

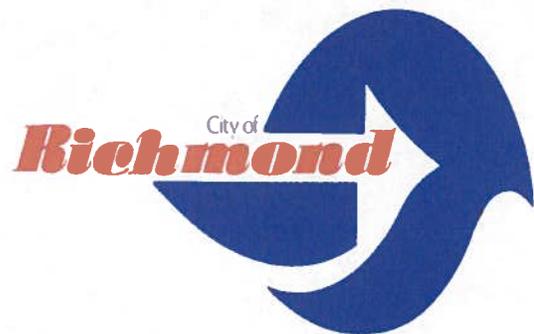
FEBRUARY 26, 2014

CITY OF RICHMOND

Annual Pretreatment Report - 2013

submitted to

REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION



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A. COVER SHEET

NPDES Permit Holder or Sewer Authority Name: West County Agency

Report Date: February 26, 2014

Period Covered by This Report: from 01/01/2013 to 12/31/2013

Period Covered by Previous Report: from 01/01/2012 to 12/31/2012

Name of Wastewater Treatment Plant(s) *National Pollutant Discharge Elimination System (NPDES) Permit Number*

City of Richmond Wastewater Treatment Plant *CA0038539*
601 Canal Boulevard, Richmond, CA 94804

Person to contact concerning information contained in this report:

Name: ***Chad Davisson***
Title: ***General Manager, Richmond Municipal Sewer District***

Mailing Address: ***450 Civic Center Plaza***
Richmond, CA 94804

Telephone No: ***(510) 620-5486***

"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."

2/26/14
Date

Chad Davisson
Chad Davisson
General Manager

PRETREATMENT

1. 2013

10/1/13

B. INTRODUCTION

This annual report has been prepared by the City of Richmond in accordance with the "Requirements for Pretreatment Annual Reports" as outlined in Appendix H-1 to NPDES permit No. CA0038539 (Order R2-2013-0016) issued to the West County Agency (WCA), [a joint powers agreement with the City of Richmond Municipal Sewer District] that became effective July 1, 2013.

The discharge is also regulated under Order No. R2-2012-0096 (NPDES Permit No. CA0038849), which establishes requirements on mercury and polychlorinated biphenyls (PCBs) from wastewater discharges in the region.

The City of Richmond and the Richmond Municipal Sewer District own the Richmond Municipal Sewer District Water Pollution Control Plant (Richmond Plant) located at 601 Canal Blvd, Richmond, CA 94804. The Richmond Municipal Sewer District facilitates the allocation of sewer use fees paid by City of Richmond residents. The City handles administrative, management, and source control responsibilities and contracts out the operations and maintenance of the Richmond Plant and the sewer collection system. A private operations firm, Veolia Water West Operating Services, Inc., operates the Richmond Plant and the collection system under contract and direction of the City of Richmond.

It has a design capacity of 16 MGD for dry weather and a hydraulic capacity of 20 MGD for wet weather conditions. Chlorinated effluents from the West County Plant and the Richmond Plant are combined and dechlorinated prior to discharge from the West County Agency Common Outfall into San Francisco Bay.

The wastewater treatment processes at the Richmond Plant consist of bar screens, grit removal chambers, primary clarifiers, activated sludge basins, secondary clarifiers, and chlorine contact basins

Biosolids from the Richmond Plant are thickened by dissolved air floatation, anaerobically digested, and pumped to the West County Plant for drying and disposal. At the West County Plant, primary clarifier sludge is combined with secondary clarifier sludge that has been thickened using dissolved air floatation, anaerobically digested, and dewatered in drying beds. Dried sludge from both plants is hauled offsite for disposal at Keller Canyon Landfill, West Contra Costa Landfill, or Vasco Road Landfill.

The Richmond Plant serves a population of approximately 68,000 covering most of the incorporated area of Richmond. West County Wastewater District has jurisdiction over Industries and sewers in the northerly portion. Stege Sanitary District has control over the sewers and East Bay Municipal Utility District has control over the industries in the southeast. The City's sewer flow is approximately 70% domestic, 20% commercial, and 10% industrial.

The data contained in this report is based on the (updated) Significant Industrial User

(SIU) list for 2013 (Appendix G-2). The list in last year's annual report contained fourteen (14) Industrial Dischargers (Appendix G-3).

However, after further investigation (due to inspections and data review), it was revised and now only contains ten (10) Industrial Dischargers. Five (5) of those SIUs listed are categorical. Of the five (5) categorical industries listed, one (1) is a Zero Discharger. This list is reviewed twice a year and is updated as needed. (See "Section G – Updated List of Regulated SIUs" for more detail).

Current Permit Status

The current permit was adopted on May 8, 2013 and became effective on July 1, 2013. It expires on June 30, 2018.

Pretreatment Audits, Inspections, etc.

The City administers the pretreatment program in-house. A more detailed discussion of these items is in Section J, "Pretreatment Program Changes".

Date of Last PCA or PCI Report

The date of the last PCA was December 3 – 5, 2012. The report on the results of the PCA was received on April 2, 2013.

The date of the last PCI was December 14, 2010. The report on the results of the PCI was received on April 8, 2011.

Date of Response to PCA or PCI Report

A response was provided for the PCA on May 31, 2013.

A response was provided for the PCI on May 23, 2011.

C. DEFINITIONS

Categorical Industrial User (CIU) shall mean industrial activity performed at the facility is regulated by one or more of the federal regulations found in Title 40 Code of Federal Regulations (40 CFR) Parts 401 - 424 and 425 – 471. The facility discharges *process* wastewater to a publicly owned treatment works (POTWs). In the EPA Pretreatment Categories and Standards, the categorical activity is assigned pretreatment limitations, reporting requirements, or both.

Compliance shall mean adherence to limits and provisions of the local Waste Water Ordinance and, if applicable, federal categorical regulations.

Consistent Compliance shall mean compliance in all inspections, monitoring, and reports during a given period.

Inconsistent Compliance shall mean failure to be in compliance in all inspections, monitoring, and reports during a given period which does not satisfy the criteria of significant noncompliance.

Interference shall mean a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- (i) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- (ii) 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.

Pass Through shall mean a Discharge which exits the POTW into waters of the United States 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 POTW's NPDES permit (including an increase in the magnitude or duration of a violation).

Significant Industrial User. Except as provided in 40 CFR 403.3(v)(2) and 40 CFR 403.3(v)(3) shall mean:

- i. All Industrial Users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N
- ii. All Industrial Users that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater)
- iii. All Industrial Users that contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant
- iv. All Industrial Users that are designated as such by the Control Authority on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Significant Non-compliance shall mean:

- i. Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(l)

- ii. Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH)
- iii. Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW 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)
- iv. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph 403.8 (f)(1)(vi)(B) to halt or prevent such a discharge
- v. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance
- vi. Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules
- vii. Failure to accurately report noncompliance
- viii. Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

Upset shall mean an exceptional incident in which there is unintentional and temporary non-compliance with categorical Pretreatment Standards, because of factors beyond the control of the IU. It does not include non-compliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

Slug Load or Slug Discharge shall mean any discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards of Richmond Municipal Code. 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 POTW's regulations, Local Limits or Permit conditions.

D. DISCUSSION OF UPSET, INTERFERENCE AND PASS THROUGH

During this reporting period there were no recorded plant upsets due to industrial discharges.

E. INFLUENT, EFFLUENT, AND BIOSOLIDS MONITORING RESULTS

2013 JULY - DECEMBER TOXICS POLLUTANTS SUMMARY SAMPLING PROCEDURES

Sample details are outlined in the table below:

Sample Location	Date Sampled	Time Sampled	Date to Lab	Time to Lab	Parameter	Preservative	Sample Type
INF-002	N.S.				Semi-volatile organics (625)	4 °C	Grab
EFF-002	N.S.				Semi-volatile organics (625)	4 °C	Grab
INF-002	09/11/13	12:50	09/11/13	15:06	Volatile organics (624)	4 °C	Grab
EFF-002	09/11/13	13:16	09/11/13	15:06	Volatile organics (624)	4 °C	Grab
INF-002	N.S.				Organochlorine pesticides (608)	4 °C	Grab
EFF-002	09/11/13	13:25	09/13/13	09:50	Organochlorine pesticides (608)	4 °C	Grab
INF-002	09/11/13	07:33	09/13/13	09:50	Metals	HNO ₃ & 4 °C	Composite
EFF-002	09/11/13	07:43	09/13/13	09:50	Metals	HNO ₃ & 4 °C	Composite
INF-002	09/11/13	12:80	09/11/13	15:06	Mercury ^{1 2}	HNO ₃ & 4 °C	Grab
EFF-002	09/11/13	13:16	09/11/13	15:06	Mercury	HCl & 4 °C	Grab
INF-002	09/11/13	07:33	09/11/13	15:06	Selenium	HNO ₃ & 4 °C	Composite
EFF-002	09/11/13	07:43	09/11/13	15:06	Selenium	HNO ₃ & 4 °C	Composite
INF-002	09/11/13	12:50	09/13/13	09:50	Cyanide	NaOH & 4 °C	Grab
EFF-002	09/11/13	13:25	09/13/13	09:50	Cyanide	NaOH & 4 °C	Grab

N.S. – Not Sampled

Final effluent was collected after chlorination but before de-chlorination because it is not de-chlorinated until mixed with WCWD final effluent.

1 Method 1669, "Method for Sampling Ambient Water for Determination of Metals at EPA Ambient Criteria Levels," U.S. Environmental Protection Agency, Office of Water, Office of Science and Technology, Engineering and Analysis Division (4303), 401 M Street SW, Washington, DC 20460, April 1995 with January 1996 revisions.

2 This Method follows the EPA Environmental Methods Management Council's "Guidelines and Format for Methods to Be Proposed at 40 CFR, part 136 or part 141."

METHOD OF SAMPLE DE-CHLORINATION

Final effluent was not de-chlorinated before sending it to the laboratory for analysis.

SAMPLE COMPOSITING

Metals samples were collected with flow-proportioned automatic composite samplers. The effluent sample for Mercury (ultra-clean) is taken as a grab (as required per standard methods).

The other samples were not composited, as required.

DATA VALIDATION

Internal standards, spikes, duplicates, and blanks are not included with this report. However, all QA/QC data are attached with the lab results (included in Appendices E-1, E-2 and E-3). Based on the QA/QC validation data, the analytical results reviewed meet the laboratory acceptance criteria except as noted in the footnotes.

RESULTS

The tabular data is included in the body of this report. Detailed lab results are located in the attachments listed:

- Appendix E-1: Influent and Effluent Lab Results for, Metals, PCBs and Cyanide
Appendix E-2: Influent and Effluent Lab Results for Volatile Organics, Selenium, and Mercury
Appendix E-3: Transport Sludge Results

The WCA's new NPDES permit (Order R2-2013-0016) limits became effective July 1, 2013. The following parameters were detected in the City of Richmond secondary effluent but not at any amounts to violate or trigger any regulatory responses:

PARAMETER	DATE SAMPLED	INFLUENT RESULTS (µg/l)	EFFLUENT RESULTS (µg/l)	REGIONAL PERMIT LIMIT (µg/l), WQO/WQC
Chloroform	09/11/13	7.7	2.6	No Criteria
Bromodichloromethane	09/11/13	N.D. (2.5)	1.2	46
Dibromochloromethane	09/11/13	N.D. (2.5)	0.4 J	34
Methylene Chloride	09/11/13	N.D. (2.5)	0.49 J	No Criteria
Toluene	09/11/13	2.6	0.9	200,000
Ammonia (as N)	09/11/13	Not Sampled	26 mg/l	32 mg/l
Arsenic	07/10/13	4.2	3.1	36.0
Chromium	07/10/13	4.4	2.3	
Copper	09/11/13	53	5.7	4.2
Mercury	07/10/13	0.13	0.081	0.025
Nickel	07/10/13	7.7	4.3	13
Selenium	03/14/13	1.10	0.45 J	5.0
Zinc	12/11/13	140	27	86

DISCUSSION OF RESULTS

No pollutant in this sample was detected in sufficient concentration to upset, interfere, or pass through the POTW. Based on the City's Industrial User monitoring, chloroform, bromodichloromethane, 1, 2-dichloropropane, 1, 1, 1-trichloroethane, toluene, methylene chloride, and other detectable levels of toxic organics could occur in the influent.

Industrial User's operating procedures are reviewed during routine inspections to determine if best management practices are not being followed. With the exception of Bay Area Rapid Transit's slug discharge in July, no other incidents from Industrial Users were reported nor suspected during this period.

The City monitors industrial and commercial sources as part of our Pollution Prevention Program. Although BART had several violations for metals in 2013 (slug discharges) there were no POTW discharge violations for any non-conventional pollutants during this reporting period.

The NPDES permit limits are enforced at West County Agency's combined effluent monitoring point. A percentage of all parameters detected in the influent and ending up in the sludge may originate from infiltration of ground water containing legacy pollutants into the City's sanitary sewer collection system, and privately owned sanitary sewer laterals. The City has ongoing Capital Improvement Projects underway to repair and upgrade the sanitary sewer, in conjunction with a private lateral repair program. Based on the City's Industrial User monitoring, chloroform, bromodichloromethane, 1, 2-dichloropropane, 1, 1, 1-trichloroethane, toluene, methylene chloride, and other detectable levels of toxic organics could occur in the influent. Industrial User's operating procedures are reviewed during routine inspections to determine if best management practices are not being followed.

It is believed that the majority of the mercury present in the City's influent is from inflow and infiltration into the sanitary collection system. The mercury in the groundwater is a legacy pollutant from ship building, blasting cap manufacturing and petroleum refining, and in conjunction with other collection system capital improvements, ensuring private laterals are in good operating condition will reduce the loading of this pollutant.

The City's Dental offices/practices are inspected once every three years. This is to ensure that all of these facilities have Mercury-Amalgam separators in place and they are operating effectively.

All Dental Facilities are scheduled to be inspected in 2014.

INFLUENT METALS CONCENTRATIONS:

CITY OF RICHMOND
TABLE 1a METAL CONCENTRATIONS OF INFLUENT

Date	Year	MGD	Sample Date	ARSENIC	CADMIUM	CHROMIUM	COPPER	CYANIDE	LEAD	MERCURY	NICKEL	SELENIUM	SILVER	ZINC
				ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
January	2013	7.31	10-Jan	3.4	J 0.31	2.9	31	ND 3.0	3.0	0.07	5.4	J 0.62	J 0.35	120
February	2013	6.36	14-Feb	ND 4.5	J 1.0	5.1	71	ND 3.0	8.4	0.24	5.4	1.0	J 0.75	240
March	2013	5.88	14-Mar	2.9	J 0.53	2.9	62	ND 3.0	3.9	0.26	5.9	1.10	1.3	150
April	2013	4.83	17-Apr	2.0	J 0.44	3.1	54	ND 3.0	4.1	0.071	6	J 0.58	J 0.47	140
May	2013	5.31	15-May	2.9	J 1.20	4.4	63	ND 3.0	5.9	0.24	8.9	J 0.37	J 0.54	180
June	2013	5.71	12-Jun	3.1	J 0.88	4.2	65	ND 3.0	7.8	0.11	7.6	J 0.66	J 0.61	210
July	2013	5.64	10-Jul	4.2	0.60	4.4	64	ND 3.0	5.6	0.13	7.7	1.0	J 0.47	220
August	2013	5.58	8-Aug	3.3	J 1.0	ND 0.9	64	ND 3.0	7.7	0.16	7.9	J 0.60	J 0.40	240
September	2013	5.35	11-Sep	3.0	J 0.78	J 5.1	53	ND 3.0	4.1	0.091	6.1	J 0.58	ND 0.5	150
October	2013	5.32	10-Oct	2.5	ND 1.3	3.9	65	ND 3.0	7.6	0.091	10	0.81	ND 2.5	230
November	2013	4.84	12-Nov	J 3.2	J 2	J 3.9	79	ND 3.0	7	0.28	8.3	0.79	ND 2.5	230
December	2013	5.10	11-Dec	1.8	J 0.40	J 4.2	40	ND 3.0	3.5	0.16	5.2	J 0.85	ND 0.5	140
Maximum				4.50	2.00	5.10	79.0	3.00	8.40	0.28	10.00	1.10	2.50	240
Minimum				1.80	0.31	0.90	31.0	3.00	3.00	0.07	5.20	0.37	0.35	120
Average				3.07	26.89	3.75	59.3	3.00	5.72	0.16	7.03	0.75	0.91	188

A "J" flagged result indicates an estimated concentration above the Method Detection Limit (MDL) and below RL/ML (Reporting Limit/Minimum Level)
The "J" flag is equivalent to the DNQ Estimated Concentration Flag.

EFFLUENT METALS CONCENTRATIONS:

CITY OF RICHMOND
SECONDARY EFFLUENT METAL CONCENTRATIONS

Date	Year	MGD	Sample Date	ARSENIC	CADMIUM	CHROMIUM	COPPER	CYANIDE	LEAD	MERCURY	NICKEL	SELENIUM	SILVER	ZINC
				ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
January	2013	7.14	10-Jan	2.2	ND 0.10	ND 0.90	2.8	ND 3.0	J 0.29	0.0180	3.1	J 0.28	J 0.32	18
February	2013	6.03	14-Feb	2.1	ND 0.20	ND 1.80	2.7	ND 3.0	ND 0.40	0.0056	2.5	J 0.42	ND 0.20	16
March	2013	5.65	14-Mar	1.9	ND 0.10	1.1	1.9	ND 3.0	J 0.25	0.0051	3.7	J 0.45	ND 0.10	15
April	2013	4.99	17-Apr	1.8	ND 0.10	2.20	2.5	ND 3.0	J 0.22	0.004	3.4	J 0.2	ND 0.10	11
May	2013	5.45	15-May	2.2	ND 0.10	ND 0.90	3.3	ND 3.0	J 0.33	0.0002	3.6	ND 0.06	ND 0.10	19
June	2013	5.55	12-Jun	2.7	ND 0.10	ND 0.90	2.1	ND 3.0	J 0.30	0.015	3.6	J 0.14	ND 0.10	18
July	2013	5.78	10-Jul	3.1	ND 0.10	2.3	5.5	ND 3.0	J 0.29	0.081	4.3	J 0.34	ND 0.10	19
August	2013	5.71	8-Aug	2.7	ND 0.10	ND 0.90	3.4	ND 3.0	J 0.27	0.0076	3.1	J 0.28	ND 0.10	21
September	2013	5.71	11-Sep	2.4	ND 0.25	J 0.55	5.7	ND 3.0	ND 0.50	0.0082	3.5	J 0.40	ND 0.50	16
October	2013	5.70	10-Oct	1.5	ND 0.25	ND 0.5	4.6	ND 3.0	ND 0.50	0.0210	3.2	0.19	ND 0.50	20
November	2013	4.42	12-Nov	1.6	ND 0.25	ND 0.5	5.4	ND 3.0	ND 0.50	0.01	2.8	J 0.20	ND 0.50	21
December	2013	4.68	11-Dec	1.4	ND 0.25	ND 0.5	5.4	ND 3.0	ND 0.50	0.011	2.6	0.27	ND 0.50	27
Maximum				3.1	0.25	2.30	5.7	3.0	0.50	0.0810	4.3	0.45	0.50	27
Minimum				1.4	0.10	0.50	1.9	3.0	0.22	0.0002	2.5	0.06	0.10	11
Average				2.13	0.16	3.39	3.67	3.0	0.36	0.0156	3.28	0.27	0.26	18.4
PERMIT LIMIT (AMEL)														

(* Hg limit is from RWQCB2 Order No. R2-2007-0077)

A "J" flagged result indicates an estimated concentration above the Method Detection Limit (MDL) as below RL/ML (Reporting Limit/Minimum Level)
The "J" flag is equivalent to the DNQ Estimated Concentration Flag.

VOLATILE ORGANICS

III. VOLATILE ORGANICS

Analytical Test Method - EPA 624

Laboratory: TEST AMERICA

January - June 2013 Reporting Period

	Influent		Effluent	
	Date	Time	Date	Time
Sample Date/time	9/11/2013	12:50	9/11/2013	13:16
Analysis Date/time	9/13/2013	22:50	9/13/2013	18:40
Flow, MGD	5.35		5.71	
Parameter	Reporting Limit µg/l	Influent µg/l	Reporting Limit µg/l	Effluent µg/l
VOLATILES				
Acrolein	20.0	N.D.	5.0	N.D.
Acrolonitrile	10.0	N.D.	2.0	N.D.
Benzene	2.5	N.D.	0.5	N.D.
Bromodichloromethane	2.5	N.D.	0.5	1.2
Bromoform	2.5	N.D.	0.5	0.5
Bromomethane (Methyl Bromide)	2.5	N.D.	0.5	N.D.
Carbon tetrachloride	2.5	N.D.	0.5	N.D.
Chlorobenzene	2.5	N.D.	0.5	N.D.
Chloroethane (Ethyl Chloride)	2.5	N.D.	0.5	N.D.
2-Chloroethyl vinyl ether	5.0	N.D.	1.0	N.D.
Chloroform	2.5	7.7	0.5	2.6
Chloromethane (Methyl Chloride)	2.5	N.D.	0.5	N.D.
Dibromochloromethane	2.5	N.D.	0.5	0.4
1,2-Dichlorobenzene	2.5	N.D.	0.5	N.D.
1,3-Dichlorobenzene	2.5	N.D.	0.5	N.D.
1,4-Dichlorobenzene	2.5	N.D.	0.5	N.D.
Dichlorodifluoromethane	2.5	N.D.	0.5	N.D.
1,1-Dichloroethane	2.5	N.D.	0.5	N.D.
1,2-Dichloroethane	2.5	N.D.	0.5	N.D.
1,1-Dichloroethene	2.5	N.D.	0.5	N.D.
cis-1,2-Dichloroethene	2.5	N.D.	0.5	N.D.
trans-1,2-Dichloroethene	2.5	N.D.	0.5	N.D.
1,2-Dichloropropane	2.5	N.D.	0.5	N.D.
cis-1,3-Dichloropropene	2.5	N.D.	0.5	N.D.
trans-1,3-Dichloropropene	2.5	N.D.	0.5	N.D.
Dichlorotrifluoroethane	2.5	N.D.	0.5	N.D.
Ethylbenzene	2.5	N.D.	0.5	N.D.
Methyl tert-butyl ether (MTBE)	2.5	N.D.	0.5	N.D.
Methylene Chloride	3.0	N.D.	0.5	N.D.
1,1,2,2-Tetrachloroethane	2.5	N.D.	0.5	N.D.
Tetrachloroethene (PCE)	2.5	N.D.	0.5	N.D.
Toluene	2.5	2.6	0.5	0.9
1,1,2-Trichloroethane	2.5	N.D.	0.5	N.D.
1,1,1-Trichloroethane (TCA)	2.5	N.D.	0.5	N.D.
Trichloroethene (TCE)	2.5	N.D.	0.5	N.D.
Trichlorofluoromethane (F-11)	2.5	N.D.	0.5	N.D.
Trichlorotrifluoroethane	2.5	N.D.	1.0	N.D.
Vinyl Chloride	2.5	N.D.	0.5	N.D.
Xylenes, total	2.5	N.D.	0.5	N.D.

RECOVERY RATES				
4-Bromofluorobenzene (SS)	85-115%	94%	85-115%	93%
Dibromofluoromethane (SS)	85-115%	106%	85-115%	109%
1,2-Dichloroethane-d4 (SS)	75-125%	99%	75-125%	104%
Toluene-d8 (SS)	90-121%	111%	90-121%	108%

"J" - RESULT IS LESS THAN THE REPORTING LIMIT BUT GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL), AND THE CONCENTRATION IS AN APPROXIMATE VALUE.

"SS" - compound is a Surrogate Spike used per laboratory quality assurance manual

ORGANOCHLORINE PESTICIDES

IV. ORGANOCHLORINE PESTICIDES (PCBs)

Analytical Test Method - EPA 608

Laboratory: TEST AMERICA

July - December 2013 Reporting Period

	Influent		Effluent	
	Date	Time	Date	Time
Sample Date/time			9/11/2013	9:36
Analysis Date/time			9/18/2013	15:34
Flow, MGD			5.71	
Parameter	Reporting Limit* µg/l	Influent µg/l	Reporting Limit* µg/l	Effluent µg/l
Endrin	0.0052	N.S.	0.0052	N.D.
Arochlor 1016	0.51	N.S.	0.51	N.D.
Arochlor 1221	0.51	N.S.	0.51	N.D.
Arochlor 1232	0.51	N.S.	0.51	N.D.
Arochlor 1242	0.51	N.S.	0.51	N.D.
Arochlor 1248	0.51	N.S.	0.51	N.D.
Arochlor 1254	0.51	N.S.	0.51	N.D.
Arochlor 1260	0.51	N.S.	0.51	N.D.

"J" - RESULT IS LESS THAN THE REPORTING LIMIT BUT GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL), AND THE CONCENTRATION IS AN APPROXIMATE VALUE.

N.S. - Not Sampled

*Detection limits are stated at the highest for either influent or effluent or both are listed.

BIOSOLIDS TEST RESULTS - Part a

Analytical Test Method - EPA 625
July - December 2013 Reporting Period

Sample Date Sample Time	9/15/2013	17:30
Analysis Date Analysis Time	9/24/2013	21:04
Percent Solids		1.20%
Parameter	Reporting Limit µg/l	Results µg/l
BASE/NEUTRAL EXTRACTABLES		
Acenaphthene	110	N.D.
Acenaphthylene	110	N.D.
Anthracene	110	N.D.
Benzidine	210	N.D.
Benzo (a) anthracene	110	N.D.
Benzo (b) fluoranthene	110	N.D.
Benzo (k) fluoranthene	110	N.D.
Benzo (a) pyrene	110	N.D.
Benzo (g,h,i) perylene	110	N.D.
Benzyl butyl phthalate	210	N.D.
Bis (2-chloroethyl) ether	110	N.D.
Bis (2-chloroethoxy) methane	110	N.D.
Bis (2-ethylhexyl) phthalate	530	J 52
4-Bromophenyl phenyl ether	110	N.D.
2-Chloronaphthalene	110	N.D.
4-Chlorophenyl phenyl ether	110	N.D.
Chrysene	110	N.D.
Dibenzo (a,h) anthracene	210	N.D.
Di-n-butylphthalate	210	N.D.
3,3'-Dichlorobenzidine	210	N.D.
Diethyl phthalate	110	N.D.
Dimethyl phthalate	110	N.D.
2,4-Dinitrotoluene	110	N.D.
2,6-Dinitrotoluene	110	N.D.
Di-n-octylphthalate	210	N.D.
Fluoranthene	110	N.D.
Fluorene	110	N.D.
Hexachlorobenzene	110	N.D.
Hexachlorobutadiene	110	N.D.
Hexachlorocyclopentadiene	210	N.D.
Hexachloroethane	110	N.D.
Indeno (1,2,3-cd) pyrene	210	N.D.
Isophorone	110	N.D.
Naphthalene	110	N.D.
Nitrobenzene	210	N.D.
N-Nitrosodiphenylamine	210	N.D.
N-Nitroso-di-n-propylamine	110	N.D.
Phenanthrene	110	N.D.
Pyrene	110	N.D.
1,2,4-Trichlorobenzene	110	N.D.
RECOVERY RATES		
Nitrobenzene - d5	45-120%	38%
2-Fluorobiphenyl	50-120%	17%
Terphenyl - d14	10-150%	19%
2-Fluorophenol	30-120%	57%
Phenol - d6	35-120%	65%
2,4,6 - Tribromophenol	40-120%	69%

"J" - RESULT IS LESS THAN THE REPORTING LIMIT BUT GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL), AND THE CONCENTRATION IS AN APPROXIMATE VALUE.

BIOSOLIDS TEST RESULTS - Part b

SLUDGE TEST RESULTS

Laboratory: Test America

Analytical Test Method - EPA 6020 - Metals (ICP/MS)

July - December 2013 Reporting Period

Sample Date/Time	09/15/2013	17:30		
Percent Solids		1.20%		
Parameter	Reporting Limit µg/l	Results µg/l		
Metals			Analysis Date	Analysis Time
Arsenic	25	49	9/23/2013	22:01
Cadmium	25	31	9/23/2013	22:01
Chromium	50	180	9/23/2013	22:01
Copper	50	2,700	9/23/2013	22:01
Lead	25	220 B	9/23/2013	22:01
Nickel	50	210	9/23/2013	22:01
Selenium	50	20 J	9/23/2013	22:01
Silver	25	28	9/23/2013	22:01
Zinc	500	7,300	9/23/2013	22:01

Analytical Test Method - EPA 7470A - Mercury (CVAA)

	Reporting Limit mg/l	Results mg/l	Analysis Date	Analysis Time
Mercury	0.0010	0.0067	9/18/2013	19:15

General Chemistry

	Reporting Limit	Results	Analysis Date	Analysis Time
Cyanide	25 µg/l	66 µg/l	9/25/2013	18:44
Total Solids	10 mg/l	12000 mg/l	9/25/2013	18:44

"J" - RESULT IS LESS THAN THE REPORTING LIMIT BUT GREATER THAN OR EQUAL TO THE METHOD DETECTION LIMIT (MDL), AND THE CONCENTRATION IS AN APPROXIMATE VALUE.

"B" - RESULTS INDICATES COMPOUND WAS FOUND IN THE BLANK AND THE SAMPLE.

The City of Richmond is a member of the West County Agency (WCA) and each agency monitors their biosolids for toxicity. The WCA's new NPDES permit limits became effective in July of 2013.

F. INSPECTION, SAMPLING, and ENFORCEMENT PROGRAM

1). Inspections:

Compliance inspections were scheduled for most of the SIUs during the first or second quarter, with the exception of West County Wastewater District. They were inspected during the fourth quarter.

The Compliance inspection procedure (Appendix F-1) consists of a walkthrough with a check list (Appendix F-2) for manufacturing/production practices, pretreatment system, chemical/hazardous material storage, spill control contingency plan, slug control plans, hazardous waste storage, monitoring records, training records, laboratory procedures (if self-monitoring), and flow measuring devices (if applicable).

Federally regulated pollutants are analyzed at categorical IUs at least annually. Other pollutants that would be analyzed are based on what is on site that could realistically be discharged. This could be determined by the inspection, permit application, or initial POTW and IU monitoring.

Criteria for determining the number of inspections may be based on the following:

- Federal Categorical Standard Classification
- Potential for Facility to cause upset, pass-through or interference at the Treatment Plant
- Nature of process water being discharged
- Is the water being discharged batched or continuous?
- What is the daily volume being discharged?
- What are the hours of operation?
- Raw Materials stored on site or used in process area

2). Sampling Events:

The City is in the process of updating its Sampling Protocols. These will be submitted to the Board once they are finalized.

Criteria for determining frequency of Sampling Events may be based on the following:

- Federal Categorical Standard Classification
- Compliance Status – (previous or on-going violations)
- Potential for Facility to cause upset, pass-through or interference at the Treatment Plant
- Is the water being discharged batched or continuous?
- Complaints issued by neighbor, former employee, or outside agency?
- Historical knowledge of Industrial User's practices.

An example of the updated chain-of-custody is attached. (Appendix F-4)

The monitoring data are submitted to the City from Veolia's Subcontracted Laboratories (via e-mail) to the City's Source Control Inspector III. (These labs results also include the QA/QC data).

3). Enforcement:

The City's Industrial Pretreatment Program updated its Enforcement Response Plan (Appendix F-5) in February 2013. However, during the Pretreatment Program Audit, it was determined that there were sections that were still inadequate. The City is revising the plan and will take it back to City Council for adoption Spring of 2014.

The Stormwater Enforcement Response Plan is maintained by the Engineering Services Department.

G. UPDATED LIST OF REGULATED SIUs

1). CIUs:

Those SIUs regulated by Federal categorical standards are listed by the category under which they fall. The specific category, including the subpart and 40 CFR section which applies, is listed in Table 2a (attached).

If the local limits are more stringent than the federal limits, then the local limit supersedes them. The local limits are determined at a monitoring point defined in each permit. These end-of-pipe monitoring points for categorical IUs are upstream of any domestic or other flows. So end-of-pipe local limits are measured at the same point as end-of-process federal limits.

The City will revise its local limits in Spring 2014 based on the requirements in its NPDES permit NPDES permit Section VI.C.4.a.(1)(d). The limit for Cyanide will be reduced from 0.29 mg/l to 0.26 mg/l. Please refer to letter (Appendix G-1) dated December 23, 2013 for more details.

The combined waste stream formula is applied to the federal limits for Bio-Rad Laboratories only; no other CIUs require this calculation. Bio-Rad Laboratories, located at 3110 Regatta Blvd., submitted monitoring information in May 1996, and a correction factor of 0.982 was applied to the federal categorical limits for Organic Chemicals.

The City requested updated waste discharge information from Bio-Rad in April 2013 (as part of their annual compliance inspection). Based upon the information submitted, the correction factor remained unchanged (0.982). The limits, including the calculation factor, are noted in Table 2b (attached) for Organic Chemicals.

2). Non-categorical SIUs:

All non-categorical SIUs are summarized in Table 2c (attached).

TABLE 2a - CATEGORICAL INDUSTRIAL USER INFORMATION (METAL FINISHERS AND ELECTROPLATING):

FEDERAL INDUSTRIAL CATEGORY OR LOCAL	FEDERAL STANDARDS		Local Stds in Add'n to		BMR Due Date	Compl Date	COMMENTS
	Parameter	Max Limit mg/L	Avg. Lim. mg/L	Parameter			
Conversion Coatings 710 South 33rd Street Richmond, CA 94804	Cyanide	1.20	0.65	Copper	0.65	-	
	Chromium	0.11	0.07	Chromium	0.27	-	
	Lead	2.77	1.71	Lead	0.30	-	
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	Copper	3.38	2.07	Nickel	0.27	-	
	Lead	0.69	0.43	Zinc	1.00	-	
	Nickel	3.98	2.38	Mercury	0.005	-	
Metal Finishing Subcategory New Source	Silver	0.43	0.24				
	Zinc	2.61	1.48				
	TTO	2.13					
Electroforming 130 Nevln Ave. Richmond, CA 94804	Cyanide	5.00	2.70	Cyanide	0.29	-	
	Lead	0.60	0.40	Lead	0.30	-	09/28/81
	Cadmium	1.20	0.70	Cadmium	0.05	-	04/27/84
Electroplating 40 CFR 413, Subpart A Common Metals Subcategory Existing Source	TTOS	4.57		Zinc	1.00	-	
				Copper	0.65	-	
				Nickel	0.27	-	
Richmond Metal Painting 1143 Marina Way South Richmond, CA 94804				Mercury	0.005	-	
	Cyanide	1.20	0.65	Copper	0.65	-	
	Cadmium	0.11	0.07	Chromium	0.27	-	
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	Chromium	2.77	1.71	Lead	0.30	-	
	Copper	3.38	2.07	Nickel	0.27	-	
	Lead	0.69	0.43	Zinc	1.00	-	
Metal Finishing Subcategory New Source	Nickel	3.98	2.38	Mercury	0.005	-	
	Silver	0.43	0.24				
	TTO	2.61	1.48				
Vertilo, Inc. 250 Canal Blvd. Richmond, CA 94804	Cyanide	1.20	0.65	Copper	0.65	-	
	Cadmium	0.11	0.07	Chromium	0.27	-	
	Chromium	2.77	1.71	Lead	0.30	-	
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	Copper	3.38	2.07	Nickel	0.27	-	
	Lead	0.69	0.43	Zinc	1.00	-	
	Nickel	3.98	2.38	Mercury	0.005	-	
Metal Finishing Subcategory New Source	Silver	0.43	0.24				
	Zinc	2.61	1.48				
	TTO	2.13					

Note: List by most specific subcategory and/or grouping available.

TABLE 2a FEDERAL CATEGORIES / LOCAL STANDARDS
FOR REPORTING PERIOD 01/01/13 TO 12/31/13

TABLE 2b - CATEGORICAL INDUSTRIAL USER INFORMATION (ORGANIC CHEMICALS):

FEDERAL INDUSTRIAL CATEGORY OR LOCAL NON-CATEGORICAL GROUP	FEDERAL STANDARDS		Local Stds in Addr'n to or > Stringent / Federal Standards		BMR Due Date	Compl Date	COMMENTS
	Parameter	Max Limit ppb	Avg. Limit ppb	Parameter			
Bio-Rad Laboratories 3110 Regatta Blvd. Richmond, CA 94804 Organic Chemicals, Plastics, and Synth Fibers Category 40 CFR 414, Subpart E Thermosetting Resins Subcategory Existing Source	Acenaphthene	46	19 Xylene	1.0	-	06/07/96	Based on the combined wastewater formula calculations Bio-Rad at 3110 Regatta Boulevard, Richmond, submitted on May 30, 1996, the federal limits have been corrected by a factor of 0.992
	Anthracene	46	19 Zinc	1.00	-	07/23/96	
	Benzene	132	56 Copper	0.65	-		
	Bis[2-(2-ethylhexyl)phthalate Carbon Tetrachloride	253	93 Chromium	0.27	-		
	Chlorobenzene	373	139 Lead	0.30	-		
	Chloroethane	290	139 Mercury	0.005	-		
	Chloroform	319	108				
	Di-n-butyl phthalate	42	109				
	1,2-Dichlorobenzene	790	20				
	1,3-Dichlorobenzene	373	192				
	1,4-Dichlorobenzene	373	139				
	1,1-Dichloroethane	58	139				
	1,2-Dichloroethane	564	22				
	1,1-Dichloroethylene	59	177				
	1,2-trans-Dichloroethylene	65	22				
	1,2-Dichloropropane	780	25				
	1,3-Dichloropropane	780	192				
	Diethyl phthalate	111	173				
	Dimethyl phthalate	46	45				
	4,6-Dinitro-o-cresol	272	19				
	Ethylbenzene	373	77				
Fluoranthene	53	139					
Fluorene	46	22					
Hexachlorobenzene	780	19					
Hexachlorobutadiene	373	192					
Hexachloroethane	780	373					
Methyl Chloride	290	139					
Methylene Chloride	167	108					
Naphthalene	46	35					
Nitrobenzene	6,287	19					
2-Nitrophenol	227	2,197					
4-Nitrophenol	566	64					
Phenanthrene	46	159					
Pyrene	47	19					
Tetrachloroethylene	161	20					
Toluene	73	51					
Total Cyanide	1,178	27					
Total Lead	678	412					
Total Zinc	2,563	314					
1,2,4-Trichlorobenzene	780	192					
1,1,1-Trichloroethane	58	22					
1,1,2-Trichloroethane	125	31					
Trichloroethylene	68	26					
Vinyl Chloride	169	95					

Note: List by most specific subcategory and/or grouping available.

TABLE 2 FEDERAL CATEGORIES / LOCAL STANDARDS
FOR REPORTING PERIOD 01/01/13 TO 12/31/13

TABLE 2c - NON-CATEGORICAL INDUSTRIAL USER INFORMATION:

TABLE 2c FEDERAL CATEGORIES / LOCAL STANDARDS
FOR REPORTING PERIOD 01/01/13 TO 12/31/13

FEDERAL INDUSTRIAL CATEGORY OR LOCAL NON-CATEGORICAL GROUP	FEDERAL STANDARDS		Local Stds in Add'n to or > Stringent / Federal Standards		BMR Due Date	Compl Date	COMMENTS
	Parameter	Max Limit mg/L	Avg. Lim. mg/L	Parameter			
Bay Area Rapid Transit 1281 Vesalia Ave. Richmond, CA 94801				TTOs Copper Lead Mercury Oil & Grease Zinc	1.0- 0.65- 0.3- 0.005- 90- 1.0-	N/A	
Non-categorical Mass Transit							
Burlington Northern & Santa Fe Railroad 980 Hensley Street Richmond, CA 94801				Benzene Chromium Copper Mercury Nickel Zinc Oil & Grease Xylene Toluene	1.0- 0.50- 0.65- 0.005- 1.0- 1.0- 90- 1.0- 1.0-	N/A	
Non-categorical Shipping Terminals							
California Oils 1145 Harbour Way South Richmond, CA 94804				Chromium Copper Mercury Nickel Zinc	0.5- 0.65- 0.005- 0.27- 1.0- 1.0-	N/A	
Non-categorical Vegetable Oil Processing							
West County Wastewater District 2377 Garden Tract Road Richmond, CA 94801				Cadmium Chromium Copper Mercury Nickel Zinc Cyanide Ammonia as NH ₃	0.05- 0.27- 0.65- 0.005- 0.27- 1.0- 0.29- 160-	N/A	
Non-categorical Landfill Leachate							

3). Current list of SIUs:

New industries are discovered through the City's Business License process, periodic internet searches, vehicle patrols, outside Agency referrals, water account review (for new sewer fees) and feedback from industrial permittees.

In 2012, there were nine SIUs (two less than the previous reporting period). Based on an initial water account review, it was estimated that the number of SIUs would increase to fourteen in 2013 (Appendix G-2).

However, upon further investigation and data review, it was determined that these industries due not warrant being classified as Significant Industrial Users as most of their discharge is domestic waste due to the number of employees on site. Kennedy High School is in the process of building a new Science Wing. The City will monitor its progress to determine if they need to be concerned with the discharge from that particular building as they will have some pretreatment system installed based on the initial building plans submitted for construction.

The list has been updated and now only contains ten (10) Industrial Dischargers. Five (5) of those SIUs listed are categorical. Of the five (5) categorical industries listed, one (1) is a Zero Discharger. (Appendix G-3)

This list is reviewed twice a year and updated as needed.

H. SIU (categorical and non-categorical) Compliance Activities

1). Inspection and Sampling Summary:

Inspection and sampling activities are summarized in Tables 3a, 3b and 3c. If the IU was not sampled during a particular quarter, it was either because it did not discharge during that period, was not scheduled to be sampled, or the sampling frequency was changed.

The City allows the industrial user to conduct sample collection without the presence of City personnel.

TABLE 3a - Inspection, Sampling and Enforcement Summary (Metal Finishing & Electroplating Categorical Industries):

TABLE 3 MONITORING, SAMPLING, COMPLIANCE AND ENFORCEMENT

FOR REPORTING PERIOD 01/01/13 TO 12/31/13

INDUSTRIAL USER	QTR	MONITORING										ENFORCEMENT ACTIONS TAKEN						
		Sch. Samp Events	Act. Samp Events	Planned Comp Insp.	Comp. Insp.	Spills, Energy	Cl. Mtl Yr	Samp Mtl Yr	Sampled by IUP/POTW/Other	Compliance Status	Warning Notice	Violation Notice	Time Schedule	Admin Order	Civil Action	Criminal Action	Other	
Conversion Coatings 710 South 33rd Street Richmond, CA 94804	1	1	1	0	1	0	0	1	IU	CC								
	2	1	1	1	1	0	1	IUP/POTW/	CC									
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	3	1	1	0	0	0	0	IU	CC									
	4	1	1	0	0	0	1	IU	CC									
Electroforming 130 Newin Ave. Richmond, CA 94804	1	NS	0	1	0	0	0	NA	CC									
	2	NS	0	0	1	0	1	NA	CC									
Electroplating 40 CFR 413, Subpart A Common Metals Subcategory Existing Source	3	NS	0	0	0	0	0	NA	CC									
	4	NS	0	0	0	0	1	NA	CC									
Richmond Metal Painting 1143 Marina Way South Richmond, CA 94804	1	1	1	1	1	0	0	IU	IL		X							
	2	1	1	0	1	0	1	IUP/POTW/	CC									
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	3	1	1	0	0	0	0	IU	CC									
	4	1	1	1	1	0	1	IU	CC									
Verflo, Inc. 250 Canal Blvd. Richmond, CA 94804	1	1	1	1	1	0	0	IU	CC									
	2	1	1	0	0	0	1	IUP/POTW/	CC									
Metal Finishing 40 CFR 433, Subpart A Metal Finishing Subcategory New Source	3	1	1	1	1	0	0	IU	CC									
	4	1	1	0	0	0	1	IU	CC									

- Number of planned compliance inspections
 - Actual number of compliance inspections
 - Number of inspections in response to spills or emergencies
 - Number of planned compliance inspections for next year
 - Number of sampling events planned for next year

F - INSIGNIFICANT NONCOMPLIANCE, FEDERAL LIMITS
 L - INSIGNIFICANT NONCOMPLIANCE, LOCAL LIMITS

U - UNKNOWN
 NS - NOT SCHEDULED TO BE SAMPLED

TABLE 3b - Inspection, Sampling and Enforcement Summary (Organic Chemical Categorical Industry):

TABLE 3 MONITORING, SAMPLING, COMPLIANCE AND ENFORCEMENT
FOR REPORTING PERIOD 01/01/13 TO 12/31/13

INDUSTRIAL CATEGORY:	Organic Chemical Manufacturing																			
	NAME ADDRESS	QTR	Sch. Samp Events	Act. Samp Events	Planned Comp Insp.	MONITORING			Sampled by		ENFORCEMENT ACTIONS TAKEN									
Comp. Insp.						Spills Energy	C.I. Mt Yr	Samp Mt Yr	IU/POTW/ Other	Compliance Status	Warning Notice	Violation Notice	Time Schedule	Admin Order	Civil Action	Criminal Action	Other			
Bio-Rad Laboratories 3110 Regatta Blvd. Richmond, CA 94804 Organic Chemicals, Plastics, and Synthetic Fibers Category 40 CFR 414, Subpart E Thermosetting Resins Subcategory Existing Source	1	1	1	0	0	0	0	1	IU	F			X							
	2	1	1	1	0	0	1	1	IU	CC										
	3	1	1	0	0	0	1	1	IU	L		X								
	4	1	1	0	1	0	1	1	IU/POTW	CC										
	1																			
	2																			
	3																			
	4																			
MONITORING HEADINGS																				
- Number of planned/scheduled sampling events - Actual number of sampling events - Number of planned compliance inspections - Actual number of compliance inspections - Number of inspections in response to spills or emergencies - Number of planned compliance inspections for next year - Number of sampling events planned for next year																				
COMPLIANCE STATUS KEYS																				
SF - SIGNIFICANT NONCOMPLIANCE, FEDERAL LIMITS SL - SIGNIFICANT NONCOMPLIANCE, LOCAL LIMITS F - INSIGNIFICANT NONCOMPLIANCE, FEDERAL LIMITS L - INSIGNIFICANT NONCOMPLIANCE, LOCAL LIMITS																				
CC - CONSISTENT COMPLIANCE * - ON A TIME SCHEDULE U - UNKNOWN NS - NOT SCHEDULED TO BE SAMPLED																				

TABLE 3c - Inspection, Sampling and Enforcement Summary (Non-Categorical Industries)

TABLE 3 MONITORING, SAMPLING, COMPLIANCE AND ENFORCEMENT
FOR REPORTING PERIOD 01/01/13 TO 12/31/13

INDUSTRIAL CATEGORY:	INDUSTRIAL USER NAME ADDRESS	QTR	MONITORING						Sampled by	Compliance Status	ENFORCEMENT ACTIONS TAKEN									
			Sch. Samp Events	Act. Samp Events	Planned Comp Insp.	Comp. Insp.	Spills, Emergency	C.L. Nxt Yr			Samp Nxt Yr	IU/POTW/Other	Warning Notice	Violator Notice	Time Schedule	Admin Order	Civil Action	Criminal Action	Other	
Non-categorical	Bay Area Rapid Transit 1281 Vesalia Ave. Richmond, CA 94801	1	1	2	0	0	0	0	0	1	IU/POTW	SL		X	X					
		2	1	4	1	1	0	1	1	IU/POTW	SL			X	X					
		3	1	8	0	0	0	0	1	IU/POTW	SL			X	X					X
		4	1	2	0	0	0	0	1	IU	CC									X
	Burlington Northern & Santa Fe Railroad 980 Hensley Street Richmond, CA 94801	1	1	1	0	0	0	0	0	1	IU	CC								
		2	1	1	1	1	0	1	1	IU/POTW	CC									
		3	1	1	0	0	0	0	1	IU	CC									
		4	1	1	0	0	0	0	1	IU	CC									
	California Oils 1145 Harbour Way-South Richmond, CA 94804	1	1	2	0	0	0	0	1	IU	IL			X						
		2	1	2	1	1	0	1	1	IU	CC									
		3	1	1	0	0	0	0	1	IU/POTW	CC									
	Non-categorical		4	1	1	0	0	0	0	1	IU	CC								
1			1	1	0	0	0	0	NS	IU	SL			X	X					
2			1	1	1	0	0	1	NS	IU	IL			X	X				X	
3			1	1	0	0	0	0	NS	IU	CC									
West County Wastewater District 2377 Garden Tract Road Richmond, CA 94801		4	1	1	0	0	0	0	NS	IU/POTW	CC									
		1	1	1	0	0	0	0	NS	IU	SL			X	X					
		2	1	1	1	0	0	1	NS	IU	IL			X	X					
		3	1	1	0	0	0	0	NS	IU	CC									
Non-categorical Landfill Leachate		4	1	1	0	0	0	0	NS	IU/POTW	CC									

MONITORING HEADINGS
 - Number of planned/scheduled sampling events
 - Actual number of sampling events
 - Number of planned compliance inspections
 - Actual number of compliance inspections
 - Number of inspections in response to spills or emergencies
 - Number of planned compliance inspections for next year
 - Number of sampling events planned for next year

COMPLIANCE STATUS KEYS
 SF - SIGNIFICANT NONCOMPLIANCE, FEDERAL LIMITS
 SL - SIGNIFICANT NONCOMPLIANCE, LOCAL LIMITS
 IF - INSIGNIFICANT NONCOMPLIANCE, FEDERAL LIMITS
 IL - INSIGNIFICANT NONCOMPLIANCE, LOCAL LIMITS
 CC - CONSISTENT COMPLIANCE
 * - ON A TIME SCHEDULE
 U - UNKNOWN
 NS - NOT SCHEDULED TO BE SAMPLED

2). Enforcement Summary:

Enforcement and other compliance summaries are also included in Table 3a, 3b, and 3c (above) and are discussed in detail in the previous semi-annual report for January – June 2013. Any new Enforcement Actions are discussed in detail in Section 3) July-December Semi-Annual Data (below).

