107-06-2	0.5
D029	1,1-Dichloroethylene	75-35-4	0.7
D030	2,4-Dinitrotoluene	121-14-2	0.13
D012	Endrin	72-20-8	0.02
D031	Heptachlor (and its epoxide)	76-44-8	0.008
D032	Hexachlorobenzene	118-74-1	0.13
D033	Hexachlorobutadiene	87-68-3	0.5
D034	Hexachloroethane	67-72-1	3.0
D008	Lead	7439-92-1	5.0
D013	Lindane	58-89-9	0.4
D009	Mercury	7439-97-6	0.2
D014	Methoxychlor	72-43-5	10.0
D035	Methyl ethyl ketone	78-93-3	200.0
D036	Nitrobenzene	98-95-3	2.0
D037	Pentachlorophenol	87-86-5	100.0
D038	Pyridine	110-86-1	5.0 [FN2]
D010	Selenium	7782-49-2	1.0
D011	Silver	7440-22-4	5.0
D039	Tetrachloroethylene	127-18-4	0.7
D015	Toxaphene	8001-35-2	0.5
D040	Trichloroethylene	79-01-6	0.5
D041	2,4,5-Trichlorophenol	95-95-4	400.0
D042	2,4,6-Trichlorophenol	88-06-2	2.0
D017	2,4,5-TP (Silvex)	93-72-1	1.0
D043	Vinyl chloride	75-01-4	0.2

[FN1]1 If o-, m- and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

[FN2]2 Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level .

(2) it contains a substance listed in subsections (a)(2)(A) or (a)(2)(B) of this section at a concentration in milligrams per liter of waste extract, as determined using the Waste Extraction Test (WET) described in Appendix II of this chapter, which equals or exceeds its listed soluble threshold limit concentration or at a concentration in milligrams per kilogram in the waste which equals or exceeds its listed total threshold limit concentration;

(A) Table II - List of Inorganic Persistent and Bioaccumulative Toxic Substances and Their Soluble Threshold Limit Concentration:

(STLC) and Total Threshold Limit Concentration (TTLC) Values.

STLC Wet-Weight mg/kg	Substance [FNa], [FNb]		TTLc mg/l
Antimony and/or antimony compounds		15	500
Arsenic and/or arsenic compounds		5.0	500
Asbestos			1.0
(as percent) Barium and/or barium compounds (excluding barite)	100	10,000 [FNc]	Beryllium and/or
beryllium compounds	0.75	75	Cadmium and/or
cadmium compounds	1.0	100	Chromium
(VI) compounds	5	500	Chromium and/or
chromium (III) compounds	5 [FNd]	2,500	Cobalt
and/or cobalt compounds		80	8,000
and/or copper compounds			25
Fluoride salts		180	18,000
and/or lead compounds		5.0	1,000
and/or mercury compounds		0.2	20
and/or molybdenum compounds		350	3,500 [FNe]
and/or nickel compounds		20	2,000
and/or selenium compounds		1.0	100
and/or silver compounds		5	500
and/or thallium compounds		7.0	700
and/or vanadium compounds		24	2,400
and/or zinc compounds			250
			5,000

[FNa]a STLC and TTLc values are calculated on the concentrations of the elements, not the compounds.

[FNb]b In the case of asbestos and elemental metals, the specified concentration limits apply only if the substances are in a friable, powdered or finely divided state. Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite. In the case of asbestos and elemental metals, the specified concentration limits apply only if the substances are in a friable, powdered or finely divided state. Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite. In the case of asbestos and elemental metals, the specified concentration limits apply only if the substances are in a friable, powdered or finely divided state. Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite.

[FNc]c excluding barium sulfate.

[FNd]d If the soluble chromium, as determined by the TCLP set forth in Appendix I of chapter 18 of this division, is less than 5 mg/l, and the soluble chromium, as determined by the procedures set forth in Appendix II of chapter 11, equals or exceeds 560 mg/l and the waste is not otherwise identified as a RCRA hazardous waste pursuant to section 66261.100, then the waste is a non- RCRA hazardous waste.

[FNe]e Excluding molybdenum disulfide.

(B) Table III - List of Organic Persistent and Bioaccumulative Toxic Substances and Their Soluble Threshold Limit Concentration (STLC) and Total Threshold Limit Concentration (TTLC) Values:

STLC Wet Weight mg/kg	Substance		TTLC mg/l
Aldrin		0.14	1.4
Chlordane		0.25	2.5
DDT, DDE, DDD	0.1	1.0	2,4-
Dichlorophenoxyacetic acid		10	100
Dieldrin	0.8	8.0	Dioxin
(2,3,7,8-TCDD)		0.001	0.01
Endrin		0.02	0.2
Heptachlor		0.47	4.7
Kepone	2.1	21	Lead
compounds, organic		-	13
Lindane		0.4	4.0
Methoxychlor		10	100
Mirex		2.1	21
Pentachlorophenol		1.7	17
Polychlorinated biphenyls (PCBs)		5.0	50
Toxaphene		0.5	5
Trichloroethylene	204	2,040	2,4,5-
Trichlorophenoxypropionic acid		1.0	10

(3) it has an acute oral LD 50 less than 2,500 milligrams per kilogram;

(4) it has an acute dermal LD 50 less than 4,300 milligrams per kilogram;

(5) it has an acute inhalation LC 50 less than 10,000 parts per million as a gas or vapor;

(6) it has an acute aquatic 96-hour LC 50 less than 500 milligrams per liter when measured in soft water (total hardness 40 to 48 milligrams per liter of calcium carbonate) with fathead minnows (*Pimephales promelas*), rainbow trout (*Salmo gairdneri*) or golden shiners (*Notemigonus crysoleucas*) according to procedures described in Part 800 of the "Standard Methods for the Examination of Water and Wastewater (16th Edition)," American Public Health Association, 1985 and "Static Acute Bioassay Procedures for Hazardous Waste Samples," California Department of Fish and Game, Water Pollution Control Laboratory, revised November 1988 (incorporated by reference, see section 66260.11), or by other test methods or test fish approved by the Department, using test samples prepared or meeting the conditions for testing as prescribed in subdivisions (c) and (d) of Appendix II of this chapter, and solubilized, suspended, dispersed or emulsified by the cited procedures or by other methods approved by the Department;

(7) it contains any of the following substances at a single or combined concentration equal to or exceeding 0.001 percent by weight:

(A) 2-Acetylaminofluorene (2-AAF);

(B) Acrylonitrile;

(C) 4-Aminodiphenyl;

(D) Benzidine and its salts;

(E) bis (Chloromethyl) ether (BCME);

(F) Methyl chloromethyl ether;

(G) 1,2-Dibromo-3-chloropropane (DBCP);

(H) 3,3'-Dichlorobenzidine and its salts (DCB);

(I) 4-Dimethylaminoazobenzene (DAB);

(J) Ethyleneimine (EL);

(K) alpha-Naphthylamine (1-NA);

(L) beta-Naphthylamine (2-NA);

(M) 4-Nitrobiphenyl (4-NBP);

(N) N-Nitrosodimethylamine (DMN);

(O) beta-Propiolactone (BPL);

(P) Vinyl chloride (VCM);

(8) it has been shown through experience or testing to pose a hazard to human health or environment because of its carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties or persistence in the environment.

(b) A waste containing one or more materials which exhibit the characteristic of toxicity because the materials have the property specified in subsection (a)(5) of this section may be classified as nonhazardous pursuant to section 66260.200 if the waste does not exhibit any other

characteristic of this article and is not listed in article 4 of this chapter and its head space vapor contains no such toxic materials in concentrations exceeding their respective acute inhalation LC 50 or their LC LO. The head space vapor of a waste shall be prepared, and two milliliters of it shall be sampled using a five milliliter gas-tight syringe, according to Method 5020 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 2nd edition, U.S. Environmental Protection Agency, 1982 (incorporated by reference, see section 66260.11). The quantity in milligrams of each material, which exhibits the characteristic of toxicity because it has the property specified in subsection (a)(5) of this section, in the sampling syringe shall be determined by comparison to liquid standard solutions according to the appropriate gas chromatographic procedures in Method 8010, 8015, 8020, 8030 or 8240 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11). The concentration of each material in the head space vapor shall be calculated using the following equation:

$$C_A = \frac{Q_A}{MW} \times \frac{29.8 \text{ ml}}{\text{mmole}} \times \frac{1}{2 \times 10^{-6} \text{ M}^3}$$

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where C (in parts per million) is the concentration of material A in head space vapor, Q (in milligrams) is the quantity of material A in sampling syringe and MW (in milligrams per millimole) is the molecular weight of material A. Where an acute inhalation LC 50 is not available, an LC 50 measured for another time (t) may be converted to an eight-hour value with the following equation:

Eight-hour LC 50 = (t/8) x (t-hour LC 50).

(c) A waste containing one or more materials which exhibit the characteristic of toxicity because the materials have either of the properties specified in subsection (a)(3) or (a)(4) of this section may be classified as nonhazardous pursuant to section 66260.200 if the waste does not exhibit any other characteristic of this article and is not listed in article 4 of this chapter and the calculated oral LD 50 of the waste mixture is greater than 2,500 milligrams per kilogram and the calculated dermal LD 50 is greater than 4,300 milligrams per kilogram by the following equation:

$$\text{Calculated oral or dermal LD}_{50} = \frac{100\%}{\sum_{x=1}^n \frac{\% A_x}{T A_x}}$$

Image 2 (0.75" X 3.25") Not available for Offline Print to STP or FAX

where %A x is the weight percent of each component in the waste mixture and [FNT]A x is the acute oral or dermal LD 50 or the acute oral LD LO of each component.

Note: Authority cited: Sections 25141, 25159, 58004 and 58012, Health and Safety Code.
Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.24.

HISTORY

1. New section filed 5-24-91; effective 7-1-91 (Register 91, No. 22).
2. Amendment of table II filed 1-31-94; operative 1-31-94 (Register 94, No. 5).
3. Editorial correction of equation (Register 95, No. 36).
4. Amendment of subsection (a)(1) and Note filed 10-13-98; operative 11-12-98 (Register 98, No. 42).
5. Change without regulatory effect amending subsections (a)(3) and (c) filed 6-3-2004 pursuant to section 100, title 1, California Code of Regulations (Register 2004, No. 23).

22 CCR § 66261.24, 22 CA ADC § 66261.24
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22 CA ADC § 66261.24

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Title 40 → Chapter I → Subchapter O → Part 503 → Subpart B

Title 40: Protection of Environment

PART 503—STANDARDS FOR THE USE OR DISPOSAL OF SEWAGE SLUDGE

Subpart B—Land Application

Contents

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 - §503.12 General requirements.
 - §503.13 Pollutant limits.
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§503.10 Applicability.

(a) This subpart applies to any person who prepares sewage sludge that is applied to the land, to any person who applies sewage sludge to the land, to sewage sludge applied to the land, and to the land on which sewage sludge is applied.

(b)(1) *Bulk sewage sludge.* The general requirements in §503.12 and the management practices in §503.14 do not apply when bulk sewage sludge is applied to the land if the bulk sewage sludge meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8).

(2) The Regional Administrator of EPA or, in the case of a State with an approved sludge management program, the State Director, may apply any or all of the general requirements in §503.12 and the management practices in §503.14 to the bulk sewage sludge in §503.10(b) (1) on a case-by-case basis after determining that the general requirements or management practices are needed to protect public health and the environment from any reasonably anticipated adverse effect that may occur from any pollutant in the bulk sewage sludge.

(c)(1) The general requirements in §503.12 and the management practices in §503.14

do not apply when a bulk material derived from sewage sludge is applied to the land if the derived bulk material meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8).

(2) The Regional Administrator of EPA or, in the case of a State with an approved sludge management program, the State Director, may apply any or all of the general requirements in §503.12 or the management practices in §503.14 to the bulk material in §503.10(c)(1) on a case-by-case basis after determining that the general requirements or management practices are needed to protect public health and the environment from any reasonably anticipated adverse effect that may occur from any pollutant in the bulk sewage sludge.

(d) The requirements in this subpart do not apply when a bulk material derived from sewage sludge is applied to the land if the sewage sludge from which the bulk material is derived meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8).

(e) Sewage sludge sold or given away in a bag or other container for application to the land. The general requirements in §503.12 and the management practices in §503.14 do not apply when sewage sludge is sold or given away in a bag or other container for application to the land if the sewage sludge sold or given away in a bag or other container for application to the land meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8).

(f) The general requirements in §503.12 and the management practices in §503.14 do not apply when a material derived from sewage sludge is sold or given away in a bag or other container for application to the land if the derived material meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8).

(g) The requirements in this subpart do not apply when a material derived from sewage sludge is sold or given away in a bag or other container for application to the land if the sewage sludge from which the material is derived meets the ceiling concentrations in Table 1 of §503.13 and the pollutant concentrations in Table 3 of §503.13; the Class A pathogen requirements in §503.32(a); and one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8).

[58 FR 9387, Feb. 19, 1993, as amended at 64 FR 42568, Aug. 4, 1999]

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§503.11 Special definitions.

(a) *Agricultural land* is land on which a food crop, a feed crop, or a fiber crop is grown. This includes range land and land used as pasture.

(b) *Agronomic rate* is the whole sludge application rate (dry weight basis) designed:

(1) To provide the amount of nitrogen needed by the food crop, feed crop, fiber crop, cover crop, or vegetation grown on the land; and

(2) To minimize the amount of nitrogen in the sewage sludge that passes below the root zone of the crop or vegetation grown on the land to the ground water.

(c) *Annual pollutant loading rate* is the maximum amount of a pollutant that can be applied to a unit area of land during a 365 day period.

(d) *Annual whole sludge application rate* is the maximum amount of sewage sludge (dry weight basis) that can be applied to a unit area of land during a 365 day period.

(e) *Bulk sewage sludge* is sewage sludge that is not sold or given away in a bag or other container for application to the land.

(f) *Cumulative pollutant loading rate* is the maximum amount of an inorganic pollutant that can be applied to an area of land.

(g) *Forest* is a tract of land thick with trees and underbrush.

(h) *Land application* is the spraying or spreading of sewage sludge onto the land surface; the injection of sewage sludge below the land surface; or the incorporation of sewage sludge into the soil so that the sewage sludge can either condition the soil or fertilize crops or vegetation grown in the soil.

(i) *Monthly average* is the arithmetic mean of all measurements taken during the month.

(j) *Other container* is either an open or closed receptacle. This includes, but is not limited to, a bucket, a box, a carton, and a vehicle or trailer with a load capacity of one metric ton or less.

(k) *Pasture* is land on which animals feed directly on feed crops such as legumes, grasses, grain stubble, or stover.

(l) *Public contact site* is land with a high potential for contact by the public. This includes, but is not limited to, public parks, ball fields, cemeteries, plant nurseries, turf farms, and golf courses.

(m) *Range land* is open land with indigenous vegetation.

(n) *Reclamation site* is drastically disturbed land that is reclaimed using sewage sludge. This includes, but is not limited to, strip mines and construction sites.

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§503.12 General requirements.

(a) No person shall apply sewage sludge to the land except in accordance with the

requirements in this subpart.

(b) No person shall apply bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) to agricultural land, forest, a public contact site, or a reclamation site if any of the cumulative pollutant loading rates in §503.13(b)(2) has been reached.

(c) No person shall apply domestic septage to agricultural land, forest, or a reclamation site during a 365 day period if the annual application rate in §503.13(c) has been reached during that period.

(d) The person who prepares bulk sewage sludge that is applied to agricultural land, forest, a public contact site, or a reclamation site shall provide the person who applies the bulk sewage sludge written notification of the concentration of total nitrogen (as N on a dry weight basis) in the bulk sewage sludge.

(e)(1) The person who applies sewage sludge to the land shall obtain information needed to comply with the requirements in this subpart.

(2)(i) Before bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) is applied to the land, the person who proposes to apply the bulk sewage sludge shall contact the permitting authority for the State in which the bulk sewage sludge will be applied to determine whether bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) has been applied to the site since July 20, 1993.

(ii) If bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) has not been applied to the site since July 20, 1993, the cumulative amount for each pollutant listed in Table 2 of §503.13 may be applied to the site in accordance with §503.13(a)(2)(i).

(iii) If bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) has been applied to the site since July 20, 1993, and the cumulative amount of each pollutant applied to the site in the bulk sewage sludge since that date is known, the cumulative amount of each pollutant applied to the site shall be used to determine the additional amount of each pollutant that can be applied to the site in accordance with §503.13(a)(2)(i).

(iv) If bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) has been applied to the site since July 20, 1993, and the cumulative amount of each pollutant applied to the site in the bulk sewage sludge since that date is not known, an additional amount of each pollutant shall not be applied to the site in accordance with §503.13(a)(2)(i).

(f) When a person who prepares bulk sewage sludge provides the bulk sewage sludge to a person who applies the bulk sewage sludge to the land, the person who prepares the bulk sewage sludge shall provide the person who applies the sewage sludge notice and necessary information to comply with the requirements in this subpart.

(g) When a person who prepares sewage sludge provides the sewage sludge to another

person who prepares the sewage sludge, the person who provides the sewage sludge shall provide the person who receives the sewage sludge notice and necessary information to comply with the requirements in this subpart.

(h) The person who applies bulk sewage sludge to the land shall provide the owner or lease holder of the land on which the bulk sewage sludge is applied notice and necessary information to comply with the requirements in this subpart.

(i) Any person who prepares bulk sewage sludge that is applied to land in a State other than the State in which the bulk sewage sludge is prepared shall provide written notice, prior to the initial application of bulk sewage sludge to the land application site by the applier, to the permitting authority for the State in which the bulk sewage sludge is proposed to be applied. The notice shall include:

(1) The location, by either street address or latitude and longitude, of each land application site.

(2) The approximate time period bulk sewage sludge will be applied to the site.

(3) The name, address, telephone number, and National Pollutant Discharge Elimination System permit number (if appropriate) for the person who prepares the bulk sewage sludge.

(4) The name, address, telephone number, and National Pollutant Discharge Elimination System permit number (if appropriate) for the person who will apply the bulk sewage sludge.

(j) Any person who applies bulk sewage sludge subject to the cumulative pollutant loading rates in §503.13(b)(2) to the land shall provide written notice, prior to the initial application of bulk sewage sludge to a land application site by the applier, to the permitting authority for the State in which the bulk sewage sludge will be applied and the permitting authority shall retain and provide access to the notice. The notice shall include:

(1) The location, by either street address or latitude and longitude, of the land application site.

(2) The name, address, telephone number, and National Pollutant Discharge Elimination System permit number (if appropriate) of the person who will apply the bulk sewage sludge.

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§503.13 Pollutant limits.

(a) *Sewage sludge.* (1) Bulk sewage sludge or sewage sludge sold or given away in a bag or other container shall not be applied to the land if the concentration of any pollutant in the sewage sludge exceeds the ceiling concentration for the pollutant in Table 1 of §503.13.

(2) If bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site, either:

(i) The cumulative loading rate for each pollutant shall not exceed the cumulative

pollutant loading rate for the pollutant in Table 2 of §503.13; or

(ii) The concentration of each pollutant in the sewage sludge shall not exceed the concentration for the pollutant in Table 3 of §503.13.

(3) If bulk sewage sludge is applied to a lawn or a home garden, the concentration of each pollutant in the sewage sludge shall not exceed the concentration for the pollutant in Table 3 of §503.13.

(4) If sewage sludge is sold or given away in a bag or other container for application to the land, either:

(i) The concentration of each pollutant in the sewage sludge shall not exceed the concentration for the pollutant in Table 3 of §503.13; or

(ii) The product of the concentration of each pollutant in the sewage sludge and the annual whole sludge application rate for the sewage sludge shall not cause the annual pollutant loading rate for the pollutant in Table 4 of §503.13 to be exceeded. The procedure used to determine the annual whole sludge application rate is presented in appendix A of this part.

(b) *Pollutant concentrations and loading rates—sewage sludge—(1) Ceiling concentrations.*

T 1 §503.13—C C

Pollutant	Ceiling concentration (milligrams per kilogram)¹
Arsenic	75
Cadmium	85
Copper	4300
Lead	840
Mercury	57
Molybdenum	75
Nickel	420
Selenium	100
Zinc	7500

¹Dry weight basis.

(2) *Cumulative pollutant loading rates.*

T 2 §503.13—C P L R

Pollutant	Cumulative pollutant loading rate (kilograms per hectare)
Arsenic	41

4/2020

Cadmium	39
Copper	1500
Lead	300
Mercury	17
Nickel	420
Selenium	100
Zinc	2800

7/2

(3) *Pollutant concentrations.*

T 3 §503.13—P C

Pollutant	Monthly average concentration (milligrams per kilogram) ¹
Arsenic	41
Cadmium	39
Copper	1500
Lead	300
Mercury	17
Nickel	420
Selenium	100
Zinc	2800

¹Dry weight basis.(4) *Annual pollutant loading rates.*

T 4 §503.13—A P L R

Pollutant	Annual pollutant loading rate (kilograms per hectare per 365 day period)
Arsenic	2.0
Cadmium	1.9
Copper	75
Lead	15
Mercury	0.85
Nickel	21
Selenium	5.0
Zinc	140

(c) *Domestic septage*. The annual application rate for domestic septage applied to agricultural land, forest, or a reclamation site shall not exceed the annual application rate calculated using equation (1).

$$AAR = \frac{N}{0.0026} \quad Eq. (1)$$

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Where:

AAR = Annual application rate in gallons per acre per 365 day period.



N = Amount of nitrogen in pounds per acre per 365 day period needed by the crop or vegetation grown on the land.

[58 FR 9387, Feb. 19, 1993, as amended at 58 FR 9099, Feb. 25, 1994; 60 FR 54769, Oct. 25, 1995]

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§503.14 Management practices.

(a) Bulk sewage sludge shall not be applied to the land if it is likely to adversely affect a threatened or endangered species listed under section 4 of the Endangered Species Act or its designated critical habitat.

(b) Bulk sewage sludge shall not be applied to agricultural land, forest, a public contact site, or a reclamation site that is flooded, frozen, or snow-covered so that the bulk sewage sludge enters a wetland or other waters of the United States, as defined in 40 CFR 122.2, except as provided in a permit issued pursuant to section 402 or 404 of the CWA.

(c) Bulk sewage sludge shall not be applied to agricultural land, forest, or a reclamation site that is 10 meters or less from waters of the United States, as defined in 40 CFR 122.2, unless otherwise specified by the permitting authority.

(d) Bulk sewage sludge shall be applied to agricultural land, forest, a public contact site, or a reclamation site at a whole sludge application rate that is equal to or less than the agronomic rate for the bulk sewage sludge, unless, in the case of a reclamation site, otherwise specified by the permitting authority.

(e) Either a label shall be affixed to the bag or other container in which sewage sludge that is sold or given away for application to the land, or an information sheet shall be provided to the person who receives sewage sludge sold or given away in an other container for application to the land. The label or information sheet shall contain the following information:

(1) The name and address of the person who prepared the sewage sludge that is sold or given away in a bag or other container for application to the land.

(2) A statement that application of the sewage sludge to the land is prohibited except in accordance with the instructions on the label or information sheet.

(3) The annual whole sludge application rate for the sewage sludge that does not cause any of the annual pollutant loading rates in Table 4 of §503.13 to be exceeded.

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§503.15 Operational standards—pathogens and vector attraction reduction.

(a) *Pathogens—sewage sludge.* (1) The Class A pathogen requirements in §503.32(a) or the Class B pathogen requirements and site restrictions in §503.32(b) shall be met when

bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site.

(2) The Class A pathogen requirements in §503.32(a) shall be met when bulk sewage sludge is applied to a lawn or a home garden.

(3) The Class A pathogen requirements in §503.32(a) shall be met when sewage sludge is sold or given away in a bag or other container for application to the land.

(b) *Pathogens—domestic septage*. The requirements in either §503.32 (c)(1) or (c)(2) shall be met when domestic septage is applied to agricultural land, forest, or a reclamation site.

(c) *Vector attraction reduction—sewage sludge*. (1) One of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(10) shall be met when bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site.

(2) One of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) shall be met when bulk sewage sludge is applied to a lawn or a home garden.

(3) One of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) shall be met when sewage sludge is sold or given away in a bag or other container for application to the land.

(d) *Vector attraction reduction—domestic septage*. The vector attraction reduction requirements in §503.33(b)(9), (b)(10), or (b)(12) shall be met when domestic septage is applied to agricultural land, forest, or a reclamation site.

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§503.16 Frequency of monitoring.

(a) *Sewage sludge*. (1) The frequency of monitoring for the pollutants listed in Table 1, Table 2, Table 3 and Table 4 of §503.13; the pathogen density requirements in §503.32(a) and §503.32(b)(2); and the vector attraction reduction requirements in §503.33 (b)(1) through (b)(4) and §503.33 (b)(7) through (b)(8) shall be the frequency in Table 1 of §503.16.

T 1 §503.16—F M —L

A

Amount of sewage sludge ¹ (metric tons per 365 day period)	Frequency
Greater than zero but less than 290	Once per year.
Equal to or greater than 290 but less than 1,500	Once per quarter (four times per year).
Equal to or greater than 1,500 but less than 15,000	Once per 60 days (six times per year).
Equal to or greater than 15,000	Once per month (12 times per year).

1Either the amount of bulk sewage sludge applied to the land or the amount of sewage sludge prepared for sale or give-away in a bag or other container for application to the land (dry weight basis).

(2) After the sewage sludge has been monitored for two years at the frequency in Table 1 of §503.16, the permitting authority may reduce the frequency of monitoring for pollutant concentrations and for the pathogen density requirements in §503.32(a)(5)(ii) and (a)(5)(iii).

