

# Pretreatment Compliance Audit

## Final Summary Report

**Discharger:** Malaga County Water District  
NPDES Permit No. CA0084239  
Order No. R5-2008-0033

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## 1. Executive Summary

This report includes several requirements and recommendations to enhance the operations of the Malaga County Water District's (District's) pretreatment program. The District is required to do the following:

- Conduct a local limits evaluation and develop local limits as necessary.
- Modify its draft sewer use ordinance (SUO) to include the federal definition of significant noncompliance (SNC).
- Revise its draft SUO to ensure that all of its definitions meet at least the requirements of the respective federal definitions.
- Amend its draft SUO to include at least the federal definition of *industrial user*.
- Ensure that the prohibitions on wastewater discharges listed as specific prohibitions in the District's draft SUO are at least consistent with the specific prohibitions listed in the federal regulations.
- Develop and implement procedures to identify and locate all possible industrial users that may be subject to the District's pretreatment program.
- Issue permits to industrial users (IUs) discharging industrial wastewater to the sanitary sewer to ensure compliance with applicable pretreatment standards and requirements.
- Ensure that wastewater discharge permits are not expired and are re-issued in a timely manner.
- Ensure that wastewater discharge permits are issued to permittees before the permit's effective date.
- Include an adequate description of sampling locations in wastewater discharge permits.
- Update wastewater discharge permits to reference the most recent version of the SUO.
- Modify wastewater discharge permits to include the effluent limits for parameters which the facility is expected to comply.
- Modify wastewater discharge permits to include the notification of bypass statement.
- Ensure that compliance sampling activities are conducted at significant industrial users (SIUs) a minimum of once per year.
- Ensure that facilities are adequately evaluated for the need to develop a slug discharge control plan and ensure that these plans are developed if applicable.
- Evaluate processes at the permitted facilities to ensure that harmful chemicals do not enter the sanitary sewer.
- Ensure that monitoring locations are representative of a facility's daily operations and representative of the industrial wastewater processes performed at the facility.
- Adequately request, receive, and analyze reports submitted by the IUs.
- Develop and implement an Enforcement Response Plan (ERP).
- Ensure that IUs are notifying the District within 24 hours of becoming aware of a violation.
- Take appropriate enforcement action against violations of discharge limits from permitted facilities.

- Calculate a number of IUs in SNC if applicable, and publish the list of those users in a newspaper of general circulation.
- Maintain records of IU monitoring activities and results.
- Evaluate its resources to ensure that the pretreatment program is adequately managed.

Several recommendations for the District are also provided. It is recommended that the District:

- Develop a pharmaceutical take-back program, dental mercury program, and fats, oils, and grease (FOG) management program.
- Discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with any industrial laundries that come into the District's jurisdiction in the future.
- Conduct Internet searches, utilize the EPA's Envirofacts Web site, and develop a line of communication with the local fire department or CUPA in an effort to identify potential nondomestic dischargers.
- Include more detail about the facility inspections in the inspection reports.
- Conduct follow-up inspections to ensure that secondary containment structures are adequate in containing spills or leaks.
- Understand how pretreatment systems operate at facilities and ensure that operation and maintenance manuals or other standard operating procedures are developed for these pretreatment systems.
- Ensure that facility diagrams are adequate and up-to-date.
- Request that facilities remove valving which may allow a facility to bypass its pretreatment system or ensure that standard operating procedures are in place pertaining to the operation and purpose of the valving.
- Include information about chemical storage and floor drains on the form pertaining to the facility's need to develop a slug discharge control plan.
- Develop a system for documenting and filing information for the pretreatment program and that the District maintain documents separate from the Contract Engineer.
- Develop education and outreach materials for the public about pollution prevention activities.
- Develop a clean, organized, and specific written agreement with contractors.

## 2. Introduction

The Central Valley Regional Water Quality Control Board (Central Valley Water Board), with assistance from PG Environmental, LLC, conducted a pretreatment compliance audit (audit) of the Malaga County Water District's (District's) Industrial Pretreatment Program (IPP) on January 6–7, 2014. The last inspection of the District's pretreatment program was performed in February 2010. In association with the 2010 inspection, the District was issued a notice of violation (NOV) on September 6, 2013 from the Central Valley Water Board. The District responded to the NOV on November 30, 2013. The response was received by the Central Valley Water Board on December 4, 2013. The NOV response provide the Central Valley Water Board with an update on the District's

status with respect to the NOV and included a response to the 2010 inspection. This response to the NOV also stated that the District would provide a complete response to the Central Valley Water Board by February 28, 2014. This report describes the primary concerns generated by the recent audit.

The files of five Class I non-residential dischargers and one Class II non-residential discharger were reviewed during the audit to provide a general overview of the District's pretreatment program:

- Air Products and Chemicals, Inc. (Class I non-residential discharger).
- PPG Industries (Class I non-residential discharger).
- Rio Bravo Fresno (Class I non-residential discharger).
- RockTenn CP, LLC (Class I non-residential discharger).
- Safety Kleen Systems, Inc. (Class II non-residential discharger).
- Stratas Foods (Class I non-residential discharger).

Onsite inspections were conducted at Air Products and Chemicals, Inc., American Warehouse Co., Inc., Fresno Truck Wash, Inland Star Distribution Centers, PPG Industries, Greentec, and Stratas Foods as a component of the audit.

## **2.1 Size of Program**

The Board of Directors for the District (Board of Directors) is responsible for implementing the District's IPP. At the time of the audit, the District representative (President of the Board of Directors) had recently been assigned as the pretreatment program contact due to the retirement of the District general manager, who was the previous pretreatment program contact. The District's IPP is implemented with the assistance of a District Code Enforcement Inspector and the District's Contract Engineer.

The District representative stated that the District's pretreatment staff manages a program consisting of approximately 275 nondomestic dischargers. The District has classified five of the dischargers as SIUs as defined by Title 40 of the *Code of Federal Regulations* (CFR) section 403.3(v); no SIUs are classified as categorical industrial users (CIUs). The other 270 nondomestic dischargers include truck washes, automotive repair shops, distribution centers, food service establishments (FSEs), and other commercial industries. The majority of the wastewater discharged to the wastewater treatment plant (WWTP) is from industrial users.

The District representative stated that the District does not accept hauled waste or remediated groundwater at the District's WWTP.

## **2.2 Description of the District's Wastewater Treatment Plant**

The District owns and operates one WWTP with a total design flow capacity of 1.2 million gallons per day (mgd). The wastewater received at the District's WWTP is comprised of 93% industrial wastewater and 7% domestic wastewater. The secondary and tertiary treatment systems at the WWTP consist of three screw pumps (one in service at a time), a barminutor, an aerated grit chamber, a flash mixing box, a flocculation tank,

one primary dissolved air floatation unit, three activated sludge aeration tanks, two aerobic sludge digesters, a sludge thickening tank, three secondary clarifiers, a “fuzzy” filter, and ultraviolet disinfection. The secondary wastewater from the WWTP is discharged to evaporative/percolation ponds. The District representative stated that if the ponds are full, the wastewater goes through tertiary treatment and is discharged to the Central Canal. The Central Canal is hydraulically connected to Fresno Slough, which drains to the San Joaquin River during periods of heavy rain.

## **2.3 Focus Topics**

The following topics regarding other industrial pretreatment activities were discussed with the District representative.

### **2.3.1 Significant Noncompliance**

The President of the District’s Board of Directors and the District’s Contract Engineer are responsible for calculating the number of SIUs in significant noncompliance (SNC) by hand.

The District’s definition of SNC included in the draft sewer use ordinance (SUO) varied significantly from the federal definition. Following discussions with the District representative, it was determined that the representative was unsure of the definition of SNC and whether any of the IUs were in SNC in 2013. This was later discussed with the District’s Contract Engineer, who stated that none of the District’s IUs were in SNC for the last calendar year. For more information about the definition of SNC, refer to section 5, Legal Authority, and section 10, Enforcement, of this audit report.

### **2.3.2 Pharmaceutical Recovery**

The District representative stated that the District does not have a formal pharmaceutical recovery program. The District representative also stated that the District does not provide public outreach or education about the proper disposal of pharmaceutical wastes.

It is recommended that the District develop a pharmaceutical take-back program and expand its outreach to senior care centers, hospitals, and pharmacies. Successful take-back programs have been implemented in California’s San Francisco Bay Area by the Bay Area Pollution Prevention Group (BAPPG); the U.S. Environmental Protection Agency (EPA) considers the BAPPG programs to be model systems.

### **2.3.3 Dental Mercury**

The District does not have a formal dental mercury program. The District’s local limit for mercury is 0.2 parts per million (ppm). The District representative was unsure if the District had a National Pollutant Discharge Elimination System (NPDES) permit limit for mercury.

The District did not provide data or information to the audit team regarding the mercury concentrations of the WWTP’s influent, effluent, or sludge. It is recommended that the District review data pertaining to mercury concentrations of the WWTP’s influent, effluent, and sludge in order to determine if these concentrations are decreasing.

increasing, or remaining unchanged. Furthermore, it is recommended that the District develop a dental mercury program. The District should begin by identifying the dental facilities in its service area, followed by investigating dental practices pertaining to their handling of dental mercury and amalgam. The American Dental Association serves as an informational resource and provides best management practices pertaining to the management and disposal of dental mercury and amalgam.

#### **2.3.4 Industrial Laundries**

The District representative stated that the District does not have industrial laundry facilities within its service area. It is recommended that the District discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with any industrial laundries that come into the District's jurisdiction in the future. SDSI is a voluntary program to commit to the use of safer surfactants. Safer surfactants are those which break down quickly to non-polluting compounds, therefore helping to protect aquatic life in both freshwater and salt water. Nonylphenol ethoxylates (NPEs) are an example of a surfactant class that does not meet the definition of a safer surfactant.

#### **2.3.5 Performance Measures**

The District representative stated that the District does not have a formal fats, oils, and grease (FOG) management program. However, the District does issue permits to FSEs and has conducted inspections at these establishments in the past. The District representative stated that a few FSE inspections were conducted in 2013, but the District does not document these inspections or have a set schedule for conducting FSE inspections. The District representative stated that the District does not distribute information to the public on proper disposal of FOG wastes. Section 3.05.180, Fats, Oils, and Grease (FOG) Control Program of the District's draft SUO states that FSEs or other users shall not discharge FOG, which may accumulate and cause a blockage, to the POTW. The District's Contract Engineer reported that no sanitary sewer overflows occurred in the last calendar year, to the best of his knowledge.

In addition, according to the State Water Board Order WQ No. 2006-0003, there is a requirement that POTWs enrolled under the General Order evaluate its service area to determine if a FOG program is needed. Therefore, it is recommended that the District continue to develop and implement its FOG control program and provide public outreach about the proper disposal of FOG waste. A component of the FOG program should also include working with FSEs to ensure that FSEs have adequate grease removal devices that are properly maintained in order to protect the District's POTW. In addition, it is recommended that the District develop a schedule for conducting FSE inspections and document these inspections.

#### **2.3.6 Potential Cleanups or Criminal Violations**

The District was unaware of any facilities that might close and leave a cleanup needing public funding. The District has not identified any facilities that appear to have knowingly violated a pretreatment or other environmental requirement.

### **3. Pretreatment Program Modifications**

The federal pretreatment regulations at 40 CFR 403.18 require the District to notify the Central Valley Water Board of any modifications it intends to make to its pretreatment program. The District representative stated that the District and Board of Directors were currently in the process of modifying the SUO. As a component of the audit, the District's draft SUO (Ordinance No. 2013-1) was reviewed. Section 5, Legal Authority, of this report provides an overview of the status of the draft SUO.

### **4. Local Limits**

The federal pretreatment regulations at 40 CFR 403.5(c) require POTWs to develop and enforce specific limits to implement the general and specific prohibitions of 40 CFR 403.5(a) and (b). The pretreatment regulations also require POTWs to continue to develop these local limits as necessary and to effectively enforce these limits. The District representative stated that the District's local limits were based on a list of required federal pollutants of concern.

According to the federal regulations at 40 CFR 403.5(c), Each POTW developing a POTW Pretreatment Program shall develop and enforce specific limits to implement the general and specific prohibitions at 40 CFR 403.5(a) and (b). Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce these limits. During discussions with the District representative and the District's engineer, it was determined that technically based local limits had not been developed to protect the POTW from general and specific prohibitions listed in the federal regulations. Furthermore, the District could not provide documentation stating that the District had performed a formal local limits evaluation to determine pollutants of concern. The District is required to perform a local limits evaluation and develop local limits as necessary, in order to protect the POTW as stated in the federal regulations at 40 CFR 403.5(c).

### **5. Legal Authority**

The federal pretreatment regulations at 40 CFR 403.8(f) require every POTW subject to the national pretreatment program to have the necessary legal authority to apply and enforce sections 307(b) and (c) and section 402(b)(8) of the Clean Water Act. As noted previously, modifications to the District's SUO were being finalized at the time of the audit. The audit team requested a "redlined" version of the SUO so the audit team could compare the updated SUO to the previous SUO to determine what modifications had been made. The District was unable to provide this documentation to the audit team.

According to the 2010 inspection report, District personnel indicated that the District had not revised its SUO to incorporate the required streamlining provisions. Therefore, the District was required to review its SUO and to incorporate the required streamlining provisions into its legal authority as soon as possible. In response to this requirement, the District stated that District personnel, legal counsel, and the Contract Engineer reviewed the streamlining provisions, definitions, and necessary modifications in accordance with 40 CFR 403.12(g). An updated SUO had been prepared for review and adoption by the

District. The District also stated that a draft SUO had been prepared by District staff and would be submitted to the Central Valley Water Board by November 30, 2013. The District anticipated that the new SUO would be adopted in January 2014.

As a component of the 2014 audit, the District's draft SUO and associated streamlining provisions were discussed. The District's Contract Engineer stated the draft version of the SUO included the required streamlining provisions. However, it was determined that the draft version of the SUO did not include the full definition of SNC; therefore, it was unclear if the District had adopted the revised SNC definition as a streamlining change. Section 1.03.010 of the draft SUO stated the following for the definition of SNC: "shall have the same meaning as 40 CFR 403.3(f)(2)(viii), or as it may be amended." This is an incorrect citation for SNC in the federal regulations; in addition citing where to find the regulation is not an adequate definition. The federal definition of SNC is stated at 40 CFR 403.8(f)(2)(viii)(A–H). The District shall amend its draft SUO to include the actual definition of SNC so that the District employees and IUs alike understand what would place a facility in significant noncompliance. The District is required to modify its draft SUO to include at least the federal definition of SNC as stated at 40 CFR 403.8(f)(2)(viii)(A–H) of the federal regulations. In addition, the District is required to ensure that the draft version of the SUO is modified to include the required streamlining provisions.

