



February 28, 2014

Dylan Garner
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Garner:

The **2013 Annual Pollutant Prevention & Minimization Program Report** for the City of Richmond is enclosed.

"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."

A handwritten signature in blue ink that reads "Chad Davisson".

Chad Davisson, General Manager
Richmond Municipal Sewer District

copies: Mary Phelps, Source Control Inspector III
Aaron Winer, Veolia Water North America
File

FEBRUARY 28, 2014

CITY OF RICHMOND

Pollution Prevention Report - 2013

submitted to

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION



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1. Treatment Plant Description

This annual report has been prepared by the City of Richmond in accordance with Section VI.C.3.b. of 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.

Through the City Charter, the City of Richmond administers the Richmond Municipal Sewer District which owns Water Pollution Control Plant (Richmond Plant). 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, operates the Richmond Plant and the collection system under contract and direction of the City of Richmond.

The Richmond Plant has a design capacity of 16 MGD for dry weather and a hydraulic capacity of 40 MGD for wet weather conditions. The secondary treatment system however can only process a peak of 20 MGD. As such, during heavy rains and high plant flows, flows above 20 MGD are diverted around the secondary process and into 2,000,000 (2M) gallon storm storage basins. Once the 2M gallon storage basins are fully utilized, chlorinated primary effluent is combined (blended) with fully treated secondary effluent prior to dechlorination and discharge (it is important to note the secondary treatment system can only sustain 20 MGD flows for a short duration before the secondary treatment (activated sludge) process begins to deteriorate). 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. 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 serving 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.

2. Current Pollutants of Concern and Sources

Operation of the Plant and the City's collection system are governed by National Pollutant Discharge Elimination System (NPDES) Permit No. CA0038539 currently implemented as Order No. R2-2013-0016.

As an ongoing condition of its NPDES permit, the City is required to submit an annual Pollutant Prevention Report (P2 Report) to summarize efforts undertaken to address pollutants of concern (POCs). The City's POCs, the reason for concern, and the potential sources are presented in **Table 1**.

Monitoring results and the possible sources of each pollutant are presented in the following subsections.

Table 1. City of Richmond Pollutants of Concern

Pollutant	Concern	Sources
Copper	Regional POC, effluent limits in NPDES permit	Vehicle service facilities, machine shops; residential and commercial copper plumbing corrosion
Cyanide	Regional POC, effluent limits in NPDES permit	Organic Chemical Manufacturing, medical facilities, and the sample preservation process
Lead	2012 effluent concentrations close to chronic water quality objective	Vehicle service facilities, machine shops; residential and commercial
Mercury	Regional POC, effluent limits in NPDES permit	Dental and medical waste, vehicle service facilities
Nickel	Effluent limits in NPDES permit	Vehicle service facilities, machine shops;
Oil & Grease	Tracking to minimize SSOs, effluent limits in NPDES permit	Vehicle service facilities, food service facilities, and machine shops
PCBs	-Regional POC, effluent limits in NPDES permit	Industrial equipment, building demolition waste

COPPER

During the NPDES permit reissuance in 2013, the City demonstrated feasibility of compliance with final effluent limits issued for total copper. However, because copper is a regional pollutant of concern, copper remains a part of the City's pollution prevention program. The final effluent limits for Copper are shown in **Table 2**. Influent and effluent results for Copper from 2008 through 2013 are shown in **Figure 1**.

Table 2. Effluent Limits for Total Copper

Pollutant	Average Monthly Effluent Limit (µg/L)	Maximum Daily Effluent Limit (µg/L)
Total Copper	3.67	44