3). July-December Semiannual Data:

Compliance Summary (Metal Finishers)

Conversion Coatings

Consistent Compliance for the past six months.

Richmond Metal Painting

Consistent Compliance for the past six months.

Parker Hannifin (Veriflo)

Consistent Compliance for the past six months.

Compliance Summary (Organic Chemicals)

Bio-Rad Laboratories

Letter of Warning issued for Late Self-Monitoring Report

Compliance Summary (Non-categorical)

Burlington Northern Santa Fe (BNSF)

Consistent Compliance for the past six months.

Bay Area Rapid Transit (BART)

On a Time Schedule to Comply

Violations for Copper, Nickel, Zinc and pH

BART continued to violate for metals at the Blow-pit. Below is a chronology of events:

- The City deployed composite samplers for three consecutive days (July 15 - 18, 2013) to evaluate BART's "continuous" discharge for compliance. Twenty-four hour composite samples were collected July 15 - July 16th (Day 1), July 16th - July 17th (Day 2) and July 17th - July 18th (Day 3).
- During the monitoring period on July 18, 2013, the City and BART personnel identified that the pretreatment system had failed and required significant maintenance. Based on previous samples taken at this location (colorless, low viscosity, low amount of solids), Wastewater samples appeared to be untreated (dark color, high amount of suspended solids, thick viscous liquid).

The City requested a rush on the analyses performed for the samples taken at that time. Results that were received on July 22, 2013 indicated a slug discharge violation had occurred (extremely high concentrations of metals – Cu, Pb, Zn).

The following Notices of Violations were issued for discharge violations occurring at the Blow-pit:

- NOV #121 issued on 07/19/13 for failure to maintain pH chart recorded
- 7/17/2013 [Blow-pit] NOV #131 issued on 8/8/13 Copper Violation (8.0 ppm) on 7/17/2013
- [Blow-pit] NOV #131 issued on 8/8/13 Zinc Violation (9.1 ppm) on 7/17/2013
- [Blow-pit] NOV #122 issued on 07/25/13 Copper Violation (11.0 ppm) on 7/18/2013
- [Blow-pit] NOV #123 issued on 07/25/13 Lead Violation (0.85 ppm) on 7/18/2013
- [Blow-pit] NOV #124 issued on 07/25/13 Nickel Violation (0.45 ppm) on 7/18/2013
- [Blow-pit] NOV #125 issued on 07/25/13 Zinc Violation (31.0 ppm) on 7/18/2013
- [Blow-pit] NOV #127 issued on 07/25/2013 for failure to prevent slug discharge to sanitary sewer on 7/18/2013
- [Blow-pit] NOV #128 issued on 07/25/2013 requiring BART to cease all discharges from Blow-pit area until further notice from Control Authority.

Until this system is in place all blow-pit wastewater “events” will be hauled off site. All wastewater “event” records will be sent to the City as they occur.

City inspectors also informed BART to cease discharge from maintenance shop the same day on July 18, 2013.

California Oils Corporation

Consistent Compliance for the past six months.

West County Wastewater District (WCWD):

Resolution of permitting issue between the City of Richmond, West County Wastewater District and the West County Landfill.

The City receives leachate managed by the West County Wastewater District (WCWD) from the Republic Services Landfill. WCWD contributes their secondary effluent to the EBMUD North Richmond Water Reclamation Plant adjacent to it. However, several of the leachate waste streams from the Landfill are high in dissolved solids and chloride, which would interfere with the EBMUD reclamation project. This is under the terms of a Joint Power Agreement allowing the out of district discharge to be accepted by the City of Richmond, and the controlling mechanism is an Industrial Discharge Permit issued to WCWD by the City.

Both the City and the West County Wastewater District are meeting to determine the legal aspects of the permitting process regarding the West County Landfill. This is based on the findings of the December 2012 Pretreatment Compliance Audit. The City has hired Larry Walker and Associates to assist with this issue and should have this permitting issue resolved no later than December 31, 2013.

The City (along with Larry Walker and Associates) met with West County Wastewater District (WCWD) to resolve the permitting issues regarding the Leachate that is discharged from the landfill.

Since the PCA, the landfill began a pilot project in June 2013 to discharge leachate every weekday instead of only about twice per week. That more frequent discharge of the leachate has resulted in numerous benefits:

- It permitted the flows on days of discharge to drop below 25,000 gallons per day;
- It allowed the ammonia load to stay within City's Local Limit of 100 lbs./day, and
- It dampened weekly fluctuations in ammonia concentrations at the City's wastewater treatment plant so that it could consistently operate without interference or pass-through.

As a result, the landfill has continued with that discharge pumping schedule (with no Ammonia violations).

Therefore the WCWD District and the City concurred that the landfill leachate was not a Significant Industrial User.

The WCWD District and the City, in response to our respective PCAs, agreed that the District would issue a control mechanism to the landfill rather than the City maintaining its existing permit with the District for the landfill leachate.

The District is in the process of issuing that control mechanism to the landfill, and any updates will be reported in future Pretreatment Program reports.

**SIGNIFICANT INDUSTRIAL USER COMPLIANCE REPORTS:
Table 1a – Metal Finisher’s Discharge Table**

QUARTERLY INDUSTRIAL USER VIOLATION REPORT
(REPORT FOR PERIOD 07/01/2013 TO 12/31/2013)

CATEGORY: METAL FINISHING SUBCATEGORY (40 CFR PART 433, SUBPART A), all units in mg/l unless otherwise specified											
INDUSTRIAL USER NAME AND ADDRESS	COMPLIANCE STATUS LIST 4 Q (1)				SAMPLE/ INSPECTION DATE/VIOLATION OCCURRED	SAMPLED BY POTW/ IU OTHER	FLOW (2)	SAMPLES IN VIOLATION			Date of and Comments or Follow-up, Corrective or enforcement Action Taken
	1	2	3	4				PARAMETER	REPORTED LEVEL mg/l	DISCH LIMIT mg/l	
Conversion Coatings 710 South 33rd Street Richmond, CA 94804	CC	CC	CC	CC			A				Consistent compliance for the past 6 months.
New Source											
Richmond Metal Painting 1143 Marina Way South Richmond, CA 94804	CC	CC	CC	II			A				Consistent compliance for the past 6 months.
New Source											
Parker Hanjin Veriflo Division 250 Canal Blvd Richmond, CA 94804	CC	CC	CC	CC			A				Consistent compliance for the past 6 months
New Source											

(1) Compliance Status Key - #1 Most Recent Quarter
 SF - Significant Noncompliance, Federal Limits
 SI - Significant Noncompliance, Local Limits
 IF - Insignificant Noncompliance, Federal Limits
 IL - Insignificant Noncompliance, Local Limits
 ** Indicates a corrected compliance status report

(2) Flow Key (gpd) State actual flow if known
 A. 0 - 9,999
 B. 10,000 - 29,000
 C. 30,000 - 49,000
 D. 50,000 - 99,000
 E. 100,000 +

Table 1c - Non-Categorical Industrial User Discharge Table

QUARTERLY INDUSTRIAL USER VIOLATION REPORT
 (REPORT FOR PERIOD 07/01/2013 TO 12/31/2013)

INDUSTRIAL USER	NON-CATEGORICAL, All Units in mg/L				SAMPLE/INSPECTION DATE/VIOLATION OCCURRED	SAMPLED BY POTW/IU OTHER	FLOW (cfs)	PARAMETER	SAMPLES IN VIOLATION		Date of and Comments or Follow-up, Corrective or enforcement Action Taken
	COMPLIANCE STATUS LIST 4 Q (1)								REPORTED LEVEL mg/L	DECU. LIMIT mg/l	
Burlington Northern & Santa Fe 980 Hensley Street, Building 417 Richmond, CA 94801	1	2	3	4		IU	B				Consistent Compliance for the past 6 months.
Bay Area Rapid Transit 1281 Visalia Avenue Richmond, CA 94801	*	SI	SI*	SI*	7/12/2013 7/17/2013 7/17/2013 7/18/2013 7/18/2013 7/18/2013 7/18/2013	IU	B	pH Chart Cu Zn Cu Pb Ni Zn	8.0 9.1 11.0 0.85 0.45 31.0	Failure to maintain 0.65 1.0 0.65 0.3 0.27 1.0	NOV #121 issued on 07/19/13 for failure to maintain pH chart recorded [Blow-pit] NOV #131 issued on 8/8/13 [Blow-pit] NOV #131 issued on 8/8/13 [Blow-pit] NOV #122 issued on 07/25/13 required IU to cease discharge until further notice [Blow-pit] NOV #123 issued on 07/25/13 (see above) [Blow-pit] NOV #124 issued on 07/25/13 (see above) [Blow-pit] NOV #125 issued on 07/25/13 (see above) [Blow-pit] NOV #127 issued on 07/25/2013 for failure to prevent slug discharge to sanitary sewer [Blow-pit] NOV #128 issued on 07/25/2013 requiring BART to cease all discharges from blow-pit area until further notice from Control Authority *On a time schedule to comply
California Oils Corporation 1145 Harbour Way South Richmond, CA 94804	CC	CC	CC	IL	7/18/2013	IU	D				Consistent Compliance for the past 6 months.
West County Wastewater District (leachate discharge) 2377 Garden Tract Road Richmond, CA 94801	CC	CC	SI*	SI*		IU	B				IU will be removed as SIU effective January 1, 2014 per agreement with West County Wastewater District and the City of Richmond. West County will oversee leachate discharge from landfill. Consistent Compliance for the past 6 months
<p>(1) Compliance Status Key - #1 Most Recent Quarter SF - Significant Noncompliance, Federal Limits SI - Significant Noncompliance, Local Limits IF - Insignificant Noncompliance, Federal Limits IL - Insignificant Noncompliance, Local Limits ** Indicates a corrected compliance status report</p> <p>(2) Flow Key (gpd) State actual flow if known A. 0 - 9,999 B. 10,000 - 29,000 C. 30,000 - 49,000 D. 50,000 - 99,000 E. 100,000 +</p>											

I. BASELINE MONITORING REPORT SUMMARY

Baseline Monitoring Report (BMR) dates are found in Table 2a, for categorical IUs. The City does not use standardized BMR forms. The City sends a cover letter with a checklist to the CIU along with guidance on how to compose its own BMR. (Appendix I-1) No new CIUs were added to the pretreatment program this reporting period.

J. PRETREATMENT PROGRAM CHANGES

1). Legal Authority:

The City of Richmond has legal authority through its Sewer Use Ordinance (Appendix J-1) which states the following:

“This ordinance shall apply to all Users of the WPCP. The ordinance authorizes the issuance of individual and general wastewater discharge permits; provides for monitoring, compliance, and enforcement activities; establishes administrative review procedures; requires User reporting; and provides for the setting of fees for equitable distribution of costs resulting from the program established herein.”

2). Local Limits:

As part of its NPDES permit (Provision VI.C.4.a.(1)(d)), the City is required to conduct an evaluation within 180 days of the effective date of the NPDES permit to determine if there is a need to revise its local limits under 40 CFR Part 403.5(c)(1).

The City submitted a letter to the California Regional Water Quality Control Board San Francisco Bay Region on December 20, 2013 explaining the local limits evaluation that was conducted by Larry Walker & Associates on behalf of the City.

The City has consistently complied with the effluent limitations in the NPDES permit, and the Plant has not experienced process upset or pass-through of pollutants. Based on the information presented in that letter, the City determined that it was only necessary to update its local limit for Cyanide, which should be reduced to 0.26 mg/L from the current local limit of 0.29 mg/L. The reduction in the local limit for Cyanide is due to a small reduction in the monthly average effluent limitation in the 2013 NPDES permit when compared to the 2008 NPDES permit.

The City will modify its Sewer Use Ordinance to reflect the new Cyanide limit in March 2014. The City is required to hold a Public Hearing in order to satisfy the requirements of an updating an Ordinance.

3). Monitoring/Inspection Program and Frequency:

There were no significant changes to this program.

4). Enforcement Protocol:

The City's Industrial Pretreatment Program updated its Enforcement Response Plan (Appendix F-5) in February 2013. However, during the Pretreatment Program Audit, it

was determined that there were sections that were still inadequate. The City is revising the plan and will take it back to City Council for adoption Spring of 2014 .

5). Program's Administrative Structure:

The following positions are currently assigned to the General Manager of Richmond Municipal Sewer District:

- Source Control Superintendent (1 position) – vacant
- Source Control Inspector III (1 position) (Supervisor/Wastewater Budgeting/Sewer System Use Fee/Charges, Contract Management, SSO Reporting and Record Management, Source Control Program Reporting/Compliance and Record Management, Pollution Prevention Management, Private Lateral Maintenance and Grant Program, ensuring compliance with the City's Sewer System Management Plan – FOG Component)
- Source Control Inspector I/II (2 positions – vacant) (routine inspections, monitoring SIUs, IUs, Industrial User Surveys, etc.)

6). Staffing

The regulations in 40 CFR 403.8(f)(3) require that the POTW have qualified personnel and sufficient resources to carry out the authorities and procedures necessary for implementing its pretreatment program. Therefore the City is required to ensure that it has sufficient qualified staff to implement the pretreatment program.

Until mid-December, the City's Pretreatment Program had been fully staffed.

However, the following has taken place since that time:

- One Source Control Inspector failed to pass the required probationary period and was transferred to another department within the City.
- One Source Control Inspector resigned effective December 18, 2013.
- The City's part-time Source Control Inspector position was staffed by a contractor. The contract for that position expired December 31, 2013.

a) Budgeted Positions for the City's Pretreatment Program (Source Control/Wastewater)

The City has the following positions budgeted for 2013/14:

- 2 – Source Control Inspector I
- 1 – Source Control Inspector II
- 1 – Source Control Superintendent
- 1 – General Manager

b) Current Positions filled for the City's Pretreatment Program (Source Control)

- 1 – Source Control Inspector III
- 1 – General Manager

7). Resource Requirements

The City's contract laboratory expenses were approximately the same as in previous years and do not anticipate any significant increases. (Refer to Appendix K-2 for more information).

8). Funding Mechanism

This is discussed in "Section K. Pretreatment Program Budget".

9). Organizational Chart

See attached Organizational Chart (Appendix J-2)

10). Pretreatment Compliance Inspections and/or Audits

a) Unresolved (Recommended) Issues from PCI

During the inspection, City staff indicated that SIUs are now encouraged to electronically submit SMRs to the City as PDF files, in accordance with paperless administration principles. It is strongly recommended that the City either collect hard-copy reports from all its SIUs or notify EPA's Office of Environmental Information that the City is receiving electronic reports and to follow up with all applicable standards and requirements related to receiving such reports.

b) Plan(s) and Schedule for Resolving the Recommended Issues

The City is still working with a consultant to determine the requirements to comply with Cross-Media Electronic Reporting Regulation (CROMERR). In the meantime, all SIUs are submitting hard copies of self-monitoring reports until the City is compliant with the EPA's requirements regarding electronic report submittal. This item has also been discussed at the newly formed Pretreatment Committee of BACWA.

Hard copy files are maintained on site for review.

All other *recommendations* listed in the PCI have been resolved and/or completed.

c) Required Issues and Proposed Implementation Schedule from PCA

The following issues were required/recommended items from the City's last Pretreatment Compliance Audit (dated December 3 – 4, 2012):

Action Item	Proposed Schedule
Update Sewer Use Ordinance <ul style="list-style-type: none"> - Include definitions for indirect discharge and discharge - Provide legal authority for Enforcement Response Plan implementation - Update non-transferability language 	Spring 2014
Update Enforcement Response Plan <ul style="list-style-type: none"> - Update significant non-compliance definition 	Spring 2014
Determine Appropriate Permitting Mechanism for West County Landfill	Completed 01/21/2014
Review and Update Industrial User Permits <ul style="list-style-type: none"> - Correct categorical standards and local limits applied - Clarify monitoring requirements and frequencies or implement monitoring waivers - Require zero-discharge statement for zero-discharge industrial users - Non-transferability language - Include 30-day reporting requirement for re-samples for violations - Correct typographical errors 	Spring 2014
Review Sampling and Analysis Procedures with Industrial Users <ul style="list-style-type: none"> - Use of appropriate analytical methods - Adequate calibration of field meters - Representative sampling of discharge - Proper documentation of sampling in chain-of-custody forms 	Completed
Evaluate Need for Slug Discharge Control Plans <ul style="list-style-type: none"> - Require industrial users to submit slug discharge control plans if necessary - Ensure slug discharge control plans meet 40 CFR 403.8(f)(2)(vi) 	Completed
Implement Enforcement Response Plan	Completed and on-going

11). Other Program Changes

a) Database Management Update

The City entered into a contract with Linko® DataSystems, Inc. in July 2013 and went “live” in October 2013. All of the records for the Pretreatment Program are now stored in a web-based/managed software program.

It is the City's goal to have all of our self-monitoring Industries tender legal agreements to our City Attorney which will allow their monitoring data to be submitted, via their contract laboratory, directly into our Laboratory Information Management System

(LIMS). This will eliminate the need to manually enter the monitoring results saving hundreds of man-hours that can be better utilized to focus on other Pollutant Prevention/Reduction activities.

The goal for this last phase is early Summer 2014. In the meantime, data will still be manually entered.

b) Industrial User Sample Analyses Requests

The City and Veolia met to discuss the issues regarding receiving late lab data and the potential problems it presents (late NOVs, problems with IUs not knowing they are non-compliant, etc.).

It was agreed between the City and Veolia, that the contract lab Veolia uses will send the monitoring data (lab results) directly to the City and Veolia thus eliminating the need for Veolia to resend the monitoring data to the City.

This has improved the City's "turn-around" time for results immensely. The City is now receiving results within ten (10) to twenty (20) days instead of forty-five (45) to sixty (60) days.

c) Fats, Oils and Grease (FOG) Program

The City's Fats, Oils & Grease (FOG) Program Ordinance was adopted in January 31, 2006 and is included as part of the Sewer Use Ordinance City's (Richmond Municipal Code Chapter §12.18.030.2). There are currently 154 FOG facilities operating within the Richmond Municipal Sewer District.

The City inspected all FOG facilities operating within the Richmond Municipal Sewer District in 2013. In order to comply with the FOG component of the Sewer System Management Plan (SSMP), the City's goal will be to inspect each of these FOG facilities on an annual basis.

The City updated its FOG inspection form in 2013. (Appendix J-3).

K. PRETREATMENT PROGRAM BUDGET

Pretreatment Budgets are attached for 2012/13 and 2013/14 (Appendices K-1 and K-2). The budget for source control staffing (IPP) is solely to cover the inspector positions. All management level positions are funded from other wastewater enterprise fund budgets.

The number of person-years the past two years, new equipment purchased (including the City's current equipment inventory) are attached (Appendix K-3).

Each inspector is currently assigned their personal protective equipment (hard hat, safety glasses, gloves, boots, raingear, etc.). Safety Equipment is stored at the

Treatment Plant and is available as required (cones, signs, etc.).

This past year, the Pretreatment Program received two vehicles: one Ford® Escape (Hybrid SUV) and one Ford® F-150 truck. Each vehicle is equipped with the following basic equipment:

- Large metal Tool box (all necessary hand tools for field work)
- Sewer Hook (soon to be replaced with magnetic manhole cover removers)
- Knee pads, hard hats, disposable gloves

Funding is provided by sewer service charges, plan review fees, permits, and inspection fees. The City recovers the cost for the Regulation of Industries through permit and enforcement fees.

1). 2013 Major Purchases:

- Tablet personal computers (to be used with the Linko® database management system)
- 2 ISCO® samplers with newer, compact models
- Ford® F-150 Pick-up Truck
- Ford® Escape SUV

2). 2014 Planned Purchases:

- Magnetic manhole cover removal devices (will eliminate the use of the “hook”).
- Computerized pH meters (available through Beckman® or Orion®)
- 4-gas Gas detectors

L. PUBLIC PARTICIPATION SUMMARY

The public notice of significant non-compliance required by CFR 403.8(f)(2)(vii) for 2012 was published in the West County Times in March 2013 (Appendix L-1). The proposed list of violators that will be published in February 2014 is also included in this report (Appendix L-2).

M. BIOSOLIDS STORAGE AND DISPOSAL PRACTICES

Digested sludge from Richmond POTW is pumped to sludge drying lagoons managed by the West County Agency, and dewatered by supernatant removal and solar evaporation. All supernatant is returned at controlled volumes to the WCWD treatment plant to prevent overloading the system. After the end of the storm season, lagoons with the water removed begin drying quickly. By the beginning of September, when a crust forms on the surface, wide track tractors begin mechanically mixing it. Annual laboratory samples are taken from lagoons scheduled for annual emptying. The dried sludge is then applied to cover refuse at the adjacent Richmond Sanitary Landfill. This disposal practice is not affected by new USEPA Part 503 regulations.

An agreement with the WCWD was made establishing a lease agreement extending the use of the sludge drying beds by the City of Richmond on property owned by the

WCWD. The lease will extend the use by the City for up to eight years and was finalized in 2010. During this eight-year lease term, the City of Richmond will design and construct an alternative bio-solids dewatering facility. Updates on this project will be provided in future reports to the RWQCB.

N. OTHER POLLUTANT REDUCTION ACTIVITIES

These activities are reported in the Annual Pretreatment Pollution Prevention Report.

O. OTHER SUBJECTS

1) Sanitary Sewer Overflows

The Pretreatment Program continues to participate in untreated sewage spill response. The management of the City's sanitary, and stormwater collection system was contracted out to Veolia North America on October 15, 2004.

Veolia is responsible for responding to sewer line back-ups. Any Sanitary Sewer Overflow that is not classified as a private lateral sewer discharge (PLSD) is immediately reported to the City of Richmond Source Control Inspector.

The City Source Control Inspector is responsible for reporting the spill information to California Emergency Management Agency (CalEMA), and into CIWQS.

The City is no longer required to report Sanitary Sewer Overflows directly to the Regional Board. The Board has determined that the information reported to CalEMA and in CIWQS will serve as sufficient notification. The SSS-WDR was adopted September 9, 2013 and the requirements for reporting Sanitary Sewer Overflows have changed. The City is fully compliant with the new WDR. The City is not required to submit an annual SSO report to the State Water Quality Control Board. However, as a condition of the Settlement Agreement, the City is still required to submit an Annual SSO Report to Baykeeper. This report was submitted on March 29, 2013.

2). Sewer System Management Plan (SSMP)

The City has a Sewer System Management Plan (plan) as required by the Statewide General Discharge Requirements for Sanitary Sewer Systems – Order No. 2006-0003-DWQ (SSO – WDR). The City Council adopted an updated SSMP on October 15, 2013.

3). Lateral Grant (Private Lateral Maintenance) Program

The City continues to manage a private lateral maintenance program which became effective on August 25, 2006, along with the Private Sewer Lateral Grant program. The City is required to fund a minimum of \$100,000 for the program. This is a result of a settlement agreement amongst the City of Richmond, West County Wastewater District, the West County Toxics Coalition and Baykeeper.

Lateral Grant Applications are accepted until funds available for the fiscal year are exhausted, and the City will apply any excess funds to the following fiscal year's grant program. Only one grant per resident and per property will be awarded.

Due to the high demand and the positive impact of the Lateral Grant Program, the City Council unanimously voted to allocate \$300,000 to fund the program for 2013-14. The City awarded 217 grants in 2013.

P. Permit Compliance System (PCS) Data Entry Form

The PCS Data Entry Form is attached (Appendix P-1).

Q. Appendices

E-1 Influent and Effluent Lab Results for, Metals, PCBs and Cyanide

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Irvine

17461 Derian Ave

Suite 100

Irvine, CA 92614-5817

Tel: (949)261-1022

TestAmerica Job ID: 440-56997-1

Client Project/Site: SemiAnnual

For:

Veolia Water N. America Operating Svcs

601 Canal Blvd.

Richmond, California 94804

Attn: Jean McMahon



Authorized for release by:

9/26/2013 10:14:25 AM

Janice Hsu, Project Manager I

janice.hsu@testamericainc.com

The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Sample Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
440-56997-1	INF-002 Comp	Water	09/11/13 07:33	09/13/13 09:50
440-56997-2	EFF-002 Comp	Water	09/11/13 07:43	09/13/13 09:50
440-56997-3	EFF-001 Comp	Water	09/11/13 09:36	09/13/13 09:50
440-56997-4	INF-002 Grab	Water	09/11/13 12:50	09/13/13 09:50
440-56997-5	EFF-002 Grab	Water	09/11/13 13:16	09/13/13 09:50
440-56997-6	EFF-001 Grab	Water	09/11/13 13:25	09/13/13 09:50

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Case Narrative

TestAmerica Job ID: 440-56997-1

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

Job ID: 440-56997-1

Laboratory: TestAmerica Irvine

Narrative

Job Narrative
440-56997-1

Comments

No additional comments.

Receipt

The samples were received on 9/13/2013 9:50 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 1.4° C.

GC/MS Semi VOA

Method(s) 625: Insufficient sample volume was available to perform batch matrix spike/matrix spike duplicate (MS/MSD) associated with batch 131115. The laboratory control sample (LCS) was performed in duplicate to provide precision data for this batch.

Method(s) 625: The %RPD of the laboratory control sample (LCS) and laboratory control standard duplicate (LCSD) for preparation batch 131115 recovered outside control limits for bis(2-ethylhexyl)phthalate. The LCS/LCSD individual percent recoveries are within acceptance limits.

No other analytical or quality issues were noted.

GC Semi VOA

Method(s) 608: Insufficient sample volume was available to perform batch matrix spike/matrix spike duplicate (MS/MSD) associated with batch 130897 and 131084. The laboratory control sample (LCS) was performed in duplicate to provide precision data for this batch. (LCS 440-131084/4-A)

Method(s) 608: The following sample(s) required a copper clean-up to reduce matrix interferences caused by sulfur: (LCS 440-131084/4-A), (LCSD 440-131084/5-A), (MB 440-131084/1-A).

Method(s) 608: Insufficient sample volume was available to perform batch matrix spike/matrix spike duplicate (MS/MSD) associated with batch 131549. The laboratory control sample (LCS) was performed in duplicate to provide precision data for this batch.

No other analytical or quality issues were noted.

Metals

No analytical or quality issues were noted.

General Chemistry

No analytical or quality issues were noted.

Organic Prep

No analytical or quality issues were noted.



Client Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: INF-002 Comp

Lab Sample ID: 440-56997-1

Date Collected: 09/11/13 07:33

Matrix: Water

Date Received: 09/13/13 09:50

Method: 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	3.0		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:17	1
Cadmium	0.78	J	1.0	0.25	ug/L		09/16/13 11:07	09/16/13 20:17	1
Copper	53		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:17	1
Lead	4.1		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:17	1
Nickel	6.1		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:17	1
Silver	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:17	1
Zinc	150		20	5.0	ug/L		09/16/13 11:07	09/16/13 20:17	1

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Client Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: EFF-002 Comp

Lab Sample ID: 440-56997-2

Date Collected: 09/11/13 07:43

Matrix: Water

Date Received: 09/13/13 09:50

Method: 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	DII Fac
Arsenic	2.4		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:20	1
Cadmium	ND		1.0	0.25	ug/L		09/16/13 11:07	09/16/13 20:20	1
Copper	5.7		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:20	1
Lead	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:20	1
Nickel	3.5		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:20	1
Silver	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:20	1
Zinc	16	J	20	5.0	ug/L		09/16/13 11:07	09/16/13 20:20	1



Client Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: EFF-001 Comp

Lab Sample ID: 440-56997-3

Date Collected: 09/11/13 09:36

Matrix: Water

Date Received: 09/13/13 09:50

Method: 608 - Organochlorine Pesticides in Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Heptachlor	ND		0.010	0.0031	ug/L		09/17/13 10:25	09/18/13 15:34	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	55		35 - 115				09/17/13 10:25	09/18/13 15:34	1

Method: 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	6.1		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:22	1
Nickel	3.5		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 20:22	1

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Client Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: INF-002 Grab

Lab Sample ID: 440-56997-4

Date Collected: 09/11/13 12:50

Matrix: Water

Date Received: 09/13/13 09:50

Method: 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chromium	5.1	J B	10	2.5	ug/L		09/17/13 10:51	09/18/13 00:42	5

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Total	ND		5.0	3.0	ug/L		09/23/13 13:34	09/23/13 15:20	1
Ammonia (as N)	71		25	5.0	mg/L			09/14/13 06:48	50

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Client Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: EFF-002 Grab

Lab Sample ID: 440-56997-5

Date Collected: 09/11/13 13:16

Matrix: Water

Date Received: 09/13/13 09:50

Method: 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chromium	0.55	J B	2.0	0.50	ug/L		09/17/13 10:51	09/18/13 00:40	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Total	ND		5.0	3.0	ug/L		09/23/13 13:34	09/23/13 15:20	1
Ammonia (as N)	27		5.0	1.0	mg/L			09/14/13 06:46	10

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Client Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: EFF-001 Grab

Lab Sample ID: 440-56997-6

Date Collected: 09/11/13 13:25

Matrix: Water

Date Received: 09/13/13 09:50

Method: 625 - Semivolatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND	*	5.2	1.8	ug/L		09/14/13 12:01	09/18/13 23:53	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2,4,6-Tribromophenol	75		40 - 120				09/14/13 12:01	09/18/13 23:53	1
2-Fluorobiphenyl	52		50 - 120				09/14/13 12:01	09/18/13 23:53	1
2-Fluorophenol	52		30 - 120				09/14/13 12:01	09/18/13 23:53	1
Nitrobenzene-d5	62		45 - 120				09/14/13 12:01	09/18/13 23:53	1
Phenol-d6	59		35 - 120				09/14/13 12:01	09/18/13 23:53	1
Terphenyl-d14	66		37 - 144				09/14/13 12:01	09/18/13 23:53	1

Method: 608 - Organochlorine Pesticides in Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Endrin	ND		0.0052	0.0021	ug/L		09/17/13 10:25	09/18/13 15:49	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	61		35 - 115				09/17/13 10:25	09/18/13 15:49	1

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor 1016	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1221	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1232	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1242	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1248	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1254	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Aroclor 1260	ND		0.51	0.26	ug/L		09/14/13 07:23	09/16/13 15:30	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl (Surr)	107		45 - 120				09/14/13 07:23	09/16/13 15:30	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Total	ND		5.0	3.0	ug/L		09/24/13 11:52	09/24/13 17:12	1

Method Summary

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method	Method Description	Protocol	Laboratory
625	Semivolatile Organic Compounds (GC/MS)	EPA	TAL IRV
608	Organochlorine Pesticides in Water	40CFR136A	TAL IRV
608	Polychlorinated Biphenyls (PCBs) (GC)	40CFR136A	TAL IRV
200.8	Metals (ICP/MS)	EPA	TAL IRV
SM 4500 CN E	Cyanide, Total (Low Level)	SM	TAL IRV
SM 4500 NH3 D	Ammonia	SM	TAL IRV

Protocol References:

40CFR136A = "Methods for Organic Chemical Analysis of Municipal Industrial Wastewater", 40CFR, Part 136, Appendix A, October 26, 1984 and subsequent revisions.

EPA = US Environmental Protection Agency

SM = "Standard Methods For The Examination Of Water And Wastewater",

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022

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Lab Chronicle

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

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Client Sample ID: INF-002 Comp

Date Collected: 09/11/13 07:33
Date Received: 09/13/13 09:50

Lab Sample ID: 440-56997-1

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.2			50 mL	50 mL	131275	09/16/13 11:07	EN	TAL IRV
Total Recoverable	Analysis	200.8		1			131436	09/16/13 20:17	NH	TAL IRV

Client Sample ID: EFF-002 Comp

Date Collected: 09/11/13 07:43
Date Received: 09/13/13 09:50

Lab Sample ID: 440-56997-2

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.2			50 mL	50 mL	131275	09/16/13 11:07	EN	TAL IRV
Total Recoverable	Analysis	200.8		1			131436	09/16/13 20:20	NH	TAL IRV

Client Sample ID: EFF-001 Comp

Date Collected: 09/11/13 09:36
Date Received: 09/13/13 09:50

Lab Sample ID: 440-56997-3

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	608			965 mL	2 mL	131549	09/17/13 10:25	AC	TAL IRV
Total/NA	Analysis	608		1			131826	09/18/13 15:34	KS	TAL IRV
Total Recoverable	Prep	200.2			50 mL	50 mL	131275	09/16/13 11:07	EN	TAL IRV
Total Recoverable	Analysis	200.8		1			131436	09/16/13 20:22	NH	TAL IRV

Client Sample ID: INF-002 Grab

Date Collected: 09/11/13 12:50
Date Received: 09/13/13 09:50

Lab Sample ID: 440-56997-4

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.2			50 mL	50 mL	131557	09/17/13 10:51	ND	TAL IRV
Total Recoverable	Analysis	200.8		5			131810	09/18/13 00:42	NH	TAL IRV
Total/NA	Analysis	SM 4500 NH3 D		50	50 mL	50 mL	131085	09/14/13 06:48	YZ	TAL IRV
Total/NA	Prep	Distill/CN			50 mL	50 mL	132821	09/23/13 13:34	BS	TAL IRV
Total/NA	Analysis	SM 4500 CN E		1			132864	09/23/13 15:20	BS	TAL IRV

Client Sample ID: EFF-002 Grab

Date Collected: 09/11/13 13:16
Date Received: 09/13/13 09:50

Lab Sample ID: 440-56997-5

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.2			50 mL	50 mL	131557	09/17/13 10:51	ND	TAL IRV
Total Recoverable	Analysis	200.8		1			131810	09/18/13 00:40	NH	TAL IRV
Total/NA	Analysis	SM 4500 NH3 D		10	50 mL	50 mL	131085	09/14/13 06:46	YZ	TAL IRV
Total/NA	Prep	Distill/CN			50 mL	50 mL	132821	09/23/13 13:34	BS	TAL IRV
Total/NA	Analysis	SM 4500 CN E		1			132864	09/23/13 15:20	BS	TAL IRV

TestAmerica Irvine

Lab Chronicle

Client: Veolia Water N. America Operating Srvs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Client Sample ID: EFF-001 Grab

Lab Sample ID: 440-56997-6

Date Collected: 09/11/13 13:25

Matrix: Water

Date Received: 09/13/13 09:50

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	625			955 mL	2 mL	131115	09/14/13 12:01	AG	TAL IRV
Total/NA	Analysis	625		1			131805	09/18/13 23:53	DF	TAL IRV
Total/NA	Prep	608			975 mL	2 mL	131084	09/14/13 07:23	AC	TAL IRV
Total/NA	Analysis	608		1			131270	09/16/13 15:30	JM	TAL IRV
Total/NA	Prep	608			970 mL	2 mL	131549	09/17/13 10:25	AC	TAL IRV
Total/NA	Analysis	608		1			131826	09/18/13 15:49	KS	TAL IRV
Total/NA	Prep	Distill/CN			50 mL	50 mL	133105	09/24/13 11:52	BS	TAL IRV
Total/NA	Analysis	SM 4500 CN E		1			133201	09/24/13 17:12	BS	TAL IRV

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022



QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: 625 - Semivolatile Organic Compounds (GC/MS)

Lab Sample ID: MB 440-131115/1-A						Client Sample ID: Method Blank				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 131805						Prep Batch: 131115				
Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac	
Bis(2-ethylhexyl) phthalate	ND		5.0	1.7	ug/L		09/14/13 12:01	09/18/13 16:20	1	
Surrogate										
	MB %Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac	
2,4,6-Tribromophenol	96		40 - 120				09/14/13 12:01	09/18/13 16:20	1	
2-Fluorobiphenyl	74		50 - 120				09/14/13 12:01	09/18/13 16:20	1	
2-Fluorophenol	56		30 - 120				09/14/13 12:01	09/18/13 16:20	1	
Nitrobenzene-d5	68		45 - 120				09/14/13 12:01	09/18/13 16:20	1	
Phenol-d6	64		35 - 120				09/14/13 12:01	09/18/13 16:20	1	
Terphenyl-d14	78		37 - 144				09/14/13 12:01	09/18/13 16:20	1	

Lab Sample ID: LCS 440-131115/2-A						Client Sample ID: Lab Control Sample				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 131805						Prep Batch: 131115				
Analyte		Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
Bis(2-ethylhexyl) phthalate		10.0	10.7		ug/L		107	61 - 126		
Surrogate										
	LCS %Recovery	LCS Qualifier	Limits							
2,4,6-Tribromophenol	84		40 - 120							
2-Fluorobiphenyl	76		50 - 120							
2-Fluorophenol	59		30 - 120							
Nitrobenzene-d5	71		45 - 120							
Phenol-d6	66		35 - 120							
Terphenyl-d14	85		37 - 144							

Lab Sample ID: LCSD 440-131115/3-A						Client Sample ID: Lab Control Sample Dup				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 131805						Prep Batch: 131115				
Analyte		Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Bis(2-ethylhexyl) phthalate		10.0	7.99	*	ug/L		80	61 - 126	29	20
Surrogate										
	LCSD %Recovery	LCSD Qualifier	Limits							
2,4,6-Tribromophenol	86		40 - 120							
2-Fluorobiphenyl	74		50 - 120							
2-Fluorophenol	62		30 - 120							
Nitrobenzene-d5	79		45 - 120							
Phenol-d6	70		35 - 120							
Terphenyl-d14	82		37 - 144							

QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: 608 - Organochlorine Pesticides in Water

Lab Sample ID: MB 440-131549/1-A
Matrix: Water
Analysis Batch: 131826

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 131549

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Heptachlor	ND		0.010	0.0030	ug/L		09/17/13 10:25	09/18/13 14:50	1
Endrin	ND		0.0050	0.0020	ug/L		09/17/13 10:25	09/18/13 14:50	1
MB MB									
Surrogate	%Recovery	Qualifier	Limits		Prepared		Analyzed		Dil Fac
Tetrachloro-m-xylene	56		35 - 115		09/17/13 10:25		09/18/13 14:50		1

Lab Sample ID: LCS 440-131549/2-A
Matrix: Water
Analysis Batch: 131826

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 131549

Analyte	Spike Added	LCS LCS		Unit	D	%Rec	%Rec. Limits		
		Result	Qualifier				Limits		
Heptachlor	0.500	0.353		ug/L		71	45 - 115		
Endrin	0.500	0.402		ug/L		80	55 - 115		
LCS LCS									
Surrogate	%Recovery	Qualifier	Limits						
Tetrachloro-m-xylene	59		35 - 115						

Lab Sample ID: LCSD 440-131549/3-A
Matrix: Water
Analysis Batch: 131826

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 131549

Analyte	Spike Added	LCSD LCSD		Unit	D	%Rec	%Rec. Limits		RPD Limit		
		Result	Qualifier				Limits		RPD	Limit	
Heptachlor	0.500	0.286		ug/L		57	45 - 115		21	30	
Endrin	0.500	0.352		ug/L		70	55 - 115		13	30	
LCSD LCSD											
Surrogate	%Recovery	Qualifier	Limits								
Tetrachloro-m-xylene	45		35 - 115								

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC)

Lab Sample ID: MB 440-131084/1-A
Matrix: Water
Analysis Batch: 131270

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 131084

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Aroclor 1016	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1221	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1232	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1242	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1248	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1254	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
Aroclor 1260	ND		0.50	0.25	ug/L		09/14/13 07:23	09/16/13 17:00	1
MB MB									
Surrogate	%Recovery	Qualifier	Limits		Prepared		Analyzed		Dil Fac
DCB Decachlorobiphenyl (Surr)	105		45 - 120		09/14/13 07:23		09/16/13 17:00		1

TestAmerica Irvine

QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC) (Continued)

Lab Sample ID: LCS 440-131084/4-A
Matrix: Water
Analysis Batch: 131270

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 131084

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Aroclor 1016	4.00	3.16		ug/L		79	50 - 115
Aroclor 1260	4.00	3.56		ug/L		89	60 - 120

Surrogate	LCS %Recovery	LCS Qualifier	Limits
DCB Decachlorobiphenyl (Surr)	112		45 - 120

Lab Sample ID: LCSD 440-131084/5-A
Matrix: Water
Analysis Batch: 131270

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 131084

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
Aroclor 1016	4.00	3.15		ug/L		79	50 - 115	0	30
Aroclor 1260	4.00	3.60		ug/L		90	60 - 120	1	25

Surrogate	LCSD %Recovery	LCSD Qualifier	Limits
DCB Decachlorobiphenyl (Surr)	111		45 - 120

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 440-131275/1-A
Matrix: Water
Analysis Batch: 131436

Client Sample ID: Method Blank
Prep Type: Total Recoverable
Prep Batch: 131275

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 19:21	1
Cadmium	ND		1.0	0.25	ug/L		09/16/13 11:07	09/16/13 19:21	1
Lead	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 19:21	1
Copper	ND		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 19:21	1
Nickel	ND		2.0	0.50	ug/L		09/16/13 11:07	09/16/13 19:21	1
Silver	ND		1.0	0.50	ug/L		09/16/13 11:07	09/16/13 19:21	1
Zinc	ND		20	5.0	ug/L		09/16/13 11:07	09/16/13 19:21	1

Lab Sample ID: LCS 440-131275/2-A
Matrix: Water
Analysis Batch: 131436

Client Sample ID: Lab Control Sample
Prep Type: Total Recoverable
Prep Batch: 131275

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Arsenic	80.0	79.9		ug/L		100	85 - 115
Cadmium	80.0	79.0		ug/L		99	85 - 115
Lead	80.0	78.8		ug/L		98	85 - 115
Copper	80.0	80.5		ug/L		101	85 - 115
Nickel	80.0	80.4		ug/L		101	85 - 115
Silver	80.0	79.8		ug/L		100	85 - 115
Zinc	80.0	76.8		ug/L		96	85 - 115

TestAmerica Irvine

QC Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: 200.8 - Metals (ICP/MS) (Continued)

Lab Sample ID: 440-56783-F-4-C MS
Matrix: Water
Analysis Batch: 131436

Client Sample ID: Matrix Spike
Prep Type: Total Recoverable
Prep Batch: 131275

Analyte	Sample	Sample	Spike	MS		Unit	D	%Rec	%Rec.	
	Result	Qualifier		Result	Qualifier				Limits	
Arsenic	1.7		80.0	81.1		ug/L		99	70 - 130	
Cadmium	ND		80.0	72.0		ug/L		90	70 - 130	
Lead	ND		80.0	78.0		ug/L		97	70 - 130	
Copper	7.0		80.0	75.2		ug/L		85	70 - 130	
Nickel	2.0		80.0	65.4		ug/L		79	70 - 130	
Silver	ND		80.0	72.6		ug/L		91	70 - 130	
Zinc	8.0	J	80.0	73.9		ug/L		82	70 - 130	

Lab Sample ID: 440-56783-F-4-D MSD
Matrix: Water
Analysis Batch: 131436

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total Recoverable
Prep Batch: 131275