(b) *Domestic septage*. If either the pathogen requirements in §503.32(c)(2) or the vector attraction reduction requirements in §503.33(b)(12) are met when domestic septage is applied to agricultural land, forest, or a reclamation site, each container of domestic septage applied to the land shall be monitored for compliance with those requirements.

(Approved by the Office of Management and Budget under control number 2040-0157)

[58 FR 9387, Feb. 19, 1993, as amended at 64 FR 42569, Aug. 4, 1999]

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§503.17 Recordkeeping.

(a) *Sewage sludge*. (1) The person who prepares the sewage sludge in §503.10(b)(1) or (e) shall develop the following information and shall retain the information for five years:

(i) The concentration of each pollutant listed in Table 3 of §503.13 in the sewage sludge.

(ii) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the Class A pathogen requirements in §503.32(a) and the vector attraction reduction requirement in [insert one of the vector attraction reduction requirements in §503.33(b)(1) through §503.33(b)(8)] was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(iii) A description of how the Class A pathogen requirements in §503.32(a) are met.

(iv) A description of how one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8) is met.

(2) The person who derives the material in §503.10 (c)(1) or (f) shall develop the following information and shall retain the information for five years:

(i) The concentration of each pollutant listed in Table 3 of §503.13 in the material.

(ii) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the Class A pathogen requirements in §503.32(a) and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8)) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and

evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

- (iii) A description of how the Class A pathogen requirements in §503.32(a) are met.
- (iv) A description of how one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) is met.

(3) If the pollutant concentrations in §503.13(b)(3), the Class A pathogen requirements in §503.32(a), and the vector attraction reduction requirements in either §503.33 (b)(9) or (b)(10) are met when bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site:

(i) The person who prepares the bulk sewage sludge shall develop the following information and shall retain the information for five years.

(A) The concentration of each pollutant listed in Table 3 of §503.13 in the bulk sewage sludge.

(B) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the Class A pathogen requirements in §503.32(a) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(C) A description of how the pathogen requirements in §503.32(a) are met.

(ii) The person who applies the bulk sewage sludge shall develop the following information and shall retain the information for five years.

(A) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the management practices in §503.14 and the vector attraction reduction requirement in (insert either §503.33(b)(9) or (b)(10)) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(B) A description of how the management practices in §503.14 are met for each site on which bulk sewage sludge is applied.

(C) A description of how the vector attraction reduction requirements in either §503.33(b)(9) or (b)(10) are met for each site on which bulk sewage sludge is applied.

(4) If the pollutant concentrations in §503.13(b)(3) and the Class B pathogen requirements in §503.32(b) are met when bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site:

(i) The person who prepares the bulk sewage sludge shall develop the following information and shall retain the information for five years:

(A) The concentration of each pollutant listed in Table 3 of §503.13 in the bulk sewage sludge.

(B) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the Class B pathogen requirements in §503.32(b) and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8) if one of those requirements is met) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(C) A description of how the Class B pathogen requirements in §503.32(b) are met.

(D) When one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) is met, a description of how the vector attraction reduction requirement is met.

(ii) The person who applies the bulk sewage sludge shall develop the following information and shall retain the information for five years.

(A) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the management practices in §503.14, the site restrictions in §503.32(b)(5), and the vector attraction reduction requirement in (insert either §503.33(b)(9) or (b)(10) if one of those requirements is met) was prepared for each site on which bulk sewage sludge is applied under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(B) A description of how the management practices in §503.14 are met for each site on which bulk sewage sludge is applied.

(C) A description of how the site restrictions in §503.32(b)(5) are met for each site on which bulk sewage sludge is applied.

(D) When the vector attraction reduction requirement in either §503.33 (b)(9) or (b)(10) is met, a description of how the vector attraction reduction requirement is met.

(E) The date bulk sewage sludge is applied to each site.

(5) If the requirements in §503.13(a)(2)(i) are met when bulk sewage sludge is applied to agricultural land, forest, a public contact site, or a reclamation site:

(i) The person who prepares the bulk sewage sludge shall develop the following information and shall retain the information for five years.

(A) The concentration of each pollutant listed in Table 1 of §503.13 in the bulk sewage sludge.

(B) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements in (insert either §503.32(a) or §503.32(b)) and the vector attraction reduction

requirement in (insert one of the vector attraction reduction requirements in §503.33(b)(1) through (b)(8) if one of those requirements is met) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(C) A description of how the pathogen requirements in either §503.32 (a) or (b) are met.

(D) When one of the vector attraction requirements in §503.33 (b)(1) through (b)(8) is met, a description of how the vector attraction requirement is met.

(ii) The person who applies the bulk sewage sludge shall develop the following information, retain the information in §503.17 (a)(5)(ii)(A) through (a)(5)(ii)(G) indefinitely, and retain the information in §503.17 (a)(5)(ii)(H) through (a)(5)(ii)(M) for five years.

(A) The location, by either street address or latitude and longitude, of each site on which bulk sewage sludge is applied.

(B) The number of hectares in each site on which bulk sewage sludge is applied.

(C) The date bulk sewage sludge is applied to each site.

(D) The cumulative amount of each pollutant (*i.e.*, kilograms) listed in Table 2 of §503.13 in the bulk sewage sludge applied to each site, including the amount in §503.12(e)(2)(iii).

(E) The amount of sewage sludge (*i.e.*, metric tons) applied to each site.

(F) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the requirement to obtain information in §503.12(e)(2) was prepared for each site on which bulk sewage sludge was applied under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(G) A description of how the requirements to obtain information in §503.12(e)(2) are met.

(H) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the management practices in §503.14 was prepared for each site on which bulk sewage sludge was applied under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(I) A description of how the management practices in §503.14 are met for each site on which bulk sewage sludge is applied.

(J) The following certification statement when the bulk sewage sludge meets the Class B pathogen requirements in §503.32(b):

I certify, under penalty of law, that the information that will be used to determine compliance with the site restrictions in §503.32(b)(5) for each site on which Class B sewage sludge was applied was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel

properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(K) A description of how the site restrictions in §503.32(b)(5) are met for each site on which Class B bulk sewage sludge is applied.

(L) The following certification statement when the vector attraction reduction requirement in either §503.33(b)(9) or (b)(10) is met:

I certify, under penalty of law, that the information that will be used to determine compliance with the vector attraction reduction requirement in (insert either §503.33(b)(9) or §503.33(b)(10)) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(M) If the vector attraction reduction requirements in either §503.33 (b)(9) or (b)(10) are met, a description of how the requirements are met.

(6) If the requirements in §503.13(a)(4)(ii) are met when sewage sludge is sold or given away in a bag or other container for application to the land, the person who prepares the sewage sludge that is sold or given away in a bag or other container shall develop the following information and shall retain the information for five years:

(i) The annual whole sludge application rate for the sewage sludge that does not cause the annual pollutant loading rates in Table 4 of §503.13 to be exceeded.

(ii) The concentration of each pollutant listed in Table 4 of §503.13 in the sewage sludge.

(iii) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the management practice in §503.14(e), the Class A pathogen requirement in §503.32(a), and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33(b)(1) through §503.33(b)(8)) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(iv) A description of how the Class A pathogen requirements in §503.32(a) are met.

(v) A description of how one of the vector attraction requirements in §503.33 (b)(1) through (b)(8) is met.

(b) *Domestic septage*. When domestic septage is applied to agricultural land, forest, or a reclamation site, the person who applies the domestic septage shall develop the following information and shall retain the information for five years:

(1) The location, by either street address or latitude and longitude, of each site on which domestic septage is applied.

(2) The number of acres in each site on which domestic septage is applied.

(3) The date domestic septage is applied to each site.

(4) The nitrogen requirement for the crop or vegetation grown on each site during a 365 day period.

(5) The rate, in gallons per acre per 365 day period, at which domestic septage is applied to each site.

(6) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements (insert either §503.32(c)(1) or §503.32(c)(2)) and the vector attraction reduction requirement in [insert §503.33(b)(9), 503.33(b)(10), or §503.33(b)(12)] was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(7) A description of how the pathogen requirements in either §503.32(c)(1) or (c)(2) are met.

(8) A description of how the vector attraction reduction requirements in §503.33 (b)(9), (b)(10), or (b)(12) are met.

(Approved by the Office of Management and Budget under control number 2040-0157)

[58 FR 9387, Feb. 19, 1993, as amended at 64 FR 42569, Aug. 4, 1999]

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§503.18 Reporting.

(a) Class I sludge management facilities, POTWs (as defined in §501.2 of this chapter) with a design flow rate equal to or greater than one million gallons per day, and POTWs that serve 10,000 people or more shall submit a report on February 19 of each year. As of December 21, 2016 all reports submitted in compliance with this section must be submitted electronically by the operator to EPA when the Regional Administrator is the Director in compliance with this section and 40 CFR part 3 (including, in all cases, subpart D to part 3), 40 CFR 122.22, and 40 CFR part 127. As of December 21, 2020 all reports submitted in compliance with this section must be submitted electronically in compliance with this section and 40 CFR part 3 (including, in all cases, subpart D to part 3), 40 CFR 122.22, and 40 CFR part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to the start dates for electronic reporting (see Table 1 in 40 CFR 127.16), the Director may also require operators to electronically submit annual reports under this section if required to do so by state law.

(1) The information in §503.17(a), except the information in §503.17 (a)(3)(ii), (a)(4)(ii) and in (a)(5)(ii), for the appropriate requirements on February 19 of each year.

(2) The information in §503.17(a)(5)(ii)(A) through (a)(5)(ii)(G) on February 19th of each year when 90 percent or more of any of the cumulative pollutant loading rates in Table 2 of §503.13 is reached at a land application site.

(Approved by the Office of Management and Budget under control number 2040-0157)



[58 FR 9387, Feb. 19, 1993, as amended at 64 FR 42570, Aug. 4, 1999; 80 FR 64157, Oct. 22, 2015]

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ORDER NO. R3-2017-0028
NPDES NO. CA0049964

WASTE DISCHARGE REQUIREMENTS
FOR THE SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY
SOUTH COUNTY REGIONAL WASTEWATER TREATMENT AND RECLAMATION FACILITY

The following Discharger is subject to waste discharge requirements as set forth in this Order:

Table 1. Discharger Information

Discharger	South County Regional Wastewater Authority
Name of Facility	South County Regional Wastewater Treatment and Reclamation Facility
Facility Address	1500 Southside Drive
	Gilroy CA 95020
	Santa Clara County

Table 2. Discharge Location

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Receiving Water
001	Treated Wastewater	36° 58' 50" N	121° 32' 00" W	Land Application to Percolation Ponds Adjacent to Llagas Creek
002	Disinfected Tertiary Recycled Domestic Wastewater	36° 58' 52" N	121° 30' 43" W	Pajaro River
003	Disinfected Tertiary Recycled Domestic Wastewater	--	--	Reclamation Use

Table 3. Administrative Information

This Order was adopted by the Central Coast Water Board on:	September 21, 2017
This Order shall become effective on:	December 1, 2017
This Order shall expire on:	November 30, 2022
The Discharger shall file a Report of Waste Discharge as an application for reissuance of waste discharge requirements in accordance with title 23, California Code of Regulations, and an application for reissuance of a National Pollutant Discharge Elimination System (NPDES) permit no later than:	March 25, 2022
The U.S. Environmental Protection Agency (USEPA) and the Central Coast Water Board have classified this discharge as follows:	Major

I, John M. Robertson, Executive Officer, do hereby certify that this order with all attachments is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Central Coast Region on the date indicated above.

for John M. Robertson, Executive Officer

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I. FACILITY INFORMATION

Information describing the South County Regional Wastewater Treatment and Reclamation Facility and collections systems (collectively the Facility) is summarized in Table 1 and in Fact Sheet (Attachment F) sections I and II.

II. FINDINGS

The California Regional Water Quality Control Board, Central Coast Region (hereinafter Central Coast Water Board) finds:

- A. **Legal Authorities.** This Order serves as waste discharge requirements (WDRs) pursuant to article 4, chapter 4, division 7 of the California Water Code (commencing with section 13260). This Order is also issued pursuant to section 402 of the federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA) and chapter 5.5, division 7 of the Water Code (commencing with section 13370). It shall serve as an NPDES permit for point source discharges from this facility to surface waters.
- B. **Background and Rationale for Requirements.** The Central Coast Water Board developed the requirements in this Order based on information submitted as part of the application, through monitoring and reporting programs, and other available information. The Fact Sheet (Attachment F), which contains background information and rationale for the requirements in this Order, is hereby incorporated into and constitutes findings for this Order. Attachments A through E are also incorporated into this Order.
- C. **Provisions and Requirements Implementing State Law.** The provisions and requirements in subsections III.B, III.C, IV.B, IV.C, and V.B are included to implement state law only. These provisions and requirements are not required or authorized under the federal CWA; consequently, violations of these provisions and requirements are not subject to the enforcement remedies that are available for NPDES violations.
- D. **Notification of Interested Parties.** The Central Coast Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe WDRs for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Details of the notification are provided in the Fact Sheet of this Order.
- E. **Consideration of Public Comment.** The Central Coast Water Board, in a public meeting, heard and considered all comments pertaining to the discharge. Details of the public hearing are provided in the Fact Sheet of this Order.

THEREFORE, IT IS HEREBY ORDERED that Order No. R3-2010-0009 is rescinded upon the effective date of this Order except for enforcement purposes and, in order to meet the provisions contained in division 7 of the Water Code (commencing with section 13000) and regulations adopted thereunder and the provisions of the CWA and regulations and guidelines adopted thereunder, the Discharger shall comply with the requirements in this Order.

III. DISCHARGE PROHIBITIONS

- A. Discharge of treated wastewater at a location or in a manner other than as described by this Order is prohibited.
- B. The discharge of any waste not specifically regulated by this Order is prohibited.
- C. Creation of a condition of pollution, contamination, or nuisance, as defined by Section 13050 of the CWC, is prohibited.

- D. The overflow or bypass of wastewater from the Discharger's collection, treatment, or disposal facilities and the subsequent discharge of untreated or partially treated wastewater, except as provided for in Attachment D, Standard Provisions I.G (Bypass), is prohibited.
- E. Discharge of sludge, residues, or any other wastes into surface waters or into any area where they may enter surface water is prohibited.
- F. The average daily flow in the three driest months of each year shall not exceed 8.5 million gallons per day (MGD). The average daily influent flow in the three wettest months of each year shall not exceed 10.8 MGD.
- G. The discharge of fecal coliform bacteria originating from human sources at Discharge Point No. 002 to the Pajaro River is prohibited.

IV. EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

A. Effluent Limitations – Discharge Point No. 002

The Discharger shall comply with the following effluent limitations at Discharge Point No. 002 with compliance measured at Monitoring Location EFF-002 as described in the attached MRP.

Table 4. Effluent Limitations

Parameter	Units	Effluent Limitations		
		Average Monthly	Average Weekly	Maximum Daily
Flow	MGD	---	---	9.0
Biochemical Oxygen Demand 5-day @ 20°C (BOD ₅)	mg/L	10	---	20
Total Suspended Solids (TSS)	mg/L	10	---	20
Nitrate (as N)	mg/L	5	---	10
Un-ionized Ammonia (as N)	mg/L	0.025	---	0.050
pH	standard units	7.0 – 8.3 at all times		
Total Dissolved Solids (TDS)	mg/L	1,000	---	---
Sodium	mg/L	200	---	---
Chloride	mg/L	250	---	---
Sulfate	mg/L	250	---	---
Boron	mg/L	1.0	---	---
Chlorine, Total Residual	mg/L	---	---	[1]
Copper, Total Recoverable	µg/L	20	---	42
Lead, Total Recoverable	µg/L	2.1	---	4.2
Chlorodibromomethane	µg/L	0.40	---	0.80
Dichlorobromomethane	µg/L	0.45	---	0.90
Trihalomethanes, Total	µg/L	80	---	160

[1] Chlorine concentrations shall at no time exceed detection levels as determined by amperometric titration or another equally sensitive method.

1. **Percent Removal:** The average monthly percent removal of BOD₅ and TSS shall not be less than 85 percent.
2. **Turbidity**

- b. Turbidity shall be less than 10 NTU at all times.
- c. Turbidity shall not exceed 5 NTU for more than 5 percent off the time.

3. Total Coliform Bacteria

- a. The 7-day median concentration shall be less than 2.2 organisms/100 mL.
- b. Coliform concentrations shall not exceed 23 organisms/100 mL in more than one sample in any 30-day period.
- c. Coliform concentrations shall be less than 240 organisms/100 mL at all times.

B. Land Discharge Specifications

4. The Discharger shall comply with the following specifications at Discharge Point No. 001 for the land application of treated secondary effluent to percolation ponds, with compliance measured at Monitoring Location EFF-001, as described in the attached MRP.

Table 5. Effluent Limitations

Parameter	Units	Effluent Limitations			
		Average Monthly	Average Weekly	Maximum Daily	12-Month Moving Avg.
BOD ₅	mg/L	30	45	---	---
TSS	mg/L	30	45	---	---
Nitrate (as N)	mg/L	5	---	10	---
TDS	mg/L	---	---	---	900
Sodium	mg/L	---	---	---	175
Chloride	mg/L	---	---	---	200
Sulfate	mg/L	---	---	---	150
Boron	mg/L	---	---	---	1.0
pH	mg/L	6.5 – 8.3 at all times			

5. Specifications for Discharges of Secondary Treated Wastewater to the Percolation Ponds at Discharge Point No. 001.
- a. Freeboard shall always exceed two feet in all percolation ponds.
- b. Extraneous surface drainage shall be excluded from all percolation ponds.
- c. Irrigation beds and designated percolation ponds shall be disked or plowed at least annually.
- d. Wastewater shall be confined to land owned or controlled by the Discharger.
- e. Wastewater shall be confined within bermed areas.
- f. Wastewater application rates to the percolation ponds shall be consistent with accepted engineering practice.
- g. Percolation ponds shall be dried to field moisture conditions between applications during dry-weather months. Pond volumes may be optimized in wet-weather months.

- h. A pathway shall be maintained along the dike between the designated percolation areas and Llagas Creek to allow for inspections.
- SOUTH COUNTY REGIONAL WASTEWATER TREATMENT AND RECLAMATION FACILITY
- ORDER NO. R3-2017-0028
NPDES NO. CA0049964
- i. The wastewater treatment facility, including the percolation ponds, shall be managed to minimize mosquito breeding habitat.

C. Recycling Specifications – Discharge Point No. 003

1. Reclamation use of tertiary treated wastewater shall adhere to applicable requirements of CWC sections 13500-13577 (Water Reclamation); California Code of Regulations title 17, sections 7583-7586; title 17 sections 7601-7605; and title 22, sections 60301-60355 (Uniform Statewide Recycling Criteria). Production, distribution and use of recycled water is currently regulated separately under Master Water Reclamation Requirements Order No. 98-052. Specifications related to recycled water production are also included here.
2. Recycled water production shall comply with a title 22 engineering report approved by the Division of Drinking Water that demonstrates or defines compliance with the Uniform Statewide Recycling Criteria (and amendments).
3. Recycled water shall be disinfected tertiary recycled water, as defined by title 22, section 60301.230.
4. Recycled water shall be adequately oxidized, filtered, and disinfected, as defined in title 22.
5. The Discharger shall comply with the following specifications at Discharge Point No. 003 for reclamation of tertiary treated secondary wastewater, with compliance measured at Monitoring Location EFF-003, as described in the attached MRP.

Table 6. Disinfected Tertiary Recycled Water Limitations

Parameter	Units	Effluent Limitations	
		Average Monthly	Maximum Daily
BOD ₅	mg/L	10	20
TSS	mg/L	10	20
Nitrate (as N)	mg/L	5	10

6. Recycled water shall not exceed any of the following turbidity limits:
 - a. An average of 2 NTU within a 24-hour period,
 - b. 5 NTU more than 5 percent of the time within a 24-hour period, and
 - c. 10 NTU at any time.
7. The median concentration of total coliform bacteria measured in the disinfected recycled water shall not exceed the following limits:
 - a. An MPN of 2.2 per 100 mL utilizing the bacteriological results of the last seven days for which analyses have been completed,
 - b. An MPN of 23 per 100 mL in more than one sample in any 30 day period, and
 - c. No sample shall exceed an MPN of 240 total coliform bacteria per 100 mL.
8. Freeboard shall always exceed two feet in all recycled water storage ponds.

are not being met. The delivery of recycled water shall not be resumed until all conditions that caused the limits to be violated have been corrected.

10. Recycled water shall not exceed any maximum contaminant level established pursuant to sections 116275(c)(1) and (d) of the California Health and Safety Code or established by the U.S. Environmental Protection Agency.
11. Recycled water disinfected with chlorine shall have a CT value (chlorine concentration time modal contact time) of not less than 450 mg-min/L at all times with a modal contact time of at least 90 minutes based on a flow of 9.0 MGD. Monthly average flow of chlorinated recycled water shall not exceed 15 MGD or the total monthly demand of the users.
12. Recycled water disinfected with ultraviolet (UV) light shall comply with the following DDW recommendations:
 - a. Each UV channel must be operated independently to deliver a minimum UV dose of 110 mJ/cm² at all times.
 - b. The equations below must be used for each UV reactor as part of the automatic UV disinfection control system for calculating UV dose. They are from the "Wedeco Open Channel TAK55 Wastewater UV Reactor 360W Validation Report Final," Carollo Engineers, dated January 2010.

$$S_o = e^{-0.63} \times e^{0.0452 \times UVT} \times Power^{0.9124}$$

$$RED_{calc} = CR \times 10^{1.863} \times UVA^{-1.695} \times [S/S_o]^{0.927} \times Q^{-0.839}$$

Where: UVT = UV transmittance at 254 nm, expressed as a whole number, e.g., 60 to 72 S

= Measured UV sensor value (mW/cm²)

S_o = calculated intensity from new lamp at full power (at same UVT) with clean sleeves, typically expressed as a function of UVT (mW/cm²)

ED_{calc} = UV dose calculated per bank (mJ/cm²)

CR = Confidence factor = 0.938

UVA = UV absorbance at 254 nm (cm⁻¹), e.g., between 0.222 and 0.142¹.

Q = Flow rate, calculated as gpm divided by the number of lamps in one bank (gpm/lamp)

Power = Measured ballast power setting (kW)

- c. The UV disinfection system is limited to the following operational parameter ranges:
 - i. Total plant flow is limited to 8 MGD (4.0 MGD per UV channel). Flow may be increased to 9 MGD total in accordance with DDW recommendations and Executive Officer approval.
 - ii. UVTs at or above 60 percent.
 - iii. UV sensor intensities ranging from 2.0 to 4.3 mW/cm².
- d. Online monitoring of UV intensity, flow, and UVT must be provided at all times.

¹ At UVT values above 72 percent, the value (72 UVT or UVA=0.142) should be used as the default value in the S_o and RED calculations respectively.

- e. Flow meters, UV intensity sensors, and UVT monitors must be properly calibrated to ensure proper disinfection.
- f. At least monthly, all duty UV intensity sensors must be checked for calibration against a reference UV intensity sensor.
- g. For all UV intensity sensors in use, the ratio of the duty UV sensor intensity to the reference UV sensor intensity must be less than or equal to 1.2. If the calibration ratio is >1.2 , the failed duty UV sensor must be replaced by a properly calibrated sensor and recalibrated by a qualified facility. The reference UV intensity sensors shall be recalibrated at least annually by a qualified facility using a National Institute of Standards and Technology (NIST) traceable standard.
- h. UVT meter must be inspected and checked against a reference bench-top unit weekly to document accuracy.
- i. If the on-line analyzer UVT reading varies from the bench-top spectrophotometer UVT reading by 2% or more, the on-line UVT analyzer must be recalibrated by a procedure recommended by the manufacturer.
- j. Flow meters measuring the flow through a UV reactor must be verified to determine accuracy at least monthly via checking the flow reading against other flow determination methods.
- k. Each UV reactor at the UV system must be designed with built-in automatic reliability features that must be triggered by critical alarm setpoints.
- l. Conditions triggering an alarm and startup the redundant bank include the following:
 - i. the UV dose goes below 115 mJ/cm^2 , and
 - ii. whole bank failure.
- m. Conditions that require diverting effluent to waste include the following:
 - i. UV dose is below the minimum UV dose of 110 mJ/cm^2 ,
 - ii. UVT is below the minimum UVT commissioned of 60%,
 - iii. UV intensity below the minimum validated of 2.0 mW/cm^2 ,
 - iv. complete UV channel failure, and
 - v. flow above the maximum flow commissioned of 4.0 MGD per channel.
- n. The UV system must be operated in accordance with an approved operations plan that specifies clearly the operational limits and responses required for critical alarms. The operations plan must be submitted to and approved by DDW prior to issuance of the operating permit. A copy of the approved operations plan must be maintained at the treatment plant and be readily available to operations personnel and regulatory agencies. A quick reference plant operations data sheet must be posted at the treatment plant and include the following information:
 - i. The alarm set points for flow, UV dose, UV intensity, and UVT.
 - ii. The values of flow, UV dose, UV intensity, and UVT when effluent must be diverted to waste.
 - iii. The required frequency of verification and calibration for all meters/analyzers measuring flow, UV intensity, and UV transmittance.
 - iv. The required frequency of mechanical cleaning and equipment inspection.
 - v. The UV lamp hour tracking procedures and replacement intervals.

of the 72 lamps in a bank, the two lamps with the highest number of hours must be the ones closest to the UV intensity sensor.

- p. Equivalent or substitutions of equipment are not acceptable without an adequate demonstration of equivalent disinfection performance.