According to the 2010 inspection report, the inspector noted an inconsistency in how the District was applying the Class I SIU classification. Therefore, the District was required to review its legal authority and either revise its SUO to include the additional delineation of a Class IB user or to reclassify all Class IB users as Class I users (SIUs). In response to this requirement, the District stated that it had reclassified all non-residential wastewater discharge permit holders as either Class I or Class II. This update was documented in the *Annual Pretreatment Report* for 2012 which was submitted to the Central Valley Water Board on February 28, 2013. The District also stated that permits for those users previously identified as Class 1B would be forwarded to the Central Valley Water Board in September 2013.

As a component of the 2014 audit, the District's draft SUO was reviewed and it was determined that the document did not include a definition for "Class IB users." During conversations with the District representative and the Contract Engineer, it was stated that the District considers significant dischargers as Class I dischargers, and Class I permits have a one-year duration. Subsequently, the District identified Class II dischargers as all other permit holders, with permits renewed on a 2–3 year cycle. The delineation between Class I and Class II dischargers was not provided in the District's draft SUO. If the District intends to have two classes of dischargers, then it is required to revise its draft SUO to include a definition and explanation of each class.

According to the 2010 inspection report, the inspector conducted a cursory review of the District's SUO (Ordinance No. 01-13-2004) and noticed that its definition of *slug discharge* was inconsistent with the federal definition at 40 CFR 403.8(f)(2)(vi). Therefore, the District was required to review its SUO to ensure that all of its definitions are consistent with the respective federal definitions. In response to this requirement, the

District stated that the District, legal counsel, and Contract Engineer reviewed the definitions and made necessary modifications in accordance with 40 CFR 403.8 in October 2013. The District also stated that the required slug control requirements were part of the current SIU permit standard conditions issued to dischargers. The District also stated that a draft SUO update had been prepared by District staff and would be submitted to the Central Valley Water Board by November 30, 2013. It was anticipated that the new SUO would be adopted in January 2014.

As a component of the 2014 audit, the definition of *slug discharge* included in section 1.03.010 of the District's draft SUO was reviewed and compared to the definition stated in the federal regulations at 40 CFR 403.8(f)(2)(vi). It was determined that the District's definition of *slug discharge* is consistent with the definition provided in the federal regulations at 40 CFR 403.8(f)(2)(vi). However, a number of other inconsistencies were noted between the District's draft SUO and the federal regulations at 40 CFR 403. These inconsistencies are described below.

According to section 1.03.010 of the District's draft SUO, an *industrial user* is described as one that "shall have the same meaning as that term is defined in 40 CFR 403.3(l), or as it may be amended." However, the definition located at 40 CFR 403.3(l) is the definition of the term *National Pretreatment Standard, Pretreatment Standard, or Standard*, not the definition of *industrial user*. The District is required to amend its draft SUO to at least include the federal definition of *industrial user*, which is provided at 40 CFR 403.3(j) of the federal regulations. Furthermore, the District is required to review its draft SUO to ensure that all of its definitions meet the requirements of the respective federal definitions.

As a component of the 2014 audit, the draft version of the District's SUO was reviewed for its consistency with the requirements at 40 CFR 403. According to the federal regulations at 40 CFR 403.5(b)(7), "Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems should not be introduced into a POTW." According to section 3.05.030(D) of the District's draft SUO, "noxious or malodorous solids, liquids or bases, which either singly or by interaction with other wastes, are capable of creating a public nuisance or hazard to life, may cause acute worker health and safety problems, or are or may be sufficient to prevent entry into a sewer for its maintenance and repair" shall not be introduced into the POTW. It was determined that the provision in the District's SUO pertaining to noxious material as a specific prohibition is not consistent with the federal regulations at 40 CFR 403.5(b)(7). The District is required to ensure that the prohibitions on wastewater discharges listed as specific prohibitions in the District's draft SUO are at least consistent with the specific prohibitions listed at 40 CFR 403.5(b) of the federal regulations.

## 6. Nondomestic Discharger Characterization

The federal pretreatment regulations at 40 CFR 403.8(f)(2) require POTWs to develop and implement procedures to identify and locate industrial users that may be subject to

the local pretreatment program. These procedures must also include proper categorization of all SIUs as defined by 40 CFR 403.3(v).

The District representative stated that water accounts are reviewed on a regular basis to identify potential nondomestic dischargers. In addition, the District conducts drive-by inspections in the service area while en route to other inspections in an effort to identify nondomestic dischargers.

The District representative stated that the District does not conduct Internet searches or refer to the EPA's Envirofacts Web site in an effort to identify potential nondomestic dischargers which may be subject to regulation by the District's pretreatment program. In addition, the District representative assumed that the local fire department or Certified Unified Program Agencies (CUPA) would refer suspicious activities which could possibly affect the pretreatment program to the District. However, the District stated that the pretreatment program had not developed a thorough line of communication with the fire department or CUPA. It is recommended that the District conduct Internet searches, utilize the EPA's Envirofacts Web site, and develop a line of communication with the local fire department or CUPA in an effort to identify potential nondomestic dischargers which may be subject to regulation by the District's pretreatment program.

According to the federal regulations at 40 CFR 403.8(f)(2)(i), the POTW shall develop and implement procedures to identify and locate all possible IUs which might be subject to the pretreatment program. In addition, 40 CFR 403.8(f)(1)(iii) requires contributions to the POTW by each IU to be controlled through a permit or other means. During initial conversations with the District representative, the Fresno Truck Wash facility was discussed. The District representative provided the audit team with a list of facilities that were monitored daily for electrical conductivity (EC), conducted, ultimately, for billing purposes. The District representative stated that the EC monitoring results indicated that the Fresno Truck Wash was discharging wastewater with high EC values to the sanitary sewer. This facility was not covered by a permit. As a component of the 2014 audit, the audit team visited the facility and verified that the facility was discharging wastewaters with significant pollutant loading to the sanitary sewer without a permit. The District is required to develop and implement procedures to identify and locate all possible IUs which might be subject to the pretreatment program as stated in the federal regulations at 40 CFR 403.8(f)(2)(i). The District is also required to control through permit, order, or similar means the contribution to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements as stated in the federal regulations at 40 CFR 403.8(f)(1)(iii).

## **7. Control Mechanisms**

To ensure compliance with applicable pretreatment standards, the federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii) require POTWs to control the discharges from nondomestic dischargers by use of control mechanisms (permits or other similar means). The control mechanisms for Air Products and Chemicals, Inc., PPG Industries, Rio Bravo

Fresno, RockTenn CP, LLC, and Stratas Foods were reviewed as a component of the 2014 audit.

### **7.1 Reissuance of SIU Permits**

According to the 2010 inspection report, the inspector could not find the 2009 Calpine permit. Therefore, the District was required to ensure that all SIUs are issued signed and final permits prior to the expiration of the previous permits. In response to this requirement, the District stated that SIU permits were reviewed, upon application by the permittee, yearly. If the applications are approved, a new permit is issued before the current permit expires. The District maintains copies of all active permits. In addition, the District stated that current copies of permits assigned to each SIU were included in the September 30, 2013 report to the Central Valley Water Board. The District also stated that it intends for the Board of Directors to review each SIU permit prior to issuance of the new permit. The District general manager, or other designee, issues the permits as directed by the District Board of Directors.

According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the District is to control, through permit, order, or similar means, the contribution to the POTW by each IU to ensure compliance with pretreatment standards and requirements. As a component of the 2014 audit, the IU permits were discussed. The District representative stated that SIU permits are renewed annually and other permits are renewed every two to three years. The District's Contract Engineer stated that the SIU permits were renewed annually so the permits and information stayed current and so the District is actively aware of their expiration date. At the time of the 2014 audit, the District representative informed the audit team that the SIU permits were expired. Therefore, the District's significant nondomestic dischargers were discharging to the District's sanitary sewer with expired (invalid) permits. The District representative stated that the recent retirement of the previous general manager had precluded the SIU permits from being renewed. The District representative and the Contract Engineer stated that the Board of Directors were meeting a week after the audit and would review and sign the new permits at that time. The District is required to ensure that IU permits do not expire before issuing updated permits in order to control the contribution to the POTW from each industrial user to ensure compliance with applicable pretreatment standards and requirements as stated at the federal regulations at 40 CFR 403.8(f)(1)(iii).

### **7.2 Permit Effective Date**

As required at 40 CFR 403.8(f)(1)(iii)(B)(1), permits must contain a statement of duration, not to exceed five years. During the 2014 audit, it was determined that the permits reviewed had an issuance date and an expiration date but did not have an effective date. Permits should be issued before their effective dates so that permittees are aware of their limitations, obligations, and requirements before they are held responsible for upholding those permit conditions. From the information provided on the permits, the audit team could not determine if permits were issued prior to becoming effective. Therefore, the District is required to implement the appropriate changes to ensure and document that the permits are issued before their effective date.

### **7.3 Sampling Location**

According to the 2010 inspection report, the permits reviewed did not specify the correct sampling points. Therefore, the District was required to revise each SIU permit to include a specific description of where the sampling point was located. In response to this requirement, the District stated that the SIU permits would be reviewed to confirm the designation of specific sampling points. In addition, the District stated that the specific locations of sampling points for SIUs are defined in the individual permit files.

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require POTWs to identify the sampling locations in control mechanisms (permits). As a component of the 2014 audit, the sampling locations listed in the permits were reviewed. Each of the permits reviewed stated that the permittee must monitor outfall 001. In addition, part 3.2(a) of the permits lists the measurement location as “001.” However, this measurement location is not defined, described, or depicted in the permits. In order to ensure that samples are collected at the correct locations, the District is required to include an adequate description of the sampling locations in the permits as stated in the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4). The audit team also recommends that the District develop diagrams or include photographs of the sampling locations in the permits to avoid any confusion. For more information about the sampling locations at the facilities inspected as part of the audit, refer to section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit.

### **7.4 Statement of Civil and Criminal Penalties**

According to the 2010 inspection report, the permits reviewed did not contain statements of applicable civil and/or criminal penalties. Therefore, the District was required to review all SIU permits to ensure that each SIU permit included a statement of applicable civil and/or criminal penalties. In response to this requirement, the District stated that the SUO had the appropriate civil and/or criminal penalty language; however, this was not referenced specifically in the SIU permits. The language was incorporated by reference to the existing SOU [sic]. In addition, the District stated that the District, legal counsel, and Contract Engineer reviewed specific language that has been proposed to be added to the individual permits. The draft language had been attached to the permits and would be submitted to the Central Valley Water Board in November 2013. The draft language was also incorporated with the SOU [sic] adoption anticipated for January 2014.

As a component of the 2014 audit, the permits were reviewed to determine if the appropriate modifications had been completed regarding the civil and criminal penalties statement. According to part 1.14 of the permit, “Failure to comply with any provisions of this permit, Ordinance 01-13-2004, or applicable State or Federal laws or regulations may result in ... (c) civil and/or criminal penalties.” However, the draft version of the SUO provided to the audit team by the District was Ordinance No. 2013-1. The District is required to update the SUO reference in the permits to the most recent version of the SUO.

## **7.5 Effluent Limits**

According to the 2010 inspection report, the iron limit in Calpine's permit was inconsistent with the limit established in the District's SUO. The iron limit in the permit was listed as 10 mg/L, but the SUO specified that the local limit for iron was 1 mg/L. Therefore, the District was required to revise Calpine's permit to include the iron limit established in its SUO. In response to this requirement, the District stated that the District, legal counsel, and Contract Engineer will review the limits identified in the SOU [sic] and the individual SIU permits. If exceptions to the SOU [sic] are not allowed, the necessary modifications to limits will be incorporated into the updated SOU [sic].

According to the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3), permits are required to include effluent limits. As a component of the 2014 audit, the RockTenn CP, LLC (formerly Calpine Corrugated, LLC) permit was reviewed. It was determined that the effluent limit for iron is not included in the RockTenn permit. However, according to part 3.2 of the facility permit, RockTenn is required to collect a grab sample for iron in June from measurement location 001. The District is required to amend the RockTenn permit to include the effluent limits for parameters with which the facility is expected to comply. The permits must include the effluent limits in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3).

## **7.6 Self-monitoring Requirements**

According to the 2010 inspection report, the permits reviewed contained inconsistent self-monitoring requirements. Therefore, the District was required to review all monitoring requirements to ensure that they were consistent throughout each permit. In response to this requirement, the District stated that the current SIU permits contain consistent monitoring requirements throughout. The District also stated that this item was addressed prior to the issuance of the NOV from the Central Valley Water Board. Current copies of permits assigned to each SIU were included in the report of September 30, 2013.

As a component of the 2014 audit, it was determined that part 3.2(a) of the permits reviewed stated the specific monitoring requirements for the user, including sample parameters, measurement location, frequency, and sample type. The audit team found the self-monitoring requirements in each permit reviewed to be consistent throughout the IU permit.

According to the 2010 inspection report, the permits did not clearly specify what types of samples must be collected for each pollutant. Therefore, the District was required to review all SIU permits to ensure that the appropriate sampling technique was clearly identified for each pollutant that the discharger was required to self-monitor. In response to this requirement, the District stated that the sample type and frequency were contained in SIU permits in Part 3—Monitoring and Reporting Requirements. The District also stated that this item was addressed prior to the issuance of the NOV. Current copies of permits assigned to each SIU were included in the report of September 30, 2013.

As a component of the 2014 audit, the self-monitoring requirements included in the SIU permits were reviewed. It was determined that Part 3.2, Self Monitoring Requirements

included a sample type which was either listed as grab or continuous, in addition to a sampling frequency and measurement location. Part 3.2 of the SIU permits was deemed to be adequate as part of the 2014 audit.

### **7.7 Reporting and Notification Requirements**

According to the 2010 inspection report, the permits reviewed did not clearly specify all reporting requirements (i.e., signature requirements, certification requirements). Therefore, the District was required to review all SIU permits to ensure that all federal reporting requirements were clearly outlined in each SIU permit. In response to this requirement, the District stated that this item was addressed prior to the issuance of the NOV. The signature requirements and certification requirements were included in SIU permits Part 3—Monitoring and Reporting Requirements. In addition, the District stated that current copies of permits assigned to each SIU were included in the report of September 30, 2013. The District also stated that federal reporting requirements would be reviewed in October to determine if modifications were required. The proposed SUO required some revisions to the permit template.

As a component of the 2014 audit, the reporting and notification requirements for the permits were reviewed. It was determined that part 3.3(h) of the RockTenn permit requires that the permittee sign and submit reports with the required certification statement to the District.

According to the 2010 inspection report, the permits reviewed did not include the requirement to notify the District of a violation within 24 hours of becoming aware of the violation or the requirement to resample and submit the results of the resampling event within 30 days of becoming aware of a violation. Furthermore, the permits did not include the requirements to report slug loadings, spills, or bypasses. Therefore, the District was required to review all SIU permits to ensure that each permit specifically outlines the notification and resampling requirements upon becoming aware of a violation. In response to this requirement, the District stated that the required slug control and resampling requirements were now part of SIU permits in Part 4—Special Conditions.

