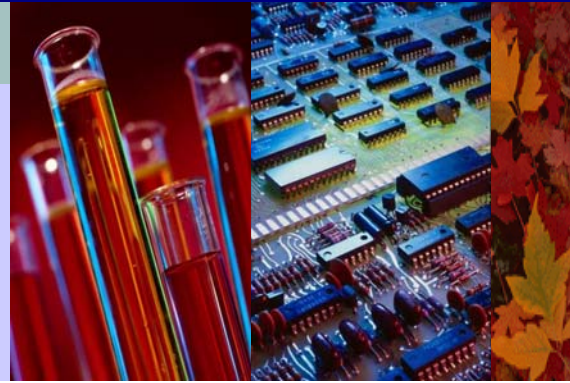


# Pretreatment News



Volume 14, Summer 2011

## EWA Congratulates the 2010 Gold Award Winners



*Hubbard Enterprises recognized for 16 years of perfect compliance.*

The Encina Wastewater Authority (EWA) hosted its 16<sup>th</sup> annual Source Control Program Gold Awards Breakfast on April 27, 2011 to recognize Significant Industrial Users (industries subject to federal categorical pretreatment standards or that discharged over 25,000 gallons per day) that demonstrated compliance with all program requirements during 2010.

for their commitment to environmental excellence. Their exceptional efforts help reduce water pollution and show an extraordinary level of caring for the environment and the community in which they do business. ■

### 2010 Gold Award Winners

- ◆ 16-Year Award
- ◆ Hubbard Enterprises
- ◆ 7-Year Award
- ◆ CVI Melles Griot
- ◆ 4-Year Award
- ◆ Carlsbad Technology
- ◆ Hollandia Dairy
- ◆ Natural Alternatives Intl.
- ◆ 3-Year Award
- ◆ Select Supplements
- ◆ 2-Year Award
- ◆ GE Osmonics
- ◆ Metal Etch Services
- ◆ 1-Year Award
- ◆ Hughes Circuits, Inc.
- ◆ SeaSpine

### 2010 Class III Compliance Award Recipients

EWA would also like to recognize its Class III permittees (consisting of categorical industrial users that discharge < 100 gallons per day and have demonstrated compliance, plus zero-discharge facilities) for their outstanding compliance record, which included passing a thorough facility inspection and submitting all required reports on-time. These industries have helped protect the environment by eliminating or minimizing all industrial discharges. Keep up the good work!

- ◆ American Faucet and & Coatings
- ◆ American Meta-Pack Company
- ◆ Biosyn
- ◆ Black Oxide Service
- ◆ Cabrillo Power
- ◆ California Breakers
- ◆ Callaway Golf Company
- ◆ Crop Production Services
- ◆ Cummins-Allison
- ◆ Ferro Electronic Materials
- ◆ General Electronic Devices
- ◆ Global Health Trax
- ◆ Hocking International Laboratories
- ◆ HRE Performance Wheels
- ◆ Intra-Lock Manufacturing Inc.
- ◆ KEM's Nutraceuticals International
- ◆ Magna Coatings
- ◆ MicroProbe
- ◆ Naturceutical International
- ◆ Nature's Supplements
- ◆ Nutritional Engineering
- ◆ Professional Water Technologies
- ◆ R&F Products
- ◆ Sabre Sciences
- ◆ SenDx Medical
- ◆ Seven Manufacturing
- ◆ Surgistar
- ◆ Westbridge Agricultural Products



## CSR Reminder!

Remember that your semiannual Compliance Status Report (CSR) is due by July 15, 2011. If your permit requires self-monitoring and you have not already collected a self-monitoring sample for the period of January 1 through June 30, 2011 you should do so immediately to avoid increased laboratory costs for rapid turnaround requests. **Be advised that certification statements apply to the entire monitoring period and should not be signed prior to July 1, 2011.** Please contact your area inspector for questions about your sampling requirements. ■

To be a recipient of this award, each industry must successfully undergo a thorough facility inspection, submit two complete Compliance Status Reports, and demonstrate that their wastewater meets applicable discharge standards at least six times during the year. Qualifying for a Gold Award requires the commitment of management and the involvement of employees throughout the organization.