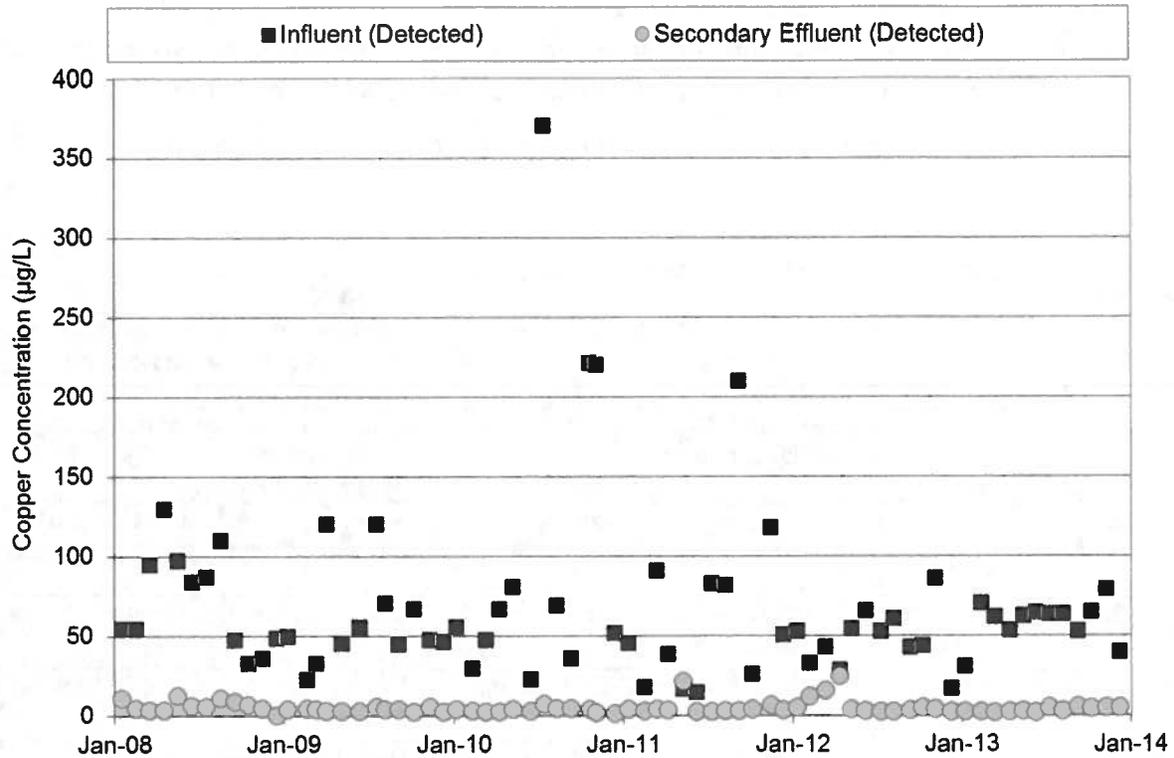


Figure 1. Total Copper Concentrations Measured at the City of Richmond 2008 - 2013

The City conducted copper sampling within its collection system in November 2009 which indicated that copper concentrations exist throughout the entire service area. The City has inventoried potential sources including machine shops, automotive service facilities, laundries and cleaners, restaurants, and medical facilities. As shown in Table 3, these types of businesses have been identified as contributing elevated concentrations of copper in other municipalities as well.

The City identified 13 machine shops, 61 automotive service facilities, 17 dry cleaners/professional laundries, and 154 restaurants (Food Handling Facilities) that are connected to the sewer system.

Table 3. Commercial Sources of Copper and Frequency of Inspections

Businesses in Richmond	Estimated Copper Concentration (µg/L)	Sources of Data for Estimated Copper Concentrations
Machine Shops	450.0	"Palo Alto Pollution Prevention Program, 1998 Monitoring Data," (City of Palo Alto, 1998). Data collected from machine shops includes machining, tool repair, metal works & welding, sheet metal, and machinery businesses.
Automotive Service Facilities	330.0	"Tools to Measure Source Control Program Effectiveness," (Water Environment Research Foundation, Project 98-WSM-2, 2000). Data collected from vehicle service facilities includes tire automotive engine repair, tire shops, and auto body repair.
Laundries & Cleaners	78.3	"Residential Metals Study," (Larry Walker Associates, prepared for the Central Contra Costa Sanitary District, March, 1994).
Restaurants	65.0	"Collection System Monitoring Data, August 1998," (Sonoma Valley County Sanitation District, 1998).

CYANIDE

During the NPDES permit reissuance in 2013, the City demonstrated feasibility of compliance with final effluent limits for cyanide. The final effluent limits for Cyanide are shown in **Table 4**.

Table 4. Effluent Limits for Cyanide

Pollutant	Average Monthly Effluent Limit (AMEL) (µg/L)	Average Weekly Effluent Limit (µg/L)	Water Quality Objective (WQO) (µg/L)
Cyanide	19	41	2.9

Influent and effluent monitoring results for Cyanide from 2008 through 2013 are shown in **Figure 5**. Effluent concentrations have been below the AMEL of 19 µg/L. However, they exceed the Water Quality Objective of 2.9 µg/L.

Influent and effluent results for Cyanide from 2008 through 2013 are shown in **Figure 2**.