The 2014 audit team found that part 4.2 (1 and 2), of the facility permits included the 24-hour violation reporting requirement and the 30-day resampling requirement. In addition, part 4.3 of the permit states that the permittee must immediately notify the District of spills, accidental discharges, slug loads, and slug discharges. However, the permits did not include statements requiring the permittees to notify the District in the event of a bypass. Therefore, the District is required to modify the permits to include the notification of bypass statement located at 40 CFR 403.17(a-c) of the federal regulations.

## **8. Application of Pretreatment Standards and Requirements**

The federal pretreatment regulations at 40 CFR 403.8(f)(1) require the District to have the legal authority to require compliance with applicable pretreatment standards and requirements and to ensure compliance with these standards and requirements through the use of control mechanisms such as permits. As previously stated, deficiencies and

inconsistencies were identified with the District's draft SUO during the 2014 audit. Refer to section 5, Legal Authority, for further information.

## **9. Compliance Monitoring**

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require a POTW to develop and implement an inspection and monitoring program to determine, independent of information supplied by nondomestic dischargers, compliance or noncompliance with applicable pretreatment standards and requirements. Furthermore, 40 CFR 403.8(f)(2)(vii) requires POTWs to investigate instances of noncompliance and to enforce the regulations as necessary.

### **9.1 Compliance Sampling**

The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be sampled at least once each year unless the POTW has authorized a CIU to forego sampling of a pollutant regulated by federal pretreatment requirements. In that case, the POTW must sample for the waived pollutant(s) at least once during the permit term [40 CFR 403.8(f)(2)(v)(A)]. The District representative stated that monthly EC samples are collected by the District at the SIUs.

According to the 2010 inspection report, the inspector did not find any documented sampling events conducted by the District. The District was required to revise its compliance monitoring procedures to ensure that it monitors each of the pollutants of concern listed in each SIU's permit at least once each year. In response to this requirement, the District stated that there is one primary pollutant of concern to the District, EC. As such, the District regularly monitors the EC levels from the SIUs. In addition, the District stated that details of the District's sampling activities were documented in the *Annual Pretreatment Report* for 2012 which was submitted to the Central Valley Water Board on February 28, 2013.

The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be sampled at least once each year unless the POTW has authorized a CIU to forego sampling of a pollutant regulated by federal pretreatment requirements. As a component of the 2014 audit, the Contract Engineer's files for the SIUs were reviewed for documentation of annual compliance sampling activities. The files reviewed during the audit showed that compliance sampling events for 2013 were not documented in the Rio Bravo, Stratas Foods, Air Products and Chemicals, or PPG Industries files. Therefore, it was determined that the District failed to conduct annual compliance sampling events at these facilities. The District is required to ensure that compliance sampling activities are conducted at SIUs a minimum of once each year as stated in the federal regulations at 40 CFR 403.8(f)(2)(v).

### **9.2 Compliance Inspections**

The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be inspected at least once each year, unless a discharger is subject to the reduced reporting requirements under 40 CFR 403.12(e)(3). The POTW must inspect those dischargers at least once every two years [40 CFR 403.8(f)(2)(v)(C)].

According to the 2010 inspection report, even though District personnel indicated that annual compliance inspections were conducted at each of the SIUs, the inspector did not find any documented inspection reports in the SIU files. Therefore, the District was required to revise its compliance inspections procedures to ensure that all compliance inspections are properly documented. In response to this requirement, the District stated that it has developed a “Facility Inspection Record” for documenting the results of any inspections. The documentation should be kept in the files associated with the permittee. The District completed annual inspections of the SIUs in October and November 2013 and the documentation of inspections was included in the submittal to the Central Valley Water Board in November 2013.

As a component of the 2014 audit, annual SIU compliance inspections were discussed. During initial conversations, the District representative was unsure who was conducting the inspections, but guessed that the District’s Contract Engineer was performing the inspections with occasional assistance from the Code Enforcement Inspector. In later conversations, the Contract Engineer stated that the Contract Engineer, with assistance from the Code Enforcement Inspector, conducted annual inspections at the five SIUs for 2013. Inspection reports were provided in the SIU files; however, the inspection reports were inadequate. The inspection forms were sparsely completed and lacked detail. For example, the inspection forms did not document process operations reviewed at the facilities, information about the sampling locations, or other pertinent information.

It is strongly recommended that the District include more detail about the facility inspections in the inspection reports. Details should include specific manufacturing processes, condition of the pretreatment system, discussions held, calibration details, and characteristics of facility effluent. The District’s inspection reports should capture the uniqueness of what was reviewed and discussed during each facility inspection.

### **9.3 Nondomestic Discharger Site Inspections Conducted during the Audit**

Six of the permitted nondomestic discharger facilities and one unpermitted facility were inspected as part of the audit. The following was noted during the nondomestic discharger site visits:

- *Air Products and Chemicals, Inc.* The facility produces pure oxygen and pure nitrogen through cryogenic air separation. The facility is located on the property of the adjacent PPG Industries facility and is contracted by PPG Industries to produce and provide oxygen and nitrogen for PPG Industries manufacturing processes.

Due to the complexity of the air separation processes, a brief inspection of the process area and wastewater generating practices was conducted. The production processes at the facility consisted of filtering and compressing ambient air; separating oxygen, nitrogen, and particulates; and re-vaporizing the oxygen and nitrogen for delivery to the adjacent PPG Industries facility.

The facility discharges treated condensate from air compressing activities and cooling tower blowdown to the sanitary sewer. The facility conducts pH adjustment of cooling tower blowdown water utilizing sodium hypochlorite and sulfuric acid and has a target pH range of 8.0–8.3 standard units. The facility representative stated the pH adjustment occurs within the cooling tower; therefore, the chemical dosing area could not be viewed during the site visit. A wastewater monitoring shed, located on the north side of the cooling tower, was visited as a component of the site visit. The monitoring shed was equipped with a control board for monitoring the data from the flow, pH, and electrical conductivity (EC) meters at the sample location.

During the inspection, cooling tower blowdown was observed in the secondary containment structure used for chemical storage. The plant superintendent stated that the majority of water evaporates; however, if too much accumulates in the secondary containment structure, he has the ability to pump the water back to the cooling tower. Due to the amount of cooling tower blowdown accumulated in the chemical storage's secondary containment structure, the containment capacity for a leak or spill of chemicals may not be adequate. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is appropriately sized for containing chemical spills or leaks so that it is serving its intended purpose (i.e., not to retain cooling tower blowdown).

In addition, the concrete secondary containment structure around the facility's wastewater treatment chemicals showed signs of deterioration. Specifically, the structure had numerous cracks and the corners of the structure were beginning to crumble. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is adequate for containing chemical spills or leaks.

- *American Warehouse Co., Inc.* The facility provided warehousing and transportation services for a variety of products from the agriculture and water treatment industries. The facility had multiple buildings with multiple rooms. None of these areas had 'wet' operations.

The facility offered warehouse and transportation services for a large variety of solid and liquid products (including crop protection products). The facility's employees were trained in handling hazardous materials. The facility had 412,000 square feet (sq. ft.) of storage area. The facility had seven 50,000 sq. ft. rooms that had the capacity to contain 106,000 gallons of spilled liquid or water used in extinguishing a fire. The facility also had a 37,000 sq. ft. flammable room (designed for the storage of flammable materials) contained in a separate building that had its own 70,000 gallons of liquid storage in case of an emergency. If the interior containment areas exceeded their holding capacity, they were designed to overflow into truck wells. The truck wells provided an additional 1.75 million gallons of storage. The facility had approximately 2.5 million gallons of storage capacity between the interior and exterior storage. The

facility had an additional holding pond (lined with bentonite clay) for emergency conditions which could store one million gallons of liquids.

The facility only discharges domestic wastewaters to the sanitary sewer. The facility does not have a pretreatment system. However, the facility does have 3.5 million gallons of containment capacity to store liquids from a major spill or waters contaminated with fire suppression chemicals in the event of a fire.

No deficiencies were noted during the site inspection.

- *Fresno Truck Wash.* The facility washes trucks, tankers, and trailers for a variety of different clients. An internet search provided a detailed list of services offered by the facility. The facility washed both the inside and outside of trucks, tankers, and trailers. The facility representative stated that petroleum product tankers were not being serviced.

The facility had two interior truck bays for conducting washing operations in addition to an office. The facility also had areas outside the washing bays that appeared to be used for other operations. One area in front of the facility had a vehicle lift system. The site inspection mainly focused on observing the process operations area from afar and understanding the operation of the pretreatment system.

The facility discharged pretreated wash waters from the truck washing operations to the sanitary sewer. The facility has been in the process of upgrading and redesigning its pretreatment system. The facility provided a piping and instrumentation diagram/drawing (P&ID) to the inspection team; however, the batch treatment tank was not included in this P&ID.

The pretreatment system receives flows via a floor trench system. The pretreatment system has the following assets operating in series: a batch treatment tank (4,500 gallons), an "EQ tank" (approximately 4,000 gallons), an aerated pH adjustment tank which the facility representative referred to as "AIR-1" (approximately 4,000 gallons), a pH adjustment system supporting the AIR-1 tank's operations, another aerated tank which the facility representative referred to as "AIR-2" (approximately 4,000 gallons), a third aerated tank which the facility representative referred to as "AIR-3" (approximately 1,200 gallons), a reaction tank with decant valving which was referred to as "RXN" (approximately 2,000 gallons), a polymer feed system supporting the RXN tank, two 50 micron bag filters (run in parallel), and a final discharge sump to the sanitary sewer. Solids that were removed from the pretreatment system's three hopper-bottomed tanks (batch treatment, EQ, and RXN) are discharged to a solids sump and pumped to the facility's dry beds. The attached photograph log contains photographs of the pretreatment equipment that were in use at the time of the inspection.

The pretreatment system had a lot of unlabeled piping. Some of the piping appeared to be designed for primary treatment processes, while other piping appeared to have been installed for additional flow options. In addition, there was not an operation & maintenance (O&M) manual for the pretreatment system. It is recommended that the District conduct a follow up inspection at the facility to understand how the pretreatment system works and encourage the facility to label the pipes and develop an O&M manual for the pretreatment system.

The piping and instrumentation diagram/drawing (P&ID) that the facility provided to the inspection team did not depict the 4,500 gallon batch treatment tank or solids management equipment (pump, piping, or drying beds) that were observed during the site inspection. It is recommended that the District conduct a follow up inspection at the facility to review and accurately depict the pretreatment system and sewer discharge locations in a facility diagram.

The facility representatives stated that they are working with consultants in order to evaluate what system will work best for the specific wastewater treatment needs at the facility. Various facility representatives participated in the inspection process at different times. The representatives were aware of the concerns associated with treating wastewaters generated at the facility. The facility representatives were calibrating the pH and conductivity meters. The inspection team strongly recommends that the District require the facility to develop and implement a formal written operations manual for the operation of the pretreatment system.

The pretreatment system was not housed within a secondary containment structure. If any of the pretreatment system assets were to fail or rupture, wastewaters would not be contained. The District has not required the facility to develop a slug discharge control plan to ensure that the occurrence of a slug discharge will be minimized during normal operations or clean-up procedures in the case of a failed pretreatment asset. The District is required to have the facility develop a slug discharge control plan to address a slug discharge that may occur under normal operational conditions or in the event of pretreatment system asset failure.

The District had not issued a permit to this facility at the time of the inspection. From the facility inspection, it was confirmed that wastewater with a significant pollutant loading was being generated and discharged from this facility to the sanitary sewer. According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the District is required to control through permit, order, or similar means the contribution to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements. Therefore, the District is required to permit this facility as part of the pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii).

- *Greentec*. The facility cleaned and washed 55-gallon drums in addition to large volume totes that were received from a variety of different companies (mostly

dairy related industries). The cleaning and washing processes included the removal of labels from the drums and totes and washing out the interior of the container.

The facility had a large interior washing and storage area. The storage area had approximately six rows of 250-gallon totes that had been cleaned. Each row varied in length and had between 4 to 6 stacks of totes. The typical stack was four totes high. The clean 55-gallon drums were also stacked and organized into blue and white drums areas. There were approximately 200 drums stacked in columns, three drums high. The areas immediately surrounding the stacked totes and drums were not inspected.

The facility discharges pretreated cleaning and wash waters from the drum and tote washing operations to the sanitary sewer.

The facility's pretreatment system consists of a 2,000 gallon three-stage clarifier, a paper filter unit, a pH adjustment system, two cartridge filters, four sock-type filters, three granular activated carbon (GAC) filters, and a 600 gallon holding tank system.

The paper filter unit had piping valves in two locations which would allow this unit to be bypassed. The valves were positioned at the time of the inspection to deliver wastewaters to the paper filter. The facility representatives stated that they do not use the bypass valving and would remove the valves if requested. The audit team strongly recommends that the District have the facility remove or lock out the bypass valve. If the bypassing capabilities are required for certain operating and maintenance conditions, then a written standard operating procedure shall be developed so that the pretreatment and quality of wastewater are not compromised.

- *Inland Star Distribution Centers.* The facility provides warehousing and transportation services for a variety of agriculture, chemical, auto supply, and food products. The facility had multiple buildings with multiple rooms and none of these areas had 'wet' operations.

The facility offered warehouse and transportation services for a large variety of solid and liquid products. The facility had employees that were trained to handle hazardous materials. The facility had four separate buildings that provided 385,000 square feet (sq. ft.) of storage. The facility also had areas designed for the storage of flammable materials. The facility's truck wells were incorporated into the storage spill management plan. The warehouses did not have floor drains to the sewer. The facility also had an additional holding pond for emergency conditions. The holding pond was lined with what appeared to be a black synthetic (observation was made through a fence, from approximately 15 feet away).

The facility discharges only domestic wastewaters to the sanitary sewer. The facility does not have a pretreatment system. The facility does have a large volume of containment capacity to contain liquids generated from a fire or major spill.

The facility representatives stated that the facility had a spill response plan. In response to the audit team's request to see the spill response plan, the facility representative stated that he would forward a copy if needed after the inspection. The representative was informed that the inspection report would require the District to formally review the spill response plan. The District is required to formally evaluate the facility for the need of a slug discharge control plan. The evaluation should include a formal review of the facility's operation plans.

The facility representatives stated that they provide a re-packing service. The re-packing service involved transferring bulk liquids or powders into smaller volume containers. The process is performed in an outdoor area, between two buildings, where there are no drains. The actual process was reported to be contracted out to subcontractors. The subcontracts are responsible for management of all wastes generated (wastes are not disposed of onsite). The District is required to formally evaluate the re-packing operations to ensure that waste generated from the re-packing process are properly managed and not discharged to the sewer system.

