

ENCINA WASTEWATER AUTHORITY

A Public Agency

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February 28, 2018

Via CIWQS

Ref: EC 18-0070

California Regional Water Quality Control Board San Diego Region 2375 Northside Drive, Suite 100 San Diego, CA 92108

Attention:

Ms. Joann Lim

SUBJECT: Submittal of 2017 Annual Pretreatment Program Report

Period January 1, 2017 through December 31, 2017

Dear Joann,

Enclosed please find a copy of the Encina Wastewater Authority Annual Pretreatment Program Report for 2017. This report is submitted as required by NPDES Permit Number CA0107395.

Please contact Doug Campbell, Director of Environmental Compliance, at (760) 438-3941, ext. 3600, if you have any questions.

Sincerely

Michael Steinlicht General Manager

Attachment

CC:

Amelia Whitson, EPA Region IX

Russell Norman, State Water Resources Control Board

Gary Erbeck, San Diego County Department of Environmental Health

ENCINA WASTEWATER AUTHORITY

2017 ANNUAL PRETREATMENT PROGRAM REPORT

NPDES PERMIT HOLDER AND SEWER AUTHORITY NAME:

Encina Wastewater Authority

REPORT DATE:

February 28, 2018

PERIOD COVERED BY THIS REPORT:

January 1 – December 31, 2017

NAME OF POTW:

Encina Water Pollution

Control Facility

NPDES PERMIT NUMBER:

CA0107395

PERSON TO CONTACT CONCERNING INFORMATION CONTAINED IN THIS REPORT:

Doug Campbell
Director of Environmental Compliance
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, CA 92011-1095
Telephone: (760) 438-3941, ext. 3600

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

For Michael Steinlicht

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General Manager

Dated:

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Encina Wastewater Authority Annual Pretreatment Program Report

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Program Summary

The Encina Wastewater Authority (EWA) operates an approved pretreatment program in North San Diego County. EWA is a joint powers authority consisting of six member agencies: the Cities of Vista, Carlsbad and Encinitas, as well as the Vallecitos Water District, the Buena Sanitation District and the Leucadia Wastewater District. The Encina System is comprised of the collection, treatment and disposal facilities of its member agencies including: the Encina Water Pollution Control Facility, the Gafner Water Reclamation Facility, the Meadowlark Water Reclamation Facility, the Carlsbad Water Recycling Facility and the Encina Ocean Outfall.

EC: 18-0065

The EWA service area encompasses a population of approximately 372,000 and covers a 125 square mile area. This area is predominantly characterized by residential development. At the end of 2017, the combined industrial flow to the EWPCF and MWRF (0.201 MGD) represented only 0.78% of the total average daily influent to both treatment plants (25.82 MGD). It is anticipated that the percentage of industrial flows will remain low due to continued residential growth in the service area.

During 2017, there were no incidents of upset or pass-through at EWA attributed to industrial users. All monitoring of the Encina Ocean Outfall and receiving water demonstrated compliance with regulatory standards.

At the end of 2017, EWA had 59 permitted Industrial Users (IUs): 19 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 37 Class III Industrial Users (Non-Significant CIUs, zero-discharge CIUs and other businesses with the potential to impact the Encina System). EWA staff conducted 26 inspections and collected 111 samples in the CIU/SIU categories. Additional inspections and sampling of Class III IUs were also conducted. Laboratory data confirm that the Best Management Practices (BMP) Program implemented during 1999 and 2000 has been effective overall in reducing the level of pollutants discharged to the Encina System.

EWA maintains a proactive enforcement stance. During 2017, 34 Notices of Violation (NOVs) were issued and \$9,950.00 in fines and enforcement costs were assessed. Three of the 25 CIU/SIUs in the service area during the year were found to be in Significant Non-Compliance (SNC). One of the industries was in SNC for discharging without a permit and has since been issued a Class I discharge permit. Another industry was in SNC based on a single monthly average violation and has identified the problem and taken corrective actions to reestablished compliance. The final industry was in SNC in three of the four quarters; they have taken corrective actions, but if the issue persists, the industry will be placed on a Compliance Schedule in 2018.

Local Limit Studies for the Encina Water Pollution Control Facility (EWPCF) and Meadowlark Water Reclamation Facility (MWRF) were completed in December 2009; final approval was received from the San Diego Regional Water Quality Control Board

(RWQCB) on March 14, 2012. EWA's Pretreatment Ordinance was amended to reflect the new technically-based local limits, including other recommended changes. EWA expects to conduct our next domestic sewage study in 2018 and then submit our local limits evaluations in Fiscal Year 2019, following our anticipated NPDES permit renewal in 2018.

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Summary of Analytical Results

Data required in this section has been reported electronically to the California RWQCB through the California Integrated Water Quality System (CIWQS). Please refer to the Encina Water Pollution Control Facility and Ocean Outfall 2017 monthly, quarterly, and semiannual self-monitoring reports for Order No. R9-2011-0019, NPDES Permit No. CA0107395. Full priority pollutant scans of the influent and effluent for the EWPCF and MWRF are attached in Appendix A.