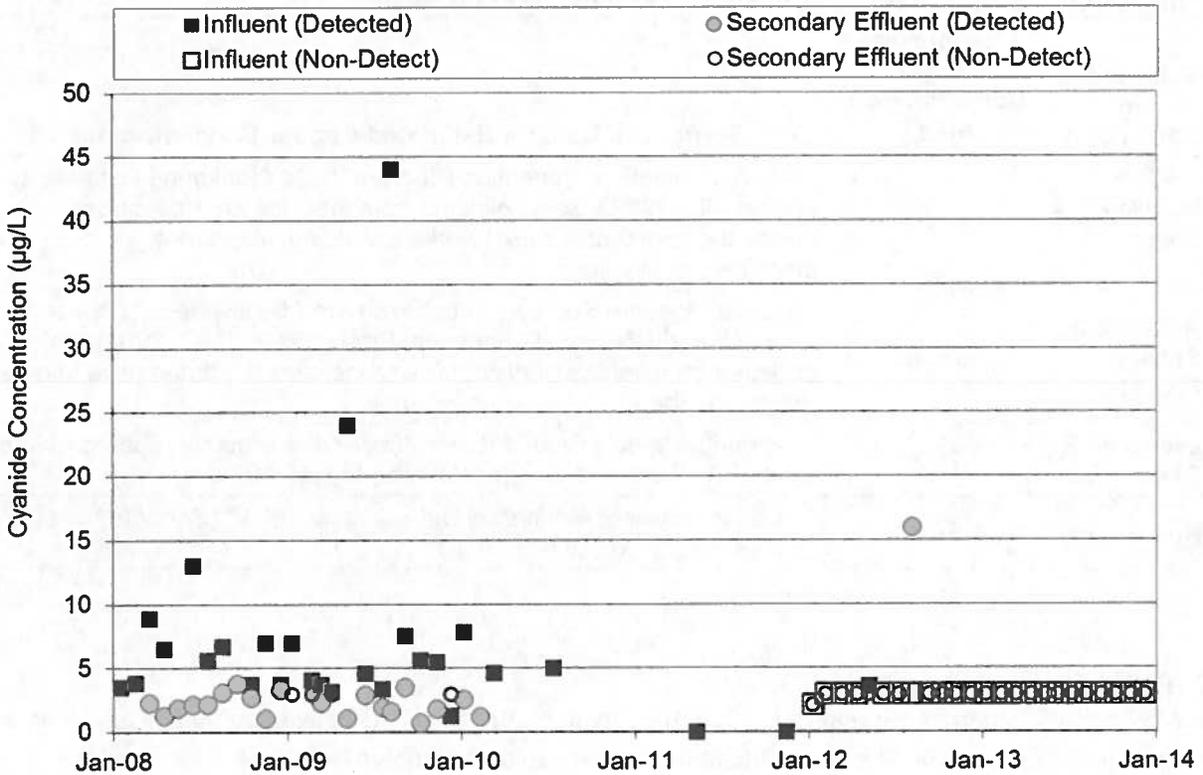


Figure 2 Total Cyanide Concentrations Measured at the City of Richmond Treatment Plant 2008 to 2013

LEAD

The monitoring data reviewed did not indicate any violations. The City has two Significant Industrial Users that have detectible amounts of Lead in their Wastewater: Burlington Northern Santa Fe Railroad (BNSF), and Bay Area Rapid Transit (BART).

The City suspected that BART may be “slug discharging” from their “blow-pit” maintenance area. So in July 2013, the City deployed a 24-hour composite sampler for several days. After receiving the monitoring results for the discharge during this sampling period, it was discovered that they had discharged a “slug” load of heavy metals (Copper, Lead and Zinc).

The City issued an Enforcement Action against BART and required that they cease discharging from this process line area until further notice. It is possible that this could have occurred during other elevated levels as well. The final effluent limits for Lead are shown in Table 5.

Influent and effluent monitoring results for Lead from 2008 through 2013 are shown in Figure 3.