- *PPG Industries*. The facility manufactures flat glass using a float glass process. In addition, the facility sizes, cuts, packages, and ships the glass products in accordance with customer requests and specifications. At the time of the site visit, the facility was producing approximately 520 tons of glass per day.

Multiple process areas were observed during the site inspection:

- Compressor room—The compressor room housed four primary compressors used for facility operations. The facility representatives stated that each of the four compressors was connected to an individual oil/water separator, and had been since April/May 2013.
- Raw materials unloading area—The facility received various raw materials via railcar and truck. Railcars and trucks entered the southeast corner of the facility and unloaded the raw materials into storage silos. Raw materials maintained onsite included sand, limestone, dolomite, soda ash, cullet, and ferrous oxide. In addition, a 20,000-gallon caustic soda tank located within a concrete secondary containment structure was located in this area. The raw materials blending plant was also located in this area of the facility.
- Cooling towers and wastewater treatment—Cooling tower blowdown and boiler blowdown was adjusted for pH in this area of the facility. Wastewater operations were conducted and managed by a consultant, ChemTreat Services. A representative of ChemTreat Services was not

present to further discuss wastewater treatment operations during the site visit; however, the wastewater treatment system appeared to be properly operating at the time of the site visit. In addition, used oil and other spent chemicals were maintained in this area of the facility. The used oil and spent chemicals were stored in 55-gallon drums in a covered and contained area, adjacent to the wastewater treatment system.

- Scrubber—The facility operated a scrubber on the southwest side of the facility, adjacent to the furnace. The facility representatives stated that exhaust gas and particulates from the furnace were blown into the scrubber. Caustic soda and water were injected into the scrubber at multiple locations to capture the particulates. The caustic soda, water, and particulate flocculent solution dripped out of the bottom of the scrubber and were reintroduced into the mixed batches of raw materials.
- Float glass furnace—The facility representative explained that a mixed batch of raw materials from the blend plant is introduced into the furnace for the production of flat glass using a float glass process. The furnace is powered by oxygen (from the onsite Air Products and Chemicals, Inc. cryogenic air separation plant) and natural gas. The mixed batch is melted in the furnace and drawn out in the form of a viscous glass ribbon. The viscous glass ribbon is floated across a bath of molten tin and formed into various thicknesses and widths. The molten tin bath is constantly being replenished with tin. From the molten tin bath, the glass ribbon is hardened, sized, cut, packaged, and shipped per customer specifications and request.

The facility discharges pretreated compressor, cooling tower, and boiler blowdown water to the sanitary sewer. The facility conducts pH adjustment of facility cooling tower and boiler blowdown water. The facility hired a consultant, ChemTreat Services, to monitor and treat wastewaters generated at the facility. The facility representatives stated that the consultant visits the facility on a monthly basis in order to check the system and to discuss pump operation procedures with facility personnel who are responsible for operating the pumps. In addition, the facility maintenance department performs weekly inspections of the wastewater system to ensure proper operation and maintenance of the system. A representative of ChemTreat Services was not present during the site visit.

Each of four compressors located in the main compressor room is connected to individual oil/water separators. The facility representatives stated that the oil/water separators were installed in April/May 2013 and primarily receive compressor blowdown. It was undetermined by the EPA audit team whether the effluent from the oil/water separators is combined with pretreated cooling tower and boiler blowdown water, or if there was a separate connection to the sanitary sewer.

The EPA audit team observed an oil leak in the compressor room during the site inspection. The facility representatives stated that the oil leak was identified by the maintenance department earlier that day and was awaiting repair. The oil leak was contained to the compressor room. It is recommended that the District follow up with the facility to ensure that the leaked oil is properly disposed of and that the compressor leak is fixed.

The facility representatives stated that self-monitoring samples were collected at the facility's effluent lift station/discharge location. Samples are collected downstream of where the facility's wastewater comingles with wastewater generated at the onsite Air Products and Chemicals, Inc. plant. In addition, the facility representatives stated that the facility's domestic wastewater is tied into the facility's discharge line upstream of the effluent lift station/sampling point. Therefore, samples collected by the facility and District are not representative solely of the facility's industrial wastewater discharge. Furthermore, the facility representatives stated that the facility was unable to collect a representative sample of the facility's industrial wastewater discharge because the only accessible location to the discharge is considered as a confined space, and the facility does not allow its employees to enter confined spaces. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. It is required that the District reevaluate the facility's discharge monitoring location to ensure that self-monitoring samples are representative solely of the facility's industrial wastewater discharge.

After the site inspection, the EPA audit team along with the District code enforcement inspector visited the District's compliance sample collection location. The District collects compliance samples of the facility's discharge at a manhole located west of the facility at the intersection of South Willow Avenue and a railroad track. The manhole was downstream (and west) of the facility's effluent lift station and discharge location. As noted above in note 5, the facility's domestic wastewater along with industrial wastewater from the Air Products and Chemicals, Inc. plant are tied into the facility's discharge line, upstream of the effluent lift station and the District's sampling manhole. However, 40 CFR 403.12(b)(ii) state that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. It is required that the District reevaluate the District's compliance sampling monitoring location to ensure samples are representative solely of the facility's industrial wastewater discharge.

Part 3 Item 2(a) of the facility permit states that "the permittee must monitor outfall 001" for all required parameters. The permit does not include a description of the sampling location for "outfall 001." The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include a sampling location.

During the site visit, the EPA audit team was unable to determine if samples were being collected at the intended location due to the vagueness of the sampling location description in the permit. The District is required to include a detailed description of the facility sample location in the permit to ensure that samples collected for both compliance and self-monitoring purposes are collected at the same location in order to ensure consistency across collected samples.

- *Stratas Foods*. The facility receives various edible oils (e.g., vegetable, canola, soybean, corn, etc.) in liquid and solid form via railcar. The facility then repackages the oil into smaller containers and distributes it for the food service industry.

Two process areas at the facility were inspected during the site visit:

- Tank farm – The facility had eighteen 200,000-pound storage tanks grouped in a tank farm located inside the southwest portion of the facility. The tanks were used for bulk storage of the various edible oils that are repackaged at the facility. The tank farm had two trench drains with a communal sump that led to the facility’s pretreatment system. The trench drains received wash water from tank washing activities. Due to personal protective equipment requirements, the EPA audit team did not enter the tank farm.
- Production line – Product from the tank farm was piped to the production line and repackaged into customer-specific containers through a series of filling machines and conveyer systems. Product was being repackaged into one-gallon containers during the time of the inspection. Due to active production occurring, the EPA audit team briefly inspected this process area. Multiple floor drains were observed throughout the process area. Facility representatives stated that all floor drains in the production line area were gravity-fed to the facility’s pretreatment system.

The facility discharges pretreated floor and equipment sanitation wash waters and cooling tower blowdown to the sanitary sewer. The facility representatives stated that the vast majority of sanitation wastewaters generated at the facility are from floor washing activities and that only a very small amount of water is used to sanitize the equipment. All sanitation wastewaters generated at the facility are collected via floor and trench drains throughout the facility’s process areas.

The facility removes grease and oil from its wastewater utilizing a cavitation air flotation (CAF) aeration unit. Sanitation wastewaters and cooling tower blowdown are collected and received by a 12,000-gallon primary wastewater reservoir. Wastewater spills from the top of the primary reservoir into a central chamber. From there, it is pumped to the CAF unit where ejection nozzles inject ambient air into the wastewater to enhance the floatation of particles within the wastewater.

Polymers and flocculants are not used in the CAF unit to promote solids floating or settling. Floating solids are skimmed from the top of the wastewater that is passing through the flotation area of the CAF unit and pumped to what the facility representatives referred to as the “190” storage tank. The “190” storage tank is cleaned every six weeks. The solids from the tank are hauled offsite by a grease contractor.

Effluent from the CAF unit is returned to the primary wastewater reservoir. Once the facility is ready to batch discharge to the sanitary sewer, the wastewater from the primary wastewater reservoir (a combination of incoming wastewater from the facility’s process areas and wastewater that has been continually cycling through the CAF unit) is sent through the CAF unit one more time. Wastewater that does not meet the electrical conductivity (EC) threshold is sent to one of two additional 12,000-gallon reservoirs for storage and eventually for further treatment. If the wastewater effluent from the CAF unit meets the EC threshold at the unit’s effluent discharge location, the return valve that sends wastewater back to the primary reservoir is closed and the wastewater is discharged to the sanitary sewer. The facility batch discharges approximately 3,000–4,000 gallons at a time approximately three times each day.

The District’s code enforcement inspector stated that compliance samples are typically collected from the facility’s discharge line downstream of where the facility’s domestic wastewater was introduced. Therefore, the facility’s domestic wastewater has been diluting the facility’s industrial wastewater flow being sampled by the District. Self-monitoring samples have been collected from a sample port located after the CAF unit weir, but prior to the effluent discharge pipe. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. The District is required to ensure that compliance samples collected at the facility are representative of the facility’s industrial wastewater discharge for daily operations.

Part 3 Item 2(a) of the facility permit states that “the permittee must monitor outfall 001” for all required parameters. The permit does not include a description of the sampling location for “outfall 001.” The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include a sampling location. During the facility inspection, the EPA audit team was unable to determine if samples are being collected at the intended location due to the vagueness of the sampling description in the permit. The District is required to include a detailed description of the facility sample location in the permit so samples collected for both compliance and self-monitoring purposes are collected at the same location. This ensures consistency when collecting and analyzing samples.

#### **9.4 Requesting, Receiving, and Analyzing Reports**

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv) require the District to request, receive, and analyze all reports submitted by SIUs. In addition, the SIU reports must contain the information required at 40 CFR 403.12.

According to the 2010 inspection report, the District failed to identify all violations. The District was required to review its procedures for reviewing and analyzing reports submitted by its SIUs. The District was required to ensure that all violations are identified and enforcement actions are taken as specified in the District's enforcement response plan (ERP). In response to this requirement, the District stated that it documented details of its compliance and enforcement activities in the *Annual Pretreatment Report* for 2012, which was submitted to the Central Valley Water Board on February 28, 2013. In addition, the District stated that it had prepared an updated methodology to ensure that all violations are identified and enforcement actions are taken as specified in the ERP. The updated methodology was included in the draft SUO.

According to the federal regulations at 40 CFR 403.8(f)(2)(iv), the POTW is required to receive and analyze self-monitoring reports and other notices submitted by IUs in accordance with the self-monitoring requirements in 40 CFR 403.12. From the files reviewed as a component of the 2014 audit, it was determined that 2013 self-monitoring data for the RockTenn CP, LLC facility was not included in the facility file. The District is required to adequately request, receive, and analyze reports submitted by SIUs as stated in the federal regulations at 40 CFR 403.8(f)(2)(iv).

#### **9.5 Slug Discharge Control Plans**

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(vi) require the District to evaluate each SIU, either by October 14, 2006 or within one year of the facility's becoming an SIU, to determine whether the SIU needs to develop and implement a slug discharge control plan (SDCP). A slug discharge is any discharge of a non-routine, episodic nature, including an accidental spill or non-customary batch discharge [40 CFR 403.8(f)(2)(vi)]. The regulations also require an SIU to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge.

According to the 2010 inspection report, the District had not performed slug discharge evaluations at any of its SIUs. Therefore, the District was required to evaluate each of its SIUs to determine if any is required to develop and implement an SDCP. In addition, the District was required to document each of these evaluations. In response to this requirement, the District stated that in 2010, the District developed an "Evaluation of SIUs [sic] Need for a Plan to Control Slug Discharge" form. Each SIU was evaluated and it was determined that none of the SIUs required an SDCP at the time of the evaluation. These results were documented on the newly developed forms, which were filed in each SIU's folder. The District also stated that it had provided copies of the slug discharge evaluations for the SIUs in the September 2013 report submitted to the Central Valley Water Board.

During the 2014 audit, the District's Contract Engineer stated that in 2010 the District sent SDCP surveys to its SIUs. The SIUs were required to complete the surveys in order

for the District to determine if any SIU needed to develop and implement an SDCP. The District's Contract Engineer stated that none of the District's SIUs were required to develop SDCPs at the time of the surveys were completed. The District should be aware that solely relying upon the completion of the SDCP survey by the IU is not an adequate method to determine the need for an SDCP. The District should take the SDCP survey into account, but it is strongly recommended that the District make its determination based on site inspections and practices observed at the facility.

The Stratas file reviewed contained a two-page document outlining the evaluation of the facility's need to develop an SDCP. The documentation provided indicates that the following information was reviewed: (1) did the facility have a slug discharge in the past year? (2) does the facility have spill containment? and (3) does the facility post notices providing information to contact the WWTP in the event that a slug discharge occurs? It is recommended that the facility or inspector include information on the "Evaluation of SIU's Need for a Plan to Control Slug Discharge" form that pertains to chemicals, chemical storage, and floor drain locations at the facility. The storage of chemicals in proximity to a floor drain may increase the potential for a slug discharge to occur at a facility and, thus, the facility's need to develop an SDCP.

## 10. Enforcement

The federal pretreatment regulations at 40 CFR 403.8(f)(5) require the District to develop and implement an ERP. This plan must contain detailed procedures indicating how the District will investigate and respond to instances of industrial user noncompliance. During initial conversations with the District, the District representative was unsure if the District had implemented an ERP. During the audit, the EPA audit team had discussions with the District's Contract Engineer who stated that the District's ERP was a component in the District's SUO. A cursory review of the District's draft SUO determined that the ERP was located in section 3.08.010. This section states that the District shall develop and implement an ERP which should include a description of how the District will investigate noncompliance, describe escalating enforcement, identify officials responsible for each response, and adequately reflect the District's primary responsibility to enforce all applicable pretreatment requirements and standards. However, section 3.08.010 of the District's SUO does not specifically identify how the District will investigate and respond to instances of industrial user noncompliance, or who is responsible for implementing the enforcement action. The District is required to develop and implement an ERP as stated at the federal regulations at 40 CFR 403.8(f)(5).

According to the 2010 inspection report, the District had failed to identify all instances of noncompliance and therefore had not taken appropriate enforcement action against SIUs in violation. The District was required to implement the enforcement actions outlined in its ERP for all instances of noncompliance. In response to this requirement, the District stated that it was currently reviewing and identifying all instances of noncompliance. In addition, the District stated that details of its compliance and enforcement activities were documented in the *Annual Pretreatment Report* for 2012, which was submitted to the Central Valley Water Board on February 28, 2013.

During the audit team’s review of the Stratas Foods file, self-monitoring reports indicating violations, as detailed in Table 1 below, were examined. The limit for O&G was stated as 100 mg/L in the standard conditions of the non-residential wastewater discharge permits. A memorandum from the District’s Contract Engineer was included in the facility file which granted an O&G variance for a limit of 200 mg/L for O&G. However, the memorandum granting the variance was issued on February 21, 2013. From the review of the Stratas Foods file, it was determined that the District did not take enforcement action against the facility for the discharge violations for 2012.