Upset, Interference or Pass-through Incidents

There were no incidents of upset, interference or pass-through at EWA, attributed to industrial users.

All regularly scheduled monitoring at the ocean outfall demonstrated that EWA's effluent quality remains consistent and meets or exceeds regulatory standards. Receiving water monitoring during 2017 also met compliance standards.

Industrial Users

At the end of 2017, EWA had 59 permitted IUs: 19 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 37 Class III Industrial Users (Non-Significant CIUs, zero-discharge CIUs and other businesses with the potential to impact the Encina System). The industrial contribution to EWA from CIUs/SIUs (0.201 MGD) as a percentage of the average daily influent (25.82 MGD) is only 0.78%. It is anticipated that the percentage of industrial flows will remain low due to continued residential growth in the service area.

Appendix B contains a list of all SIUs along with: federal category, if applicable; type of pretreatment in place; the number of inspections conducted; the number of samples collected by EWA; the number of samples collected by the IU; the number of limit violations; the IU's compliance status by quarter; whether all Total Toxic Organics (TTO) certifications or monitoring data were submitted; and a summary of any enforcement actions taken. Below is a list of additions, changes of status and deletions that occurred during the year.

Additions

 Douglas Technologies Group – Vista, California - A new Class I permit was issued to this facility in November, which is subject to 40 CFR Part 433 PSNS.

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- J&D Laboratories, Inc. Vista, California This business, which is subject to 40 CFR Part 439, Subpart D PSNS, underwent a change in ownership; although, the name remained unchanged. A new Class I permit was issued in December.
- McCain Manufacturing, Inc. Vista, California A new Class I permit was issued to this facility in April, which is subject to 40 CFR Part 433 PSNS.

Changes of Status

 Alphatec Spine, Inc. – Carlsbad, California – This business, which was subject to 40 CFR Part 433, was reclassified from a Class I permit to a Best Management Practices (BMP) permit. A new BMP permit was issued in March.

Deletions

- GE Osmonics, Inc. Vista, California This business, which was subject to local limits, ceased all operations. Their Class II (SIU) Permit was rescinded in February.
- SeaSpine, Inc. Vista, California This business, which was subject to 40 CFR Part 433, relocated all remaining operations to their new facility in Carlsbad. Their Class I Permit was rescinded in January.

Appendix C contains a list of industries that EWA has designated as Non-Significant Categorical Industrial Users (NSCIUs) based on their limited ability to impact the Encina System (discharge less than 100 gallons per day, never discharge concentrated wastestreams, and have demonstrated compliance with applicable discharge limits.) EWA continues to perform annual inspections of these businesses and each industry must submit semiannual certification statements that they continue to meet the NSCIU criteria.

Baseline Monitoring Report Requirements

Douglas Technologies Group was issued a Class I permit in November. They manufacture aluminum wheels and miscellaneous accessories for ATVs, sand buggies, racing karts, and automotive applications and are subject to 40 CFR Part 433. Baseline monitoring demonstrated compliance with Metal Finishing Pretreatment Standards and EWA local limits.

J&D Laboratories, Inc. was issued a Class I permit in December. They manufacture dietary supplements in the form of tablets and gel capsules and are subject to 40 CFR Part 439. This was an ownership change only; thus, no baseline monitoring was required. Baseline monitoring and subsequent sampling events under the previous ownership had demonstrated compliance with Pharmaceutical Manufacturing Pretreatment Standards and EWA local limits.

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McCain Manufacturing, Inc. was issued a Class I permit in April. They perform metal fabrication and finishing processes in the manufacture of electronic equipment and other miscellaneous products and are subject to 40 CFR Part 433. Baseline monitoring demonstrated compliance with Metal Finishing Pretreatment Standards and EWA local limits.

Enforcement Activities

EWA maintains a proactive enforcement stance. During 2017, 34 Notices of Violation (NOVs) were issued and \$9,950.00 in fines and enforcement costs were assessed. Administrative Orders are not an approved element of EWA's Enforcement Response Plan.

Of the 25 SIUs in the service area during the year, three were found to be in SNC. These industries are discussed below.

McCain Manufacturing, Inc. which is subject to 40 CFR Part 433.17, was found discharging without a permit. A Cease and Desist Order was issued on January 27, 2017. The industry was designated as being in SNC for discharging without a permit. Since issuing the Cease and Desist Order, the industry operated as a zero discharge facility until their Class I discharge permit was issued on April 27, 2017.

Metal Etch Services had one violation of the federal daily maximum and one violation of the federal monthly average limit for chromium; one violation of the local limit for iron; one violation of the federal daily maximum and one violation of the federal monthly average limit for silver, and one violation of the federal daily maximum and one violation of the federal monthly average limit for zinc. NOV's issued and \$100.00 in fines assessed. Industry was in SNC at the end of the third and fourth quarters for silver. Metal Etch Services attributes the violations to insufficient cleaning intervals for the sample reservoir. The problem was addressed by cleaning Sample Point #1 and increasing the cleaning frequency to bi-monthly and incorporating a maintenance log to document the events. Subsequent monitoring demonstrated compliance.