V. RECEIVING WATER LIMITATIONS

A. Surface Water Limitation

Receiving water limitations are based on water quality objectives contained in the Basin Plan and are a required part of this Order. The discharge from the wastewater treatment facility shall not cause the following in the receiving waters:

1. Waters shall be free of coloration that causes nuisance or adversely affects beneficial uses. Coloration attributable to materials of waste origin shall not be greater than 15 units or 10 percent above natural background color, whichever is greater.
2. Waters shall not contain taste- or odor-producing substances in concentrations that impart undesirable tastes or odors to fish flesh or other edible products of aquatic origin, that cause nuisance, or that adversely affect beneficial uses.
3. Waters shall not contain floating material, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses.
4. Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.
5. Waters shall not contain settleable material in concentrations that result in deposition of material that causes nuisance or adversely affects beneficial uses.
6. Waters shall not contain oils, greases, waxes, or other similar materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses.
7. Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.
8. The suspended sediment load and suspended sediment discharge rate to surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.
9. Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increase in turbidity attributable to controllable water quality factors shall not exceed the following limits.
 - a. Where natural turbidity is between 0 and 50 Jackson Turbidity Units (JTU), increases shall not exceed 20 percent.
 - b. Where natural turbidity is between 50 and 100 JTU, increases shall not exceed 10 JTU.
 - c. Where natural turbidity is greater than 100 JTU, increases shall not exceed 10 percent.

10. The pH value shall not be depressed below 7.0 nor raised above 8.3. The change in normal ambient pH levels shall not exceed 0.5 in fresh water.

Local Limits Data Summary

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
05/01/17	8.337	7.368	0.853	0.01					
05/02/17	8.24	7.13	1.244	0.006					
05/03/17	8.216	7.027	1.355	0.008					
05/04/17	8.16	7.769	1.149	0.007					
05/05/17	7.927	7.268	1.456	0.004					
05/06/17	8.065	5.53	1.315	0					
05/07/17	8.025	7.175	0.51	0					
05/08/17	7.876	7.642	0	0.007					
05/09/17	7.876	6.645	1.189	0.007					
05/10/17	5.884	4.425	1.568	0.005					
05/11/17	7.632	6.764	0.935	0.007					
05/12/17	7.559	6.684	0.737	0.003					
05/13/17	7.778	6.486	0.766	0					
05/14/17	7.634	6.692	0.461	0					
05/15/17	7.535	6.601	0.613	0.014					
05/16/17	7.489	5.243	1.23	0.004					
05/17/17	7.384	6.106	1.018	0.007					
05/18/17	7.378	5.996	1.154	0.002					
05/19/17	7.269	5.896	1.451	0.011					
05/20/17	7.365	5.545	1.891	0					
05/21/17	7.308	5.537	1.76	0					
05/22/17	7.253	5.298	1.944	0.006					
05/23/17	7.152	5.058	2.13	0.013					
05/24/17	6.951	5.502	1.724	0.006					
05/25/17	6.908	5.511	1.692	0.007					
05/26/17	6.962	5.352	1.837	0.01					
05/27/17	6.875	5.236	1.756	0					
05/28/17	6.819	5.698	1.299	0					
05/29/17	7.137	6.128	1.153	0					
05/30/17	7.043	5.846	1.343	0.01					
05/31/17	6.918	5.907		0.004					
06/01/17	6.883	5.52	1.461	0.01					
06/02/17	6.815	5.95	1.067	0.007					
06/03/17	6.876	5.626	1.457	0					
06/04/17	6.874	5.663	1.348	0					

Appendix C: Local Limits Data Summary

06/05/17	6.822	4.915	1.968	0.012	345	2.2	302	2.4	<0.1

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
06/06/17	6.749	5.227	1.762	0.01					
06/07/17	6.818	5.38	1.592	0.002					
06/08/17	6.676	5.912	0.975	0.006					
06/09/17	6.669	5.169	1.583	0.01					
06/10/17	6.748	5.875	0.77	0					
06/11/17	6.634	5.184	1.278	0					
06/12/17	6.579	5.162	1.408	0					
06/13/17	6.607	4.825	1.938	0	331	2.9	272	2.6	
06/14/17	6.54	5.125	1.628	0					
06/15/17	6.533	5.097	1.648	0.001					
06/16/17	6.621	4.65	2.171	0					
06/17/17	6.508	4.088	2.782	0					
06/18/17	6.415	4.312	2.18	0					
06/19/17	6.595	4.12	2.638	0					
06/20/17	6.621	3.574	2.882	0.018					
06/21/17	6.606	4.255	2.559	0.03	309	<2	254	1.6	
06/22/17	6.595	4.228	2.645	0.026					
06/23/17	6.577	3.458	2.98	0.033					
06/24/17	6.538	3.957	2.502	0.021					
06/25/17	6.449	4.166	2.175	0.021					
06/26/17	6.493	4.343	2.494	0.026					
06/27/17	6.532	4.378	1.989	0.025					
06/28/17	6.41	4.55	2.043	0.03					
06/29/17	6.356	4.105	2.373	0.033	326	2.1	304	2	
06/30/17	6.497	4.346	2.375	0.029					
07/01/17	6.308	3.504	2.716	0.021					
07/02/17	6.117	3.763	2.095	0.021					
07/03/17	6.345	4.438	2.122	0.026					
07/04/17	6.255	4.98	1.473	0.022					
07/05/17	6.308	4.688	1.745	0.025					
07/06/17	6.347	3.99	2.464	0.026					
07/07/17	6.347	5.199	2.568	0.032	339	<2	294	1.8	ND
07/08/17	6.198	3.802	2.717	0.022					
07/09/17	6.29	3.394	1.958	0.021					
07/10/17	6.306	4.938	1.762	0.028					

Appendix C: Local Limits Data Summary

07/11/17	6.236	5.042	1.808	0.026					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
07/12/17	6.302	5.165	2.209	0.02					
07/13/17	6.242	4.343	2.541	0.021					
07/14/17	6.222	4.571	2.686	0.026					
07/15/17	6.174	4.931	1.972	0.017	318	2.4	238	1.8	
07/16/17	6.12	4.23	1.944	0.017					
07/17/17	6.306	4.849	1.906	0.02					<0.1
07/18/17	6.2	4.805	2.269	0.025					
07/19/17	6.241	4.522	2.183	0.019					
07/20/17	6.196	4.135	3.355	0.023					
07/21/17	6.209	4.817	1.705	0.024					
07/22/17	6.209	4.547	2.351	0.017					
07/23/17	6.202	5.036	1.366	0.017	337	3.9	292	4.8	
07/24/17	6.145	4.714	2.343	0.019					
07/25/17	6.218	4.816	1.914	0.019					
07/26/17	6.119	4.768	2.068	0.022					
07/27/17	6.184	4.129	2.543	0.02					
07/28/17	6.275	3.49	3.238	0.021					
07/29/17	6.173	3.299	2.768	0.016					
07/30/17	6.162	4.602	1.39	0.017					
07/31/17	6.244	4.622	2.013	0.017	421	2.9	309	2.8	
08/01/17	6.196	4.577	2.251	0.024					
08/02/17	6.164	4.049	2.426	0.022					
08/03/17	6.223	4.375	2.424	0.018					
08/04/17	6.207	4.717	2.999	0.023					
08/05/17	6.189	5.085	1.365	0.016					
08/06/17	6.199	5.51	1.221	0.016					
08/07/17	6.228	4.785	2.383	0.021					
08/08/17	6.226	5.455	2.572	0.025	342	<2	258	3.3	<0.1
08/09/17	6.346	5.169	2.473	0.024					
08/10/17	6.394	4.278	2.567	0.024					
08/11/17	6.14	3.944	2.878	0.018					
08/12/17	6.088	4.237	2.272	0.018					
08/13/17	6.178	4.929	2.099	0.016					
08/14/17	6.203	4.776	2.383	0.02					
08/15/17	6.247	4.657	2.36	0.024					

Appendix C: Local Limits Data Summary

08/16/17	6.316	5.45	1.739	0.024	339	<2	313	1.7	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
08/17/17	6.32	5.351	1.537	0.021					
08/18/17	6.244	4.487	2.116	0.025					
08/19/17	6.285	5.111	2.122	0.016					
08/20/17	6.385	5.905	1.371	0.016					
08/21/17	6.254	7.155	0.141	0.017					
08/22/17	6.233	5.433	1.428	0.025					
08/23/17	6.221	4.863	1.86	0.026					
08/24/17	6.084	5.411	2.505	0.023	324	<2	310	1.2	
08/25/17	6.106	4.501	2.454	0.029					
08/26/17	6.137	4.362	2.279	0.017					
08/27/17	6.208	4.859	1.784	0.015					
08/28/17	6.158	5.175	2.194	0.017					
08/29/17	6.199	4.54	2.187	0.026					
08/30/17	6.179	4.077	3.064	0.022					
08/31/17	6.304	4.498	3.478	0.026					
09/01/17	6.078	4.345	3.063	0.023	320	2.4	244	3	ND
09/02/17	5.921	4.034	2.94	0.015					
09/03/17	5.862	3.216	2.177	0.016					
09/04/17	6.414	4.897	1.734	0.015					
09/05/17	6.26	5.207	1.935	0.023					
09/06/17	6.23	5.31	1.68	0.018					
09/07/17	6.073	5.797	1.523	0.027					
09/08/17	5.962	5.016	1.82	0.03					
09/09/17	6.075	5.06	1.463	0.015	328	<2	286	1.8	
09/10/17	6.172	6.01	1.075	0.016					
09/11/17	5.997	5.911	1.252	0.019					
09/12/17	5.984	6.15	0.977	0.024					
09/13/17	6.043	5.594	1.005	0.021					
09/14/17	6.035	4.512	2.257	0.02					
09/15/17	6	4.408	2.08	0.032					
09/16/17	6.093	5.146	1.352	0.016					
09/17/17	6.124	6.083	0.779	0.015					
09/18/17	6.109	5.515	0.734	0.022	308	<2	281	1.7	
09/19/17	6.033	5.579	1.144	0.02					
09/20/17	6.001	5.052	1.186	0.023					

Appendix C: Local Limits Data Summary

09/21/17	5.981	4.879	1.78	0.028					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
09/22/17	5.943	5.677	1.25	0.023					
09/23/17	5.993	5.38	1.125	0.01					
09/24/17	6.103	5.793	1.061	0.016					
09/25/17	6.009	5.987	1.245	0.02	336	<2	278	1.4	
09/26/17	5.894	5.959	1.819	0.023					
09/27/17	5.916	5.601	1.656	0.028					
09/28/17	5.933	4.165	2.361	0.023					
09/29/17	5.91	4.685	2.042	0.022					
09/30/17	6.055	5.988	0.984	0.015					
10/01/17	6.581	5.656	0.889	0.015					
10/02/17	5.996	5.719	1.067	0.023					
10/03/17	5.641	5.625	1.239	0.023	322	2.5	278	2.5	ND
10/04/17	5.902	4.975	1.654	0.031					
10/05/17	5.865	4.423	1.299	0.026					
10/06/17	5.875	5.323	1.627	0.025					
10/07/17	5.95	5.174	1.382	0.015					
10/08/17	6.073	5.583	0.82	0.013					
10/09/17	6.023	5.618	1.287	0.02	350	<2			
10/10/17	5.884	3.205	1.62	0.029					
10/11/17	5.893	4.486	1.492	0.022	307	<2	254	2.8	
10/12/17	6.024	4.516	1.167	0.027					
10/13/17	5.972	4.698	0.818	0.025					
10/14/17	6.043	5.3	1.152	0.014					
10/15/17	6.082	5.142	1.032	0.015					
10/16/17	5.947	6.065	1.034	0.023					
10/17/17	5.936	5.251	1.324	0.022					
10/18/17	5.878	4.386	1.376	0.02					
10/19/17	5.81	4.664	1.594	0.022	326	2.4	346	3	
10/20/17	5.94	4.255	0.623	0.021					
10/21/17	5.934	5.099	0.376	0.012					
10/22/17	5.997	5.34	0.365	0.013					
10/23/17	5.95	4.959	1.174	0.02					
10/24/17	5.889	3.693	1.255	0.018					
10/25/17	5.847	4.183	1.792	0.023					
10/26/17	5.88	4.571	1.365	0.024					

Appendix C: Local Limits Data Summary

10/27/17	5.857	4.798	0.943	0.021	321	3.6	293	1.6	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
10/28/17	6.016	4.412	0.832	0.012					
10/29/17	6.084	4.112	0.946	0.013					
10/30/17	5.896	4.256	0.795	0.023					
10/31/17	5.755	4.378		0.023					
11/01/17	5.876	3.752	1.013	0.022					
11/02/17	5.897	4.284	1.005	0.022					
11/03/17	5.871	4.029	0.611	0.014					
11/04/17	6.022	4.423	0.397	0.014	332	<2	294	2.7	<0.1
11/05/17	6.071	3.602	0.313	0.014					
11/06/17	6.281	3.414	0.788	0.02					
11/07/17	5.88	3.407	0.961	0.022					
11/08/17	5.89	3.879	1.181	0.025					
11/09/17	6.183	5.297	0.389	0.013					
11/10/17	6.056	4.659	0.676	0.017					
11/11/17	5.925	5.235	0.195	0.012					
11/12/17	5.984	4.162	0.248	0.014	366	<2	333	1.8	
11/13/17	5.931	4.144	0.674	0.025					
11/14/17	5.927	4.943	0.462	0.02					
11/15/17	5.918	4.654	0.702	0.021					
11/16/17	6.859	5.681	0.314	0.019					
11/17/17	6.201	4.292	0.288	0.024					
11/18/17	6.134	3.874	0.269	0.012					
11/19/17	6.031	4.267	0.259	0.012					
11/20/17	6.033	5.09	0.243	0.018	363	<2	290	3	
11/21/17	6.105	5.35	0.274	0.026					
11/22/17	6.235	5.408	0.255	0.02					
11/23/17	6.277	5.922	0.238	0.012					
11/24/17	5.776	5.622	0.229	0.014					
11/25/17	5.981	5.555	0.254	0.012					
11/26/17	6.216	5.3	0.273	0.012					
11/27/17	6.202	3.866	0.256	0.017					
11/28/17	5.959	3.376	0.223	0.019	295	<2	266	2.2	
11/29/17	5.961	6.014	0.463	0.014					
11/30/17	6.158	5.831	0.053	0.02					
12/01/17	5.995	4.046	0.021	0.02					

Appendix C: Local Limits Data Summary

12/02/17	6.033	4.239	0.553	0.011					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
12/03/17	6.207	3.636	0.226	0.01					
12/04/17	5.972	8.964	0.239	0.019					
12/05/17	5.924	11.137	0.61	0.019	382		281		
12/06/17	6.004	5.235	0.313	0.018					
12/07/17	5.878	5.614	0.299	0.022					
12/08/17	5.73	5.266	0.111	0.02					
12/09/17	5.993	5.683	0.299	0.011					
12/10/17	6.07	5.499	0.243	0.01					
12/11/17	5.907	6.044	0	0.026					
12/12/17	5.835	5.626	0	0.02					
12/13/17	5.811	6.435	0.475	0.02	344		334		
12/14/17	5.903	5.739	0.587	0.02					
12/15/17	5.898	4.621	0.013	0.017					
12/16/17	6.078	5.031	0.368	0.012					
12/17/17	6.06	5.166	0.255	0.011					
12/18/17	5.966	5.157	0.213	0.026					
12/19/17	5.981	4.798	0.451	0.023	324		279		
12/20/17	5.963	5.128	0.235	0.017					
12/21/17	6.034	5.173	0.223	0.017					
12/22/17	6.129	5.283	0.23	0.019					
12/23/17	6.135	5.185	0.227	0.012					
12/24/17	6.2	5.403	0.198	0.012					
12/25/17	5.559	4.825	0.201	0.011					
12/26/17	6.036	4.818	0.335	0.019	395		324		
12/27/17	6.03	4.985	0.312	0.018					
12/28/17	5.99	5.474	0.265	0.024					
12/29/17	6.038	4.87	0.307	0.021					
12/30/17	5.992	5.017	0.369	0.012					
12/31/17	6.044	5.039	0.375	0.012					
01/01/18	5.587	4.729	0.263	0.012					
01/02/18	5.847	4.969	0.241	0.022					
01/03/18	5.963	5.871	0	0.02	389		286		<0.1
01/04/18	6.043	4.997	0.435	0.019					
01/05/18	5.81	1.322	0.073	0.017					
01/06/18	5.896	4.937	0	0.013					

Appendix C: Local Limits Data Summary

01/07/18	6.017	4.768	0.551	0.012					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
01/08/18	6.639	5.926	0.054	0.02					
01/09/18	7.738	6.876	0.085	0.018	314		294		
01/10/18	6.382	5.645	0	0.018					
01/11/18	6.133	5.164	0.273	0.021					
01/12/18	6.086	5.217	0.207	0.018					
01/13/18	6.117	5.369	0	0.012					
01/14/18	5.937	4.858	0.394	0.012					
01/15/18	6.375	5.323	0.22	0.019					
01/16/18	6	5.29	0	0.023	341		318		
01/17/18	5.908	5.157	0	0.015					
01/18/18	5.934	4.977	0	0.014					
01/19/18	5.942	4.842	0.621	0.015					
01/20/18	6.103	5.092	0.372	0.012					
01/21/18	6.092	5.415	0	0.013					
01/22/18	5.956	5.196	0.148	0.019					
01/23/18	6.013	5.328	0	0.016	322		306		
01/24/18	5.998	5.411	0.093	0.021					
01/25/18	6.005	5.338	0.029	0.02					
01/26/18	6.06	4.601	0.891	0.018					
01/27/18	6.188	5.481	0	0.012					
01/28/18	6.231	5.348	0.129	0.012					
01/29/18	6.096	5.418	0	0.018					
01/30/18	6.024	4.921	0.466	0.024	363		311		
01/31/18	6.046	5.367	0.01	0.027					
02/01/18	6.075	5.421	0	0.023					
02/02/18	5.971	5.148	0.27	0.017					
02/03/18	6.06	4.387	0.646	0.011					
02/04/18	6.151	4.894	0.018	0.01					
02/05/18	5.96	5.348	0	0.014					
02/06/18	5.948	5.046	0.324	0.021	322	<2	310	1.4	ND
02/07/18	6.031	4.922	0.508	0.024					
02/08/18	5.959	5.734	0.09	0.014					
02/09/18	5.929	4.206	0.416	0.018					
02/10/18	6.119	5.431	0	0.011					
02/11/18	6.175	5.458	0	0.012					

Appendix C: Local Limits Data Summary

02/12/18	6.023	4.721	0.68	0.016					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
02/13/18	5.964	4.678	0.694	0.016	355	2.4	302	2.6	
02/14/18	5.88	4.633	0.638	0.015					
02/15/18	5.862	4.792	0.133	0.021					
02/16/18	5.848	4.674	0.636	0.015					
02/17/18	5.872	4.94	0.468	0.01					
02/18/18	5.683	4.791	0.378	0.008					
02/19/18	5.974	4.976	0.38	0.011					
02/20/18	5.757	4.815	0.539	0.029	354	2.5	276	2	
02/21/18	5.78	4.367	1.009	0.019					
02/22/18	5.822	3.602	1.034	0.016					
02/23/18	5.807	4.649	0.662	0.019					
02/24/18	5.815	5.15	0.157	0.01					
02/25/18	6.016	5.133	0.337	0.008					
02/26/18	6.051	5.16	0.072	0.012					
02/27/18	5.952	4.255	0.46	0.02	311	<2	317	1.4	
02/28/18	5.895	5.124	0.179	0.014					
03/01/18	7.723	7.811	0.076	0.017					
03/02/18	6.676	5.732	0.076	0.01					
03/03/18	6.909	5.638	0.149	0.009					
03/04/18	6.611	5.582	0.073	0.009					
03/05/18	6.374	5.464	0.134	0.024					
03/06/18	6.299	5.309	0.321	0.029	373	<2	282	2.1	<0.1
03/07/18	6.389	4.786	0.175	0.006					
03/08/18	6.234	5.291	0.193	0.033					
03/09/18	6.18	5.686	0.369	0.018					
03/10/18	6.214	5.271	0.365	0.009					
03/11/18	6.468	5.15	1.13	0.01					
03/12/18	6.306	5.615	0.54	0.023					
03/13/18	6.359	5.465	0.25	0.026	369	<2	390	1.2	
03/14/18	6.122	4.561	0.214	0.016					
03/15/18	6.298	4.886	0.102	0.025					
03/16/18	7.174	5.311	0.068	0.016					
03/17/18	6.669	5.574	0.147	0.01					
03/18/18	6.558	5.609	0.072	0.011					
03/19/18	6.502	5.48	0.212	0.019					

Appendix C: Local Limits Data Summary

03/20/18	6.518	6.234	0.163	0.027	336	<2	300	1.6	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
03/21/18	6.885	5.707	0.252	0.017					
03/22/18	8.581	7.503	0	0.02					
03/23/18	7.234	6.138	0.126	0.022					
03/24/18	7.071	6.203	0.073	0.01					
03/25/18	6.993	5.862	0.257	0.01					
03/26/18	6.875	6.357	0.157	0.02					
03/27/18	6.805	6.908	0	0.026	326	<2	260	2.2	
03/28/18	6.742	5.874	0	0.017					
03/29/18	6.727	5.363	0.679	0.016					
03/30/18	6.768	5.572	0.471	0.031					
03/31/18	6.706	5.737	0.215	0.009					
04/01/18	6.43	5.535	1.12	0.011					
04/02/18	6.454	4.956	1.766	0.018					
04/03/18	6.429	5.193	1.541	0.024	326	<2	260	1.6	<0.1
04/04/18	6.357	4.992	1.68	0.013					
04/05/18	6.292	4.511	1.349	0.019					
04/06/18	6.493	5.598	1.326	0.03					
04/07/18	6.942	6.041	1.111	0.01					
04/08/18	6.653	5.615	1.23	0.01					
04/09/18	6.674	5.468	1.466	0.022					
04/10/18	6.64	5.6	1.276	0.025	301	<2	238	1.7	
04/11/18	6.586	4.638	1.062	0.021					
04/12/18	6.672	5.287	0.55	0.024					
04/13/18	6.454	5.527	0.243	0.024					
04/14/18	6.476	5.368	0.415	0.01					
04/15/18	6.624	5.742	0.096	0.01					
04/16/18	6.613	5.477	0.435	0.021					
04/17/18	6.519	5.507	0.259	0.024	340	2	290	2.7	
04/18/18	6.608	5.341	0.567	0.018					
04/19/18	6.534	5.078	0.796	0.027					
04/20/18	6.566	5.019	0.921	0.02					
04/21/18	6.46	4.944	0.853	0.012					
04/22/18	6.581	5.243	0.643	0.01					
04/23/18	6.668	4.851	1.229	0.018					
04/24/18	6.411	4.546	1.547	0.028	328	2.5	272	2.3	

Appendix C: Local Limits Data Summary

04/25/18	6.412	4.149	1.093	0.021					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
04/26/18	6.343	4.836	1.095	0.019					
04/27/18	6.361	5.291	0.767	0.025					
04/28/18	6.289	4.744	1.209	0.012					
04/29/18	6.38	4.915	0.785	0.011					
04/30/18	6.336	4.801	0.64	0.02					
05/01/18	6.304	4.691	0.769	0.026	320	3	274	2.6	
05/02/18	6.272	4.794	1.362	0.021					
05/03/18	6.238	4.94	1.352	0.023					
05/04/18	6.293	4.668	1.108	0.021					
05/05/18	6.275	4.148	1.556	0.011					
05/06/18	6.269	4.663	1.061	0.01					
05/07/18	6.3	3.581	1.948	0.022					
05/08/18	6.178	4.267	1.615	0.015	330	4.2	345	2.5	
05/09/18	6.127	4.509	1.146	0.024					
05/10/18	6.168	4.102	1.167	0.026					
05/11/18	6.206	2.955	2.1	0.023					
05/12/18	6.226	4.165	1.488	0.012					
05/13/18	6.215	4.09	1.271	0.012					
05/14/18	7.082	4.604	1.09	0.024					
05/15/18	6.215	4.558	0.997	0.027	338	2.2	322	1.9	
05/16/18	6.238	4.154	1.476	0.015					
05/17/18	6.173	3.978	1.65	0.03					
05/18/18	6.159	4.442	1.246	0.024					
05/19/18	6.172	4.397	1.63	0.011					
05/20/18	6.166	4.482	1.107	0.011					
05/21/18	6.174	3.417	1.749	0.025					
05/22/18	6.129	5.045	1.3	0.026	336	2	304	2	
05/23/18	6.152	4.218	1.235	0.02					
05/24/18	6.06	3.57	1.074	0.027					
05/25/18	6.017	3.86	1.719	0.019					
05/26/18	5.951	4.455	1.182	0.01					
05/27/18	5.819	4.522	0.925	0.012					
05/28/18	6.224	4.544	1.099	0.012					
05/29/18	6.185	4.751	1.611	0.033	366	3.2	310	1.4	
05/30/18	6.059	3.84	2.402	0.021					