**Table 1: 2012 Self-Monitoring O&G violations at Stratas Foods**

<b>Self-Monitoring Report Month</b>	<b>Monthly Average O&amp;G Sample Results (mg/L)</b>
March	124
April	121
May	168
June	106
October	217

Documentation in the file indicated the facility notified the District, via a letter, of a monthly average O&G exceedance on October 17, 2012. According to the September 2012 self-monitoring report, the facility’s monthly average sampling result for O&G was 166 mg/L; the permitted limit for O&G is 100 mg/L. However, the District did not take enforcement action against the facility upon receipt of letter. Additionally, documentation was not provided in the file which showed that the facility notified the District for each of the violations listed above. The District is required to ensure that the facility notifies the District within 24 hours of becoming aware of a violation as stated in the federal regulations at 40 CFR 403.12(g)(2). In addition, the District is required to ensure that it is taking the appropriate actions to enforce the discharge limits stated in the facility permit in order to protect the District’s POTW.

According to the 2010 inspection report, the District failed to recognize that Calpine’s and PPG’s iron violations in 2009 caused the facilities to be in SNC. The District was required to review all SIU files to determine whether other SIUs were in SNC for 2009. In addition, the District was required to publish a list of all SIUs in SNC for 2009 in a newspaper of general circulation. In response to this requirement, the District stated that it was reviewing and identifying all instances of SNC. The District also stated that it would prepare a schedule of intended actions regarding significant noncompliance in December 2013.

As stated at 40 CFR 403.8(f)(2)(viii), the District is required to annually publish all facilities in SNC in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. The District representative stated during the 2014 audit that the District does not publish notices regarding facilities in SNC in a newspaper of general circulation. The District is required to ensure that the names of SIUs in SNC are published in a newspaper of general circulation as stated in the federal regulations at 40 CFR 403.8(f)(2)(viii). As noted in section 2.3.1, the District was unaware if any of the SIUs were in SNC in 2013.

## **11. Data Management**

According to the federal regulations at 40 CFR 403.12(o), any IU and POTW subject to the reporting requirements shall maintain records of all information resulting from any monitoring activities. As a component of the 2014 audit, the District's data management system for implementation of the pretreatment program was reviewed. When the audit team requested to review the District's files, the District representative was able to produce some of the IU permits in hardcopy form but was unable to provide the full IU files to the audit team. The audit team reviewed files that were maintained by the Contract Engineer, but not by the District. These files were not kept for regulatory purposes but for tracking the Contract Engineer's work products. The District's Contract Engineer stated that they were not contracted to maintain the District's official files. The documentation for each SIU was located in individual files. However, some SIU reports were stored in other SIU's files. The files at the District's Contract Engineer's office were unorganized, incomplete, and did not constitute pretreatment files on the District's behalf. The District is required to maintain records of monitoring activities as stated in the federal regulations at 40 CFR 403.12(o). It is strongly recommended that the District develop a system of documenting and filing information for implementation of the pretreatment program and that the District maintain records of the pretreatment program separate from that of its Contract Engineer.

## **12. Pretreatment Program Outreach**

The 2014 audit revealed that the District is not involved in public outreach and education pertaining to the pretreatment program. It is recommended that the District develop education and outreach materials for the public about pollution prevention activities. For instance, the District should implement a dental mercury, pharmaceutical recovery, and FOG management program. The programs should provide educational outreach material for the District's service area. The District could also provide educational material at schools, local fairs, and on the District Web site.

## **13. Pretreatment Program Resources**

As a component of the 2014 audit, the District's pretreatment program budget was requested. During the initial discussion of the budget, the District representative stated that the budget was not specifically broken down by program (i.e., there was not a specific line item identifying resources strictly dedicated to the pretreatment program). The District representative provided the audit team with a list that included the budget for water, sewer, solid waste disposal services, recreational services, and administration and general services. The federal regulations at 40 CFR 403.8(f)(3) require the District to have sufficient resources and qualified personnel to carry out the authorities and procedures of the industrial pretreatment program. The District is required to evaluate its resources, including personnel, to ensure that the industrial pretreatment program is adequately managed. In addition, it is strongly recommended that the District reorganize the budget to break down specific programs in order to determine if the pretreatment program resources are adequate for the operation of a successful program.

In addition, the audit team requested the District to provide a scope of work, or other documentation, outlining the specific responsibilities and contractual expectations of the District's Contract Engineer. The District provided the audit team with a very general contract agreement that did not outline specific contractor responsibilities. It is strongly recommended that the District develop a clear, organized, and specific written agreement with the contractor so that the contractor understands the work requirements, deliverables, and the District's expectations. Clearly stated expectations will minimize confusion about which aspects of the pretreatment program the contractor is responsible for. Maintaining a specific, detailed, written agreement with the contractor should also ensure that all aspects of the pretreatment program are being properly implemented and maintained.

## **14. Summary of Requirements and Recommendations**

Listed below are the primary requirements and recommendations resulting from the audit of the District's pretreatment program. For more specific information pertaining to each comment, please refer to the cited sections of the report.

### **14.1 Requirements**

1. According to the federal regulations at 40 CFR 403.5(c), Each POTW developing a POTW Pretreatment Program shall develop and enforce specific limits to implement the general and specific prohibitions at 40 CFR 403.5(a) and (b). Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce these limits. During discussions with the District representative and the District's engineer, it was determined that technically based local limits had not been developed to protect the POTW from general and specific prohibitions listed in the federal regulations. Furthermore, the District could not provide documentation stating that the District had performed a formal local limits evaluation to determine pollutants of concern. The District is required to perform a local limits evaluation and develop local limits as necessary, in order to protect the POTW as stated in the federal regulations at 40 CFR 403.5(c). (Section 4, Local Limits)
2. As a component of the 2014 audit, the District's draft SUO and associated streamlining provisions were discussed. The District's Contract Engineer stated the draft version of the SUO included the required streamlining provisions. However, it was determined that the draft version of the SUO did not include the full definition of SNC; therefore, it was unclear if the District had adopted the revised SNC definition as a streamlining change. Section 1.03.010 of the draft SUO stated the following for the definition of SNC: "shall have the same meaning as 40 CFR 403.3(f)(2)(viii), or as it may be amended." This is an incorrect citation for SNC in the federal regulations; in addition citing where to find the regulation is not an adequate definition. The federal definition of SNC is stated at 40 CFR 403.8(f)(2)(viii)(A-H). The District shall amend its draft SUO to include the actual definition of SNC so that the District employees and IUs alike understand what would place a facility in significant noncompliance. The District

- is required to modify its draft SUO to include at least the federal definition of SNC as stated at 40 CFR 403.8(f)(2)(viii)(A–H) of the federal regulations. In addition, the District is required to ensure that the draft version of the SUO is modified to include the required streamlining provisions. (Section 5, Legal Authority)
3. During conversations with the District representative and the Contract Engineer, it was stated that the District considers significant dischargers as Class I dischargers, and Class I permits have a one-year duration. Subsequently, the District identified Class II dischargers as all other permit holders, with permits renewed on a 2–3 year cycle. The delineation between Class I and Class II dischargers was not provided in the District’s draft SUO. If the District intends to have two classes of dischargers, then it is required to revise its draft SUO to include a definition and explanation of each class. (Section 5, Legal Authority)
  4. According to section 1.03.010 of the District’s draft SUO, an *industrial user* is described as one that “shall have the same meaning as that term is defined in 40 CFR 403.3(l), or as it may be amended.” However, the definition located at 40 CFR 403.3(l) is the definition of the term *National Pretreatment Standard, Pretreatment Standard, or Standard*, not the definition of *industrial user*. The District is required to amend its draft SUO to at least include the federal definition of *industrial user*, which is provided at 40 CFR 403.3(j) of the federal regulations. Furthermore, the District is required to review its draft SUO to ensure that all of its definitions meet the requirements of the respective federal definitions. (Section 5, Legal Authority)
  5. As a component of the 2014 audit, the draft version of the District’s SUO was reviewed for its consistency with the requirements at 40 CFR 403. According to the federal regulations at 40 CFR 403.5(b)(7), “Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems should not be introduced into a POTW.” According to section 3.05.030(D) of the District’s draft SUO, “noxious or malodorous solids, liquids or bases, which either singly or by interaction with other wastes, are capable of creating a public nuisance or hazard to life, may cause acute worker health and safety problems, or are or may be sufficient to prevent entry into a sewer for its maintenance and repair” shall not be introduced into the POTW. It was determined that the provision in the District’s SUO pertaining to noxious material as a specific prohibition is not consistent with the federal regulations at 40 CFR 403.5(b)(7). The District is required to ensure that the prohibitions on wastewater discharges listed as specific prohibitions in the District’s draft SUO are at least consistent with the specific prohibitions listed at 40 CFR 403.5(b) of the federal regulations. (Section 5, Legal Authority)
  6. According to the federal regulations at 40 CFR 403.8(f)(2)(i), the POTW shall develop and implement procedures to identify and locate all possible IUs which might be subject to the pretreatment program. In addition, 40 CFR 403.8(f)(1)(iii) requires contributions to the POTW by each IU to be controlled through a permit

- or other means. During initial conversations with the District representative, the Fresno Truck Wash facility was discussed. The District representative provided the audit team with a list of facilities that were monitored daily for electrical conductivity (EC), conducted, ultimately, for billing purposes. The District representative stated that the EC monitoring results indicated that the Fresno Truck Wash was discharging wastewater with high EC values to the sanitary sewer. This facility was not covered by a permit. As a component of the 2014 audit, the audit team visited the facility and verified that the facility was discharging wastewaters with significant pollutant loading to the sanitary sewer without a permit. The District is required to develop and implement procedures to identify and locate all possible IUs which might be subject to the pretreatment program as stated in the federal regulations at 40 CFR 403.8(f)(2)(i). The District is also required to control through permit, order, or similar means the contribution to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements as stated in the federal regulations at 40 CFR 403.8(f)(1)(iii). (Section 6, Nondomestic Discharger Characterization)
7. According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the District is to control, through permit, order, or similar means, the contribution to the POTW by each IU to ensure compliance with pretreatment standards and requirements. As a component of the 2014 audit, the IU permits were discussed. The District representative stated that SIU permits are renewed annually and other permits are renewed every two to three years. The District's Contract Engineer stated that the SIU permits were renewed annually so the permits and information stayed current and so the District is actively aware of their expiration date. At the time of the 2014 audit, the District representative stated that the SIU permits were expired. Therefore, the District's significant nondomestic dischargers were discharging to the District's sanitary sewer with expired (invalid) permits. The District representative stated that the recent retirement of the previous general manager had precluded the SIU permits from being renewed. The District representative and the Contract Engineer stated that the Board of Directors were meeting a week after the audit and would review and sign the new permits at that time. The District is required to ensure that IU permits do not expire before issuing updated permits in order to control the contribution to the POTW from each industrial user to ensure compliance with applicable pretreatment standard and requirements as stated at the federal regulations at 40 CFR 403.8(f)(1)(iii). (Section 7.1, Reissuance of SIU Permits)
  8. As required at 40 CFR 403.8(f)(1)(iii)(B)(1), permits must contain a statement of duration, not to exceed five years. During the 2014 audit, it was determined that the permits reviewed had an issuance date and an expiration date but did not have an effective date. Permits should be issued before their effective dates so that permittees are aware of their limitations, obligations, and requirements before they are held responsible for upholding those permit conditions. From the information provided on the permits, the audit team could not determine if permits were issued prior to becoming effective. Therefore, the District is

- required to implement the appropriate changes to ensure and document that the permits are issued before their effective date. (Section 7.2, Permit Effective Date)
9. The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require POTWs to identify the sampling locations in control mechanisms (permits). As a component of the 2014 audit, the sampling locations listed in the permits were reviewed. Each of the permits reviewed stated that the permittee must monitor outfall 001. In addition, part 3.2(a) of the permits lists the measurement location as “001.” However, this measurement location is not defined, described, or depicted in the permits. In order to ensure that samples are collected at the correct locations, the District is required to include an adequate descriptions of the sampling locations in the permits as stated in the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4). The audit team also recommends that the District develop diagrams or include photographs of the sampling locations in the permits to avoid any confusion. (Section 7.3, Sampling Location)
  10. As a component of the 2014 audit, the permits were reviewed to determine if the appropriate modifications had been completed regarding the civil and criminal penalties statement. According to part 1.14 of the permit, “Failure to comply with any provisions of this permit, Ordinance 01-13-2004, or applicable State or Federal laws or regulations may result in ... (c) civil and/or criminal penalties.” However, the draft version of the SUO provided to the audit team by the District was Ordinance No. 2013-1. The District is required to update the SUO reference in the permits to the most recent version of the SUO. (Section 7.4, Statement of Civil and Criminal Penalties)
  11. According to the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3), permits are required to include effluent limits. As a component of the 2014 audit, RockTenn CP, LLC permit was reviewed. It was determined that the effluent limit for iron is not included in the RockTenn permit. However, according to part 3.2 of the facility permit, RockTenn is required to collect a grab sample for iron in June from measurement location 001. The District is required to amend the RockTenn permit to include the effluent limits for parameters with which the facility is expected to comply. The permits must include the effluent limits in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3). (Section 7.5, Effluent Limits)
  12. According to the 2010 inspection report, the permits reviewed did not include the requirement to notify the District of a violation within 24 hours of becoming aware of the violation or the requirement to resample and submit the results of the resampling event within 30 days of becoming aware of a violation. Furthermore, the permits did not include the requirements to report slug loadings, spills, or bypasses. Therefore, the District was required to review all SIU permits to ensure that each permit specifically outlines the notification and resampling requirements upon becoming aware of a violation. In response to this requirement, the District stated that the required slug control and resampling requirements were now part of SIU permits in Part 4–Special Conditions. The 2014 audit team found that part