EWA applauds the following 2010 Gold Award recipients

# EWA Energy and Emissions Strategic Plan Completed

The Encina Wastewater Authority (EWA), with assistance from Kennedy Jenks Consultants, has just completed development of its Energy & Emissions Strategic Plan (the Plan). The Plan outlines EWA's future priorities and direction with respect to energy consumption and production. The overall long term objective is *energy independence*, which has been defined as self-generation of 95% of the plant's electricity demand. The objective will be achieved by implementing six incremental projects. These include:

- Implementing energy efficiency measures to reduce energy demand.
- Installing biogas treatment and exhaust catalysts on cogeneration

engines to minimize air emissions and thus eliminate power generation constraints due to air permit restrictions.

- Converting waste to energy through the addition of grease and/or food waste to existing digesters, which will increase biogas production and thus energy production capabilities.
- Adding a 5<sup>th</sup> cogeneration engine to increase the plant's electricity production capacity.
- Installing an Administration Building chiller that will use waste heat generated by the cogeneration engines to cool the building.
- Adding a 6<sup>th</sup> cogeneration engine.

Implementation of the Plan will require a total capital investment of \$14 million over approximately 15 years. The improvements would be financed in part by reduced costs for purchased energy. Most of the projects comprising the Plan have payback periods between three and nine years.

This planning effort was undertaken as a strategic objective of EWA's Board of Directors. Successful implementation of the Plan will help control operating costs by making EWA less reliant on service costs that are beyond the agency's control. It will also distinguish EWA as a public agency that invests in technology to more cost-effectively serve its constituents. ■

*"In the long term, economic sustainability depends on ecological sustainability."*

**America's Living Oceans**  
[Pew Oceans Report, 2003]



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Encina Wastewater Authority  
6200 Avenida Encinas  
Carlsbad, CA 92011  
Phone: (760) 438-3941  
Fax: (760) 476-9852

If you wish to comment on a particular topic, or submit an idea for a future newsletter, please contact Debbie Biggs at the above address or e-mail: [dbiggs@encinajpa.com](mailto:dbiggs@encinajpa.com)

## Compliance Monitoring

One of the responsibilities of an approved pretreatment program is to establish monitoring frequencies for both the Control Authority (EWA) and the permittee, which provide a sufficient number of data points to verify compliance with discharge standards and evaluate whether industries are in Significant Noncompliance (SNC). The General Pretreatment Regulations establish minimum requirements of annual monitoring for Control Authorities and semiannual self-monitoring for Significant Industrial Users (SIUs). EWA currently conducts quarterly sampling at all SIUs, while SIUs must conduct self

-monitoring at least semiannually. (Some industries are required to monitor more frequently depending on wastewater flow, compliance history and potential to affect the treatment plant).

The Environmental Protection Agency (EPA) has established several criteria to use when evaluating if an industry is in SNC (40 CFR 403.8 (f)(2)(viii)). The most commonly applied of these criteria is for Technical Review Criteria (TRC) violations, which are defined as those in which 33% or more of all of the measurements for each pollutant parameter taken during two consecutive calendar quarters, equals or ex-

ceeds the product of the daily maximum or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS and oil and grease, and 1.2 for all other pollutants except pH).

Based on the current minimum monitoring frequencies established by EWA, permittees are vulnerable to being identified as being in SNC based on a single violation in a six-month period that exceeds the TRC criteria (one in three samples = 33%). During 2010, 12 of the 31 SIUs in the EWA service area were identified as being in SNC and of those, six were in SNC based on a single violation. This resulted in a

39% SNC rate for the EWA service area.

The EPA has established a goal that Control Authorities have an SNC rate of no more than fifteen percent. Those with higher rates are scrutinized more closely during annual Pretreatment Program inspections to assess program performance. As a result, EWA will be amending SIU permits to increase self-monitoring frequencies to a minimum of quarterly. This should not only improve the compliance rate of SIUs in the service area, but also help prevent industries from suffering the embarrassment of being published in the newspaper for being in SNC. ■