<u>Primarch Manufacturing, Inc.</u> had one violation of the federal daily maximum and three violations of the federal monthly average limit for acetone. NOV's issued and \$1,900.00 in fines assessed. Industry was in SNC at the end of the first, third, and fourth quarters for acetone. The facility does not use acetone, but they've determined the violations are caused from the breakdown of isopropyl alcohol (IPA) in their clarifier.

To help prevent future violations, the industry now pumps out and cleans their clarifier on a quarterly basis; they changed from technical grade to USP grade IPA to help reduce acetone concentrations, and they're also restricting the amount of IPA used in the facility. Monitoring performed in the fourth quarter has demonstrated compliance; but if the issue persists, the industry will be placed on a Compliance Schedule in 2018.

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Pollution Prevention Plans

No industries have submitted or been required to submit a pollution prevention plan.

Best Management Practices Program

In addition to the regulation of SIUs, EWA has attempted to reduce the level of pollutants entering the system through the implementation of a BMP Program. The program began in 1999 with staff development of a wide variety of BMPs for non-significant industrial users. A preliminary file review was performed on each user to determine eligibility to participate in the program. This was followed by an inspection, sampling event and interview to identify applicable pollution prevention strategies.

Users who demonstrated a willingness to participate in the program agreed to implement a variety of actions directed at reducing the level of pollutants in their discharge. Follow-up sampling and inspections are used to verify program effectiveness.

EWA influent data indicates that the BMP Program has been effective in reducing the level of pollutants discharged to the sewer system. Implementation of the program resulted in a reduction in the number of Class III Permits from 304 at the beginning of 1999 to 35 at the end of 2000. Few changes to user classifications have occurred in recent years; however, new non-significant industrial users are encouraged to participate in the program. EWA currently has 528 businesses in the BMP program.

Significant Changes in Pretreatment Program Operation

On March 14, 2012, the San Diego Regional Water Quality Control Board (RWQCB) adopted an amendment to Order No. R9-2011-0019 incorporating new technically-based local limits into EWA's National Pollution Discharge Elimination System permit. Significant changes include: the addition of local limits for arsenic, mercury, molybdenum, and selenium; relaxed local limits for cadmium, copper, lead, nickel, zinc, and pH; and for industries located in the Meadowlark Water Reclamation Facility service area, additional local limits for boron, iron, and manganese, plus more stringent local limits for biochemical oxygen demand and total suspended solids.

Furthermore, to help improve industrial user compliance rates, EWA has: increased the minimum self-monitoring frequency for SIUs from semiannually to quarterly; and revised the sample type from grab to composite for certain constituents (e.g. oil and grease, cyanide and organics) where applicable. To incorporate these changes, EWA rescinded and reissued all Class I/II SIU permits. This was completed by July 2012. EWA completed the process of rescinding and reissuing all Class III permits in 2013.

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Emergency Connection to the Encina Sewerage System

The City of Vista maintains an agreement with the City Oceanside to provide a connection to the City of Vista collection system for emergency wastewater disposal. This connection was activated on June 22, 2017. Since that time, the City of Oceanside has been discharging an average of 1.2 MGD to the City of Vista collection system. The wastewater is then conveyed to the Encina Water Pollution Control Facility for treatment and discharge to the Pacific Ocean. On January 29, 2018, EWA received notification from the City of Oceanside that the emergency connection will be made permanent.

The area contributing wastewater to the City of Vista is characterized as mainly residential with light commercial and one Significant Industrial User, Tri City Medical Center. The City of Oceanside has categorized this facility as a Non-Categorical Significant Industrial User as they discharge greater than 25,000 gpd of industrial wastewater. The facility is regulated under the City of Oceanside's local limits and must perform semiannual self-monitoring events. No violations of the City of Oceanside or the Encina Wastewater Authority's (EWA) local limits were identified in CY 2017. Since the connection from the City of Oceanside has become permanent, the Tri City Medical Center's permit will be amended to incorporate EWA's local limits.

Starting in CY 2018, the City of Oceanside will be required to provide an annual report characterizing the compliance status for each SIU discharging to the Encina System including: name and category of each SIU; type of pretreatment; number of samples taken by the SIU; number of samples and inspections performed by the City of Oceanside; whether all required certifications were provided; a list of pollutant violations (categorical or local); industries in SNC at any time during the year; a summary of enforcement actions taken during the year, and the names of any SIU's required to submit a BMR. Semiannual reports will also be required detailing the: names and address of all SIUs which violated any discharge or reporting requirements; a description of the violation, and a description of the enforcement actions taken. EWA will then include this information in our Semiannual and Annual Pretreatment Program Reports. The City of Oceanside will be required to incorporate EWA's local limits into all SIU permits, which discharge to the Encina System. Where both EWA and the City of Oceanside have a limit for the same constituent, the most stringent limit will be enforced.