- 4.2 (1 and 2), of the facility permits included the 24-hour violation reporting requirement and the 30-day resampling requirement. In addition, part 4.3 of the permit state that the permittee must immediately notify the District of spills, accidental discharges, slug loads, and slug discharges. However, the permits did not include statements requiring the permittees to notify the District in the event of a bypass. Therefore, the District is required to modify the permits to include the notification of bypass statement located at 40 CFR 403.17(a-c) of the federal regulations. (Section 7.7, Reporting and Notification Requirements)
13. The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be sampled at least once each year unless the POTW has authorized a CIU to forego sampling of a pollutant regulated by federal pretreatment requirements. As a component of the 2014 audit, the contract engineer's files for the SIUs were reviewed for documentation of annual compliance sampling activities. The files reviewed during the audit showed that compliance sampling events for 2013 were not documented in the Rio Bravo, Stratas Foods, Air Products and Chemicals, or PPG Industries files. Therefore, it was determined that the District failed to conduct annual compliance sampling events at these facilities. The District is required to ensure that compliance sampling activities are conducted at SIUs a minimum of once each year as stated in the federal regulations at 40 CFR 403.8(f)(2)(v). (Section 9.1, Compliance Sampling)
14. The pretreatment system at the Fresno Truck Wash facility was not housed within a secondary containment structure. If any of the pretreatment system assets were to fail or rupture, wastewaters would not be contained. The District has not required the facility to develop a slug discharge control plan to ensure that the occurrence of a slug discharge will be minimized during normal operations or clean-up procedures in the case of a failed pretreatment asset. The District is required to have the facility develop a slug discharge control plan to address a slug discharge that may occur under normal operational conditions or in the event of pretreatment system asset failure. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
15. The Inland Star Distribution Centers facility representatives stated that the facility had a spill response plan. In response to the audit team's request to see the spill response plan, the facility representative stated that he would forward a copy if needed after the inspection. The representative was informed that the inspection report would require the District to formally review the spill response plan. The District is required to formally evaluate the facility for the need of a slug discharge control plan. The evaluation should include a formal review of the facility's operation plans. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
16. The Inland Star Distribution Centers facility representatives stated that they provide a re-packing service. The re-packing service involved transferring bulk liquids or powders into smaller volume containers. The process is performed in an outdoor area, between two buildings, where there are no drains. The actual

- process was reported to be contracted out to subcontractors. The subcontracts are responsible for management of all wastes generated (wastes are not disposed of onsite). The District is required to formally evaluate the re-packing operations to ensure that waste generated from the re-packing process are properly managed and not discharged to the sewer system. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
17. The PPG Industries facility representatives stated that self-monitoring samples were collected at the facility's effluent lift station/discharge location. Samples are collected downstream of where the facility's wastewater comingles with wastewater generated at the onsite Air Products and Chemicals, Inc. plant. In addition, the facility representatives stated that the facility's domestic wastewater is tied into the facility's discharge line upstream of the effluent lift station/sampling point. Therefore, samples collected by the facility and District are not representative solely of the facility's industrial wastewater discharge. Furthermore, the facility representatives stated that the facility was unable to collect a representative sample of the facility's industrial wastewater discharge because the only accessible location to the discharge is considered as a confined space, and the facility does not allow its employees to enter confined spaces. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. The District is required to reevaluate the facility's discharge monitoring location to ensure that self-monitoring samples are representative solely of the facility's industrial wastewater discharge. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
18. After the site inspection at the PPG Industries facility, the EPA audit team along with the District code enforcement inspector visited the District's compliance sample collection location. The District collects compliance samples of the facility's discharge at a manhole located west of the facility at the intersection of South Willow Avenue and a railroad track. The manhole was downstream (and west) of the facility's effluent lift station and discharge location. As noted above in note 5, the facility's domestic wastewater along with industrial wastewater from the Air Products and Chemicals, Inc. plant are tied into the facility's discharge line, upstream of the effluent lift station and the District's sampling manhole. However, 40 CFR 403.12(b)(ii) state that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. It is required that the District reevaluate the District's compliance sampling monitoring location to ensure samples are representative solely of the facility's industrial wastewater discharge. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
19. The District was collecting compliance samples from the Stratas Foods facility's discharge line downstream of where the facility's domestic wastewater was

- introduced. Therefore, the facility's domestic wastewater was diluting the facility's industrial wastewater flow that was being sampled by the District. Self-monitoring samples were being collected from a sample port located after the CAF unit weir, but prior to the effluent discharge pipe. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. The District is required to ensure that compliance samples collected at the facility are representative of the facility's industrial wastewater discharge for daily operations. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
20. According to the federal regulations at 40 CFR 403.8(f)(2)(iv), the POTW is required to receive and analyze self-monitoring reports and other notices submitted by IUs in accordance with the self-monitoring requirements in 40 CFR 403.12. From the files reviewed as a component of the 2014 audit, it was determined that 2013 self-monitoring data for the RockTenn CP, LLC facility was not included in the facility file. The District is required to adequately request, receive, and analyze reports submitted by SIUs as stated in the federal regulations at 40 CFR 403.8(f)(2)(iv). (Section 9.4, Requesting, Receiving, and Analyzing Reports)
21. The federal pretreatment regulations at 40 CFR 403.8(f)(5) require the District to develop and implement an ERP. This plan must contain detailed procedures indicating how the District will investigate and respond to instances of industrial user noncompliance. During initial conversations with the District, the District representative was unsure if the District had implemented an ERP. During the audit, the EPA audit team had discussions with the District's Contract Engineer who stated that the District's ERP was a component in the District's SUO. A cursory review of the District's draft SUO determined that the ERP was located in section 3.08.010. This section states that the District shall develop and implement an ERP which should include a description of how the District will investigate noncompliance, describe escalating enforcement, identify officials responsible for each response, and adequately reflect the District's primary responsibility to enforce all applicable pretreatment requirements and standards. However, section 3.08.010 of the District's SUO does not specifically identify how the District will investigate and respond to instances of industrial user noncompliance, or who is responsible for implementing the enforcement action. The District is required to develop and implement an ERP as stated at the federal regulations at 40 CFR 403.8(f)(5). (Section 10, Enforcement)
22. Documentation in the Stratas Foods file indicated the facility notified the District, via a letter, of a monthly average O&G exceedance on October 17, 2012. According to the September 2012 self-monitoring report, the facility's monthly average sampling result for O&G was 166 mg/L; the permitted limit for O&G is 100 mg/L. However, the District did not take enforcement action against the facility upon receipt of letter. Additionally, documentation was not provided in

- the file which showed that the facility notified the District for each of the violations listed above in Table 1. The District is required to ensure that the facility notifies the District within 24 hours of becoming aware of a violation as stated in the federal regulations at 40 CFR 403.12(g)(2). In addition, the District is required to ensure that it is taking the appropriate actions to enforce the discharge limits stated in the facility permit in order to protect the District's POTW. (Section 10, Enforcement)
23. As stated at 40 CFR 403.8(f)(2)(viii), the District is required to annually publish all facilities in SNC in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. The District representative stated during the 2014 audit that the District does not publish notices regarding facilities in SNC in a newspaper of general circulation. The District is required to ensure that the names of SIUs in SNC are published in a newspaper of general circulation as stated in the federal regulations at 40 CFR 403.8(f)(2)(viii). As noted in section 2.3.1, the District was unaware if any of the SIUs were in SNC in 2013. (Section 10, Enforcement)
24. As a component of the 2014 audit, the District's data management system for implementation of the pretreatment program was reviewed. When the audit team requested to review the District's files, the District representative was able to produce some of the IU permits in hardcopy form but was unable to provide the full IU files to the audit team. The audit team reviewed files that were maintained by the Contract Engineer, but not by the District. These files were not kept for regulatory purposes but for tracking the Contract Engineer's work products. The District's Contract Engineer stated that they were not contracted to maintain the District's official files. The documentation for each SIU was located in individual files. However, some SIU reports were stored in other SIU's files. The files at the District's Contract Engineer's office were unorganized, incomplete, and did not constitute pretreatment files on the District's behalf. The District is required to maintain records of monitoring activities as stated in the federal regulations at 40 CFR 403.12(o). It is strongly recommended that the District develop a system of documenting and filing information for implementation of the pretreatment program and that the District maintain records of the pretreatment program separate from that of its Contract Engineer. (Section 11, Data Management)
25. As a component of the 2014 audit, the District's pretreatment program budget was requested. During the initial discussion of the budget, the District representative stated that the budget was not specifically broken down by program (i.e., there was not a specific line item identifying resources strictly dedicated to the pretreatment program). The District representative provided the audit team with a list that included the budget for water, sewer, solid waste disposal services, recreational services, and administration and general services. The federal regulations at 40 CFR 403.8(f)(3) require the District to have sufficient resources and qualified personnel to carry out the authorities and procedures of the industrial pretreatment program. The District is required to evaluate its resources,

including personnel, to ensure that the industrial pretreatment program is adequately managed. In addition, it is strongly recommended that the District reorganize the budget to break down specific programs in order to determine if the pretreatment program resources are adequate for the operation of a successful program. (Section 13, Pretreatment Program Resources)

## **14.2 Recommendations**

1. It is recommended that the District develop a pharmaceutical take-back program and expand its outreach to senior care centers, hospitals, and pharmacies. Successful take-back programs have been implemented in California's San Francisco Bay Area by the Bay Area Pollution Prevention Group (BAPPG); the U.S. Environmental Protection Agency (EPA) considers the BAPPG programs to be model systems. (Section 2.2.3, Pharmaceutical Recovery)
2. The District did not provide data or information to the audit team regarding the mercury concentrations of the WWTP's influent, effluent, or sludge. It is recommended that the District review data pertaining to mercury concentrations of the WWTP's influent, effluent, and sludge in order to determine if these concentrations are decreasing, increasing, or remaining unchanged. Furthermore, it is recommended that the District develop a dental mercury program. The District should begin by identifying the dental facilities in its service area, followed by investigating dental practices pertaining to their handling of dental mercury and amalgam. The American Dental Association serves as an informational resource and provides best management practices pertaining to the management and disposal of dental mercury and amalgam (Section 2.3.3, Dental Mercury)
3. The District representative stated that the District does not have industrial laundry facilities within its service area. It is recommended that the District discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with any industrial laundries that come into the District's jurisdiction in the future. SDSI is a voluntary program to commit to the use of safer surfactants. Safer surfactants are those which break down quickly to non-polluting compounds, therefore helping to protect aquatic life in both freshwater and salt water. Nonylphenol ethoxylates (NPEs) are an example of a surfactant class that does not meet the definition of a safer surfactant. (Section 2.3.4, Industrial Laundries)
4. In addition, according to the State Water Board Order WQ No. 2006-0003, there is a requirement that POTWs enrolled under the General Order evaluate its service area to determine if a FOG program is needed. Therefore, it is recommended that the District continue to develop and implement its FOG control program and provide public outreach about the proper disposal of FOG waste. A component of the FOG program should also include working with FSEs to ensure that FSEs have adequate grease removal devices that are properly maintained in order to protect the District's POTW. In addition, it is recommended

- that the District develop a schedule for conducting FSE inspections and document these inspections. (Section 2.3.5, Performance Measures)
5. It is recommended that the District conduct Internet searches, utilize the EPA's Envirofacts Web site, and develop a line of communication with the local fire department or CUPA in an effort to identify potential nondomestic dischargers which may be subject to regulation by the District's pretreatment program. (Section 6, Nondomestic Discharger Characterization)
  6. It is strongly recommended that the District include more detail about the facility inspections in the inspection reports. Details should include specific manufacturing processes, condition of the pretreatment system, discussions held, calibration details, and characteristics of facility effluent. The District's inspection reports should capture the uniqueness of what was reviewed and discussed during each facility inspection. (Section 9.2, Compliance Inspections)
  7. During the Air Products and Chemicals inspection, it was noted that cooling tower blowdown had accumulated in the secondary containment structure used for chemical storage. The plant superintendent stated that the majority of water evaporates; however, if too much accumulates in the secondary containment structure, he has the ability to pump the water back to the cooling tower. Due to the amount of cooling tower blowdown accumulated in the chemical storage's secondary containment structure, the containment capacity to contain a leak or spill of chemicals may not be adequate. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is appropriately sized for containing chemical spills or leaks so that it is serving its intended purpose (i.e., not to retain cooling tower blowdown). (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
  8. The concrete secondary containment structure around the Air Products and Chemical facility's wastewater treatment chemicals showed signs of deterioration at the time of the site visit. Specifically, the structure had numerous cracks and the corners of the structure were beginning to crumble. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is adequate for containing chemical spills or leaks. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
  9. The pretreatment system at the Fresno Truck Wash had a lot of unlabeled piping. Some of the piping appeared to be designed for primary treatment processes, while other piping appeared to have been installed for additional flow options. In addition, there was not an operation & maintenance (O&M) manual for the pretreatment system. It is recommended that the District conduct a follow up inspection at the facility to understand how the pretreatment system works and encourage the facility to label the pipes and develop an O&M manual for the pretreatment system. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)

10. The piping and instrumentation diagram/drawing (P&ID) that the Fresno Truck Wash facility provided to the inspection team did not depict the 4,500 gallon batch treatment tank or solids management equipment (pump, piping, or drying beds) that were observed during the site inspection. It is recommended that the District conduct a follow up inspection at the facility to review and accurately depict the pretreatment system and sewer discharge locations in a facility diagram. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
11. The Fresno Truck Wash facility representatives stated that they are working with consultants in order to evaluate what system will work best for the specific wastewater treatment needs at the facility. Various facility representatives participated in the inspection process at different times. The representatives were aware of the concerns associated with treating wastewaters generated at the facility. The facility representatives were calibrating the pH and conductivity meters. The inspection team strongly recommends that the District require the facility to develop and implement a formal written operations manual for the operation of the pretreatment system. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
12. The paper filter unit had piping valves in two locations which would allow this unit to be bypassed at the Greentec facility. The valves were positioned at the time of the inspection to deliver wastewaters to the paper filter. The facility representatives stated that they do not use the bypass valving and would remove the valves if requested. The audit team strongly recommends that the District have the facility remove or lock out the bypass valve. If the bypassing capabilities are required for certain operating and maintenance conditions, then a written standard operating procedure shall be developed so that the pretreatment and quality of wastewater are not compromised. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
13. The EPA audit team observed an oil leak in the compressor room during the site inspection at PPG Industries. The facility representatives stated that the oil leak was identified by the maintenance department earlier that day and was awaiting repair. The oil leak was contained to the compressor room. It is recommended that the District follow up with the facility to ensure that the leaked oil is properly disposed of and that the compressor leak is fixed. (Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Audit)
14. During the 2014 audit, the District's Contract Engineer stated that in 2010 the District sent SDCP surveys to its SIUs. The SIUs were required to complete the surveys in order for the District to determine if any SIU needed to develop and implement an SDCP. The District's Contract Engineer stated that none of the District's SIUs were required to develop SDCPs at the time of the surveys were completed. Solely relying upon the completion of the SDCP survey by the IU is not an adequate method to determine the need for an SDCP. The District should