Appendix C: Local Limits Data Summary

05/31/18	6.154	3.274	1.928	0.017					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
06/01/18	6.032	3.168	1.227	0.029					
06/02/18	6.138	4.43	1.335	0.012					
06/03/18	6.179	4.144	1.433	0.01					
06/04/18	6.16	3.93	1.779	0.024					
06/05/18	6.134	3.499	2.195	0.021	353	2.4	312	2.1	ND
06/06/18	6.072	4.149	1.555	0.024					
06/07/18	6.099	4.375	1.172	0.033					
06/08/18	6.127	4.218	1.346	0.022					
06/09/18	6.021	3.618	1.613	0.007					
06/10/18	6.046	4.549	1.127	0.004					
06/11/18	5.977	4.242	1.262	0.023					
06/12/18	5.964	4.262	2.172	0.028	370	2.6	308	2	
06/13/18	6.023	3.328	2.273	0.019					
06/14/18	5.968	2.935	2.062	0.022					
06/15/18	5.989	2.901	2.377	0.027					
06/16/18	5.907	3.896	2.251	0.011					
06/17/18	5.862	3.311	1.381	0.012					
06/18/18	6.059	3.48	2.098	0.023					
06/19/18	6.058	2.76	3.519	0.027	338	2.9	293	3.5	
06/20/18	6.04	2.289	3.263	0.025					
06/21/18	5.945	3.591	2.31	0.022					
06/22/18	5.948	3.19	2.031	0.025					
06/23/18	5.856	3.307	2.186	0.012					
06/24/18	5.949	3.373	1.753	0.011					
06/25/18	5.968	3.816	1.623	0.02					
06/26/18	6.005	4.346	1.921	0.028	328	<2	272	2	
06/27/18	5.972	3.633	2.191	0.02					
06/28/18	5.974	3.606	1.751	0.026					
06/29/18	6.003	3.23	2.039	0.025					
06/30/18	5.917	3.214	1.896	0.012					
07/01/18	5.863	3.235	2.031	0.01					
07/02/18	6.002	3.979	1.818	0.019	424	2.2	406	1.2	ND
07/03/18	6.002	4.373	1.301	0.027					
07/04/18	5.883	3.611	1.754	0.011					
07/05/18	5.762	3.036	2.095	0.021					

Appendix C: Local Limits Data Summary

07/06/18	5.842	2.749	2.538	0.02					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
07/07/18	5.766	3.092	2.697	0.011					
07/08/18	5.759	2.937	2.147	0.01					
07/09/18	5.903	3.936	1.585	0.022					
07/10/18	5.876	3.167	3.797	0.027	392	2.4	352	1.3	
07/11/18	5.991	2.15	3.445	0.021					
07/12/18	5.98	2.201	2.157	0.02					
07/13/18	5.936	2.802	2.247	0.027					
07/14/18	6.023	3.431	2.339	0.01					
07/15/18	5.918	3.583	1.873	0.011					
07/16/18	6.026	3.929		0.022					
07/17/18	6.022	3.486	2.592	0.016					
07/18/18	6.013	2.539	2.668	0.019	335	3	302	1.8	
07/19/18	6.014	2.548	2.243	0.022					
07/20/18	5.991	3.005	2.717	0.025					
07/21/18	5.945	3.017	2.702	0.01					
07/22/18	5.953	3.01	2.092	0.011					
07/23/18	6.112	3.614	2.636	0.028					
07/24/18	6.004	3.682	2.461	0.018	308	2.7	296	2.9	
07/25/18	5.928	2.692	2.812	0.022					
07/26/18	6.04	2.102	2.67	0.023					
07/27/18	5.969	2.629	3.101	0.021					
07/28/18	5.967	3.446	2.066	0.011					
07/29/18	5.898	2.982	2.123	0.01					
07/30/18	5.895	3.291	2.2	0.024					
07/31/18	5.972	3.792	2.254	0.031	385	<2	298	2	
08/01/18	5.945	3.011	2.761	0.022					
08/02/18	5.887	2.289	3.026	0.015					
08/03/18	5.895	2.752	2.512	0.027					
08/04/18	5.852	3.081	2.306	0.011					
08/05/18	5.846	3.205	1.996	0.01					
08/06/18	5.894	2.956	2.626	0.016					
08/07/18	5.928	3.28	2.481	0.025	412	<2	368	1.4	ND
08/08/18	5.893	3.632	2.619	0.022					
08/09/18	5.863	2.194	2.862	0.018					
08/10/18	5.872	2.174	2.529	0.025					

Appendix C: Local Limits Data Summary

08/11/18	5.883	3.45	2.282	0.01					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
08/12/18	5.857	3.662	1.933	0.011					
08/13/18	5.93	3.019	2.607	0.016					
08/14/18	5.914	3.921	2.535	0.028	382	<2	356	1.5	
08/15/18	6.032	2.796	2.899	0.021					
08/16/18	5.994	3.202	2.256	0.021					
08/17/18	5.872	1.95	2.916	0.026					
08/18/18	5.969	2.62	3.224	0.01					
08/19/18	6.044	3.004	2.398	0.01					
08/20/18	6.05	2.917	2.495	0.015					
08/21/18	5.985	3.88	2.735	0.024	330	<2	316	1.4	
08/22/18	5.986	3.164	2.299	0.017					
08/23/18	5.966	2.536	2.129	0.02					
08/24/18	5.972	3.744	1.77	0.034					
08/25/18	5.928	4.078	1.696	0.009					
08/26/18	6.008	3.761	1.26	0.011					
08/27/18	5.972	3.908	1.557	0.015					
08/28/18	5.907	4.642	1.385	0.026	387	<2	294	1	
08/29/18	5.924	4.189	1.784	0.027					
08/30/18	5.866	4.19	1.791	0.021					
08/31/18	5.916	3.231	2.254	0.025					
09/01/18	5.76	3.728	1.941	0.01					
09/02/18	5.561	3.513	1.449	0.009					
09/03/18	6.009	4.141	1.392	0.01					
09/04/18	5.86	4.681	1.34	0.024	362	<2	340	1.5	
09/05/18	5.835	3.98	1.473	0.028					ND
09/06/18	5.844	3.951	1.367	0.015					
09/07/18	5.851	3.564	1.999	0.032					
09/08/18	5.916	3.488	2.29	0.009					
09/09/18	6.079	4.537	1.2	0.01					
09/10/18	6.013	4.785	1.703	0.026					
09/11/18	5.921	5.221	1.386	0.024	365	2.4	352	3.2	
09/12/18	5.891	3.412	1.465	0.02					
09/13/18	5.851	2.749	2.186	0.018					
09/14/18	5.845	3.493	2.753	0.025					
09/15/18	5.916	3.935	2.01	0.009					

Appendix C: Local Limits Data Summary

09/16/18	6.055	4.077	1.703	0.009					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
09/17/18	5.887	3.879	1.71	0.033					
09/18/18	5.796	3.384	2.361	0.02	361	2.3	324	2.8	
09/19/18	5.86	2.903	2.597	0.019					
09/20/18	5.923	4.58	1.398	0.023					
09/21/18	5.873	3.59	0.729	0.02					
09/22/18	5.971	3.394	1.522	0.008					
09/23/18	6.07	3.72	1.725	0.01					
09/24/18	5.901	4.836	0.66	0.019					
09/25/18	5.893	4.503	0.965	0.021	395	3.1	300	2	
09/26/18	5.874	3.194	2.597	0.013					
09/27/18	5.783	3.8	2.028	0.019					
09/28/18	5.743	4.657	2.038	0.02					
09/29/18	5.862	4.699	1.114	0.009					
09/30/18	5.946	4.189	1.108	0.007					
10/01/18	5.81	3.564	2.094	0.019					
10/02/18	5.78	4.889	0.947	0.03	385	2.4	312	2.4	ND
10/03/18	5.795	4.621	1.111	0.016					
10/04/18	5.781	4.812	0.669	0.025					
10/05/18	5.797	4.799	1.008	0.024					
10/06/18	5.949	4.595	1.105	0.009					
10/07/18	5.971	4.279	1.477	0.007					
10/08/18	5.984	4.855	1.096	0.021					
10/09/18	5.897	4.436	1.449	0.03	359	2.5	312	1.7	
10/10/18	5.849	4.689	1.309	0.021					
10/11/18	5.735	4.375	1.348	0.014					
10/12/18	5.807	3.13	1.992	0.025					
10/13/18	5.896	4.103	1.351	0.007					
10/14/18	5.937	4.466	0.868	0.007					
10/15/18	5.868	4.825	0.963	0.027					
10/16/18	5.878	4.957	1.095	0.024	356	<2	336	1.3	
10/17/18	5.444	4.5	1.473	0.022					
10/18/18	5.79	3.248	1.769	0.014					
10/19/18	5.772	4.378	1.362	0.028					
10/20/18	5.895	4.599	1.088	0.008					
10/21/18	6.02	4.935	0.826	0.007					

Appendix C: Local Limits Data Summary

10/22/18	5.869	4.331	1.401	0.016					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
10/23/18	5.842	4.508	1.157	0.015					
10/24/18	6.062	5.096	1.05	0.021	346	2.4	298	2.4	
10/25/18	5.811	2.792	1.773	0.018					
10/26/18	5.784	4.015	1.167	0.028					
10/27/18	5.875	3.747	1.74	0.008					
10/28/18	5.952	4.889	0.862	0.007					
10/29/18	5.883	5.149	0.696	0.015					
10/30/18	5.813	4.369	0.775	0.025	376	<2	312	1.2	
10/31/18	5.776	4.481	1.132	0.021					
11/01/18	5.787	4.642	1.106	0.016					
11/02/18	5.865	5.047	0.612	0.029					
11/03/18	5.924	4.923	0.735	0.008					
11/04/18	6.243	5.143	0.791	0.008					
11/05/18	5.977	4.816	0.888	0.022					
11/06/18	5.911	4.465	1.268	0.024					
11/07/18	5.914	4.888	0.836	0.016	379	2.5	274	1.6	
11/08/18	5.821	4.803	0.803	0.017					
11/09/18	5.799	4.902	0.691	0.027					
11/10/18	5.858	4.867	0.798	0.007					
11/11/18	5.823	4.3	0.73	0.006					
11/12/18	6.064	4.837	0.628	0.008					
11/13/18	5.816	4.657	0.964	0.022					
11/14/18	5.838	4.658	0.951	0.03	401	2.1	336	1.4	
11/15/18	5.861	4.972	0.757	0.022					
11/16/18	5.848	5.166	0.535	0.028					
11/17/18	6.034	5.164	0.596	0.007					
11/18/18	5.945	5.017	0.642	0.007					
11/19/18	5.859	5.288	0.306	0.029					
11/20/18	5.983	5.51	0.196	0.017	395	<2	306	1.5	
11/21/18	6.285	5.95	0.096	0.027					
11/22/18	6.132	5.78	0.134	0.006					
11/23/18	5.704	4.898	0.632	0.007					
11/24/18	5.851	5.09	0.575	0.005					
11/25/18	6.085	5.606	0.284	0.007					
11/26/18	5.835	5.817	0.172	0.023					

Appendix C: Local Limits Data Summary

11/27/18	5.76	5.22	0.444	0.015	366	2.7	316	2.1	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
11/28/18	5.99	4.838	0.202	0.016					
11/29/18	7.312	6.927	0	0.008					
11/30/18	6.032	5.568	0.131	0.029					
12/01/18	6.012	5.535	0.122	0.008					
12/02/18	6.142	5.642	0.062	0.006					
12/03/18	6.04	4.493	1.248	0.016					
12/04/18	5.867	4.673	0.931	0.025	498	2.1	438	1.7	ND
12/05/18	6.03	4.945	0.804	0.014					
12/06/18	5.912	5.038	0.661	0.015					
12/07/18	5.843	5.006	0.616	0.019					
12/08/18	5.922	5.22	0.408	0.006					
12/09/18	5.941	5.39	0.213	0.004					
12/10/18	5.842	5.157	0.44	0.015					
12/11/18	5.888	5.298	0.322	0.019	405	2.3	352	2	
12/12/18	5.892	5.032	0.566	0.018					
12/13/18	5.88	5.171	0.372	0.018					
12/14/18	5.873	5.186	0.386	0.024					
12/15/18	6.028	5.343	0.34	0.005					
12/16/18	6.228	5.552	0.293	0.003					
12/17/18	7.019	6.43	0.195	0.021					
12/18/18	6.045	5.331	0.329	0.014	344	2.5	320	1.5	
12/19/18	6.057	5.543	0.264	0.019					
12/20/18	5.955	5.504	0.222	0.012					
12/21/18	6.022	5.428	0.453	0.019					
12/22/18	6.109	5.705	0.219	0.004					
12/23/18	5.97	5.426	0.358	0.004	385	2.6	320	2.3	
12/24/18	6.286	5.645	0.222	0.004					
12/25/18	5.555	4.669	0.362	0.004					
12/26/18	6.036	5.188	0.341	0.027					
12/27/18	6.016	5.262	0.355	0.011					
12/28/18	5.936	5.374	0.322	0.022					
12/29/18	5.883	5.346	0.306	0.004					
12/30/18	5.719	5.247	0.26	0.005					
12/31/18	5.98	5.384	0.392	0.008					
01/01/19	5.418	4.906	0.349	0.005	381	2.6	298	2.3	

Appendix C: Local Limits Data Summary

01/02/19	5.886	5.465	0.236	0.023					ND

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
01/03/19	5.965	5.194	0.597	0.029					
01/04/19	5.973	5.334	0.467	0.022					
01/05/19	5.989	5.639	0.184	0.003					
01/06/19	7.838	7.168	0.225	0.006					
01/07/19	7.42	7.018	0.239	0.012					
01/08/19	6.192	5.854	0.231	0.023	351	2.6	308	2.6	
01/09/19	6.297	5.854	0.235	0.013					
01/10/19	6.133	5.563	0.455	0.016					
01/11/19	5.989	5.423	0.405	0.025					
01/12/19	6.07	5.799	0.086	0.005					
01/13/19	6.139	5.796	0.068	0.003					
01/14/19	6.034	5.77	0.001	0.026					
01/15/19	7.245	6.593	0.001	0.018	353	3.1	384	3.9	
01/16/19	7.377	6.64	0	0.021					
01/17/19	8.901	8.058	0.118	0.029					
01/18/19	6.767	5.881	0.283	0.027					
01/19/19	6.518	5.888	0	0.01					
01/20/19	6.258	5.735	0	0.009					
01/21/19	6.808	5.81	0.357	0.009					
01/22/19	6.299	4.852	0.873	0.025	343	2.5	300	2.1	
01/23/19	6.268	5.419	0.184	0.02					
01/24/19	6.166	5.201	0.304	0.023					
01/25/19	6.192	5.356	0.186	0.022					
01/26/19	6.106	5.224	0.331	0.01					
01/27/19	6.155	5.237	0.246	0.007					
01/28/19	6.167	5.201	0.332	0.015					
01/29/19	6.057	5.262	0.208	0.035	366	<2	336	1.7	
01/30/19	6.035	5.134	0.322	0.014					
01/31/19	6.489	5.558	0.137	0.017					
02/01/19	6.076	5.327	0.217	0.026					
02/02/19	7.725	7.12	0.099	0.01					
02/03/19	9.502	8.553	0	0.009					
02/04/19	8.917	8.117	0	0.022					
02/05/19	8.195	6.907	0.54	0.027	287	2.6	276	2.6	ND
02/06/19	7.462	6.342	0.652	0.022					

Appendix C: Local Limits Data Summary

02/07/19	7.069	6.138	0.463	0.021					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
02/08/19	7.072	6.276	0.259	0.028					
02/09/19	7.811	6.967	0	0.009					
02/10/19	8.374	7.107	0.39	0.009					
02/11/19	7.449	6.239	0.46	0.026					
02/12/19	7.149	5.206	0.706	0.024	358	4	334	3.4	
02/13/19	8.426	7.252	0.342	0.018					
02/14/19	9.995	8.995	0.038	0.013					
02/15/19	9.622	8.738	0	0.026					
02/16/19	9.161	8.225	0	0.008					
02/17/19	8.613	7.494	0.239	0.009					
02/18/19	8.49	7.347	0.241	0.01					
02/19/19	8.096	6.592	0.758	0.035	273	<2	308	2.1	
02/20/19	7.889	6.838	0.296	0.023					
02/21/19	7.815	6.413	0.669	0.017					
02/22/19	7.667	6.443	0.663	0.021					
02/23/19	7.497	6.411	0.334	0.009					
02/24/19	7.545	6.298	0.48	0.008					
02/25/19	7.579	6.278	0.591	0.026					
02/26/19	7.473	6.368	0.418	0.016	294	<2	250	1.3	
02/27/19	8.004	6.333	0.382	0.027					
02/28/19	7.759	6.104	0.47	0.024					
03/01/19	7.592	6.498	0.388	0.029					
03/02/19	9.062	7.888	0.323	0.008					
03/03/19	8.611	7.535	0.162	0.008					
03/04/19	8.24	6.803	0.653	0.037					
03/05/19	8.135	6.768	0.548	0.023			276	1.8	ND
03/06/19	9.343	8.169	0.313	0.021					
03/07/19	9.075	8.208	0.024	0.027					
03/08/19	8.737	7.635	0.236	0.019					
03/09/19	8.755	7.52	0.354	0.012					
03/10/19	9.386	8.276	0.182	0.009	390	<2			
03/11/19	8.881	7.555	0.428	0.029					
03/12/19	8.862	7.703	0.376	0.018	260	2.3	250	1.7	
03/13/19	8.65	7.402	0.394	0.028					
03/14/19	8.474	7.226	0.423	0.029					

Appendix C: Local Limits Data Summary

03/15/19	8.359	7.298	0.252	0.027					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
03/16/19	8.02	7.281	0.259	0.01					
03/17/19	8.387	7.437	0.149	0.007					
03/18/19	8.275	7.23	0.252	0.035					
03/19/19	8.155	7.326	0	0.02	275	2	284	1.4	
03/20/19	8.46	7.675	0	0.02					
03/21/19	8.179	7.332	0.162	0.024					
03/22/19	7.951	6.157	0.983	0.028					
03/23/19	8.667	7.821	0	0.009					
03/24/19	8.365	7.127	0.415	0.005					
03/25/19	8.252	6.977	0.467	0.03					
03/26/19	8.202	6.765	0.102	0.017	292	<2	312	1.2	
03/27/19	8.179	6.588	0.403	0.032					
03/28/19	8.061	7.13	0.363	0.028					
03/29/19	8.063	6.853	0.568	0.023					
03/30/19	7.939	6.718	0.504	0.009					
03/31/19	7.915	6.907	0.19	0.008					
04/01/19	7.966	6.933	0.36	0.032					
04/02/19	7.745	6.667	0.279	0.026	293	2	304	1.5	ND
04/03/19	7.806	6.543	0.617	0.025					
04/04/19	7.667	6.836	0.191	0.025					
04/05/19	7.579	6.541	0.332	0.03					
04/06/19	7.489	6.374	0.408	0.009					
04/07/19	7.524	6.508	0.256	0.007					
04/08/19	7.585	6.407	0.479	0.029					
04/09/19	7.349	5.888	0.812	0.017	301	<2	264	1.1	
04/10/19	7.38	5.98	0.913	0.016					
04/11/19	7.31	5.763	0.744	0.027					
04/12/19	7.349	5.606	0.614	0.027					
04/13/19	7.345	6.081	0.604	0.008					
04/14/19	7.489	6.177	0.57	0.008					
04/15/19	7.421	6.009	0.74	0.031					
04/16/19	7.287	5.931	0.85	0.013	298	<2	272	1	
04/17/19	7.422	5.88	0.782	0.025					
04/18/19	7.276	5.509	1.186	0.038					
04/19/19	7.421	6.024	0.84	0.027					

Appendix C: Local Limits Data Summary

04/20/19	7.273	5.738	0.941	0.009					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
04/21/19	7.168	5.384	0.338	0					
04/22/19	7.177	5.177	1.083	0.031					
04/23/19	7.17	5.394	1.529	0.017	350	3	328	1.8	
04/24/19	7.16	5.993	1.41	0.03					
04/25/19	7.059	5.352	1.527	0.023					
04/26/19	7.048	5.44	1.261	0.025					
04/27/19	7.013	5.235	1.211	0.009					
04/28/19	7.066	5.435	0.949	0.01					
04/29/19	6.92	5.248	1.4	0.025					
04/30/19	6.796	5.109	1.575	0.04	337	3.4	288	3.2	
05/01/19	7.974	4.197	1.341	0.019					
05/02/19	6.721	4.01	1.78	0.033					
05/03/19	6.677	4.943	1.144	0.022					
05/04/19	6.777	4.811	1.552	0.009					
05/05/19	6.808	5.355	0.852	0.009					
05/06/19	6.718	4.454	2.082	0.033					
05/07/19	6.686	4.958	1.483	0.021	338	2.5	326	3.3	ND
05/08/19	6.605	4.541	1.799	0.028					
05/09/19	6.563	4.284	1.224	0.022					
05/10/19	6.547	4.693	1.418	0.024					
05/11/19	6.597	4.977	1.216	0.009					
05/12/19	6.484	5.044	0.928	0.01					
05/13/19	6.639	3.81	1.874	0.026					
05/14/19	6.511	4.61	1.897	0.019	353	2.1	308	1.6	
05/15/19	6.655	4.552	1.364	0.018					
05/16/19	6.919	6.099	0.557	0.029					
05/17/19	6.55	5.922	0.137	0.023					
05/18/19	6.783	6.022	0.187	0					
05/19/19	7.439	6.456	0.098	0.009					
05/20/19	7.033	7.098	0.163	0.008					
05/21/19	7.011	6.401	0	0	326	2.3	296	2	
05/22/19	6.978	6.271	0	0					
05/23/19	6.929	6.141	0.363	0					
05/24/19	6.821	5.119	1.335	0					
05/25/19	6.72	4.073	1.459	0					

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05/26/19	6.529	4.992	1.111	0					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
05/27/19	6.954	6.292	0	0					
05/28/19	6.806	5.965	0.21	0.029	337	2.7	256	2.5	
05/29/19	6.871	5.989	0.268	0.019					
05/30/19	6.843	6.094	0.018	0.026					
05/31/19	6.742	5.562	0.63	0.033					
06/01/19	6.858	5.022	1.278	0.012					
06/02/19	6.946	5.043	0.912	0.011					
06/03/19	6.807	4.887	1.311	0.035					
06/04/19	6.799	5.714	1.248	0.023	378	4.6	292	3.1	ND
06/05/19	6.726	5.227	1.616	0.025					
06/06/19	6.628	4.935	1.166	0.029					
06/07/19	6.696	5.155	0.738	0.029					
06/08/19	6.628	3.743	2.067	0.011					
06/09/19	6.526	3.926	1.724	0.011					
06/10/19	6.505	4.608	1.465	0.028					
06/11/19	6.448	4.998	1.798	0.031	412	4	316	2.4	
06/12/19	6.58	4.25	1.896	0.026					
06/13/19	6.488	3.679	1.899	0.026					
06/14/19	6.525	4.574	1.327	0.033					
06/15/19	6.455	4.631	1.401	0.007					
06/16/19	6.394	4.802	1.024	0.008	250	2.3			
06/17/19	6.466	4.49	1.517	0.035					
06/18/19	6.383	4.569	2.142	0.031	324	3.8	326	3.5	
06/19/19	6.37	4.475	1.811	0.02					
06/20/19	6.282	3.984	1.996	0.038					
06/21/19	6.293	4.301	1.505	0.021					
06/22/19	6.239	4.24	1.605	0.007					
06/23/19	6.246	4.317	1.513	0.005					
06/24/19	6.153	4.478	1.183	0.025					
06/25/19	6.24	4.782	1.922	0.028		3	272	2.6	
06/26/19	6.281	3.177	2.203	0.02					
06/27/19	6.191	3.81	1.651	0.018					
06/28/19	6.214	4.063	1.711	0.024					
06/29/19	6.214	4.717	1.777	0.024					
06/30/19	4.779	4.52	1.136	0.002					

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07/01/19	6.164	3.376	2.407	0.03					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
07/02/19	6.182	4.075	1.766	0.02	327	2	280	1.5	
07/03/19	6.165	3.109	2.032	0.026					ND
07/04/19	6.026	3.303	1.814	0.011					
07/05/19	5.94	4.276	0.981	0.019					
07/06/19	5.916	3.983	1.858	0.012					
07/07/19	6.086	4.254	1.743	0.01					
07/08/19	6.135	3.759	1.789	0.032					
07/09/19	6.109	4.174	1.74	0.021					
07/10/19	6.135	3.359	1.832	0.01	339	<2	328	1	
07/11/19	6.092	3.046	2.328	0.035					
07/12/19	6.186	4.134	1.812	0.023					
07/13/19	6.084	3.896	2.068	0.011					
07/14/19	6.076	3.858	1.73	0.009					
07/15/19	6.116	3.785	1.884	0.025					
07/16/19	6.06	4.338	2.081	0.035	306	2	246	2	
07/17/19	6.072	2.989	2.55	0.024					
07/18/19	6.034	3.245	2.074	0.036					
07/19/19	6.057	3.826	2.14	0.02					
07/20/19	6.121	4.233	1.67	0.01					
07/21/19	6.087	4.36	1.058	0.01					
07/22/19	6.112	3.495	2.556	0.029					
07/23/19	6.083	4.254	1.979	0.022					
07/24/19	6.048	3.853	1.849	0.022	331	2	280	2	
07/25/19	6.047	3.339	2.859	0.036					
07/26/19	6.165	3.339	2.551	0.025					
07/27/19	6.141	2.96	1.826	0.009					
07/28/19	6.068	3.619	1.554	0.007					
07/29/19	6.023	3.883	1.474	0.031					
07/30/19	6.053	3.985		0.021	336	2.7	292	2	
07/31/19	6.035	3.368							
08/01/19	6.037	3.925	1.526	0.031					
08/02/19	6.1	4.227	1.492	0.019					
08/03/19	6.071	4	1.691	0.01					
08/04/19	6.053	4.017	1.592	0.009					
08/05/19	6.086	3.43	2.248	0.039					