Summary of Annual Pretreatment Budget

In FY 2018, EWA's Pretreatment Program budget totaled \$691,268. (The amount budgeted may vary slightly from actual expenditures.) This reflects approximately a 7% decrease from the amount budgeted during FY 2017. This can be attributed to the funds budgeted under Professional Services in CY 2017 to complete EWA's local limits evaluation being carried forward to CY 2018. Although, since the funds have already been allocated, they are not reflected in the current budget, but they remain available. The number of staff members remained unchanged. A line item detail of the budget is attached for reference in Appendix D.

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Public Education

The EWPCF has been designed to maximize the use of alternative and renewable resources, including methane gas and biosolids, plus generate effluent for recycled wastewater operations. The facility regularly hosts tours for grade school, middle school, high school, and college students.

EWA also participates in other community outreach activities. In 2017, EWA staff utilized its wastewater treatment plant model for hosting booths at the City of Carlsbad's Citizen's Academy and Public Works Fairs (spring and fall), World Water Day at the Agua Hedionda Discovery Center, Alta Vista Gardens Earth Day, and the Leucadia Wastewater Authority Open House. In addition, copies of the brochure entitled "10 Simple Things You Can Do to Protect the Ocean" were provided to various organizations and private citizens as requested, plus EWA publishes several newsletters a year and maintains multiple social media outlets.

40 CFR Part 403.8(f)(2)(viii) requires at least annual public notification, in the largest daily newspaper in the POTW's service area, of industrial users, which at any time during the previous twelve months, were found in significant non-compliance. Attached in Appendix E is a copy of the SNC publication for the period of January 1 to December 31, 2017.

Biosolids Disposal Methods

In 2017, EWA produced approximately 5,861.91 Dry Metric Tons (DMT) of Class A and Class B biosolids. Most of this material (5,236.395 DMT) was transported by Ag Tech, LLC to farms in Yuma and Somerton, Arizona for land application. The remainder (625.5 DMT) were sold/and or given away for use in the following applications: golf courses, nurseries, High School FFA Organizations, soil blenders and fertilizer products.

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Laboratory data demonstrates that metal levels in the biosolids are well below the allowable pollutant concentrations for land application as found in Table 3 of 40 CFR Part 503.13. The ability to consistently meet these standards is largely due to EWA's small industrial base and effective Pretreatment Program.

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Appendix A Priority Pollutant Laboratory Data

Appendix B Significant Industrial User Listing

Quarter (GPD) Status
С
110
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Industry ceased all manufacturing operations in December 2016 and vacated the 5830 El Camino Real building in January 2017; core metal finishing operations also ceased in January 2017. No regulated industrial wastewater discharged to sewer in CY 2017. Industry reclassified from a Class I to a Best Management Practices (BMP) permit on March 30, 2017. Required TTO certifications submitted.

CARLSBAD TECHNOLOGY, INC.	1	1	2	2		С	
5923 Balfour Court	2		2	2		С	
Carlsbad, CA 92008	3		2	2		С	
40 CFR Part 439, Subpart D PSNS	4		2	2	1	NC	
Pretreatment: pH neutralization							1,050

One violation of the local limit for pH. NOV issued and \$200.00 in fines assessed. Findings of the investigation and steps taken to prevent recurrence are not due until March 8, 2017.

CINTAS CORPORATION	1		1	1	1	NC	
460 West California Avenue	2	1	1	2		NC	
Vista, CA 92084	3		1	1		С	
Industrial Laundry - Local Limits	4		1	1		С	
Pretreatment: settling, dissolved air flotation							60,000

One violation of the local limit for BOD. NOV issued and \$350.00 in fines assessed. Industry attributes the violation to a large amount of sludge and build up in the bottom incoming portion of the DAF unit. They determined this affected the mixing and flow of the incoming wastewater and treatment chemicals, which reduced the performance of the pretreatment system. In response, the industry cleaned the DAF unit and associated piping.

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
DOUGLAS TECHNOLOGIES GROUP	1						
1340 North Melrose Drive	2						
Vista, CA 92083	3	1					
40 CFR Part 433 PSNS	4					С	
Pretreatment: hauling and evaporation							40*

New permittee. Initial permit (#6274) issued to Douglas Technologies Group on November 17, 2017. *Industry anticipates discharging an annual average of 40 gallons per production day in batch discharges up to 2,500 gallons. No discharges to sewer of regulated industrial wastewater occurred in CY 2017. Required TTO certifications submitted.

GE OSMONICS, INC.	1	1		С	
760 Shadowridge Drive	2				
Vista, CA 92083	3				
Manufacture of water purification equip – Local Limits	4				
Pretreatment: hauling, flow equalization					0

Industry ceased all production on November 30, 2016. All materials and most of the equipment were removed in January 2017. No industrial wastewater discharged to sewer in CY 2017. Permit rescinded on 2/8/2017.