Table 5. Effluent Limits for Lead

Pollutant	2013 Average Monthly Effluent (µg/L)	WQO (µg/L)
Lead	0.36	8.5

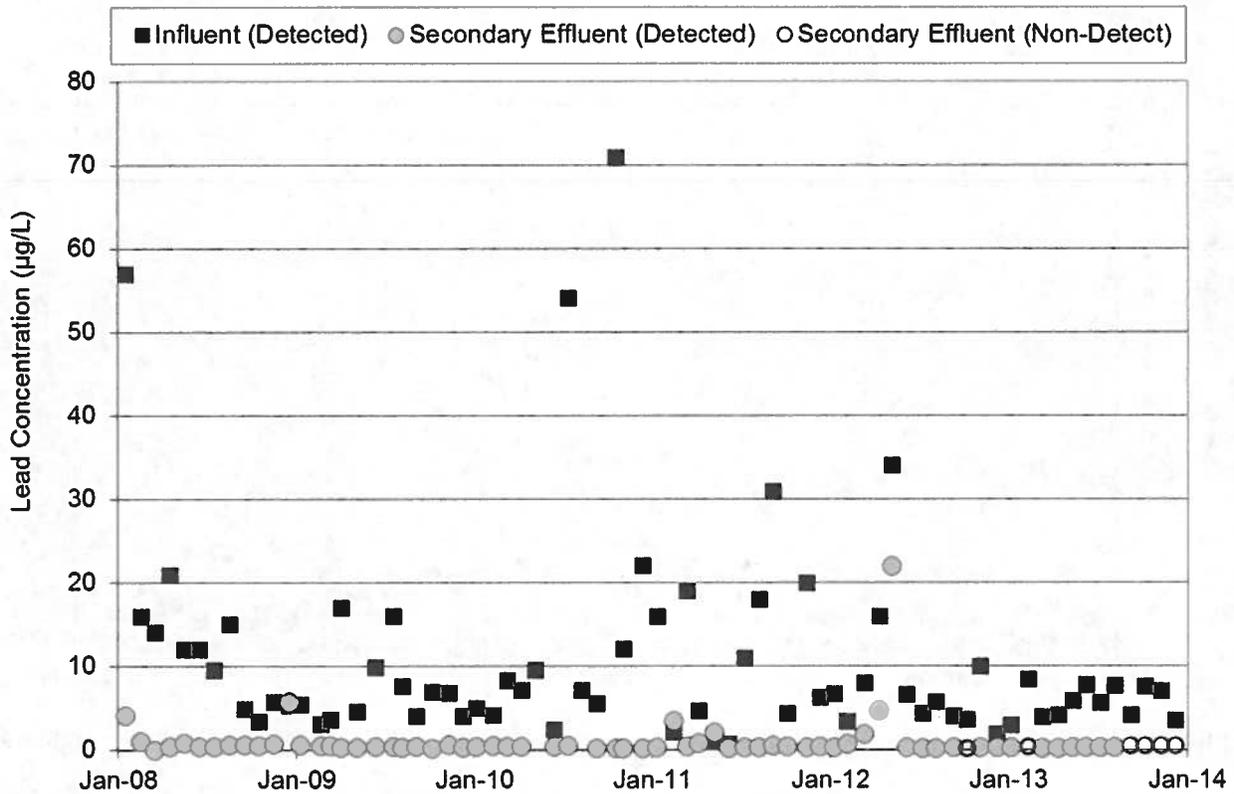


Figure 3 Total Lead Concentrations Measured at the City of Richmond Treatment Plant 2008 to 2013

MERCURY

Mercury is a regional pollutant of concern and the Mercury-PCBs Watershed Permit was re-issued in 2012 (Order No. R2-2012-0096) to address all municipal and industrial wastewater discharges of mercury to the San Francisco Bay. The City is a Permittee and subject to the effluent limits shown in Table 6. The Mercury-PCBs Watershed Permit also specifies triggers for additional mercury control. If the average monthly concentration exceeds 41 ng/L or the maximum daily concentration exceeds 65 ng/L, the City must conduct accelerated sampling and implement an “Action Plan for Mercury Reduction.”

Table 6. Effluent Limits for Mercury (Based on Order No. R2-2012-0096)

Pollutant	Average Monthly Effluent Limit (µg/L)	Average Weekly Effluent Limit (µg/L)	Annual Loading (kg/yr)
Mercury	0.066	0.072	0.23

Total Mercury concentrations measured in the influent and effluent at the plant from 2008 through 2013 are shown in Figure 4. The City's effluent discharges were well below the effluent limits and triggers.

