



ENCINA WASTEWATER AUTHORITY

A Public Agency

6200 Avenida Encinas
Carlsbad, CA 92011-1095
Telephone (760) 438-3941
FAX (760) 438-3861 (Plant)
(760) 431-7493 (Admin)

February 28, 2020

Via CIWQS

Ref: EC 20-0042

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 2019 Annual Pretreatment Program Report
Period January 1, 2019 through December 31, 2019**

Dear Joann,

Enclosed please find a copy of the Encina Wastewater Authority Annual Pretreatment Program Report for 2019. 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 *For*
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

2019 ANNUAL PRETREATMENT PROGRAM REPORT

NPDES PERMIT HOLDER AND
SEWER AUTHORITY NAME: Encina Wastewater Authority

REPORT DATE: February 28, 2020

PERIOD COVERED BY THIS REPORT: January 1 – December 31, 2019

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 violations.


Michael Steinlicht
General Manager

Dated: 2/27/2020



Encina Wastewater Authority Annual Pretreatment Program Report

Table of Contents

Program Summary.....	2
Summary of Analytical Results.....	3
Upset, Interference or Pass-through Incidents.....	3
Industrial Users.....	3
Baseline Monitoring Report Requirements.....	4
Enforcement Activities.....	5
Pollution Prevention Plans.....	6
Best Management Practices Program.....	6
Significant Changes in Pretreatment Program Operation.....	7
Summary of Annual Pretreatment Budget.....	8
Public Education.....	8
Biosolids Disposal Methods.....	8

Appendix A – Priority Pollutant Laboratory Data

Appendix B – Significant Industrial User Listing

Appendix C – Non-Significant Categorical Industrial User Listing

Appendix D – Pretreatment Program Budget

Appendix E – SNC Publication

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.

The EWA service area encompasses a population of approximately 379,000 and covers a 125 square mile area. This area is predominantly characterized by residential development. At the end of 2019, the combined industrial flow to the EWPCF and MWRP (0.186 MGD) represented only 0.70% of the total average daily influent to both treatment plants (26.70 MGD). It is anticipated that the percentage of industrial flows will remain low due to a shrinking manufacturing sector and continued residential growth in the service area.

During 2019, 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 2019, EWA had 50 permitted Industrial Users (IUs): 15 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 32 Class III Industrial Users (Non-Significant CIUs, zero-discharge CIUs and other businesses with the potential to impact the Encina System). EWA staff conducted 31 inspections and collected 87 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 2019, 53 Notices of Violation (NOVs) were issued and \$21,700.00 in fines and enforcement costs were assessed. Four of the 21 CIU/SIUs active in the service area during the year were found to be in Significant Non-Compliance (SNC). One industry was in SNC based on a single daily max/monthly average violation and then subsequently ceased operations at that location. 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 third industry has also identified a problem and taken corrective actions to reestablished compliance. The final industry was in SNC in three of the four quarters and has been placed on a Compliance Schedule.

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's renewed NPDES permit became effective on November 1, 2018. With the issuance of the permit, EWA retained the services of Larry Walker Associates to perform a local limits evaluation for both the EWPCF and MWRf. Larry Walker Associates recently submitted draft local limit evaluations for the two plants; the final evaluations are expected in the second quarter of 2020.

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 2019 monthly, quarterly, and semiannual self-monitoring reports for Order No. R9-2018-0059, 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 2019 also met compliance standards.

Industrial Users

At the end of 2019, EWA had 50 permitted IUs: 15 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 32 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 (0.186 MGD) as a percentage of the average daily influent (26.70 MGD) is only 0.70%. It is anticipated that the percentage of industrial flows contributed from CIUs/SIUs will remain low due to a shrinking manufacturing sector and 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

- No new industries in 2019

Changes of Status

- Samtec, Inc. – Carlsbad, California – This business, which is subject to 40 CFR Part 469, Subpart A PSNS, was reclassified from a Class III (R&D) permit to a Class I permit. A new Class I permit was issued in April.