Appendix C: Local Limits Data Summary

08/06/19	6.005	3.948	2.175	0.03	334	2.5	320	2.2	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
08/07/19	5.985	3.171	2.374	0.016					
08/08/19	6.041	2.818	2.209	0.036					
08/09/19	5.977	3.771	2.167	0.021					
08/10/19	6.024	4.032	1.865	0.006					
08/11/19	6.083	4.042	1.731	0.003					
08/12/19	6.037	3.436	2.041	0.026					
08/13/19	6.113	3.667	2.184	0.019	358	2.9	334	4.2	
08/14/19	6.111	3.244	2.051	0.026					
08/15/19	6.119	3.321	2.641	0.035					
08/16/19	6.122	3.474	2.685	0.028					
08/17/19	6.353	3.961	2.102	0.01					
08/18/19	6.303	3.249	1.677	0.01					
08/19/19	6.113	3.7	1.727	0.037					
08/20/19	6.1	4.657	1.633	0.019	332	<2.3	300	2	
08/21/19	6.073	3.438	2.916	0.024					
08/22/19	6.049	3.47	2.595	0.037					
08/23/19	6.006	4.021	1.987	0.021					
08/24/19	6.236	4.128	1.753	0.008					
08/25/19	6.271	5.623	0.875	0.004					
08/26/19	6.157	3.941	2.147	0.031					
08/27/19	5.978	3.944	2.195	0.025	358	3.6	304	2.5	
08/28/19	5.986	3.229	2.365	0.029					
08/29/19	6.013	3.986	1.448	0.029					
08/30/19	5.99	4.26	1.281	0.02					
08/31/19	5.959	4.216	1.449	0.011					
09/01/19	5.741	4.234	1.13	0.009					
09/02/19	6.22	3.875	2.11	0.011					
09/03/19	6.095	3.966	2.228	0.031	348	2.1	316	1.9	
09/04/19	6.031	3.345	2.102	0.016					
09/05/19	5.956	3.702	1.495	0.037					
09/06/19	5.883	4.293	1.719	0.034					
09/07/19	6.016	4.933	1.348	0.001					
09/08/19	6.192	5.114	1.259	0					
09/09/19	6.059	4.764	1.523	0.019					
09/10/19	5.933	4.726	1.867	0.018	364	2.1	338	2.2	

Appendix C: Local Limits Data Summary

09/11/19	5.945	4.37	1.483	0.023					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
09/12/19	5.919	3.94	1.663	0.024					
09/13/19	5.932	4.409	1.818	0.035					
09/14/19	6.066	4.834	1.467	0.01					
09/15/19	6.242	5.844	0.415	0.009					
09/16/19	6.062	5.045	1.168	0.037					
09/17/19	5.989	4.639	2.14	0.021	352	<2	304	1.9	
09/18/19	6.019	4.254	1.582	0.027					
09/19/19	5.949	4.65	1.165	0.029					
09/20/19	5.976	5.308	0.425	0.024					
09/21/19	6.016	4.238	1.881	0.007					
09/22/19	6.13	4.889	1.142	0.011					
09/23/19	6.019	3.911	2.118	0.026					
09/24/19	5.939	4.649	1.706	0.029	300	<2	280	1.4	
09/25/19	5.977	4.482	1.815	0.023					
09/26/19	5.945	4.153	1.285	0.022					
09/27/19	6.001	4.227	1.347	0.02					
09/28/19	6.083	5.213	0.838	0.005					
09/29/19	6.09	5.143	0.897	0.003					
09/30/19	5.963	4.505	1.451	0.028					
10/01/19	6.01	4.876	1.217	0.016	342	2.05	364	1.75	ND
10/02/19	6.101	5.151	1.103	0.022					
10/03/19	5.975	5.147	0.908	0.029					
10/04/19	5.882	4.477	1.461	0.024					
10/05/19	5.914	4.701	1.264	0.005					
10/06/19	6.05	4.962	1.072	0.004					
10/07/19	5.902	4.289	1.762	0.034					
10/08/19	5.938	4.953	1.218	0.027	356	1.8	282	1.2	
10/09/19	5.97	4.922	1.196	0.029					
10/10/19	5.694	4.329	0.867	0.033					
10/11/19	5.821	4.971	0.862	0.027					
10/12/19	5.92	5.023	0.906	0.008					
10/13/19	5.99	4.721	0.758	0.009					
10/14/19	5.951	4.672	1.093	0.036					
10/15/19	5.81	4.729	1.465	0.021	359	1.66	284	1.4	
10/16/19	5.828	5.092	1.056	0.019					

Appendix C: Local Limits Data Summary

10/17/19	5.725	5.172	0.684	0.028					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
10/18/19	5.83	5.24	0.652	0.019					
10/19/19	5.965	5.293	0.726	0.009					
10/20/19	6.049	5.356	0.688	0.009					
10/21/19	5.884	4.895	1.024	0.024					
10/22/19	5.82	4.798	1.417	0.02	349	1.31	298	2.7	
10/23/19	5.822	4.255	1.233	0.024					
10/24/19	5.826	4.19	1.467	0.015					
10/25/19	5.805	4.479	0.935	0.036					
10/26/19	6.034	4.775	0.804	0.008					
10/27/19	5.904	5.358	0.759	0.005					
10/28/19	5.93	3.997	0.694	0.02					
10/29/19	5.99	3.993	0.649	0.024	361	1.7	364	1.35	
10/30/19	5.88	4.711	0.649	0.019					
10/31/19	5.701	5.028	0.487	0.033					
11/01/19	5.781	5.408	0.413	0					
11/02/19	5.971	5.357	0.723	0					
11/03/19	5.991	5.583	0.517	0					
11/04/19	5.885	4.957	1.02	0.001					
11/05/19	5.77	4.914	0.991	0.021	353	1.71	264	1.4	ND
11/06/19	5.8	5.159	0.767	0.014					
11/07/19	5.767	5.51	0.438	0.034					
11/08/19	5.796	5.371	0.475	0.023					
11/09/19	5.872	5.435	0.477	0.009					
11/10/19	5.84	5.477	0.441	0.009					
11/11/19	5.985	5.283	0.75	0.009					
11/12/19	5.808	5.088	0.824	0.041	374	1.48	332	1.1	
11/13/19	5.784	5.341	0.498	0.023					
11/14/19	5.802	5.253	0.652	0.025					
11/15/19	5.849	5.138	0.753	0.023					
11/16/19	6.05	5.102	0.32	0.008					
11/17/19	6.054	5.433	0.632	0.004					
11/18/19	5.892	5.271	0.668	0.025					
11/19/19	5.83	5.013	0.901	0.026	413	1.91	344	0.9	
11/20/19	5.844	5.46	0.399	0.025					
11/21/19	5.823	5.251	0.393	0.029					

Appendix C: Local Limits Data Summary

11/22/19	5.78	4.954	0.714	0.023					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
11/23/19	6.077	5.716	0.446	0.009					
11/24/19	5.915	5.548	0.463	0.008					
11/25/19	5.832	5.075	0.891	0.031					
11/26/19	5.919	5.89	0.117	0.028	386	3.06	336	1.95	
11/27/19	6.53	6.101	0.497	0.027					
11/28/19	6.514	6.502	0	0.007					
11/29/19	5.733	5.606	0.183	0.004					
11/30/19	6.042	6.102	0	0.012					
12/01/19	7.495	7.166	0.28	0.008					
12/02/19	8.24	7.57	0.641	0.027					
12/03/19	6.592	6.216	0.406	0.022	311	3.2	266	2.7	
12/04/19	7.568	7.48	0.159	0.026					
12/05/19	6.486	5.928	0.532	0.028					
12/06/19	6.244	5.666	0.003	0.02					
12/07/19	6.323	5.721	0	0.001					
12/08/19	6.823	6.002	0.191	0.002					
12/09/19	6.369	5.255	0.528	0.029					
12/10/19	6.215	5.508	0.135	0.022	324	2.1	304	2.1	
12/11/19	6.212	5.23	0.403	0.027					
12/12/19	6.093	5.12	0.489	0.039					
12/13/19	6.135	5.544	0	0.019					
12/14/19	6.233	5.585	0	0.005					
12/15/19	6.218	5.541	0.667	0.006					
12/16/19	6.14	5.307	0.526	0.025					
12/17/19	6.051	4.576	0.138	0.022	340	1.7	286	1.2	
12/18/19	6.104	4.973	0.627	0.017					
12/19/19	6.101	5.499	0.079	0.025					
12/20/19	6.126	5.082	0.49	0.023					
12/21/19	6.167	5.545	0	0					
12/22/19	6.198	5.585	0	0.004					
12/23/19	6.213	5.119	0.486	0.016					
12/24/19	6.582	5.621	0.36	0.018	413	3.5	320	3.2	
12/25/19	5.723	5.152	0	0.001					
12/26/19	6.208	5.619	0.136	0					
12/27/19	6.218	5.301	0.358	0.017					

Appendix C: Local Limits Data Summary

12/28/19	6.088	5.132	0.001	0					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
12/29/19	6.048	4.968	0.521	0.006					
12/30/19	6.125	5.34	0.141	0.026					
12/31/19	6.404	5.337	0.408	0.006					
01/01/20	5.667	4.983	0.097	0	352	2.2	310	1.7	
01/02/20	6.042	5.302	0.286	0.017					
01/03/20	6.143	5.427	0.131	0.034					
01/04/20	6.092	5.462	0	0.004					
01/05/20	6.171	5.085	0.46	0.012					
01/06/20	6.118	5.406	0.064	0.029					
01/07/20	6.073	5.029	0.678	0.023	404	2.25	536	1.95	ND
01/08/20	6.087	5.274	0.217	0.022					
01/09/20	6.138	5.608	0	0.036					
01/10/20	6.068	4.998	0.544	0.026					
01/11/20	6.151	5.51	0	0.01					
01/12/20	6.261	5.507	0.068	0.008					
01/13/20	6.136	5.109	0.47	0.018					
01/14/20	6.057	5.445	0	0.037	328	2.7	298	2.8	
01/15/20	6.11	5.116	0.474	0.021					
01/16/20	6.55	5.439	0	0.028					
01/17/20	6.273	5.628	0	0.028					
01/18/20	6.191	5.41	0.139	0.01					
01/19/20	5.989	5.074	0.32	0.009					
01/20/20	6.255	5.587	0	0.011					
01/21/20	6.169	5.284	0.295	0.032	378	3.28	364	2.5	
01/22/20	6.055	5.261	0.18	0.031					
01/23/20	6.157	5.325	0.279	0.032					
01/24/20	6.132	5.472	0.072	0.031					
01/25/20	6.194	5.553	0	0.01					
01/26/20	6.254	5.107	0.548	0.009					
01/27/20	6.148	5.524	0	0.018					
01/28/20	6.038	5.055	0.387	0.027	360	2.07	342	2.2	
01/29/20	6.025	5.384	0.047	0.008					
01/30/20	6.058	5.543	0	0.02					
01/31/20	6.139	4.719	0.555	0.045					
02/01/20	6.364	5.702	0	0.009					

Appendix C: Local Limits Data Summary

02/02/20	6.4	5.393	0.385	0.005					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
02/03/20	6.119	5.175	0.4	0.02					
02/04/20	6.117	4.87	0.503	0.033	356	3.13	356	2.55	ND
02/05/20	6.149	5.139	0.432	0.027					
02/06/20	6.082	5.38	0.17	0.02					
02/07/20	6.092	5.001	0.573	0.022					
02/08/20	6.224	5.573	0	0.006					
02/09/20	6.266	5.341	0.272	0.009					
02/10/20	6.174	5.38	0.206	0.034					
02/11/20	6.059	5.437	0	0.026	325	2.27	298	4.4	
02/12/20	6.057	4.934	0.639	0.027					
02/13/20	5.993	5.471	0.001	0.024					
02/14/20	6.055	5.228	0.228	0.026					
02/15/20	6.039	5.156	0.307	0.005					
02/16/20	5.896	5.293	0.026	0					
02/17/20	6.076	4.923	0.591	0.007					
02/18/20	6.006	5.18	0.238	0.026	351	2.25	280	1.95	
02/19/20	5.932	4.426	0.242	0.039					
02/20/20	5.898	4.341	1.188	0.028					
02/21/20	5.79	4.752	0.689	0.03					
02/22/20	5.911	4.61	0.82	0.007					
02/23/20	6.046	5.322	0.125	0.012					
02/24/20	5.963	4.653	1.044	0.028					
02/25/20	5.896	5.029	0.353	0.016	370	2.46	326	2.6	
02/26/20	5.903	3.728	1.228	0.024					
02/27/20	5.935	4.408	0.986	0.027					
02/28/20	5.872	5.12	0.373	0.029					
02/29/20	6.097	5.336	0.179	0.008					
03/01/20	6.185	4.796	0.833	0.013					
03/02/20	6.013	5.35	0.052	0.025					
03/03/20	5.976	4.644	0.836	0.033	377	2.63	316	1.05	ND
03/04/20	6.072	4.962	0.602	0.028					
03/05/20	6.113	5.207	0.45	0.03					
03/06/20	6.076	4.921	0.616	0.031					
03/07/20	6.19	4.435	1.687	0.012					
03/08/20	6.366	5.699	0.015	0.008					

Appendix C: Local Limits Data Summary

03/09/20	6.219	4.858	0.811	0.026					

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
03/10/20	6.105	4.552	1.651	0.013	370	1.76	318	1.1	
03/11/20	6.133	4.525	0.559	0.001					
03/12/20	6.099	4.749	0.245	0.023					
03/13/20	6.148	5.309	0.283	0.026					
03/14/20	6.406	5.303	0.532	0.011					
03/15/20	8.407	7.589	0.09	0.006					
03/16/20	7.61	6.801	0.111	0.029					
03/17/20	6.856	5.976	0.225	0.015	327	2.95	264	2.95	
03/18/20	6.611	5.478	0.535	0.019					
03/19/20	6.59	5.249	0.806	0.014					
03/20/20	6.461	5.567	0.289	0.023					
03/21/20	6.502	5.83	0.003	0.009					
03/22/20	6.496	5.819	0	0.009					
03/23/20	6.496	5.276	0.636	0.028					
03/24/20	6.51	5.622	0.301	0.031	353	3.29	334	2.6	
03/25/20	6.58	5.939	0	0.023					
03/26/20	6.532	5.413	0.567	0.027					
03/27/20	6.465	5.733	0.086	0.024					
03/28/20	6.5	5.86	0	0.011					
03/29/20	6.467	5.833	0	0.01					
03/30/20	6.477	5.629	0.245	0.025					
03/31/20	6.467	4.998	0.984	0.024					
04/01/20	6.461	5.652	0.194	0.017			352		
04/02/20	6.398	5.8	0.001	0.015			388		
04/03/20	6.337	5.683	0	0.017			280		
04/04/20	6.328	5.737	0.003	0.002			290		
04/05/20	8.101	7.331	0	0			292		ND
04/06/20	7.538	6.808	0	0.014			284		
04/07/20	7.074	6.36	0	0.017	270	<2	276	2	
04/08/20	6.945	5.819	0.472	0.018			288		
04/09/20	6.835	5.949	0.318	0.025			348		
04/10/20	6.885	6.243	0.005	0.013			290		
04/11/20	6.872	6.176	0.004	0			228		
04/12/20	6.825	5.932	0.282	0			256		
04/13/20	6.775	5.589	0.589	0.019			348		

Appendix C: Local Limits Data Summary

04/14/20	6.732	5.761	0.342	0.013	360	8	284	2	

Appendix C: Local Limits Data Summary

Date	Influent Flow (mgd)	Secondary Effluent Flow (mgd)	Recycled Water Flow (mgd)	Septage (mgd)	Influent BOD (mg/L)	Effluent BOD (mg/L)	Influent TSS (mg/L)	Effluent TSS (mg/L)	Effluent Ammonia as N (mg/L)
04/15/20	6.674	6.061	0.001	0.014			288		
04/16/20	6.639	5.363	0.966	0.02			276		
04/17/20	6.636	5.145	0.387	0.019			290		
04/18/20	6.553	5.275	0.685	0			260		
04/19/20	6.703	5.991	0.088	0			288		
04/20/20	6.677	4.758	1.396	0.011			304		
04/21/20	6.587	5.145	0.984	0.035	200	4	288	3	
04/22/20	6.712	5.521	0.602	0.009			320		
04/23/20	6.693	5.324	1.044	0.013			280		
04/24/20	6.671	4.806	0.721	0.024			292		
04/25/20	6.58	4.563	0.673	0			274		
04/26/20	6.564	5.488	0.456	0			584		
04/27/20	6.513	4.694	1.284	0.016			334		
04/28/20	6.49	4.754	1.495	0.018	270	5	364	2	
04/29/20	6.383	4.093	2.204	0.017			340		
04/30/20	6.413	4.217	2.099	0.021			416		

Appendix C: Local Limits Data Summary

Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Collection	Ammonia as N	03/23/20	51	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/24/20	34	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/25/20	58	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/26/20	52	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/27/20	56	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/28/20	93	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Ammonia as N	03/29/20	74	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Collection	Arsenic	03/23/20	1.5	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/24/20	1.3	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/25/20	2.1	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/26/20	1.8	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/27/20	1	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/28/20	1.2	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Arsenic	03/29/20	1.1	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/23/20	310	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/24/20	240	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/25/20	220	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/26/20	340	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/27/20	200	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Biochemical Oxygen Demand	03/29/20	320	5	2	mg/L	SM5210B	Alpha Analytical	
Collection	Boron	03/23/20	0.72	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/24/20	0.27	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/25/20	0.25	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/26/20	J 0.095	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/27/20	J 0.19	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/28/20	0.51	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Boron	03/29/20	0.36	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Collection	Cadmium	03/23/20	0.14	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/24/20	0.14	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/25/20	1.1	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/26/20	0.35	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/27/20	0.34	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/28/20	0.15	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cadmium	03/29/20	0.21	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Chloride	03/23/20	110	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/24/20	81	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/25/20	65	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/26/20	65	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/27/20	64	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/28/20	77	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chloride	03/29/20	73	10	2	mg/L	EPA 300.0	Alpha Analytical	
Collection	Chromium	03/23/20	2.2	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Collection	Chromium	03/24/20	2.3	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Collection	Chromium	03/26/20	4.1	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Collection	Chromium	03/27/20	1.8	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Collection	Chromium	03/28/20	2.2	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Collection	Chromium	03/29/20	2.3	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/23/20	49	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/24/20	61	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/25/20	140	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/26/20	80	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/27/20	46	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/28/20	59	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Copper	03/29/20	63	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Cyanide (total)	03/23/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/24/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/25/20	J 3.1	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/26/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/27/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/28/20	J 2.5	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Cyanide (total)	03/29/20	J 2.4	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Collection	Lead	03/23/20	5.3	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/24/20	2.4	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/25/20	4.2	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/26/20	3	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/27/20	1.1	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/28/20	1.7	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Lead	03/29/20	1.9	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Collection	Mercury	03/23/20	0.036	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/24/20	0.02	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/25/20	0.065	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/26/20	0.045	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/27/20	0.022	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/28/20	0.022	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Mercury	03/29/20	0.16	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Collection	Molybdenum	03/23/20	2	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Molybdenum	03/24/20	2	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Molybdenum	03/25/20	3.1	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Molybdenum	03/26/20	2.5	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Molybdenum	03/27/20	1.8	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Molybdenum	03/29/20	1.5	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/23/20	3.9	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/24/20	3.8	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/25/20	9.5	2	1.2	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/26/20	5.6	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/27/20	4.7	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/28/20	4.5	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Nickel	03/29/20	4.9	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Collection	Selenium	03/24/20	0.77	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Selenium	03/25/20	1.4	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Collection	Selenium	03/26/20	1.7	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Selenium	03/28/20	0.98	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Selenium	03/29/20	1.2	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/23/20	0.21	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/24/20	0.23	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/25/20	0.32	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/26/20	0.18	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/27/20	0.11	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/28/20	0.2	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Silver	03/29/20	0.17	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Collection	Sodium	03/23/20	91	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/24/20	92	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/25/20	47	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/26/20	30	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/27/20	60	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/28/20	76	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sodium	03/29/20	84	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Collection	Sulfate as SO4	03/23/20	46	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/24/20	50	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/25/20	44	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/26/20	45	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/27/20	49	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/28/20	51	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Sulfate as SO4	03/29/20	54	10	4	mg/L	EPA 300.0	Alpha Analytical	
Collection	Total Dissolved Solids	03/23/20	590	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/24/20	560	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/25/20	550	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/26/20	600	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/27/20	600	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/28/20	840	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Dissolved Solids	03/29/20	800	10	10	mg/L	SM2540C	Alpha Analytical	
Collection	Total Suspended Solids	03/23/20	61	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Total Suspended Solids	03/24/20	58	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Total Suspended Solids	03/25/20	410	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Total Suspended Solids	03/26/20	180	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Total Suspended Solids	03/27/20	170	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Total Suspended Solids	03/28/20	250	1	0.3	mg/L	SM2540D	Alpha Analytical	
Collection	Zinc	03/23/20	160	5	4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Zinc	03/24/20	160	5	4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Zinc	03/25/20	390	5	4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Zinc	03/26/20	240	5	4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Zinc	03/27/20	120	5	4	ug/L	EPA 200.8	Alpha Analytical	
Collection	Zinc	03/28/20	160	5	4	ug/L	EPA 200.8	Alpha Analytical	

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Collection	Zinc	03/29/20		170	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Ammonia as N	04/02/20	<	0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	

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Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Effluent	Ammonia as N	04/03/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Ammonia as N	04/04/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Ammonia as N	04/05/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Ammonia as N	04/06/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Ammonia as N	04/07/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Ammonia as N	04/08/20	< 0.1	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Effluent	Arsenic	04/02/20	1.6	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/03/20	0.83	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/04/20	0.87	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/05/20	0.93	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/06/20	0.85	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/07/20	0.96	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Arsenic	04/08/20	2	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Boron	04/02/20	0.32	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/03/20	0.31	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/04/20	0.31	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/05/20	0.31	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/06/20	0.31	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/07/20	0.28	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Boron	04/08/20	0.29	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Cadmium	04/02/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/03/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/04/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/05/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/06/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/07/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cadmium	04/08/20	< 0.06	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chloride	04/02/20	200	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/03/20	200	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/04/20	200	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/05/20	200	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/06/20	190	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/07/20	170	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chloride	04/08/20	170	10	2	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Chromium	04/02/20	0.78	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/03/20	< 0.5	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/04/20	< 0.5	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/05/20	< 0.5	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/06/20	< 0.5	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/07/20	0.57	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Chromium	04/08/20	0.54	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Copper	04/03/20	< 2.7	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	Sample result qualified as non-detect because equipment blank contamination (0.65 µg/L)

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Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Effluent	Copper	04/04/20	< 3.2	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	Sample result qualified as non-detect because equipment blank contamination (0.65 µg/L)
Effluent	Copper	04/05/20	< 3.1	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	Sample result qualified as non-detect because equipment blank contamination (0.65 µg/L)
Effluent	Copper	04/06/20	3.9	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Copper	04/07/20	3.5	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Copper	04/08/20	4.7	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Cyanide (total)	04/02/20	6.5	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/03/20	J 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/04/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/05/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/06/20	5.4	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/07/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Cyanide (total)	04/08/20	2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Effluent	Lead	04/02/20	J 0.17	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/03/20	J 0.15	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/04/20	J 0.16	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/05/20	J 0.15	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/06/20	J 0.15	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/07/20	J 0.14	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Lead	04/08/20	J 0.12	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Mercury	04/02/20	0.00041	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/03/20	0.00044	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/04/20	0.00052	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/05/20	0.00076	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/06/20	0.00066	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/07/20	0.00102	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Mercury	04/08/20	0.00057	0.0005	0.0002	ug/L	EPA 1631E	Alpha Analytical	
Effluent	Molybdenum	04/02/20	0.93	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/03/20	0.85	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/04/20	0.81	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/05/20	0.77	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/06/20	0.71	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/07/20	0.69	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Molybdenum	04/08/20	0.71	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/02/20	2.3	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/03/20	2.7	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/04/20	2.8	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/05/20	2.7	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/06/20	2.6	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/07/20	2.3	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Nickel	04/08/20	1.4	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Effluent	Selenium	04/03/20	<	0.3	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Selenium	04/04/20	<	0.3	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	

Appendix C: Local Limits Data Summary

Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Effluent	Selenium	04/05/20	< 0.3	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Selenium	04/06/20	< 0.3	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Selenium	04/07/20	< 0.3	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Selenium	04/08/20	0.51	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/02/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/03/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/04/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/05/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/06/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/07/20	J 0.059	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Silver	04/08/20	< 0.05	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Sodium	04/02/20	140	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/03/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/04/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/05/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/06/20	120	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/07/20	120	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sodium	04/08/20	110	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Effluent	Sulfate as SO4	04/02/20	61	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/03/20	62	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/04/20	65	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/05/20	64	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/06/20	62	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/07/20	58	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfate as SO4	04/08/20	58	10	4	mg/L	EPA 300.0	Alpha Analytical	
Effluent	Sulfide	04/02/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/03/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/04/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/05/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/06/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/07/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Sulfide	04/08/20	< 0.05	0.1	0.05	mg/L	SM4500-S2 D	Alpha Analytical	
Effluent	Total Dissolved Solids	04/02/20	680	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/03/20	700	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/04/20	710	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/05/20	670	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/06/20	700	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/07/20	570	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Total Dissolved Solids	04/08/20	660	10	10	mg/L	SM2540C	Alpha Analytical	
Effluent	Zinc	04/02/20	74	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Zinc	04/03/20	75	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Zinc	04/04/20	72	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Zinc	04/05/20	72	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Zinc	04/06/20	66	5	4	ug/L	EPA 200.8	Alpha Analytical	
Effluent	Zinc	04/07/20	66	5	4	ug/L	EPA 200.8	Alpha Analytical	

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Effluent	Zinc	04/08/20	63	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Ammonia as N	03/30/20	54	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	