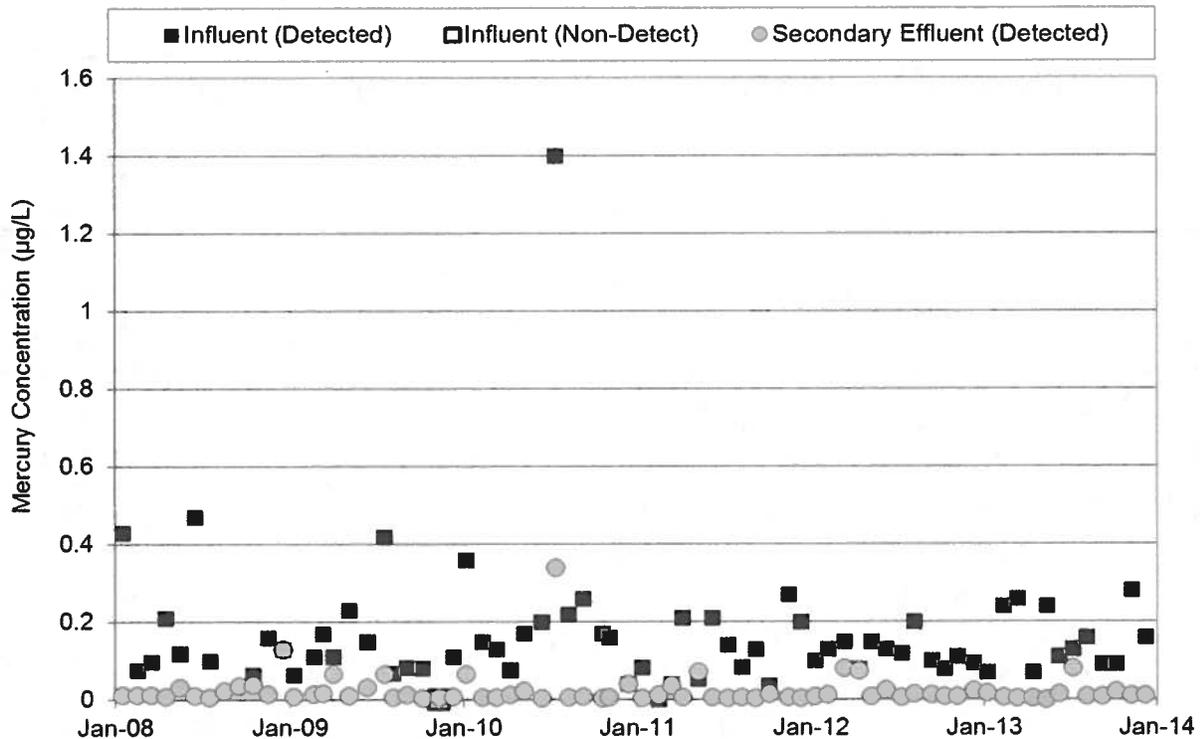


Figure 4 Total Mercury Concentrations Measured at the City of Richmond Treatment Plant 2008 to 2013

Dental practices, medical facilities, and vehicle services facilities were inventoried by the City as possible sources of mercury. There are currently twenty-one (21) Dental Facilities, Sixty-one (61) Vehicle Service Facilities and two (2) Medical Facilities (hospital-type) connected to the sanitary sewer.

The frequency of inspections for these businesses is shown in **Table 7**. Dental offices are considered the most significant commercial source of Mercury in the City.

Table 7. Commercial Sources of Mercury and Frequency of Inspections

Businesses in Richmond	Facilities in Richmond Sewer District	Frequency of Inspection
Dentists	21	Once every two (2) years
Vehicle Service Facilities	61	Once every three (3) years
Medical Facilities	2	Annually

NICKEL

The City requires several of its Industrial Dischargers self-monitor for Nickel per their discharge permit. There were no reported violations for Nickel in 2013. The City will review its Industrial Discharger

database for any additional information or potential sources of Nickel and will modify their Industrial Discharger's permits as needed. The final effluent limits for Nickel are shown in **Table 8**.

Total Nickel concentrations measured in the influent and effluent at the plant from 2008 through 2013 are shown in **Figure 5**.

Table 8. Effluent Limits for Nickel (Based on Order No. R2-2013-0016)

Pollutant	Average Monthly Effluent Limit (µg/L)	Average Weekly Effluent Limit (µg/L)	WQO (µg/L)
Nickel	34	59	13