Analyte	Sample	Sample	Spike	MSD		Unit	D	%Rec	%Rec.		RPD	
	Result	Qualifier		Result	Qualifier				Limits	RPD	Limit	
Arsenic	1.7		80.0	81.2		ug/L		99	70 - 130	0	20	
Cadmium	ND		80.0	71.5		ug/L		89	70 - 130	1	20	
Lead	ND		80.0	78.9		ug/L		99	70 - 130	1	20	
Copper	7.0		80.0	75.2		ug/L		85	70 - 130	0	20	
Nickel	2.0		80.0	65.2		ug/L		79	70 - 130	0	20	
Silver	ND		80.0	72.6		ug/L		91	70 - 130	0	20	
Zinc	8.0	J	80.0	73.2		ug/L		82	70 - 130	1	20	

Lab Sample ID: MB 440-131557/1-A
Matrix: Water
Analysis Batch: 131810

Client Sample ID: Method Blank
Prep Type: Total Recoverable
Prep Batch: 131557

Analyte	MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil	Fac
	Result	Qualifier								
Chromium	0.620	J	2.0	0.50	ug/L		09/17/13 10:51	09/18/13 00:26		1

Lab Sample ID: LCS 440-131557/2-A
Matrix: Water
Analysis Batch: 131810

Client Sample ID: Lab Control Sample
Prep Type: Total Recoverable
Prep Batch: 131557

Analyte	Spike	LCS		Unit	D	%Rec	%Rec.	
		Result	Qualifier				Limits	
Chromium	80.0	79.3		ug/L		99	85 - 115	

Lab Sample ID: 440-56997-3 MS
Matrix: Water
Analysis Batch: 131810

Client Sample ID: EFF-001 Comp
Prep Type: Total Recoverable
Prep Batch: 131557

Analyte	Sample	Sample	Spike	MS		Unit	D	%Rec	%Rec.	
	Result	Qualifier		Result	Qualifier				Limits	
Chromium	0.58		80.0	73.5		ug/L		91	70 - 130	

Lab Sample ID: 440-56997-3 MSD
Matrix: Water
Analysis Batch: 131810

Client Sample ID: EFF-001 Comp
Prep Type: Total Recoverable
Prep Batch: 131557

Analyte	Sample	Sample	Spike	MSD		Unit	D	%Rec	%Rec.		RPD	
	Result	Qualifier		Result	Qualifier				Limits	RPD	Limit	
Chromium	0.58		80.0	74.4		ug/L		92	70 - 130	1	20	

TestAmerica Irvine



QC Sample Results

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: SM 4500 CN E - Cyanide, Total (Low Level)

Lab Sample ID: MB 440-132821/1-A Matrix: Water Analysis Batch: 132864						Client Sample ID: Method Blank Prep Type: Total/NA Prep Batch: 132821				
Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac	
Cyanide, Total	ND		5.0	3.0	ug/L		09/23/13 13:34	09/23/13 15:19	1	

Lab Sample ID: LCS 440-132821/2-A Matrix: Water Analysis Batch: 132864						Client Sample ID: Lab Control Sample Prep Type: Total/NA Prep Batch: 132821				
Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits			
Cyanide, Total	100	109		ug/L		109	90 - 110			

Lab Sample ID: MB 440-133105/1-A Matrix: Water Analysis Batch: 133201						Client Sample ID: Method Blank Prep Type: Total/NA Prep Batch: 133105				
Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac	
Cyanide, Total	ND		5.0	3.0	ug/L		09/24/13 11:52	09/24/13 17:12	1	

Lab Sample ID: LCS 440-133105/2-A Matrix: Water Analysis Batch: 133201						Client Sample ID: Lab Control Sample Prep Type: Total/NA Prep Batch: 133105				
Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits			
Cyanide, Total	100	101		ug/L		101	90 - 110			

Lab Sample ID: 440-57345-H-2-B MS Matrix: Water Analysis Batch: 132864						Client Sample ID: Matrix Spike Prep Type: Dissolved Prep Batch: 132821				
Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits	
Cyanide, Total	ND		100	104		ug/L		104	70 - 115	

Lab Sample ID: 440-57345-H-2-C MSD Matrix: Water Analysis Batch: 132864						Client Sample ID: Matrix Spike Duplicate Prep Type: Dissolved Prep Batch: 132821					
Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
Cyanide, Total	ND		100	109		ug/L		109	70 - 115	5	15

Lab Sample ID: 440-57475-H-2-B MS Matrix: Water Analysis Batch: 133201						Client Sample ID: Matrix Spike Prep Type: Dissolved Prep Batch: 133105				
Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits	
Cyanide, Total	ND		100	103		ug/L		103	70 - 115	

Lab Sample ID: 440-57475-H-2-C MSD Matrix: Water Analysis Batch: 133201						Client Sample ID: Matrix Spike Duplicate Prep Type: Dissolved Prep Batch: 133105					
Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
Cyanide, Total	ND		100	103		ug/L		103	70 - 115	1	15

TestAmerica Irvine



QC Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Method: SM 4500 NH3 D - Ammonia

Lab Sample ID: MB 440-131085/9
 Matrix: Water
 Analysis Batch: 131085

Client Sample ID: Method Blank
 Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (as N)	ND		0.50	0.10	mg/L			09/14/13 06:21	1

Lab Sample ID: LCS 440-131085/8
 Matrix: Water
 Analysis Batch: 131085

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Ammonia (as N)	1.00	0.988		mg/L		99	85 - 115

Lab Sample ID: 440-56912-A-1 MS
 Matrix: Water
 Analysis Batch: 131085

Client Sample ID: Matrix Spike
 Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Ammonia (as N)	0.46	J	2.00	2.60		mg/L		107	75 - 125

Lab Sample ID: 440-56912-A-1 MSD
 Matrix: Water
 Analysis Batch: 131085

Client Sample ID: Matrix Spike Duplicate
 Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Ammonia (as N)	0.46	J	2.00	2.50		mg/L		102	75 - 125	4	15

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QC Association Summary

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

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GC/MS Semi VOA

Prep Batch: 131115

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	625	
LCS 440-131115/2-A	Lab Control Sample	Total/NA	Water	625	
LCS 440-131115/3-A	Lab Control Sample Dup	Total/NA	Water	625	
MB 440-131115/1-A	Method Blank	Total/NA	Water	625	

Analysis Batch: 131805

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	625	131115
LCS 440-131115/2-A	Lab Control Sample	Total/NA	Water	625	131115
LCS 440-131115/3-A	Lab Control Sample Dup	Total/NA	Water	625	131115
MB 440-131115/1-A	Method Blank	Total/NA	Water	625	131115

GC Semi VOA

Prep Batch: 131084

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	608	
LCS 440-131084/4-A	Lab Control Sample	Total/NA	Water	608	
LCS 440-131084/5-A	Lab Control Sample Dup	Total/NA	Water	608	
MB 440-131084/1-A	Method Blank	Total/NA	Water	608	

Analysis Batch: 131270

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	608	131084
LCS 440-131084/4-A	Lab Control Sample	Total/NA	Water	608	131084
LCS 440-131084/5-A	Lab Control Sample Dup	Total/NA	Water	608	131084
MB 440-131084/1-A	Method Blank	Total/NA	Water	608	131084

Prep Batch: 131549

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-3	EFF-001 Comp	Total/NA	Water	608	
440-56997-6	EFF-001 Grab	Total/NA	Water	608	
LCS 440-131549/2-A	Lab Control Sample	Total/NA	Water	608	
LCS 440-131549/3-A	Lab Control Sample Dup	Total/NA	Water	608	
MB 440-131549/1-A	Method Blank	Total/NA	Water	608	

Analysis Batch: 131826

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-3	EFF-001 Comp	Total/NA	Water	608	131549
440-56997-6	EFF-001 Grab	Total/NA	Water	608	131549
LCS 440-131549/2-A	Lab Control Sample	Total/NA	Water	608	131549
LCS 440-131549/3-A	Lab Control Sample Dup	Total/NA	Water	608	131549
MB 440-131549/1-A	Method Blank	Total/NA	Water	608	131549

Metals

Prep Batch: 131275

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56783-F-4-C MS	Matrix Spike	Total Recoverable	Water	200.2	
440-56783-F-4-D MSD	Matrix Spike Duplicate	Total Recoverable	Water	200.2	

TestAmerica Irvine

QC Association Summary

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Metals (Continued)

Prep Batch: 131275 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-1	INF-002 Comp	Total Recoverable	Water	200.2	
440-56997-2	EFF-002 Comp	Total Recoverable	Water	200.2	
440-56997-3	EFF-001 Comp	Total Recoverable	Water	200.2	
LCS 440-131275/2-A	Lab Control Sample	Total Recoverable	Water	200.2	
MB 440-131275/1-A	Method Blank	Total Recoverable	Water	200.2	

Analysis Batch: 131436

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56783-F-4-C MS	Matrix Spike	Total Recoverable	Water	200.8	131275
440-56783-F-4-D MSD	Matrix Spike Duplicate	Total Recoverable	Water	200.8	131275
440-56997-1	INF-002 Comp	Total Recoverable	Water	200.8	131275
440-56997-2	EFF-002 Comp	Total Recoverable	Water	200.8	131275
440-56997-3	EFF-001 Comp	Total Recoverable	Water	200.8	131275
LCS 440-131275/2-A	Lab Control Sample	Total Recoverable	Water	200.8	131275
MB 440-131275/1-A	Method Blank	Total Recoverable	Water	200.8	131275

Prep Batch: 131557

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-3 MS	EFF-001 Comp	Total Recoverable	Water	200.2	
440-56997-3 MSD	EFF-001 Comp	Total Recoverable	Water	200.2	
440-56997-4	INF-002 Grab	Total Recoverable	Water	200.2	
440-56997-5	EFF-002 Grab	Total Recoverable	Water	200.2	
LCS 440-131557/2-A	Lab Control Sample	Total Recoverable	Water	200.2	
MB 440-131557/1-A	Method Blank	Total Recoverable	Water	200.2	

Analysis Batch: 131810

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-3 MS	EFF-001 Comp	Total Recoverable	Water	200.8	131557
440-56997-3 MSD	EFF-001 Comp	Total Recoverable	Water	200.8	131557
440-56997-4	INF-002 Grab	Total Recoverable	Water	200.8	131557
440-56997-5	EFF-002 Grab	Total Recoverable	Water	200.8	131557
LCS 440-131557/2-A	Lab Control Sample	Total Recoverable	Water	200.8	131557
MB 440-131557/1-A	Method Blank	Total Recoverable	Water	200.8	131557

General Chemistry

Analysis Batch: 131085

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56912-A-1 MS	Matrix Spike	Total/NA	Water	SM 4500 NH3 D	
440-56912-A-1 MSD	Matrix Spike Duplicate	Total/NA	Water	SM 4500 NH3 D	
440-56997-4	INF-002 Grab	Total/NA	Water	SM 4500 NH3 D	
440-56997-5	EFF-002 Grab	Total/NA	Water	SM 4500 NH3 D	
LCS 440-131085/8	Lab Control Sample	Total/NA	Water	SM 4500 NH3 D	
MB 440-131085/9	Method Blank	Total/NA	Water	SM 4500 NH3 D	

Prep Batch: 132821

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-4	INF-002 Grab	Total/NA	Water	Distill/CN	
440-56997-5	EFF-002 Grab	Total/NA	Water	Distill/CN	
440-57345-H-2-B MS	Matrix Spike	Dissolved	Water	Distill/CN	

TestAmerica Irvine



QC Association Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

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General Chemistry (Continued)

Prep Batch: 132821 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57345-H-2-C MSD	Matrix Spike Duplicate	Dissolved	Water	Distill/CN	
LCS 440-132821/2-A	Lab Control Sample	Total/NA	Water	Distill/CN	
MB 440-132821/1-A	Method Blank	Total/NA	Water	Distill/CN	

Analysis Batch: 132864

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-4	INF-002 Grab	Total/NA	Water	SM 4500 CN E	132821
440-56997-5	EFF-002 Grab	Total/NA	Water	SM 4500 CN E	132821
440-57345-H-2-B MS	Matrix Spike	Dissolved	Water	SM 4500 CN E	132821
440-57345-H-2-C MSD	Matrix Spike Duplicate	Dissolved	Water	SM 4500 CN E	132821
LCS 440-132821/2-A	Lab Control Sample	Total/NA	Water	SM 4500 CN E	132821
MB 440-132821/1-A	Method Blank	Total/NA	Water	SM 4500 CN E	132821

Prep Batch: 133105

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	Distill/CN	
440-57475-H-2-B MS	Matrix Spike	Dissolved	Water	Distill/CN	
440-57475-H-2-C MSD	Matrix Spike Duplicate	Dissolved	Water	Distill/CN	
LCS 440-133105/2-A	Lab Control Sample	Total/NA	Water	Distill/CN	
MB 440-133105/1-A	Method Blank	Total/NA	Water	Distill/CN	

Analysis Batch: 133201

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56997-6	EFF-001 Grab	Total/NA	Water	SM 4500 CN E	133105
440-57475-H-2-B MS	Matrix Spike	Dissolved	Water	SM 4500 CN E	133105
440-57475-H-2-C MSD	Matrix Spike Duplicate	Dissolved	Water	SM 4500 CN E	133105
LCS 440-133105/2-A	Lab Control Sample	Total/NA	Water	SM 4500 CN E	133105
MB 440-133105/1-A	Method Blank	Total/NA	Water	SM 4500 CN E	133105

Definitions/Glossary

Client: Veolia Water N. America Operating Svcs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Qualifiers

GC/MS Semi VOA

Qualifier	Qualifier Description
*	RPD of the LCS and LCSD exceeds the control limits

Metals

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
B	Compound was found in the blank and sample.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
▫	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Certification Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: SemiAnnual

TestAmerica Job ID: 440-56997-1

Laboratory: TestAmerica Irvine

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Alaska	State Program	10	CA01531	06-30-14
Arizona	State Program	9	AZ0671	10-13-13
California	LA Cty Sanitation Districts	9	10256	01-31-14
California	NELAP	9	1108CA	01-31-14
California	State Program	9	2706	06-30-14
Guam	State Program	9	Cert. No. 12.002r	01-28-14 *
Hawaii	State Program	9	N/A	01-31-14
Nevada	State Program	9	CA015312007A	07-31-14
New Mexico	State Program	6	N/A	01-31-14
Northern Mariana Islands	State Program	9	MP0002	01-31-14
USDA	Federal		P330-09-00080	06-06-14
USEPA UCMR	Federal	1	CA01531	01-31-15

* Expired certification is currently pending renewal and is considered valid.

TestAmerica Irvine



TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

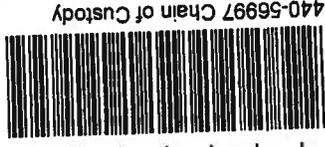
TAL-0013 (0911)

CHAIN OF CUSTODY FORM

17461 Derian Ave., #100, Irvine, CA 92614 (949) 261-1022 FAX (949) 260-3287
 1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4687 FAX (909) 370-1048
 4625 E. Cotton Center Blvd., Suite 189, Phoenix, AZ 85040 (602) 437-3340 FAX (602) 454-8303
 6000 S. Eastern Ave., Suite 5E, Las Vegas, NV 89119 (702) 428-1284

Page 1 of 1

Client Name / Address: Valoia Water 601 Canal Blvd. Richmond CA 94804	Project/PO Number: Semi Annual	Sample Matrix	Container Type	# of Cont.	Sampling Date	Sampling Time	Preservatives	Analysis Required						Special Instructions					
								Metals: Cd, Pb, Ni, Ag, Zn	Metals: As, Cr, Ni	Ammonia	Bis 2 (ethylhexyl) phthalate	608 PCBs & Dieldrin	Endrin		GN- Composit				
Project Manager: Jean McMahon Sampler: ops; JS & VL	Phone Number: 570-412-2001 Fax Number:	AQ	PE	1	9/10/11/13	0733	HNO3												
		AQ	PE	1	↓	0743	↓												
		AQ	PE	1	8/10-11/13	0936	HNO3												
		↓	AL	2	↓	↓	46°C												
		AQ	PE	1	9/11/13	1250	HNO3												
		AQ	PE	1	9/11/13	1316	↓												
		AQ	PE	1	↓	↓	H2SO4												
		AQ	PE	1	9/11/13	1250	↓												
		AQ	AL	2	9/11/13	1325	46°C												
		↓	AL	3	↓	↓	↓												
		AQ	PE	1	9/11/13	1250	NaOH												
		AQ	PE	1	9/11/13	1316	NaOH												
		AQ	PE	1	9/11/13	1325	NaOH												
Relinquished By: Victoria C. Gray	Date/Time: 9/12/13 1140																Received By: [Signature]	Date/Time: 9/13/13 1146	Turnaround Time: (Check) same day 72 hours
Relinquished By: ZSC [Signature]	Date/Time: 9/12/13 1620																Received By: [Signature]	Date/Time: 9/13/13 1620	Turnaround Time: (Check) 24 hours 5 days 48 hours normal
Relinquished By: [Signature]	Date/Time: [Signature]																Received By: [Signature]	Date/Time: 9-13-13 950	Sample Integrity: (Check) intact on ice



Note: By relinquishing samples to TestAmerica, client agrees to pay for the services requested on this chain of custody form and any additional analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 30 days.

1.66 | 1.4

Login Sample Receipt Checklist

Client: Veolia Water N. America Operating Srvs

Job Number: 440-56997-1

Login Number: 56997

List Source: TestAmerica Irvine

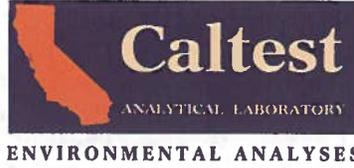
List Number: 1

Creator: Chavez, Elizabeth

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	OPS; JS & VL
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <math><6\text{mm}</math> (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	N/A	
Residual Chlorine Checked.	N/A	



**E-2 Influent and Effluent Lab Results for Volatile Organics, Selenium,
and Mercury**



Appendix E-2

Tuesday, September 24, 2013

Jean McMahon
Veolia Water / Richmond
601 Canal Boulevard
Richmond, CA 94804

RE: Lab Order: N090461
Project ID: SEMI-ANNUAL

Collected By: OPS JS & VL
PO/Contract #:

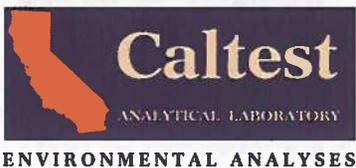
Dear Jean McMahon:

Enclosed are the analytical results for sample(s) received by the laboratory on Wednesday, September 11, 2013. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Enclosures

Project Manager: Danielle Regan

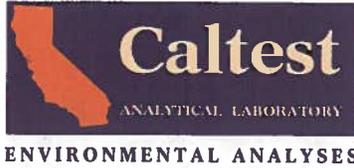


SAMPLE SUMMARY

Lab Order: N090461
 Project ID: SEMI-ANNUAL

Lab ID	Sample ID	Matrix	Date Collected	Date Received
N090461001	INF-002	Water	9/11/2013 07:33	9/11/2013 15:06
N090461002	EFF-002	Water	9/11/2013 07:43	9/11/2013 15:06
N090461003	INF-002	Water	9/11/2013 12:50	9/11/2013 15:06
N090461004	EFF-002	Water	9/11/2013 13:16	9/11/2013 15:06
N090461005	EFF-001	Water	9/11/2013 13:25	9/11/2013 15:06
N090461006	FIELD BLANK	Water	9/11/2013 13:25	9/11/2013 15:06
N090461007	INF-002	Water	9/11/2013 12:50	9/11/2013 15:06
N090461008	EFF-002	Water	9/11/2013 13:16	9/11/2013 15:06





NARRATIVE

Lab Order: N090461
 Project ID: SEMI-ANNUAL

General Qualifiers and Notes

Caltest authorizes this report to be reproduced only in its entirety. Results are specific to the sample(s) as submitted and only to the parameter(s) reported.

Caltest certifies that all test results for wastewater and hazardous waste analyses meet all applicable NELAC requirements; all microbiology and drinking water testing meet applicable ELAP requirements, unless stated otherwise.

All analyses performed by EPA Methods or Standard Methods (SM) 20th Edition except where noted (SMOL=online edition).

Caltest collects samples in compliance with 40 CFR, EPA Methods, Cal. Title 22, and Standard Methods.

Dilution Factors (DF) reported greater than '1' have been used to adjust the result, Reporting Limit (RL), and Method Detection Limit (MDL).

All Solid, sludge, and/or biosolids data is reported in Wet Weight, unless otherwise specified.

Filtrations performed at Caltest for dissolved metals (excluding mercury) and/or pH analysis were not performed within the 15 minute holding time as specified by 40CFR 136.3 table II.

Results Qualifiers: Report fields may contain codes and non-numeric data correlating to one or more of the following definitions:

ND - Non Detect - indicates analytical result has not been detected.

RL - Reporting Limit is the quantitation limit at which the laboratory is able to detect an analyte. An analyte not detected at or above the RL is reported as ND unless otherwise noted or qualified. For analyses pertaining to the State Implementation Plan of the California Toxics Rule, the Caltest Reporting Limit (RL) is equivalent to the Minimum Level (ML). A standard is always run at or below the ML. Where Reporting Limits are elevated due to dilution, the ML calibration criteria has been met.

J - reflects estimated analytical result value detected below the Reporting Limit (RL) and above the Method Detection Limit (MDL). The 'J' flag is equivalent to the DNQ Estimated Concentration flag.

E - indicates an estimated analytical result value.

B - indicates the analyte has been detected in the blank associated with the sample.

NC - means not able to be calculated for RPD or Spike Recoveries.

SS - compound is a Surrogate Spike used per laboratory quality assurance manual.

NOTE: This document represents a complete Analytical Report for the samples referenced herein and should be retained as a permanent record thereof.

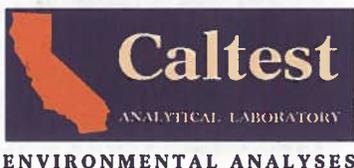
Workorder Notes

Client canceled analysis for Mercury by EPA 1631 on N090461005 & N090461006. Will be resampled.

Qualifiers and Compound Notes

- 1 Sample diluted prior to analysis in an effort to reduce matrix interferences resulting in higher reporting limit(s).
- 2 Analyte(s) reported as 'ND' means not detected at or above the listed Method Detection Limits (MDL).





ANALYTICAL RESULTS

Lab Order: N090461
 Project ID SEMI-ANNUAL

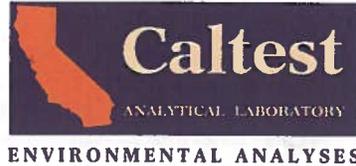
Lab ID: N090461001	Date Collected: 9/11/2013 07:33	Matrix: Water						
Sample ID: INF-002	Date Received: 9/11/2013 15:06							
Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Metals by ICPMS Collision Mode, Total	Prep Method: EPA 200.8	Analytical Method: EPA 200.8		Prep by: UK		Analyzed by: SMD		
Selenium (reaction cell)	J0.58 ug/L	1.0	0.060	1	09/19/13 00:00	MPR 12202	09/20/13 17:35	MMS 6948

Lab ID: N090461002	Date Collected: 9/11/2013 07:43	Matrix: Water						
Sample ID: EFF-002	Date Received: 9/11/2013 15:06							
Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Metals by ICPMS Collision Mode, Total	Prep Method: EPA 200.8	Analytical Method: EPA 200.8		Prep by: UK		Analyzed by: SMD		
Selenium (reaction cell)	J0.40 ug/L	1.0	0.060	1	09/19/13 00:00	MPR 12202	09/20/13 17:40	MMS 6948

Lab ID: N090461003	Date Collected: 9/11/2013 12:50	Matrix: Water						
Sample ID: INF-002	Date Received: 9/11/2013 15:06							
Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Mercury Analysis by FIMS, Low Level	Prep Method: EPA 245.1	Analytical Method: EPA 245.1, Low Level		Prep by: UK		Analyzed by: LM		
Mercury	0.091 ug/L	0.050	0.0080	1	09/17/13 00:00	MPR 12198	09/18/13 11:55	MHG 4398

Lab ID: N090461004	Date Collected: 9/11/2013 13:16	Matrix: Water						
Sample ID: EFF-002	Date Received: 9/11/2013 15:06							
Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Mercury Analysis, Trace Level	Prep Method: EPA 1631E	Analytical Method: EPA 1631E		Prep by: UK		Analyzed by: LM		
Mercury	0.0082 ug/L	0.0005	0.00020	1	09/16/13 00:00	MPR 12193	09/17/13 09:48	MHG 4396





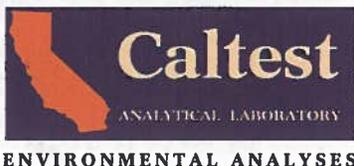
ANALYTICAL RESULTS

Lab Order: N090461

Project ID SEMI-ANNUAL

Lab ID: N090461007 Date Collected: 9/11/2013 12:50 Matrix: Water
 Sample ID: INF-002 Date Received: 9/11/2013 15:06

Parameters	Result	Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Volatile Organic Analysis			Analytical Method: EPA 624			Analyzed by: AN			
Acrolein	ND	ug/L	20	8.5	5		09/13/13 22:05	VMS 2925	1
Acrylonitrile	ND	ug/L	10	5.0	5		09/13/13 22:05	VMS 2925	
Benzene	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
Bromodichloromethane	ND	ug/L	2.5	0.80	5		09/13/13 22:05	VMS 2925	
Bromoform	ND	ug/L	2.5	1.0	5		09/13/13 22:05	VMS 2925	
Bromomethane (Methyl Bromide)	ND	ug/L	2.5	0.85	5		09/13/13 22:05	VMS 2925	
Carbon tetrachloride	ND	ug/L	2.5	0.80	5		09/13/13 22:05	VMS 2925	
Chlorobenzene	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
Chloroethane (Ethyl Chloride)	ND	ug/L	2.5	1.9	5		09/13/13 22:05	VMS 2925	
2-Chloroethyl vinyl ether	ND	ug/L	5.0	1.4	5		09/13/13 22:05	VMS 2925	
Chloroform	7.7	ug/L	2.5	0.95	5		09/13/13 22:05	VMS 2925	
Chloromethane(Methyl Chloride)	ND	ug/L	2.5	1.2	5		09/13/13 22:05	VMS 2925	
Dibromochloromethane	ND	ug/L	2.5	0.85	5		09/13/13 22:05	VMS 2925	
1,2-Dichlorobenzene	ND	ug/L	2.5	1.4	5		09/13/13 22:05	VMS 2925	
1,3-Dichlorobenzene	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
1,4-Dichlorobenzene	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
Dichlorodifluoromethane (F-12)	ND	ug/L	2.5	1.5	5		09/13/13 22:05	VMS 2925	
1,1-Dichloroethane	ND	ug/L	2.5	0.95	5		09/13/13 22:05	VMS 2925	
1,2-Dichloroethane (EDC)	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
1,1-Dichloroethene	ND	ug/L	2.5	1.0	5		09/13/13 22:05	VMS 2925	
cis-1,2-Dichloroethene	ND	ug/L	2.5	1.0	5		09/13/13 22:05	VMS 2925	
trans-1,2-Dichloroethene	ND	ug/L	2.5	1.1	5		09/13/13 22:05	VMS 2925	
1,2-Dichloropropane	ND	ug/L	2.5	0.90	5		09/13/13 22:05	VMS 2925	
cis-1,3-Dichloropropene	ND	ug/L	2.5	0.80	5		09/13/13 22:05	VMS 2925	
trans-1,3-Dichloropropene	ND	ug/L	2.5	0.80	5		09/13/13 22:05	VMS 2925	
1,3-Dichloropropene, total	ND	ug/L	2.5	1.4	5		09/13/13 22:05	VMS 2925	
Dichlorotrifluoroethane (F123)	ND	ug/L	2.5	0.70	5		09/13/13 22:05	VMS 2925	
Ethylbenzene	ND	ug/L	2.5	1.3	5		09/13/13 22:05	VMS 2925	
Methyl tert-butyl ether (MTBE)	ND	ug/L	2.5	0.75	5		09/13/13 22:05	VMS 2925	
Methylene chloride	ND	ug/L	3.0	1.5	5		09/13/13 22:05	VMS 2925	
1,1,2,2-Tetrachloroethane	ND	ug/L	2.5	1.0	5		09/13/13 22:05	VMS 2925	
Tetrachloroethene (PCE)	ND	ug/L	2.5	0.95	5		09/13/13 22:05	VMS 2925	
Toluene	2.6	ug/L	2.5	0.95	5		09/13/13 22:05	VMS 2925	
1,1,2-Trichloroethane	ND	ug/L	2.5	0.80	5		09/13/13 22:05	VMS 2925	
1,1,1-Trichloroethane (TCA)	ND	ug/L	2.5	0.95	5		09/13/13 22:05	VMS 2925	



ANALYTICAL RESULTS

Lab Order: N090461
 Project ID SEMI-ANNUAL

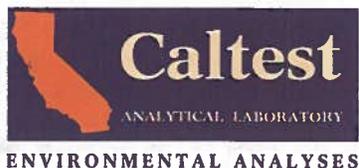
Lab ID: N090461007 Date Collected: 9/11/2013 12:50 Matrix: Water
Sample ID: INF-002 Date Received: 9/11/2013 15:06

Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Trichloroethene (TCE)	ND ug/L	2.5	1.0	5		09/13/13 22:05	VMS 2925	
Trichlorofluoromethane (F-11)	ND ug/L	2.5	1.4	5		09/13/13 22:05	VMS 2925	
Trichlorotrifluoroethane (F113)	ND ug/L	2.5	0.55	5		09/13/13 22:05	VMS 2925	
Vinyl chloride	ND ug/L	2.5	1.2	5		09/13/13 22:05	VMS 2925	
Xylenes, total	ND ug/L	2.5	1.3	5		09/13/13 22:05	VMS 2925	
4-Bromofluorobenzene (SS)	94 %	85-115		5		09/13/13 22:05	VMS 2925	
Dibromofluoromethane (SS)	106 %	85-115		5		09/13/13 22:05	VMS 2925	
1,2-Dichloroethane-d4 (SS)	99 %	75-125		5		09/13/13 22:05	VMS 2925	
Toluene-d8 (SS)	111 %	90-121		5		09/13/13 22:05	VMS 2925	

Lab ID: N090461008 Date Collected: 9/11/2013 13:16 Matrix: Water
Sample ID: EFF-002 Date Received: 9/11/2013 15:06

Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
Volatile Organic Analysis		Analytical Method: EPA 624			Analyzed by: AN			
Acrolein	ND ug/L	5.0	1.7	1		09/13/13 18:40	VMS 2925	2
Acrylonitrile	ND ug/L	2.0	1.0	1		09/13/13 18:40	VMS 2925	
Benzene	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
Bromodichloromethane	1.2 ug/L	0.5	0.16	1		09/13/13 18:40	VMS 2925	
Bromoform	ND ug/L	0.5	0.20	1		09/13/13 18:40	VMS 2925	
Bromomethane (Methyl Bromide)	ND ug/L	0.5	0.17	1		09/13/13 18:40	VMS 2925	
Carbon tetrachloride	ND ug/L	0.5	0.16	1		09/13/13 18:40	VMS 2925	
Chlorobenzene	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
Chloroethane (Ethyl Chloride)	ND ug/L	0.5	0.38	1		09/13/13 18:40	VMS 2925	
2-Chloroethyl vinyl ether	ND ug/L	1.0	0.28	1		09/13/13 18:40	VMS 2925	
Chloroform	2.6 ug/L	0.5	0.19	1		09/13/13 18:40	VMS 2925	
Chloromethane(Methyl Chloride)	ND ug/L	0.5	0.23	1		09/13/13 18:40	VMS 2925	
Dibromochloromethane	0.4 ug/L	0.5	0.17	1		09/13/13 18:40	VMS 2925	
1,2-Dichlorobenzene	ND ug/L	0.5	0.27	1		09/13/13 18:40	VMS 2925	
1,3-Dichlorobenzene	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
1,4-Dichlorobenzene	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
Dichlorodifluoromethane (F-12)	ND ug/L	0.5	0.30	1		09/13/13 18:40	VMS 2925	
1,1-Dichloroethane	ND ug/L	0.5	0.19	1		09/13/13 18:40	VMS 2925	





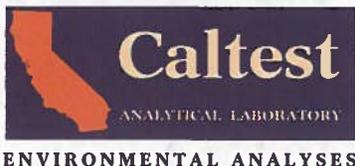
ANALYTICAL RESULTS

Lab Order: N090461

Project ID SEMI-ANNUAL

Lab ID: N090461008 Date Collected: 9/11/2013 13:16 Matrix: Water
 Sample ID: EFF-002 Date Received: 9/11/2013 15:06

Parameters	Result Units	R. L.	MDL	DF Prepared	Batch	Analyzed	Batch	Qual
1,2-Dichloroethane (EDC)	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
1,1-Dichloroethene	ND ug/L	0.5	0.21	1		09/13/13 18:40	VMS 2925	
cis-1,2-Dichloroethene	ND ug/L	0.5	0.20	1		09/13/13 18:40	VMS 2925	
trans-1,2-Dichloroethene	ND ug/L	0.5	0.22	1		09/13/13 18:40	VMS 2925	
1,2-Dichloropropane	ND ug/L	0.5	0.18	1		09/13/13 18:40	VMS 2925	
cis-1,3-Dichloropropene	ND ug/L	0.5	0.16	1		09/13/13 18:40	VMS 2925	
trans-1,3-Dichloropropene	ND ug/L	0.5	0.16	1		09/13/13 18:40	VMS 2925	
1,3-Dichloropropene, total	ND ug/L	0.5	0.29	1		09/13/13 18:40	VMS 2925	
Dichlorotrifluoroethane (F123)	ND ug/L	0.5	0.14	1		09/13/13 18:40	VMS 2925	
Ethylbenzene	ND ug/L	0.5	0.26	1		09/13/13 18:40	VMS 2925	
Methyl tert-butyl ether (MTBE)	ND ug/L	0.5	0.15	1		09/13/13 18:40	VMS 2925	
Methylene chloride	10.49 ug/L	0.5	0.30	1		09/13/13 18:40	VMS 2925	
1,1,2,2-Tetrachloroethane	ND ug/L	0.5	0.20	1		09/13/13 18:40	VMS 2925	
Tetrachloroethene (PCE)	ND ug/L	0.5	0.19	1		09/13/13 18:40	VMS 2925	
Toluene	0.9 ug/L	0.5	0.19	1		09/13/13 18:40	VMS 2925	
1,1,2-Trichloroethane	ND ug/L	0.5	0.16	1		09/13/13 18:40	VMS 2925	
1,1,1-Trichloroethane (TCA)	ND ug/L	0.5	0.19	1		09/13/13 18:40	VMS 2925	
Trichloroethene (TCE)	ND ug/L	0.5	0.20	1		09/13/13 18:40	VMS 2925	
Trichlorofluoromethane (F-11)	ND ug/L	0.5	0.29	1		09/13/13 18:40	VMS 2925	
Trichlorotrifluoroethane (F113)	ND ug/L	1.0	0.11	1		09/13/13 18:40	VMS 2925	
Vinyl chloride	ND ug/L	0.5	0.25	1		09/13/13 18:40	VMS 2925	
Xylenes, total	ND ug/L	0.5	0.26	1		09/13/13 18:40	VMS 2925	
4-Bromofluorobenzene (SS)	93 %	85-115		1		09/13/13 18:40	VMS 2925	
Dibromofluoromethane (SS)	109 %	85-115		1		09/13/13 18:40	VMS 2925	
1,2-Dichloroethane-d4 (SS)	104 %	75-125		1		09/13/13 18:40	VMS 2925	
Toluene-d8 (SS)	108 %	90-121		1		09/13/13 18:40	VMS 2925	



QUALITY CONTROL DATA

Lab Order: N090461

Project ID: SEMI-ANNUAL

Analysis Description: Mercury Analysis, Trace Level	QC Batch: MPR/12193
Analysis Method: EPA 1631E	QC Batch Method: EPA 1631E

METHOD BLANK: 540643

Parameter	Blank Result	Reporting Limit	MDL	Units	Qualifiers
Mercury	ND	0.0005	0.0002	ug/L	

LABORATORY CONTROL SAMPLE: 540644

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	0.02	0.02	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 540648 540649

Parameter	Units	N090480005 Result	Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limit	RPD	Max RPD	Qualifiers
Mercury	ug/L	0.0005	0.02	0.02	0.021	97	101	80-120	4.4	24	

Analysis Description: Mercury Analysis by FIMS, Low Level	QC Batch: MPR/12198
Analysis Method: EPA 245.1, Low Level	QC Batch Method: EPA 245.1

METHOD BLANK: 540832

Parameter	Blank Result	Reporting Limit	MDL	Units	Qualifiers
Mercury	ND	0.050	0.0080	ug/L	

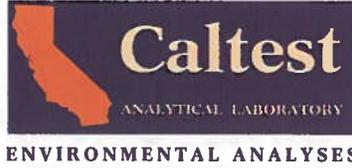
LABORATORY CONTROL SAMPLE: 540833

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	1	1	104	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 540835 540836

Parameter	Units	N090394001 Result	Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limit	RPD	Max RPD	Qualifiers
Mercury	ug/L	0	1	1	1.1	104	108	80-120	3.1	20	





QUALITY CONTROL DATA

Lab Order: N090461

Project ID: SEMI-ANNUAL

Analysis Description: Mercury Analysis by FIMS, Low Level	QC Batch: MPR/12198
Analysis Method: EPA 245.1, Low Level	QC Batch Method: EPA 245.1

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 540837 540838

Parameter	Units	N090506001 Result	Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limit	RPD	Max RPD	Qualifiers
Mercury	ug/L	0	1	1	1	103	101	80-120	1.5	20	

Analysis Description: Metals by ICPMS Collision Mode, Total	QC Batch: MPR/12202
Analysis Method: EPA 200.8	QC Batch Method: EPA 200.8

METHOD BLANK: 541345

Parameter	Blank Result	Reporting Limit	MDL	Units	Qualifiers
Selenium (reaction cell)	ND	1.0	0.06	ug/L	

LABORATORY CONTROL SAMPLE: 541346

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Selenium (reaction cell)	ug/L	20	20	98	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 541348 541349

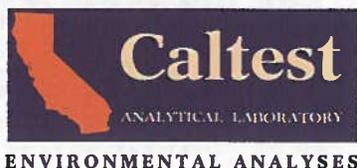
Parameter	Units	N090422003 Result	Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limit	RPD	Max RPD	Qualifiers
Selenium (reaction cell)	ug/L	0.49	20	20	20	96	97	70-130	0.9	20	

Analysis Description: Volatile Organic Analysis	QC Batch: VMS/2925
Analysis Method: EPA 624	QC Batch Method: EPA 624

METHOD BLANK: 540076

Parameter	Blank Result	Reporting Limit	MDL	Units	Qualifiers
Acrolein	ND	5.0	1.7	ug/L	
Acrylonitrile	ND	2.0	1.0	ug/L	
Benzene	ND	0.5	0.2	ug/L	
Bromodichloromethane	ND	0.5	0.2	ug/L	
Bromoform	ND	0.5	0.2	ug/L	
Bromomethane (Methyl Bromide)	ND	0.5	0.2	ug/L	





QUALITY CONTROL DATA

Lab Order: N090461

Project ID: SEMI-ANNUAL

Analysis Description: Volatile Organic Analysis	QC Batch: VMS/2925
Analysis Method: EPA 624	QC Batch Method: EPA 624

Parameter	Blank Result	Reporting Limit	MDL	Units	Qualifiers
Carbon tetrachloride	ND	0.5	0.2	ug/L	
Chlorobenzene	ND	0.5	0.2	ug/L	
Chloroethane (Ethyl Chloride)	ND	0.5	0.4	ug/L	
2-Chloroethyl vinyl ether	ND	1.0	0.3	ug/L	
Chloroform	ND	0.5	0.2	ug/L	
Chloromethane(Methyl Chloride)	ND	0.5	0.2	ug/L	
Dibromochloromethane	ND	0.5	0.2	ug/L	
1,2-Dichlorobenzene	ND	0.5	0.3	ug/L	
1,3-Dichlorobenzene	ND	0.5	0.2	ug/L	
1,4-Dichlorobenzene	ND	0.5	0.2	ug/L	
Dichlorodifluoromethane (F-12)	ND	0.5	0.3	ug/L	
1,1-Dichloroethane	ND	0.5	0.2	ug/L	
1,2-Dichloroethane (EDC)	ND	0.5	0.2	ug/L	
1,1-Dichloroethene	ND	0.5	0.2	ug/L	
cis-1,2-Dichloroethene	ND	0.5	0.2	ug/L	
trans-1,2-Dichloroethene	ND	0.5	0.2	ug/L	
1,2-Dichloropropane	ND	0.5	0.2	ug/L	
cis-1,3-Dichloropropene	ND	0.5	0.2	ug/L	
trans-1,3-Dichloropropene	ND	0.5	0.2	ug/L	
1,3-Dichloropropene, total	ND	0.5	0.3	ug/L	
Dichlorotrifluoroethane (F123)	ND	0.5	0.1	ug/L	
Ethylbenzene	ND	0.5	0.3	ug/L	
Methyl tert-butyl ether (MTBE)	ND	0.5	0.2	ug/L	
Methylene chloride	ND	0.5	0.3	ug/L	
1,1,2,2-Tetrachloroethane	ND	0.5	0.2	ug/L	
Tetrachloroethene (PCE)	ND	0.5	0.2	ug/L	
Toluene	ND	0.5	0.2	ug/L	
1,1,2-Trichloroethane	ND	0.5	0.2	ug/L	
1,1,1-Trichloroethane (TCA)	ND	0.5	0.2	ug/L	
Trichloroethene (TCE)	ND	0.5	0.2	ug/L	
Trichlorofluoromethane (F-11)	ND	0.5	0.3	ug/L	
Trichlorotrifluoroethane (F113)	ND	1.0	0.1	ug/L	
Vinyl chloride	ND	0.5	0.2	ug/L	
Xylenes, total	ND	0.5	0.3	ug/L	
4-Bromofluorobenzene (SS)	94	85-115		%	
Dibromofluoromethane (SS)	106	85-115		%	
1,2-Dichlorobenzene-d4 (SS)	91	80-120		%	
1,2-Dichloroethane-d4 (SS)	101	75-125		%	
Toluene-d8 (SS)	106	90-121		%	



ENVIRONMENTAL ANALYSES

QUALITY CONTROL DATA

Lab Order: N090461

Project ID: SEMI-ANNUAL

Analysis Description: Volatile Organic Analysis

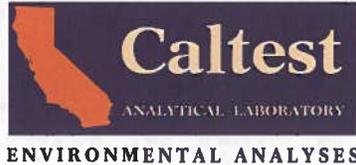
QC Batch: VMS/2925

Analysis Method: EPA 624

QC Batch Method: EPA 624

LABORATORY CONTROL SAMPLE: 540077

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Acrolein	ug/L	80	87	108	1-199	
Acrylonitrile	ug/L	80	100	126	76-112	3,4
Benzene	ug/L	20	21	105	37-151	
Bromodichloromethane	ug/L	20	22	112	35-155	
Bromoform	ug/L	20	23	117	45-169	
Bromomethane (Methyl Bromide)	ug/L	20	25	123	10-242	
Carbon tetrachloride	ug/L	20	21	107	70-140	
Chlorobenzene	ug/L	20	18	91	37-160	
Chloroethane (Ethyl Chloride)	ug/L	20	20	101	14-230	
2-Chloroethyl vinyl ether	ug/L	40	46	114	1-305	
Chloroform	ug/L	20	21	105	51-138	
Chloromethane(Methyl Chloride)	ug/L	20	23	114	10-273	
Dibromochloromethane	ug/L	20	21	106	53-149	
1,2-Dichlorobenzene	ug/L	20	19	96	18-190	
1,3-Dichlorobenzene	ug/L	20	19	96	59-156	
1,4-Dichlorobenzene	ug/L	20	19	96	18-190	
1,1-Dichloroethane	ug/L	20	21	105	59-155	
1,1-Dichloroethene	ug/L	20	20	102	10-234	
trans-1,2-Dichloroethene	ug/L	20	20	102	54-156	
1,2-Dichloropropane	ug/L	20	21	106	10-210	
cis-1,3-Dichloropropene	ug/L	20	22	109	10-227	
trans-1,3-Dichloropropene	ug/L	20	20	98	17-183	
Ethylbenzene	ug/L	20	19	94	37-162	
Methyl tert-butyl ether (MTBE)	ug/L	20	21	103	73-123	
Methylene chloride	ug/L	20	21	104	10-221	
1,1,2,2-Tetrachloroethane	ug/L	20	20	102	46-157	
Tetrachloroethene (PCE)	ug/L	20	20	98	64-148	
Toluene	ug/L	20	19	95	47-150	
1,1,2-Trichloroethane	ug/L	20	20	100	52-150	
1,1,1-Trichloroethane (TCA)	ug/L	20	21	104	52-162	
Trichloroethene (TCE)	ug/L	20	20	102	71-157	
Trichlorofluoromethane (F-11)	ug/L	20	21	103	17-181	
Vinyl chloride	ug/L	20	20	100	10-251	
4-Bromofluorobenzene (SS)	%			100	85-115	
Dibromofluoromethane (SS)	%			105	85-115	
1,2-Dichlorobenzene-d4 (SS)	%			106	80-120	
1,2-Dichloroethane-d4 (SS)	%			103	75-125	
Toluene-d8 (SS)	%			106	90-121	

**QUALITY CONTROL DATA QUALIFIERS**

Lab Order: N090461

Project ID: SEMI-ANNUAL

QUALITY CONTROL PARAMETER QUALIFIERS

Results Qualifiers: Report fields may contain codes and non-numeric data correlating to one or more of the following definitions:

NS - means not spiked and will not have recoveries reported for Analyte Spike Amounts

QC Codes Keys: These descriptors are used to help identify the specific QC samples and clarify the report.

MB - Method Blank

Method Blanks are reported to the same Method Detection Limits (MDLs) or Reporting Limits (RLs) as the analytical samples in the corresponding QC batch.

LCS/LCSD - Laboratory Control Spike / Laboratory Control Spike Duplicate

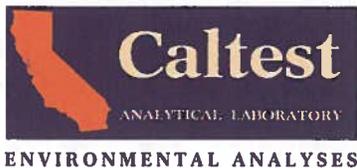
DUP - Duplicate of Original Sample Matrix

MS/MSD - Matrix Spike / Matrix Spike Duplicate

RPD - Relative Percent Difference

%Recovery - Spike Recovery stated as a percentage

- 3 Spike recovery for this compound was high, outside Caltest acceptance criteria. A sample result of 'ND' for this compound should be considered valid, otherwise any other value reported should be considered estimated.
- 4 The LCS passes, it does not exceed NELAC's criteria of allowable compound failures.