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Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Influent	Ammonia as N	03/31/20	48	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Ammonia as N	04/01/20	45	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Ammonia as N	04/02/20	45	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Ammonia as N	04/03/20	52	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Ammonia as N	04/04/20	37	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Ammonia as N	04/05/20	35	0.2	0.1	mg/L	SM4500NH3B,C	Alpha Analytical	
Influent	Arsenic	03/30/20	1.1	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	03/31/20	1.2	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	04/01/20	1.3	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	04/02/20	2.7	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	04/03/20	1.5	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	04/04/20	1.8	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Arsenic	04/05/20	1.3	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Boron	03/30/20	0.32	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	03/31/20	0.3	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	04/01/20	0.3	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	04/02/20	0.3	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	04/03/20	0.31	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	04/04/20	0.46	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Boron	04/05/20	0.32	0.2	0.06	mg/L	EPA 200.7	Alpha Analytical	
Influent	Cadmium	03/30/20	J 0.081	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	03/31/20	0.11	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	04/01/20	0.17	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	04/02/20	0.46	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	04/03/20	0.24	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	04/04/20	0.26	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cadmium	04/05/20	0.18	0.1	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chloride	03/30/20	190	10	2	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	03/31/20	200	25	5	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	04/01/20	200	50	10	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	04/02/20	250	25	5	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	04/03/20	180	10	2	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	04/04/20	290	25	5	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chloride	04/05/20	210	10	2	mg/L	EPA 300.0	Alpha Analytical	
Influent	Chromium	03/30/20	1.6	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	03/31/20	3.2	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	04/01/20	3.9	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	04/02/20	10	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	04/03/20	12	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	04/04/20	11	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Chromium	04/05/20	4.6	0.5	0.5	ug/L	EPA 200.8	Alpha Analytical	
Influent	Copper	03/30/20	56	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Copper	03/31/20	72	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Copper	04/01/20	90	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Copper	04/02/20	200	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	

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Influent	Copper	04/03/20	100	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Copper	04/04/20	110	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	

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Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Influent	Copper	04/05/20	94	0.5	0.4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Cyanide (total)	03/30/20	6.1	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	03/31/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	04/01/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	04/02/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	04/03/20	< 2	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	04/04/20	3.7	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Cyanide (total)	04/05/20	2.3	5	2	ug/L	10-204-00-1-X	Alpha Analytical	
Influent	Lead	03/30/20	0.45	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	03/31/20	1.5	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	04/01/20	0.96	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	04/02/20	3.8	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	04/03/20	1.6	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	04/04/20	2.4	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Lead	04/05/20	1.2	0.25	0.06	ug/L	EPA 200.8	Alpha Analytical	
Influent	Mercury	03/30/20	0.05	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	03/31/20	0.065	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	04/01/20	0.073	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	04/02/20	0.16	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	04/03/20	0.16	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	04/04/20	0.099	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Mercury	04/05/20	0.1	0.02	0.02	ug/L	EPA 245.1	Alpha Analytical	
Influent	Molybdenum	03/30/20	1.2	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	03/31/20	1.7	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	04/01/20	2	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	04/02/20	3.6	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	04/03/20	2.2	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	04/04/20	2.7	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Molybdenum	04/05/20	1.8	0.25	0.07	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	03/30/20	3.8	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	03/31/20	4.7	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	04/01/20	5.1	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	04/02/20	11	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	04/03/20	6.1	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	04/04/20	9.3	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Nickel	04/05/20	5.3	0.5	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	03/30/20	0.59	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	03/31/20	0.65	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	04/01/20	0.8	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	04/02/20	1.8	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	04/03/20	1.1	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	04/04/20	1.2	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Selenium	04/05/20	1.1	0.4	0.3	ug/L	EPA 200.8	Alpha Analytical	
Influent	Silver	03/30/20	J 0.08	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Influent	Silver	03/31/20	0.16	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	

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Influent	Silver	04/01/20	0.24	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Influent	Silver	04/02/20	0.49	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	

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Sample Location	Constituent	Sample Date	Result	RL	MDL	Units	Analytical Method	Analytical Laboratory	Notes
Influent	Silver	04/03/20	0.3	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Influent	Silver	04/04/20	0.28	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Influent	Silver	04/05/20	0.23	0.1	0.05	ug/L	EPA 200.8	Alpha Analytical	
Influent	Sodium	03/30/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	03/31/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	04/01/20	140	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	04/02/20	160	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	04/03/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	04/04/20	170	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sodium	04/05/20	130	1	0.4	mg/L	EPA 200.7	Alpha Analytical	
Influent	Sulfate as SO4	03/30/20	49	10	4	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	03/31/20	50	25	10	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	04/01/20	62	50	20	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	04/02/20	53	25	10	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	04/03/20	49	10	4	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	04/04/20	56	25	10	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfate as SO4	04/05/20	50	10	4	mg/L	EPA 300.0	Alpha Analytical	
Influent	Sulfide	03/30/20	5.6	2.5	1.2	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	03/31/20	1.4	0.5	0.25	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	04/01/20	2.2	0.5	0.25	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	04/02/20	2.2	1	0.5	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	04/03/20	1.8	1	0.5	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	04/04/20	3	2.5	1.2	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Sulfide	04/05/20	1.6	0.5	0.25	mg/L	SM4500-S2 D	Alpha Analytical	
Influent	Total Dissolved Solids	03/30/20	750	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	03/31/20	880	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	04/01/20	910	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	04/02/20	1300	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	04/03/20	820	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	04/04/20	1000	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Total Dissolved Solids	04/05/20	900	10	10	mg/L	SM2540C	Alpha Analytical	
Influent	Zinc	03/30/20	66	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	03/31/20	120	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	04/01/20	230	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	04/02/20	480	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	04/03/20	230	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	04/04/20	250	5	4	ug/L	EPA 200.8	Alpha Analytical	
Influent	Zinc	04/05/20	170	5	4	ug/L	EPA 200.8	Alpha Analytical	

AHL Derivation Worksheets

Appendix D: AHL Calculations

1	Ammonia as N			
2	Formula/Source			
3	Calculations			
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	45	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	2,500	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	54	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	2,900	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	<0.1	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	<0.1	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	60	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	3,072	8.34*(D5-D7)*D14
16				
17	2020 Local Limits Monitoring			
18	99.9%			
19	SCRWRF Design Capacity	mg/L	-	-
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	0.49	NPDES Permit (Order No. R3-2017-0028)
21	NPDES Permit Weekly Average Discharge Limit	mg/L	-	-
22	NPDES Permit Monthly Average Discharge Limit	mg/L	0.25	NPDES Permit (Order No. R3-2017-0028)
23	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	-	-
24	Treatment Process Inhibition Limit	mg/L	480	USEPA Local Limits Guidance Manual
25	SCRWRF Design Capacity Loading Limit	lbs/day	-	-
26	NPDES Permit Daily Discharge Loading Limit	lbs/day	20,310	8.34*D6*D20/(1-D17)
27	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	-	-
28	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	10,362	8.34*D6*D22/(1-D17)
29	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	-	-
30	Limit	lbs/day	25,420	8.34*D5*D24/(1-0%)
31				
32	Headworks Limit	lbs/day	MIN(D26:D31)	
33				
34				
35	Safety Factor	10%	1,036	C36*D33
36	Industrial Allocation	lbs/day	6,254	D33-D15-D36
37	Calculated Uniform Local Limit	mg/L	3,571	D37/D7/8.34
38	Proposed Local Limit	mg/L	-	No local limit proposed

Appendix D: AHL Calculations

1	Biochemical Oxygen Demand (BOD)			
2	Formula/Source			
3	Calculations			
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	350	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	18,000	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	498	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	31,000	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	2.3	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	8	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	290	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	14,850	8.34*(I5-I7)*I14
16	2020 Local Limits Monitoring			
17	99.5%			
18	SCRWRF Design Capacity	mg/L	325	Plant Design Capacity
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	20	NPDES Permit (Order No. R3-2017-0028)
21	NPDES Permit Weekly Average Discharge Limit	mg/L	45	NPDES Permit (Order No. R3-2017-0028)
22	NPDES Permit Monthly Average Discharge Limit	mg/L	10	NPDES Permit (Order No. R3-2017-0028)
23	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	-	-
24	Treatment Process Inhibition Limit	mg/L	-	-
25	SCRWRF Design Capacity Loading Limit	lbs/day	17,212	8.34*I5*I19
27	NPDES Permit Daily Discharge Loading Limit	lbs/day	155,437	8.34*I6*I20/(1-I17)
28	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	349,733	8.34*I6*I21/(1-I17)
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	77,718	8.34*I6*I22/(1-I17)
30	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	-	-
31	Limit	lbs/day	-	-
32				
33	Headworks Limit	lbs/day	MIN(I26:I31)	
34				
35				
36	Safety Factor	7.5%	1,291	H36*I33
37	Industrial Allocation	lbs/day	1,071	I33-I15-I36
38	Uniform Local Limit	mg/L	611	I37/I7/8.34
39	Proposed Local Limit	mg/L	610	Calculated local limit

Appendix D: AHL Calculations

1	Chloride			
2	Formula/Source			
3	Calculations			
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	220	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	12,000	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	290	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	15,000	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	190	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	200	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	76	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	3,892	8.34*(N5-N7)*N14
16				
17	2020 Local Limits Monitoring			
18	17.5%			
19	SCRWRF Design Capacity	mg/L	-	-
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	-	-
21	NPDES Permit Weekly Average Discharge Limit	mg/L	-	-
22	NPDES Permit Monthly Average Discharge Limit	mg/L	250	NPDES Permit (Order No. R3-2017-0028)
23				
24	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	200	NPDES Permit (Order No. R3-2017-0028)
25	Treatment Process Inhibition Limit	mg/L	-	-
26	SCRWRF Design Capacity Loading Limit	lbs/day	-	-
27	NPDES Permit Daily Discharge Loading Limit	lbs/day	-	-
28	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	-	-
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	12,561	8.34*N6*N22/(1-N17)
30	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	10,048	8.34*N6*N23/(1-N17)
31		lbs/day	-	-
32				
33	Headworks Limit	lbs/day	MIN(N26:N31)	
34				
35				
36	Safety Factor	10%	1,005	M36*N33
37	Industrial Allocation	lbs/day	5,152	N33-N15-N36
38	Uniform Local Limit	mg/L	2,942	N37/N7/8.34
39	Proposed Local Limit	mg/L	2,900	Calculated local limit

Appendix D: AHL Calculations

1	S			T
	P			Formula/Source
2	Calculations			
3				
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRFF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRFF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	140	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	7,800	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	170	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	9,000	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	130	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	140	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	69	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	3,533	8.34*(S5-S7)*S14
16				
17				2020 Local Limits Monitoring
18	16.7%			
19	SCRWRFF Design Capacity	mg/L	-	-
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	-	-
21	NPDES Permit Weekly Average Discharge Limit	mg/L	-	-
22	NPDES Permit Monthly Average Discharge Limit	mg/L	200	NPDES Permit (Order No. R3-2017-0028)
23	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	175	NPDES Permit (Order No. R3-2017-0028)
24	Treatment Process Inhibition Limit	mg/L	-	-
25				
26	SCRWRFF Design Capacity Loading Limit	lbs/day	-	-
27	NPDES Permit Daily Discharge Loading Limit	lbs/day	-	-
28	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	-	-
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	9,948	8.34*S6*S22/(1-S17)
30	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	8,704	8.34*S6*S23/(1-S17)
31	Limit	lbs/day	-	-
32				
33	Headworks Limit	lbs/day	MIN(S26:S31)	
34				
35				
36	Safety Factor	10%	870	R36*S33
37	Industrial Allocation	lbs/day	4,301	S33-S15-S36
38	Uniform Local Limit	mg/L	2,456	S37/S7/8.34
39	Proposed Local Limit	mg/L	2,500	Calculated local limit

Appendix D: AHL Calculations

1	X			Y
2	W			Formula/Source
3	Calculations			
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRFF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRFF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	940	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	52,000	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	1300	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	69,000	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	670	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	710	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	650	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	33,285	8.34*(X5-X7)*X14
16				
17				2020 Local Limits Monitoring
18	32.7%			
19	SCRWRFF Design Capacity	mg/L	-	-
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	-	-
21	NPDES Permit Weekly Average Discharge Limit	mg/L	-	-
22	NPDES Permit Monthly Average Discharge Limit	mg/L	1,000	NPDES Permit (Order No. R3-2017-0028)
23	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	900	NPDES Permit (Order No. R3-2017-0028)
24	Treatment Process Inhibition Limit	mg/L	-	-
25				
26	SCRWRFF Design Capacity Loading Limit	lbs/day	-	-
27	NPDES Permit Daily Discharge Loading Limit	lbs/day	-	-
28	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	-	-
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	61,583	8.34*X6*X22/(1-X17)
30	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	55,424	8.34*X6*X23/(1-X17)
31		lbs/day	-	-
32				
33	Headworks Limit	lbs/day	MIN(X26:X31)	
34				
35				
36	Safety Factor	10%	5,542	W36*X33
37	Industrial Allocation	lbs/day	16,597	X33-X15-X36
38	Uniform Local Limit	mg/L	9,476	X37/X7/8.34
39	Proposed Local Limit	mg/L	9,500	Calculated local limit

Appendix D: AHL Calculations

1	Total Suspended Solids (TSS)			
2	Formula/Source			
3	Calculations			
4	Average Dry Weather Design Capacity	mgd	8.5	Average Dry Weather Design Capacity
5	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow
6	Average SCRWRF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow
7	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report
8	Average Influent Concentration	mg/L	310	2020 Local Limits Monitoring
9	Average Influent Loading	lbs/day	16,000	2020 Local Limits Monitoring
10	Maximum Influent Concentration	mg/L	584	2020 Local Limits Monitoring
11	Maximum Influent Loading	lbs/day	32,000	2020 Local Limits Monitoring
12	Average Final Effluent Concentration	mg/L	2.1	2020 Local Limits Monitoring
13	Maximum Final Effluent Concentration	mg/L	4.8	2020 Local Limits Monitoring
14	Average Non-Industrial Concentration	mg/L	200	2020 Local Limits Monitoring
15	Average Non-Industrial Loading	lbs/day	10,242	8.34*(AC5-AC7)*AC14
16				
17	2020 Local Limits Monitoring			
18	99.5%			
19	SCRWRF Design Capacity	mg/L	295	Plant Design Capacity
20	NPDES Permit Maximum Daily Discharge Limit	mg/L	20	NPDES Permit (Order No. R3-2017-0028)
21	NPDES Permit Weekly Average Discharge Limit	mg/L	45	NPDES Permit (Order No. R3-2017-0028)
22	NPDES Permit Monthly Average Discharge Limit	mg/L	10	NPDES Permit (Order No. R3-2017-0028)
23				
24	NPDES Permit 12-Month Moving Average Discharge Limit	mg/L	-	-
25	Treatment Process Inhibition Limit	mg/L	-	-
26	SCRWRF Design Capacity Loading Limit	lbs/day	15,623	8.34*AC5*AC19
27	NPDES Permit Daily Discharge Loading Limit	lbs/day	152,459	8.34*AC6*AC20/(1-AC17)
28	NPDES Permit Weekly Average Discharge Loading Limit	lbs/day	343,033	8.34*AC6*AC21/(1-AC17)
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	76,230	8.34*AC6*AC22/(1-AC17)
30	NPDES Permit 12-Month Moving Average Discharge Loading Limit	lbs/day	-	-
31	Limit	lbs/day	-	-
32				
33	Headworks Limit	lbs/day	MIN(AC26:AC31)	
34				
35				
36	Safety Factor	10%	1,562	AB36*AC33
37	Industrial Allocation	lbs/day	3,819	AC33-AC15-AC36
38	Uniform Local Limit	mg/L	2,181	AC37/AC7/8.34
39	Proposed Local Limit	mg/L	1,000	Maintain existing local limit

Appendix D: AHL Calculations

1	Arsenic				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Effluent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	1.6	Report	
8	Average Influent Loading	lbs/day	0.086	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	2.7	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.14	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	1.1	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	1.4	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	31.4%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	41	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	500	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	1.8	0.000001*D18*D25/D16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	147	0.000001*D18*D26/D19/D16	
33					
34	Limiting MAHL	lbs/day		MIN(D28:D32)	
35	Basis of MAHL		1.8		
36					
37	Safety Factor	10%	0.18	C37*D34	
38	Industrial Allocation	lbs/day	1.5	D34-D14-D37	
39	Uniform Local Limit	ug/L	878	D38/D6/0.00834	
40	Proposed Local Limit	mg/L	0.88	Calculated local limit	

Appendix D: AHL Calculations

1	Cadmium				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	0.21	Report	
8	Average Influent Loading	lbs/day	0.012	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	0.46	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.025	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	<0.06	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	0.35	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	88.3%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	39	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	100	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	0.60	0.000001*118*125/116	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	10	0.000001*118*126/119/116	
33					
34	Limiting MAHL	lbs/day	MIN(128:132)		
35	Basis of MAHL		0.60		
36					
37	Safety Factor	10%	0.060	H37*134	
	Industrial Allocation	lbs/day	0.53	I34-I14-I37	
39	Uniform Local Limit	ug/L	301	I38/I6/0.00834	
40	Proposed Local Limit	mg/L	0.01	Maintain existing local	

Appendix D: AHL Calculations

1	Chromium				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	6.6	Report	
8	Average Influent Loading	lbs/day	0.36	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	12	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.63	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.45	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	3.5	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	92.8%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	-	-	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	500	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	-	-	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	50	0.000001*N18*N26/N19/N16	
33					
34	Limiting MAHL	lbs/day		MIN(N28:N32)	
35	Basis of MAHL		50		
36					
37	Safety Factor	10%	5.0	M37*N34	
38	Industrial Allocation	lbs/day	45	N34-N14-N37	
39	Uniform Local Limit	ug/L	25,533	N38/N6/0.00834	
40	Proposed Local Limit	mg/L	5.1	Maintain existing local	

Appendix D: AHL Calculations

1	Copper				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	100	Report	
8	Average Influent Loading	lbs/day	5.7	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	200	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	11	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	3.6	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	71	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	96.7%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	42	NPDES Permit (Order No. R3-2017-0028)	
23	NPDES Permit Monthly Average Discharge	ug/L	20		
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	1,500	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	2,500	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	52	0.00834*S5*S22/(1-S16)	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	25	0.00834*S5*S23/(1-S16)	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	21	0.000001*S18*S25/S16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	239	0.000001*S18*S26/S19/S16	
33					
34	Limiting MAHL	lbs/day		MIN(S28:S32)	
35	Basis of MAHL		21		
36					
37	Safety Factor	10%	2.1	R37*S34	
38	Industrial Allocation	lbs/day	15	S34-S14-S37	
39	Uniform Local Limit	ug/L	8,848	S38/S6/0.00834	
40	Proposed Local Limit	mg/L	1.8	Maintain existing local	

Appendix D: AHL Calculations

1	Lead				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow	
5	Average SCRWRF Influent Flow	mgd	4.97		
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report	
7	Average Influent Concentration	ug/L	1.7		
8	Average Influent Loading	lbs/day	0.093	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	3.8	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.20	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.15	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	1.5	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	91.7%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	4.2	NPDES Permit (Order No. R3-2017-0028)	
23	NPDES Permit Monthly Average Discharge	ug/L	2.1		
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	300	40 CFR Part 503 CCR Title 22	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	1,000		
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	2.1	0.00834*X5*X22/(1-X16)	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	1.1	0.00834*X5*X23/(1-X16)	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	4.5	0.000001*X18*X25/X16	
32	Limit	lbs/day	101	0.000001*X18*X26/X19/X16	
33	Biosolids CCR Title 22 Loading Limit				
34	Limiting MAHL	lbs/day		MIN(X28:X32)	
35	Basis of MAHL		1.1		
36					
37	Safety Factor	10%	0.11	W37*X34	
38	Industrial Allocation	lbs/day	0.87	X34-X14-X37	
39	Uniform Local Limit	ug/L	496	X38/X6/0.00834	
40	Proposed Local Limit	mg/L	0.5	Calculated local limit	

Appendix D: AHL Calculations

1	Mercury				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	0.1	Report	
8	Average Influent Loading	lbs/day	0.0056	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	0.16	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.0085	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.00063	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	0.06	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	99.4%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	17	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	20	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	0.23	0.000001*AC18*AC25/AC16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	1.9	0.000001*AC18*AC26/AC19/AC16	
33					
34	Limiting MAHL	lbs/day	MIN(AC28:AC32)		
35	Basis of MAHL		0.23		
36					
37	Safety Factor Industrial Allocation	10% lbs/day	0.023 0.21	AB37*AC34 AC34-AC14-AC37	
39	Uniform Local Limit	ug/L	119	AC38/AC6/0.00834	
40	Proposed Local Limit	mg/L	0.03	Maintain existing local	

Appendix D: AHL Calculations

1	Molybdenum				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	2.2	Report	
8	Average Influent Loading	lbs/day	0.12	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	3.6	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.19	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.78	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	2.1	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	66.7%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	75	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	3,500	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	1.5	0.000001*AH18*AH25/AH16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	486	0.000001*AH18*AH26/AH19/AH16	
33					
34	Limiting MAHL	lbs/day		MIN(AH28:AH32)	
35	Basis of MAHL		1.5		
36					
37	Safety Factor	10%	0.15	AG37*AH34	
38	Industrial Allocation	lbs/day	1.3	AH34-AH14-AH37	
39	Uniform Local Limit	ug/L	731	AH38/AH6/0.00834	
40	Proposed Local Limit	mg/L	-	No local limit proposed	

Appendix D: AHL Calculations

1	Nickel				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	6.5	Report	
8	Average Influent Loading	lbs/day	0.36	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	11	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.59	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	2.4	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	5.3	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	63.9%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	420	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	2,000	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	9.0	0.000001*AM18*AM25/AM16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	290	0.000001*AM18*AM26/AM19/AM16	
33					
34	Limiting MAHL	lbs/day	MIN(AM28:AM32)		
35	Basis of MAHL		9.0		
36					
37	Safety Factor Industrial Allocation	10% lbs/day	0.90 7.8	AL37*AM34 AM34-AM14-AM37	
39	Uniform Local Limit	ug/L	4,473	AM38/AM6/0.00834	
40	Proposed Local Limit	mg/L	2.7	Maintain existing local	

Appendix D: AHL Calculations

1	Selenium				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	1	Report	
8	Average Influent Loading	lbs/day	0.057	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	1.8	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.096	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.15	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	1.1	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	85.0%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	100	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	100	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	1.6	0.000001*AR18*AR25/AR16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	11	0.000001*AR18*AR26/AR19/AR16	
33					
34	Limiting MAHL	lbs/day		MIN(AR28:AR32)	
35	Basis of MAHL		1.6		
36					
37	Safety Factor	10%	0.16	AQ37*AR34	
38	Industrial Allocation	lbs/day	1.4	AR34-AR14-AR37	
39	Uniform Local Limit	ug/L	796	AR38/AR6/0.00834	
40	Proposed Local Limit	mg/L	-	No local limit proposed	

Appendix D: AHL Calculations

1	Silver				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	0.25	Report	
8	Average Influent Loading	lbs/day	0.014	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	0.49	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.026	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	0.025	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	0.2	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	90.0%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	-	-	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	500	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	-	-	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	51	0.000001*AW18*AW26/AW19/AW16	
33					
34	Limiting MAHL	lbs/day	MIN(AW28:AW32)		
35	Basis of MAHL		51		
36					
37	Safety Factor Industrial Allocation	10% lbs/day	5.1 46	AV37*AW34 AW34-AW14-AW37	
39	Uniform Local Limit	ug/L	26,421	AW38/AW6/0.00834	
40	Proposed Local Limit	mg/L	4.2	Maintain existing local	

Appendix D: AHL Calculations

1	Zinc				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020	Average Daily
5	Average SCRWRF Influent Flow	mgd	4.97	Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment	
7	Average Influent Concentration	ug/L	220	Report	
8	Average Influent Loading	lbs/day	12	2020 Local Limits Monitoring	
9	Maximum Influent	ug/L	480	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	26	2020 Local Limits Monitoring	
11	Average Final Effluent	ug/L	70	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial	ug/L	200	2020 Local Limits Monitoring	
14					
15					
16	2020 Local Limits Monitoring				
17	70.0%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20					
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	2,800	40 CFR Part 503	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	5,000	CCR Title 22	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	55	0.000001*BB18*BB25/BB16	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	661	0.000001*BB18*BB26/BB19/BB16	
33					
34	Limiting MAHL	lbs/day		MIN(BB28:BB32)	
35	Basis of MAHL		16		
36					
37	Safety Factor	10%	1.6	BA37*BB34	
38	Industrial Allocation	lbs/day	4.1	BB34-BB14-BB37	
39	Uniform Local Limit	ug/L	2,317	BB38/BB6/0.00834	
40	Proposed Local Limit	mg/L	1.4	Maintain existing local	

Appendix D: AHL Calculations

1	Cyanide				
2	Formula/Source				
3	Calculations				
4	Average SCRWRF Influent Flow	mgd	6.35	May 2017-April 2020 Average Daily Flow	
5	Average SCRWRF Effluent Flow	mgd	4.97	May 2017-April 2020 Average Daily Flow	
6	Average Industrial Flow	mgd	0.21	2019 Annual Pretreatment Report	
7	Average Influent Concentration	ug/L	2.1	2020 Local Limits Monitoring	
8	Average Influent Loading	lbs/day	0.13	2020 Local Limits Monitoring	
9	Maximum Influent Concentration	ug/L	6.1	2020 Local Limits Monitoring	
10	Maximum Influent Loading	lbs/day	0.33	2020 Local Limits Monitoring	
11	Average Final Effluent Concentration	ug/L	2.5	2020 Local Limits Monitoring	
12					
13	Average Non-Industrial Concentration	ug/L	2.1	2020 Local Limits Monitoring	
14	Average Non-Industrial Loading	lbs/day	0.11	0.00834*(D4-D6)*D13	
15					
16	2020 Local Limits Monitoring				
17	-23.1%				
18					
19	Percent Solids of Biosolids	%	14.8%	2019 Annual Biosolids Report	
20	Average Biosolids Concentration, Dry	mg/kg	<2	2019 Annual Biosolids Report	
21					
22	NPDES Permit Maximum Daily Discharge Limit	ug/L	-	-	
23	NPDES Permit Monthly Average Discharge Limit	ug/L	-	-	
24					
25	Biosolids 40 CFR Part 503 Disposal Limit, Dry	mg/kg	-	-	
26	Biosolids CCR Title 22 Disposal Limit, Wet	mg/kg	-	-	
27					
28	NPDES Permit Maximum Daily Discharge Loading Limit	lbs/day	-	-	
29	NPDES Permit Monthly Average Discharge Loading Limit	lbs/day	-	-	
30					
31	Biosolids 40 CFR Part 503 Loading Limit	lbs/day	-	-	
32	Biosolids CCR Title 22 Loading Limit	lbs/day	-	-	
33					
34	Limiting MAHL	lbs/day	MIN(D28:D32)		
35	Basis of MAHL	5.3			
36					
Safety Factor		10%	0.53	C37*D34	
Industrial Allocation		lbs/day	4.7	D34-D14-D37	
39	Uniform Local Limit	ug/L	2,660	D38/D6/0.00834	
40	Proposed Local Limit	ma/L	1.8	Maintain existing local limit	

AHL Documentation/Assumptions

This appendix lists the source of data and assumptions used in the derivation of the South County Regional Wastewater and Reclamation Facility (SCRWRF) maximum allowable headworks loadings (MAHL), maximum allowable industrial loadings (MAIL), and local limits for pollutants of concern. Variations from these data sources and assumptions are noted on a pollutant-by-pollutant basis.