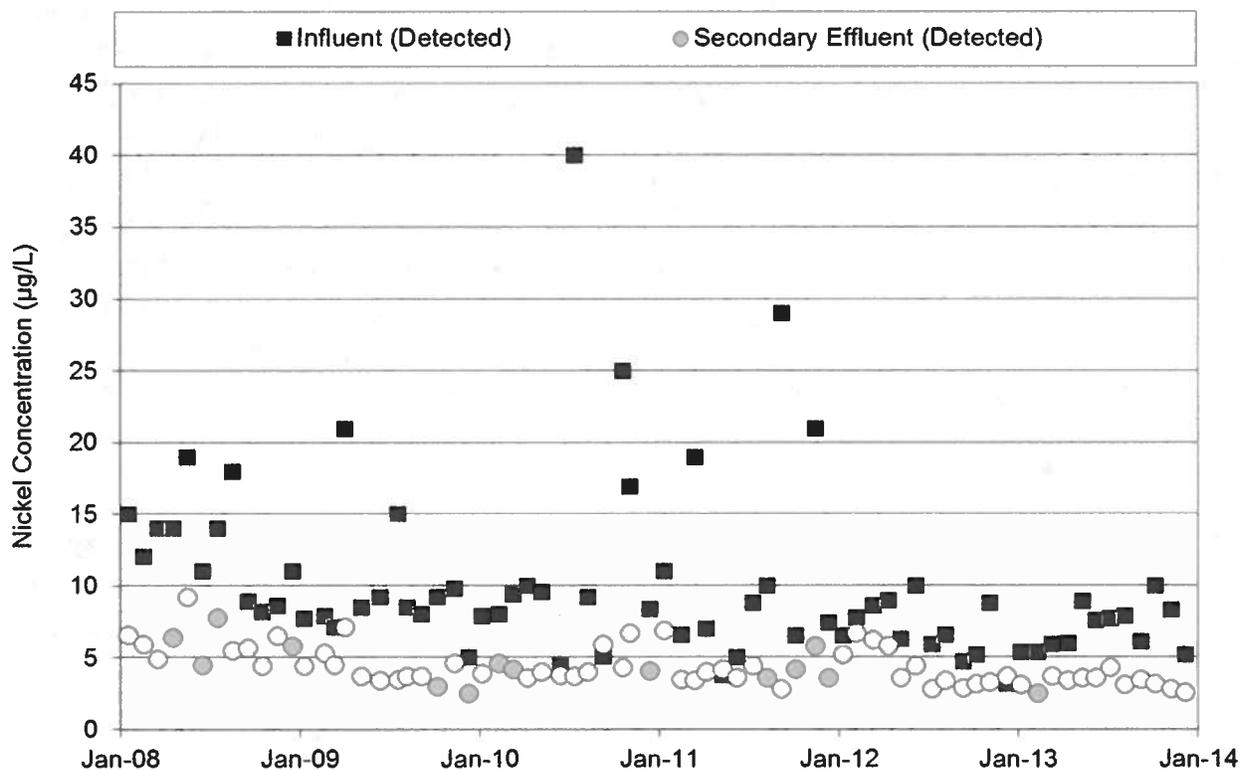


Figure 5 Total Nickel Concentrations Measured at the City of Richmond Treatment Plant 2008 to 2013

OIL AND GREASE

The City has identified Fats, Oil and Grease (FOG) as a pollutant of concern in order to remain vigilant in minimizing sanitary sewer overflows. The City has identified 154 Food Handling Facilities (FHF) as possible sources. This includes: Restaurants, Grocery Stores, Delicatessens, Fast Food chains, etc.

The oil and grease limits for treated effluent are presented in **Table 9**. All effluent samples collected from 2008 through 2013 were at or below the sample method detection limit of 5 mg/L.

Table 9. Effluent Limits for Total Oil & Grease

Pollutant	Average Monthly Effluent Limit (mg/L)	Maximum Daily Effluent Limit (mg/L)
Oil & Grease	10	20

TOTAL PCBs

Total PCBs is a regional pollutant of concern and was added to the City's Pollution Prevention Program in April 2011 after adoption of Order No. R2-2011-0012 (the PCBs amendment to the Mercury Watershed Permit).

In 2012, the Mercury-PCBs Watershed Permit was re-issued (Order No. R2-2012-0096) with the same effluent limits. The effluent limits for PCBs (as arochlors) are presented in **Table 10**. Analyses were conducted using EPA Method 608 and *all results were below the method detection limit*. Analyses were also conducted using EPA Method 1668c, in accordance with requirements specified in the Mercury-PCBs Watershed Permit.

Table 10. Effluent Limits for PCBs (as arochlors) (Based on Order No. R2-2013-0016)

Pollutant	Average Monthly Effluent Limit (µg/L)	Average Weekly Effluent Limit (µg/L)	WQO (µg/L)
Total PCBs (arochlors)	0.012	0.017	1.7×10^{-4}

3. Tasks to Reduce Sources and Implementation of Tasks and Goals

The City's pollution prevention program was initiated in 2007. At that time, the City developed a long term plan for source identification and control. Activities in 2012 focused on achieving a better understanding of cyanide sources. A discussion of the specific pollution prevention steps that were undertaken in 2013 for each POC is presented in the following subsections.

COPPER

In 2013, the City focused pollution prevention activities on other POCs because copper concentrations are below final effluent limits. The City continues to review monitoring results to address trends and ensure concentrations remain below the effluent limits.

CYANIDE

The business sector sources of cyanide in Richmond are metal finishers, metal fabricators, electroplaters, laboratories, pharmaceuticals, and organic chemicals (plastics and synthetic fibers manufacturers). All these are regulated by industrial waste permits and monitored for cyanide. Not all of what is measured as "cyanide" may come from industrial sources such as these.

There is some evidence that the presence of cyanide in monitoring samples could also be the product of sample preservation techniques. The City follows ongoing activities in the Bay Area regarding sample preservation and will apply those findings if practical.

The City continues to review monitoring results to address trends and ensure concentrations remain below the effluent limits.

LEAD

The business sector sources of Lead in Richmond are metal finishers, metal fabricators, electroplaters, laboratories, auto repair shops, vehicle service facilities and car washes. The businesses are regulated by industrial waste permits and monitored for lead. The City will review its Industrial User database as well as the Business License listing to determine if there could be any potential sources of lead which may be discharging to the POTW.

MERCURY

The City has already addressed dentists as the expected largest source of mercury to the Plant.