GLANBIA NUTRITIONALS (NA), INC.	1		1	1		С	
2840 Loker Avenue East, Suite #101	2		1	3	1	NC	
Carlsbad, CA 92010	3		2	1	1	NC	
40 CFR Part 439, Subpart D PSNS	4	1	2	2	1	NC	
Pretreatment: pH neutralization, settling/clarifier							600

One violation of the federal monthly average limit for acetone, one violation of the local limit for chromium, and one violation of the local limit for pH. NOV's issued and \$400.00 in fines assessed. Industry attributes the acetone violation to a bacterial growth in their clarifier. To correct the problem, the clarifier was cleaned; and going forward, industry will clean it on an annual basis. This is in addition to their routine monthly pump outs of the clarifier. The chromium violation was related to processing CHROMAX ADVANCE which is 10% chromium by weight. The industry has now established a process to capture wash/rinse water generated from manufacturing CHROMAX ADVANCE for off-site disposal. Industry associates the low pH value to an increase in production of products containing citric and fumaric acids. In response, industry developed a cleaning SOP "Cell and Corridor Cleaning Procedure (CA)". Cleaning wastewater is now captured; pH analyzed with hand held monitor, and the wastewater is neutralized (if necessary) and then reanalyzed prior to discharge. SOP includes a check list with task responsibilities. This procedure will be followed for all blends as a preventive measure.

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
HOLLANDIA DAIRY, INC.	1		1	1		С	
622 East Mission Road	2	2	1	1		С	
San Marcos, CA 92069	3		1	1		С	
Dairy & Creamery - Local Limits	4		1	1		С	
PT: flow equalization, pH neutralization, MBBRs, DAF							35,000
HRE PERFORMANCE WHEELS 2611 Commorae Way, Suite D	1		1	1		С	
2611 Commerce Way, Suite D Vista, CA 92081	3	1	1	1		C	
40 CFR Part 433 PSNS		1	•	•			
Pretreatment: hauling, recycling	4		1	1		С	60
Required TTO certifications submitted.							00
HUGHES CIRCUITS, INC. 540 South Pacific Street San Marcos, CA 92078	1 2 3		1 2 1	2 2 3		C C	
40 CFR Part 433 PSNS	4	1	2	2		C	
Pretreatment: pH adjustment, precipitation & settling	4	1				C	9,200
Required TTO certifications submitted.	•	1					-,

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
IONIS PHARMACEUTICALS	1					С	
2282 Faraday Avenue	2					С	
Carlsbad, CA 92008	3	1				С	
40 CFR Part 439, Subpart C PSNS	4					С	
Pretreatment: hauling							0

Pharmaceutical manufacturing currently being performed off-site. No discharge of federally regulated wastewater to-date.

J&D LABORATORIES, INC.	1		1	1	2	NC	
2710 Progress Street	2		2	1		NC	
Vista, CA 92081	3		2	1	1	NC	
40 CFR Part 439, Subpart D PSNS	4	1	2	1		NC	
PT: pH neutralization, settling/clarifier, oil skimmer							12,100

One violation of the local limit for copper, one violation of the local limit for zinc, and one violation of the local limit for O&G. NOV's issued and \$450.00 in fines assessed. Industry attributes the copper and zinc violations to improper cleaning of utensils, equipment, and work areas, plus they missed their scheduled cleaning of Sample Point #1. To resolve the problem, all staff that handle production materials were retrained on the company's cleaning procedures reinforcing dry cleaning of all utensils, work areas and blenders to reduce the amount of material entering the wastestream during wet cleaning. Sample Point #1 was also cleaned in response to the violations and is back on a routine cleaning schedule. The industries' investigation into the O&G violation determined that the coalescer plates and screens in their clarifier had deteriorated and required replacing. Industry had their clarifier cleaned, and the coalescer plates and screens replaced on 10/2/2017. Facility also had an ownership change in CY 2017. Permit #6288 was issued to J&D Laboratories, Inc. under their new ownership on 12/20/2017.

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)	
McCAIN MANUFACTURING, INC.	1	2						
2633 Progress Street	2		1	1		С		
Vista, CA 92081	3		1	2		С		
40 CFR Part 433 PSNS	4		1	1		С		
Pretreatment: settling/clarifier, OWS, pH neutralization							40	
Industry found discharging federally regulated wastewater without a permit on January 18, 2017. Cease and Deist Order issued followed by a NOV assessing \$1,100.00 in fines. New Class 1 permit issued on April 27, 2017. See Enforcement Activities section of the Annual Pretreatment Report for								

additional details.

			1	, , , , , , , , , , , , , , , , , , , ,		
MELLES GRIOT	1		3	3	С	
2051 Palomar Airport Road, Suite #200	2	1	3	3	С	
Carlsbad, CA 92011	3		3	3	С	
40 CFR Part 433 PSNS	4		3	3	С	
Pretreatment: pH neutralization, hauling						900

Required TTO certifications submitted.