Deletions

- Douglas Technologies Group – Vista, California – This business, which was subject to 40 CFR Part 433 PSNS, relocated all operations to their new facility in Temecula, CA. Production ceased in December; their Class I permit was inactivated in January 2020.
- Nutritional Engineering, Inc. – Vista, California – This business, which was subject to 40 CFR Part 439, Subpart D PSNS, was sold and the new owners relocated all operations to their facility in Ogden, UT. Production ceased in September; their Class I permit was inactivated in October.
- Samtec, Inc. – Carlsbad, California – This business, which was subject to 40 CFR Part 469, Subpart A PSNS, relocated all operations to Samtec facilities located out of state. Production ceased in June; their permit was inactivated in August.

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

Samtec, Inc. was issued a Class I permit in April. They produce Through Glass Via Interposers in glass substrates (wafers) for telecommunication, optical, and medical devices and are subject to 40 CFR Part 469, Subpart A PSNS. Baseline monitoring demonstrated compliance with Electrical and Electronic Components Pretreatment Standards and EWA local limits.

Enforcement Activities

EWA maintains a proactive enforcement stance. During 2019, 53 Notices of Violation (NOVs) were issued and \$21,700.00 in fines and enforcement costs were assessed. Administrative Orders are not an approved element of EWA's Enforcement Response Plan.

Of the 21 SIUs active in the service area during the year, four were found to be in SNC. These industries are discussed below.

Bachem Americas, Inc. had three violations of the federal daily maximum and four violations of the federal monthly average limit for methylene chloride. NOV's issued and \$4,050.00 in fines assessed. Industry was in SNC at the end of the first, second and third quarters for methylene chloride. On July 10, 2019, Bachem Americas was placed on a Compliance Schedule requiring them to develop and implement a comprehensive plan, which will allow them to comply with their permit limitations. Industries' investigation determined that although significant amounts of methylene chloride are used in their manufacturing operations, the processes are closed-loop with minimal opportunities to enter the sewer system. Bachem Americas proposal included eliminating all nonessential access points to sewer and implementing a comprehensive inhouse drain and clarifier monitoring program, so they can identify discharges of methylene chloride and take corrective actions before concentrations exceed discharge limitations. Industries proposal also included an alternate plan to install an activated carbon treatment system if the initial plan failed to resolve the problem. Bachem Americas submitted: (1) Updated plumbing drawing documenting all sealed and active access points to sewer; (2) Waste Disposal procedure; (3) Documentation of employee training; (4) Documentation of drain signage; (5) SOPs for inhouse analysis and sampling of methylene chloride, plus (6) Log books for collecting methylene chloride samples and recording results. All elements of the proposal plus demonstration of full compliance were completed by December 19, 2019. Bachem Americas initiated weekly clarifier monitoring for methylene chloride in September 2019 and started monthly p-trap (drain) monitoring in January 2020. Demonstration of long-term compliance required. If Bachem Americas is unable to achieve consistent compliance with discharge standards, industry will be required to install additional pretreatment as proposed.

Glanbia Nutritionals had one violation of the local limit for zinc, and one violation of the local limit for pH. NOV's issued and \$1,100.00 in fines assessed. Industry was in SNC at the end of the fourth quarter of 2018 for zinc and remained in SNC at the end of the first quarter of 2019. Industry reports that the cause of the zinc and pH were the same as determined for the fourth quarter 2018 violations - employees not following their established cleaning procedures and not using cleaning materials with the prescribed dilution factors. Industry added that previously it appeared to be an isolated incident; but upon further investigation, they discovered a gap in their waste handling process which has since been corrected. Staff were not following the previously developed cleaning SOP "Cell and Corridor Cleaning Procedure (CA)", which requires staff to capture cleaning wastewater and monitor the pH and neutralize the wastewater if

necessary, prior to discharge. Industry returned to full compliance in the second quarter.

Natel Engineering Company, Inc. had one violation of the federal monthly average limit for lead. NOV issued and \$200.00 in fines assessed. Industry determined that one of their cleaning stations had the potential to contribute lead to their wastewater. This wastestream is now collected and hauled for off-site disposal. Industry returned to full compliance in the second quarter.