- take the SDCP survey into account, but it is strongly recommended that the District make its determination based on site inspections and practices observed at the facility. (Section 9.5, Slug Discharge Control Plans)
15. The Stratas Foods file reviewed contained a two-page document outlining the evaluation of the facility's need to develop an SDCP. The documentation provided indicates that the following information was reviewed: (1) did the facility have a slug discharge in the past year? (2) does the facility have spill containment? and (3) does the facility post notices providing information to contact the WWTP in the event that a slug discharge occurs? It is recommended that the facility or inspector include information on the "Evaluation of SIU's Need for a Plan to Control Slug Discharge" form that pertains to chemicals, chemical storage, and floor drain locations at the facility. The storage of chemicals in proximity to a floor drain may increase the potential for a slug discharge to occur at a facility and, thus, the facility's need to develop an SDCP. (Section 9.5, Slug Discharge Control Plans)
  16. It is strongly recommended that the District develop a system of documenting and filing information for implementation of the pretreatment program and that the District maintain records of the pretreatment program separate from that of its Contract Engineer. (Section 11, Data Management)
  17. The 2014 audit revealed that the District is not involved in public outreach and education pertaining to the pretreatment program. It is recommended that the District develop education and outreach materials for the public about pollution prevention activities. For instance, the District should implement dental mercury, pharmaceutical recovery, and FOG management programs. The programs should provide educational outreach material for the District's service area. The District could also provide educational material at schools, local fairs, and on the District Web site. (Section 11, Pretreatment Program Outreach)
  18. The audit team asked the District to provide a scope of work, or other documentation, outlining the specific responsibilities and contractual expectations of the District's Contract Engineer. The District provided the audit team with a very general contract agreement that did not outline specific contractor responsibilities. It is strongly recommended that the District develop a clear, organized, and specific written agreement with the contractor so that the contractor understands the work requirements, deliverables, and the District's expectations. Clearly stated expectations will minimize confusion about which aspects of the pretreatment program the contractor is responsible for. Maintaining a specific, detailed, written agreement with the contractor should also ensure that all aspects of the pretreatment program are being properly implemented and maintained. (Section 13, Pretreatment Program Resources)

<b>ICIS WENDB DATA ENTRY WORKSHEET</b>			
PRETREATMENT COMPLIANCE INSPECTIONS/AUDITS			
▶ TYPE OF COMPLIANCE MONITORING: <b>PCA</b>			
▶ NAME OF PRETREATMENT PROGRAM: <b>Malaga County Water District</b>			
▶ CONTROLLING AUTHORITY NPDES ID: CA0084239			
START DATE OF INSPECTION ..... 1/6/2014		▶ END DATE OF INSPECTION ..... 1/7/2014	
LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]): Kettie Holland; PG Environmental; 303-279-1778			
ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]): Danny O'Connell; PG Environmental; 303-279-1778 Anthony D'Angelo; PG Environmental; 303-279-1778			
SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
▶ SIUs* :	II.B.2.a	I.C.4.a	<b>5</b>
▶ SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	<b>0</b>
▶ SIUs Not Inspected:	II.E.2.c	I.F.2.c	<b>0</b>
▶ SIUs Not Sampled:	II.E.2.b	I.F.2.b	<b>4</b>
▶ SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	<b>0</b>
▶ SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	<b>0</b>
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	<b>0</b>
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	<b>0</b>
Criminal Suits Filed Against SIUs:	II.F.1		<b>0</b>
CATEGORICAL INDUSTRIAL USERS (CIUs)			
▶ CIUs:		I.C.4.a	<b>0</b>
OTHER INFORMATION			
Pass-Through/Interference Indicator	<i>(none, Yes, or No)</i>	I.G.6	<b>No</b>
DEFICIENCIES			
Control Mechanism Deficiencies	<i>(No or Yes)</i>	I.D.1;II.A.4	<b>Yes</b>
Inadequacy of Sampling and Inspections	<i>(No or Yes)</i>	II.C and Site Visit Sheets	<b>Yes</b>
Adequacy of Pretreatment Resources	<i>(Yes or No)</i>	I.I	<b>No</b>
<b>FOOTNOTES:</b> ▶ denotes required information * The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User." ** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.			
DATA ENTRY WORKSHEET COMPLETED BY: <b>Kettie Holland</b>		DATE: <b>2/06/2014</b>	
TITLE: <b>Environmental Scientist</b>		TELEPHONE NO.: <b>303-279-1778</b>	

## RNC DATA ENTRY WORKSHEET

<b>RNC DATA ENTRY WORKSHEET</b>			
<i>INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.</i>			
CA name Malaga County Water District			
NPDES number CA0084239			
Date of inspection 1/6-1/7/2014		Date entered into PCS	
		Level	Checklist Reference
NA	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
NA	Failure to submit required reports within 30 days	I	Att. A.A.3
NA	Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
Y	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
Y	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
NA	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
NA	Other (specify)	II	
<b>SNC</b>			
NA	CA in SNC for violation of any Level I criterion		
Y	CA in SNC for violation of two or more Level II criterion		
<p>For more information on RNC, please refer to EPA's 1990 <a href="#">Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</a></p>			
RNC WORKSHEET COMPLETED BY: <b>Kettie Holland</b>		DATE: <b>2/06/2014</b>	
TITLE: <b>Environmental Scientist</b>		TELEPHONE: <b>303-279-1778</b>	

**Air Products and Chemicals, Inc.**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Air Products and Chemicals, Inc.						
Address of Industry: 3333 S. Peach Avenue; Fresno, CA 93725						
Date of visit: 01/07/2014			Time of visit: 10:15 a.m.			
Name of inspector(s): Chris Lopes, Code Enforcement Inspector, Malaga County Water District (District) Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Jim Polek, EPA Region 9 Aide Ortiz, Central Valley Water Board						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Oscar Abundes		Plant Superintendent		559-289-8164		
IU Permit Number: 1140		Exp Date: 12/31/2014; See note 5 in the Notes section for additional details.		IU Classification: Non-Residential Wastewater Discharger, Class I.		
Inspection Type/Purpose	X	Scheduled		Unscheduled	X	PCA
		PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility produces pure oxygen and pure nitrogen through cryogenic air separation. The facility is located on the property of the adjacent PPG Industries facility and is contracted by PPG Industries to produce and provide oxygen and nitrogen for PPG Industries manufacturing processes. The facility is permitted as a Class I user due to the volume of wastewater generated and discharged from the facility. See note 1 of the Notes section of this report for additional details.						
2. Number of employees	1	Number of shifts:	Not applicable (N/A).	Hours of operation:	Approximately 20 hours per week.	
3. Water source: Malaga County Water District. See note 2 of the Notes section of this report for additional details.						
4. Wastestream flow(s) discharged to the POTW: The facility discharges treated condensate from air compressing activities and cooling tower blowdown to the sanitary sewer.						
Sanitary:	N/A.	Process:	30,000-60,000 gallons per day (gpd).	Combined:	N/A.	
5. Describe any significant changes in process or flow: There were no significant changes in the process or flow noted during the time of the inspection.						
6. Type of pretreatment system (Describe): The facility conducts pH adjustment of cooling tower blowdown water utilizing sodium hypochlorite and sulfuric acid and has a target pH range of 8.0–8.3 standard units. The facility representative stated the pH adjustment occurs within the cooling tower; therefore, the chemical dosing area could not be viewed during the site visit. A wastewater monitoring shed, located on the north side of the cooling tower, was visited as a component of the site visit. The monitoring shed was						

equipped with a control board for monitoring the data from the flow, pH, and electrical conductivity (EC) meters at the sample location.			
X	Continuous flow	Batch	Combined
7.	Condition/operation of pretreatment system (Describe): The pretreatment system appeared to be operating properly at the time of the inspection.		
Any unusual conditions or problems with the pretreatment system: There were no unusual conditions or problems observed with the pretreatment system during the time of the inspection.			
8.	Process area description (identify raw materials and processes used): Due to the complexity of the air separation processes, a brief inspection of the process area and wastewater generating practices was conducted. The production processes at the facility consisted of filtering and compressing ambient air; separating oxygen, nitrogen, and particulates; and re-vaporizing the oxygen and nitrogen for delivery to the adjacent PPG Industries facility.		
9.	Condition/operation of process area (Describe): The process area observed during the site visit was very clean and somewhat crowded due to the large equipment used in the cryogenic air separation process.		
Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the time of the site visit.			
10.	General housekeeping in process area (Describe): The plant superintendent explained that dust from an adjacent biomass cogeneration plant was constantly blowing onto the facility. See note 3 of the Notes section of this report for additional details.		
Any unusual conditions or problems with general housekeeping in process area: The process area was coated in a biomass dust from an adjacent biomass cogeneration plant. See note 3 of the Notes section of this report for additional details.			
11.	Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): A 1,000-gallon tank of sulfuric acid, a 1,000-gallon tank of inhibitor chemical, and a 500-gallon tank of sodium hypochlorite were observed stored in a concrete secondary containment structure on the east side of the facility, adjacent to the facility's sample point. See note 4 of the Notes section of this report for additional details regarding the chemical storage area.		
	Any floor drains?	No.	Any spill control measures? Concrete secondary containment structure. See note 4 of the Notes section.
General housekeeping of chemical storage area (Describe): An accumulation of blowdown water from the onsite cooling tower was observed in the chemical storage secondary containment structure. In addition, the concrete secondary containment structure showed signs of deterioration at the time of the site visit. See note 4 of the Notes section of this report for additional details.			
12.	Are hazardous wastes drummed and labeled? Not reviewed (N/R).		
13.	Does the IU have hazardous waste manifests? N/R.		
Any problems associated with hazardous waste: N/R.			
14.	Solid waste production: N/R.		
Solid waste disposal method(s): N/R.			
15.	Description of sample location: A metering flume/utility hole is located on the east side of the facility, adjacent to the facility's chemical storage area and the facility entrance gate. The plant superintendent stated that BC Laboratories, Inc. sets up a composite sampler in the metering flume/utility hole quarterly. The facility discharges into the existing PPG Industries industrial wastewater discharge line. Domestic waste is not generated at the facility.		
Sampling method/technique: The facility's permit requires both grab and composite samples to be collected.			

16. Evaluation of self-monitoring data?	Yes	X	No	N/A
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If yes, was self-monitoring adequate: N/R.

17. Who performs the self-monitoring analysis? BC Laboratories, Inc. collects and analyzes the facility's wastewater.
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Notes:

1. The plant superintendent stated that he visits the plant daily and spends approximately 20 hours per week conducting maintenance and monitoring. A distributed control system (DCS) is located onsite to control plant and wastewater operations; however, the majority of plant operations is controlled and operated 24 hours per day, 7 days per week from a central Air Products and Chemicals, Inc. location in Pasadena, Texas.
2. The facility receives its potable water and electricity supply from the adjacent PPG Industries plant; however, the facility maintains its own non-residential wastewater discharge permit.
3. The plant superintendent explained that dust from an adjacent biomass cogeneration plant was constantly blowing onto the facility. Air compressor inlet filters were installed to prevent dust from entering the compressor and are replaced annually. Although the process area was coated in this biomass dust, the plant superintendent stated that the air compressor inlet filters prevent the dust from influencing the facility's processes.
4. During the inspection, it was noted that cooling tower blowdown had accumulated in the secondary containment structure used for chemical storage. The plant superintendent stated that the majority of water evaporates; however, if too much accumulates in the secondary containment structure, he has the ability to pump the water back to the cooling tower. Due to the amount of cooling tower blowdown accumulated in the chemical storage's secondary containment structure, the containment capacity to contain a leak or spill of chemicals may not be adequate. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is appropriately sized for containing chemical spills or leaks so that it is serving its intended purpose (i.e., not to retain cooling tower blowdown).

In addition, the concrete secondary containment structure around the facility's wastewater treatment chemicals showed signs of deterioration at the time of the site visit. Specifically, the structure had numerous cracks and the corners of the structure were beginning to crumble. It is recommended that the District conduct a follow-up inspection at the facility to ensure that the secondary containment structure is adequate for containing chemical spills or leaks.

5. At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team for each of the facilities visited during the audit. The new, unissued permit for the facility had an expiration date of 12/31/2014.

**American Warehouse Co., Inc.**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: American Warehouse Co., Inc.						
Address of Industry: 3150 South Willow Avenue; Fresno, CA 93725						
Date of visit: 1/07/2014			Time of visit: 1:30 p.m.			
Name of inspector(s): Jill Walsh, Central Valley Water Board Danny O'Connell, EPA Contractor, PG Environmental LLC						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Mike Goosev		President		559-265-4212		
IU Permit Number: Not reviewed (N/R).			Exp Date: N/R.		IU Classification: Non-Residential Wastewater Discharger, Class II.	
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
	<input type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint
Please provide the following documentation:						
1. Nature of operation: The facility provides warehousing and transportation services for a variety of products from the agriculture and water treatment industries. The facility had multiple buildings with multiple rooms. None of these areas had 'wet' operations.						
2. Number of employees	28		Number of shifts:	1	Hours of operation:	Monday through Friday, 8:00 a.m. to 5:00 p.m.
3. Water source: Malaga County Water District (District).						
4. Wastestream flow(s) discharged to the POTW: The facility only discharges domestic wastewaters to the sanitary sewer.						
Sanitary:	N/R.		Process:	N/R.		Combined: N/R.
5. Describe any significant changes in process or flow: No significant changes were reported during the inspection.						
6. Type of pretreatment system (Describe): The facility does not have a pretreatment system. However, the facility does have 3.5 million gallons of containment capacity to store liquids from a major spill or waters contaminated with fire suppression chemicals in the event of a fire.						
<input type="checkbox"/>		Continuous flow		<input type="checkbox"/>	Batch	
<input type="checkbox"/>				<input type="checkbox"/>	Combined	
7. Condition/operation of pretreatment system (Describe): Not applicable (N/A). Any unusual conditions or problems with the pretreatment system: N/A.						
8. Process area description (identify raw materials and processes used): The facility offered warehouse and transportation services for a large variety of solid and liquid products (including crop protection products). The facility's employees were Haz Mat trained. The facility had 412,000 square feet (sq. ft.) of storage area. The facility had seven 50,000 sq. ft. rooms that had the capacity to contain 106,000 gallons of spilled liquid or water used in extinguishing a fire. The facility also had a 37,000 sq. ft. flammable room (designed for the storage of flammable materials) contained in a separate building that had its own 70,000 gallons of liquid storage in case of an emergency. If the interior containment areas exceeded their holding capacity, they were designed to overflow into truck wells. The truck wells provided an additional 1.75 million gallons of storage. The facility had approximately 2.5 million gallons of storage capacity between the						

interior and exterior storage. The facility had an additional holding pond (lined with bentonite clay) for emergency conditions which could store one million gallons of liquids.			
9. Condition/operation of process area (Describe): The interior of the warehouses were dry, clean of debris, and organized. Spill kits were available at multiple locations within the warehouse rooms.			
Any unusual conditions or problems with the process area: There were no unusual conditions or problems observed with the storage areas at the time of the inspection.			
10. General housekeeping in process area (Describe): The warehouses were neat, clean, organized, and dry. No debris or leaking chemicals were observed at the areas that were inspected.			
Any unusual conditions or problems with general housekeeping in process area: N/A.			
11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility did not have one central location for chemical storage. Some of the materials located in the warehouses were stored in bulk and some were packaged liquids. The materials stored in the warehouses were protected by the containment system described in previous sections of this report.			
Any floor drains?	No.	Any spill control measures?	Yes.
General housekeeping of chemical storage area (Describe): N/A.			
12. Are hazardous wastes drummed and labeled? This component was not reviewed as part of the inspection.			
13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection.			
Any problems associated with hazardous waste: N/R.			
14. Solid waste production: This component was not reviewed as part of the inspection.			
Solid waste disposal method(s): N/R.			
15. Description of sample location: The facility only discharged domestic wastewater to the sanitary sewer.			
Sampling method/technique: N/A.			
16. Evaluation of self-monitoring data?	Yes	<input checked="" type="checkbox"/> No	N/A
If yes, was self-monitoring adequate: N/A.			
17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection.			
<b>Notes:</b>			
<ol style="list-style-type: none"> <li>The facility representative provided a copy of the facility's written "Spill, Cleanup, and Decontamination" document (see Attachment 1).</li> <li>The facility's employees were Haz Mat trained and understood that spilled materials and associated cleanup wastes were not to be discharged to the sewer system.</li> <li>No liquid wastes or industrial wastewaters were observed at the facility during the inspection. In addition, the holding pond was dry.</li> <li>The facility had five bathrooms.</li> <li>The facility contact stated that the facility has contracted Clean Globe to conduct activities associated with spill or cleanup wastes such as cleaning up spills and disposing of said wastes.</li> <li>At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team for each of the facilities visited during the audit. The new, unissued permit for the facility had an expiration date of 12/31/2016.</li> </ol>			

No deficiencies were noted during the site inspection.