METAL ETCH SERVICES	1		1	1		С	
1165 Linda Vista Drive, Suite #106	2		1	1		С	
San Marcos, CA 92078	3		1	1	7	SNC	
40 CFR Part 433 PSNS	4	1	2	1		SNC	
Pretreatment: pH neutralization, hauling							360

One violation of the federal daily maximum and one violation of the federal monthly average limit for chromium; one violation of the local limit for iron; one violation of the federal daily maximum and one violation of the federal monthly average limit for silver, and one violation of the federal daily maximum and one violation of the federal monthly average limit for zinc. NOV's issued and \$100.00 in fines assessed. See Enforcement Activities section of the Annual Pretreatment Report for additional details. Required TTO certifications submitted

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
NATEL	1		1	1		С	
6350 Palomar Oaks Court	2	1	1	2		С	
Carlsbad, CA 92011	3		1	1		С	
40 CFR Part 433 PSNS	4		1	2		С	
Pretreatment: hauling							1,500
NATURAL ALTERNATIVES INTERNATIONAL	1		2	2		С	
1215 Park Center Drive	2	1	2	2		С	
Vista, CA 92081	3		2	2		С	
40 CFR Part 439, Subpart D PSNS	4		2	2		С	
Pretreatment: settling/clarifier							2,860
AULTRITIONAL ENGINEERING INC						, vo	
NUTRITIONAL ENGINEERING, INC.	1		1	1	2	NC	
1208 Avenida Chelsea	2		2	1	1	NC	
Vista, CA 92081	3	1	3	1		NC	
40 CFR Part 439, Subpart D PSNS	4		1	1		С	
Pretreatment: hauling & pH neutralization							250

One violation of the local limit for silver and two violations of the local limit for pH. NOV's issued and \$650.00 in fines assessed. Industry was not able to identify the exact source of the silver violation, but they suspect it may be attributed to performing R&D work for a new customer involving colloidal silver. Industry attributes the 5/18/2017 pH violation to processing a large volume of citric acid that day. Industry notes that residue material was not being removed from utensils prior to cleaning. In both incidents, industry retrained staff on proper removal of residual material prior to cleaning and handling of wastewater. Industry reports the 3/16/2017 low pH violation was caused by an employee rinsing an empty phosphoric acid drum at the sink. Industry now collects and hauls all wastewater generated from rinsing drums that previously contained chemicals.

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
PRIMARCH MANUFACTURING, INC.	1		1	2	2	SNC	
1211 Liberty Way, Suite A	2	1	1	3		С	
Vista, CA 92083	3		1	4	2	SNC	
40 CFR Part 439, Subpart D PSNS	4		1	3		SNC	
Pretreatment: settling/clarifier, oil & grease removal							1,500

One violation of the federal daily maximum and three violations of the federal monthly average limit for acetone. NOV's issued and \$1,900.00 in fines assessed. See Enforcement Activities section of the Annual Pretreatment Report for additional details.

PRUDENTIAL OVERALL SUPPLY	1		1	1		С	
2485 Ash Street	2		1	1	1	NC	
Vista, CA 92081	3		1	1		NC	
Industrial Laundry - Local Limits	4	1	2	1		С	
PT: flow equalization, pH neutralization, settling, DAF							67,000

One violation of the local limit for BOD. NOV issued and \$100.00 in fines assessed. Industry determined that the violation was caused by an excessive buildup of solids in the bottom of the DAF tank. When the skimmer and bottom scraper were in operation, settled material billowed up and was carried over the weir with the effluent causing the high BOD discharge. The solids buildup was attributed to a lapse in preventative maintenance. Sludge removal for the DAF tank was scheduled for March, but was not performed until April 7th. To prevent future buildups, Maintenance personnel have been directed to strictly follow the maintenance schedule detailed in the Wastewater Treatment Tank Maintenance SOP.

SEASPINE, INC.	1		С	
2302 La Mirada Drive	2			
Vista, CA 92081	3			
40 CFR Part 433 PSNS	4			
Pretreatment: hauling, neutralization				0

Industry ceased discharge of regulated industrial wastewater in November 2016. Remaining operations relocated to their Carlsbad facility in January 2017. Permit rescinded on 1/4/2017.

Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
1		1	1		С	
2		1	1		С	
3	1	1	1		С	
4		1	1		С	
						250
	Quarters 1 2	Quarters Inspections 1 2	Quarters Inspections Monitoring 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Quarters Inspections Monitoring Monitoring 1 1 1 1 2 1 1	Quarters Inspections Monitoring Monitoring Violations 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Quarters Inspections Monitoring Monitoring Violations Quarter Status 1 1 1 1 C 2 1 1 1 C 3 1 1 1 C

Required TTO certifications submitted.

SELECT SUPPLEMENTS, INC.	1		1	1	*	С	
5800 Newton Drive	2		1	2	1	NC	
Carlsbad, CA 92008	3	1	2	4	1	NC	
40 CFR Part 439, Subpart D PSNS	4		2	4		NC	
Pretreatment: settling/clarifier							1,867

Two violations of the local limit for O&G. NOV's issued and \$700.00 in fines assessed. In both cases, the industry reported that they were unable to identify the source of the violations. In response, the industry is now having their clarifier cleaned on a quarterly basis in addition to monthly pump outs of the unit, plus they've installed oil absorbent booms "Pigs" in all three chambers of the clarifier. The booms are replaced approximately every two weeks. *Note – an error was identified in Select Supplements' limit calculations that caused their discharge standards to be lower than they actually were. The error has been corrected, and the industries' discharge standards revised in the Permit Amendment issued 10/31/2017. As a result, the 3/7/2017 O&G violation was rescinded, and the fines for the 6/1/2017 and 8/22/2017 O&G violations were reduced.