QUALITY CONTROL DATA CROSS REFERENCE TABLE

Lab Order: N090461

Project ID: SEMI-ANNUAL

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
N090461004	EFF-002	EPA 1631E	MPR/12193	EPA 1631E	MHG/4396
N090461003	INF-002	EPA 245.1	MPR/12198	EPA 245.1, Low Level	MHG/4398
N090461001	INF-002	EPA 200.8	MPR/12202	EPA 200.8	MMS/6948
N090461002	EFF-002	EPA 200.8	MPR/12202	EPA 200.8	MMS/6948
N090461007	INF-002	EPA 624	VMS/2925		
N090461008	EFF-002	EPA 624	VMS/2925		





Caltest
ANALYTICAL LABORATORY

1885 N. KELLY ROAD • NAPA, CA 94558 • (707) 258-4000 • Fax (707) 226-1001 • www.caltestlabs.com

LAB ORDER #

W090461

PROJECT # / PROJECT NAME

Semi Annual

REPEAT/ATTN:

Jean McMahon

ANALYSES REQUESTED

TURN-AROUND TIME

STANDARD

RUSH

CLIENT: Veolia Water
ADDRESS: 601 Canal Blvd. CITY: Richmond STATE: CA ZIP: 94804
BILLING ADDRESS:

PHONE #

576-412-2001

FAX PHONE:

SAMPLER (PRINT & SIGN NAME):

ops; JS. & VL

DUE DATE:

REMARKS

*Self +
Hgt + ultra clean
PCB's - 1668C
Dioxin TEQ (16/13)*

*NON NEGOTIABLE
D09/13/13*

CALTEST #	DATE SAMPLED	TIME SAMPLED	MATRIX	CONTAINER AMOUNT/TYP	PRESERVATIVE	SAMPLE IDENTIFICATION SITE	CLIENT LAB #	COMP. OF GRAB	REMARKS
	9/10-11/13	0733	W	1 PT	HNO3	INF-002		C	
	↓	0743	ML	1 PE	↓	EFF-002		C	
	9/11/13	1250	W	1 PT	HNO3	INF-002		G	
	9/11/13	1316	ML	1 OTC	HCl	EFF-002		G	
	↓	1325		1 OTC	↓	EFF-001		G	
	↓			1 OTC	↓	Field Blank		G	
	9/11/13		ML	2 AL	<6°C	EFF-001		G	
	↓			2 AL	↓	EFF-001		G	

By submittal of sample(s), client agrees to abide by the Terms and Conditions set forth on the reverse of this document.

RELINQUISHED BY

[Signature]

DATE/TIME

9/11/13 1413

RECEIVED BY

[Signature]

RELINQUISHED BY

9/11/13 1506 *[Signature]*

RECEIVED BY

FOR LAB USE ONLY

Samples: WC _____ MICRO _____ BIO _____ MET _____ SV _____ VOA _____ TEMP: 29 °C SEALED: Y ___ / N ___ INTACT: Y ___ / N ___

BD: BIC _____ WC _____ MET _____

CC: AA _____ SV _____ VOA _____

SIL: HP _____ PT _____ OT _____ VOA _____

W/HNO _____ H₂SO₄ _____ NaOH _____

PL: HNO _____ H₂SO₄ _____ NaOH _____ HCl _____

COMMENTS: 10

MATRIX: W = Aqueous Nondrinking Water, Digested Metals; ML = Low R.L.s.; Aqueous Nondrinking Water, Digested Metals; DW = Drinking Water; SL = Soil, Sludge, Solid; FP = Free Product

CONTAINER TYPES: AL = Amber Liter; AHL = 500 ml Amber; PT = Pint (Plastic); OT = Quart (Plastic); HG = Half Gallon (Plastic); SJ = Soil Jar; B4 = 4 oz. BACT; BT = Brass Tube; VOA = 40 mL VOA; OTC = Other Type Container



1885 N. KELLY ROAD • NAPA, CA 94558 • (707) 258-4000 • Fax (707) 226-1001 • www.caltestlabs.com

SAMPLE CHAIN OF CUSTODY

PROJECT # / PROJECT NAME

REPORT ATTN: Jean McMahon

STATE: CA ZIP: 94804

ANALYSES REQUESTED

TURN-AROUND TIME

- STANDARD
- RUSH

PAGE 2 OF 2

P.O. #

LAB ORDER #:

W090461

CLIENT: Veolia Water
ADDRESS: 601 Canal Blvd, CITY: Richmond
BILLING ADDRESS:

PHONE #:

FAX PHONE:

SAMPLER (PRINT & SIGN NAME): TS & VL

DUE DATE:

CALTEST #	DATE SAMPLED	TIME SAMPLED	MATRIX	CONTAINER AMOUNT/TYPE	PRESERVATIVE	SAMPLE IDENTIFICATION SITE	CLIENT LAB #	COMP. or GRAB	REMARKS
	9/11/13	1250 W	W	2 VOA	26°C PH 4-5.0	INF-002		G	VOCs VOCs VOCs
	↓	↓	↓	2 VOA	HCl	↓		G	PH 4-5
	9/11/13	1314 ML	ML	2 VOA	26°C PH 4-5.0	EFF-002		G	PH 4-5
	↓	↓	↓	2 VOA	HCl	↓		G	
	↓	↓	↓	2 VOA	HCl	↓		G	

By submission of sample(s), client agrees to abide by the Terms and Conditions set forth on the reverse of this document.

RELINQUISHED BY: <u>J. Johnson</u>	DATE/TIME: <u>9/11/13 1413</u>	RECEIVED BY: <u>[Signature]</u>	DATE/TIME: <u>[Signature]</u>
Samples: WC _____ MICRO _____ BIO _____ MET _____ SV _____ VOA _____	BD: BIO _____ WC _____ MET _____	CC: AA _____ SV _____ VOA _____	SIL: HP _____ PT _____ QT _____ VOA _____
WHNO _____ H ₂ SO ₄ _____ NaOH _____	PIL: HNO _____ H ₂ SO ₄ _____ NaOH _____ HCl _____	COMMENTS: <u>6X2</u>	
TEMP: <u>09</u> °C	SEALED: Y ___ / N ___	INTACT: Y ___ / N ___	

MATRIX: W = Aqueous Nondrinking Water, Digested Metals; ML = Low R.L.s. Aqueous Nondrinking Water, Digested Metals; DW = Drinking Water, SL = Soil, Sludge, Solid; FP = Free Product

CONTAINER TYPES: AL = Amber Liter; AHL = 500 ml Amber; PT = Pint (Plastic); QT = Quart (Plastic); HG = Half Gallon (Plastic); SJ = Soil Jar; B4 = 4 oz. BACT; BT = Brass Tube; VOA = 40 mL VOA; OTC = Other Type Container

E-3 Transport Sludge Results



THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica Irvine
17461 Derian Ave
Suite 100
Irvine, CA 92614-5817
Tel: (949)261-1022

TestAmerica Job ID: 440-57211-1
Client Project/Site: Semi-Annual Sludge

For:
Veolia Water N. America Operating Srvs
601 Canal Blvd.
Richmond, California 94804

Attn: Jean McMahon

*Authorized for release by:
9/30/2013 4:45:58 PM*

Janice Hsu, Project Manager I
(949)261-1022
janice.hsu@testamericainc.com

The test results in this report meet all 2003 NELAP and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.





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Sample Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
440-57211-1	BIO-002	Water	09/15/13 17:30	09/17/13 10:35

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13

Case Narrative

Client: Veolia Water N. America Operating Svcs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Job ID: 440-57211-1

Laboratory: TestAmerica Irvine

Narrative

Job Narrative
440-57211-1

Comments

No additional comments.

Receipt

The sample was received on 9/17/2013 10:35 AM; the sample arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 2.1° C.

GC/MS VOA

Method(s) 8260B: The preservative used in the sample containers provided is not compatible with the analytes requested. The following sample(s) was received preserved with hydrochloric acid: (440-56827-13 MS), (440-56827-13 MSD). The requested target analyte list contains 2-chloroethylvinyl ether, acrolein, and/or acrylonitrile, which are acid-labile compounds that degrade in an acidic medium.

Method(s) 8260B: The following sample submitted for volatiles analysis was received with insufficient preservation (pH >2): BIO-002 (440-57211-1). pH = 6

No other analytical or quality issues were noted.

GC/MS Semi VOA

Method(s) 8270C: The following sample(s) required a dilution due to the nature of the sample matrix: BIO-002 (440-57211-1). Because of this dilution, the surrogate spike concentration in the sample was reduced to a level where the recovery calculation does not provide useful information.

Method(s) 8270C: The following sample(s) was diluted due to the abundance of non-target analytes: BIO-002 (440-57211-1). Elevated reporting limits (RLs) are provided.

Method(s) 8270C: The %Recovery and RPD of the laboratory control sample (LCS) and laboratory control standard duplicate (LCSD) for preparation batch 131885 recovered outside control limits for a large number of compounds. Affected sample could not be reextracted within sample hold time.

Method(s) 8270C: The laboratory control sample duplicate (LCSD) for batch 131885 recovered outside control limits low for the following analytes: 3,3-Dichlorobenzidine. Low recoveries are possibly due to less than optimal extraction conditions such as fluctuations in heating mantle temp, condenser water temp, ambient light, angle of apparatus, spike solvent, final volume measurements, etc. Affected samples could not be reextracted within hold time.

Method(s) 8270C: The laboratory control sample (LCS) and / or the laboratory control sample duplicate (LCSD) for batch 131885 recovered outside control limits for many analytes. Low recoveries are possibly due to less than optimal extraction conditions such as fluctuations in heating mantle temp, condenser water temp, ambient light, angle of apparatus, spike solvent, final volume measurements, etc. Affected sample could not be reextracted within sample hold time.

No other analytical or quality issues were noted.

Metals

Method(s) 6020: The matrix spike / matrix spike duplicate (MS/MSD) percent recoveries for selenium for batch 132772 were outside control limits. This is attributed to matrix interferences.

Method(s) 7470A: The matrix spike / matrix spike duplicate (MS/MSD) recoveries for batch 131926 were outside control limits for Mercury. The associated laboratory control sample (LCS) recovery met acceptance criteria.

No other analytical or quality issues were noted.

General Chemistry

Method(s) SM 4500 CN E: The reference method SM 4500 CN E requires samples to be preserved to a pH of >12. The following sample

Case Narrative

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Job ID: 440-57211-1 (Continued)

Laboratory: TestAmerica Irvine (Continued)

was received with insufficient preservation at a pH of 7: BIO-002 (440-57211-1). The sample was preserved to the appropriate pH in the laboratory.

No other analytical or quality issues were noted.

Organic Prep

No analytical or quality issues were noted.

VOA Prep

No analytical or quality issues were noted.



Client Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Client Sample ID: BIO-002

Lab Sample ID: 440-57211-1

Date Collected: 09/15/13 17:30

Matrix: Water

Date Received: 09/17/13 10:35

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,1,1-Trichloroethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Acrolein	ND		500	25	ug/L			09/20/13 00:51	10
1,1,2,2-Tetrachloroethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Acrylonitrile	ND		500	10	ug/L			09/20/13 00:51	10
1,1,2-Trichloroethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
2-Chloroethyl vinyl ether	ND		50	10	ug/L			09/20/13 00:51	10
1,1-Dichloroethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
1,1-Dichloroethene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
1,2-Dichlorobenzene	ND		2.0	0.25	ug/L			09/25/13 02:48	1
1,2-Dichloroethane	ND		0.50	0.25	ug/L			09/25/13 02:48	1
1,2-Dichloropropane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
1,3-Dichlorobenzene	ND		2.0	0.25	ug/L			09/25/13 02:48	1
1,4-Dichlorobenzene	ND		2.0	0.25	ug/L			09/25/13 02:48	1
Benzene	ND		0.50	0.25	ug/L			09/25/13 02:48	1
Bromodichloromethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Bromoform	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Bromomethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Carbon tetrachloride	ND		0.50	0.25	ug/L			09/25/13 02:48	1
Chlorobenzene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Chloroethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Chloroform	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Chloromethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
cis-1,2-Dichloroethene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
cis-1,3-Dichloropropene	ND		0.50	0.25	ug/L			09/25/13 02:48	1
Dibromochloromethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Ethylbenzene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
m,p-Xylene	ND		1.0	0.50	ug/L			09/25/13 02:48	1
Methylene Chloride	ND		2.0	0.50	ug/L			09/25/13 02:48	1
Tetrachloroethene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Toluene	2.3		1.0	0.25	ug/L			09/25/13 02:48	1
trans-1,2-Dichloroethene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
trans-1,3-Dichloropropene	ND		0.50	0.25	ug/L			09/25/13 02:48	1
Trichloroethene	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Trichlorofluoromethane	ND		1.0	0.25	ug/L			09/25/13 02:48	1
Vinyl chloride	ND		0.50	0.25	ug/L			09/25/13 02:48	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Toluene-d8 (Surr)	101		80 - 120		09/20/13 00:51	10
4-Bromofluorobenzene (Surr)	99		80 - 120		09/20/13 00:51	10
Dibromofluoromethane (Surr)	104		80 - 120		09/20/13 00:51	10
4-Bromofluorobenzene (Surr)	101		80 - 120		09/25/13 02:48	1
Dibromofluoromethane (Surr)	114		80 - 120		09/25/13 02:48	1
Toluene-d8 (Surr)	98		80 - 120		09/25/13 02:48	1

Method: 8270C - Semivolatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Acenaphthene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Acenaphthylene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Aniline	ND		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Anthracene	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10

TestAmerica Irvine

Client Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Client Sample ID: BIO-002

Lab Sample ID: 440-57211-1

Date Collected: 09/15/13 17:30

Matrix: Water

Date Received: 09/17/13 10:35

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzidine	ND		210	110	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzo[a]anthracene	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzo[a]pyrene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzo[b]fluoranthene	ND	*	110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzo[g,h,i]perylene	ND		110	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzoic acid	ND		210	110	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzo[k]fluoranthene	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Benzyl alcohol	ND	*	210	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Bis(2-chloroethoxy)methane	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Bis(2-chloroethyl)ether	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
bis (2-chloroisopropyl) ether	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Bis(2-ethylhexyl) phthalate	52	J*	530	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Bromophenyl phenyl ether	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Butyl benzyl phthalate	ND	*	210	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Chloroaniline	ND		110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Chloro-3-methylphenol	ND		210	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
2-Chloronaphthalene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
2-Chlorophenol	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Chlorophenyl phenyl ether	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Chrysene	ND	*	110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Dibenz(a,h)anthracene	ND		210	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Dibenzofuran	ND	*	110	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
1,2-Dichlorobenzene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
1,3-Dichlorobenzene	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
1,4-Dichlorobenzene	ND		110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
3,3'-Dichlorobenzidine	ND	*	210	79	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4-Dichlorophenol	ND		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Diethyl phthalate	ND		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4-Dimethylphenol	ND		210	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Dimethyl phthalate	ND		110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Di-n-butyl phthalate	ND		210	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
4,6-Dinitro-2-methylphenol	ND		210	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4-Dinitrophenol	ND	*	210	85	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4-Dinitrotoluene	ND		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,6-Dinitrotoluene	ND		110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
Di-n-octyl phthalate	ND	*	210	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
1,2-Diphenylhydrazine(as Azobenzene)	ND		210	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
Fluoranthene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Fluorene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Hexachlorobenzene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Hexachlorobutadiene	ND	*	110	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
Hexachlorocyclopentadiene	ND	*	210	53	ug/L		09/18/13 12:55	09/24/13 21:04	10
Hexachloroethane	ND	*	110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Indeno[1,2,3-cd]pyrene	ND		210	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Isophorone	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
2-Methylnaphthalene	ND	*	110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
2-Methylphenol	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
3-Methylphenol + 4-Methylphenol	ND		110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
Naphthalene	ND	*	110	32	ug/L		09/18/13 12:55	09/24/13 21:04	10

TestAmerica Irvine



Client Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Client Sample ID: BIO-002

Lab Sample ID: 440-57211-1

Date Collected: 09/15/13 17:30

Matrix: Water

Date Received: 09/17/13 10:35

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
2-Nitroaniline	ND		210	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
3-Nitroaniline	ND		210	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Nitroaniline	ND		210	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
Nitrobenzene	ND		210	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
2-Nitrophenol	ND		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
4-Nitrophenol	ND		210	58	ug/L		09/18/13 12:55	09/24/13 21:04	10
N-Nitrosodimethylamine	ND		210	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
N-Nitrosodi-n-propylamine	ND *		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
N-Nitrosodiphenylamine	ND *		110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
Pentachlorophenol	ND *		210	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Phenanthrene	ND *		110	37	ug/L		09/18/13 12:55	09/24/13 21:04	10
Phenol	ND		110	21	ug/L		09/18/13 12:55	09/24/13 21:04	10
Pyrene	ND *		110	42	ug/L		09/18/13 12:55	09/24/13 21:04	10
1,2,4-Trichlorobenzene	ND *		110	26	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4,5-Trichlorophenol	ND		210	32	ug/L		09/18/13 12:55	09/24/13 21:04	10
2,4,6-Trichlorophenol	ND		210	48	ug/L		09/18/13 12:55	09/24/13 21:04	10
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl	17	X	50 - 120				09/18/13 12:55	09/24/13 21:04	10
2-Fluorophenol (Surr)	57		30 - 120				09/18/13 12:55	09/24/13 21:04	10
Nitrobenzene-d5 (Surr)	38	X	45 - 120				09/18/13 12:55	09/24/13 21:04	10
Phenol-d6 (Surr)	65		35 - 120				09/18/13 12:55	09/24/13 21:04	10
Terphenyl-d14 (Surr)	19		10 - 150				09/18/13 12:55	09/24/13 21:04	10
2,4,6-Tribromophenol (Surr)	69		40 - 120				09/18/13 12:55	09/24/13 21:04	10

Method: 6020 - Metals (ICP/MS) - Total Recoverable									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	49		25	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Cadmium	31		25	6.3	ug/L		09/23/13 10:35	09/23/13 22:01	5
Chromium	180		50	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Copper	2700		50	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Lead	220	B	25	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Nickel	210		50	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Selenium	20	J	50	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Silver	28		25	13	ug/L		09/23/13 10:35	09/23/13 22:01	5
Zinc	7300		500	130	ug/L		09/23/13 10:35	09/23/13 22:01	5

Method: 7470A - Mercury (CVAA)									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.0067		0.0010	0.00050	mg/L		09/18/13 14:47	09/18/13 19:15	1

General Chemistry									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Total	66		25	17	ug/L		09/25/13 13:38	09/25/13 18:44	1
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total Solids	12000		10	10	mg/L			09/20/13 08:18	1

TestAmerica Irvine

Method Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method	Method Description	Protocol	Laboratory
8260B	Volatile Organic Compounds (GC/MS)	SW846	TAL IRV
8270C	Semivolatile Organic Compounds (GC/MS)	SW846	TAL IRV
6020	Metals (ICP/MS)	SW846	TAL IRV
7470A	Mercury (CVAA)	SW846	TAL IRV
SM 2540B	Solids, Total	SM	TAL IRV
SM 4500 CN E	Cyanide, Total	SM	TAL IRV

Protocol References:

SM = "Standard Methods For The Examination Of Water And Wastewater",

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022



Lab Chronicle

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Client Sample ID: BIO-002

Lab Sample ID: 440-57211-1

Date Collected: 09/15/13 17:30

Matrix: Water

Date Received: 09/17/13 10:35

Prep Type	Batch Type	Batch Method	Run	DII Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		10	10 mL	10 mL	132248	09/20/13 00:51	WK	TAL IRV
Total/NA	Analysis	8260B		1	10 mL	10 mL	133195	09/25/13 02:48	AA	TAL IRV
Total/NA	Prep	3520C			945 mL	2 mL	131885	09/18/13 12:55	BB	TAL IRV
Total/NA	Analysis	8270C		10			133018	09/24/13 21:04	AI	TAL IRV
Total/NA	Prep	7470A			4 mL	20 mL	131926	09/18/13 14:47	DB	TAL IRV
Total/NA	Analysis	7470A		1			132115	09/18/13 19:15	DB	TAL IRV
Total Recoverable	Prep	3005A			10 mL	50 mL	132758	09/23/13 10:35	ND	TAL IRV
Total Recoverable	Analysis	6020		5			133012	09/23/13 22:01	NH	TAL IRV
Total/NA	Analysis	SM 2540B		1	100 mL	100 mL	132361	09/20/13 08:18	XL	TAL IRV
Total/NA	Prep	Distill/CN			50 mL	50 mL	133432	09/25/13 13:38	BS	TAL IRV
Total/NA	Analysis	SM 4500 CN E		1			133501	09/25/13 18:44	BS	TAL IRV

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022



QC Sample Results

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 440-132248/4
Matrix: Water
Analysis Batch: 132248

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Acrolein	ND		50	2.5	ug/L			09/19/13 20:20	1
Acrylonitrile	ND		50	1.0	ug/L			09/19/13 20:20	1
2-Chloroethyl vinyl ether	ND		5.0	1.0	ug/L			09/19/13 20:20	1

Surrogate	MB MB		Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
Toluene-d8 (Surr)	99		80 - 120		09/19/13 20:20	1
4-Bromofluorobenzene (Surr)	99		80 - 120		09/19/13 20:20	1
Dibromofluoromethane (Surr)	97		80 - 120		09/19/13 20:20	1

Lab Sample ID: LCS 440-132248/5
Matrix: Water
Analysis Batch: 132248

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits

Surrogate	LCS LCS		Limits
	%Recovery	Qualifier	
Toluene-d8 (Surr)	99		80 - 120
4-Bromofluorobenzene (Surr)	95		80 - 120
Dibromofluoromethane (Surr)	100		80 - 120

Lab Sample ID: 440-56827-C-13 MS
Matrix: Water
Analysis Batch: 132248

Client Sample ID: Matrix Spike
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits

Surrogate	MS MS		Limits
	%Recovery	Qualifier	
Toluene-d8 (Surr)	100		80 - 120
4-Bromofluorobenzene (Surr)	99		80 - 120
Dibromofluoromethane (Surr)	109		80 - 120

Lab Sample ID: 440-56827-C-13 MSD
Matrix: Water
Analysis Batch: 132248

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit

Surrogate	MSD MSD		Limits
	%Recovery	Qualifier	
Toluene-d8 (Surr)	100		80 - 120
4-Bromofluorobenzene (Surr)	97		80 - 120
Dibromofluoromethane (Surr)	107		80 - 120

TestAmerica Irvine

QC Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 440-133195/4
 Matrix: Water
 Analysis Batch: 133195

Client Sample ID: Method Blank
 Prep Type: Total/NA

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	DII Fac
	Result	Qualifier							
1,1,1-Trichloroethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,1,2,2-Tetrachloroethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,1,2-Trichloroethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,1-Dichloroethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,1-Dichloroethene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,2-Dichlorobenzene	ND		2.0	0.25	ug/L			09/24/13 20:18	1
1,2-Dichloroethane	ND		0.50	0.25	ug/L			09/24/13 20:18	1
1,2-Dichloropropane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
1,3-Dichlorobenzene	ND		2.0	0.25	ug/L			09/24/13 20:18	1
1,4-Dichlorobenzene	ND		2.0	0.25	ug/L			09/24/13 20:18	1
Benzene	ND		0.50	0.25	ug/L			09/24/13 20:18	1
Bromodichloromethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Bromoform	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Bromomethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Carbon tetrachloride	ND		0.50	0.25	ug/L			09/24/13 20:18	1
Chlorobenzene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Chloroethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Chloroform	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Chloromethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
cis-1,2-Dichloroethene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
cis-1,3-Dichloropropene	ND		0.50	0.25	ug/L			09/24/13 20:18	1
Dibromochloromethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Ethylbenzene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
m,p-Xylene	ND		1.0	0.50	ug/L			09/24/13 20:18	1
Methylene Chloride	ND		2.0	0.50	ug/L			09/24/13 20:18	1
Tetrachloroethene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Toluene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
trans-1,2-Dichloroethene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
trans-1,3-Dichloropropene	ND		0.50	0.25	ug/L			09/24/13 20:18	1
Trichloroethene	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Trichlorofluoromethane	ND		1.0	0.25	ug/L			09/24/13 20:18	1
Vinyl chloride	ND		0.50	0.25	ug/L			09/24/13 20:18	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	DII Fac
	%Recovery	Qualifier				
4-Bromofluorobenzene (Surr)	97		80 - 120		09/24/13 20:18	1
Dibromofluoromethane (Surr)	102		80 - 120		09/24/13 20:18	1
Toluene-d8 (Surr)	99		80 - 120		09/24/13 20:18	1

Lab Sample ID: LCS 440-133195/5
 Matrix: Water
 Analysis Batch: 133195

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA

Analyte	Spike Added	LCS	LCS	Unit	D	%Rec	%Rec
		Result	Qualifier				
1,1,1-Trichloroethane	25.0	29.8		ug/L		119	70 - 130
1,1,2,2-Tetrachloroethane	25.0	26.8		ug/L		107	63 - 130
1,1,2-Trichloroethane	25.0	24.0		ug/L		96	70 - 130
1,1-Dichloroethane	25.0	23.9		ug/L		96	64 - 130
1,1-Dichloroethene	25.0	26.7		ug/L		107	70 - 130

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QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 440-133195/5

Matrix: Water

Analysis Batch: 133195

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
1,2-Dichlorobenzene	25.0	24.4		ug/L		98	70 - 130
1,2-Dichloroethane	25.0	28.1		ug/L		112	57 - 138
1,2-Dichloropropane	25.0	22.9		ug/L		92	67 - 130
1,3-Dichlorobenzene	25.0	25.1		ug/L		101	70 - 130
1,4-Dichlorobenzene	25.0	24.8		ug/L		99	70 - 130
Benzene	25.0	23.9		ug/L		96	68 - 130
Bromodichloromethane	25.0	30.2		ug/L		121	70 - 132
Bromoform	25.0	32.9		ug/L		132	60 - 148
Bromomethane	25.0	30.4		ug/L		122	64 - 139
Carbon tetrachloride	25.0	31.6		ug/L		127	60 - 150
Chlorobenzene	25.0	24.5		ug/L		98	70 - 130
Chloroethane	25.0	29.3		ug/L		117	64 - 135
Chloroform	25.0	27.0		ug/L		108	70 - 130
Chloromethane	25.0	30.1		ug/L		121	47 - 140
cis-1,2-Dichloroethene	25.0	25.6		ug/L		102	70 - 133
cis-1,3-Dichloropropene	25.0	26.1		ug/L		104	70 - 133
Dibromochloromethane	25.0	27.5		ug/L		110	69 - 145
Ethylbenzene	25.0	25.3		ug/L		101	70 - 130
m,p-Xylene	50.0	48.5		ug/L		97	70 - 130
Methylene Chloride	25.0	22.9		ug/L		92	52 - 130
Tetrachloroethene	25.0	25.4		ug/L		101	70 - 130
Toluene	25.0	24.2		ug/L		97	70 - 130
trans-1,2-Dichloroethene	25.0	24.1		ug/L		97	70 - 130
trans-1,3-Dichloropropene	25.0	27.0		ug/L		108	70 - 132
Trichloroethene	25.0	25.3		ug/L		101	70 - 130
Trichlorofluoromethane	25.0	35.3		ug/L		141	60 - 150
Vinyl chloride	25.0	33.3		ug/L		133	59 - 133

Surrogate	LCS %Recovery	LCS Qualifier	Limits
4-Bromofluorobenzene (Surr)	95		80 - 120
Dibromofluoromethane (Surr)	104		80 - 120
Toluene-d8 (Surr)	101		80 - 120

Lab Sample ID: 440-57184-C-4 MS

Matrix: Water

Analysis Batch: 133195

Client Sample ID: Matrix Spike

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
1,1,1-Trichloroethane	ND		125	135		ug/L		108	70 - 130
1,1,2,2-Tetrachloroethane	ND		125	133		ug/L		106	63 - 130
1,1,2-Trichloroethane	ND		125	130		ug/L		104	70 - 130
1,1-Dichloroethane	ND		125	111		ug/L		88	65 - 130
1,1-Dichloroethene	ND		125	125		ug/L		100	70 - 130
1,2-Dichlorobenzene	ND		125	117		ug/L		94	70 - 130
1,2-Dichloroethane	4.2		125	143		ug/L		111	56 - 146
1,2-Dichloropropane	ND		125	110		ug/L		88	69 - 130
1,3-Dichlorobenzene	ND		125	119		ug/L		95	70 - 130
1,4-Dichlorobenzene	ND		125	119		ug/L		95	70 - 130

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QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

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Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: 440-57184-C-4 MS				Client Sample ID: Matrix Spike						
Matrix: Water				Prep Type: Total/NA						
Analysis Batch: 133195										
Analyte	Sample	Sample	Spike	MS	MS	Unit	D	%Rec	%Rec.	
	Result	Qualifier	Added	Result	Qualifier				Limits	Limit
Benzene	64		125	179		ug/L		92	66 - 130	
Bromodichloromethane	ND		125	146		ug/L		117	70 - 138	
Bromoform	ND		125	162		ug/L		130	59 - 150	
Bromomethane	ND		125	136		ug/L		108	62 - 131	
Carbon tetrachloride	ND		125	142		ug/L		114	60 - 150	
Chlorobenzene	ND		125	115		ug/L		92	70 - 130	
Chloroethane	ND		125	134		ug/L		107	68 - 130	
Chloroform	ND		125	125		ug/L		100	70 - 130	
Chloromethane	ND		125	141		ug/L		113	39 - 144	
cis-1,2-Dichloroethene	ND		125	120		ug/L		96	70 - 130	
cis-1,3-Dichloropropene	ND		125	130		ug/L		104	70 - 133	
Dibromochloromethane	ND		125	135		ug/L		108	70 - 148	
Ethylbenzene	210		125	320		ug/L		88	70 - 130	
m,p-Xylene	330		250	532		ug/L		83	70 - 133	
Methylene Chloride	ND		125	111		ug/L		89	52 - 130	
Tetrachloroethene	ND		125	117		ug/L		94	70 - 137	
Toluene	190		125	318		ug/L		101	70 - 130	
trans-1,2-Dichloroethene	ND		125	111		ug/L		89	70 - 130	
trans-1,3-Dichloropropene	ND		125	134		ug/L		107	70 - 138	
Trichloroethene	ND		125	117		ug/L		93	70 - 130	
Trichlorofluoromethane	ND		125	158		ug/L		126	60 - 150	
Vinyl chloride	ND		125	153		ug/L		122	50 - 137	
				MS	MS					
Surrogate	%Recovery		Qualifier	Limits						
4-Bromofluorobenzene (Surr)	97			80 - 120						
Dibromofluoromethane (Surr)	104			80 - 120						
Toluene-d8 (Surr)	100			80 - 120						

Lab Sample ID: 440-57184-C-4 MSD				Client Sample ID: Matrix Spike Duplicate							
Matrix: Water				Prep Type: Total/NA							
Analysis Batch: 133195											
Analyte	Sample	Sample	Spike	MSD	MSD	Unit	D	%Rec	%Rec.		RPD
	Result	Qualifier	Added	Result	Qualifier				Limits	RPD	Limit
1,1,1-Trichloroethane	ND		125	132		ug/L		106	70 - 130	2	20
1,1,2,2-Tetrachloroethane	ND		125	130		ug/L		104	63 - 130	2	30
1,1,2-Trichloroethane	ND		125	130		ug/L		104	70 - 130	0	25
1,1-Dichloroethane	ND		125	113		ug/L		90	65 - 130	2	20
1,1-Dichloroethene	ND		125	126		ug/L		101	70 - 130	1	20
1,2-Dichlorobenzene	ND		125	118		ug/L		94	70 - 130	1	20
1,2-Dichloroethane	4.2		125	145		ug/L		112	56 - 146	1	20
1,2-Dichloropropane	ND		125	114		ug/L		91	69 - 130	4	20
1,3-Dichlorobenzene	ND		125	120		ug/L		96	70 - 130	0	20
1,4-Dichlorobenzene	ND		125	120		ug/L		96	70 - 130	1	20
Benzene	64		125	177		ug/L		91	66 - 130	1	20
Bromodichloromethane	ND		125	145		ug/L		116	70 - 138	0	20
Bromoform	ND		125	161		ug/L		128	59 - 150	1	25
Bromomethane	ND		125	135		ug/L		108	62 - 131	0	25
Carbon tetrachloride	ND		125	136		ug/L		109	60 - 150	4	25

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QC Sample Results

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: 440-57184-C-4 MSD

Matrix: Water

Analysis Batch: 133195

Client Sample ID: Matrix Spike Duplicate

Prep Type: Total/NA

Analyte	Sample	Sample	Spike	MSD	MSD	Unit	D	%Rec	%Rec.	RPD	RPD
	Result	Qualifier	Added	Result	Qualifier				Limits		Limit
Chlorobenzene	ND		125	115		ug/L		92	70 - 130	0	20
Chloroethane	ND		125	134		ug/L		107	68 - 130	0	25
Chloroform	ND		125	127		ug/L		102	70 - 130	2	20
Chloromethane	ND		125	139		ug/L		111	39 - 144	1	25
cis-1,2-Dichloroethene	ND		125	126		ug/L		101	70 - 130	4	20
cis-1,3-Dichloropropene	ND		125	133		ug/L		106	70 - 133	2	20
Dibromochloromethane	ND		125	136		ug/L		109	70 - 148	1	25
Ethylbenzene	210		125	315		ug/L		83	70 - 130	2	20
m,p-Xylene	330		250	523		ug/L		79	70 - 133	2	25
Methylene Chloride	ND		125	114		ug/L		91	52 - 130	3	20
Tetrachloroethene	ND		125	115		ug/L		92	70 - 137	2	20
Toluene	190		125	311		ug/L		96	70 - 130	2	20
trans-1,2-Dichloroethene	ND		125	112		ug/L		90	70 - 130	1	20
trans-1,3-Dichloropropene	ND		125	136		ug/L		108	70 - 138	1	25
Trichloroethene	ND		125	114		ug/L		91	70 - 130	2	20
Trichlorofluoromethane	ND		125	152		ug/L		121	60 - 150	4	25
Vinyl chloride	ND		125	148		ug/L		119	50 - 137	3	30
		MSD	MSD								
Surrogate		%Recovery	Qualifier	Limits							
4-Bromofluorobenzene (Surr)		98		80 - 120							
Dibromofluoromethane (Surr)		106		80 - 120							
Toluene-d8 (Surr)		100		80 - 120							

Method: 8270C - Semivolatile Organic Compounds (GC/MS)

Lab Sample ID: MB 440-131885/1-A

Matrix: Water

Analysis Batch: 132816

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 131885

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	DII Fac
	Result	Qualifier							
Acenaphthene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Acenaphthylene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Aniline	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Anthracene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzidine	ND		20	10	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzo[a]anthracene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzo[a]pyrene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzo[b]fluoranthene	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzo[g,h,i]perylene	ND		10	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzoic acid	ND		20	10	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzo[k]fluoranthene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Benzyl alcohol	ND		20	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Bis(2-chloroethoxy)methane	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Bis(2-chloroethyl)ether	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
bis(2-chloroisopropyl) ether	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Bis(2-ethylhexyl) phthalate	ND		50	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
4-Bromophenyl phenyl ether	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Butyl benzyl phthalate	ND		20	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1

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QC Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 440-131885/1-A
 Matrix: Water
 Analysis Batch: 132816

Client Sample ID: Method Blank
 Prep Type: Total/NA
 Prep Batch: 131885

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	DII Fac
	Result	Qualifier							
4-Chloroaniline	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
4-Chloro-3-methylphenol	ND		20	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Chloronaphthalene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Chlorophenol	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
4-Chlorophenyl phenyl ether	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Chrysene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Dibenz(a,h)anthracene	ND		20	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Dibenzofuran	ND		10	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
1,2-Dichlorobenzene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
1,3-Dichlorobenzene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
1,4-Dichlorobenzene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
3,3'-Dichlorobenzidine	ND		20	7.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4-Dichlorophenol	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Diethyl phthalate	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4-Dimethylphenol	ND		20	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Dimethyl phthalate	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Di-n-butyl phthalate	ND		20	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
4,6-Dinitro-2-methylphenol	ND		20	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4-Dinitrophenol	ND		20	8.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4-Dinitrotoluene	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,6-Dinitrotoluene	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Di-n-octyl phthalate	ND		20	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
1,2-Diphenylhydrazine(as Azobenzene)	ND		20	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Fluoranthene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Fluorene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Hexachlorobenzene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Hexachlorobutadiene	ND		10	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Hexachlorocyclopentadiene	ND		20	5.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Hexachloroethane	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Indeno[1,2,3-cd]pyrene	ND		20	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Isophorone	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Methylnaphthalene	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Methylphenol	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
3-Methylphenol + 4-Methylphenol	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Naphthalene	ND		10	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Nitroaniline	ND		20	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
3-Nitroaniline	ND		20	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
4-Nitroaniline	ND		20	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Nitrobenzene	ND		20	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2-Nitrophenol	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
4-Nitrophenol	ND		20	5.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
N-Nitrosodimethylamine	ND		20	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
N-Nitrosodi-n-propylamine	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
N-Nitrosodiphenylamine	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
Pentachlorophenol	ND		20	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Phenanthrene	ND		10	3.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
Phenol	ND		10	2.0	ug/L		09/18/13 12:55	09/23/13 16:08	1

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QC Sample Results

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 440-131885/1-A

Matrix: Water

Analysis Batch: 132816

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 131885

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Pyrene	ND		10	4.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
1,2,4-Trichlorobenzene	ND		10	2.5	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4,5-Trichlorophenol	ND		20	3.0	ug/L		09/18/13 12:55	09/23/13 16:08	1
2,4,6-Trichlorophenol	ND		20	4.5	ug/L		09/18/13 12:55	09/23/13 16:08	1

Surrogate	MB MB		Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
2-Fluorobiphenyl	78		50 - 120	09/18/13 12:55	09/23/13 16:08	1
2-Fluorophenol (Surr)	49		30 - 120	09/18/13 12:55	09/23/13 16:08	1
Nitrobenzene-d5 (Surr)	71		45 - 120	09/18/13 12:55	09/23/13 16:08	1
Phenol-d6 (Surr)	54		35 - 120	09/18/13 12:55	09/23/13 16:08	1
Terphenyl-d14 (Surr)	76		10 - 150	09/18/13 12:55	09/23/13 16:08	1
2,4,6-Tribromophenol (Surr)	86		40 - 120	09/18/13 12:55	09/23/13 16:08	1

Lab Sample ID: LCS 440-131885/2-A

Matrix: Water

Analysis Batch: 133018

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 131885

Analyte	Spike Added	LCS LCS		Unit	D	%Rec	%Rec.	
		Result	Qualifier				Limits	
Acenaphthene	100	49.9	*	ug/L		50	60 - 120	
Acenaphthylene	100	51.0	*	ug/L		51	60 - 120	
Aniline	100	72.4		ug/L		72	35 - 120	
Anthracene	100	54.0	*	ug/L		54	65 - 120	
Benzidine	100	110		ug/L		110	30 - 160	
Benzo[a]anthracene	100	56.0	*	ug/L		56	65 - 120	
Benzo[a]pyrene	100	53.1	*	ug/L		53	55 - 130	
Benzo[b]fluoranthene	100	52.2	*	ug/L		52	55 - 125	
Benzo[g,h,i]perylene	100	56.4		ug/L		56	45 - 135	
Benzoic acid	100	71.4		ug/L		71	25 - 120	
Benzo[k]fluoranthene	100	50.2		ug/L		50	50 - 125	
Benzyl alcohol	100	55.0		ug/L		55	50 - 120	
Bis(2-chloroethoxy)methane	100	67.3		ug/L		67	55 - 120	
Bis(2-chloroethyl)ether	100	58.4		ug/L		58	50 - 120	
bis (2-chloroisopropyl) ether	100	56.3		ug/L		56	45 - 120	
Bis(2-ethylhexyl) phthalate	100	52.9		ug/L		53	44 - 124	
4-Bromophenyl phenyl ether	100	51.0	*	ug/L		51	60 - 120	
Butyl benzyl phthalate	100	60.1		ug/L		60	55 - 130	
4-Chloroaniline	100	71.2		ug/L		71	55 - 120	
4-Chloro-3-methylphenol	100	70.3		ug/L		70	60 - 120	
2-Chloronaphthalene	100	45.9	*	ug/L		46	60 - 120	
2-Chlorophenol	100	51.7		ug/L		52	45 - 120	
4-Chlorophenyl phenyl ether	100	50.8		ug/L		51	44 - 120	
Chrysene	100	52.7	*	ug/L		53	65 - 120	
Dibenz(a,h)anthracene	100	57.4		ug/L		57	50 - 135	
Dibenzofuran	100	50.2	*	ug/L		50	65 - 120	
1,2-Dichlorobenzene	100	41.4		ug/L		41	40 - 120	
1,3-Dichlorobenzene	100	38.8		ug/L		39	35 - 120	
1,4-Dichlorobenzene	100	39.5		ug/L		40	35 - 120	
3,3'-Dichlorobenzidine	100	31.7	*	ug/L		32	45 - 135	

TestAmerica Irvine

QC Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 440-131885/2-A
 Matrix: Water
 Analysis Batch: 133018

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA
 Prep Batch: 131885

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	Limits
2,4-Dichlorophenol	100	59.5		ug/L		59	55 - 120
Diethyl phthalate	100	79.1		ug/L		79	55 - 120
2,4-Dimethylphenol	100	60.7		ug/L		61	40 - 120
Dimethyl phthalate	100	77.1		ug/L		77	30 - 120
Di-n-butyl phthalate	100	66.2		ug/L		66	60 - 125
4,6-Dinitro-2-methylphenol	100	85.9		ug/L		86	45 - 120
2,4-Dinitrophenol	100	88.7		ug/L		89	40 - 120
2,4-Dinitrotoluene	100	73.6		ug/L		74	65 - 120
2,6-Dinitrotoluene	100	70.4		ug/L		70	65 - 120
Di-n-octyl phthalate	100	52.0	*	ug/L		52	65 - 135
1,2-Diphenylhydrazine(as Azobenzene)	100	63.5		ug/L		63	60 - 120
Fluoranthene	100	57.6	*	ug/L		58	60 - 120
Fluorene	100	53.0	*	ug/L		53	65 - 120
Hexachlorobenzene	100	51.4	*	ug/L		51	60 - 120
Hexachlorobutadiene	100	27.5	*	ug/L		28	40 - 120
Hexachlorocyclopentadiene	100	21.6	*	ug/L		22	25 - 120
Hexachloroethane	100	29.4	*	ug/L		29	35 - 120
Indeno[1,2,3-cd]pyrene	100	54.4		ug/L		54	45 - 135
Isophorone	100	69.2		ug/L		69	50 - 120
2-Methylnaphthalene	100	46.3	*	ug/L		46	55 - 120
2-Methylphenol	100	56.5		ug/L		57	50 - 120
3-Methylphenol + 4-Methylphenol	100	58.7		ug/L		59	50 - 120
Naphthalene	100	47.2	*	ug/L		47	55 - 120
2-Nitroaniline	100	74.0		ug/L		74	65 - 120
3-Nitroaniline	100	74.0		ug/L		74	60 - 120
4-Nitroaniline	100	80.4		ug/L		80	55 - 125
Nitrobenzene	100	62.9		ug/L		63	55 - 120
2-Nitrophenol	100	57.0		ug/L		57	50 - 120
4-Nitrophenol	100	83.6		ug/L		84	45 - 120
N-Nitrosodimethylamine	100	58.4		ug/L		58	45 - 120
N-Nitrosodi-n-propylamine	100	62.3		ug/L		62	45 - 120
N-Nitrosodiphenylamine	100	54.2	*	ug/L		54	60 - 120
Pentachlorophenol	100	61.8		ug/L		62	24 - 121
Phenanthrene	100	54.9	*	ug/L		55	65 - 120
Phenol	100	58.0		ug/L		58	40 - 120
Pyrene	100	54.0	*	ug/L		54	55 - 125
1,2,4-Trichlorobenzene	100	37.3	*	ug/L		37	45 - 120
2,4,5-Trichlorophenol	100	62.1		ug/L		62	55 - 120
2,4,6-Trichlorophenol	100	60.2		ug/L		60	55 - 120

Surrogate	LCS %Recovery	LCS Qualifier	Limits
2-Fluorobiphenyl	63		50 - 120
2-Fluorophenol (Surr)	47		30 - 120
Nitrobenzene-d5 (Surr)	64		45 - 120
Phenol-d6 (Surr)	50		35 - 120
Terphenyl-d14 (Surr)	97		10 - 150
2,4,6-Tribromophenol (Surr)	75		40 - 120

TestAmerica Irvine



QC Sample Results

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 440-131885/3-A
 Matrix: Water
 Analysis Batch: 132816

Client Sample ID: Lab Control Sample Dup
 Prep Type: Total/NA
 Prep Batch: 131885