Nutritional Engineering, Inc. had one violation of the federal daily maximum and two violations of the federal monthly average limit for acetone. NOV's issued and \$450.00 in fines assessed. Industry was in SNC at the end of the first quarter. Industry notes that acetone or IPA are in many of their cleaning products. To help reduce the concentration of acetone in their wastewater, Nutritional Engineering has limited the use of acetone/IPA containing cleaners, and they will haul all mop water for off-site disposal. Additionally, they committed to cleaning SP #1 twice per week. Subsequently, the industry was sold, and the new owners relocated all operations to their facility in Ogden, UT. Production ceased in September; their Class I permit was inactivated in October.

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 525 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.

Sewage Transfer Agreement Between the City of Oceanside and City of Vista

The City of Vista maintains an agreement with the City Oceanside to provide a connection to the City of Vista collection system for wastewater disposal. This connection was activated on June 22, 2017. For 2019, the City of Oceanside discharged an average of 1.3 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 connection will be made permanent. The agreement requires the City of Oceanside to administer EWA's local limits and pretreatment ordinance and allows for a maximum average daily flow of 2.15 MGD.

The area contributing wastewater to the City of Vista is characterized as mainly residential with light commercial and previously one Significant Industrial User, Tri City Medical Center. The City of Oceanside had categorized this facility as a Non-Categorical Significant Industrial User but reclassified the facility in June 2019 and removed them from their Pretreatment Program. The facility was regulated under the City of Oceanside's local limits and was required to perform semiannual self-monitoring events. No violations of the City of Oceanside or the Encina Wastewater Authority's (EWA) local limits were identified for the first half of 2019. The City of Oceanside reports that there were no additional Significant Industrial Users active in the service area contributing to the City of Vista for the remainder of CY 2019.

Summary of Annual Pretreatment Budget

In FY 2020, EWA's Pretreatment Program budget totaled \$930,472. (The amount budgeted may vary slightly from actual expenditures.) This reflects approximately a 24% increase from the amount budgeted during FY 2019. This can be attributed to the addition of a third permanent inspector position, plus funds budgeted under Professional Services to complete EWA's local limits evaluation. The funds were available in FY 2019 but were not reflected in that year's budget. As noted above, the number of staff members increased from three to four. A line item detail of the budget is attached for reference in Appendix D.

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. In 2019, EWA initiated multiple plant enhancement and rehabilitation projects, which includes Digester Improvements and Rehabilitation, Primary Area Improvements and Rehabilitation, Cogeneration Building Structural Repair, and Network Improvements. Due to the ongoing construction projects, EWA temporarily halted public tours starting in September 2019. Tours will reinstate upon completion of the various projects.

EWA also participates in other community outreach activities. In 2019, 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, and Alta Vista Gardens Earth Day. 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, 2019.

Biosolids Disposal Methods

In 2019, EWA produced approximately 6,970.21 Dry Metric Tons (DMT) of Class A and Class B biosolids. Most of this material (5,710.55 DMT) was transported by Ag Tech, LLC and Denali Water Solutions to farms in Yuma and Somerton, Arizona for land application. 393.44 DMT were landfilled, and the remainder (866.22 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.

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.

Appendix A

Priority Pollutant Laboratory Data

Appendix B

Significant Industrial User Listing

ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
BACHEM AMERICAS, INC	1			3	4	SNC	
1271 Avenida Chelsea	2		2	2	3	SNC	
Vista, CA 92081	3		1	2		SNC	
40 CFR Part 439, Subpart C PSNS	4	1	1	1			
Pretreatment: settling, pH neutralization, hauling							2,100
<p>Three violations of the federal daily maximum and four violations of the federal monthly average limit for methylene chloride. NOV's issued and \$4,050.00 in fines assessed. Compliance Schedule issued 7/10/2019; see Enforcement Activities section of the Annual Pretreatment Report for additional details.</p>							
CARLSBAD TECHNOLOGY, INC.	1	1	2	2		C	
5923 Balfour Court	2		2	2		C	
Carlsbad, CA 92008	3		2	2		C	
40 CFR Part 439, Subpart D PSNS	4		2	2		C	
Pretreatment: pH neutralization							700
CINTAS CORPORATION	1		1	2		C	
460 West California Avenue	2		1	1		C	
Vista, CA 92084	3	1	1	1		C	
Industrial Laundry - Local Limits	4		1	1		C	
Pretreatment: settling, dissolved air flotation							60,000

ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
DOUGLAS TECHNOLOGIES GROUP	1		1			C	
1340 North Melrose Drive	2					C	
Vista, CA 92083	3					C	
40 CFR Part 433 PSNS	4	1		1		C	
Pretreatment: hauling and evaporation							40*
<p>Industry only had two batch discharges of regulated industrial wastewater to sewer in CY 2019. EWA monitored the initial batch discharge on 1/4/2019, and the industry monitored second batch discharge on 12/9/2019. Industry relocated all operations to a new facility in Temecula, CA. Production ceased in early December and their final batch discharge occurred on 12/9/2019. Required TTO certifications submitted. Industries' permit has been inactivated. *Industry anticipates discharging an annual average of 40 gallons per production day in batch discharges up to 2,500 gallons.</p>							
GLANBIA NUTRITIONALS	1		2	1	2	SNC	
2840 Loker Avenue East, Suite #101	2		1	2		C	
Carlsbad, CA 92010	3		2	1		C	
40 CFR Part 439, Subpart D PSNS	4	1	1	1		C	
Pretreatment: pH neutralization, settling/clarifier							220
<p>One violation of the local limit for zinc, and one violation of the local limit for pH. NOV's issued and \$1,100.00 in fines assessed. See Enforcement Activities section of the Annual Pretreatment Report for additional details.</p>							
HOLLANDIA DAIRY, INC.	1		1	1		C	
622 East Mission Road	2	1	1	1		C	
San Marcos, CA 92069	3		1	1		C	
Dairy & Creamery - Local Limits	4		1	1		C	
PT: flow equalization, pH neutralization, MBBRs, DAF							38,000

ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
HRE PERFORMANCE WHEELS	1	1	1	1	1	NC	
2611 Commerce Way, Suite D	2	1	1	1	1	NC	
Vista, CA 92081	3	1	1	2	1	NC	
40 CFR Part 433 PSNS	4	1	1	1		C	
Pretreatment: hauling, recycling							100
<p>One violation of the federal monthly average limit for copper, one violation of the local limit for pH, plus one violation of the local limit for O&G. NOVs issued and \$1,400.00 in fines assessed. Industry notes they unable to identify the exact source of the copper violation, but they suspect the constant recycling of tumbling process wastewater has produced a build-up of copper which is carrying over to the rinse table and discharging to SP #1. To prevent future violations, the tumbling system has been recharged with fresh solution. The O&G violation was attributed to air compressor condensate discharging to SP #1. This unregulated wastestream has since been redirected downstream of SP #1. Industry was unable to identify the source of the low pH violation. Industry has returned to compliance for all three parameters. Required TTO certifications submitted.</p>							
HUGHES CIRCUITS, INC.	1		1	3		C	
540 South Pacific Street	2		2	2		C	
San Marcos, CA 92078	3	1	1	3		C	
40 CFR Part 433 PSNS	4	1	2	2		C	
Pretreatment: pH adjustment, precipitation & settling							12,500
<p>Required TTO certifications submitted.</p>							
IONIS PHARMACEUTICALS	1					C	
2282 Faraday Avenue	2	1				C	
Carlsbad, CA 92008	3					C	
40 CFR Part 439, Subpart C PSNS	4					C	
Pretreatment: hauling							0
<p>Commercial manufacturing of Spinraza concluded 7/31/2018; commercial manufacturing of Waylivra was anticipated to commence in late 2019 but ultimately didn't occur. No discharge of federally regulated waste during the 2019 calendar year.</p>							

ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
J&D LABORATORIES, INC.	1		1	3	1	NC	
2710 Progress Street	2		1	1		C	
Vista, CA 92081	3		2	1		C	
40 CFR Part 439, Subpart D PSNS	4	1	1	1		C	
PT: pH neutralization, settling/clarifier, oil skimmer							12,100
<p>One violation of the local limit for O&G. NOV issued and \$1,100.00 in fines assessed. Industry determined that they were not operating their clarifier correctly. The clarifier manufacture has instructed the industry to refill their unit with fresh water following pump outs and prior to introducing any influent to the clarifier. This will allow the system to properly separate the pollutants from the wastewater. Subsequent O&G analysis have demonstrated compliance.</p>							
McCain Manufacturing, Inc.	1		1	1		C	
2633 Progress Street	2	1	1	1		C	
Vista, CA 92081	3			1		C	
40 CFR Part 433 PSNS	4		1	2		C	
Pretreatment: settling/clarifier, OWS, pH neutralization							150
<p>Required TTO certifications submitted.</p>							
Metal Etch Services	1		1	1		C	
1165 Linda Vista Drive, Suite #106	2		1	1		C	
San Marcos, CA 92078	3		1	1		C	
40 CFR Part 433 PSNS	4	1	1	1		C	
Pretreatment: pH neutralization, hauling							360
<p>Required TTO certifications submitted</p>							

**ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019**

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
NATEL ENGINEERING COMPANY, INC.	1		1	1	1	SNC	
6350 Palomar Oaks Court	2	1	1	1		C	
Carlsbad, CA 92011	3		1	2		C	
40 CFR Part 433 PSNS	4		1	1		C	
Pretreatment: hauling							2,400
One violation of the federal monthly average limit for lead. NOV issued and \$200.00 in fines assessed. Required TTO certifications submitted. See Enforcement Activities section of the Annual Pretreatment Report for additional details.							
NATURAL ALTERNATIVES INTERNATIONAL	1		2	2		C	
1215 Park Center Drive	2		2	2		C	
Vista, CA 92081	3	1	4	2		C	
40 CFR Part 439, Subpart D PSNS	4		2	4		C	
Pretreatment: settling/clarifier							2,860
NUTRITIONAL ENGINEERING, INC.	1	1	1	1	2	SNC	
1208 Avenida Chelsea	2		1	3	1	NC	
Vista, CA 92081	3	2	1			C	
40 CFR Part 439, Subpart D PSNS	4						
Pretreatment: hauling & pH neutralization							250
One violation of the federal daily maximum and two violations of the federal monthly average limit for acetone. NOV's issued and \$450.00 in fines assessed. See Enforcement Activities section of the Annual Pretreatment Report for additional details.							

**ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019**

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		C	
1211 Liberty Way, Suite A	2		1	2		C	
Vista, CA 92083	3	1	1	2	1	NC	
40 CFR Part 439, Subpart D PSNS	4		1	3		C	
Pretreatment: settling/clarifier, oil & grease removal							800
<p>One violation of the local limit for pH. NOV issued and \$100.00 in fines assessed. Primarch's investigation determined that the pH violation was caused by staff failing to cover drains while blending powders. During August 2019, industry notes that they were blending large volumes of milk protein, which would contribute to the low pH issue. To prevent future violations, blending staff have received additional training, and QC is now required to check that drains are covered before giving clearance to blend, plus drain covers are checked during their hourly walk throughs.</p>							
PRUDENTIAL OVERALL SUPPLY	1		1	1		C	
2485 Ash Street	2		1	1		C	
Vista, CA 92081	3		1	1		C	
Industrial Laundry - Local Limits	4	1	1	1		C	
PT: flow equalization, pH neutralization, settling, DAF							47,000
SAMTEC, INC.	1	1					
2726 Loker Avenue West	2		1	1		C	
Carlsbad, CA 92010	3	1				C	
40 CFR Part 469, Subpart A PSNS	4						
Pretreatment: pH neutralization and hauling							600
<p>Facility reclassified from Class III (R&D) to Class I under 40 CFR 469.18 (PSNS). Class I permit issued 4/3/2019. Industry subsequently relocated all operations to out of state Samtec facilities. Industry ceased discharge of federally regulated wastewater on 6/10/2019; the property was vacated by the end of August 2019. Industries' permit has been inactivated.</p>							