SELECT SUPPLEMENTS, INC.	1		1	2	3	NC	
2390 Oak Ridge Way	2		1	1		С	
Vista, CA 92081	3	1	1	1		С	
40 CFR Part 439, Subpart D PSNS	4		1	1		С	
Pretreatment: settling/clarifier							1,800

Three violations of the local limit for pH. During the annual inspection performed on 9/6/2017, EWA's review of the industries Process Control Log revealed 13 pH violations that the industry failed to report. The violations occurred between 9/8/2016 and 3/7/2017 (three in 2017). NOV issued and \$1,100.00 in fines assessed. The industry attributes the pH violations to an error in their wastewater neutralization procedure. Industry had noted the upper limit of the pH range as 12 instead of 12.0. This in turn lead staff to believe that values, which rounded to 12, were within the acceptable discharge range. To prevent future violations, the industry has revised the pH range in their procedure and noted the exact local limit on their Clarifier pH Report (daily log), so it's visible to all staff involved.

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self- Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
VERSUM MATERIALS US, LLC.	1	1	1	1		С	
1969 Palomar Oaks Way	2		2	1		С	
Carlsbad, CA 92011	3		1	1		С	
40 CFR Part 433 PSNS	4		1	1		С	
Pretreatment: pH neutralization							2,100
VISTA INDUSTRIAL PRODUCTS. INC.	1 1		1	1		С	
	1 2		1	1 1		C	
1395 Park Center Drive	2		1	1 1 1		C C	
1395 Park Center Drive Vista, CA 92081		1	•	1 1 1		С	
VISTA INDUSTRIAL PRODUCTS, INC. 1395 Park Center Drive Vista, CA 92081 40 CFR Part 433 PSNS PT: Cr reduction, precip & settling, pH neutralization	2 3	1	1 2	1		C C	2,600

Appendix C

Non-Significant Categorical Industrial User Listing

Non-Significant Categorical Industrial Users (NSCIUs)

Anything Liquid Manufacturing, Inc. 2080 Las Palmas Drive, Suite 103 Carlsbad, CA 92011 Category – 40 CFR Part 439

Gematria Products, Inc. 2260 Rutherford Road, Suite 101 Carlsbad, CA 92008 Category – 40 CFR Part 439

Piercan USA, Inc. 180 Bosstick Boulevard San Marcos, CA 92069 Category – 40 CFR Part 428

Sabre Sciences 2233 Faraday, Suite K Carlsbad, CA 92008 Category – 40 CFR Part 439

SenDX Medical 1945 Palomar Oaks Way Carlsbad, CA 92011 Category – 40 CFR Part 433

Seven Manufacturing 1420 Decision Street, Suite C Vista, CA 92081 Category – 40 CFR Part 439

The GHT Companies 2465 Ash Street Vista, CA 92081 Category – 40 CFR Part 439

Appendix D Pretreatment Program Budget

OPERATING EXPENSE SUMMARY: SOURCE CONTROL

PERSONNE	:1	Actual	Budget	Projected	R	ecommended	%
1 2112216148	o Ros	FY2016	FY2017	FY2017		FY2018	Change
5100	Salaries	\$ 353,587	\$ 341,971	\$ 380,845	\$	378,322	11%
5200	Benefits	\$ 134,384	\$ 141,281	\$ 154,896	\$	149,852	6%
	Total Personnel Expenses	\$ 487,971	\$ 483,252	\$ 535,741	\$	528,174	9%

NON-	PERS	ONNEL	Actual FY2016	Budget FY2017	Projected FY2017	1	Recommended FY2018	% Change
40001	5520	Books	\$ -	\$ 250	\$ 250	\$	250	0%
40001	5930	Equipment Replacement	\$ 4,504	\$ 600	\$ 600	\$	600	0%
40001	6120	Fuel & Lube	\$ 1,292	\$ 1,725	\$ 1,500	\$	1,500	-13%
40001	6310	Lab Equipment Repair	\$ 4,461	\$ 4,925	\$ 4,325	\$	5,075	3%
40001	6410	Laundry & Uniforms	\$ 1,514	\$ 1,560	\$ 1,560	\$	1,560	0%
40001	6422	Legal Notices	\$ 390	\$ 750	\$ 750	\$	750	0%
40001	6450	Professional Services	\$ -	\$ 75,000	\$ 75,000	\$	*	~100%
40001	7120	Printing & Reproduction	\$ 451	\$ 500	\$ 500	\$	500	0%
40001	7130	Public Information	\$ 329	\$ 3,000	\$ 3,000	\$	3,000	0%
		Total Non-Personnel Expenses	\$ 12,939	\$ 88,310	\$ 87,485	\$	13,235	-85%