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec.		RPD	
							Limits	RPD	Limit	RPD
Acenaphthene	100	64.3	*	ug/L		64	60 - 120	25	20	
Acenaphthylene	100	67.3	*	ug/L		67	60 - 120	28	20	
Aniline	100	74.1		ug/L		74	35 - 120	2	30	
Anthracene	100	71.2	*	ug/L		71	65 - 120	28	20	
Benzidine	100	86.8		ug/L		87	30 - 160	23	35	
Benzo[a]anthracene	100	65.8		ug/L		66	65 - 120	16	20	
Benzo[a]pyrene	100	65.4		ug/L		65	55 - 130	21	25	
Benzo[b]fluoranthene	100	59.2		ug/L		59	55 - 125	13	25	
Benzo[g,h,i]perylene	100	68.3		ug/L		68	45 - 135	19	25	
Benzoic acid	100	63.6		ug/L		64	25 - 120	12	30	
Benzo[k]fluoranthene	100	72.5	*	ug/L		73	50 - 125	36	20	
Benzyl alcohol	100	79.9	*	ug/L		80	50 - 120	37	20	
Bis(2-chloroethoxy)methane	100	74.3		ug/L		74	55 - 120	10	20	
Bis(2-chloroethyl)ether	100	66.2		ug/L		66	50 - 120	13	20	
bis (2-chloroisopropyl) ether	100	75.6	*	ug/L		76	45 - 120	29	20	
Bis(2-ethylhexyl) phthalate	100	73.8	*	ug/L		74	44 - 124	33	25	
4-Bromophenyl phenyl ether	100	76.2	*	ug/L		76	60 - 120	40	25	
Butyl benzyl phthalate	100	73.9	*	ug/L		74	55 - 130	21	20	
4-Chloroaniline	100	59.9		ug/L		60	55 - 120	17	25	
4-Chloro-3-methylphenol	100	79.3		ug/L		79	60 - 120	12	25	
2-Chloronaphthalene	100	63.5	*	ug/L		64	60 - 120	32	20	
2-Chlorophenol	100	58.0		ug/L		58	45 - 120	11	25	
4-Chlorophenyl phenyl ether	100	67.8	*	ug/L		68	44 - 120	29	23	
Chrysene	100	65.5	*	ug/L		65	65 - 120	22	20	
Dibenz(a,h)anthracene	100	69.5		ug/L		70	50 - 135	19	25	
Dibenzofuran	100	66.7	*	ug/L		67	65 - 120	28	20	
1,2-Dichlorobenzene	100	53.6	*	ug/L		54	40 - 120	26	25	
1,3-Dichlorobenzene	100	48.7		ug/L		49	35 - 120	23	25	
1,4-Dichlorobenzene	100	49.9		ug/L		50	35 - 120	23	25	
3,3'-Dichlorobenzidine	100	25.9	*	ug/L		26	45 - 135	20	25	
2,4-Dichlorophenol	100	66.8		ug/L		67	55 - 120	12	20	
Diethyl phthalate	100	72.0		ug/L		72	55 - 120	9	30	
2,4-Dimethylphenol	100	64.6		ug/L		65	40 - 120	6	25	
Dimethyl phthalate	100	72.7		ug/L		73	30 - 120	6	30	
Di-n-butyl phthalate	100	73.1		ug/L		73	60 - 125	10	20	
4,6-Dinitro-2-methylphenol	100	76.5		ug/L		76	45 - 120	12	25	
2,4-Dinitrophenol	100	68.6	*	ug/L		69	40 - 120	26	25	
2,4-Dinitrotoluene	100	70.2		ug/L		70	65 - 120	5	20	
2,6-Dinitrotoluene	100	70.5		ug/L		70	65 - 120	0	20	
Di-n-octyl phthalate	100	71.3	*	ug/L		71	65 - 135	31	20	
1,2-Diphenylhydrazine(as Azobenzene)	100	70.6		ug/L		71	60 - 120	11	25	
Fluoranthene	100	68.4		ug/L		68	60 - 120	17	20	
Fluorene	100	66.5	*	ug/L		67	65 - 120	23	20	
Hexachlorobenzene	100	76.2	*	ug/L		76	60 - 120	39	20	
Hexachlorobutadiene	100	44.5	*	ug/L		44	40 - 120	47	25	
Hexachlorocyclopentadiene	100	44.3	*	ug/L		44	25 - 120	69	30	
Hexachloroethane	100	41.3	*	ug/L		41	35 - 120	34	25	

TestAmerica Irvine



QC Sample Results

Client: Veolia Water N. America Operating Svcs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

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Method: 8270C - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 440-131885/3-A			Client Sample ID: Lab Control Sample Dup								
Matrix: Water			Prep Type: Total/NA								
Analysis Batch: 132816			Prep Batch: 131885								
Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits		RPD		
							RPD	Limit			
Indeno[1,2,3-cd]pyrene	100	64.0		ug/L		64	45 - 135	16	25		
Isophorone	100	81.3		ug/L		81	50 - 120	16	20		
2-Methylnaphthalene	100	62.4	*	ug/L		62	55 - 120	30	20		
2-Methylphenol	100	66.7		ug/L		67	50 - 120	17	20		
3-Methylphenol + 4-Methylphenol	100	68.2		ug/L		68	50 - 120	15	20		
Naphthalene	100	62.5	*	ug/L		63	55 - 120	28	20		
2-Nitroaniline	100	77.2		ug/L		77	65 - 120	4	20		
3-Nitroaniline	100	69.9		ug/L		70	60 - 120	6	25		
4-Nitroaniline	100	66.1		ug/L		66	55 - 125	19	20		
Nitrobenzene	100	73.0		ug/L		73	55 - 120	15	25		
2-Nitrophenol	100	70.3		ug/L		70	50 - 120	21	25		
4-Nitrophenol	100	72.4		ug/L		72	45 - 120	14	30		
N-Nitrosodimethylamine	100	58.4		ug/L		58	45 - 120	0	20		
N-Nitrosodi-n-propylamine	100	85.0	*	ug/L		85	45 - 120	31	20		
N-Nitrosodiphenylamine	100	71.3	*	ug/L		71	60 - 120	27	20		
Pentachlorophenol	100	89.1	*	ug/L		89	24 - 121	36	25		
Phenanthrene	100	72.4	*	ug/L		72	65 - 120	27	20		
Phenol	100	54.0		ug/L		54	40 - 120	7	25		
Pyrene	100	72.7	*	ug/L		73	55 - 125	29	25		
1,2,4-Trichlorobenzene	100	51.5	*	ug/L		52	45 - 120	32	20		
2,4,5-Trichlorophenol	100	72.8		ug/L		73	55 - 120	16	30		
2,4,6-Trichlorophenol	100	73.4		ug/L		73	55 - 120	20	30		

Surrogate	LCSD		Limits
	%Recovery	Qualifier	
2-Fluorobiphenyl	73		50 - 120
2-Fluorophenol (Surr)	41		30 - 120
Nitrobenzene-d5 (Surr)	72		45 - 120
Phenol-d6 (Surr)	54		35 - 120
Terphenyl-d14 (Surr)	99		10 - 150
2,4,6-Tribromophenol (Surr)	89		40 - 120

Method: 6020 - Metals (ICP/MS)

Lab Sample ID: MB 440-132758/1-A			Client Sample ID: Method Blank						
Matrix: Water			Prep Type: Total Recoverable						
Analysis Batch: 133012			Prep Batch: 132758						
Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Arsenic	ND		1.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Cadmium	ND		1.0	0.25	ug/L		09/23/13 10:35	09/23/13 21:57	1
Chromium	ND		2.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Copper	ND		2.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Lead	0.555	J	1.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Nickel	ND		2.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Selenium	ND		2.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Silver	ND		1.0	0.50	ug/L		09/23/13 10:35	09/23/13 21:57	1
Zinc	ND		20	5.0	ug/L		09/23/13 10:35	09/23/13 21:57	1

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QC Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: 6020 - Metals (ICP/MS) (Continued)

Lab Sample ID: LCS 440-132758/2-A			Client Sample ID: Lab Control Sample						
Matrix: Water			Prep Type: Total Recoverable						
Analysis Batch: 133012			Prep Batch: 132758						
Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
Arsenic	80.0	77.5		ug/L		97	80 - 120		
Cadmium	80.0	76.5		ug/L		96	80 - 120		
Chromium	80.0	78.8		ug/L		99	80 - 120		
Copper	80.0	75.6		ug/L		95	80 - 120		
Lead	80.0	77.3		ug/L		97	80 - 120		
Nickel	80.0	76.3		ug/L		95	80 - 120		
Selenium	80.0	77.5		ug/L		97	80 - 120		
Silver	80.0	77.5		ug/L		97	80 - 120		
Zinc	80.0	81.3		ug/L		102	80 - 120		

Lab Sample ID: 440-57211-1 MS			Client Sample ID: BIO-002						
Matrix: Water			Prep Type: Total Recoverable						
Analysis Batch: 133012			Prep Batch: 132758						
Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Arsenic	49		400	453		ug/L		101	75 - 125
Cadmium	31		400	419		ug/L		97	75 - 125
Chromium	180		400	576		ug/L		100	75 - 125
Copper	2700		400	3590	4	ug/L		231	75 - 125
Lead	220	B	400	590		ug/L		92	75 - 125
Nickel	210		400	618		ug/L		102	75 - 125
Selenium	20	J	400	190	F	ug/L		42	75 - 125
Silver	28		400	357		ug/L		82	75 - 125
Zinc	7300		400	8770	4	ug/L		360	75 - 125

Lab Sample ID: 440-57211-1 MSD			Client Sample ID: BIO-002								
Matrix: Water			Prep Type: Total Recoverable								
Analysis Batch: 133012			Prep Batch: 132758								
Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Arsenic	49		400	438		ug/L		97	75 - 125	3	20
Cadmium	31		400	410		ug/L		95	75 - 125	2	20
Chromium	180		400	558		ug/L		95	75 - 125	3	20
Copper	2700		400	3400	4	ug/L		185	75 - 125	5	20
Lead	220	B	400	547		ug/L		82	75 - 125	8	20
Nickel	210		400	597		ug/L		96	75 - 125	4	20
Selenium	20	J	400	186	F	ug/L		41	75 - 125	2	20
Silver	28		400	363		ug/L		84	75 - 125	2	20
Zinc	7300		400	8010	4	ug/L		171	75 - 125	9	20

Method: 7470A - Mercury (CVAA)

Lab Sample ID: MB 440-131926/1-A			Client Sample ID: Method Blank						
Matrix: Water			Prep Type: Total/NA						
Analysis Batch: 132001			Prep Batch: 131926						
Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020	0.00010	mg/L		09/18/13 14:47	09/18/13 18:36	1

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QC Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

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Method: 7470A - Mercury (CVAA) (Continued)

Lab Sample ID: LCS 440-131926/2-A
 Matrix: Water
 Analysis Batch: 132001

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA
 Prep Batch: 131926

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	0.00800	0.00717		mg/L		90	80 - 120

Lab Sample ID: 440-57184-G-6-B MS
 Matrix: Water
 Analysis Batch: 132001

Client Sample ID: Matrix Spike
 Prep Type: Total/NA
 Prep Batch: 131926

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	ND		0.00800	0.00243	F	mg/L		30	70 - 130

Lab Sample ID: 440-57184-G-6-C MSD
 Matrix: Water
 Analysis Batch: 132001

Client Sample ID: Matrix Spike Duplicate
 Prep Type: Total/NA
 Prep Batch: 131926

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
Mercury	ND		0.00800	0.00252	F	mg/L		32	70 - 130	4	20

Method: SM 2540B - Solids, Total

Lab Sample ID: MB 440-132361/1
 Matrix: Water
 Analysis Batch: 132361

Client Sample ID: Method Blank
 Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	RL Unit	D	Prepared	Analyzed	DII Fac
Total Solids	ND		10	10 mg/L			09/20/13 08:18	1

Lab Sample ID: LCS 440-132361/2
 Matrix: Water
 Analysis Batch: 132361

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Total Solids	1000	996		mg/L		100	90 - 110

Lab Sample ID: 440-57211-1 DU
 Matrix: Water
 Analysis Batch: 132361

Client Sample ID: BIO-002
 Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	Limit
Total Solids	12000		11600		mg/L		3	10

Method: SM 4500 CN E - Cyanide, Total

Lab Sample ID: MB 440-133432/1-A
 Matrix: Water
 Analysis Batch: 133501

Client Sample ID: Method Blank
 Prep Type: Total/NA
 Prep Batch: 133432

Analyte	MB Result	MB Qualifier	RL	MDL Unit	D	Prepared	Analyzed	DII Fac
Cyanide, Total	ND		25	17 ug/L		09/25/13 13:38	09/25/13 18:44	1

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QC Sample Results

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Method: SM 4500 CN E - Cyanide, Total (Continued)

Lab Sample ID: LCS 440-133432/2-A
Matrix: Water
Analysis Batch: 133501

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 133432

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	Limits
Cyanide, Total	200	189		ug/L		95	90 - 110

Lab Sample ID: 440-57243-C-5-B MS
Matrix: Water
Analysis Batch: 133501

Client Sample ID: Matrix Spike
Prep Type: Total/NA
Prep Batch: 133432

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	Limits
Cyanide, Total	ND		200	182		ug/L		91	70 - 115

Lab Sample ID: 440-57243-C-5-C MSD
Matrix: Water
Analysis Batch: 133501

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total/NA
Prep Batch: 133432

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Cyanide, Total	ND		200	182		ug/L		91	70 - 115	0	15

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QC Association Summary

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1



GC/MS VOA

Analysis Batch: 132248

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-56827-C-13 MS	Matrix Spike	Total/NA	Water	8260B	
440-56827-C-13 MSD	Matrix Spike Duplicate	Total/NA	Water	8260B	
440-57211-1	BIO-002	Total/NA	Water	8260B	
LCS 440-132248/5	Lab Control Sample	Total/NA	Water	8260B	
MB 440-132248/4	Method Blank	Total/NA	Water	8260B	

Analysis Batch: 133195

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57184-C-4 MS	Matrix Spike	Total/NA	Water	8260B	
440-57184-C-4 MSD	Matrix Spike Duplicate	Total/NA	Water	8260B	
440-57211-1	BIO-002	Total/NA	Water	8260B	
LCS 440-133195/5	Lab Control Sample	Total/NA	Water	8260B	
MB 440-133195/4	Method Blank	Total/NA	Water	8260B	

GC/MS Semi VOA

Prep Batch: 131885

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	3520C	
LCS 440-131885/2-A	Lab Control Sample	Total/NA	Water	3520C	
LCS 440-131885/3-A	Lab Control Sample Dup	Total/NA	Water	3520C	
MB 440-131885/1-A	Method Blank	Total/NA	Water	3520C	

Analysis Batch: 132816

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCS 440-131885/3-A	Lab Control Sample Dup	Total/NA	Water	8270C	131885
MB 440-131885/1-A	Method Blank	Total/NA	Water	8270C	131885

Analysis Batch: 133018

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	8270C	131885
LCS 440-131885/2-A	Lab Control Sample	Total/NA	Water	8270C	131885

Metals

Prep Batch: 131926

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57184-G-6-B MS	Matrix Spike	Total/NA	Water	7470A	
440-57184-G-6-C MSD	Matrix Spike Duplicate	Total/NA	Water	7470A	
440-57211-1	BIO-002	Total/NA	Water	7470A	
LCS 440-131926/2-A	Lab Control Sample	Total/NA	Water	7470A	
MB 440-131926/1-A	Method Blank	Total/NA	Water	7470A	

Analysis Batch: 132001

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57184-G-6-B MS	Matrix Spike	Total/NA	Water	7470A	131926
440-57184-G-6-C MSD	Matrix Spike Duplicate	Total/NA	Water	7470A	131926
LCS 440-131926/2-A	Lab Control Sample	Total/NA	Water	7470A	131926
MB 440-131926/1-A	Method Blank	Total/NA	Water	7470A	131926

TestAmerica Irvine

QC Association Summary

Client: Veolia Water N. America Operating Srvs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1



Metals (Continued)

Analysis Batch: 132115

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	7470A	131926

Prep Batch: 132758

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total Recoverable	Water	3005A	
440-57211-1 MS	BIO-002	Total Recoverable	Water	3005A	
440-57211-1 MSD	BIO-002	Total Recoverable	Water	3005A	
LCS 440-132758/2-A	Lab Control Sample	Total Recoverable	Water	3005A	
MB 440-132758/1-A	Method Blank	Total Recoverable	Water	3005A	

Analysis Batch: 133012

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total Recoverable	Water	6020	132758
440-57211-1 MS	BIO-002	Total Recoverable	Water	6020	132758
440-57211-1 MSD	BIO-002	Total Recoverable	Water	6020	132758
LCS 440-132758/2-A	Lab Control Sample	Total Recoverable	Water	6020	132758
MB 440-132758/1-A	Method Blank	Total Recoverable	Water	6020	132758

General Chemistry

Analysis Batch: 132361

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	SM 2540B	
440-57211-1 DU	BIO-002	Total/NA	Water	SM 2540B	
LCS 440-132361/2	Lab Control Sample	Total/NA	Water	SM 2540B	
MB 440-132361/1	Method Blank	Total/NA	Water	SM 2540B	

Prep Batch: 133432

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	Distill/CN	
440-57243-C-5-B MS	Matrix Spike	Total/NA	Water	Distill/CN	
440-57243-C-5-C MSD	Matrix Spike Duplicate	Total/NA	Water	Distill/CN	
LCS 440-133432/2-A	Lab Control Sample	Total/NA	Water	Distill/CN	
MB 440-133432/1-A	Method Blank	Total/NA	Water	Distill/CN	

Analysis Batch: 133501

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-57211-1	BIO-002	Total/NA	Water	SM 4500 CN E	133432
440-57243-C-5-B MS	Matrix Spike	Total/NA	Water	SM 4500 CN E	133432
440-57243-C-5-C MSD	Matrix Spike Duplicate	Total/NA	Water	SM 4500 CN E	133432
LCS 440-133432/2-A	Lab Control Sample	Total/NA	Water	SM 4500 CN E	133432
MB 440-133432/1-A	Method Blank	Total/NA	Water	SM 4500 CN E	133432

Definitions/Glossary

Client: Veolia Water N. America Operating Svcs
 Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

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Qualifiers

GC/MS VOA

Qualifier	Qualifier Description
F	MS/MSD Recovery and/or RPD exceeds the control limits

GC/MS Semi VOA

Qualifier	Qualifier Description
*	LCS or LCSD exceeds the control limits
*	RPD of the LCS and LCSD exceeds the control limits
X	Surrogate is outside control limits
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Metals

Qualifier	Qualifier Description
F	MS/MSD Recovery and/or RPD exceeds the control limits
B	Compound was found in the blank and sample.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
4	MS, MSD: The analyte present in the original sample is 4 times greater than the matrix spike concentration; therefore, control limits are not applicable.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Certification Summary

Client: Veolia Water N. America Operating Srvs
Project/Site: Semi-Annual Sludge

TestAmerica Job ID: 440-57211-1

Laboratory: TestAmerica Irvine

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Alaska	State Program	10	CA01531	06-30-14
Arizona	State Program	9	AZ0671	10-13-13
California	LA Cty Sanitation Districts	9	10256	01-31-14
California	NELAP	9	1108CA	01-31-14
California	State Program	9	2706	06-30-14
Guam	State Program	9	Cert No. 12.002r	01-28-14 *
Hawaii	State Program	9	N/A	01-31-14
Nevada	State Program	9	CA015312007A	07-31-14
New Mexico	State Program	6	N/A	01-31-14
Northern Mariana Islands	State Program	9	MP0002	01-31-14
USDA	Federal		P330-09-00080	06-06-14
USEPA UCMR	Federal	1	CA01531	01-31-15

* Expired certification is currently pending renewal and is considered valid

TestAmerica Irvine

Login Sample Receipt Checklist

Client: Veolia Water N. America Operating Srvs

Job Number: 440-57211-1

Login Number: 57211
 List Number: 1
 Creator: Chavez, Elizabeth

List Source: TestAmerica Irvine

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact	N/A	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	OPS
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <math><6\text{mm}</math> (1/4")	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	N/A	
Residual Chlorine Checked.	N/A	



INSPECTION PROCEDURES

City of Richmond
450 Civic Center Plaza
Richmond, CA 94804

1. STORM WATER INSPECTIONS:

Stormwater from Process Area ("Contaminated Stormwater")

Every year during the spring and summer, all IUs (designated as storm water dischargers in Compliance Monitoring and Inspection Schedule) need prescheduled inspections or telephone interviews regarding their on-site water collection and discharge systems. This is storm water that due to its contact with a process area will be discharged to the sanitary sewer.

2. COMPLIANCE INSPECTIONS:

Inspections are carried out on all Significant IUs every year after Permit Applications are received and before Permits are written. Unless corrected in a reasonable amount of time, deficiencies found in inspections are included as conditions in the permit issued. Categorical IUs are inspected every six (6) months if needed or at least once per year. Compliance inspections are set at pre-arranged times with the most knowledgeable IU representative available. A walk-through inspection is done for any and all applicable items in a Industrial Inspection Report@ checklist (Appendix B). Afterwards, a post-inspection conference is held and summarized in writing. Recommendations for Compliance Activity are added at the end of the report.

3. FIRST TIME INSPECTION FOR NEW BUSINESSES:

The first time a business is inspected, an appointment will be made ahead of time. We explain what information is required to determine the nature of on-site activities, and subsequently if business needs a Waste Water Permit or a change in discharge methods to bring the facility into compliance with the City of Richmond's Ordinance. At the appointment, the business operator is asked about any operations which might generate wastes, and industrial wastewater. A walk-through inspection is performed using the a Industrial Inspection Report@ (see Appendix B). If items are out of compliance with the City of Richmond's Ordinance, the Inspector informs the business what violations exist and discusses how to approach achieving compliance. If the facility discharges non-domestic waste(s) to the sanitary sewer, they need to complete a Permit Application and obtain a Permit. Otherwise, they must disconnect from the sanitary sewer and properly dispose of all waste(s) generated on site. If the facility is discharging industrial waste(s) to storm drain(s), water, ground, or other place not permitted in the City of Richmond's Ordinance, they must immediately abate this activity. One way this can be accomplished is to have the Facility connect the industrial discharge to the sanitary sewer after obtaining a permit. Correction of deficiencies found during the inspection would be included as conditions in the Permit issued by the City of Richmond.

4. COMMERCIAL INSPECTIONS:

The City of Richmond passed an amendment to sewer ordinance 12.20. It required calculating sewer service charges on flow, biochemical oxygen demand and total suspended solids loading. Commercial inspections continue to be performed on all the commercial businesses that are not on permit, to collect flow data and assess sampling locations for loading. This is determined by the City's new business listing, and inspector field activity.

5. FATS OILS & GREASE (FOG) INSPECTIONS:

The City of Richmond updated ordinance 12.18.066 that specifically addresses best management practices, FOG removal device maintenance, and disposal of waste FOG. Inspection criteria are measured on a scale of 1 to 5. If the overall average is less than 3 monthly inspections with an associated fee are conducted and greater than 3 are re-inspected at 1 to 3 year intervals.

F-2 Compliance Inspection Form



Detailed Site Information

Company Name: _____ Permit Expiration: _____
 Facility Location: _____
 Business License Current Yes No Federal Category Yes No 40CFR# _____

A. Facility Information

Facility Contact Name	Title	Email	Phone
Legally Responsible Official	Title	Email	Phone
Property Owner Name	Title	Email	Phone

Business Description:

# of Employees	Days of Operation	Hours

Comments:

B. Enforcement Activity

1. Is facility in SNC	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Enforcement action(s) taken since last inspection	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A



Permitted Industrial Inspection Summary/Actions

Inspection Summary

Date: Time Start: Time End: Duration:

Company Name:

Facility Location:

Inspector: Phone: Email:

Attendees at Inspection:

Compliance Issues, Required Actions and Due Dates

Follow-up Required: Yes No

--

Comments, Observations and Concerns

--

Additional Comments

To receive entire inspection report please email inspector for URL

C. Production and Site Activity

1. Manufacturing or site activity block diagram current	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Site diagram current (sewer connection, hazmat)	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
3. Provide a brief overview of production activity including; average production quantity, principal raw materials, principal products produced			
4. Comments, Observations and Concerns	<input type="radio"/> Yes	<input type="radio"/> No	
5. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes	<input type="radio"/> No	

D. Water Usage

1. Submitted Industrial Discharge Permit Application Renewal	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Process water discharged annually from Permit Application			
2. Reverse osmosis and water softeners	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
3. Comments, Observations and Concerns	<input type="radio"/> Yes	<input type="radio"/> No	
4. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes	<input type="radio"/> No	

F. Pretreatment System

1. Brief description

2. Treatment flow diagram current Yes No N/A

3. Chemistry used Yes No N/A

Chemicals Used

4. Alarm descriptions and procedures or issues

5. Operational difficulties (I.e. staffing, chemistry, process) Yes No N/A

Summary of previous operational difficulties

6. Reviewed electronic records/logs for treatment system Yes No N/A

7. Is bypass possible Yes No N/A

8. Treatment generates sludge Yes No N/A

9. Changes to pretreatment system Yes No N/A

10. Maintenance / Training Schedules

Monitoring equipment (pH, Turbidity, etc.)

Alarm system Testing Annual N/A

Discharge meter calibration Annual Last Date: N/A

Changes to operations staffing Yes No N/A

Operator training frequency Annual N/A

Operator training records up to date Yes No N/A

11. Comments, Observations and Concerns Yes No

12. Compliance Issues, Required Actions and Due Dates Yes No

G. Monitoring Information

1. Self Monitoring on site for 3 years	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Sampling plan on file	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
3. Comments, Observations and Concerns	<input type="radio"/> Yes		<input type="radio"/> No
4. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes		<input type="radio"/> No

H. Hazardous and Non Hazardous Waste

1. Does the facility generate hazardous waste (spent solvents, acid, oils, solids, etc.)	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A		
2. Discharge of hazardous waste to sewer system	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A		
3. Annual routine hauled waste from facility					
Waste / Area	Hazardous		Quantity	Frequency	Vendor
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
	<input type="radio"/> Yes	<input type="radio"/> No			
4. Comments, Observations and Concerns	<input type="radio"/> Yes		<input type="radio"/> No		
5. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes		<input type="radio"/> No		

I. Accidental Spill/Slug/Toxic Organic Management Plan

1. Date last reviewed by City:	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Spills to sanitary sewer since the last inspection	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
3. Comments, Observations and Concerns	<input type="radio"/> Yes		<input type="radio"/> No
4. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes		<input type="radio"/> No

J. House Keeping

1. Comments, Observations and Concerns	<input type="radio"/> Yes	<input type="radio"/> No
2. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes	<input type="radio"/> No

K. Storm Water or Ground Water Issues

1. Roof or outside drains connected to the City sewer	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Ground water discharged to the City sewer	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
3. Comments, Observations and Concerns	<input type="radio"/> Yes	<input type="radio"/> No	
4. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes	<input type="radio"/> No	

L. Modifications

1. Are any modifications or changes anticipated in the next three years	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
2. Comments, Observations and Concerns	<input type="radio"/> Yes	<input type="radio"/> No	
3. Compliance Issues, Required Actions and Due Dates	<input type="radio"/> Yes	<input type="radio"/> No	

M. Additional Comments

Is the company aware of the California Water Environment Association P3S Facility of the Year Award	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A

F-3 Sampling Protocols (to be submitted later)

F-4 Chain-of-Custody Form

F-5 Enforcement Response Plan



City of Richmond

ENFORCEMENT RESPONSE PLAN

Enforcement Response Plan

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Appendix A: Acronyms and Definitions

INTRODUCTION

The City of Richmond (City) is required under Federal law to implement a Pretreatment Program to regulate non-domestic discharges to the Richmond Municipal Sewer District Water Pollution Control Plant (WPCP) for the purpose of protecting it against interference, upset, and pass-through and protecting WPCP personnel and public health and safety. The City of Richmond Sewer Use Ordinance provides the standards and legal authority for enforcement of the Pretreatment Program as well as the detailed procedures for implementing Title 40 of the Code of Federal Regulations (40 CFR) Part 403.8(f)(1)-(2), which implements pretreatment standards. The Sewer User Ordinance also includes detailed administrative enforcement procedures and civil and criminal penalties for violations.

Pursuant to 40 CFR Part 403.8(f)(5), the City has developed this Enforcement Response Plan (ERP) to outline and direct Pretreatment Program staff on the appropriate steps for identifying and documenting violations of wastewater discharge permits, the Sewer Use Ordinance, or any other Pretreatment Program Standards or Requirements and taking appropriate enforcement actions. All non-domestic Users of the WPCP are subject to this ERP.

This ERP has been prepared following the United States Environmental Protection Agency's (EPA's) *Guidance for Developing Control Authority Enforcement Response Plans* (ERP Guidance). The ERP is organized into the following sections:

- Enforcement responsibilities;
- Procedures to identify and evaluate instances of noncompliance;
- Enforcement tools; and
- Enforcement Response Guide.

ENFORCEMENT RESPONSIBILITIES

Per existing authorities, the Pretreatment Coordinator is the official responsible for each type of enforcement response described, herein.

Duties of the Source Control Coordinator

The Source Control Coordinator is responsible for day-to-day implementation and enforcement of the Source Control Program. The Source Control Coordinator is also authorized to solicit the assistance of local, county, state, and federal law enforcement agencies as deemed necessary. The Source Control Coordinator ensures that the ERP is followed in a timely and consistent manner. To achieve this, the Source Control Coordinator conducts the following duties:

- Reviews violations and makes a final determination on the level of enforcement to take.
- Ensures that compliance actions taken are consistent and timely.
- Signs routine enforcement actions such as Notices of Violation (NOVs).
- Reviews User response letters to enforcement actions to ensure the response adequately addresses compliance issues.
- Coordinates and moderates compliance meetings and the preparation of compliance schedules.
- Reviews User compliance history reports.
- Compiles compliance reports for the semi-annual and annual pretreatment program compliance reports.
- Communicates and coordinates with associated regulatory agencies.
- Prepares referrals with the City Attorney to the District Attorney's Office for criminal prosecution.

Duties of the Source Control Inspector

The primary duties of the Source Control Inspector are to process enforcement actions in a timely manner by identifying violations and assist the Source Control Coordinator with tracking compliance issues and schedules. To achieve this, the Source Control Inspector conducts the following duties:

- Reviews monitoring results and identifies non-domestic wastewater discharge violations.
- Reviews self-monitoring reports and WPCP influent and effluent results to verify discharge violations.
- Prepares monthly compliance reports.
- Reviews User compliance history reports with the Source Control Coordinator.

Enforcement Response Plan

- Prepares routine enforcement actions, and makes recommendations to the Source Control Coordinator.
- Assists in the preparation and running of compliance meetings.
- Tracks User's response to NOVs, Compliance Meetings, and Compliance Schedules.
- Reviews, with the Source Control Coordinator, User's response letters to enforcement actions to ensure the response adequately addresses compliance issues.
- Prepares non-routine compliance letters (e.g., Administrative Orders and Citations).
- Prepares enforcement documentation including case referral reports and warrant request summaries.
- Tracks all enforcement actions in a database.

Duties of the City Attorney

The primary duties of the City Attorney with respect to the Source Control Program are to provide legal consultation as requested by the Source Control Coordinator and process enforcement actions in a timely manner. To achieve this, the City Attorney conducts the following duties:

- Provides legal consultation as requested by the Source Control Coordinator on consent agreements and administrative orders.
- Assists with obtaining an administrative warrant to inspect or sample a facility, if consent for access was denied.
- Oversees all referrals for civil litigation and City-initiated criminal investigations.

PROCEDURES TO IDENTIFY AND EVALUATE INSTANCES OF NONCOMPLIANCE

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

Non-Domestic User Inventory

An essential step for identifying noncompliance is to accurately account for who is discharging non-domestic waste to the City sewer system, where they are located, and the nature and volume of the waste being discharged. The Engineering Services Department 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 the review of compliance data obtained from self-monitoring reports submitted to the City by Users, and information obtained by the City from: 1) routine City inspections of permitted Users; 2) referral follow-up inspections; 3) routine sewer system sampling; and 4) direct sampling of sewer connections.

Compliance data from self-monitoring reporting, routine inspections, or sampling events are screened and entered into a database. The City uses the database to compile compliance data, assist with monitoring of compliance due dates, create wastewater discharge permits, and summarize data for reporting. Source Control Program staff complete this initial data screening and data entry activities within five (5) days of receipt. Prompt screening of compliance data is important if no prior notification by the User was made, and a problem is noted that requires immediate City 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. Source Control Program staff is trained to review compliance data for both discharge and non-discharge violations, and to provide notification to the Source Control Coordinator.

When the initial screening suggests noncompliance, the Source Control Inspector or Source Control Coordinator performs further data evaluation. If noncompliance is verified, then enforcement actions are initiated as appropriate.

Inspection and Sampling

Inspection and verification sampling are another method by which Source Control Program staff obtains compliance data other than that which is obtained directly from the Users. Verification sampling that is performed by the City may seem redundant since self-monitoring is a User requirement, but in fact verification monitoring is a Federal pretreatment program requirement. The authority to perform verification

Enforcement Response Plan

monitoring exists under the Section 12.18.060.8 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 Significant Industrial User (SIU) per Federal regulations;
- Response to known or suspected compliance problems;
- Investigation of slug loads; or
- Verification of corrective actions required of the User by the City.

The City monitors wastewater from each SIU at least once per year. The City 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, the City conducts a comprehensive inspection of each SIU. The City follows inspection procedures to ensure consistent, thorough, and well-documented inspections.

Other non-domestic Users are inspected to verify monitoring and recordkeeping requirements on a routine basis commensurate with the perceived risk posed to the City sanitary sewer system 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 the City is used to verify compliance status and to determine if an enforcement response must be initiated or continued.

Typical Instances of Noncompliance

Sections 12.18.100 and 12.18.110 of the Sewer Use Ordinance sets the legal authority for the City to assess administrative and judicial remedies when a User has violated or continues to violate any provision of the Sewer Use Ordinance, wastewater discharge permit or order issued hereunder, or any other Pretreatment Standard or Requirement. Offense(s) deemed a violation shall include without limitation:

- Denied right-of-entry or access to applicable records;
- Discharge of prohibited wastes;
- Discharge of drainage water or groundwater, except as approved by the City;
- Unreported/unauthorized bypass of pretreatment;
- Failure to install and maintain a sample port and/or a control manhole;
- Illegal discharge;
- Violation of Categorical Pretreatment Standards/Local Limits;
- Discharging to the City sewer system without first securing a waste discharge permit;
- Falsifying information; or

- Noncompliance of enforcement actions (i.e., administrative orders).

Evaluating the Degree of Noncompliance

The ERP describes violations and indicates minimum enforcement actions. If multiple violations for one or more parameters occur during a calendar day, the User will only be issued one enforcement action, and all violations will be listed. If multiple violations have occurred over a number of days, those violations will be grouped by day; and each group of violations will be issued an enforcement action.

When considering the type of enforcement action to take, the Enforcement Response Guide provides a minimum standard. Chapter 4.1 of the ERP Guidance discusses the six criteria that the City 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 standard, written documentation will detail the reasons for the increased enforcement action. The six criteria for evaluating the degree of noncompliance are:

- **Magnitude of the Violation.** Generally an isolated instance of noncompliance can be met with an enforcement response listed in the Enforcement Response Guide. However, since even an isolated violation could threaten public health and the environment, damage public and private property, or threaten the integrity of the City's program, the enforcement response to this type of violation must be escalated to: 1) mitigate the violation quickly; 2) prevent a reoccurrence of violation(s); 3) provide an appropriate level of response; and 4) provide for cost recovery as appropriate.
- **Duration of the Violation.** Violations (regardless of severity) which continue over prolonged periods of time should subject the User to escalated enforcement actions. The City's response to these situations must prevent extended periods of noncompliance from occurring.
- **Effects of the Violation on the Receiving Water.** One of the primary objectives of the Source Control Program is to prevent pollutants from "passing through" the WPCP and entering the receiving waters. Consequently, any violation which results in environmental harm warrants an escalated enforcement response. Environmental harm will be presumed whenever a non-domestic User discharges a pollutant into the sanitary sewer system which:
 - Passes through the WPCP and causes a violation of the City's National Pollutant Discharge Elimination System (NPDES) permit effluent limits.
 - Has a toxic effect on the receiving water and causes a violation of the City's NPDES permit. A minimum response to these types of violations would be an administrative order and referral to the City Attorney. In addition, the response should ensure the recovery from the User of any NPDES permit-

Enforcement Response Plan

related fines and penalties paid by the City. Termination of service may also be considered for repeat violations.

- **Effect of the Violation on the WPCP.** Some violations may have negative impact on WPCP operations and/or personnel. These violations can result in increased treatment cost, upsets to treatment processes, interference, or harm to WPCP personnel or equipment. A minimum response to these types of violations would be an administrative order and referral to the City Attorney. In addition, the response should ensure the recovery from the User of any costs by the City resulting from the violation, directly or indirectly.
- **Compliance History of the User.** When evaluating the level of enforcement action to be taken for a violation, the last eighteen (18) months of compliance history of the User shall be reviewed. If a pattern of recurring violations for the same pollutant is noted, then an escalated enforcement action may be warranted. As an example: if two Letter of Warnings have been issued in the past two months for pH discharge violations, and the User has another violation at the same level, then it would be appropriate to escalate the enforcement action to a Warning Notice. If 50% of the samples taken in the past eighteen (18) months were in violation, then it would be warranted to increase the enforcement action. Any escalation of enforcement action will be documented. This documentation will include all details for the increased enforcement.
- **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 compliance, coupled with actions which give support to this intention. However, "good faith" does not eliminate the necessity of any enforcement action.

ENFORCEMENT TOOLS

Sections 12.18.100 and 12.18.110 of the Sewer Use Ordinance outline the types of enforcement tools available to the Source Control Coordinator that may be taken on Users who are not in compliance with wastewater discharge permit conditions, previous enforcement actions, and Pretreatment Standards and Requirements. Each of these types of enforcement actions are presented below.

Typical Enforcement Actions

Letter of Warning

A Letter of Warning is generally issued for an isolated non-significant violation. In this case, the inspector notifies the User (in writing) that a violation occurred and directs the User to take corrective actions. This notification serves as the enforcement action. The Letter of Warning will be placed in the City's file. The inspector may schedule additional inspections and/or sampling, or may elect to implement more stringent enforcement action.

Initiation of enforcement action beyond a Letter of Warning must be reviewed and approved by the Source Control Coordinator.

Notice of Violation

A more stringent enforcement action may be the issuance of a Notice Of Violation (NOV) in place of a Letter of Warning in cases where there have been previous recent violations for the same pollutant and according to the guidelines. The NOV is generally issued for a significant violation and it usually applies when there is evidence of neglect or intent to harm. The NOV documents the type of violation that occurred and directs the User to identify and correct the cause of the violation. The NOV form must be signed by the addressee on the NOV and returned to the Inspector. In the case where the User refuses to sign the NOV, the Inspector will issue a formal citation and note on the NOV form that User "refused to sign." If the citation issued by the Inspector is not signed by the User, than the inspector, acting as a code enforcement officer, may escalate the enforcement by submitting a formal criminal arrest/investigation report to the District Attorney's office.

The User is required to respond in writing, within fourteen (14) days, describing the cause of the violation and the corrective actions taken. The User is typically provided with two (2) to four (4) weeks to correct the violation. This timeframe may be extended, given sufficient justification.

Notice of Violation Follow Up

The Source Control Coordinator, once the NOV has been formally issued, will be required to send a follow-up correspondence to the User within fourteen (14) days of the User's response to the NOV. Follow-up correspondence from the Source Control Coordinator will continue, as deemed necessary by the Source Control Coordinator,

until the User's Source Control Inspector has signed the original NOV. In addition, the site will be monitored monthly for a minimum of three months until three consecutive samples indicate that the facility is no longer in violation.

Compliance Meeting

Compliance Meetings are held when severe violations occur or when previous violations appear to remain uncorrected as evidenced by repeated violations. Many NOVs do not require a compliance meeting. The Enforcement Response Guide details when compliance meetings are required. During a compliance meeting, a compliance schedule and timeline are established for the User to correct the violation. Progress on the compliance schedule is tracked by the inspector and reported to the Source Control Coordinator. Compliance schedules are fulfilled when all tasks are completed and consistent compliance is achieved. The wastewater discharge permit may be modified to include the provisions of a compliance schedule.

A compliance meeting is generally scheduled when:

- The User exceeds five (5) times the applicable discharge limit for any toxic pollutant or violates any California State Hazardous Waste limit.
- The User has a pH violation of less than two (2) or greater than twelve (12) or has two NOVs in a two-month period.
- The User has demonstrated a pattern of noncompliance. A pattern of noncompliance would include:
 - The User has been listed in accordance with the Regional Water Quality Control Board (Regional Water Board) Standard Provisions (1991) as inconsistently achieving compliance or as having significantly violated applicable pretreatment requirements for two consecutive quarters for the same pollutant;
 - A User has four (4) or more NOVs in a five- (5-) month period for any Sewer Use Ordinance violation; or
 - Failure to respond to an NOV within forty-five (45) days of the due date.

A maximum of two (2) compliance meetings per pollutant, within a two- (2-) year period, may be held to address noncompliance before more stringent enforcement actions are considered. In cases of severe noncompliance, or when the User has already had two (2) previous compliance meetings, the wastewater discharge permit may be modified to include the provisions of a compliance schedule.

Violations which occur during the implementation of a compliance schedule, and which involve the pollutant(s) addressed by the compliance schedule, may be documented through enforcement actions of a lesser degree than indicated in the Enforcement Response Guide, if short-term measures have been implemented to prevent violations. If a facility is under a compliance schedule and receives an enforcement action less

than what is called for in the procedures, the inspector must write the following on the enforcement action approval form:

- That the enforcement action is less severe than the procedural requirement because the facility is under a compliance schedule; and
- Reference the specific compliance meeting.

This process allows for the documentation of all violations without excessively penalizing a User who is actively working to correct the violation.

Escalated Enforcement Actions

Almost all cases of noncompliance are corrected by following the routine types of enforcement actions listed above and in the Enforcement Response Guide. 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 the City include: consent orders, compliance orders, cease and desist orders, and termination of service or revocation of wastewater discharge permit.

Consent Orders

Consent orders document noncompliance and include actions required to be accomplished by specific dates. Consent orders are developed during compliance meetings and both parties agree to terms. Consent orders have the same force and effect as administrative orders, and can be judicially enforced.

Compliance Orders

Compliance orders direct a User to achieve or restore compliance by a date specified in the order. A compliance order is often a stipulated agreement that may include a compliance schedule, additional self-monitoring and BMPs, the payment of monetary penalties, or cost recovery for and the imposition of fines when milestones are not met. If a User fails to comply with a compliance order, sewer service may be discontinued. A compliance order may not extend the deadline for compliance established by a Pretreatment Standard or Requirement. Compliance orders also do not relieve a User of its liability for any violation or continuing violation.

Cease and Desist Orders

A cease and desist order directs a User to immediately comply with all requirements or take appropriate remedial or preventative action as needed to address continuing or threatened violation including immediately halting operations and/or terminating discharge altogether. This declaration is issued by the Director of Engineering Services and includes:

- A summary of the enforcement actions on the User,

- A deadline for a resolution,
- A summary of consequences for continued non-compliance, and
- A monetary penalty (optional, per judgment of Director of Engineering Services).

Termination of Service or Revocation of Wastewater Discharge Permit

The City may issue an order to a noncompliant User of its intent to revoke the User's wastewater discharge permit or terminate sewer service. The Director of Engineering Services will have the authority to issue these notices and actions against a User.

In rare 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 User's 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.

Administrative Fines

Administrative fines may be issued when regulations from the Sewer Use Ordinance are violated. Fines are assessed in accordance with Section 12.18.100.6 of the Sewer Use Ordinance. The Enforcement Response Guide indicates the fine amount based on the severity of the violation. The Director of Engineering Services will render a decision based on the testimony of both Source Control Program staff and the User.

Judicial Enforcement Actions

In the event that a User fails to comply with City-initiated enforcement actions, the City may seek judicial remedies, including, but not limited to, injunctive relief, civil penalties, and criminal prosecution, through the City Attorney. For case referrals, the City Attorney is consulted and is the lead agent in developing the referral document.

In addition to the above, violations of the California State Hazardous Waste limits may be referred to the District Attorney.

Injunctive Relief

The City Attorney may seek injunctive relief through the court system to restrain or compel specific performance of the User to comply with its wastewater discharge permit and/or order or other requirement imposed by the City.

Civil Penalties

The City Attorney may initiate a civil lawsuit against a User in violation of its wastewater discharge permit, Sewer Use Ordinance, or any other Pretreatment Standard or Requirement. Civil penalties may include fines, 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

The City Attorney may initiate criminal prosecution against a User who willfully or negligently violates its wastewater discharge permit, City Sewer Ordinance, or any other Pretreatment Standard or Requirement. The User may be subject, upon conviction to financial penalties and/or imprisonment.

Increase in Monitoring

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. For violations in the NOV range, the following minimum sampling schedule will be established: one follow-up sample will be taken within thirty (30) days by the User and/or the City. Monthly monitoring will continue at the facility until at least three consecutive sample results, over a three-month period, indicate the discharge is no longer in violation.

In addition to the sampling, one follow-up inspection will be conducted to verify that the violation has been corrected. At this time, the Inspector may allow a return to the Users normal sampling schedule if it is reasonable that the User will no longer have the capacity to be in violation and has implemented previously agreed upon corrective actions.

Significant Noncompliance Publication

Pursuant of Section 12.18.090 of the Sewer Use Ordinance, the City will publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the WPCP, a list of Users that, at any time during the previous twelve (12) months, were in significant noncompliance with applicable Pretreatment Standards and Requirements.

ENFORCEMENT RESPONSE GUIDE

This tabulated Enforcement Response Guide designates several enforcement options for different violations or noncompliance. Source Control Program staff will select the appropriate response from the guide once a violation has been detected and recommend an action to the Source Control Coordinator. The Source Control Coordinator (or authorized delegate) must use best professional judgment to develop a response for any given violation based on the factors presented in this document. The Source Control Coordinator must approve all enforcement actions recommended by Source Control Program staff. 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 Enforcement Response Guide may also be subject to administrative fines.