**ANNUAL PRETREATMENT PROGRAM REPORT
01/01/2019 - 12/31/2019**

Encina Wastewater Authority	Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
SEASPINE, INC.	1		1	2		C	
5770 Armada Drive	2		1	1		C	
Carlsbad, CA 92008	3	1	1	1		C	
40 CFR Part 433 PSNS	4		1	1		C	
Pretreatment: hauling							250
Required TTO certifications submitted.							
SELECT SUPPLEMENTS, INC.	1	1	1	3	2	NC	
2390 Oak Ridge Way	2		1	1		C	
Vista, CA 92081	3	1	1	1		C	
40 CFR Part 439, Subpart D PSNS	4		1	1		C	
Pretreatment: settling/clarifier							3,000
One violation of the local limit for BOD and one violation of the local limit for O&G. NOV's issued and \$350.00 in fines assessed. Industry reports they were unable to identify a cause for the BOD and O&G violations. In response, industry cleaned their clarifier and subsequent monitoring has demonstrated compliance. To prevent future violations, industry now has their clarifier cleaned monthly.							
VERSUM MATERIALS US, LLC.	1	1	1	1		C	
1969 Palomar Oaks Way	2		1	1		C	
Carlsbad, CA 92011	3	2	1	1		C	
40 CFR Part 433 PSNS	4		1	1		C	
Pretreatment: pH neutralization							3,000
Required TTO certifications submitted.							

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

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

PERSONNEL

		Actual FY2018		Budget FY2019		Projected FY2019		Recommended FY2020	%
									Change
5100	Salaries	\$ 384,261	\$	415,115	\$	407,340	\$	474,304	14%
5200	Benefits	\$ 166,872	\$	149,563	\$	170,314	\$	233,718	56%
Total Personnel Expenses		\$ 551,133	\$	564,678	\$	577,654	\$	708,022	25%

NON-PERSONNEL

		Actual FY2018		Budget FY2019		Projected FY2019		Recommended FY2020	%
									Change
40001	5520 Books	\$ -	\$	250	\$	250	\$	300	20%
40001	5930 Equipment Replacement	\$ 29	\$	3,300	\$	350	\$	1,900	-42%
40001	6120 Fuel & Lube	\$ 1,332	\$	1,750	\$	2,000	\$	2,100	20%
40001	6310 Lab Equipment Repair	\$ 3,833	\$	5,200	\$	5,200	\$	10,100	94%
40001	6330 Lab Supplies	\$ -	\$	750	\$	750	\$	750	0%
40001	6410 Laundry & Uniforms	\$ 1,535	\$	1,600	\$	1,595	\$	1,850	16%
40001	6422 Legal Notices	\$ 554	\$	1,500	\$	750	\$	1,500	0%
40001	6450 Professional Services	\$ -	\$	-	\$	-	\$	30,000	0%
40001	7120 Printing & Reproduction	\$ -	\$	500	\$	500	\$	500	0%
40001	7130 Public Information	\$ 43	\$	3,000	\$	3,000	\$	3,000	0%
Total Non-Personnel Expenses		\$ 7,326	\$	17,850	\$	14,395	\$	52,000	191%

INTERNAL SERVICE FUNDS

		Actual FY2018		Budget FY2019		Projected FY2019		Recommended FY2020	%
									Change
11001	Administration	\$ 84,002	\$	97,396	\$	94,645	\$	113,076	16%
12001	Laboratory	\$ 48,029	\$	71,275	\$	49,990	\$	55,194	-23%
13001	Energy Management	\$ 1,810	\$	1,879	\$	2,017	\$	2,180	16%
Total Internal Service Fund Expenses		\$ 133,841	\$	170,550	\$	146,652	\$	170,450	0%

Total Operating Expenses		\$ 692,300	\$	753,078	\$	738,701	\$	930,472	24%
---------------------------------	--	-------------------	-----------	----------------	-----------	----------------	-----------	----------------	------------