The City will inspect all twenty-one (21) Dentists currently listed with our Business License Department in 2014. (See Table 11)

Table 11 – Dental Facilities within RMSD

Facility Name	Voluntary Efforts	POTW Monitoring Methods
<i>Richmond Dental Building</i> <i>Dr. Chester T. Low</i> <i>Dr. Alma Carolina Blanco</i> <i>Dr. Theodore Shirai</i> <i>Dr. Reynaldo Bennett Wilson</i> <i>Dr. John Allen Gee</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Winning Smile Dentistry</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Kay Shen</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Paul Easton</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Maria Rodriguez</i> <i>Dr. Vilian Kossev</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Guadalupe Dental</i> <i>Dr. Teodoro William Icabalzeta</i> <i>Dr. Dani Laksana</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Robert Pearce</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Andre Abusleme</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Pai-Cheng Shen</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Macdonald Dental Center</i> <i>Dr. Shig Shinhira</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>West County Health Center</i> <i>Dr. Alma Clark</i> <i>Dr. Tina Sarvi</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>
<i>Dr. Xie Hong</i> <i>Dr. Kay Tak Shen</i> <i>Dr. Ngocan Hoang</i>	<i>Installation of Amalgam Separator</i>	<i>Annual inspection or survey</i>

Vehicle service facilities were identified as another potential source of mercury. Therefore the City developed and distributed BMP fact sheets that include activities to address mercury and copper contributions. The same instructions to cap drains and use dry cleanup methods that prevent copper from entering the collection system will also prevent mercury from entering the collection system.

All significant controllable sources of mercury have been identified and addressed. Therefore, the City focused pollution prevention activities in 2013 on other pollutants.

The City continues to look for opportunities to improve existing measures to control sources of Mercury. The City will continue to review its Industrial Discharger’s monitoring results as well the POTW effluent monitoring results to address trends and ensure Mercury concentrations remain below effluent limits.

NICKEL

In 2013, the City focused pollution prevention activities on other POCs because Nickel concentrations are below final effluent limits. The City will continue to review its Industrial Discharger’s monitoring results as well the POTW effluent monitoring results to address trends and ensure Nickel concentrations remain below effluent limits.

OIL AND GREASE

The City has had a comprehensive fats, oils and grease ordinance in place since 2006. Residential contributions of grease based sewer overflows continue to be a problem. Restaurants and other food preparation facilities are a problem in particular areas of the City.

When the City Collection System Crews alerts the Source Control Program to a grease problem the neighborhood (residential or commercial) is visited and outreach is conducted by direct contact or leaving a door hangers to announce the issue.

Following this procedure, thirteen (13) residential areas involving outreach activities to more than 560 homes were conducted. Staff also conducted outreach to four (4) industrial areas involving outreach to seventeen (17) businesses. In addition, City Staff also participated in several Public Events. (See Section, "Outreach to Employee and the Public").

The Collection System Crew provides FOG data Source Control Program on a monthly basis. Generally the FOG problems are greatest in the residential areas.

A total of 154 FOG inspections were conducted during this reporting period.

TOTAL PCBS

PCB'S were first sampled in stormwater drop inlets by the Contra Costa Clean Water Program near the old United Heckathorn site and the PG&E transformer station on Cutting Boulevard adjacent to Santa Fe Channel. Both of these facilities used PCB's in the past. The United Heckathorn site operated from 1947 through 1966 by various owners and manufactured pesticides. It was a Superfund, and remedial action was taken from 1990 through 1999. The PG&E transformer station stopped using and removed the onsite PCB's starting in the late 80's. Refer to the incorporated Stormwater Reports for updated efforts to target the source.

4. Outreach to Employees and the Public

The City holds an Annual "Public Works Employee Appreciation" luncheon on May 23, 2013. The Source Control staff uses this event to provide literature and information to all City Staff regarding the reduction of Pollutants in the Sanitary Sewer. This year's campaign slogan was, "FOG CLOGS – NO GREASE DOWN THE DRAIN". Staff distributed small notepads with this slogan printed on it with the intent that employees would be reminded of this every time they used the notepad. Approximately 425 employees attended the event.

The notepads (discussed above) are also distributed at our public counter to Residents and Contractors who come in for permits, assistance or general information. Staff distributed 680 notepads in 2013 to the general public. Staff will continue to distribute them until the supply (approximately 1,500 were ordered) is completely exhausted.

Two of our Source Control Inspectors participated in "Career Day" (May 16, 2013) at one of local Middle Schools. They discussed the importance of eliminating Pollutants in the Sewer, Illegal Dumping that occurs, and how they can be "Good Stewards" to prevent pollutants from being dumped in the sanitary and storm sewers. There were approximately 215 Students who attended the event and they were also given a "FOG CLOGS" notepad.

The City also provides FOG information on the City website, as well as information on the Mercury Thermometer Exchange Program (although this program did not have one person request an exchange in 2013).

also participated in the following Public Events distributing FOG information:

<u>Date</u>	<u>Name of Event or Public Meeting</u>
multiple	Green tours for middle school students (4 events)
multiple	Richmond Neighborhood Coordinating Council Meeting(s) (7 events)
02/13/13	Santa Fe Neighborhood Council Meeting
05/05/13	Cinco de Mayo – Distributed FOG brochures (Spanish translation) to 250 Residents
05/05/13	Bringing Back the Native Garden Tour
05/11/13	Baxter Creek restoration work day 5-11-13
05/13/13	Parchester Neighborhood Council Meeting
06/13/13	Point Richmond Neighborhood Council Meeting
06/22/13	Juneteenth
06/29/13	Asian Pacific Clean Fest
08/06/13	National Night Out
09/14/13	North and East Picnic
09/21/13	Coastal Clean-up
09/28/13	North Richmond Shoreline Festival
10/13/13	North and East Neighborhood Council Meeting
11/13/13	Richmond Heights Neighborhood Council Meeting

5. Discussion of Criteria Used to Measure Effectiveness

Influent and Effluent Monitoring: Influent and effluent monitoring are utilized to provide an indicator of overall effectiveness of the City's pollution prevention efforts.