Enforcement Response Plan

Table 1. City of Richmond Enforcement Response Guide

Sewer Use Ordinance Reference	Type of Violation	Degree and/or Nature of Violation			Enforcement Response
		Slight	Moderate	Severe	
Section 12.18.020.1(B)(2)	Discharge of corrosive substance	Slight	Continuous (log or chart) pH of less than 6.0 for less than 60 minutes		Letter of Warning
		Moderate	Instantaneous pH less than 4.0 or continuous (log or chart) pH for less than 4.0 for more than 60 minutes		Notice of Violation
		Severe	2 NOVs in a 2-month period or pH less than 2 or greater than 12		Compliance Meeting
Section 12.18.020.4	Discharge of toxic pollutants <ul style="list-style-type: none"> Violation of local limits or federal categorical limits 	Slight	Less than two (2) times the limit		Letter of Warning
		Moderate	More than two (2) times, but below five (5) times the limit		Notice of Violation
		Severe	More than five (5) times the limit Any exceedance that adversely impacts the WPCP or the environment		Notice of Violation Compliance Meeting
Sections 12.18.060.1, 12.18.060.2, 12.18.060.4	Late submittal of discharge reports <ul style="list-style-type: none"> Self-monitoring Baseline monitoring Compliance 	Slight	Less than five (5) days late		Document, but no further action
		Moderate	Five (5) to forty-five (45) days late		Letter of Warning
		Severe	More forty-five (45) days late		Notice of Violation (also document as SNC)
Section 12.18.020.6	Use of dilution waters	Moderate	Initial violation, no known harm		Notice of Violation
		Severe	Initial violation which resulted in harm to the WPCP or the environment, or any recurring violation		Compliance Meeting
Sections 12.18.060.10, 12.18.060.11	Improper monitoring <ul style="list-style-type: none"> Improper sampling and analysis Failure to maintain monitoring facilities 	Slight	Initial violation		Letter of Warning
		Moderate	Recurring violation or failure to correct within thirty (30) days		Notice of Violation
		Severe	Failure to correct, greater than thirty (30) days		Compliance Meeting

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Sewer Use Ordinance Reference	Type of Violation	Degree and/or Nature of Violation		Enforcement Response
			after due date	
Sections 12.18.060.6, 12.18.060.8	Failure to notify of permit condition(s) violation	Moderate	Initial violation	Letter of Warning
		Severe	Recurring violation	Notice of Violation
Section 12.18.060.2	Failure to meet compliance schedule milestone	Slight	Less than five (5) days late	Document, but no further action
		Moderate	Five (5) to thirty (30) days late	Letter of Warning
Section 12.18.020.4(C)	Failure to comply with Best Management Practices	Severe	More than thirty (30) days late	Notice of Violation
		Moderate	More than ninety (90) days late	Significant Noncompliance
Section 12.18.070.1	Impeding inspection procedures <ul style="list-style-type: none"> • Deny access to inspectors • Withhold copies of records from inspectors 	Moderate	Initial violation	Letter of Warning
		Severe	Recurring violation	Notice of Violation
Sections 12.18.060.14, 12.18.130.3	Falsification of information <ul style="list-style-type: none"> • False statements • Wastewater diverted from monitoring or pretreatment equipment 	Moderate	Initial violation	Notice of Violation
		Severe	Recurring violation	Compliance Meeting and/or Administrative Order
Sections 12.18.040.2-12.18.040.6, 12.18.050.7	Discharge without a permit	Moderate	Application not received within thirty (30) days of notification	Notice of Violation
		Severe	Application more than thirty (30) days late	Compliance Meeting and/or Administrative Order

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Sewer Use Ordinance Reference	Type of Violation	Degree and/or Nature of Violation		Enforcement Response
		Moderate Severe	Initial violation Recurring violation	
Section 12.18.030.2	Failure to install or properly maintain grease removal devices, failure to maintain pumping or cleaning records			Letter of Warning Notice of Violation
Section 12.18.020.1(B)(1), 12.18.020.1(B)(3)	Discharge into a storm drain, discharge of viscous or solid matter, discharge of hot, flammable or explosive substances	Severe	Any violation	Notice of Violation and/or Administrative Order Other actions such as discharge permit suspension, termination of service, water supply severance, and judicial enforcement

ACRONYMS

AO	Administrative Order
BMP	Best Management Practices
BOD	Biochemical Oxygen Demand
CA	Control Authority
CCR	California Code of Regulations
CFR	Code of Federal Regulations
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
ERP	Enforcement Response Plan
IU	Industrial User
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
RCRA	Resource Conservation and Recovery Act
RWQCB	California Regional Water Quality Control Board, San Francisco Bay Region
SNC	Significant Noncompliance
SWDA	Solid Waste Disposal Act
TSS	Total Suspended Solids
WPCP	Richmond Municipal Sewer District Water Pollution Control Plant

DEFINITIONS

Administrative Fines: Enforcement actions, which assess monetary penalties for noncompliance.

Administrative Orders: Enforcement documents, which direct Users to undertake or cease, specified activities. Administrative orders may incorporate compliance schedules, time frames, administrative penalties, and termination of service orders. Administrative orders may include:

- *Finding of Noncompliance* – a written notice instructing the User to identify and correct causes of noncompliance.
- *Consent Order* – documents noncompliance and includes actions required to be accomplished by specific dates. Consent orders are developed during compliance meetings and both parties agree to terms.
- *Compliance Order* – directs the User to achieve or restore compliance by a date specified in the order. A compliance order is often a stipulated agreement that may include a compliance schedule, the payment of monetary penalties, or cost recovery for and the imposition of fines when milestones are not met.
- *Cease and Desist Order* – directs a noncompliant User to cease illegal or unauthorized discharges immediately or to terminate discharge altogether.
- *Termination of Service or Permit Revocation:* a notice delivered to a User serving notification of the intent to revoke the User's wastewater discharge permit or the termination of service.

Authorized Inspector. A Source Control Inspector designated by the City of Richmond

Best Management Practices (BMPs). The schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in 40 CFR Part 403.5(a)(1) and (b). 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.

Bypass. The intentional diversion of wastestreams from any portion of a User's treatment facility.

Categorical Industrial User. Any User subject to a Categorical Pretreatment Standard or Categorical Standard.

Categorical Pretreatment Standard or Categorical Standards. Any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 USC Section 1317) that apply to a specific category of Users and that appear in 40 CFR, Chapter I, Subchapter N, Parts 405-471.

Civil Action: An order, hearing or other action by the presiding court. Such orders may include penalties.

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Compliance Inspection: An inspection to determine compliance status and to identify practices, which may lead to noncompliance. Compliance inspections are normally not scheduled.

Compliance Meeting: A meeting between the City and User to discuss the causes of noncompliance, corrective actions to achieve compliance, and time frames for implementation of corrective actions.

Compliance Schedule: A timetable for the implementation of corrective actions by a User in order to achieve consistent compliance.

Consistent Compliance: No more than one parameter in violation and that value was less than twice the most stringent limit. Additionally, within forty-five (45) days of the User having been notified of the violation, the User has identified and corrected the cause of the violation and verified this through testing for that parameter.

Control Authority: The entity directly administering and enforcing Pretreatment Standards and Requirements against Users. The City of Richmond is the control authority for the City of Richmond Source Control Program.

Conventional Pollutant: Any of the pollutants listed in 40 CFR 401.16 "Conventional Pollutants". This section lists five conventional pollutants: biochemical oxygen demand (BOD), total suspended solids (TSS), pH, fecal coliform, and oil and grease.

Criminal Action: Similar to civil action, but the charges are for criminal neglect that may include fines and/or penalties.

Domestic Wastewater: 1) wastewater from normal residential activities including, but not limited to, wastewater from kitchens, bath and laundry facilities, or 2) wastewater from personal sanitary conveniences (toilets, showers, bathtubs, fountains, non-commercial sinks, and similar structures) of commercial, industrial, or institutional buildings, provided that the wastewater exhibits characteristics that are similar to those of wastewater from normal residential activities. Specifically excluded from this definition is wastewater from commercial, industrial, or institutional laundries or food preparation facilities.

Fines: Monetary penalties imposed by the court or by the City for violation of discharge regulations.

Good Faith Effort: Prompt and vigorous pollution control measures undertaken by the User which show that extraordinary efforts have been made to achieve compliance. Good faith may also be defined as the User's honest intention to remedy its noncompliance coupled with actions, which give support to this intention. (See USEPA's *Guidance for Developing Control Authority Enforcement Response Plans* 4.1.6.)

Inconsistent Compliance: Any one parameter that exceeded twice the most stringent limit and when re-sampled within thirty (30) days of the date the User is notified of the

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violation, it is found to be in compliance and does not fall within the significant noncompliance classification.

Industrial User: Any non-domestic or non-commercial user that discharges industrial wastes to the sanitary sewer system.

Interference: A discharge, which alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the WPCP, its treatment processes or operations, or its sludge processes, use, or disposal; and
- Therefore is a cause of a violation of any requirement of the WPCP'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 (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 Toxics Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limit. Specific discharge limits developed and enforced by the City upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR Part 403.5(a)(1) and (b). Local limits are included in Section 12.18.020.4 of the Sewer Use Ordinance.

National Pollutant Discharge Elimination System (NPDES) Permit. A permit issued pursuant of Section 402 of the Act, as amended (33 USC Section 1251 et seq.), which regulates discharges from the WPCP to a Water of the United States.

Non-Domestic User: A User that does not discharge domestic waste to the City sewer system.

Notice of Violation (NOV): An official notice that a violation of discharge regulations has occurred. A written response to the NOV identifying causes of the violation and corrective actions taken to prevent recurring violations is required within fourteen (14) days of the mailing date.

Pass Through. A discharge which exits the POTW into waters of the United States 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 City's NPDES permit, including an increase in the magnitude or duration of a violation.

Permittee. A User that is permitted by the City with a wastewater discharge permit.

Pretreatment Requirements. Any substantive or procedural requirement related to pretreatment imposed on a User, other than a Pretreatment Standard.

Pretreatment Standards or Standards. Pretreatment Standards shall mean prohibited discharge standards, Categorical Pretreatment Standards, and Local Limits.

Process Wastewater. Any water, which during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product from any industrial, commercial, institutional, or agricultural source.

Significant Industrial User (SIU):

- An Industrial User subject to Categorical Pretreatment Standards; or
- An Industrial User that:
 - Discharges an average of twenty-five thousand (25,000) gallons per day (gpd) or more of process wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater);
 - Contributes a process wastestream which makes up five percent (5%) or more of the average dry weather hydraulic or organic capacity of the POTW; or
 - Is designated as such by the City on the basis that it has reasonable potential for adversely affecting the WPCP operation or for violating any Pretreatment Standard or Requirement.

Significant Noncompliance (SNC): Significant noncompliance (as defined in 40 CFR Part 403 8(f)(2)(vii)), is a compliance status in which one or more of the following is found:

- Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken during a six- (6-) month period exceed (by any magnitude) the daily maximum limit or the average limit for the sample parameter.
- Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all the measurements for each parameter taken during a six- (6-) month period equal or exceed the product of the daily maximum or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Control Authority determines has caused, alone or in combination with other Users, interference or pass through (including endangering the health of WPCP personnel or the general public).
- Any discharge of a parameter that has caused imminent endangerment to human health, welfare, or to the environment or has resulted in the WPCP's exercise of

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its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.

- Failure to meet, within ninety days after the due date, required reports such as baseline monitoring reports, ninety day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which the City determines, will adversely affect the operation or implementation of the Source Control Program.
- When any action by a User meets one or more of the criteria for SNC, the User shall be designated as SNC, and reported in the Semiannual and Annual Pretreatment Reports, and published in the local newspaper annually.

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 12.18.020.1 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 City's regulations or local limits or the User's wastewater discharge permit conditions.

Source Control Coordinator: The person, designated by the City, who is in charge of certain duties and responsibilities of the Source Control Program.

Toxic Pollutant: Any of the pollutants listed in 40 CFR 401.15 "Toxic Pollutants". This section lists sixty-five (65) pollutants and their compounds as toxic pollutants.

United States Code (USC). The codification by subject matter of the general and permanent laws of the United States.

User: A source of wastewater discharge to the WPCP.

Letter of Warning: A warning communicated to a User in writing. The violation is usually slight or within the range of analytical error.

Wastewater Discharge Permit. A permit issued to a non-domestic User that allows it to discharge wastewater to the WPCP.

G-1 Local Limits Letter – dated December 23, 2013



December 20, 2013

Mr. Michael Chee
Water Resources Control Engineer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: City of Richmond Local Limits Evaluation

Dear Mr. Chee,

Introduction

The City of Richmond (City) and the Richmond Municipal Sewer District No. 1 (RMSD) own and operate the Richmond Municipal Sewer District Water Pollution Control Plant (Plant), which treats domestic, commercial, and industrial wastewater from most of the incorporated area of the City. The Plant is a secondary-level treatment facility that has an average dry weather design capacity of 16 million gallons per day (MGD) and a hydraulic wet weather capacity of 20 MGD. Final effluent from the Plant is combined with final effluent from West County Wastewater District (WCWD) prior to discharge into Central San Francisco Bay through a common outfall.

The discharge to Central San Francisco Bay is regulated by a National Pollutant Discharge Elimination System (NPDES) permit (CA0038539, Order No. R2-2013-0016) (2013 NPDES permit), which was adopted by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) in May 2013. The common outfall is operated by the West County Agency (WCA), which is a Joint Powers Authority whose members consist of the City, RMSD, and WCWD. As part of its NPDES permit (Provision VI.C.4.a.(1)(d)), the City is required to conduct an evaluation within 180 days of the effective date of the NPDES permit to determine if there is a need to revise its local limits under 40 CFR Part 403.5(c)(1). This letter will serve as the City's local limits evaluation to meet the requirement of the NPDES permit.

Local Limits Background

The prior NPDES permit (Order No. R2-2008-0003) (2008 NPDES permit) also required that the City conduct a local limits evaluation. In September 2008, the City conducted the local limits evaluation (2008 Local Limits Evaluation) and submitted a report to the Regional Water Board. Based on 2008 Local Limits Evaluation, the City determined that it would conduct a local limits study to update all its existing local limits and contracted with Larry Walker Associates (LWA) for this effort. LWA prepared a Local Limits Sampling Plan and conducted local limits sampling in November 2009.

In March 2010, LWA prepared a draft Local Limits Report that the City submitted to the Regional Water Board for comments. The Regional Water Board, through its contractor, PG Environmental LLC, provided comments to the City on the draft Local Limits Report in April 2011. The City provided a response to comments and a final Local Limits Report to the Regional Water Board in June 2011 (2011 Local Limits Report). The City adopted and began implementing these local limits in July 2011.

On behalf of the Regional Water Board, PG Environmental LLC conducted a Pretreatment Compliance Audit (PCA) of the City of Richmond Pretreatment Program on December 3-4, 2012. The PCA Summary Report, dated April 2, 2013, did not find issues with the current local limits.

Local Limits Evaluation

Conditions that typically create a need to update local limits include the following:

- Significant changes in the City's industrial base;
- Significant changes in discharge characteristics of existing industries;
- Significant changes in environmental and/or NPDES permit regulations applicable to the City;
- Future facility operational difficulties, discharge compliance difficulties, or biosolids disposal compliance difficulties from any pollutants known or suspected to be significantly contributed from industrial 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.

Of the conditions listed above, the only condition that could potentially warrant an update of the City of Richmond local limits is the adoption of a new NPDES permit in 2013, which included modifications to effluent limitations. A comparison of effluent limitations in the 2008 and 2013 NPDES permits is presented in Table 1.

Table 1. Comparison of Effluent Limitations in the Prior and Current West County Agency NPDES Permits

Constituent	Prior NPDES Permit Effluent Limitations			Current NPDES Permit Effluent Limitations		
	Average Monthly	Average Weekly	Maximum Daily	Average Monthly	Average Weekly	Maximum Daily
Biochemical Oxygen Demand (mg/L)	30	45	--	30	45	--
Total Suspended Solids (mg/L)	30	45	--	30	45	--
Oil and Grease (mg/L)	10	--	20	10	--	20
Total Ammonia (mg/L as N)	32	--	59	32	--	59
Copper (µg/L)	53	--	76	44	--	76
Mercury (µg/L) ⁽¹⁾	0.066 ⁽¹⁾	0.072 ⁽¹⁾	--	0.066 ⁽²⁾	0.072 ⁽²⁾	--
Nickel (µg/L)	34	--	59	34	--	59
Selenium (µg/L)	3.8	--	8.9	--	--	--
Cyanide (µg/L)	21	--	41	19	--	41
Bis(2-ethylhexyl) phthalate (µg/L)	55	--	150	55	--	150
Dioxin TEQ (µg/L)	1.4 x 10 ⁻⁸	--	2.8 x 10 ⁻⁸	1.4 x 10 ⁻⁸	--	2.8 x 10 ⁻⁸
4,4'-DDD (µg/L)	0.00084	--	0.0017	--	--	--
Endrin (µg/L)				0.019	--	0.037
Heptachlor (µg/L)	0.0020	--	0.0041	0.0019	--	0.0039
PCBs (µg/L)	--	--	--	0.012 ⁽²⁾	--	0.017 ⁽²⁾

(1) Effluent limitations for mercury are from the *Waste Discharge Requirements for Municipal and Industrial Wastewater Discharges of Mercury to San Francisco Bay* (NPDES No. CA0038849, Order No. R2-2007-0077).

(2) Effluent limitations for mercury and PCBs are from the *Waste Discharge Requirements for Mercury and PCBs from Municipal and Industrial Wastewater Discharges to San Francisco Bay* (NPDES No. CA0038849, Order No. R2-2012-0096).

The constituents with effluent limitations (in either the 2008 or 2013 NPDES permits) and constituents for which the City currently has local limits are presented in Table 2 along with justification for whether or not the current local limits need to be updated.

Table 2. City of Richmond Constituents of Concern and Current Local Limits

Constituent	Current Local Limit (mg/L) ⁽¹⁾	Need to Update Local Limit?
4,4'-DDD	--	No. In the 2011 Local Limits Report, it was determined that a local limit was not required because the constituent was not detected during sampling. The constituent does not currently have NPDES permit effluent limitations so there are no environmental or operational restrictions to drive the derivation of a local limit.
Ammonia as N	160 ⁽²⁾	No. The NPDES permit effluent limitations, which were used to derive the current local limit, have not changed.
Arsenic (total recoverable)	0.11	No. The NPDES permit does not affect the current local limit for this constituent.
Benzene	1.0	No. However, the 2011 Local Limits Report recommended removing the current local limit for this constituent.
Biochemical Oxygen Demand	220	No. The NPDES permit effluent limitations have not changed. Plant design capacity is the factor driving the current local limit.
Bis(2-ethylhexyl) phthalate	--	No. The NPDES permit effluent limitations have not changed. The 2011 Local Limits Report determined that influent loads for this constituent are low compared to the maximum allowable headworks loading and a local limit for this constituent is not necessary.
Cadmium (total recoverable)	0.05	No. The NPDES permit does not affect the current local limit for this constituent.
Chromium (total recoverable)	0.27	No. The NPDES permit does not affect the current local limit for this constituent.
Chloroform	1.37	No. The 2011 Local Limits Report determined that influent loads for this constituent are low compared to the maximum allowable headworks loading and a local limit for this constituent is not necessary.
Copper (total recoverable)	0.65	No. Although the 2013 NPDES permit effluent limitations have decreased compared to the 2008 NPDES permit effluent limitations, anaerobic digestion inhibition is still the limiting factor driving the current local limit.
Cyanide (total)	0.29	Yes. The current local limit is based on the 2008 NPDES permit monthly average effluent limitations, which decreased in the 2013 NPDES permit. Based on the existing factors from the 2011 Local Limits Report, the cyanide local limit will need to be decreased to 0.26 mg/L.
Dioxin TEQ	--	No. The primary source for dioxin TEQ is air deposition, which is not controllable by either the City or its industrial users. A local limit for this constituent is not necessary.
Endrin	--	No. This constituent was banned for production and use by USEPA in 1986. A local limit for this

Constituent	Current Local Limit (mg/L) ⁽¹⁾	Need to Update Local Limit?
		constituent is not necessary.
Heptachlor	-	No. This constituent was banned for use by USEPA in 1988 with the exception of commercial application for fire ant control in power transformers. A local limit for this constituent is not necessary.
Lead (total recoverable)	0.3	No. The NPDES permit does not affect the current local limit for this constituent.
Mercury (total)	0.005	No. The NPDES permit effluent limitations have not changed. Biosolids handling is the factor driving the current local limit.
Nickel (total recoverable)	0.27	No. The NPDES permit effluent limitations, which were used to derive the current local limit, have not changed.
Oil and Grease (total)	90	No. The NPDES permit effluent limitations, which were used to derive the current local limit, have not changed.
PCBs	-	No. These constituents have not been detected in the influent. Local limits for these constituents are not necessary.
Selenium (total recoverable)	0.030	No. This constituent does not currently have NPDES permit effluent limitations. The current local limit is based on the 2008 NPDES permit effluent limitations. If the local limit for this constituent is updated, it will likely increase.
Silver (total recoverable)	0.25	No. This constituent does not currently have NPDES permit effluent limitations.
Sulfide (total as S)	0.35	No. This constituent does not currently have NPDES permit effluent limitations.
Tetrachloroethylene	1.0	No. However, the 2011 Local Limits Report recommended removing the current local limit for this constituent.
Toluene	1.0	No. However, the 2011 Local Limits Report recommended removing the current local limit for this constituent.
Total Suspended Solids	430	No. The NPDES permit effluent limitations have not changed. Plant design capacity is the factor driving the current local limit.
Tributyltin	0.004	No. However, the 2011 Local Limits Report recommended removing the current local limit for this constituent.
Xylene	1.0	No. However, the 2011 Local Limits Report recommended removing the current local limit for this constituent.
Zinc (total recoverable)	1.0	No. This constituent does not currently have NPDES permit effluent limitations.

- (1) Current local limits are maximum daily concentrations.
- (2) The local limit for West County Landfill leachate is 100 pounds per day. The local limit for all other industrial users is 160 mg/L.

The City has consistently complied with the effluent limitations in the NPDES permit, and the Plant has not experienced process upset or inhibition. Based on the information presented in this letter, the City has determined that it is only necessary to update its local limit for Cyanide, which should be reduced to 0.26 mg/L from the current local limit of 0.29 mg/L. The reduction in the local limit for Cyanide is due to a small reduction in the monthly average effluent limitation in the 2013 NPDES permit when compared to the 2008 NPDES permit.

Local limits are part of a dynamic process that includes periodic review and update as necessary. Future circumstances may create a need to update the City's local limits. The City will continue to implement its current local limits and periodically evaluate the need to update these local limits.

If you have any questions or need further information, please feel free to contact me at 510-620-5486.

Respectfully,



Chad Davison
General Manager, Richmond Municipal Sewer District

Copies: Amelia Whitson, USEPA Region IX
Mary Phelps, City of Richmond
Stephen Linsley, West County Wastewater District
Gorman Lau, Larry Walker Associates

I-1 BMR Checklist

Appendix I-1

City of Richmond
 Industrial Pretreatment Program
 450 Civic Center Plaza
 Richmond, CA 94804

BMR Checklist (to be compiled in your report)

	<u>Requirements</u>	<u>Reference</u>	<u>Completed</u>
1.	Name and address of facility Name of the operator and owners	(40CFR403.12(b)(1))	_____
2.	List of environmental control permits	(40CFR403.12(b)(2))	_____
3.	Brief description of operations, including average rate of production Schematic of process diagram	(40CFR403.12(b)(3))	_____
	(a) All regulated processes		_____
	(b) All points of discharge to sanitary sewer		_____
	(c) All sampling locations used		_____
4.	Flow Measurement (avg. And max. daily)	(40CFR403.12(b)(4))	_____
	(a) From regulated process streams	(40CFR405-471)	_____
	(b) From all other process streams	(40CFR403.6(e))	_____
	(c) Method of flow measurement		_____
5.	Measurement of pollutants	(40CFR403.12(b)(5))	_____
	(a) Identify applicable Pretreatment Standards		_____
	(b) Sampling and Analysis		_____
	(1) Sampling representative of daily operations		_____
	(2) 24 hour composite sample obtained or grab sample approved		_____
	(3) Laboratory data sheets submitted		_____
	(4) State certified laboratory used		_____
	(c) Total Toxic Organics non-use statement (Enclosed)		_____
6.	Certification statement (Enclosed)	(40CFR403.12(b)(6))	_____
7.	Compliance schedule, if sample/s not in limits stated in City of Richmond Industrial Discharge Permit	(40CFR403.12(b)(7))	_____

ORDINANCE NO. 18-11 N.S.

**AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF RICHMOND
AMENDING CHAPTER 12.18 OF ARTICLE XII OF THE RICHMOND MUNICIPAL
CODE RELATING TO THE DISCHARGES TO THE WASTEWATER TREATMENT
SYSTEM WITHIN THE CITY OF RICHMOND**

The Council of the City of Richmond does ordain as follows:

Section I. **Amendment of Chapter 12.18.** Chapter 12.18 of the
Richmond Municipal Code is hereby amended to read as
follows:

Chapter 12.18

Discharges to the Wastewater Treatment System

Section 12.18.010	General Provisions
Section 12.18.010.1	Purpose and Policy
Section 12.18.010.2	Administration
Section 12.18.010.3	Definitions
Section 12.18.020	General Sewer Use Requirements
Section 12.18.020.1	Prohibited Discharge Standards
Section 12.18.020.2	National Categorical Pretreatment Standards
Section 12.18.020.3	State Pretreatment Standards
Section 12.18.020.4	Local Limits
Section 12.18.020.5	Right to Revision
Section 12.18.020.6	Dilution
Section 12.18.030	Pretreatment of Wastewater
Section 12.18.030.1	Pretreatment Facilities
Section 12.18.030.2	Fats, Oils, and Grease
Section 12.18.030.3	Additional Pretreatment Measures
Section 12.18.030.4	Accidental Discharge/Slug Discharge Control Plan
Section 12.18.030.5	Hauled Wastewater
Section 12.18.040	Wastewater Discharge Permits
Section 12.18.040.1	Wastewater Analysis
Section 12.18.040.2	Wastewater Discharge Permit Requirement
Section 12.18.040.3	Wastewater Discharge Permitting: Existing Connections
Section 12.18.040.4	Wastewater Discharge Permitting: New Connections
Section 12.18.040.5	Wastewater Discharge Permit Application Contents
Section 12.18.040.6	Wastewater Discharge Permitting: General Permits
Section 12.18.040.7	Application Signatories and Certifications
Section 12.18.040.8	Wastewater Discharge Permit Decisions
Section 12.18.050	Wastewater Discharge Permit Issuance
Section 12.18.050.1	Wastewater Discharge Permit Duration
Section 12.18.050.2	Wastewater Discharge Permit Contents
Section 12.18.050.3	Permit Appeals
Section 12.18.050.4	Permit Modification
Section 12.18.050.5	Wastewater Discharge Permit Transfer
Section 12.18.050.6	Wastewater Discharge Permit Revocation
Section 12.18.050.7	Wastewater Discharge Permit Reissuance
Section 12.18.050.8	Regulation of Waste Received from Other Jurisdictions
Section 12.18.060	Reporting Requirements
Section 12.18.060.1	Baseline Monitoring Reports
Section 12.18.060.2	Compliance Schedule Progress Reports
Section 12.18.060.3	Reports on Compliance with Categorical Pretreatment Standard Deadline
Section 12.18.060.4	Periodic Compliance Reports
Section 12.18.060.5	Reports of Changed Conditions
Section 12.18.060.6	Reports of Potential Problems
Section 12.18.060.7	Reports from Unpermitted Users
Section 12.18.060.8	Notice of Violation/Repeat Sampling and Reporting
Section 12.18.060.9	Notification of the Discharge of Hazardous Waste

Section 12.18.060.10	Analytical Requirements
Section 12.18.060.11	Sample Collection
Section 12.18.060.12	Date of Receipt of Reports
Section 12.18.060.13	Recordkeeping
Section 12.18.060.14	Certification Statements
Section 12.18.070	Compliance Monitoring
Section 12.18.070.1	Right of Entry: Inspection and Sampling
Section 12.18.070.2	Search Warrants
Section 12.18.080	Confidential Information
Section 12.18.090	Publication of Users in Significant Noncompliance
Section 12.18.100	Administrative Enforcement Remedies
Section 12.18.100.1	Notification of Violation
Section 12.18.100.2	Consent Orders
Section 12.18.100.3	Show Cause Hearing
Section 12.18.100.4	Compliance Orders
Section 12.18.100.5	Cease and Desist Orders
Section 12.18.100.6	Administrative Fines
Section 12.18.100.7	Emergency Suspension
Section 12.18.100.8	Termination of Discharge
Section 12.18.110	Judicial Enforcement Remedies
Section 12.18.110.1	Injunctive Relief
Section 12.18.110.2	Civil Penalties
Section 12.18.110.3	Criminal Prosecution
Section 12.18.110.4	Remedies Nonexclusive
Section 12.18.120	Supplemental Enforcement Action
Section 12.18.120.1	Penalties for Late Reports
Section 12.18.120.2	Performance Bonds
Section 12.18.120.3	Liability Insurance
Section 12.18.120.4	Payment of Outstanding Fees and Penalties
Section 12.18.120.5	Water Supply Severance
Section 12.18.120.6	Public Nuisances
Section 12.18.120.7	Contractor Listing
Section 12.18.130	Affirmative Defenses to Discharge Violations
Section 12.18.130.1	Upset
Section 12.18.130.2	Prohibited Discharge Standards
Section 12.18.130.3	Bypass
Section 12.18.140	Wastewater Treatment Rates
Section 12.18.140.1	Fees and Charges

SECTION 12.18.010 – GENERAL PROVISIONS

Section 12.18.010.1 – Purpose and Policy

This ordinance sets forth the requirements of Users of the Richmond Municipal Sewer District Water Pollution Control Plant and its collection system (collectively, called the WPCP in this ordinance) for the City of Richmond (City), and enables the City to comply with all applicable State and Federal laws, including the Clean Water Act (Title 33 of the United States Code [USC] Section 1251 et seq.) and the General Pretreatment Regulations (Title 40 of the Code of Federal Regulations [CFR] Part 403). The objectives of this ordinance are:

- A. To prevent the introduction of pollutants into the WPCP that will interfere with its operations;
- B. To prevent the introduction of pollutants into the WPCP that will pass through the WPCP, inadequately treated, into receiving waters or atmosphere, or otherwise be incompatible with the WPCP;
- C. To protect both WPCP personnel who may be affected by wastewater and sludge in the course of their employment and the general public;
- D. To promote reuse and recycling of wastewater, sludge, gases, and other byproducts from the WPCP;

- E. To provide for fees for the equitable distribution of the cost of operation, maintenance, and improvement of the WPCP;
- F. To prevent sanitary sewage overflows as a result of grease obstructions that subject the City and the public to adverse health risks, State Water Resources Control Board penalties, and civil lawsuits, impact service continuance, and diminish storm water quality;
- G. To comply with San Francisco Bay Regional Water Quality Control Board regulations for establishing a Sanitary Sewer Overflow Plan that also includes a Fats, Oils, and Grease Control Plan.
- H. To enable the City 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 WPCP is subject.

This ordinance shall apply to all Users of the WPCP. The ordinance authorizes the issuance of individual and general wastewater discharge permits; provides for monitoring, compliance, and enforcement activities; establishes administrative review procedures; requires User reporting; and provides for the setting of fees for equitable distribution of costs resulting from the program established herein.

Section 12.18.010.2 – Administration

Except as otherwise provided herein, the City Engineer shall administer, implement, and enforce the provisions of this ordinance. Any powers granted to or duties imposed upon the City Engineer may be delegated by the City Engineer to a duly authorized City employee.

Section 12.18.010.3 – 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 Section 1251 et seq.
- B. **Administrator.** The EPA Administrator or their designee.
- C. **Applicant.** Any person who applies for an individual or coverage under a wastewater discharge permit.
- D. **Approval Authority.** The San Francisco Bay Regional Water Quality Control Board.
- E. **Authorized or Duly Authorized Representative of the User.**
 - (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 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 government facility: a director or highest official appointed or designated to oversee the operations and performance of the activities of the government facility, or their designee.
 - (4) The individuals described in subdivisions (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 facility. This authorization must be made in writing by the principal executive officer or ranking elected official, and submitted to the City prior to or together with any document being submitted.
- F. **Authorized Inspector.** An inspector designated by the City Engineer.
 - G. **Beneficial Uses.** Any and all use of the waters of the State that are protected against quality degradation, including but not limited to domestic, municipal, and agricultural use, use for industrial supply, power generation, recreation, aesthetic enjoyment, or navigation, use for the preservation and enhancement of fish, wildlife and other aquatic resources or reserves, and other beneficial uses, tangible and intangible, as specified by Federal or State law or other applicable regulations.
 - H. **Best Management Practices (BMPs).** The schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in 40 CFR Part 403.5(a)(1) and (b). 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.
 - I. **Biochemical Oxygen Demand (BOD).** The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures for five (5) days at 20 degrees centigrade, usually expressed as a concentration in milligrams per liter (mg/L).
 - J. **Bypass.** The intentional diversion of wastestreams from any portion of a User's treatment facility.
 - K. **California Code of Regulations (CCR).** The publication of the State of California government containing finalized State regulations.
 - L. **Categorical Industrial User.** Any User subject to a Categorical Pretreatment Standard or Categorical Standard.
 - M. **Categorical Pretreatment Standard or Categorical Standards.** Any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 USC Section 1317) that apply to a specific category of Users and that appear in 40 CFR, Chapter I, Subchapter N, Parts 405-471.
 - N. **Chemical Oxygen Demand.** A measure of the oxygen required to oxidize all compounds, both organic and inorganic, in water.
 - O. **City.** City of Richmond.
 - P. **City Engineer.** The person, designated by the City, who is in charge with certain duties and responsibilities by this ordinance. The term also means a Duly Authorized Representative of the City Engineer.
 - Q. **Code of Federal Regulations (CFR).** The publication of the United States government that contains finalized Federal regulations.
 - R. **Commercial Garbage/Food Grinder.** A mechanical unit for pulverizing wastes before discharging into the public sewer system by a Commercial User.
 - S. **Commercial User.** Any source of wastewater discharge originating from a commercial business.
 - T. **Cooling Water.** Water discharges from any use such as air conditioning, cooling, or refrigeration, or to which the only pollutant added is heat.

- U. **Daily Maximum.** The arithmetic average of all effluent samples for a pollutant collected during a calendar day.
- V. **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 concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- W. **Environmental Protection Agency (EPA).** The Regional Water Management Division Director, the Regional Administrator, or other duly authorized official of said agency.
- X. **Existing Source.** Any source of discharge that is not a "new source".
- Y. **Fats, Oils, and Grease (FOG).** Any organic polar compound derived from animal and/or plant sources that contain multiple carbon chain triglyceride molecules.
- Z. **Food Handling Facility (FHF).** Any facility that prepares and/or serves food for commercial use or sale. This includes, but is not limited to, restaurants, cafes, lunch counters, cafeterias, hotels, hospitals, convalescent homes, factory or school kitchens, catering kitchens, bakeries, grocery stores with food preparation and packaging, meat cutting and preparation (excluding grocery stores with only food warming operations), meat packing facilities, and other food handling facilities not listed above where FOG may be introduced to the sewer system and cause line blockages and sewer overflows. This is a process of concern for the City.
- AA. **Grab Sample.** A sample that is taken from a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes.
- AB. **Grease Collection Service.** A qualified company that specializes in cleaning grease interceptors and/or hauling grease to an approved waste site.
- AC. **Grease Separators,** or sometimes called separators. A multi-compartment device designed to retain grease from one or more fixtures. It shall be designed outside of the food establishment and shall be of a size and design in compliance with all current Building and Plumbing Codes adopted by the City.
- AD. **Grease Trap.** A device designed to retain grease from one to a maximum of four fixtures.
- AE. **Industrial User.** Any source of industrial wastewater discharge.
- AF. **Industrial Wastewater.** All water-carried wastes, excluding domestic and commercial wastewater, resulting from the processing or manufacture of goods or products.
- AG. **Instantaneous Limit.** The maximum concentration of a pollutant allowed to be discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
- AH. **Interference.** A discharge, that alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the WPCP, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of a violation of the City's NPDES permit or the prevention of sewage sludge use or disposal in compliance with any of the following statutory/regulatory provisions or permits issued thereunder, or any more stringent State or local regulations: Section 405 of the Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; and the Marine Protection, Research, and Sanctuaries Act.

- AI. **Lateral.** A sewer pipeline conveying wastewater from the premises of a User to the City's sewer system. The term "lateral" includes "building sewer" and "service lateral".
- AJ. **Lift Station.** A sump used to allow sewage to accumulate to a level where it is pumped to the sewer system at a higher elevation.
- AK. **Local Limit.** Specific discharge limits developed and enforced by the City upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR Part 403.5(a)(1) and (b).
- AL. **Medical Waste.** Isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- AM. **Monthly Average.** The sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharge" measured during that month.
- AN. **Monthly Average Limit.** The highest allowable average of the "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.
- AO. **National Pollutant Discharge Elimination System (NPDES) Permit.** A permit issued pursuant of Section 402 of the Act, as amended (33 USC Section 1251 et seq.), which regulates discharges from the WPCP to a Water of the United States.
- AP. **National Pretreatment Standard.** The term *National Pretreatment Standard*, *Pretreatment Standard*, or *Standard* means any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307 (b) and (c) of the Act, which applies to Industrial Users. This term includes prohibitive discharge limits.
- AQ. **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 the 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 is 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 structurally independent from 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, should be considered.
 - (2) Construction on a site at which an Existing Source is located results in a modification rather than a Anew Source if the construction does not create a new building, structure, 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 begin, as part of a continuous on-site 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.
- AR. **Nuisance.** Anything which is injurious to health or is indecent or offensive to the senses or an obstruction to the free use of property so as to interfere with the comfort or enjoyment of life or property or which affects at the same time an entire community or neighborhood or any considerable number of Persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- AS. **Pass Through.** A discharge which exits the WPCP into Waters of the United States 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 City's NPDES permit, including an increase in the magnitude or duration of a violation.
- AT. **Permittee.** A User that is permitted by the City with a wastewater discharge permit.
- AU. **Person.** Any individual, partnership, copartnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity, or any other legal entity; or their legal representatives, agents, or assigns. This definition includes all Federal, State, and local governmental entities.
- AV. **pH.** A measure of acidity or alkalinity of a solution, expressed in standard units.
- AW. **Pollutant.** Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, municipal, agricultural and industrial wastes, and certain characteristics of wastewater (e.g., pH, temperature, TSS, turbidity, color, BOD, COD, toxicity, or odor).
- AX. **Premises.** Any land, including any improvements or structures thereon, which is owned, used, occupied, leased or operated by a User and from or on which discharges occur or wastewater is created.
- AY. **Pretreatment.** The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of, introducing such pollutants into the WPCP. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable Pretreatment Standard.
- AZ. **Pretreatment Requirements.** Any substantive or procedural requirement related to pretreatment imposed on a User, other than a Pretreatment Standard.
- BA. **Pretreatment Standards or Standards.** Pretreatment Standards shall mean prohibited discharge standards, Categorical Pretreatment Standards, and Local Limits.
- BB. **Process of Concern.** For the purpose of the City's FOG Control Program, this means any business that has FOG on-site or generally any business process that introduces material or matter into wastewater.
- BC. **Process Wastewater.** Any water, which during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product from any industrial, commercial, institutional, or agricultural source.

- BD. Prohibited Discharge Standards or Prohibited Discharges.** Absolute prohibitions against the discharge of certain substances; these prohibitions appear in Section 12.18.020.1 of this ordinance.
- BE. Publicly Owned Treatment Works (POTW).** A treatment works, as defined by Section 212 of the Act (33 USC Section 1292), which is owned by the City. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances, which convey wastewater to a treatment plant. In this ordinance, the POTW is the Richmond Municipal Sewer District Water Pollution Control Plant and its collection system.
- BF. Septic Tank Waste.** Any sewage from holding tanks such as vessels, chemical toilets, campers, trailers, and septic tanks.
- BG. Sewage.** Human excrement and gray water (household showers, dishwashing operations, etc.).
- BH. 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) An Industrial User that:
 - (a) Discharges an average of twenty-five thousand (25,000) gallons per day (gpd) or more of process wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater);
 - (b) Contributes a process wastestream which makes up five percent (5%) or more of the average dry weather hydraulic or organic capacity of the WPCP; or
 - (c) Is designated as such by the City on the basis that it has reasonable potential for adversely affecting WPCP operation or for violating any Pretreatment Standard or Requirement.
 - (3) The City may determine that an Industrial User subject to Categorical Pretreatment Standards is a Non-Significant Categorical Industrial User 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, non-contact 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 City'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 12.18.060.14(B) (see 40 CFR Part 403.12(q)) of this ordinance, 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 criterion in Section 12.18.010.3(BH)(2) of this ordinance has no reasonable potential for adversely affecting WPCP operation or for violating any Pretreatment Standard or Requirement, the City 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 403.8(f)(6), determine that such User should not be considered an SIU.
- BI. Significant Noncompliance (SNC).** Any action of conduct by a User which constitutes a violation of any applicable regulation and which consists of one or more of the following:

- (1) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR Part 403.3(l);
 - (2) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six- (6-) month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR Part 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH).
 - (3) Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR Part 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the City determines has caused, alone or in combination with other discharges, interference, or pass through (including endangering the health of City personnel or the general public).
 - (4) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the City's exercise of its emergency authority to halt or prevent such a discharge.
 - (5) Failure to meet, within ninety (90) days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
 - (6) Failure to provide, within forty-five (45) days after the due date, required reports such as baseline monitoring reports, ninety- (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 or group of violations, which may include a violation of BMPs, which the City determines will adversely affect the operation or implementation of its Pretreatment Program.
- BJ. **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 12.18.020.1 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 City's regulations or local limits or the User's wastewater discharge permit conditions.
- BK. **Standard Industrial Classification (SIC).** The system of classifying industries as identified in the *Standard Industrial Classification Manual* (1972), Office of Management and Budget and as may be amended.
- BL. **Standard Specifications.** The document entitled, *Standard Specifications for Sewer Construction*, which includes the specifications and drawings to be used in design and construction of laterals and sewers.
- BM. **State.** The State of California, including any department or agency thereof.
- BN. **Storm Water.** Any flow occurring during or following any form of natural precipitation, and resulting from such precipitation, including snowmelt.
- BO. **Total Suspended Solids or Suspended Solids.** The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquid, and that is removable by laboratory filtering.
- BP. **United States Code (USC).** The codification by subject matter of the general and permanent laws of the United States.
- BQ. **User.** A source of wastewater discharge to the WPCP.

- BR. **Waste.** Sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation of whatever nature, including such waste placed within containers of whatever nature prior to, and for the purposes of, disposal.
- BS. **Wastewater.** Liquid and water-carried industrial wastes and sewage from residential dwelling, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the WPCP.
- BT. **Wastewater Discharge Permit.** A permit issued to a User that allows it to discharge wastewater to the WPCP.
- BU. **Water Softener.** A unit using an ion-exchange process requiring sodium chloride ion to regenerate the exchange bed.
- BV. **Waters of the State.** Any water, surface or underground, including saline waters within the boundaries of the State as defined in 40 CFR Part 230.3(s).

SECTION 12.18.020 – GENERAL SEWER USE REQUIREMENTS

Section 12.18.020.1 – Prohibited Discharge Standards

- A. General Prohibitions. No User shall introduce or cause to be introduced into the WPCP any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all Users of the WPCP whether or not they are subject to Categorical Pretreatment Standards or any other Federal, State, or local Pretreatment Standards or Requirements.
- B. Specific Prohibitions. No User shall introduce or cause to be introduced into the WPCP the following pollutants, substances, or wastewater:
- (1) Pollutants which create a fire or explosive hazard in the WPCP, including, but not limited to, 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*;
 - (2) Wastewater having a pH less than 6.0 or more than 10.0, or otherwise causing corrosive structural damage to the POTW or equipment;
 - (3) Solid or viscous substances, such as, but not limited to, grease, garbage with particles greater than one-half (0.5) inch in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshing, entrails, whole blood, feathers, ashes, cinders, sands, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud, glass grindings, or polishing wastes, in amounts which will cause obstruction of the flow in the WPCP resulting in interference;
 - (4) Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the WPCP;
 - (5) Wastewater having a temperature greater than 140 degrees F (60 degrees C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees F (40 degrees C);
 - (6) Petroleum oil, nonbiodegradable cutting oil, or products of mineral origin, in amounts that will cause interference or pass through;
 - (7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the WPCP in a quantity that may cause acute worker health and safety problems;
 - (8) Trucked or hauled pollutants, except at discharge points designated by the City Engineer in accordance with Section 12.18.030.5 of this ordinance;
 - (9) Noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
 - (10) Pollutants that impart color, which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions.
 - (11) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations;
 - (12) Storm water, surface water, groundwater, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized

water, non-contact cooling water, and unpolluted wastewater, unless specifically authorized by the City Engineer;

- (13) Sludges, screenings, or other residue from the pretreatment of industrial wastes;
- (14) Medical wastes, except as specifically authorized by the City Engineer in a wastewater discharge permit;
- (15) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test;
- (16) Detergents, surface-active agents, or other substances that might cause excessive foaming in the WPCP;
- (17) Wastewater causing two readings on an explosion hazard meter at the point of discharge into the sanitary sewer system, or at any point in the WPCP, of more than five percent (5%) as hexane or any single reading over ten percent (10%) of the Lower Explosive Limit (LEL) of the meter. LEL values may be found in the NIOSH *Pocket Guide to Chemical Hazards*. Prohibited materials include, but are not limited to, gasoline, kerosene, naphtha, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides.

Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such a manner that they could be discharged to the WPCP.

Section 12.18.020.2 – National Categorical Pretreatment Standards

Users must comply with the Categorical Pretreatment Standard found in 40 CFR Chapter 1, Subpart N, Parts 405-471.

- A. Where a Categorical Pretreatment Standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the City Engineer may impose equivalent concentration or mass limits in accordance with Sections 12.18.020.2(F)-(G).
- B. When the limits in a Categorical Pretreatment Standard are expressed only in terms of mass of pollutant per unit of production, the City Engineer may convert the limits to equivalent limitations expressed either as a mass of pollutant discharged per day or effluent concentration for the purposes of calculating effluent limitations applicable to individual Industrial Users.
- C. When wastewater subject to a Categorical Pretreatment Standard is mixed with wastewater not regulated by the same Standard, the City Engineer shall impose an alternate limit in accordance with 40 CFR Part 403.6(e).
- D. A CIU may obtain a net/gross adjustment to a Categorical Pretreatment Standard in accordance with the following paragraphs of this Section:
 - (1) Categorical Pretreatment Standards may be adjusted to reflect the presence in the Industrial User's intake water in accordance with this Section. Any Industrial User seeking to obtain credit for intake pollutants must make an application to the City. Upon request of the Industrial User, the applicable Standard will be calculated on a "net" basis (i.e., adjusted to reflect credit for pollutants in the intake water) if the requirements of Section 12.18.020.2(D)(2) are met.
- E. When a Categorical Pretreatment Standard is expressed only in terms of pollutant concentrations, an Industrial User may request that the City convert the limits to equivalent mass limits. The determination to convert concentration limits to mass limits is within the discretion of the City Engineer. The City may establish equivalent mass limits only if the Industrial User meets all the conditions set forth in Section 12.18.020.2(E)(1)(a)-(e).
 - (1) To be eligible for equivalent mass limits, the Industrial User must:

- (a) Employ, or demonstrate that it will employ, water conservation methods and technologies that substantially reduce water use during the term of its wastewater discharge permit;
 - (b) Currently use control and treatment technologies adequate to achieve compliance with the applicable Categorical Pretreatment Standard, and not have used dilution as a substitute of treatment;
 - (c) Provide sufficient information to establish the facility's actual average daily flow rates for all wastestreams, based on data from a continuous effluent flow monitoring device, as well as the facility's long-term average production rate. Both the actual average daily flow rate and the long-term average production rate must be representative of current operating conditions;
 - (d) Not have daily flow rates, production levels, or pollutant levels that vary so significantly that equivalent mass limits are not appropriate to control the discharge; and
 - (e) Have consistently complied with all applicable Categorical Pretreatment Standards during the period prior to the Industrial User's request for equivalent mass limits.
- (2) An Industrial User subject to equivalent mass limits must:
- (a) Maintain and effectively operate control and treatment technologies adequate to achieve compliance with the equivalent mass limits;
 - (b) Continue to record the facility's flow rates through the use of a continuous effluent flow monitoring device;
 - (c) Continue to record the facility's production rates and notify the City Engineer whenever production rates are expected to vary by more than twenty percent (20%) from its baseline production rates determined in Section 12.18.020.2(F) of this ordinance. Upon notification of a revised production rate, the City Engineer will reassess the equivalent mass limit and revise the limit as necessary to reflect changed conditions at the facility; and
 - (d) Continue to employ the same or comparable water conservation methods and technologies as those implemented pursuant to Section 12.18.020.2(E)(1)(a) of this ordinance so long as it discharges under an equivalent mass limit.
- (3) When developing equivalent mass limits, the City Engineer:
- (a) Will calculate the equivalent mass limit by multiplying the actual average daily flow rate of the regulated process(es) of the Industrial User by the concentration-based daily maximum and monthly average standard for the applicable Categorical Pretreatment Standard and the appropriate unit conversion factor.
 - (b) Upon notification of a revised production rate, will reassess the equivalent mass limit and recalculate the limit as necessary to reflect changed conditions at the facility; and
 - (c) May retain the same equivalent mass limit in subsequent wastewater discharge permits terms if the Industrial User's actual average daily flow rate was reduced solely as a result of the implementation of water conservation methods and technologies, and the actual average daily flow rates used in the original calculation of the equivalent mass limit were not based on the use of dilution as a substitute for treatment pursuant to Section 12.18.020.6 of this ordinance. The Industrial User must also be in compliance with Section 12.18.130.3 of this ordinance.