For All Pollutants

- The May 2017 to April 2020 average daily influent flow was 6.35 million gallons per day (mgd).
- The May 2017 to April 2020 average daily effluent flow was 4.97 mgd.
- From the 2019 Annual Pretreatment Report, the average daily industrial user flow was 0.21 mgd.
- In 2019, approximately 13,700 pounds per day (lb/day dry weight) of biosolids were generated and composted at Dos Palos.
- Regression on order statistics (ROS) was used to estimate average pollutant concentrations and loads if there are sufficient detected data. If there were insufficient detected data to estimate the average using ROS, then the one-half of the method detection limit was used for concentrations that are non-detect. The average was then calculated based on the estimate of the one-half of the method detection limit (MDL).
- Although the SCRWRF does not have activated sludge treatment, the activated sludge inhibition levels from the 2004 Local Limits Guidance were used in the development of the local limits to consider biological inhibition in the oxidation ponds. The activated sludge inhibition levels used in this study are presented in Appendix B.
- Biosolids disposal limits from Title 40 of the Code of Federal Regulations (40 CFR) Part 503 were used, and presented in Appendix B.
- Biosolids disposal limits from Title 22 of the California Code of Regulations (CCR Title 22) were used, and presented in Appendix B.
- Effluent limitations were from the SCRWA National Pollutant Discharge Elimination System (NPDES) permit (CA0049964, Order No. R3-2017-0028), which was adopted by the Central Coast Regional Water Quality Control Board in September 2017. These effluent limitations are presented in Appendix B.
- Local limits sampling was conducted for the collection system, SCRWRF influent, and SCRWRF final effluent in March and April 2020. Local limits sampling data were supplemented by historical data collected between May 2017 and April 2020.
- Biosolids disposal data were from regular biosolids monitoring in 2019.
- Unless otherwise stated, a 10 percent safety factor was used in calculating all MAILs.

Conventional Pollutants

There were no pollutant-specific deviations from the assumptions discussed above for chloride, sodium, and total dissolved solids (TDS). For ammonia as N, biochemical oxygen demand (BOD), and total suspended solids (TSS), see the following sections.

Ammonia as N

- The NPDES permit effluent limitation for ammonia is as unionized ammonia, which is a fraction of total ammonia. The *Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater 2013* (EPA 822-R-18-022) was used to convert the unionized ammonia effluent limitation to a total ammonia effluent limitation based on the following equations:

$$\begin{aligned} &= 0.09018 + \frac{2729.92}{273.2 + \frac{1}{1 + 10^{-\text{pH} - 9.25}}} \\ &= \frac{1}{3} \end{aligned}$$

- The pH was assumed to be 8.3 standard units, which is the maximum pH effluent limitation in the NPDES permit. The temperature was assumed to be 25 degrees Centigrade. This calculation resulted in average monthly and maximum daily effluent limitations for total ammonia of 0.25 and 0.49 mg/L as N, respectively.

Biochemical Oxygen Demand (BOD)

- The SCRWRF design capacity for BOD was 325 mg/L.
- Because multiple safety factors were used in the design of the SCRWRF to protect it from upset and inhibition, a safety factor of 7.5% was used for BOD in the development of the MAIL and the local limit.

Total Suspended Solids (TSS)

- The SCRWRF design capacity for TSS was 295 mg/L.

Metals (Total Recoverable)

There were no pollutant-specific deviations from the assumptions discussed above for arsenic, cadmium, chromium, lead, mercury, molybdenum, nickel, selenium, silver, or zinc.

For copper, the effluent equipment blank result, collected on March 31, 2020, was 0.65 µg/L. Effluent sample results for copper collected on April 3, April 3, and April 5, 2020 were qualified as non-detect at the reported result due to the blank sample contamination.

Other Toxics

There were no pollutant-specific deviations from the assumptions discussed above for cyanide.



**SOUTH COUNTY REGIONAL
WASTEWATER AUTHORITY**

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DATE: January 3, 2024

TO: Honorable Chairman Spring and Members of the Board

FROM: Jimmy Forbis, SCRWA General Manager
Harjot Sangha, SCRWA Treasurer

SUBJECT: Re-Adoption of the SCRWA Investment Policy and Delegation of Authority to the SCRWA Treasurer to Conduct Investment Activities

Recommendations:

1. Delegation of the authority to invest or to reinvest funds, or to sell or exchange securities so purchased to the SCRWA Treasurer; and
2. Re-adopt the Investment Policy.

Discussion:

Pursuant to the SCRWA investment policy, the SCRWA Board is required to annually; 1) renew the delegation of authority to invest or to reinvest funds or to sell or exchange securities so purchased, to the SCRWA Treasurer; and 2) review and adopt the written investment policy at a public meeting to ensure its consistency with respect to the overall objectives of safety, liquidity, and yield.

The Board currently receives quarterly investment reports prepared and presented by the SCRWA Treasurer. The current funds on hand, which primarily consist of SCRWA reserves, are invested with the Local Agency Investment Fund (LAIF), which is part of the Pooled Money Investment Account (PMIA) with 2352 participants and \$20.8 billion in assets at the end of November 2023. For FY 2022-23 the average annual yield was 2.17%. Operational and capital cash flow is provided by both member cities, via monthly or quarterly billings, and an annual true-up at fiscal year-end. As such, there typically is very little to no operational idle cash available for investment purposes.

Currently, staff recommends the following minor changes to the investment policy:

- Investment Standard – Updated to remove references to the “Prudent Man Rule” and maintains the Prudent Investor Standard as the primary prudence as required per the California Government Code.
- Delegation of Authority – This section currently provides for the SCRWA Board to delegate the authority to the SCRWA Treasurer for a one-year period. Given that SCRWA

Board has transitioned to meeting on a quarterly basis, and to ensure continued compliance with the investment policy year-round, as is the current practice, it is recommended the

delegation be made until revoked. The investment policy is still required to be reviewed and adopted annually by the SCRWA Board.

Fiscal Impact:

There is no fiscal impact to adopting the Investment Policy.

Attachments:

1. SCRWA Investment Policy – January 2024 Update - Redlined

Attachment 1

SCRWA Investment Policy

INVESTMENT POLICY
for
SOUTH COUNTY REGIONAL
WASTEWATER AUTHORITY

Re-Adopted: ~~June 2021~~January 2024

I. **STATEMENT OF OBJECTIVES**

Temporarily idle or surplus funds of the South County Regional Wastewater Authority (SCRWA) shall be invested in accordance with principles of sound treasury management and in accordance with the provisions of California Government Code Sections 53600, et seq., the Municipal Code, guidelines established by the California Municipal Treasurer's Association and the California Society of Municipal Finance Officers, and this Investment Policy ("Policy").

A. **Overall Risk Profile**

The three basic objectives of SCRWA's Investment Program are, in order of priority:

1. Safety of invested funds;
2. Maintenance of sufficient liquidity to meet cash flow needs of the Authority; and
3. Attainment of the maximum yield possible consistent with the first two objectives.

The achievement of these objectives shall be accomplished in the manner described below:

1. **Safety of Invested Funds**

The Authority shall ensure the safety of its invested idle funds by limiting credit and interest rate risks. Credit risk is the risk of loss due to the failure of the security issuer or backer. Interest rate risk is the risk that the market value portfolio securities will fall due to an increase in general interest rates.

a. Credit risk will be mitigated by:

- i. Limiting investments to the safest types of securities as outlined in this policy;
- ii. By prequalifying the financial institutions with which it will do business; and
- iii. By diversifying the investment portfolio so that the failure of any one issuer or backer will not place an undue financial burden on the Authority.

b. Interest rate risk will be mitigated by:

- i. Maintaining adequate sums in 30 day or less funds.
- ii. Structuring SCRWA's portfolio so that securities mature to meet the

- Authority's cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to their maturation to meet those specific needs; and
- iii. Investing primarily in shorter term securities (five years or less).

- c. The physical security or safekeeping of SCRWA's investments is also an important element of safety. Detailed safekeeping requirements are defined in Section III of this Policy.

2. **Liquidity**

SCRWA's investment portfolio shall be structured in a manner which strives to achieve that securities mature at the same time as cash is needed to meet anticipated demands (static liquidity). Additionally, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). The specific percentage mix of different investment instruments and maturities is described in Section II of this Policy.

3. **Yield**

Yield on SCRWA's investment portfolio is of secondary importance compared to the safety and liquidity objectives described above. Investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. While it may occasionally be necessary or strategically prudent of the Authority to sell a security prior to maturity to either meet unanticipated cash needs or to restructure the portfolio, this Policy specifically prohibits trading securities for the sole purpose of speculating on the future direction of interest rates.

B. **Time Frame for Investment Decisions**

SCRWA's investment portfolio shall be structured to provide that sufficient funds from investments are available every month to meet the Authority's anticipated cash needs. Subject to the safety provisions outlined above, the choice in investment instruments and maturities shall be based upon an analysis of anticipated cash needs, existing and anticipated revenues, interest rate trends, and specific market opportunities. No investment should have a maturity of more than five (5) years from its date of purchase without receiving SCRWA Board approval within the prior 90 days.

C. **Definition of Idle or Surplus Funds**

Idle or surplus funds for the purpose of this Policy are all SCRWA funds which are available for investment at any one time, including the estimated checking account float, excepting those minimum balances required by SCRWA's banks to compensate them for the cost of banking services.

D. Applicability of Policy

This policy does not apply to:

1. Monies held by a trustee or fiscal agent and pledged to the payment or security of bonds or other indebtedness, or obligations under agreements, of a local agency, or certificates of participation in such bonds, indebtedness or agreements, the investment of which may be in accordance with the statutory provisions governing the issuance of those bonds, indebtedness or agreements, or to the extent not inconsistent therewith, or if there are no specific statutory provisions, in accordance with the ordinance, resolution, indenture or agreement of the local agency providing for the issuance.

II. INVESTMENTS

This section of the Investment Policy identifies policies, types of investments, and related matters pertaining to instruments in which the Authority will invest its idle funds.

A. Investment Standards

SCRWA operates its temporary pooled idle cash investments under [the Prudent Man Rule, California Probate Code Section 16040\(b\)](#)², the Prudent Investor Standard, California Government Code, Section 53600.3³, and with additional guidance from the provisions of the Uniform Prudent Investor Act, California Probate Code Section 16045, et seq⁴. This affords the Authority a broad spectrum of investment opportunities as long as the investment is deemed prudent and is allowable under current legislation of the State of California (Government Code Section 53600, et seq).

B. Eligible Securities

²[The Prudent Man Rule states, in essence, that "in investing . . . property for the benefit of another, a trustee shall exercise the judgment and care, under the circumstances then prevailing, which men of prudence, discretion, and intelligence exercise in the management of their own affairs . . ."](#)

³Governing bodies of local agencies (e.g., a City Council) or persons authorized to make investment decisions on behalf of those local agencies investing public funds pursuant to this chapter are trustees and therefore fiduciaries subject to the prudent investor standard. When investing, reinvesting, purchasing, acquiring, exchanging, selling, and managing public funds, a trustee shall act with care, skill, prudence, and diligence under the circumstances then prevailing, including, but not limited to, the general economic conditions and the anticipated needs of the agency, that a prudent person acting in a like capacity and familiarity with those matters would use in the conduct of funds of a like character and with like aims, to safeguard the principal and maintain the liquidity needs of the agency. Within the limitations of this section and considering individual investments as part to an overall strategy, a trustee is authorized to acquire investments as authorized by law.

⁴The standard of care for trustees investing and managing trust assets is the Prudent Investor Standard and takes into consideration the purposes, terms, distribution requirements and other circumstances of the trust, and in satisfying this standard, the trustee is required to exercise reasonable care, skill, and caution in light of the facts and circumstances existing at the time of a trustee's decision or action.

Subject to the Prudent Man Rule, the Prudent Investor Standard and other applicable laws and regulations, this policy permits investment in the following:

1. Insured Certificates of Deposit (CD's) of California banks and/or savings and loan associations, and/or savings banks (with an AAA ratinga Superior or Excellent ranking of 165 or more as provided by The Financial Directory Publishing Inc. or similar rating publication) which mature in five (5) years or less, provided that the Authority's investments shall not exceed Two Hundred Fifty Thousand Dollars (\$250,000.00) per institution. If the investment exceeds the insured \$250,000.00, the funds are to be collateralized at 110% of the deposit in government securities or 150% in mortgages. *(limited to 5% of the portfolio)*
2. Local Agency Investment Fund (State Pool) Demand Deposits
3. Securities of the U.S. Government, or its agencies
4. Passbook Savings or Money Market Demand Deposits

C. Investments Deemed Not Appropriate at this Time

The SCRWA Investment Policy does not permit investment in the following instruments or securities:

1. Corporate bonds or stocks
2. Repurchase agreements or reverse repurchase agreements
3. Interest only or principal only strips
4. Certificates of Deposit issued by institutions not operating within California
5. Inverse floaters and range notes
6. Financial futures or financial option contracts
7. Securities lending or leveraging any portion of the portfolio

D. Collateralization Requirements

Uninsured Time Deposits with banks and savings and loans shall be collateralized in the manner prescribed by law for depositories accepting municipal investment funds.

E. Preformatted Wire Transfers

Wherever possible, the Authority will use preformatted wire transfers to restrict the transfer of funds to preauthorized accounts only. When transferring funds to an account not previously approved, the bank is required to call back a second employee for confirmation that the transfer is authorized.

F. Qualification of Brokers, Dealers and Financial Institutions

The SCRWA Treasurer shall investigate brokers and dealers who wish to do business with the Authority to determine if they are adequately capitalized, have any pending legal actions against the firm or the individual broker, and that they market securities appropriate to the Authority's needs.

The Authority shall annually send a copy of the current edition of the Policy to all institutions and broker/dealers which are approved to handle SCRWA investments. Receipt of the Policy, including confirmation that it has been received by persons handling SCRWA's accounts, shall be acknowledged in writing within thirty (30) days.

G. Diversification

The portfolio should consist of a prudent mix of various types of securities, issues and maturities.

H. Confirmation

Receipts for confirmation of purchase or sale of authorized securities should be received by the SCRWA Treasurer within five (5) days and include the following information: trade date, par value, rate, price, yield, settlement date, description of securities purchased, agency's name, net amount due, third party custodial information. These are minimum information requirements.

I. Internal Controls

Investment duties shall be separated by having at least three persons perform the following functions for any particular investment: the recordation of investments and disbursements, confirmation receipts, the preparation of Treasurer's reports, wire transfers, bank reconciliations and treasury reconciliations. An independent analysis by the external auditor shall be conducted annually to screen internal control, account activity, including verification of all securities, and compliance with policies and procedures.

J. Interest Earnings

All interest earned on investments authorized by this Policy shall be allocated quarterly.

III. SAFEKEEPING OF SECURITIES

A. Safekeeping Agreement

The Authority shall contract with a bank or banks with federally insured deposits for the safekeeping services through a third party custodial agreement, (California Government Code Section 53601)⁵ which includes delivery versus payment provisions, for securities which are owned by SCRWA as part of its investment portfolio.

B. Handling of Securities and Time Deposit Collateral

All securities owned by SCRWA shall be held by the Authority or by its third party custodian, except the collateral for time deposits in banks, savings banks, and savings and loan associations. The collateral for time deposits in banks and savings and loans shall be held in a trust account in SCRWA's name. Dealers or brokers shall not hold any securities for SCRWA. A broker is not an approved depository under California Government Code Section 53630⁶ and Section 53608⁷

⁵Section 53601. Authorized Investments, circumstances. A local agency purchasing or obtaining any security . . . shall require delivery of the securities to the local agency . . . by book entry, physical delivery or by third party custodial agreement.

⁶Section 53630(c) allows state or national banks, state or federal savings banks or savings and loan associations, state or federal credit unions and federally insured industrial loan companies as approved depositories.

⁷Section 53608. Deposit of securities; delegation of authority. The legislative body of a local agency may deposit for safekeeping with a federal or state association, a trust company or a state or national bank located within this state or with the Federal Reserve Bank of San Francisco or any branch thereof within this state, or with any Federal Reserve Bank or with any state or national bank located in any city designated as a reserve city by the Board of Governors of the Federal Reserve System, the bonds, notes, bills, debentures, obligations, certificates or indebtedness, warrants, or other evidences of indebtedness in which the money of the local agency is invested pursuant to this article or pursuant to other legislative authority. The local agency shall take from such financial institution a receipt for securities so deposited. The authority of the legislative body to deposit for safekeeping may be delegated by the legislative body to the treasurer of the local agency; the treasurer shall not be responsible for securities delivered to and receipted for by a financial institution until they are withdrawn from the financial institution by the treasurer.

C. Security Transfers

The authorization to release SCRWA's securities will be telephoned to the appropriate depository or custodian by a Finance Department member other than the person who initiated the transaction. A written confirmation outlining the details for the transaction and confirming the telephone instructions will be sent to the bank within five (5) working days. A confirming notice documenting the transaction will be sent by the bank to SCRWA within five (5) working days of the transaction.

D. Verification of Security

Securities held by an agent of depository as collateral securing time deposits will be verified in writing during the year by SCRWA's independent auditors as part of SCRWA's annual independent audit. SCRWA's independent auditors confirm the collateral directly with the bank holding that collateral. Those securities held by that depository or custodian as collateral are subject to audit by the bank's auditors.

IV. STRUCTURE AND RESPONSIBILITY

This section of the Policy defines the overall structure of the investment management program.

A. Responsibilities of the Finance Department

The SCRWA Treasurer, officers and representatives are charged with responsibility for maintaining custody of all public funds and securities belonging to or under the control of the Authority and for the deposit and investment of those funds in accordance with principles of sound treasury management and in accordance with applicable laws and ordinances.

B. Responsibilities and Ethics of the SCRWA Treasurer

1. Delegation of Authority

The authority to manage SCRWA's investment program is derived from the California Government Code Section 53600, et seq, The SCRWA Board is responsible for the management of SCRWA funds, including the administration of this investment policy. The authority of SCRWA Board to invest or to reinvest funds, or to sell or exchange securities so purchased, may beis hereby delegated for a one-year period to the SCRWA Treasurer, who shall thereafter assume full responsibility for those transactions until the delegation is revoked or expires and shall make quarterly reports of those transactions to the SCRWA Board (California Government Code Section 53607). Subject to review, the SCRWA Board may renew the delegation of authority each year.

2. Responsibilities

The SCRWA Treasurer is charged with the responsibility for the purchase, sale, custody and investment of SCRWA funds, and the development of procedures to implement this Investment Policy. In fulfilling responsibilities, the SCRWA Treasurer is subject to the Prudent Investor Standard and shall render reports regarding compliance with the Investment Policy. The SCRWA Treasurer is further responsible for the duties and subject to the powers imposed by and applicable to Authority Treasurers under the general laws of the State of California.

3. Ethical Conduct

The SCRWA Treasurer will demonstrate integrity in all public and personal relationships, protect the public trust, and seek no favor or accept any personal gain which would influence or appear to influence the conduct of the office of Treasurer.

C. **Responsibilities of the Executive Director**

The Executive Director is responsible for directing and supervising the SCRWA Treasurer. They are responsible further to keep the SCRWA Board fully advised as to the financial condition of SCRWA and its compliance with this Policy.

D. **Responsibilities of the SCRWA Board**

The SCRWA Board shall consider and annually adopt a written investment policy. As provided in that policy, the Board shall receive and review quarterly investment reports and may annually delegate investment authority to the SCRWA Treasurer pursuant to California Government Code Section 53607.

V. **REPORTING**

The SCRWA Treasurer shall prepare a quarterly investment report, including a succinct management summary that provides a clear picture of the status of the current investment portfolio and transactions made over the past quarter by month. This management summary will be prepared in a manner which will allow the Executive Director and SCRWA Board to ascertain whether investment activities during the reporting period are in conformance with SCRWA's Investment Policy.

The quarterly investment report will include the following:

A. A listing of individual securities held at the end of the reporting quarter showing the:

1. type of investment
2. institution
3. date of maturity
4. amount of deposit or cost of the security
5. rate of return

- B. Unrealized gain or loss resulting from appreciation or depreciation by listing the cost and market value of securities over one year in duration.
- C. Average yield of return on SCRWA's investments.
- D. Maturity aging for the investments.
- E. Compliance of the investment portfolio with the Investment Policy.
- F. A statement denoting the ability of the Authority to meet expenditure requirements for the next six months.

VI. **REVIEW OF INVESTMENT MANAGEMENT**

A. **Statement of Policy**

As set forth in California Code Section 53646(a), the Executive Director shall annually render to the SCRWA Board a statement of investment policy, which shall be considered by the Board at a public meeting.

B. **Policy Review**

This Investment Policy shall be reviewed annually by the SCRWA Board at a public meeting in accordance with state law to ensure its consistency with respect to the overall objectives of safety, liquidity, and yield. Proposed amendments to the Policy shall be prepared by the SCRWA Treasurer and shall be forwarded to the SCRWA Board for consideration at a public meeting. Any recommended modifications or amendments shall be presented to the SCRWA Board for consideration and adoption.

VII. **AUTHORITY**

This Policy was originally duly adopted by authority of the SCRWA Board on the 6th day of May 2015 and was most recently re-adopted on January 3, 2024..

**SOUTH COUNTY REGIONAL WASTEWATER AUTHORITY
CASH AND INVESTMENTS REPORT
AS OF 9/30/23**

07-Nov-23

DESCRIPTION	Note		BALANCE AS OF 9/30/23
CASH IN BANK			
WELLS FARGO OPERATING ACCOUNT - SCRWA'S PORTION	1	(2,670,678.32)	
TOTAL BANK BALANCE			(2,670,678.32)
STATE OF CALIFORNIA LOCAL AGENCY INVESTMENT FUND			
SCRWA LAIF		11,423,581.34	
TOTAL LAIF			11,423,581.34
TOTAL LIQUID FUNDS			8,752,903.02
TOTAL SCRWA FUNDS			8,752,903.02

NOTE:

1. Day to day transactions are made through Gilroy's cash account. The balance held in Gilroy's account on behalf of SCRWA should be close to zero at month end, as the majority of funds will be held in the SCRWA LAIF account.
2. With the start of the SCRWA expansion the cash account will be showing a negative balance since all expenses are on a reimbursement basis.

This is to certify that this schedule of investments is in compliance with SCRWA'S investment policy and that there are adequate funds available to meet SCRWA'S budgeted and actual operating expenses for the next six months.

SIGNED BY : Harjot Sangha
Finance Director

Harjot Sangha

DATE: 11/9/23

SCRWA
Portfolio Management
Portfolio Summary
September 30, 2023

Items	Par Value	Market Value	Book Value	% of Portfolio	Term	Days to Maturity	YTM 360 Equiv.	YTM 365 Equiv.
	11,423,581.34	11,423,581.34	11,423,581.34	100.00	1	1	3.432	3.480
	11,423,581.34	11,423,581.34	11,423,581.34	100.00%	1	1	3.432	3.480

(Check/Checking included in yield calculations)	-2,670,678.32	-2,670,678.32	-2,670,678.32		0	0	0.000	0.000
Cash and Investments	8,752,903.02	8,752,903.02	8,752,903.02		1	1	3.432	3.480

Earnings	September 30	Month Ending	Fiscal Year To Date
1 Year	33,628.42	103,022.48	
90 Day Balance	11,414,838.95	11,465,102.68	
90 Day Rate of Return	3.58%	3.56%	

[Signature] 11/9/2023
 Finance Director

Wastewater Acronyms

BOD	Biochemical Oxygen Demand	NPDES	National Pollutant Discharge Elimination System
COD	Chemical Oxygen Demand	PPM	Parts Per Million
DO	Dissolved Oxygen	TDS	Total Dissolved Solids
CWA	Clean Water Act	TKN	Total Kjeldhal Nitrogen
CWEA	California Water Environment Association	TOC	Total Organic Carbon
Gal	Gallons	TS	Total Solids
GPD	Gallons Per Day	TSS	Total Suspended Solids
Lbs	Pounds	VS	Volatile Solids
MGD	Million Gallons Per Day	VSS	Volatile Suspended Solids
Mg/L	Milligrams Per Liter	WDID	Waste Discharge Identification
MLSS	Mixed Liquor Suspended Solids	WDR	Waste Discharge Requirements
MLVSS	Mixed Liquor Volatile Suspended Solids		
MPN	Most Probable Number		



Operations Management
and Facilities Services
Jacobs Gilroy
1500 Southside Dr.
Gilroy, CA 95020
O 1 408 848 0480
F 1 408 842 0873
www.jacobs.com

Date: 8/18/2023

California Regional Water Quality Control Board
Central Coast Region
Attn: Monitoring and Reporting Review Section
Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Operations Supervisor
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Eff_Inf_Wet
Month: July

Year: 2023
Violation(s): ☒ No ☐ Yes

In accordance with the Standard Provisions and Reporting Requirements, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, 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.