There are currently 17,913 private laterals in the COR, approximately 271 miles in total length, and conservatively 30% (5,373 or 81 miles) of them are not operating properly allowing Inflow and Infiltration (I&I), and surface leakage.

The City implemented a Lateral Grant Reimbursement Program. Since the inception in 2008, the City has awarded 764 Lateral Grants to the residents of Richmond to replace their damaged laterals. This program has assisted with reducing I&I throughout the City.

6. Evaluation of Efforts and Progress

The City had a total of twenty-nine (29) reportable Sanitary Sewer Overflows (SSOs) in 2013. Seven (7) of those were due to fats, oils, and grease (FOG) blockages. There were forty-six (46) reportable SSOs in 2012. Four (4) of those reported in 2012 were due to fats, oils, and grease (FOG) blockages. It should also be noted that twenty-one (21) of the SSOs reported in 2012 were also reported during heavy storm events. So no statistics could be reported as to whether or not the line was actually blocked or had exceeded hydraulic capacity.

7. Plans for 2014

To address the pollutants of concern, the City plans the following activities in 2013:

COPPER

1. Continue to assess effluent monitoring results. As the City is currently meeting final effluent limits, it may not be necessary to continue pollution prevention outreach.
2. Distribute BMP fact sheets to new vehicle service and machine shop businesses as new businesses are established in the City.

CYANIDE

1. Continue to assess effluent monitoring results and follow ongoing activities in the Bay Area regarding sample preservation techniques.

LEAD

1. Continue to assess effluent monitoring results to determine compliance and trends in Lead concentrations.
2. Investigate potential sources of Lead within the service area

MERCURY

1. Continue to assess effluent monitoring results to determine the efficacy of outreach to dentists.
2. Distribute BMP fact sheets to dental offices, vehicle service facilities and machine shops as new businesses are established in the City.

NICKEL

1. Continue to assess effluent monitoring results to determine compliance and trends in Nickel concentrations.
2. Investigate potential sources of Nickel within the service area

OIL AND GREASE

1. Continue FOG outreach through information on City website, local cable television, and distribution of publication hand-outs at City Hall.
2. Continue with "FOG CLOGS – NO GREASE DOWN THE DRAIN" Campaign - distribution of notepads to local elementary and middle school events and at the public counter.
3. Conduct FOG outreach to businesses and residential areas if or when SSOs occur.

Total PCBs

1. Continue to assess effluent monitoring results to determine compliance and trends in PCB concentrations.
2. Investigate potential sources of PCBs within the service area.

Table 12 includes a summary of the City's accomplishments in 2013 and goals for 2014.

Table 12. City of Richmond's Pollution Prevention Program Accomplishments and Goals

Pollutant of Concern	Task	2013 Actions	2014 Goals
Copper	Maintain compliance with final copper effluent limits	Reviewed and assessed monthly effluent monitoring data while discharging to the San Francisco Bay.	Continue to review and assess effluent monitoring results.
Cyanide	Maintain compliance with final cyanide effluent limits.	Reviewed and assessed monthly effluent monitoring data while discharging to the San Francisco Bay. Followed ongoing activity in the Bay Area regarding sample preservation.	Continue to review and assess effluent monitoring results. Follow activities regarding sample preservation and apply if practical or needed.
Mercury	Maintain compliance with mercury effluent limits.	Reviewed and assessed monthly effluent monitoring data' while discharging to San Francisco Bay. Conducted outreach to commercial businesses.	Continue to review and assess effluent monitoring results Ensure that Dentists are maintaining Mercury Amalgam separators.
FOG	Reduce discharge of FOG to sanitary sewer to prevent SSOs	Continued outreach through pamphlets, commercials, and information on website	Continue outreach through pamphlets, educational programs, and information on website
Total PCBs	Maintain compliance with Total PCBs effluent limits.	Reviewed and assessed monthly effluent monitoring data while discharging to the San Francisco Bay.	Continue to review and assess effluent monitoring results. Investigate possible sources of PCBs in the sewer system service area.

Signatory Statement

"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."

Signature: Chad Davison Submittal Date: 2/28/13

Signatory Authority: Chad Davison General Manager
(name) (Title)