F. The City Engineer may convert the mass limits of the Categorical Pretreatment Standards of 40 CFR Parts 414, 419, and 455 to concentration limits for the

purposes of calculating limitations applicable to individual Industrial Users. The conversion is at the discretion of the City Engineer.

- G. Once included in its wastewater discharge permit, the Industrial User must comply with the equivalent limitations developed in this section in lieu of the promulgated Categorical Pretreatment Standards from which the equivalent limitations were derived.
- H. Many Categorical Pretreatment Standards specify one limit for calculating maximum daily discharge limitations and second limit for calculating maximum monthly average, or 4-day average, limitations. Where such Categorical Pretreatment Standards are being applied, the same production or flow figure shall be used in calculating both the average and maximum equivalent limitation.
- I. Any Industrial User operating under a wastewater discharge permit incorporating equivalent mass or concentration limits calculated from a production-based Categorical Pretreatment Standard shall notify the City Engineer within two (2) business days after the User has a reasonable basis to know that the production level will significantly change within the next calendar month. Any User not notifying the City Engineer of such anticipated change will be required to meet the mass or concentration limits in its wastewater discharge permit that were based on the original estimate of the long-term average production rate.

Section 12.18.020.3 – State Pretreatment Standards

Users must comply with all applicable State Pretreatment Standards.

Section 12.18.020.4 – Local Limits

- A. The City is authorized to establish local limits pursuant of 40 CFR Part 403.5(c).
- B. The following pollutant limits are established to protect against pass through and interference. No person shall discharge wastewater containing in excess of the following (daily maximum limit):

160 ⁽¹⁾	mg/L Ammonia as N
0.11	mg/L Arsenic (total recoverable)
1.0	mg/L Benzene
220	mg/L BOD ₅
0.05	mg/L Cadmium (total recoverable)
0.27	mg/L Chromium (total recoverable)
1.37	mg/L Chloroform
0.65	mg/L Copper (total recoverable)
0.29	mg/L Cyanide (total)
0.3	mg/L Lead (total recoverable)
0.005	mg/L Mercury (total)
0.27	mg/L Nickel (total recoverable)
90	mg/L Oil & Grease (total)
0.030	mg/L Selenium (total recoverable)
0.25	mg/L Silver (total recoverable)
0.35	mg/L Sulfide (total as S)
1.0	mg/L Tetrachloroethylene
1.0	mg/L Toluene
430	mg/L Total Suspended Solids
0.004	mg/L Tributyltin
1.0	mg/L Xylene

1.0 mg/L Zinc (total recoverable)

⁽¹⁾ The local limit for West County Landfill leachate is 100 pounds per day (lb/day). All other industrial users must achieve a local limit of 160 mg/L.

The above limits apply at the point where the wastewater is discharged to the WPCP. The City Engineer may impose mass limitations in addition to the concentration-based limitations above.

- C. The City may develop BMPs, by ordinance or in an individual or general wastewater discharge permits, to implement Local Limits and the requirements of Section 12.18.020.1.

Section 12.18.020.5 – Right to Revision

The City reserves the right to establish, by ordinance or in individual or general wastewater discharge permits, more stringent Standards or Requirements on discharges to the WPCP consistent with the purpose of this ordinance.

Section 12.18.020.6 – Dilution

No User shall ever 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 a discharge limitation unless expressly authorized by an applicable Pretreatment Standard or Requirement. The City Engineer may impose mass limitations on Users who are using dilution to meet applicable Pretreatment Standards or Requirements, or in other cases where imposition of mass limitations is appropriate.

SECTION 12.18.030 – PRETREATMENT OF WASTEWATER

Section 12.18.030.1 – Pretreatment Facilities

Users shall provide wastewater treatment as necessary to comply with this ordinance and shall achieve compliance with all Categorical Pretreatment Standards, Local Limits, and the prohibitions set out in Section 12.18.020 of this ordinance within the time limits specified by EPA, the State, or the City, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the User's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the City Engineer for review, and shall be acceptable to the City Engineer before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the User from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City under the provisions of this ordinance.

Section 12.18.030.2 – Fats, Oils, and Grease

A. Fats, Oils, and Grease Program

(1) Fats, Oils, and Grease Interceptors:

- (a) FOG separators and grease interceptors shall be provided, at the User's expense, where, in the opinion of the City Engineer, they are necessary for proper handling of wastes containing these substances in excessive amounts, or any flammable wastes or harmful ingredients. All grease interceptors shall be of a type and capacity approved by the City Engineer, and shall be located so it is readily and easily accessible for inspection and cleaning.
 - (b) FOG separators and grease interceptors shall be constructed of impervious materials capable of withstanding abrupt and extreme changes in temperature. They shall be of substantial construction and equipped with removable covers.
 - (c) Where installed, all FOG separators or grease interceptors shall be maintained and in continuous efficient operation at all times.
- (2) These facilities must have a FOG Management Program Permit. An Authorized Inspector and/or the City Engineer shall have right of entry as described in Section 12.18.070.1 of this ordinance.
 - (3) Fees, charges, and penalties are pursuant of Section 12.18.140 of this ordinance.
 - (4) Dishwashers and food grinders are prohibited from discharging through the grease trap pursuant of the State of California Plumbing Code.
 - (5) A grease collection service shall be required for all facilities that generate FOG.
 - (6) If significant grease accumulation (e.g., a partial blockage) is found downstream or if significant grease wicking is found upstream of the process of concern, an Authorized Inspector and/or the City Engineer may inspect the facility. The inspection will include a review of the grease management program, treatment system, waste storage area, and drains not flowing to the treatment system. BMPs not in place, hauler receipts for the prior three (3) years not available, and/or training documents not current may result in future inspections with an assessed fee as published in the City's fee schedule (see Section 12.18.140).
 - (7) If a business is shown to be the cause of a grease-related sewer overflow, the User will be responsible for the cost of clean-up as set forth in Section 12.18.140.

B. Administration of FOG Program

The City shall administer a FOG program, which is intended to prevent fats, oils, and grease, and other substances that are likely to block or create a hazard within

the sewer system from entering the system through use of grease interceptors or grease traps. The City may require any non-domestic User to install a grease interceptor or grease trap according to the guidelines set for in the City's Standard Specifications or other program prior to or at any time after connection to the WPCP if the City discovers or determines subsequent to the connection of the facility, the User produces a waste with characteristics that would require installation of a grease interceptor or grease trap pursuant of this ordinance.

The installation of a proper grease interceptor or grease trap device shall be the responsibility of the User that applies for the connection or wastewater discharge permit. The City shall determine whether a grease interceptor, grease trap, or other interceptor is required on a case-by-case basis based on an evaluation of the following criteria including, but not limited to:

- (1) The type of facility (restaurant, bakery, cheese factory, yogurt shop, gas station, lube facility, etc.);
- (2) The volume of the User's business or operation (number of meals served, number of seats, hours of operation, etc.);
- (3) Size and nature of facilities (including kitchen facilities) based on size, type, number of fixtures, and types of processing and/or cooking equipment used;
- (4) The type of service provided or operation undertaken (such as dine-in meal service versus carry-out meal service);
- (5) The type of foods and other materials used in the cooking, processing, or manufacturing operations carried on within the User's facility;
- (6) The overall potential for grease-laden, flammable, or sand-laden discharges; and
- (7) The existence of devices, procedures, or processes which are designed to minimize the amount of grease, sand, oil, or other flammable liquids from entering the sewer system.

The design, location, and procedures for operation of a required grease interceptor or grease trap shall be approved by the City. Such approval shall be obtained prior to the User's connection of the facility to the WPCP, in the event of new construction or remodeling. In instances where a User has already connected and the City determines that a grease interceptor or grease trap must be installed, the User shall promptly provide for the installation of the device, including providing such design and operational plans as may be required. The installation of a grease interceptor or grease trap as required by this ordinance on an existing User facility shall occur within a reasonable time not to exceed one hundred (100) days after the User has been provided notice that a grease interceptor or grease trap must be installed. This time limit may only be extended by the City in a written agreement.

C. Grease Interceptor Maintenance Procedures and Program

Any User, required by the City and/or this ordinance to install and/or operate a grease interceptor or grease trap, shall adequately maintain the device so that the device is in proper working order at all times. Grease and oil interceptors shall be cleaned by a licensed and permitted waste hauler on a periodic basis to assure that the grease interceptor will operated as designed at all times. Any User, required to install or have in operation a grease interceptor or grease trap pursuant of this ordinance, shall have a plan of operation or program for their facility that is intended to ensure that the grease interceptor or grease trap operates as designed to prevent grease, oil, sand, or other harmful constituents from entering the sewer system. These procedures may include adoption of kitchen practices to minimize grease-laden garbage, which may ultimately enter the facility's drains and floor traps and/or other such procedures as may be required for proper operation of the grease interceptors.

- (1) Grease interceptors shall be cleaned out completely by a FOG collection service as necessary to assure that the grease interceptor will operate as designed at all times or as otherwise specified by the City.

- (2) Decanting or discharging of removed waste back into the grease interceptor, for the purpose of reducing the volume to be hauled, is prohibited.
- (3) The use of additives, directly or indirectly to the plumbing or sewer system, to emulsify grease and/or oil, is specifically prohibited.
- (4) The use of biological additives as a supplement to grease interceptor maintenance, including the addition of microorganisms, may be authorized by the City Engineer. Approval shall be obtained (in writing) prior to use of such additives.
- (5) Maintenance records indicating date of service, volume pumped, name of waste hauler, and waste disposal location for each pumping of the grease interceptor must be kept for a minimum of three (3) years. The records must be provided to the City Engineer when requested during normal business hours.
- (6) All waste removed from a grease interceptor must be disposed of at a facility permitted by Contra Costa County or other applicable regulatory agencies to receive such waste. Pumped out FOG shall not be returned to the sewer system, nor any private wastewater system, nor storm drains.
- (7) Any fixture connected to a grease interceptor shall have a non-removable, secured food strainer of such integrity so as to withstand daily operational usage.

D. Best Management Practices

- (1) **Drain Screen.** After March 1, 2006, drain screens shall be installed on all drainage pipes for all new food services establishments deemed by the City Engineer to generate FOG.
- (2) **Waste FOG:**
 - (a) All waste FOG shall be collected and stored properly in recycling barrels, drums, or bins.
 - (b) Such recycling barrels, drums, or bins shall be maintained appropriately to ensure they do not leak or enter the City's storm water collection system by direct discharge or by commingling with storm water.
 - (c) A licensed collection service must be used to dispose of waste FOG.
- (3) **Food Waste.** All food waste shall be disposed of directly into the trash or garbage and not in sinks.
- (4) **Employee Training:**
 - (a) Employees of food service establishments shall be trained within three (3) months after the effective date of this ordinance, and two (2) times each calendar year thereafter, on the following subjects:
 - (i) How to "dry wipe" pots, pans, dishware, and work areas before washing to remove FOG.
 - (ii) How to properly dispose of food waste and solids in enclosed plastic bags prior to disposal in trash bins or containers to prevent leaking and odors.
 - (iii) The location and use of absorption products to clean under fryers and other locations where grease may be spilled or dripped.
 - (b) Training shall be documented and employee signatures retained indicating each employee's attendance and understanding of the practices.
 - (c) Training records shall be available for review at any reasonable time by an Authorized Inspector and/or the City Engineer.

- (5) Kitchen exhaust filters shall be cleaned as frequently as necessary in order to maintain good operating condition.
 - (6) All BMPs shall be posted conspicuously in the food preparation and dishwashing areas and process areas at all times.
- E. Grease Separators (Traps) for Treating FOG Wastes
- (1) Facilities that have FOG, but are not required to have a grease interceptor, must have an adequate-sized grease trap as determined by the City Engineer.
 - (2) Required connections to grease traps: all three compartment sinks, scullery (preparation) sinks, and pre-wash sinks at dishwashing stations.
 - (3) Prohibited connections or additives to grease traps:
 - (a) Final rinse discharge from automatic dishwashers/sanitizers shall not be connected to the grease trap.
 - (b) Chemical additives, such as chlorinated solvents, or any other additives that causes the emulsification of grease, are strictly prohibited from use in any grease trap.
 - (4) Maintenance of the grease trap shall be as often as required to maintain it in an efficient operating condition.
 - (5) For ease of inspection and maintenance, the area around the grease trap must be kept free of storage and the top of the grease trap must not be bolted down.
 - (6) A maintenance log for the grease trap must be kept for a minimum of three (3) years and must be provided at the request of the City.
- F. Grease Interceptors for Treating FOG Wastes
- (1) Grease interceptors shall be required for new food handling facilities constructed after March 1, 2006.
 - (2) Grease interceptors are required for food handling facilities that generate FOG when there is remodeling, additions, alterations, or repairs valued at or greater than what is specified in the City's fee schedule.
 - (3) Effective March 1, 2006, those food handling facilities operating without a grease interceptor shall, within six (6) months of written notification by the City Engineer, be required to install a grease interceptor if the City Engineer determines that the food service establishment is not adhering to the BMPS set forth in Section 12.18.030.2(D) of this ordinance, or that the food service establishment has caused or contributed to a sewer system blockage resulting in maintenance requirements and/or sewage spills.
 - (4) All new grease interceptors shall be designed, constructed, and installed in accordance with the current City of Richmond Building and Plumbing Codes, and shall be subject to approval by the Building Regulations Department.
 - (5) All submitted drawings shall be prepared by a licensed and registered professional engineer. Any false information or misleading calculations submitted shall be the responsibility of the User.
 - (6) All grease interceptors shall be located such that they are readily and easily accessible for cleaning, inspection, and removal of intercepted waste.
 - (7) A common grease interceptor shared by multiple businesses can be utilized if specifically authorized by the City Engineer upon evidence of legal operating and maintenance agreements between the involved Users.
 - (8) All grease interceptors shall include an effluent sample box and a sanitary tee located on the discharge side of the sample box of a type and size approved by the City.

- (9) Inspection by the City of installed grease interceptors and piping prior to backfilling is required. Piping shall meet the requirements of the City of Richmond Building and Plumbing Code.
- (10) Grease interceptors shall have a clean-out installed after the sample box on the private lateral as required by the City of Richmond Building and Plumbing Code.
- (11) Required connections to grease interceptors: all three compartment sinks, scullery (preparation) sinks, floor drains and mop sinks along the cook line, pre-wash sinks at dishwashing stations, and all other fixtures that contribute grease into the sewer system.
- (12) No food service establishment or other identified User shall construct, remodel, or convert a grease interceptor without approval by the City.
- (13) Prohibited connections or additives to grease interceptors:
 - (a) Final rinse discharge from automatic dishwashers/sanitizers shall not be connected to the grease interceptor.
 - (b) The use of any additive such as surfactants or chemicals shall not be connected to any type of grease interceptor. Chemical additives, such as chlorinated solvents, or another other additives that cause the emulsification of grease, are strictly prohibited from use in any type of grease interceptor.

G. Waivers for Treating FOG Wastes

- (1) A food handling facility, or business with a process of concern determined to have no immediate adverse impact on the sewer system because of business type may be granted a waiver from grease trap or grease interceptors installation requirements.
- (2) The City Engineer may, at any time, revoke a waiver and require the food handling facility to install a grease interceptor.
- (3) A grease interceptor or grease trap may not be required for business types listed below:
 - (a) Facilities only serving beverages;
 - (b) Facilities serving beverages and/or ready-to-eat, packaged, or unpackaged items;
 - (c) Ice cream parlors without any baking or other food preparation;
 - (d) Snack bars with no food preparation other than food warming;
 - (e) Bakeries with no food preparation other than food warming; or
 - (f) Other facilities serving only ready-to-eat foods with or without food warming.

H. Enforcement of FOG Program

Pursuant of this ordinance and/or lawful direction from the City, any User who fails to maintain a grease interceptor or grease trap shall be subject to enforcement procedures set forth in Sections 12.18.100, 12.18.110, and/or 12.18.120 of this ordinance. Enforcement actions may be initiated if the User fails to maintain, pump, and/or institute a proper grease or flammable substance reduction program and/or providing appropriate employee training.

Section 12.18.030.3 – Additional Pretreatment Measures

- A. Whenever deemed necessary, the City Engineer 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 industrial wastestreams, and other such conditions may be necessary to protect the WPCP and determine the User's compliance with the requirements of this ordinance.

- B. The City Engineer may require any person discharging to the WPCP 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.
- C. Water Softeners
This ordinance does not prohibit the use of water softener units which:
 - (1) Were installed and in operation on or before January 31, 1966; and
 - (2) Are regenerated by the owner at the place of use of the unit.
 This requirement shall not apply to water softener units that are commercially recharged and are not regenerated at the User's address. The discharge of salt waste from any unit allowed continuance by the provisions of this ordinance shall be prohibited if the existing unit is replaced or repairs are made thereto in excess of fifty percent (50%) of the original cost of the unit.
- D. Users with the potential to discharge flammable substances may be required to install and maintain an approved combustible gas detection meter.

Section 12.18.030.4 – Accidental Discharge/Slug Discharge Control Plan

The City Engineer shall evaluate whether each SIU needs an accidental discharge/slug discharge control plan or other action to control slug discharges. The City Engineer 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. Alternatively, the City Engineer 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 City Engineer of any accidental or slug discharge, as required by Section 12.18.060.6 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 12.18.030.5 – Hauled Wastewater

- A. Septic tank waste may be introduced into the WPCP only at locations designated by the City Engineer, and at such times as are established by the City Engineer. Such waste shall not violate Section 12.18.020 of this ordinance or any other requirements established by the City. The City Engineer may require septic tank waste haulers obtain coverage under an individual or general wastewater discharge permit.
- B. The City Engineer may require haulers of industrial waste to obtain coverage under an individual or general wastewater discharge permit. The City Engineer may require generators of hauled industrial waste to obtain coverage under an individual or general wastewater discharge permit. The City Engineer may also prohibit the disposal of hauled industrial waste. The discharge of hauled industrial waste is subject to all other requirements of this ordinance.
- C. Industrial waste haulers may discharge loads only at locations designated by the City Engineer. No load may be discharged without prior consent of the City Engineer. The City Engineer may collect samples of each hauled load to ensure compliance with applicable Standards. The City Engineer may require the industrial waste hauler to provide a waste analysis of any load prior to discharge.
- D. Industrial waste haulers must provide a waste-tracking form for every load. This form shall include, at a minimum, the name and address of the industrial waste hauler, permit number, truck identification, names and address of sources of

waste, and volume and characteristics of waste. The form shall identify the type of the industry, known or suspected waste constituents, and whether any wastes are RCRA hazardous wastes.

SECTION 12.18.040 – WASTEWATER DISCHARGE PERMITS

Section 12.18.040.1 – Wastewater Analysis

When requested by the City Engineer, a User must submit information on the nature and characteristics of its wastewater within ten (10) days of the request. The City Engineer is authorized to prepare a form for this purpose and may periodically require Users to update this form.

Section 12.18.040.2 – Wastewater Discharge Permit Requirement

- A. No SIU shall discharge wastewater into the POTW without first obtaining coverage under an individual or general wastewater discharge permit from the City Engineer, except that an SIU that has filed a timely application pursuant to Section 12.18.040.5 of this ordinance may continue to discharge for the time period specified therein.
- B. The City Engineer may require other Users to obtain coverage under an individual or general wastewater discharge permit as necessary to carry out the purposes of this ordinance.
- C. Any violation of the terms and conditions of a wastewater discharge permit shall be deemed a violation of this ordinance, and subjects the Permittee to sanctions set out in Sections 12.18.100, 12.18.110, and 12.18.120 of this ordinance. Obtaining coverage under an individual or general wastewater discharge permit does not relieve the Permittee of its obligation to comply with all Federal and State Pretreatment Standards or Requirements or with any other requirements of Federal, State, or local law.

Section 12.18.040.3 – Wastewater Discharge Permitting: Existing Connections

Any User required to obtain coverage under an individual or general wastewater discharge permit who was discharging wastewater into the WPCP prior to the effective date of this ordinance and who wishes to continue such discharges in the future, shall, within ninety (90) days after said date, apply to the City Engineer for an individual or coverage under a general wastewater discharge permit in accordance with Section 12.18.040.5 of this ordinance, and shall not cause or allow discharges to the WPCP to continue after ninety (90) days of the effective date of this ordinance except in accordance with a wastewater discharge permit issued by the City Engineer.

Section 12.18.040.4 – Wastewater Discharge Permitting: New Connections

Any User required to obtain coverage under an individual or general wastewater discharge permit who proposes to begin or recommence discharging into the WPCP must obtain such permit prior to the beginning or recommencing of such discharge. An application for this wastewater discharge permit, in accordance with Section 12.18.040.5 of this ordinance, must be filed at least ninety (90) days prior to the date upon which any discharge will begin or recommence.

Section 12.18.040.5 – Wastewater Discharge Permit Application Contents

- A. All Users required to obtain coverage under an individual or general wastewater discharge permit must submit a permit application. The City Engineer may require Users to submit all or some of the following information as part of a permit application:
 - (1) Identifying Information
 - (a) The name and address of the facility, including the name of the operator and owner.
 - (b) Contact information, description of activities, facilities, and plant production processes on the premises;

- (2) Environmental Permits. A list of any environmental control permits held by or for the facility.
- (3) Description of Operations
 - (a) A brief description of the nature, average rate of production (including each product produced by type, amount, processes, and rate of production), and SIC codes of the operation(s) carried out by the User. This description should include a schematic process diagram, which indicates points of discharge to the WPCP from the regulated processes.
 - (b) Types of wastes generated, and a list of all raw materials and chemicals used or stored at the facility that are, or could accidentally or intentionally be, discharged to the WPCP;
 - (c) Number and type of employees, hours of operation, and proposed or actual hours of operation;
 - (d) Type and amount of raw materials processed (average and maximum per day);
 - (e) 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;
- (4) Time and duration of discharges;
- (5) The location for monitoring all wastes covered by the permit;
- (6) Flow Measurement. Information showing the measured average daily and maximum daily flow, in gpd, to the WPCP from regulated process streams and other streams, as necessary, to allow use of the combined wastestream formula (40 CFR Part 403.6(e)).
- (7) Measurement of Pollutants
 - (a) The Categorical Pretreatment Standard applicable to each regulated process and any new categorical regulated processes for existing sources.
 - (b) The results of sampling and analysis identifying the nature and concentration and/or mass, where required by the Standard or by the City Engineer, of regulated pollutants in the discharge from each regulated process.
 - (c) Instantaneous, daily maximum, and long-term average concentrations, or mass, where required, shall be reported.
 - (d) The sample shall be representative of daily operations and shall be analyzed in accordance with procedures set out in Section 12.18.060.10 of this ordinance. Where the Standard requires compliance with a BMP or pollution prevention alternative, the User shall submit documentation as required by the City Engineer or the applicable Standards to determine compliance with the Standard.
 - (e) Sampling must be performed in accordance with procedures set out in Section 12.18.060.11 of this ordinance.
- (8) Any requests for a monitoring waiver (or a renewal of an approved monitoring waiver) for a pollutant neither present nor expected to be present in a discharge based on Section 12.18.060.4(B) of this ordinance (40 CFR Part 403.12(e)(2)).
- (9) Any other information as may be deemed necessary by the City Engineer to evaluate the permit application.

B. Incomplete or inaccurate applications will not be processed and will be returned to the User for revision.

Section 12.18.040.6 – Wastewater Discharge Permitting: General Permits

- A. The City Engineer, at his/her discretion, may use general wastewater discharge permits to control discharges to the WPCP if all facilities to be covered by the general wastewater discharge permit meet all the following conditions:
 - (1) Involve the same or substantially similar types of operations;
 - (2) Discharge the same types of wastes;
 - (3) Require the same effluent limitations;
 - (4) Require the same or similar monitoring; and
 - (5) In the opinion of the City Engineer, are more appropriately controlled under a general wastewater discharge permit than under an individual wastewater discharge permit.
- B. To be covered under a general wastewater discharge permit, the User must file a written request for coverage that identifies its contact information, production processes, types of wastes generated, location for monitoring all wastes covered by the general wastewater discharge permit, any requests in accordance with Section 12.18.060.4(B) for a monitoring waiver for a pollutant neither present nor expected to be present in the discharge, and any other information the City Engineer deems appropriate. A monitoring waiver for a pollutant neither present nor expected to be present in the discharge is not effective in the general wastewater discharge permit until after the City Engineer has provided written notice to the User that such a waiver request has been granted in accordance with Section 12.18.060.4(B).
- C. The City Engineer will retain a copy of the general wastewater discharge permit, documentation to support the City's determination that a specific User meets the criteria of Sections 12.18.040.6(A)(1)-(5) and applicable State regulations, and a copy of the User's written request for coverage for three (3) years after the expiration of the general wastewater discharge permit.
- D. The City Engineer may not control a User through a general wastewater discharge permit where the facility is subject to production-based Categorical Pretreatment Standards or Categorical Pretreatment Standards expressed as a mass of pollutant discharged per day or for Users whose limits are based on the combined wastestream formula (40 CFR Part 403.6(e)) or net/gross calculations.

Section 12.18.040.7 – Application Signatories and Certifications

- A. All wastewater discharge permits applications, User reports, and certification statements must be signed by an Authorized Representative of the User (see Section 12.18.010.3(E)) and contain the certification statement in Section 12.18.060.14(A).
- B. If the designation of an Authorized Representative is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the User, a new written authorization satisfying the requirements of this Section must be submitted to the City Engineer prior to or together with any reports to be signed by an Authorized Representative.
- C. A facility determined to be a Non-Significant Categorical Industrial User by the City Engineer pursuant of Section 12.18.010.3(B1) must annually submit the signed certification statement in Section 12.18.060.14(B) (40 CFR Part 403.3(v)(2)).

Section 12.18.040.8 – Wastewater Discharge Permit Decisions

The City Engineer will evaluate the data furnished by the User and may require additional information. Within forty-five (45) days of the receipt of a completed permit application, the City Engineer will determine whether to issue an individual or coverage under a general wastewater discharge permit. The City Engineer may deny any application for an individual or general wastewater discharge permit.

SECTION 12.18.050 – WASTEWATER DISCHARGE PERMIT ISSUANCE

Section 12.18.050.1 – Wastewater Discharge Permit Duration

An individual or coverage under a general wastewater discharge permit shall be issued for a specified period of time, not to exceed five (5) years from the effective date of the permit. A wastewater discharge permit may be issued for a period less than five (5) years, at the discretion of the City Engineer. Each wastewater discharge permit will indicate a specific date upon which it will expire.

Section 12.18.050.2 – Wastewater Discharge Permit Contents

Wastewater discharge permit shall include such conditions as are deemed reasonably necessary by the City Engineer to prevent pass through or interference, protect the quality of the water body receiving WPCP effluent, protect worker health and safety, facility sludge management and disposal, and protect against damage to the WPCP.

- A. Wastewater discharge permits must contain:
- (1) A statement that indicates the issuance date, expiration date, and effective date of the wastewater discharge permit;
 - (2) A statement that the wastewater discharge permit is non-transferrable without prior notification to the City in accordance with Section 12.18.050.5 of this ordinance, and provisions for furnishing the new owner or operator with a copy of the existing wastewater discharge permit;
 - (3) Effluent limits, including BMPs, based on applicable Pretreatment Standards;
 - (4) Self-monitoring, sampling, reporting, notification, and record-keeping 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;
 - (5) 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 12.18.060.4(B);
 - (6) A statement of applicable civil and criminal penalties for violation of Pretreatment Standards and Requirements, and any applicable compliance schedule. Such schedule may not be extend the time for compliance beyond that required by applicable Federal, State, or local law;
 - (7) Requirements to control slug discharge, if determined by the City Engineer to be necessary; and
 - (8) Any grant of the monitoring waiver by the City Engineer must be included as a condition in the User's permit.
- B. Wastewater discharge permits may contain, but need not be limited to, the following conditions:
- (1) Limits on the average and/or maximum rate of discharge, time of discharge, and/or requirements for flow regulation and equalization;
 - (2) Requirements for the installation of pretreatment technology, pollution control, or construction of appropriate containment devices, designed to reduce, eliminate, or prevent the introduction of pollutants to the WPCP;
 - (3) Requirements for the development and implementation of spill control plans or other special conditions including management practices necessary to adequately prevent accidental, unanticipated, or non-routine discharges;
 - (4) Development and implementation of waste minimization plans to reduce the amount of pollutants discharged to the WPCP;

- (5) The unit charge or schedule of User charges and fees for the management of wastewater discharged to the WPCP;
- (6) Requirements for installation and maintenance of inspection and sampling facilities and equipment, including flow measurement devices;
- (7) A statement that compliance with the wastewater discharge permit does not relieve the Permittee of responsibility for compliance with all applicable Federal and State Pretreatment Requirements including those which become effective during the term of the wastewater discharge permit; and
- (8) Other conditions deemed appropriate by the City Engineer to ensure compliance with this ordinance, and Federal and State laws, rules, and regulations.

Section 12.18.050.3 – Permit Appeals

The City shall provide public notice of the issuance of all wastewater discharge permits. Any person, including the User, may petition the City Council to reconsider the terms of a wastewater discharge permit within thirty (30) days of notice of its issuance. The City Council shall give notice to the User of the time and place for a public hearing at least ten (10) days prior to the date of the public hearing. At the public hearing, the User may appear personally or through counsel, cross-examine witnesses, and present evidence in its behalf.

- A. Failure to submit a timely petition for review shall be deemed to be a waiver of the administrative appeal.
- B. In its petition, the appealing party must indicate the wastewater discharge permit provision(s) objected to, the reasons for this objection, and the alternative conditions, if any, it seeks to place in the wastewater discharge permit.
- C. The effectiveness of the wastewater discharge permit shall not be stayed pending appeal.
- D. If the City Council fails to act within sixty (60) days, a request for reconsideration shall be deemed to be denied. Decisions not to reconsider a wastewater discharge permit, not to issue a wastewater discharge permit, or modify a wastewater discharge permit shall be considered final administrative actions for purpose of judicial review.
- E. Aggrieved parties seeking judicial review of the final administrative wastewater discharge permit decision must do so by filing a complaint with the Superior Court for Contra Costa County within thirty (30) days.

Section 12.18.050.4 – Permit Modification

- A. The City Engineer may modify an individual wastewater discharge permit for good cause, including, but not limited to, the following reasons:
 - (1) To incorporate any new or revised Federal, State, or local Pretreatment Standards or Requirements;
 - (2) 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;
 - (3) A change in the WPCP that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - (4) Information indicating that the permitted discharge poses a threat to the WPCP, City personnel, or the receiving waters;
 - (5) Violation of any terms or conditions of the wastewater discharge permit;
 - (6) Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting;
 - (7) To correct typographical or other errors in the wastewater discharge permit; or

- (8) To reflect a transfer of the facility ownership or operation to a new owner or operator where requested in accordance with Section 12.18.050.5.
- B. The City Engineer may modify a general wastewater discharge permit for good cause, including, but not limited to, the following reasons:
 - (1) To incorporate any new or revised Federal, State, or local Pretreatment Standards or Requirements;
 - (2) A change in the WPCP that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - (3) To correct typographical or other errors in the wastewater discharge permit; or
 - (4) To reflect a transfer of facility ownership or operation to a new owner or operator where requested in accordance with Section 12.18.050.5.

Section 12.18.050.5 – Wastewater Discharge Permit Transfer

Individual or coverage under a general wastewater discharge permit may be transferred to a new owner or operator only if the Permittee gives at least sixty (60) days advanced notice to the City Engineer, and the City Engineer approves the permit transfer. The notice to the City Engineer must include a written certification by the new owner or operator which:

- A. States that the new owner/operator has no immediate intent to change the facility's operations and processes;
- B. Identifies the specific date on which the transfer is to occur; and
- C. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders a wastewater discharge permit void as of the date of the facility transfer.

Section 12.18.050.6 – Wastewater Discharge Permit Revocation

The City Engineer may revoke an individual or coverage under a general wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- A. Failure to notify the City Engineer of significant changes to the wastewater prior to the changed discharge;
- B. Failure to provide prior notification to the City Engineer pursuant of Section 12.18.060.5 of this ordinance;
- C. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- D. Falsifying self-monitoring reports and certification statements;
- E. Tampering with monitoring equipment;
- F. Refusing to allow the City Engineer timely access to the facility premises and records;
- G. Failure to meet effluent limitations;
- H. Failure to pay fines;
- I. Failure to pay sewer charges;
- J. Failure to meet compliance schedules;
- K. Failure to complete a wastewater survey or wastewater discharge permit application;
- L. Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- M. Violation of any Pretreatment Standard or Requirement, or any terms of a wastewater discharge permit, or this ordinance.

Section 12.18.050.7 – Wastewater Discharge Permit Reissuance

A User with an expiring individual or coverage under a general wastewater discharge permit shall apply for wastewater discharge permit reissuance by submitting a complete permit application, in accordance with Section 12.18.040.5 of this ordinance, a minimum of ninety (90) days prior to the expiration of the User's existing wastewater discharge permit.

Section 12.18.050.8 – Regulation of Waste Received from Other Jurisdictions

- A. If another jurisdiction, or User located within another jurisdiction, contributes wastewater to the POTW, the City Engineer shall enter into an agreement with the contributing jurisdiction.
- B. Prior to entering into an agreement as required by Section 12.18.050.8(A), the City Engineer shall request the following information from the contributing jurisdiction:
 - (1) A description of the quality and volume of wastewater discharged to the POTW by the contributing jurisdiction;
 - (2) An inventory of all Users located within the contributing jurisdiction that are discharging to the POTW; and
 - (3) Other such information that the City Engineer deems necessary.
- C. An agreement, as required by Section 12.18.050.8(A), shall contain the following conditions:
 - (1) A provision specifying which pretreatment implementation activities, including wastewater discharge permit issuance, inspection and sampling, and enforcement, will be conducted by the contributing jurisdiction, which of these activities will be conducted by the City Engineer; and which of these activities will be conducted jointly by the contributing jurisdiction and City Engineer;
 - (2) A requirement for the contributing jurisdiction to provide the City Engineer with access to all information that the contributing jurisdiction obtains as part of its pretreatment activities;
 - (3) Limits on the nature, quality, and volume of the contributing jurisdiction's wastewater at the point where it discharges to the POTW;
 - (4) Requirements for monitoring the contributing jurisdiction's discharge;
 - (5) A provision ensuring the City Engineer access to facilities of Users located within the contributing jurisdiction's boundaries for the purpose of inspection, sampling, and other duties deemed necessary by the City Engineer; and
 - (6) A provision specifying remedies available for breach of the terms of the agreement.

SECTION 12.18.060 – REPORTING REQUIREMENTS

Section 12.18.060.1 – Baseline Monitoring Reports

Users that become subject to new or revised Categorical Pretreatment Standards are required to comply with the following reporting requirements even if they have been designated as Non-Significant Categorical Industrial Users.

- A. Within either one hundred eighty (180) days after the effect of a Categorical Pretreatment Standard, or the final administrative decision on a category determination under 40 CFR Part 403.6(a)(4), whichever is later, existing Categorical Industrial Users currently discharging to or scheduled to discharge to the WPCP shall submit to the City Engineer a report which contains information listed in Section 12.18.060.1(B). At least ninety (90) days prior to commencement of their discharge, new sources, and sources that become Categorical Industrial Users subsequent to the promulgation of an applicable Categorical Standard, shall submit to the City Engineer a report which contains the information listed in Section 12.18.060.1(B). A new source shall report the method of pretreatment it intends to use to meet applicable Categorical Standards. A new source shall also give estimates of its anticipated flow and quantity of pollutants to be discharged.
- B. Users described above shall submit the information set forth below.
 - (1) All information required in Sections 12.18.040.5(A)(1)(a), 12.18.040.5(A)(2), 12.18.040.5(A)(3)(a), and 12.18.040.5(A)(6).
 - (2) Measurement of Pollutants
 - (a) The User shall provide the information required in Sections 12.18.040.5(A)(7)(a)-(d).
 - (b) The User shall take a minimum of one (1) representative sample to compile data necessary to comply with the requirements of this paragraph.
 - (c) 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 wastewater 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 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 City.
 - (d) Sampling and analysis shall be performed in accordance with Section 12.18.060.10.
 - (e) The City Engineer may allow the submission of a baseline report which utilizes only historical data as long as the data provide information sufficient to determine the need for industrial pretreatment measures.
 - (f) 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 WPCP.
 - (3) Compliance Certification. A statement, reviewed by the User's Authorized Representative (as defined in Section 12.18.010.3(E) and certified by a qualified professional, indicating whether Pretreatment Standard are being met on a consistent basis, and, if not, whether

additional operation and maintenance and/or additional pretreatment is required to meet Pretreatment Standards and Requirements.

- (4) **Compliance Schedule.** If additional pretreatment and/or operation and maintenance will be required to meet Pretreatment Standards, the shortest schedule by which the User will provide such additional pretreatment and/or operation and maintenance must be provided. The completion date in this schedule shall not be later than the compliance date established for the applicable Pretreatment Standard. A compliance schedule pursuant of this Section must meet the requirements set out in Section 12.18.060.2 of this ordinance.
- (5) **Signature and Report Certification.** All baseline monitoring reports must be certified in accordance with Section 12.18.060.14(A) of this ordinance and signed by an Authorized Representative (as defined in Section 12.18.010.3(E)).

Section 12.18.060.2 – Compliance Schedule Progress Reports

The following conditions shall apply to the compliance schedule required by Section 12.18.060.1(B)(4) 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 the 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 City Engineer 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 City Engineer.

Section 12.18.060.3 – 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 to the WPCP, any User subject to such Pretreatment Standards and Requirements shall submit to the City Engineer a report containing the information described in Sections 12.18.040.5(A)(6)-(7) of this ordinance. For all other User subject to Categorical Pretreatment Standards expressed in terms of allowable pollutant discharge per unit of production (or other measure of operation), this report shall include the User's actual production during the appropriate sampling period. All compliance reports must be signed and certified in accordance with Section 12.18.060.14(A) of this ordinance. All sampling will be done in conformance with Section 12.18.060.10.

Section 12.18.060.4 – Periodic Compliance Reports

All SIUs are required to submit periodic compliance reports even if they have been designated a Non-Significant Categorical Industrial User under the provisions of Section 12.18.060.4(C).

- A. Except as specified in Section 12.18.060.4(C), all Users must, at a frequency determined by the City Engineer, submit no less than twice per year (June 15 and December 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 City Engineer or the Pretreatment Standard necessary to determine the compliance status of the User.

- B. The City 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 only present 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 being discharged from the facility provided that the sanitary wastewater is not regulated by an applicable Categorical Pretreatment Standard and otherwise includes no process wastewater.
 - (2) The monitoring waiver is valid only for the duration for 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. (See Section 12.18.040.5(A)(8).)
 - (3) In making a demonstration that a pollutant is not present, the User must provide data from at least one (1) 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 in accordance with Section 12.18.010.3(E), and include the certification statement in Section 12.18.060.14(A).
 - (5) Non-detectable sample results may be used only as a demonstration that a pollutant is not present if the EPA-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 a monitoring waiver by the City Engineer 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 City Engineer for three (3) years after the expiration of the waiver.
 - (7) Upon approval of the monitoring waiver and revision to the User's wastewater discharge permit by the City Engineer, the User must certify on each report with the certification statement in Section 12.18.060.14(C), 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 the monitoring requirements of Section 12.18.060.4(A), or other more frequent monitoring requirements imposed by the City Engineer, and notify the City Engineer.
 - (9) This provision does not supersede certification processes and requirements established in Categorical Pretreatment Standards, except as otherwise specified in the Categorical Pretreatment Standard.
- C. The City may reduce the requirement for periodic compliance reports (40 CFR Part 403.12(e)(1)) to a requirement to report no less frequently than once per year, unless required more frequently in the Pretreatment Standard or by EPA or the State, where the User's total categorical wastewater flow does not exceed any of the following:
- (1) 0.01 percent (0.01%) of the design dry weather hydraulic capacity of the WPCP, or five thousand (5,000) gpd, whichever is smaller, as measured

by a continuous effluent flow monitoring device unless the User discharges in batches.

- (2) 0.01 percent (0.01%) of the design dry weather organic treatment capacity of the WPCP; and
- (3) 0.01 percent (0.01%) 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 12.18.020.4 of this ordinance.

Reduced reporting is not available to Users that have in the last two (2) years been in Significant Noncompliance, as defined in Section 12.18.010.3(B1) 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 City Engineer, 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 12.18.060.14(A) of this ordinance.
- E. All wastewater samples must be representative of the User's discharge. Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure of the 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 requirement of this Section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the City Engineer, using the procedures prescribed in Section 12.18.060.11 of this ordinance, the results of this monitoring shall be included in the report.

Section 12.18.060.5 – Reports of Changed Conditions

Each User must notify the City Engineer of any significant changes to the User's operations or system which might alter the nature, quality, or volume of the its wastewater at least sixty (60) days before the change.

- A. The City Engineer may require the User to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under Section 12.18.040.5 of this ordinance.
- B. The City Engineer may issue an individual or coverage under a general wastewater discharge permit under Section 12.18.050 of this ordinance or modify the existing wastewater discharge permit under Section 12.18.050.4 of this ordinance in response to changed conditions or anticipated changed conditions.

Section 12.18.060.6 – Reports of Potential Problems

- A. In cases 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 WPCP, the User shall immediately telephone and notify the City Engineer of the incident. This notification shall include the location of the discharge, type of waste, concentration, and volume, if known, and corrective actions taken by the User.
- B. Within five (5) days following such discharge, the User shall, unless waived by the City Engineer, submit a detailed written report describing the cause(s) 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 liability which might be incurred as a result of damage to the WPCP, natural resources, or any other damage to person or property; nor shall

such notification relieve the User of any fines, penalties, or other liability which may be imposed pursuant of this ordinance.

- C. A notice shall be permanently posted on the User's bulletin board or other prominent place advising employees who to call in the event of a discharge described in Section 12.18.060.6(A). Employers shall ensure that all employees, who could cause such a discharge to occur, are advised of the emergency notification procedure.
- D. SIUs are required to notify the City Engineer immediately of any changes at its facility affecting the potential for a slug discharge.

Section 12.18.060.7 – Reports from Unpermitted Users

Users not required to obtain a wastewater discharge permit shall provide appropriate reports to the City of Engineer as he/she may require.

Section 12.18.060.8 – Notice of Violation/Repeat Sampling and Reporting

If sampling performed by a User indicates a violation, the User must notify the City Engineer 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 City Engineer within thirty (30) days after becoming aware of the violation. Resampling by the User is not required if the City performs sampling at the User's facility at least once per month, or if the City performs sampling at the User's facility between the time when the initial sampling was conducted and the time when the User or the City receives the results of this sampling, or if the City has performed the sampling and analysis in lieu of the User.

Section 12.18.060.9 – Notification of the Discharge of Hazardous Waste

- A. Any User who commences discharge of hazardous waste shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities, in writing, of any discharge to the WPCP of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR Part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the User discharges more than one hundred (100) kilograms of such waste per calendar month to the WPCP, the notification shall also contain the following information to the extent that such information is known and readily available to the User:
 - (1) An identification of the hazardous constituents contained in the wastes;
 - (2) An estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month; and
 - (3) An estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve (12) months.

All notifications must take place no later than one hundred and eighty (180) days after the discharge commences. Any notification under this paragraph needs to be submitted only once for each hazardous waste discharged. However, notifications of changed conditions must be submitted under Section 12.18.060.5 of this ordinance. The notification requirement of this Section does not apply to pollutants already reported by the Users subject to Categorical Pretreatment Standards under the self-monitoring requirements of Sections 12.18.060.1, 12.18.060.3, and 12.18.060.4 of this ordinance.

- B. Users are exempt from the requirements of Section 12.18.060.9(A) during a calendar month in which they discharge no more than fifteen (15) kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR Parts 261.30(d) and 261.33(e). Discharge of more than fifteen (15) kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes as specified in 40 CFR Parts 261.30(d) and 261.33(e), requires a one-time notification. Subsequent months during which the User discharges more than such quantities of any hazardous waste do not require additional notification.

- C. In the case of any new regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substances as a hazardous waste, the User must notify the City Engineer, the EPA Regional Waste Management Division Director, and State hazardous waste authorities of the discharge of such substance within ninety (90) days of the effective date of such regulations.
- D. In the case of any notification made under this Section, the User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.
- E. This provision does not create a right to discharge any substance not otherwise permitted to be discharged by this ordinance, a wastewater discharge permit issued thereunder, or any applicable Federal or State law.