If you have any questions or require additional information, please contact me at the number provided above.

Sincerely,

Name: John Edgar
Title: Operations Supervisor
CC: Jimmy Forbis, SCRWA General Manager
Chris Ghione, Morgan Hill Director of Public Services
Saeid Vaziry, Gilroy Environmental Program Manager



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and Facilities Services
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NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Operations Supervisor
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Land Discharge
Month: July

Year: 2023
Violation(s): ☒ No ☐ Yes

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Date: 9/22/2023

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Central Coast Region
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Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

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Contact Person: John Edgar
Job Title: Operations Supervisor
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Eff_Inf_Wet
Month: August

Year: 2023
Violation(s): ☒ No ☐ Yes

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Date: 9/22/2023

California Regional Water Quality Control Board
Central Coast Region
Attn: Monitoring and Reporting Review Section
Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Operations Supervisor
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Land Discharge
Month: August

Year: 2023
Violation(s): ☒ No ☐ Yes

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Saeid Vaziry, Gilroy Environmental Program Manager



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Date: 10/30/2023

California Regional Water Quality Control Board
Central Coast Region
Attn: Monitoring and Reporting Review Section
Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Project Manager
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Eff_Inf_Wet
Month: September

Year: 2023
Violation(s): ☒ No ☐ Yes

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Project Manager
CC: Jimmy Forbis, SCRWA General Manager
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Date: 10/30/2023

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Dear Ms. Lemoine:

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WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Project Manager
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Monthly
Land Discharge
Month: September

Year: 2023
Violation(s): ☒ No ☐ Yes

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California Regional Water Quality Control Board
Central Coast Region
Attn: Monitoring and Reporting Review Section
Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Project Manager
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Quarterly
Groundwater
Month: July - September

Year: 2023
Violation(s): ☒ No ☐ Yes

In accordance with the Standard Provisions and Reporting Requirements, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, 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.

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Project Manager
CC: Jimmy Forbis, SCRWA General Manager
Chris Ghione, Morgan Hill Director of Public Services
Saeid Vaziry, Gilroy Environmental Program Manager



Operations Management
and Facilities Services
Jacobs Gilroy
1500 Southside Dr.
Gilroy, CA 95020
O 1 408 848 0480
F 1 408 842 0873
www.jacobs.com

Date: 10/30/2023

California Regional Water Quality Control Board
Central Coast Region
Attn: Monitoring and Reporting Review Section
Leah Lemoine
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Project Manager
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Quarterly
Land Discharge
Month: July - September

Year: 2023
Violation(s): ☒ No ☐ Yes

In accordance with the Standard Provisions and Reporting Requirements, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, 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.

If you have any questions or require additional information, please contact me at the number provided above.

Sincerely,

Name: John Edgar Title:
Project Manager
CC: Jimmy Forbis, SCRWA General Manager
Chris Ghione, Morgan Hill Director of Public Services
Saeid Vaziry, Gilroy Environmental Program Manager



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Date: 10/30/2023

California Regional Water Quality Control Board
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895 Aerovista Place, Suite 101
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Dear Ms. Lemoine:

Facility Name: South County Regional Wastewater Authority
WDID Number: 3 430100001
WDR Order Number: R3-2017-0028
NPDES Permit Number: CA0049964

Contact Person: John Edgar
Job Title: Project Manager
Phone Number: (408) 848-0480
Address: 1500 Southside Drive
Gilroy, CA
95020

Type of Report: Quarterly
Surface Water
Month: July - September

Year: 2023
Violation(s): ☒ No ☐ Yes

In accordance with the Standard Provisions and Reporting Requirements, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, 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.

If you have any questions or require additional information, please contact me at the number provided above.

Sincerely,

Name: John Edgar Title:
Project Manager
CC: Jimmy Forbis, SCRWA General Manager
Chris Ghione, Morgan Hill Director of Public Services
Saeid Vaziry, Gilroy Environmental Program Manager



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October 17, 2023

Jimmy Forbis
South County Regional Wastewater Authority
7351 Rosanna Street Gilroy, CA 95020

Subject: Monthly Recap of Expenses Project-to-Date September, 2023

Dear Jimmy,

The project-to-date financial information for September is portrayed in the Operations, Electricity and Solids Disposal Categories for the Municipal Facility.

Through September, total operating expenses, amount to \$821,229.80

Repair costs in September amount to \$41,399.26. Year to date, this represents 08% of the \$695,997.72 repair budget.

Should there be any questions, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "John Edgar".

John Edgar
Project Manager
via email

cc: Erik May (email)
Lauren Mancuso (email)
File

SOUTH COUNTY REGIONAL WATER AUTHORITY
Recap of Expenditures Through
Sep-FY2023

			PROJECT TO DATE		TOTAL	%
	ACTUAL	BUDGET	ACTUAL	BUDGET	ANNUAL BUDGET	EXPENDED
DIRECT COSTS	\$ 400,065	\$ 359,377	\$ 921,206	\$ 936,995	\$ 3,747,980	25% (Not
including RP, PW, and Solids)						
INDIRECT COST	\$ 87,871	\$ 87,871	\$ 263,612	\$ 263,612	\$ 1,054,447	25%
(Overhead & Management Fee)						
PREVAILING WAGE	\$ 22,348	\$ 28,035	\$ 72,457	\$ 84,105	\$ 336,422	22%
REPAIRS	\$ 41,399	\$ 66,923	\$ 55,204	\$ 173,999	\$ 695,998	8%
SOLIDS DISPOSAL	\$ 119,565	\$ 139,781	\$ 339,882	\$ 419,344	\$ 1,677,375	20%
ELECTRICITY	\$ 149,981	\$ 143,594	\$ 663,626	\$ 473,859	\$ 1,723,124	39%
GRAND TOTAL	\$ 821,230	\$ 825,581	\$ 2,315,987	\$ 2,351,914	\$ 9,235,345	25%



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November 17, 2023

Jimmy Forbis
South County Regional Wastewater Authority
7351 Rosanna Street Gilroy, CA 95020

Subject: Monthly Recap of Expenses Project-to-Date October, 2023

Dear Jimmy,

The project-to-date financial information for October is portrayed in the Operations, Electricity and Solids Disposal Categories for the Municipal Facility.

Through October, total operating expenses, amount to \$1,097,303.88

Repair costs in October amount to \$31,043.47. Year to date, this represents 12% of the \$695,997.72 repair budget.

Should there be any questions, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "John Edgar".

John Edgar
Project Manager
via email

cc: Erik May (email)
Mancuso (email)

Lauren
File

PROJECT TO DATE		TOTAL ANNUAL BUDGET		EXPENDED	
ACTUAL	BUDGET				%

[illegible]



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December 15, 2023

Jimmy Forbis
South County Regional Wastewater Authority
7351 Rosanna Street Gilroy, CA 95020

Subject: Monthly Recap of Expenses Project-to-Date November, 2023

Dear Jimmy,

The project-to-date financial information for November is portrayed in the Operations, Electricity and Solids Disposal Categories for the Municipal Facility.

Through November, total operating expenses, amount to \$633,414.54

Repair costs in November amount to \$18,494.54. Year to date, this represents 15% of the \$695,997.72 repair budget.

Should there be any questions, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "John Edgar".

John Edgar
Project Manager
via email

cc: Erik May (email) Lauren
Mancuso (email)
Joe Hall, City of Gilroy (email)
File

PROJECT TO DATE		TOTAL ANNUAL BUDGET		EXPENDED	
ACTUAL	BUDGET				%

[illegible]



Operations Management
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October 11, 2023

Sally Lee
Santa Clara Dept. of Environmental Services
1555 Berger Drive, Bldg. 2, Suite 300
San Jose, CA 95112-2716

Re: Septage Disposal - September 2023

Dear Ms. Lee,

Attached is the Septage Disposal Report for the SCRWA facility which shows monthly volume and fees, and haulers daily volume summary.

Sincerely,

Kerry Edmonds

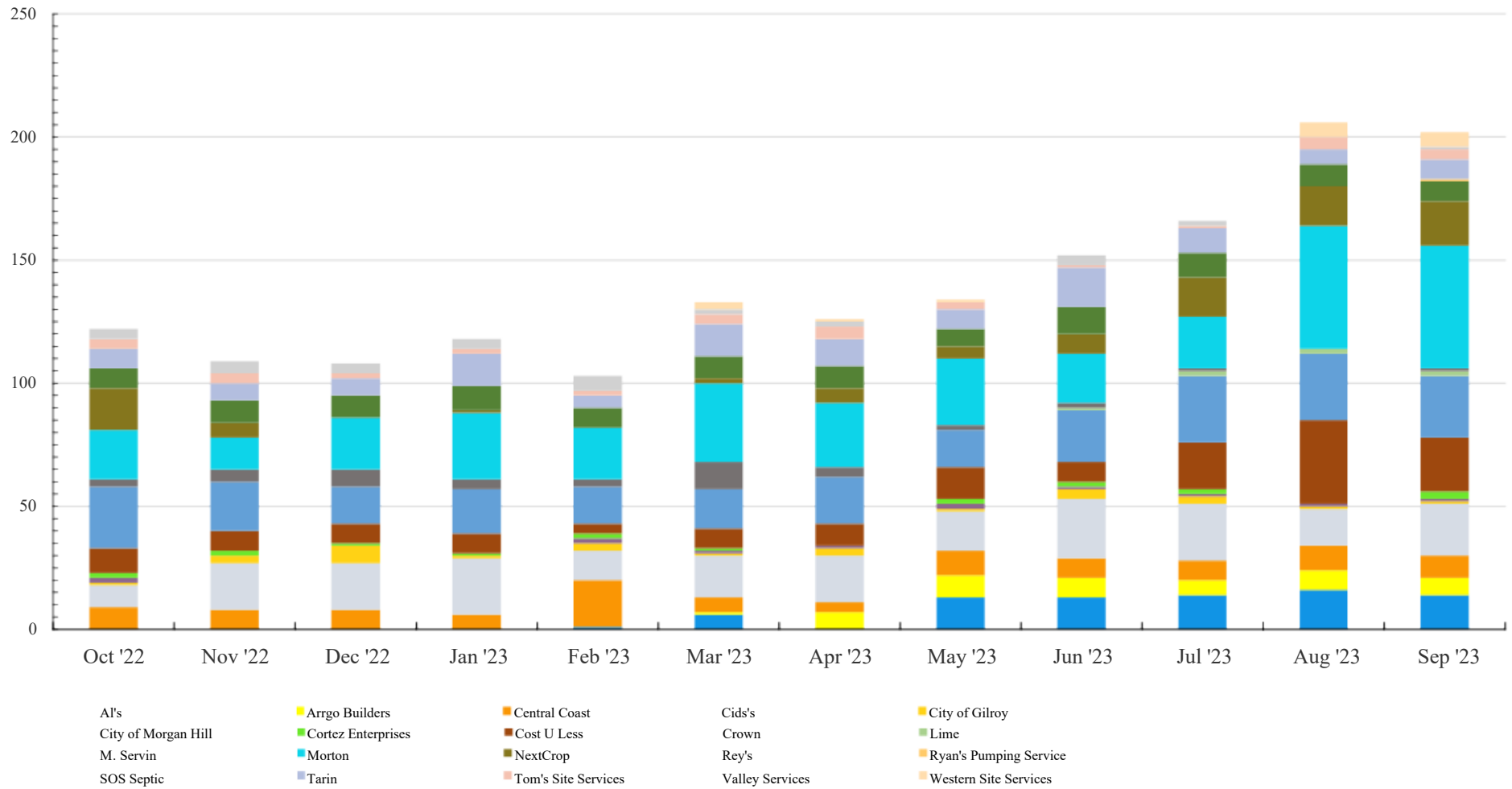
Kerry Edmonds
Project Assistant
Jacobs – Gilroy/Morgan Hill

via email: sally.lee@cep.sccgov.org
swpadmin@cep.sccgov.org
jimmy.forbis@ci.gilroy.ca.us
john.edgar@jacobs.com

cc: File 16.12

September 2023

Total Billable Gallons:	171,676.00
Total Billable Amount:	\$25,751.40

[illegible]



Operations Management
and Facilities Services

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Gilroy, CA 95020 O

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408 842 0873

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November 7, 2023

Sally Lee
Santa Clara Dept. of Environmental Services
1555 Berger Drive, Bldg. 2, Suite 300
San Jose, CA 95112-2716

Re: Septage Disposal - October 2023

Dear Ms. Lee,

Attached is the Septage Disposal Report for the SCRWA facility which shows monthly volume and fees, and haulers daily volume summary.

Sincerely,

Kerry Edmonds

Kerry Edmonds
Project Assistant
Jacobs – Gilroy/Morgan Hill

via email: sally.lee@cep.sccgov.org
swpadmin@cep.sccgov.org
jimmy.forbis@ci.gilroy.ca.us
john.edgar@jacobs.com

cc: File 16.12

Monthly Septage Summary

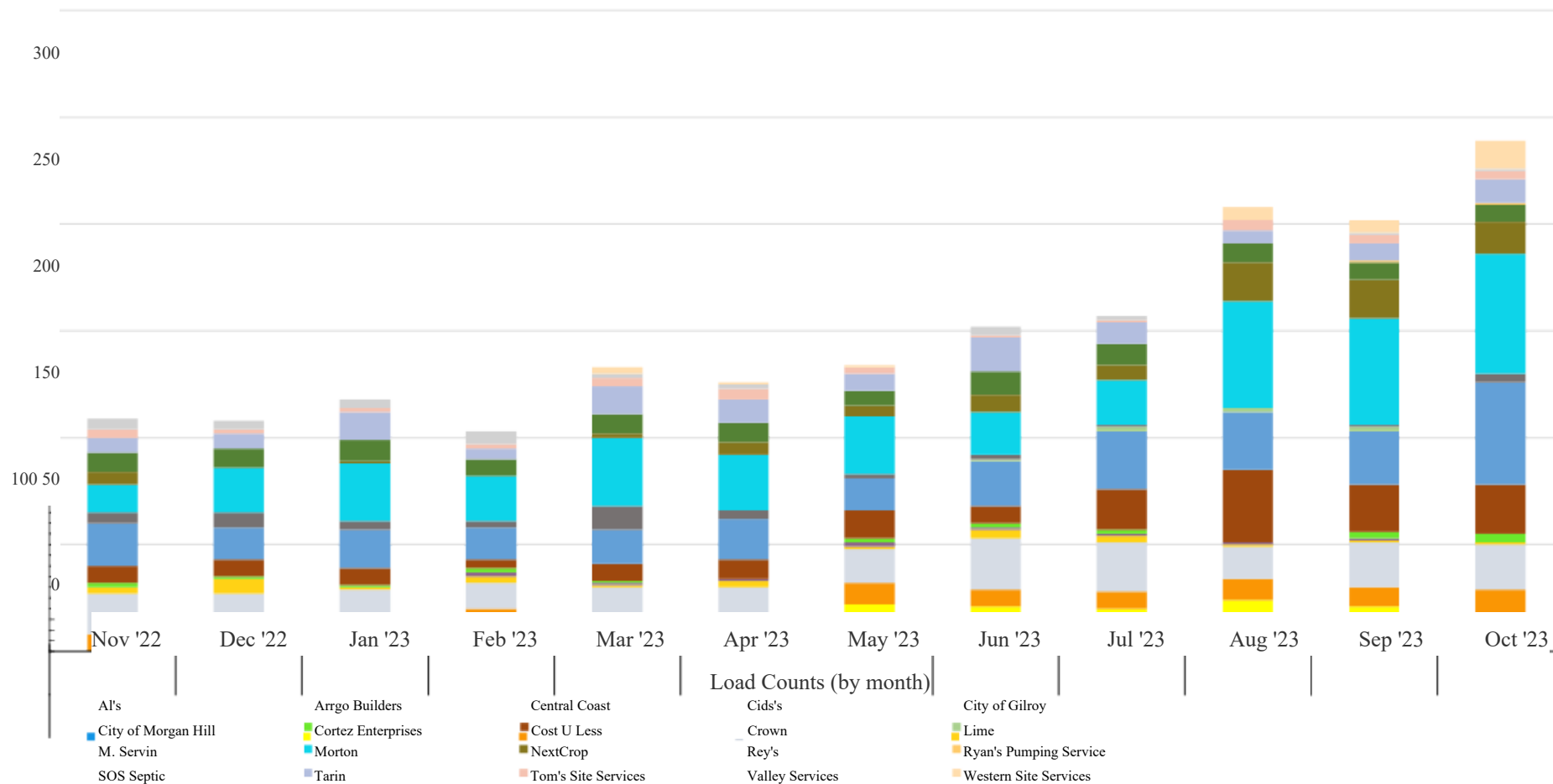
October 2023

								M.											
31		650		1,500	400	1,200	600		300	1,200	400	175					800		
Total GAL	33,420	2,150	2,750	21,100	1,500	9,300	18,200		1,300	71,450	6,000	1,350	1,000		13,600	2,712	500	8,640	700
								5.0		7.50									

Total Billable Gallons:194,972.00

Total Billable Amount:\$29,245.80

Load Counts (by month)





Operations Management
and Facilities Services

1500 Southside Dr.

Gilroy, CA 95020 O

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www.jacobs.com

December 5, 2023

Sally Lee
Santa Clara Dept. of Environmental Services
1555 Berger Drive, Bldg. 2, Suite 300
San Jose, CA 95112-2716

Re: Septage Disposal - November 2023

Dear Ms. Lee,

Attached is the Septage Disposal Report for the SCRWA facility which shows monthly volume and fees, and haulers daily volume summary.

Sincerely,

Kerry Edmonds

Kerry Edmonds
Project Assistant
Jacobs – Gilroy/Morgan Hill

via email: sally.lee@cep.sccgov.org
swpadmin@cep.sccgov.org
jimmy.forbis@ci.gilroy.ca.us
john.edgar@jacobs.com

cc: File 16.12

November 2023

Total Billable Gallons:	183,986.00
Total Billable Amount:	\$27,597.90

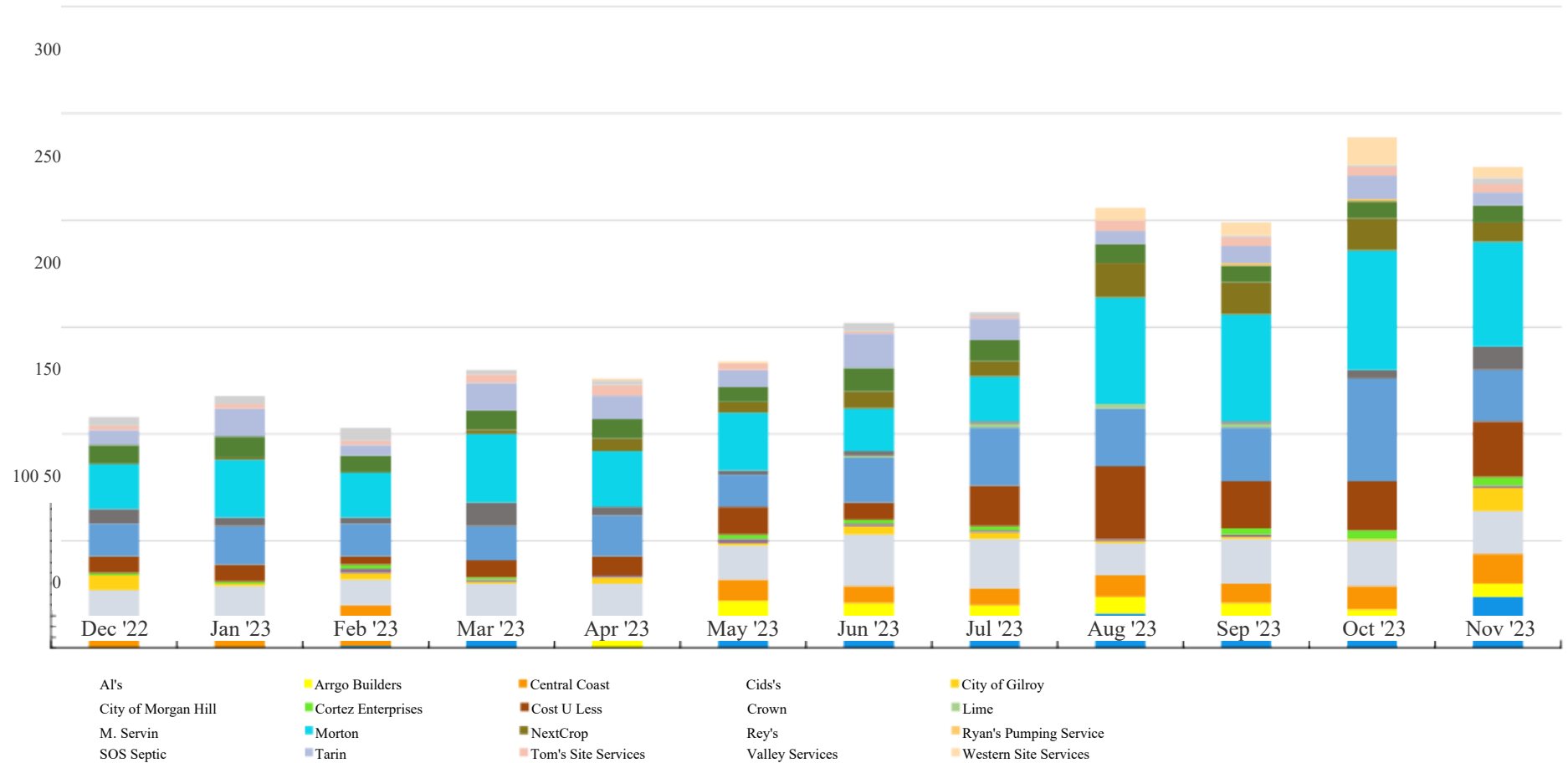
Load Counts (by month)

The chart displays monthly load counts from December 2022 to November 2023. The y-axis represents the number of load counts, ranging from 0 to 300 in increments of 50. The x-axis shows the months. Each bar is composed of segments representing different entities. The total load count starts at approximately 125 in Dec '22, peaks at about 260 in Oct '23, and ends at approximately 245 in Nov '23.

Month	Total Load Count (approx.)
Dec '22	125
Jan '23	135
Feb '23	120
Mar '23	150
Apr '23	145
May '23	155
Jun '23	170
Jul '23	175
Aug '23	225
Sep '23	215
Oct '23	260
Nov '23	245

Legend:

- Al's
- City of Morgan Hill
- M. Servin
- SOS Septic
- Arggo Builders
- Cortez Enterprises
- Morton
- Tarin
- Central Coast
- Cost U Less
- NextCrop
- Tom's Site Services
- Cids's
- Crown
- Rey's
- Valley Services
- City of Gilroy
- Lime
- Ryan's Pumping Service
- Western Site Services



Engineering Projects Report

January 3, 2024

TREATMENT CAPACITY EXPANSION PROJECT

Status: PG&E service change process (Dec 2021) – Application submitted to utility to study system needs
 BAAQMD permit to operate (Dec 2021) – Application in review by local air district (Submitted)
 NPDES permit change (March 2022) – Adoption of new permit by State Water Board (Submitted)
 New plant construction and commissioning (2021- 2025) – In compliance with permits
 Board presentation (2025) – Board accepts completed project

Construction management and inspection services are ongoing. Current activities include mechanical for the headworks, biological process and solids dewatering building areas. Temporary dewatering system is in operation to facilitate construction of new conveyor. Current work includes review of major equipment submittals, shop drawings, contract document clarifications, and contractor's request for information.

Status	2024											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec
Construction	◆											
PG&E Application												
Air District Permit												
NPDES Permit												

Key Milestones	CEQA, Bid Advertisement Process	Board Certified CEQA & Authorizes Bidding	Board Reviews Bids and Awards Contract	Permits & Plant Expansion Construction	Board Accepts Completed Project
Forecast	Oct 2020	Nov 2020	May 2021	2021 - 2025	2025

NPDES/WDR PERMIT RENEWAL

Phase: In Permit Compliance
Project Status: Ongoing tasks

State permit was adopted in 2017. A groundwater study and report as required by the Permit was submitted in 2018. Groundwater contour mapping for the Second Quarter Groundwater Monitoring report is complete. Meeting with RWQCB was conducted in September 2023. NPDES DRAFT comments are anticipated to be received in Spring 2024.

Key Milestones	Adopted Permit	Groundwater Contour Study	Permit Compliance
Forecast	November 2017	April 2018	Ongoing

RECYCLED WATER SYSTEM SUPPORT

Phase: Ongoing operations, maintenance, and customer permit support
Project Status: On Schedule

Ongoing review of customer permits, site inspections, and update of records for new and existing users are in progress. Annual self-inspection and Recycled Water Users Training was conducted in summer 2023. Permit application review for new recycled water users was conducted during the reporting period.