INTERNA	SERVICE FUNDS	Actual FY2016	Budget FY2017	Projected FY2017	F	Recommended FY2018	% Change
11001	Administration	\$ 88,260	\$ 95,409	\$ 78,454	\$	96,509	1%
12001	Laboratory	\$ 46,665	\$ 72,825	\$ 48,473	\$	51,471	-29%
13001	Energy Management	\$ 1,866	\$ 2,074	\$ 1,888	\$	1,879	-9%
	Total Internal Service Fund Expenses	\$ 136,791	\$ 170,308	\$ 128,815	\$	149,859	-12%
	Total Operating Expenses	\$ 637,701	\$ 741,870	\$ 752,041	\$	691,268	-7%

PERSONNEL EXPENSE SUMMARY by PROGRAM

Programs

	2017 Budget		2017 Positions	2018 Budget		2018 Positions	% Change
Encina Water Pollution Control Facility	\$	4,499,068	30.74	\$	4,616,116	32.50	2.6%
Source Control	\$	483,252	3.35	\$	528,174	3,35	9.3%
Agua Hedionda Pump Station	\$	159,078	1.07	\$	167,222	1.07	5.1%
Buena Vista Pump Station	\$	157,398	1.06	\$	172,555	1.15	9.6%
Buena Creek Pump Station	\$	163,324	1.11	\$	159,272	1.00	-2.5%
Carlsbad Water Reclamation Facilities	\$	480,849	3.36	\$	533,058	3.60	10.9%
Raceway Basin Pump Station	\$	121,078	0.83	\$	129,867	0,85	7.3%
Remote Facilities	\$	1,081,727	7.42	\$	1,161,974	7.66	7.4%
Subtotal	\$	6,064,047	41,51	\$	6,306,264	43.51	4.0%
Internal Service Funds	\$	2,180,278	13.53	\$	2,277,015	13.53	4.4%
Subtotal Operating	\$	8,244,325	55.04	\$	8,583,279	57.04	4.1%
Capital Program	\$	2,322,497	12.96	\$	2,402,012	12.96	3.4%
Total Personnel Expense	\$	10,566,822	68.00	\$	10,985,291	70.00	4.0%

PERSONNEL EXPENSE SUMMARY by ACCOUNT

Salaries

	20	2017 Budget		20	018 Budget	% of Total	% Change
Regular	\$	6,445,092		\$	6,718,915		4.2%
Performance Pay	\$	232,466	.,	\$	245,429		5.6%
Overtime	\$	130,000		\$	130,000		0.0%
Holiday	\$	110,295		\$	101,000		-8.4%
Temporary & Part-Time Staff	\$	200,000		\$	120,000		-40.0%
Intern Program	\$	29,757		\$	29,800		0.1%
Shift Differential	\$	44,000		\$	44,000		0.0%
Incentive Awards	\$	14,000		\$	14,000	to the control of the control of the control of	0.0%
Standby	\$	9,809		\$	12,500		27.4%
Subtotal Salaries	\$	7,215,418	68.3%	\$	7,415,644	67.5%	2.8%

Benefits

	2	017 Budget	% of Total	2	018 Budget	% of Total	% Change
CalPERS Retirement Program	\$	1,790,982		\$	1,918,785		7.1%
CalPERS Side Fund Paydown — Final Year	\$	431,835		\$	444,790		3.0%
CalPERS Employee Contribution	\$	(537,090)		\$	(554,234)		3.2%
Other Post-Employment Benefits	\$	36,000		\$	36,000		0.0%
Flexible Benefits 125 Plan	\$	1,064,489		\$	1,126,664		5.8%
Deferred Compensation	\$	255,151		\$	266,106		4.3%
Medicare	\$	108,822		\$	111,816		2.8%
Unemployment	\$	29,993		\$	25,000		-16.6%
Workers Compensation Insurance	\$	133,989		\$	157,751		17.7%
Professional Certification	\$	11,870		\$	11,870		0.0%
Employee Assistance Program	\$	1,917		\$	1,900		-0.9%
General Manager Benefits	\$	7,200		\$	7,200		0.0%
Education Assistance	\$	16,246		\$	16,000		-1.5%
Subtotal Benefits	\$	3,351,404	31.7%	\$	3,569,647	32.5%	6.5%
Total Personnel Expense	\$	10,566,822	100.0%	\$	10,985,291	100.0%	4.0%

Appendix E SNC Publication

PUBLIC NOTICE

INDUSTRIAL USERS IN SIGNIFICANT NON-COMPLIANCE WITH SEWER DISCHARGE REQUIREMENTS

For the period from January 1, 2017 through December 31, 2017, the following INDUSTRIAL USERS, located in the Encina Wastewater Authority service area, were found to be in Significant Non-Compliance for exceeding applicable discharge limits or failing to meet reporting requirements, based on statistical criteria established by EPA and set forth at 40 CFR Part 403.8(f)(2)(viii). For further information please contact Doug Campbell, Encina Wastewater Authority Director of Environmental Compliance at (760) 438-3941, extension 3600.

Industry	Address	Pollutant/Other
McCain Manufacturing, Inc.	2633 Progress Street Vista, CA 92081	Discharging Without a Permit
Metal Etch Services	1165 Linda Vista Drive, Suite #106, San Marcos, CA 92078	Silver
Primarch Manufacturing, Inc.	1211 Liberty Way, Suite A Vista, CA 92083	Acetone