Section 12.18.060.10 – Analytical Requirements

All pollutant analyses, including sampling techniques, to be submitted as part of the 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 EPA determines that the Part 136 sampling and analysis are inappropriate for the pollutant in question, sampling and analyses shall be performed by using validated analytical methods for any other applicable sampling and analytical procedures, including procedures suggested by the City Engineer or other parties approved by EPA.

Section 12.18.060.11 – 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 the data that is representative of conditions occurring during the reporting period.

- A. Except as indicated in Sections 12.18.060.11(B)-(C), the User must collect wastewater samples using twenty-four- (24-) hour flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the City Engineer. Where time-proportional composite sampling or grab sampling is authorized by the City, the samples must be representative of the discharge. Using protocols (including appropriate preservation) specified in 40 CFR Part 136 and appropriate EPA 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 in the 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 EPA methodologies may be authorized by the City, as appropriate. In addition, grab samples may be required to show compliance with instantaneous limits.
- B. Samples for oil and grease, temperature, pH, cyanide, total phenols, sulfides, and volatile organic 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 12.18.060.1 and 12.18.060.3, 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 City Engineer may authorize a lower minimum. For the reports required in Section 12.18.060.4, the User is required to collect the number of grab samples necessary to assess and assure compliance with applicable Pretreatment Standards and Requirements.

Section 12.18.060.12 – 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 12.18.060.13 – Recordkeeping

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 12.18.020.4(C). 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 City, or where the User has been specifically notified of a longer retention period by the City Engineer.

Section 12.18.060.14 – Certification Statements

- A. Certification of Wastewater Discharge Permit Applications, User Reports, and Initial Monitoring Waiver – The following certification statement is required to be signed and submitted by Users submitting wastewater discharge permit applications in accordance with Section 12.18.040.7; Users submitting baseline monitoring reports under Section 12.18.060.1(B)(5); User submitting compliance reports on Categorical Pretreatment Standard deadlines under Section 12.18.060.3; Users submitting periodic compliance reports required by Section 12.18.060.4(A)-(D); and User submitting an initial request to forego sampling of a pollutant on the basis of Section 12.18.060.4(B)(4). The following certification statement must be signed by an Authorized Representative as defined in Section 12.18.010.3(E):

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.

- B. Annual Certification for Non-Significant Categorical Industrial Users – A facility determined to be a Non-Significant Categorical Industrial User by the City Engineer pursuant of Sections 12.18.010.3(BH)(3) and 12.18.040.7(C) must annually submit the following certification statement signed in accordance with the signatory requirements in Section 12.18.010.4(E). This certification must accompany an alternative report required by the City Engineer.

Based on my inquiry of the person or persons directly responsible for managing compliance with the Categorical Pretreatment Standards under 40 CFR Parts ____, I certify that, to the best of my knowledge and belief that during period from ____, __ to ____, ____ [months, days, years]:

- (1) The facility described as ____ [facility name] met the definition of a Non-Significant Categorical Industrial User as described in Section 12.18.010.3(BH)(3);
- (2) The facility complied with all applicable Pretreatment Standards and requirements during this reporting period; and
- (3) The facility never discharged more than one hundred (100) gallons of total categorical wastewater on any given day during this reporting period.

This compliance certification is based on the following information:

C. Certification of Pollutants Not Present

Users that have been approved a monitoring waiver based on Section 12.18.060.4(B) 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 inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for 40 CFR Part(s) ____ [specify applicable National Pretreatment Standard part(s)], I certify that, to the best of my knowledge and belief, there has been no increase in the level of ____ [list pollutant(s)] in the wastewaters due to the activities at the facility since filing the last periodic report under Section 12.18.060.4(A).

SECTION 12.18.070 – COMPLIANCE MONITORING

Section 12.18.070.1 – Right of Entry: Inspection and Sampling

An Authorized Inspector or the City Engineer shall have the right to enter the premises of any User to determine whether the User is complying with all requirements of this ordinance and any wastewater discharge permit or order issued hereunder. Users shall allow the Authorized Inspector or City Engineer 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 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, the Authorized Inspector or City Engineer shall be permitted to enter without delay for the purposes of performing specific responsibilities.
- B. The Authorized Inspector or City Engineer shall have the right to set up on the User's premises, or require installation of, such devices as are necessary to conduct sampling and/or metering of the User's operations.
- C. The City Engineer 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 manufacturer's specifications 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 notice or verbal request of the City Engineer and shall not be replaced. The costs of clearing such access shall be borne by the User.
- E. Unreasonable delays in allowing the Authorized Inspector or City Engineer access to the User's premises shall be a violation of this ordinance.

Section 12.18.070.2 – Search Warrants

If an Authorized Inspector or City Engineer has been refused access to a building, structure, or property, or any part thereof, and is able to demonstrate probable cause to believe 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 City designed to verify compliance with this ordinance or any permit or order issued hereunder, or to protect overall public health, safety, and welfare of the community, the City may seek issuance of a search warrant from the Contra Costa County Superior Court.

SECTION 12.18.080 – CONFIDENTIAL INFORMATION

Information and data on a User obtained from reports, surveys, wastewater discharge permit applications, wastewater discharge permits, and monitoring programs, and from inspection and sampling activities, shall be available to the public without restriction, unless the User specifically requests, and is able to demonstrate to the satisfaction of the City Engineer, that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets under applicable State law. Any such request must be asserted at the time of submission of the information or data. When requested and demonstrated 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 immediately upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other effluent data as defined in 40 CFR Part 2.302 shall not be recognized as confidential information and shall be available to the public without restriction.

SECTION 12.18.090 – PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE

The City shall publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the WPCP, a list of Users which, at any time during the previous twelve (12) months, were in significant noncompliance with applicable Pretreatment Standards and Requirements. The term significant noncompliance shall be applicable to all SIUs (or any other User that violates paragraphs (C), (D), or (H) of this Section) and shall mean the following:

- A. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six- (6-) month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits as defined in Section 12.18.020;
- B. 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 12.18.020 multiplied by the applicable criteria (1.4 for BOD, 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 by Section 12.18.020 (daily maximum, long-term average, instantaneous limit, or narrative standard) that the City Engineer determines has caused, alone or in combination with other discharges, interference, or pass through, including endangering the health of the WPCP personnel or the general public;
- D. Any discharge of a pollutant that has caused imminent endangerment to the public or the environment, or has resulted in the City Engineer's exercise of its 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 Standard deadlines, period self-monitoring reports, and reports on compliance with compliance schedules.
- G. Failure to accurately report noncompliance; or
- H. Any other violation(s), which may include a violation of BMPs, which the City Engineer determines will adversely affect the operation or implementation of the Pretreatment Program.

SECTION 12.18.100 – ADMINISTRATIVE ENFORCEMENT REMEDIES

Section 12.18.100.1 – Notification of Violation

When the City Engineer 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 City Engineer may serve upon that User a written Notice of Violation. Within fourteen (14) days of the 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 City Engineer. Submission of such a plan in no way relieves the User of liability for any violations occurring before or after receipt of the Notice of Violation. Nothing in this Section shall limit the authority of the City Engineer to take any action, including emergency actions or any other enforcement actions, without first issuing a Notice of Violation.

Section 12.18.100.2 – Consent Orders

The City Engineer may enter into Consent Orders, assurances of compliance, or other similar documents 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 of Sections 12.18.100.4 and 12.18.100.5 of this ordinance and shall be judicially enforceable.

Section 12.18.100.3 – Show Cause Hearing

The City Engineer may order the User which has violated, or continues to violate, any provision of this ordinance, wastewater discharge permit, or order issued hereunder, or any other Pretreatment Standards or Requirement, to appear before the City Engineer and show cause why the proposed enforcement action should not be taken. Notice shall be served on the User specifying the time and place of 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. This notice of the meeting shall be served personally or by registered or certified mail (return receipt requested) at least fourteen (14) days prior to the hearing. Such notice may be served on any Authorized Representative of the User (as defined in Section 12.18.010.3(E) and required by Section 12.18.040.7(A)). A show cause hearing shall not be a bar against, or prerequisite for, taking any other action against the User.

Section 12.18.100.4 – Compliance Orders

When the City Engineer 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 City Engineer may issue an order to the User responsible for the discharge directing that the User comes 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. Compliance orders also may contain other requirements to address the noncompliance, including additional self-monitoring and BMPs designed to minimize the amount of pollutants discharged to the sewer. 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 12.18.100.5 – Cease and Desist Orders

When the City Engineer 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, or that the User’s past violations are likely to recur, the City Engineer 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 continuing or threatened violation, including halting operations and/or terminating the 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 12.18.100.6 – Administrative Fines

- A. When the City Engineer 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 City Engineer may fine such User in accordance with Section 12.20.055 of the City of Richmond Municipal Code. Such fines shall be assessed on a per-violation per-day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

- B. Unpaid charges, fines, and penalties shall, after thirty (30) days calendar days, be assessed an additional penalty of ten percent (10%) of the unpaid balance, and interest shall accrue thereafter at a monthly rate. A lien against the User's property shall be sought for unpaid charges, fines, and penalties.
- C. Users desiring to dispute such fines must file a written request for the City Engineer to reconsider the fine along with full payment of the fine amount within thirty (30) days of being notified of the fine. Where a request has merit, the City Engineer may convene a hearing on the matter. In the event the User's appeal is successful, the payment, together with any interest accruing thereto, shall be returned to the User. The City Engineer may add the costs of preparing administrative enforcement actions, such as notices and orders, to the fine.
- D. Issuance of an administrative fine shall not be a bar against, or a prerequisite for, taking any other action against the User.

Section 12.18.100.7 – Emergency Suspension

The City Engineer 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 City Engineer may also immediately suspend a User's discharge after notice and opportunity to respond, that threatens to interfere with the operation of the WPCP, or which presents, or may present, an endangerment to the environment.

- A. 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 City Engineer may take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the WPCP, its receiving stream, or endangerment to any individuals. The City Engineer may allow the User to recommence its discharge when the user has demonstrated to the satisfaction of the City Engineer that the period of endangerment has passed, unless the termination proceedings in Section 12.18.100.8 of this ordinance are initiated against the User.
- B. A User that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the causes of the harmful contribution and the measures taken to prevent any future occurrence, to the City Engineer prior to the date of any show cause or termination hearing under Sections 12.18.100.3 or 12.18.100.8 of this ordinance.

Nothing in this Section shall be interpreted as requiring a hearing prior to any emergency suspension under this Section.

Section 12.18.100.8 – Termination of Discharge

In addition to provisions in Section 12.18.050.6 of this ordinance, any User who violates the following conditions is subject to discharge termination:

- A. Violation of wastewater discharge permit conditions;
- B. Failure to accurately report 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 12.18.020 of this ordinance.

Such User will be notified of the proposed termination of its discharge and offered an opportunity to show cause under Section 12.18.100.3 of this ordinance why the proposed action should not be taken. Exercise of this option by the City Engineer shall not be a bar to, or a prerequisite for, taking any other action against the User.

SECTION 12.18.110 – JUDICIAL ENFORCEMENT REMEDIES

Section 12.18.110.1 – Injunctive Relief

When the City Engineer 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 City Engineer may petition the Contra Costa County Superior Court through the City Attorney for issuance of a temporary or permanent injunction, as appropriate, which restrains or compels the specific performance of the wastewater discharge permit, order, or other requirement imposed by this ordinance on activities of the User. The City Engineer may also seek other action as 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 12.18.110.2 – 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 City for a maximum civil penalty of \$10,000 per violation, per day. In the case of monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.
- B. The City may recover reasonable attorney's fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the City.
- 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 a User.

Section 12.18.110.3 – Criminal Prosecution

- A. A User who willfully or negligently violates any provision of this ordinance, a wastewater discharge permit, or order issued hereunder, or any other Pretreatment Standard or Requirement shall, upon conviction, be guilty of a misdemeanor, punishable by fines and/or imprisonment in accordance with Section 1.04.100 of the City of Richmond Municipal Code.
- B. A User who willfully or negligently introduces any substance to the WPCP which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor, punishable by fines and/or imprisonment in accordance with Section 1.04.100 of the City of Richmond Municipal Code. 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 false statements, representations, or certifications in any application, record, report, plan, or documentation filed, or required to be maintained, pursuant of this ordinance, a wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method under this ordinance shall, upon conviction, be punished by a fine and/or imprisonment in accordance with Section 1.04.100 of the City of Richmond Municipal Code.
- D. In the event of a second conviction, a User shall be punished by a fine and/or imprisonment in accordance with Section 1.04.100 of the City of Richmond Municipal Code.

Section 12.18.110.4 – Remedies Nonexclusive

The remedies provided for this ordinance are not exclusive. The City Engineer may take any, all, or any combination of these actions against a noncompliant User. Enforcement for pretreatment violations will generally be in accordance with the City's enforcement response plan. However, the City Engineer may take other action against any User when the circumstances warrant. Further, the City Engineer is empowered to make more than one enforcement action against any noncompliant User.

SECTION 12.18.120 – SUPPLEMENTAL ENFORCEMENT ACTION

Section 12.18.120.1 – Penalties for Late Reports

A penalty shall be assessed to any User for each day that a report required by this ordinance, a permit or order issued hereunder is late, beginning five (5) days after the date the report is due. Higher penalties may also be assessed where reports are more than thirty (30) to forty-five (45) days late. Actions taken by the City Engineer to collect late reporting penalties shall not limit his/her authority to initiate other enforcement actions that may include penalties for late reporting violations.

Section 12.18.120.2 – Performance Bonds

The City Engineer may decline to issue or reissue an individual or coverage under a general wastewater discharge permit to any User who has failed to comply with any provision of this ordinance, a previous wastewater discharge permit or order issued hereunder, or any other Pretreatment Standard or Requirement, unless such User first files a satisfactory bond, payable to the City of Richmond, in a sum not to exceed a value determined by the City Engineer to be necessary to achieve compliance.

Section 12.18.120.3 – Liability Insurance

The City Engineer may decline to issue or reissue an individual or coverage under a general wastewater discharge permit to any User who has failed to comply with any provision of this ordinance, a previous wastewater discharge permit or order issued hereunder, or any other Pretreatment Standard or Requirement, unless the User first submits proof that it has obtained financial assurances sufficient to restore or repair damage to the WPCP caused by its discharge.

Section 12.18.120.4 – Payment of Outstanding Fees and Penalties

The City Engineer may decline to issue or reissue an individual or coverage under a general wastewater discharge permit to any User who has failed to pay any outstanding fees, fines, or penalties incurred as a result of any provision of this ordinance, a previous wastewater discharge permit or order issued hereunder.

Section 12.18.120.5 – Water Supply Severance

Whenever a User has violated or continues to violate any provision of this ordinance, an individual or general wastewater discharge permit or order issued hereunder, or any other Pretreatment Standard or Requirement, water service to the User may be severed. Service will recommence, at the User's expense, only after the User has satisfactorily demonstrated its ability to comply.

Section 12.18.120.6 – Public Nuisances

A violation of any provision of this ordinance, a waste discharge permit or order issued hereunder, or any other Pretreatment Standard or Requirement is hereby declared a public nuisance and shall be corrected or abated as directed by the City Engineer. Any person(s) creating a public nuisance shall be subject to the provisions of Chapter 9.22 of the City of Richmond Municipal Code governing such nuisances, including reimbursing the City for any costs incurred in removing, abating, or remedying said nuisance.

Section 12.18.120.7 – Contractor Listing

Users which have not achieved compliance with applicable Pretreatment Standards and Requirements are not eligible to receive a contractual award for the sale of goods or services to the City. Existing contracts for the sale of goods and services to the City held by a User found to be in Significant Noncompliance with Pretreatment Standards or Requirements may be terminated at the discretion of the City Engineer.

SECTION 12.18.130 – AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS

Section 12.18.130.1 – Upset

- A. For the purposes of this Section, upset means an exceptional incident in which there is unintentional and temporary noncompliance with Categorical Pretreatment Standards because of factors beyond the reasonable control of the User. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation.
- B. An upset shall constitute an affirmative defense to an action brought for noncompliance with Categorical Pretreatment Standards if the requirements of Section 13.18.130.1(C) are met.
- C. A User who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and the User can identify the cause(s) of the upset;
 - (2) The facility was at the time being operated in a prudent and workman-like manner and in compliance with applicable operation and maintenance procedures; and
 - (3) The User has submitted the following information to the City Engineer within twenty-four (24) hours of becoming aware of the upset (if this information is provided orally, a written submission must be provided within five [5] days):
 - (a) A description of the indirect discharge and cause of noncompliance;
 - (b) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time of noncompliance is expected to continue; and
 - (c) Steps being taken and/or planned to reduce, eliminate, and prevent recurrence of noncompliance.
- D. In any enforcement proceeding, the User seeking to establish the occurrence of an upset shall have the burden of proof.
- E. Users shall have the opportunity for judicial determination of any claim of upset only in an enforcement action is brought for noncompliance with Categorical Pretreatment Standards.
- F. Users shall control production of all discharges to the extent necessary to maintain compliance with Categorical Pretreatment Standards upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where, among other things, the primary source of power of the treatment facility is reduced, lost, or fails.

Section 12.18.130.2 – Prohibited Discharge Standards

A User shall have an affirmative defense to an enforcement action brought against it for noncompliance with the Prohibitions in Section 12.18.020 of this ordinance if it can prove that it did not know, or have reason to know, that its discharge, alone or in conjunction with discharges from other sources, would cause pass through or interference and that either:

- A. A local limit exists for each pollutant discharged and the User was in compliance with each limit directly prior to, and during, the pass through or interference; or
- B. No local limit exists, but the discharge did not change substantially in nature or constituents from the User's prior discharge when the City was regularly in compliance with its NPDES permit, and in the case of interference, was in compliance with applicable sludge use or disposal requirements.

Section 12.18.130.3 – Bypass

- A. For the purposes of this Section:
- (1) Bypass means the intentional diversion of wastestream from any portion of a User's treatment facility.
 - (2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- B. A User may allow any bypass to occur which does not cause Pretreatment Standards or Requirements to be violated, but only if it is also for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Sections 12.18.130.3(C)-(D).
- C. Bypass Notifications
- (1) If a User knows in advance of the need for a bypass, it shall submit prior notice to the City Engineer, at least ten (10) days before the date of the bypass, if possible.
 - (2) A User shall submit oral notice to the City Engineer of an unanticipated bypass that exceeds applicable Pretreatment Standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the User becomes aware of the bypass. The written submission shall contain the following information:
 - (a) A description of the bypass and its cause;
 - (b) The duration of the bypass, including exact dates and times;
 - (c) If the bypass has not been corrected, the anticipated time it is expected to continue; and
 - (d) The steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.
- The City Engineer may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours.
- D. Bypass
- (1) Bypass is prohibited, and the City Engineer may take enforcement action against a User for a bypass, unless:
 - (a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
 - (c) The User submitted notices as required in Section 12.18.130.3(C).
 - (2) The City Engineer may approve an anticipated bypass, after considering its adverse effects, if he/she determines that it will meet the three conditions listed in Sections 12.18.130.3(D)(1)(a)-(c).

SECTION 12.18.140 – WASTEWATER TREATMENT RATES

Section 12.18.140.1 – Fees and Charges

In order to recover from Users the cost of implementing the Pretreatment Program established in this ordinance, the City Council shall adopt, by resolution, fees and charges, which may include:

- A. Fees for reimbursement of costs of setting up and operating the City's Pretreatment Program;
- B. Fees for monitoring, inspection, and surveillance procedures;
- C. Fees for reviewing accidental discharge procedures and construction;
- D. Fees for wastewater discharge permit applications;
- E. Fees for filing appeals;
- F. Fees for consistent removal by the City of pollutants otherwise subject to Pretreatment Standards or Requirements;
- G. Fees for discharge of storm water, surface water, groundwater, roof runoff containing pollutants or industrial waste, or pretreated hazardous wastewater;
- H. FOG Program fees
 - (1) Initial permit fee;
 - (2) Permit fee for the fourth (4th) year;
 - (3) Inspection and re-inspection fees;
- I. Cost of inspecting and issuing NOVs;
- J. Cost of re-inspection for violations;
- K. Fees associated with grinders
 - (1) Food handling facilities with grinders and no treatment system will incur a ten percent (10%) surcharge to the sewer service fee.
 - (2) Food handling facilities with grinders connected to the grease trap is a violation.
 - (a) Five (5) working days shall be granted to correct violation,
 - (b) If not corrected, then administrative orders will be issued;
 - (c) The penalties to be imposed shall be \$250 for the first violation, \$500 for the second violation, and \$1,000 for the third violation and each violation thereafter.
- L. Blockages determined to be caused by FOG and associated with a responsible party with evidence (i.e., televised recording of the source lateral), shall pay the City for the costs incurred (equipment and personnel hours plus additional costs if lift stations are impacted with the subject FOG) to clear the line plus ten percent (10%) when it is the second incident. The User shall be warned subsequent to the first incident of their financial obligation to the City. The User shall also be liable for all incidental damage to all public and private property resulting from the blockage.
- M. All fees, charges, and penalties, are due by the property owner.
- N. Other fees as the City may deem necessary to carry out the requirements contained in this ordinance.

Section II. **Severability.** If any sections, subsection, subdivision, paragraph, sentence, clause or phrase or this Ordinance for any reason held to be unconstitutional or invalid, such a decision shall not affect the validity of the remaining portions of this Ordinance. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance irrespective of the unconstitutionality or invalidity of any section, subsection, subdivision, paragraph, sentence, clause or phrase.

Section III. **Effective Date.** This Ordinance becomes effective September 1, 2011.

First read at a regular meeting of the City Council of the City of Richmond held on July 19, 2011 and finally passed and adopted at a joint meeting thereof held July 26, 2011 by the following vote:

AYES: Councilmembers Bates, Beckles, Booze, Ritterman, Rogers, Vice Mayor Butt, and Mayor McLaughlin.

NOES: None.

ABSTENTIONS: None.

ABSENT: None.

DIANE HOLMES
Clerk of the City of Richmond
(SEAL)

Approved:

GAYLE MCLAUGHLIN
Mayor

Approved as to form:

RANDY RIDDLE
City Attorney

State of California }
County of Contra Costa } : ss.
City of Richmond }

I certify that the foregoing is a true copy of Ordinance No. 18-11 N.S., finally passed and adopted by the City Council of the City of Richmond at a joint meeting held on July 26, 2011.

J-2 Organizational Chart

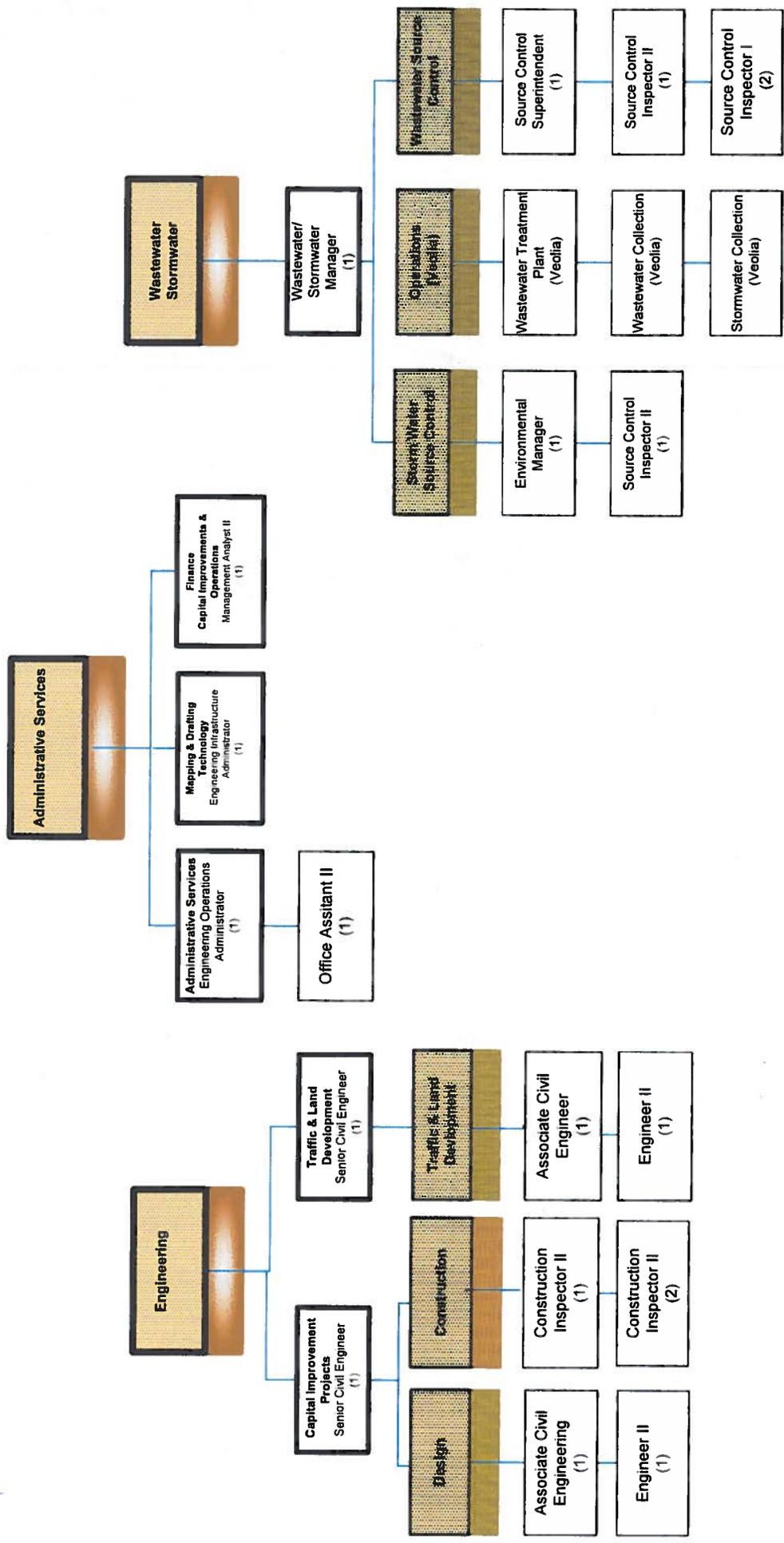


Engineering Services Department FY2013-2015 Organizational Chart

Existing FTE = 21, Proposed FTE = 20

Legend:

- Existing Pos.
- Main Program
- Sub-Program



J-3 FOG Inspection Form

Appendix J-3

FOG Inspection Report

Scheduled Unscheduled Follow-Up Audit
 City of Richmond Source Control Program
 450 Civic Center Plaza, Richmond, CA, 94804

Date of Inspection:	City Inspector:
Facility Name:	ID Number:
Facility Address:	Facility Zip Code:
Owner or Authorized Rep:	Telephone:
Property Owner:	Telephone:
Address:	e-mail:
Handouts provided? <input type="checkbox"/> Yes <input type="checkbox"/> No	Tips: <input type="checkbox"/> English <input type="checkbox"/> Other
Posters: <input type="checkbox"/> English <input type="checkbox"/> Other	

Type of Facility Business Activity

Fast Food (Carryout) <input type="checkbox"/>	Restaurant <input type="checkbox"/>	Bakery <input type="checkbox"/>	Grocery w/ Deli <input type="checkbox"/>	Butcher/Meats <input type="checkbox"/>	Donut Shop <input type="checkbox"/>	Ice Cream <input type="checkbox"/>	Deli <input type="checkbox"/>
School (Cafeteria) <input type="checkbox"/>	Hospital w/ Service <input type="checkbox"/>	Church w/ Kitchen <input type="checkbox"/>	Rest Home <input type="checkbox"/>	Coffee Shop <input type="checkbox"/>	Other <input type="checkbox"/>		

Grease & Oil Removal System (RS)

Type	Oil/Grease Bin	Vault	Trap	Mechanical	Manual	None
1 Size (inches-GPH-lbs/day)						<input type="checkbox"/>
2 Condition (circle one)	E G S N I F NA	E G S N I F NA	E G S N I F NA	E G S N I F NA	E G S N I F NA	<input type="checkbox"/>
3 Garbage Grinder <input type="checkbox"/> Yes <input type="checkbox"/> No	Connect to Sanitary Sewer? <input type="checkbox"/> Yes <input type="checkbox"/> No					
4 Dish Washer <input type="checkbox"/> Yes <input type="checkbox"/> No	Connect to Grease Removal Device? <input type="checkbox"/> Yes <input type="checkbox"/> No					
5 Comments:						

Equipment Washing Procedures

6 BMP's effective?	E G S F NA	Training in place & effective?	E G S F NA
7 Dry Wipe & Food Scraping practices?	E G S F NA	Posted materials/Poster <input type="checkbox"/> Yes <input type="checkbox"/> No	
8 Dumpster area clean	E G S F NA	Outdoors area (dining, & parking) swept? <input type="checkbox"/> Yes <input type="checkbox"/> No	
9 Dry sweep spills?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Storm drain marked/stenciled <input type="checkbox"/> Yes <input type="checkbox"/> No	
10 Cleaning mats, filters, trash receptacles	<input type="checkbox"/> inside <input type="checkbox"/> outside	<input type="checkbox"/> to storm drain <input type="checkbox"/> covered	<input type="checkbox"/> to sanitary sewer <input type="checkbox"/> covered Other:
11 Comments			

Grease & Waste Oil Storage/Disposal/Maintenance

12 Hauler's Name	Address:	Frequency: <input type="checkbox"/> Annually <input type="checkbox"/> Semi-annually <input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly <input type="checkbox"/> Weekly
14 Maintenance Records on site	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15 Date Last Serviced		
16 Grease/Oil Bin Location	<input type="checkbox"/> inside <input type="checkbox"/> outside	If outside- <input type="checkbox"/> covered? Potential storm drain issue? <input type="checkbox"/> Yes <input type="checkbox"/> No
17 Comments		

Required actions

20 Follow-up Inspection Required	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date _____ (within 90 days of current inspection date)
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General Comments:

Overall Rating of Facility E-Excellent, G-Good, S-Satisfactory, NI-Needs Improvement F-Fail, NA-Not Applicable	E(5) <input type="checkbox"/> G(4) <input type="checkbox"/> S(3) <input type="checkbox"/> NI(2) <input type="checkbox"/> F(1) <input type="checkbox"/> NA <input type="checkbox"/>
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Appendix K-1 2012-2013 Annual Budget



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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

PG 1
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FOR 2013 01

ACCOUNTS FOR:
4003 WASTEWATER

	ORIGINAL APPROP	TRANSFRS/ADJUSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
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34 LICENSES, PRMITS&FEES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 320231 LIC & PERM
40322831 340408 DESG REV
40322831 340458 PRETREATMT

TOTAL LICENSES, PRMITS&FEES

	-5,000	0	-5,000	-1,085.00		.00	21.7%
	-10,000	0	-10,000	-1,705.00		.00	17.1%
	-150,000	0	-150,000	.00		.00	.0%*
TOTAL	-165,000	0	-165,000	-2,790.00		.00	1.7%

37 CHARGES FOR SERVICES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 341501 M_CHG SERV

TOTAL CHARGES FOR SERVICES

	0	0	0	-625.00		.00	100.0%
TOTAL	0	0	0	-625.00		.00	100.0%

40 SALARIES AND WAGES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400003 LOCAL 1021
40322831 400006 PT TEMP
40322831 400031 OT GENERAL

TOTAL SALARIES AND WAGES

	168,348	0	168,348	14,029.00		.00	8.3%
	106,230	0	106,230	3,709.73		.00	3.5%
	15,750	0	15,750	1,332.68		.00	8.5%*
TOTAL	290,328	0	290,328	19,071.41		.00	6.6%

41 PYROLL/FRINGE BENEFIT

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400103 MED TAX BR

	2,463	0	2,463	276.53		.00	11.2%*
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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

PG 2
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FOR 2013 01

ACCOUNTS FOR:
4003 WASTEWATER

	ORIGINAL APPROP	TRANSFERS/ADJSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
40322831 400104 PERS BEN	26,614	0	26,614	2,217.84		24,396.16	8.3%
40322831 400105 HLTH INS	34,833	0	34,833	2,452.00		32,381.00	7.0%
40322831 400106 DENT INS	2,834	0	2,834	236.10		2,597.90	8.3%
40322831 400109 EMP ASSIST	72	0	72	7.66		64.34	10.6%*
40322831 400111 VISION	440	0	440	36.68		403.32	8.3%*
40322831 400112 LIFE INS	208	0	208	17.40		190.60	8.4%*
40322831 400114 LT DISAB	968	0	968	80.66		887.34	8.3%*
40322831 400116 UNEM INS	912	0	912	114.00		798.00	12.5%*
40322831 400117 PERS DEVE	1,500	0	1,500			1,500.00	0%
40322831 400122 PB/WC-PROF	10,017	0	10,017	1,055.45		8,961.55	10.5%*
40322831 400128 PENS STAB	3,261	0	3,261	271.74		2,989.26	8.3%
TOTAL PYRL/FRINGE BENEFIT	84,122	0	84,122	6,766.06		77,355.94	8.0%

42 PROF & ADMIN

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400201 PROF SVCS	6,400	0	6,400			6,400.00	0%
40322831 400242 MILEAGE	120	0	120			120.00	0%
40322831 400243 CONF M&TRG	8,100	0	8,100			8,100.00	0%
40322831 400261 MEMB &DUE	2,200	0	2,200			2,200.00	0%
TOTAL PROF & ADMIN	16,820	0	16,820			16,820.00	0%

43 OTHER OPERATING

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400232 PRINT&BIND	1,600	0	1,600			1,600.00	0%
40322831 400233 DUPLICATING	725	0	725			725.00	0%
40322831 400304 EOPT RENT	27,425	0	27,425			27,425.00	0%
40322831 400322 MISC EXPS	5,395	0	5,395			5,395.00	0%
40322831 400341 OFF SUPP	5,290	0	5,290			5,290.00	0%
40322831 400381 CLTHG &SUP	3,720	0	3,720			3,720.00	0%
40322831 400392 SALES TAX	20	0	20			20.00	0%
TOTAL OTHER OPERATING	44,175	0	44,175			44,175.00	0%

44 UTILITIES



CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

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FOR 2013 01

ACCOUNTS FOR: 4003 WASTEWATER	ORIGINAL APPROP	TRANFRS/ ADJSTMNTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400401 TEL&TELEG	3,656	0	3,656	1.05		3,654.95	.0%
TOTAL UTILITIES	3,656	0	3,656	1.05		3,654.95	.0%
45 EQPT & CONTRACT SVCS							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400501 EQPT R/M	24,200	0	24,200	.00		24,200.00	.0%
TOTAL EQPT & CONTRACT SVCS	24,200	0	24,200	.00		24,200.00	.0%
47 COST POOL							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400571 REPL VEH	6,990	0	6,990	.00		6,990.00	.0%
40322831 400586 C.A.P ADMIN	100,810	0	100,810	.00		100,810.00	.0%
40322831 400591 CVCTR ALLO	49,092	0	49,092	.00		49,092.00	.0%
TOTAL COST POOL	156,892	0	156,892	.00		156,892.00	.0%
48 ASSET/CAPITAL OUTLAY							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400604 FURN<5K	6,750	0	6,750	.00		6,750.00	.0%
TOTAL ASSET/CAPITAL OUTLAY	6,750	0	6,750	.00		6,750.00	.0%



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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

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FOR 2013 01

	ORIGINAL APPROP	TRANSFRS/ ADJSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
GRAND TOTAL	461,943	0	461,943	22,423.52		439,519.48	4.9%

** END OF REPORT - Generated by MARY PHELPS **

K-2 2013-2014 Annual Budget



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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

PG 1
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FOR 2014 01

ACCOUNTS FOR:
4003 WASTEWATER

	ORIGINAL APPROP	TRANSFERS/ADJUSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
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34 LICENSES, PRMITS&FEES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 320231 LIC & PERM
40322831 340408 DESG REV
40322831 340458 PRETREATMT

TOTAL LICENSES, PRMITS&FEES

	-5,000	0	-5,000	-600.00		-4,400.00	12.0%
	-1,000	0	-1,000	-3,100.00		2,100.00	310.0%
	-20,000	0	-20,000	.00		-20,000.00	.0%*
TOTAL	-26,000	0	-26,000	-3,700.00		-22,300.00	14.2%

37 CHARGES FOR SERVICES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 341501 M CHG SERV

TOTAL CHARGES FOR SERVICES

	-125,000	0	-125,000	-960.00		-124,040.00	.8%*
TOTAL	-125,000	0	-125,000	-960.00		-124,040.00	.8%

40 SALARIES AND WAGES

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400002 MGMT LC 21
40322831 400003 LOCAL 1021
40322831 400006 FT TEMP
40322831 400031 OT GENERAL
40322831 400048 BILLING PAY

TOTAL SALARIES AND WAGES

	87,325	0	87,325	.00		87,325.00	.0%
	237,992	0	237,992	19,267.00		218,725.00	8.1%
	106,230	0	106,230	.00		106,230.00	.0%
	15,750	0	15,750	1,449.89		14,300.11	9.2%*
	4,584	0	4,584	121.16		4,463.00	2.6%
TOTAL	451,881	0	451,881	20,838.05		431,043.11	4.6%

41 PYROLL/FRINGE BENEFIT

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400103 MED TAX_ER

	4,772	0	4,772	302.16		4,469.84	6.3%
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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

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ACCOUNTS FOR:
4003 WASTEWATER

	ORIGINAL APPROP	TRANSFERS/ADJSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
40322831 400104 PERS BEN	55,689	0	55,689	3,336.60		52,352.40	6.0%
40322831 400105 HLTH INS	54,644	0	54,644	4,428.29		50,215.71	8.1%
40322831 400106 DENT INS	5,880	0	5,880	367.38		5,512.62	6.2%
40322831 400109 EMP ASSIST	184	0	184	11.49		172.51	6.2%
40322831 400111 VISION	924	0	924	55.02		868.98	6.0%
40322831 400112 LIFE INS	857	0	857	24.30		832.70	2.8%
40322831 400114 LT DISAB	2,662	0	2,662	120.99		2,541.01	4.5%
40322831 400116 UNEM INS	1,824	0	1,824	114.00		1,710.00	6.3%
40322831 400117 PERS DEVE	4,500	0	4,500	.00		4,500.00	.0%
40322831 400121 PB/WC-CLER	6,418	0	6,418	508.88		5,909.12	7.9%
40322831 400122 PB/WC-PROF	11,683	0	11,683	955.00		10,728.00	8.2%
40322831 400127 OPRB	8,480	0	8,480	503.04		7,976.96	5.9%
40322831 400128 PENS STAB	3,582	0	3,582	212.50		3,369.50	5.9%
TOTAL PYRLL/FRINGE BENEFIT	162,099	0	162,099	10,939.65		151,159.35	6.7%

42 PROF & ADMIN

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400201 PROF SVCS	45,000	0	45,000	.00		45,000.00	.0%
40322831 400242 MILEAGE	120	0	120	.00		120.00	.0%
40322831 400243 CONF M&TRG	8,100	0	8,100	.00		8,100.00	.0%
40322831 400261 MEMB &DUE	3,050	0	3,050	.00		3,050.00	.0%
TOTAL PROF & ADMIN	56,270	0	56,270	.00		56,270.00	.0%

43 OTHER OPERATING

40322831 WW/PRE-TRTMNT (S-DIV)

40322831 400332 PRINT&BIND	1,600	0	1,600	.00		1,600.00	.0%
40322831 400333 DUPLICATING	725	0	725	.00		725.00	.0%
40322831 400304 EQPT RENT	26,125	0	26,125	.00		26,125.00	.0%
40322831 400322 MISC EXPS	45,500	19,995	65,495	.00	19,995.00	45,500.00	30.5%*
40322831 400341 OFF SUPP	5,290	0	5,290	.00		5,290.00	.0%
40322831 400381 CLTHG &SUP	4,320	0	4,320	.00		4,320.00	.0%
40322831 400392 SALES TAX	35	0	35	.00		35.00	.0%



CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

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FOR 2014 01

ACCOUNTS FOR: 4003 WASTEWATER	ORIGINAL APPROP	TRANSFERS/ ADJUSTMS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
TOTAL OTHER OPERATING	83,595	19,995	103,590	.00	19,995.00	83,595.00	19.3%
44 UTILITIES							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400401 TEL&TELEG	4,200	0	4,200	.00	.00	4,200.00	.0%
TOTAL UTILITIES	4,200	0	4,200	.00	.00	4,200.00	.0%
45 EQPT & CONTRACT SVCS							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400501 EQPT R/M	24,200	0	24,200	.00	.00	24,200.00	.0%
TOTAL EQPT & CONTRACT SVCS	24,200	0	24,200	.00	.00	24,200.00	.0%
47 COST POOL							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400571 REPL VEH	6,337	0	6,337	528.00	.00	5,809.00	8.3%
40322831 400574 GEN LIAB	0	0	0	15,170.00	.00	-15,170.00	100.0%*
40322831 400586 C.A.P ADMN	100,810	0	100,810	8,401.00	.00	92,409.00	8.3%*
40322831 400591 CVCTR ALLO	40,754	0	40,754	20,377.00	.00	20,377.00	50.0%*
TOTAL COST POOL	147,901	0	147,901	44,476.00	.00	103,425.00	30.1%
48 ASSET/CAPITAL OUTLAY							
40322831 WW/PRE-TRTMNT (S-DIV)							
40322831 400604 FURN<5K	6,750	0	6,750	.00	.00	6,750.00	.0%
TOTAL ASSET/CAPITAL OUTLAY	6,750	0	6,750	.00	.00	6,750.00	.0%



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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE

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FOR 2014 01

ACCOUNTS FOR:
4003 WASTEWATER

ORIGINAL APPROP	TRANSFERS/ ADJSTMTS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
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CITY OF RICHMOND
ENGINEERING - WASTEWATER YEAR-TO-DATE



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FOR 2014 01

ORIGINAL APPROP	TRANSFERS/ ADJUSTMS	REVISED BUDGET	YTD ACTUAL	ENC/REQ	AVAILABLE BUDGET	PCT USED
785,896	19,995	805,891	71,593.70	19,995.00	714,302.46	11.4%

GRAND TOTAL

** END OF REPORT - Generated by MARY PHELPS **

K-3 Equipment Summary

Appendix K-3
SUMMARY OF PRETREATMENT BUDGET

	<i>This Reporting Year</i>		<i>Previous Reporting Year</i>	
	<i>Person-hours</i>	<i>Cost</i>	<i>Person-hours</i>	<i>Cost</i>
<i>Total:</i>	8,190	\$451,881	6,240	\$290,328

SUMMARY OF PRETREATMENT EQUIPMENT PURCHASES

	<u><i>EQUIPMENT PURCHASED 2013</i></u>	<u><i>COST</i></u>
A	<i>Contracted Laboratory Services—Veolia Water Services (2012)</i>	<i>\$43,500.00</i>
B	<i>Ford® F-150 Truck</i>	<i>\$23,500.00</i>
C	<i>2 ISCO® 6712 Compact Samplers & accessories</i>	<i>\$10,832.00</i>
D	<i>Traffic Cones, signs</i>	<i>\$500.00</i>
E	<i>Linko® Data Systems Pretreatment Program Update Module</i>	<i>\$37,000</i>
F	<i>Ford® Escape SUV</i>	<i>\$21,350</i>
G	<i>Apple® iPads (5 Units)</i>	<i>\$5,500</i>
H		
I		
J		
	<i>Grand Total</i>	<i>\$142,182.00</i>

ALL PRIOR YEARS

EQUIPMENT

Hewlett Packard® laserjet 4050 printer
2 Baggage Caddy & Case hand trucks
Xerox® copier/printer/machine (lease)
1 ISCO® Acuwell Portable sampling pump
2 ISCO®2900 samplers
Sampling Tips
2 Ice Coolers
2 Sun Canopies
YSI Multi Probe Meter (DO, Conductivity, pH)
Linko® Data Systems Pretreatment Program and Fog Database Program

West County Times

1050 Marina Way S
Richmond, CA 94804
(510) 262-2740

RICHMOND, CITY OF
COMMUNITY ECONOMIC DEV/PLANNING DEPT, 1401
MARINA WAY S
RICHMOND CA 94804-3746

PROOF OF PUBLICATION

FILE NO. Wastewater Violator

In the matter of

West County Times

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter.

I am the Principal Legal Clerk of the West County Times, a newspaper of general circulation, printed and published at 2640 Shadelands Drive in the City of Walnut Creek, County of Contra Costa, 94598

And which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Contra Costa, State of California, under the date of August 29, 1978. Case Number 188884.

The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

3/2/2013

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 4th day of March, 2013.



Signature

Legal No.

0004783373

2012 SIGNIFICANT INDUSTRIAL WASTEWATER VIOLATOR

The following City of Richmond Industries were in significant non-compliance for federal standards. This announcement satisfies the federal regulation requiring public notification of significant violators in 40 CFR 403.8(f) (2) (viii). The industrial violations which occurred in 2012 were:

California Oils Corporation
1145 Harbour Way South - Vegetable Oil Processing (Oil & Grease for local limit) - currently on a time schedule to comply.

West County Wastewater District
2377 Garden Track Road - Landfill Leachate (Ammonia for local limits, and late submittal of reports) - on a time schedule to comply.

For more information, contact Mary Phelps, City of Richmond Source Control Inspector III, at (510) 621-1269.

WCT 4783373 Mar. 2, 2013

L-2 2013 List of Violators

**2013 SIGNIFICANT INDUSTRIAL
WASTEWATER VIOLATOR**

The following City of Richmond Industry was in Significant Non-Compliance (SNC) For the City of Richmond's local limits. This announcement satisfies the federal regulation requiring public notification of significant violators in 40 CFR 403.8 (f) (2) (viii). The industrial violations which occurred in 2013 were:

Bay Area Rapid Transit

1281 Visalia Ave., mass transit (Heavy Metals for local limits) – on a time schedule to comply.

For more information, contact Mary Phelps, City of Richmond Source Control Inspector III, at (510) 621-1269.

Appendix P-1

PCS Data Entry Form

POTW Name: **RICHMOND, CITY OF**

NPDES Permit #: **CA0038539**

Period Covered By This Report: 01/01/2013 (PSSD) 12/31/2013 (PSED)
Start Date End Date

Number of Significant Industrial Users in SNC With Pretreatment Compliance Schedule: 2 (SSNC)

Number of Notices of Violation and Administrative Orders Issued Against Significant Industrial Users: 20 (FENF)

Number of Civil & Criminal Judicial Actions Against Significant Industrial Users: 0 (JUDI)

Number of Significant Industrial Users with Significant Violations Published: 1 (SVPU)

Number of Industrial Users From Which Penalties Have Been Collected: 0 (IUPN)