PERSONNEL EXPENSE SUMMARY *by* ACCOUNT**Salaries**

	2019 Budget	% of Total	2020 Budget	% of Total	% Change
Regular	\$ 7,365,598		\$ 7,748,544		5.2%
Overtime	\$ 130,000		\$ 130,000		0.0%
Holiday	\$ 95,000		\$ 95,000		0.0%
Temporary & Part-Time Staff	\$ 250,000		\$ 175,000		-30.0%
Intern Program	\$ 29,800		\$ 29,800		0.0%
Shift Differential	\$ 38,060		\$ 39,000		2.5%
Incentive Awards	\$ 14,000		\$ 14,000		0.0%
Standby	\$ 9,000		\$ 2,000		-77.8%
Subtotal Salaries	\$ 7,931,459	69.2%	\$ 8,233,344	68.4%	3.8%

Benefits

	2019 Budget	% of Total	2020 Budget	% of Total	% Change
CalPERS Retirement Program — Normal Cost	\$ 1,456,815		\$ 1,554,716		6.7%
CalPERS Retirement Unfunded Liability	\$ 740,618		\$ 870,900		17.6%
CalPERS Employee Contribution	\$ (582,060)		\$ (611,946)		5.1%
Other Post-Employment Benefits	\$ 79,150		\$ 87,061		10.0%
Flexible Benefits 125 Plan	\$ 1,197,069		\$ 1,234,645		3.1%
Deferred Compensation	\$ 281,889		\$ 293,142		4.0%
Medicare	\$ 120,141		\$ 125,116		4.1%
Unemployment	\$ 20,000		\$ 12,000		-40.0%
Workers Compensation Insurance	\$ 181,000		\$ 201,000		11.0%
Professional Certification	\$ 10,000		\$ 10,000		0.0%
Employee Assistance Program	\$ 1,900		\$ 1,900		0.0%
General Manager Benefits	\$ 7,200		\$ 7,200		0.0%
Education Assistance	\$ 16,000		\$ 16,000		0.0%
Subtotal Benefits	\$ 3,529,723	30.8%	\$ 3,801,734	31.6%	7.7%
Total Personnel Expense	\$ 11,461,182	100.0%	\$ 12,035,079	100.0%	5.0%

PERSONNEL EXPENSE SUMMARY *by* PROGRAM

Programs

	2019 Budget	2019 Positions	2020 Budget	2020 Positions	% Change
Encina Water Pollution Control Facility	\$ 4,772,394	32.10	\$ 4,800,204	32.52	0.6%
Source Control	\$ 564,678	3.35	\$ 708,022	4.35	25.4%
<i>Agua Hedionda Pump Station</i>	\$ 181,796	1.16	\$ 279,345	1.71	53.7%
<i>Buena Vista Pump Station</i>	\$ 196,550	1.24	\$ 206,566	1.24	5.1%
<i>Buena Creek Pump Station</i>	\$ 181,006	1.12	\$ 190,259	1.12	5.1%
<i>Carlsbad Water Reclamation Facilities</i>	\$ 553,227	3.52	\$ 562,215	3.38	1.6%
<i>Raceway Basin Pump Station</i>	\$ 147,429	0.93	\$ 154,951	0.93	5.1%
Remote Facilities	\$ 1,260,008	7.97	\$ 1,393,336	8.38	10.6%
Subtotal	\$ 6,597,080	43.43	\$ 6,901,562	45.25	4.6%
Internal Service Funds	\$ 2,353,388	13.36	\$ 2,468,421	12.54	4.9%
Subtotal Operating	\$ 8,950,468	56.79	\$ 9,369,983	57.79	4.7%
Capital Program	\$ 2,510,714	13.21	\$ 2,665,096	13.21	6.1%
Total Personnel Expense	\$ 11,461,182	70.00	\$ 12,035,079	71.00	5.0%

Appendix E
SNC Publication

PUBLIC NOTICE

INDUSTRIAL USERS IN SIGNIFICANT NON-COMPLIANCE WITH SEWER DISCHARGE REQUIREMENTS

For the period from January 1, 2019 through December 31, 2019, 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
Bachem Americas, Inc.	1271 Avenida Chelsea Vista, CA 92081	Methylene Chloride
Glanbia Nutritionals	2840 Loker Avenue East, #101 Carlsbad, CA 92010	Zinc
Natel Engineering Company, Inc.	6350 Palomar Oaks Court Carlsbad, CA 92011	Lead
Nutritional Engineering, Inc	1208 Avenida Chelsea Vista, CA 92081	Acetone