**Attachment 1**  
**American Warehouse Co., Inc.**  
**Spill, Cleanup and Decontamination Procedures**

*American**1/7/14*

## SPILL, CLEANUP AND DECONTAMINATION

This section is concerned with the procedures to be followed for cleanup and decontamination of spills. Prior planning is essential for spill management.

### Awareness

1. Survey products handled.
2. Review labels for special handling instructions or classifications of each chemical such as flammable, poisonous, corrosive, etc.
3. Review product safety data sheets.
4. Be familiar with the list of emergency phone numbers such as local poison control center, local fire department, local hospitals, etc. Tee numbers are posted in the main office and by the telephones in the warehouse. Always dial 911 first.
5. No matter how small, employees should always report all product spills immediately to the warehouse foreman.
6. Information on products are available from both package labels and material safety data sheets. These sources provide such information as:
  - A. Chemical name of the active ingredient.
  - B. Physical and chemical characteristics.
  - C. Safety and environmental hazards including the potential for fire, explosion, and symptoms.
  - D. Medical conditions which may be aggravated by exposure.  
Degree of toxicity as indicated by signal words - DANGER WARNING and CAUTION.
  - E. Precautions for safe handling and use, including appropriate hygienic practices
  - F. Procedures for cleanup of spills or leaks, decontamination of equipment, emergency and first aid procedures.

**Preparedness**

Spill cleanup and decontamination materials should be assembled in advance and be readily available for use. These kits are specially marked and stored in readily accessible locations throughout the warehouse. Spill cleanup materials include:

1. A 55 gallon steel open head over pack drum (this is used to store cleanup supplies as well as a container for spilled materials).
2. Two pairs of impervious gloves, boots and aprons, and non woven disposable coveralls.
3. Two pairs of splash proof goggles.
4. Dust masks or filters.
5. One square end shovel.
6. Two Brooms.
7. Two fifty pound bags absorbent clay (oil dry) or vermiculite.
8. One large box of household detergent.
9. One floor mop (not sponge type).
10. One open head pail (2 to 5 gallons).
11. One dust pan.
12. One tarp.
13. Three large clear polyethylene bags (industrial garbage bags).

Spill cleanup kits are inspected periodically to insure everything is in good condition and still in its proper place.

**Containment & Control**

Once a spill or leak is discovered, unnecessary personnel should be removed from the area. Contact foreman right away. Then, two employees with the proper safety gear should then proceed to contain the spill and isolate the leak. Never allow an employee to work alone around a chemical spill.

Every effort should be made to contain spilled chemicals on the spill site and keep them from entering storm drains, wells, water systems and waterways.

Liquid spills should be contained by diking the spill area with an inert absorbent material like absorbent clay or vermiculite. Use of sawdust or sweeping compound should be avoided because of possible fire hazards if the spilled material should be an oxidizer.

Granular or powder material should be contained by spraying with a fine mist of water or covering with a tarp.

The leaking container should be repositioned to prevent further loss of product; i.e., if a drum is leaking from the bottom it should be turned upside down so that the hole is above the liquid line of the drum.

Segregate and preferably from the spill area those containers which are clean and undamaged, to prevent further contamination of the products.

The leaking package should be placed in a recovery drum. Leaking packages of dry material could be placed either in a recovery drum or in a heavy duty clear plastic bag.

Patching should be considered to reduce spilling or leaking, but only if it can be done safely and without further personnel exposure. However, even patched containers should be placed in a recovery drum. Never tender a patched container to a carrier for transport unless it is in a recovery drum.

A recovery drum must be labeled and marked just as the package inside.

**The following procedures should be used to clean up spills:**

#### **Liquid Material**

Wearing proper protective gear; spread an absorbent around the edge of the spill and then sweep toward the center. Shovel up the absorbent material and place in a recovery drum. Once again spread absorbent around the spill area, then scrub area with a solution of 1 cup strong household detergent per one gallon of water. The absorbent around the edge will contain the scrubbing solution and prevent further spreading of the spilled material that is picked up by the solution. Sweep the absorbent towards the center again to pick up the scrubbing solution. Shovel this up as well and place in the recovery drum. Repeat this process as necessary.

The outsides of contaminated containers would be cleaned with the same solution. Collect the solution drippings and rinse water in drop pans and put it into the recovery drum with the absorbent. Contaminated outer cartons should be discarded into the recovery drum. Undamaged inner packages that have been decontaminated may be replaced in new cartons.

If the spill occurred on the ground, dig up enough of the surface soil (at least 2 inches below the moist soil) to eliminate the contamination and place it in a recovery drum.

**Dry Materials**

Wearing proper protective gear place any damaged containers of dry material in clear, heavy duty plastic bags, or a recovery drum. If there is a danger of a breeze spreading the material, it may be contained by spraying a fine mist of water on or placing a tarp over it. While sweeping, avoid brisk movements to keep the material from becoming airborne. If using a tarp, roll it back, little by little, as you sweep up the spilled material. All of the sweepings should be placed in a recovery drum. The spill area should then be scrubbed with a detergent solution as described in the liquid spill section.

It is essential that all equipment used in the clean up also be decontaminated before returning to the storage area. Equipment should be scrubbed with the detergent solution in the same manner as contaminated containers. Porous materials such as brooms, mops, coveralls and leather shoes should be discarded in the same recovery drum as the contaminated absorbent.

All recovery drums must be tightly sealed and properly marked. They should then be returned to the plant from which they were shipped. They will then recover what product it can and properly dispose of the rest.

Never guess as to the proper method of cleaning up spills, decontamination, or marking of spilled material. Our customers have provided emergency numbers from you to call to receive advice and assistance. (These numbers are in the main office where the M.S.D.S. are kept.)

**Fresno Truck Wash**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Fresno Truck Wash						
Address of Industry: 4170 S. Bagley Avenue; Fresno, CA 93725-9387						
Date of visit: 1/07/2014			Time of visit: 3:00 p.m.			
Name of inspector(s): Jill Walsh, Central Valley Water Board Danny O'Connell, EPA Contractor, PG Environmental LLC						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Sammy Bulgara		General Manager		559-233-4849		
IU Permit Number: The facility was not permitted.		Exp Date: Not applicable (N/A).		IU Classification: Not Permitted. Refer to note 10 of the Notes section.		
Inspection Type/Purpose		Scheduled	<input checked="" type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
		PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility washes trucks, tankers, and trailers for a variety of different clients. An internet search provide a detailed list of services offered by the facility (Attachment 1). The facility washed both the inside and outside of trucks, tankers, and trailers. The facility representative stated that petroleum product tankers were not being serviced. Refer notes 1-4 of the Notes section for additional information concerning the nature of the operation.						
2. Number of employees	6	Number of shifts:	1	Hours of operation:	See note 1 in the Notes section.	
3. Water source: Malaga County Water District (District).						
4. Wastestream flow(s) discharged to the POTW: The facility discharged pretreated wash waters from the truck washing operations to the sanitary sewer.						
Sanitary:	Not reviewed (N/R).	Process:	N/R.	Combined:	3,500 gallons per day (gpd).	
5. Describe any significant changes in process or flow: No significant changes were observed during the inspection. The District did not have a file for this facility. Therefore, prior inspection reports were not available for review by the inspection team in an effort to provide a bench mark for the facility's typical operations. Refer to note 2 in the Notes section for addition information.						
6. Type of pretreatment system (Describe): The facility has been in the process of upgrading and redesigning its pretreatment system. The facility provided a piping and instrumentation diagram/drawing (P&ID) to the inspection team (Attachment 2), however the batch treatment tank was not included in this P&ID, refer to note 3 of the Notes section.						
<p>The pretreatment system receives flows via a floor trench system. The pretreatment system has the following assets operating in series: a batch treatment tank (4,500 gallons), an "EQ tank" (approximately 4,000 gallons), an aerated pH adjustment tank which the facility representative referred to as "AIR-1" (approximately 4,000 gallons), a pH adjustment system supporting the AIR-1 tank's operations, another aerated tank which the facility representative referred to as "AIR-2" (approximately 4,000 gallons), a third aerated tank which the facility representative referred to as "AIR-3" (approximately 1,200 gallons), a reaction tank with decant valving which was referred to as "RXN" (approximately 2,000 gallons), a</p>						

<p>polymer feed system supporting the RXN tank, two 50 micron bag filters (run in parallel), and a final discharge sump to the sanitary sewer. Solids that were removed from the pretreatment system's three hopper bottomed tanks (batch treatment, EQ, and RXN) are discharged to a solids sump and pumped to the facility's dry beds. The attached photograph log contains photographs of the pretreatment equipment that were in use at the time of the inspection.</p>					
	Continuous flow		Batch	X	Combined
7.	<p>Condition/operation of pretreatment system (Describe): The pretreatment system was located outside and was uncovered. There were areas with multiple pipes having similar paths and some pipes and hoses appeared to provide bypassing abilities of the pretreatment system (refer to photographs 4, 5, and 6 of the attached photograph log). The pipes at the facility were not labeled. The facility did not have formal, written procedures for operating the pretreatment system during the inspection, however the facility representatives appeared to be very knowledgeable about the operation of the pretreatment system based on responses to specific questions during the inspection process. Refer to note 2 in the Notes section for further detail. In addition, some of the tanks had been cut open and used as observation ports. The modifications to some of the tanks may be impacting the structural integrity of the tank (refer to photo 5 in the attached photograph log).</p>				
<p>Any unusual conditions or problems with the pretreatment system: There were no unusual conditions observed with the pretreatment system during the time of the inspection. However, as previously noted, the facility did not have a file with information about the facility and the operation of the facility's typical pretreatment system. Additionally, the facility had been making modifications to the pretreatment system. Refer to note 2 and 7 in the Notes section for further detail.</p>					
8.	<p>Process area description (identify raw materials and processes used): The facility had two interior truck bays for conducting washing operations in addition to an office. The facility also had areas outside the washing bays that appeared to be used for other operations. One area in front of the facility had a vehicle lift system. The site inspection mainly focused on observing the process operations area from afar and understanding the operation of the pretreatment system.</p>				
9.	<p>Condition/operation of process area (Describe): The truck washing bays were in use at the time of the inspection and were observed from afar.</p>				
<p>Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the inspection. However, if the facility were to wash vehicles outside the front of the building, wash waters may not be collected by the facility's wastewater trench system. See note 8 in the Notes section for further detail.</p>					
10.	<p>General housekeeping in process area (Describe): The process areas were wet from the washing operations taking place at the time of the inspection.</p>				
<p>Any unusual conditions or problems with general housekeeping in process area: N/R.</p>					
11.	<p>Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility had soaps, solvents, and a cleanser for the washing operations. The facility also had caustic and polymers for pretreatment system operations. This chemical storage area of the facility was not reviewed in any detail due to time.</p>				
	Any floor drains?	Floor trench to the treatment system.		Any spill control measures?	No.
<p>General housekeeping of chemical storage area (Describe): N/R.</p>					
12.	<p>Are hazardous wastes drummed and labeled? This component was not reviewed as part of the inspection.</p>				
13.	<p>Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection.</p>				
<p>Any problems associated with hazardous waste: N/A.</p>					

14. Solid waste production: The facility generates a large volume of solids through its wastewater pretreatment processes. The solids/sludges were pumped from individual process tanks to a solids collection sump. The solids collected in the sump were pumped to the facility's drying beds. The drying beds appeared to be modified construction waste bins. Refer to photographs 7, 8 and 11 of the attached photograph log.					
Solid waste disposal method(s): Dried solids are hauled offsite for disposal.					
15. Description of sample location: The sampling point was located at the final sump that drained to the sanitary sewer via gravity. Refer to photograph 8 of the attached photograph log for an image of the location.					
Sampling method/technique: The sample collected during the inspection was collected as a grab. Refer to photographs 9 and 10 of the attached photograph log.					
16. Evaluation of self-monitoring data?		Yes	X	No	N/A
If yes, was self-monitoring adequate: N/A.					
17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection.					
Notes:					
<ol style="list-style-type: none"> <li>1. The facility's hours of operation vary: Monday – Friday 6:00 a.m. to 10:00 p.m., Saturday 8:00 a.m. to 8:00 p.m., and Sunday by appointment only.</li> <li>2. It was unclear what the status of the facility's process operations and pretreatment system were prior to the site inspection. An e-mail was found on the recently retired District Manager's computer dated November 22, 2013 that summarized two meetings between the District's Contract Engineer, District Code Enforcement Inspector and representatives of the facility. The pretreatment system had a lot of unlabeled piping. Some of the piping appeared to be designed for primary treatment processes, while other piping appeared to have been installed for additional flow options. In addition, there was not an operation &amp; maintenance (O&amp;M) manual for the pretreatment system. It is recommended that the District conduct a follow up inspection at the facility to understand how the pretreatment system works and encourage the facility to label the pipes and develop an O&amp;M manual for the pretreatment system.</li> <li>3. The piping and instrumentation diagram/drawing (P&amp;ID) that the facility provided to the inspection team did not depict the 4,500 gallon batch treatment tank or solids management equipment (pump, piping, or drying beds) that were observed during the site inspection. It is recommended that the District conduct a follow up inspection at the facility to review and accurately depict the pretreatment system and sewer discharge locations in a facility diagram.</li> <li>4. The facility had additional wastewater treatment equipment on site, including two filter presses. The smaller of the two units (refer to photograph 12 of the attached photograph log) appeared to be in a started up evaluation mode. The larger unit (refer to photograph 13 of the attached photograph log) appeared to be in the process of being installed, but the unit was not yet operational. The facility also had two granular activated carbon filters onsite to be installed and used as polishing units for treated wastewaters.</li> <li>5. As previously stated, the treatment system did not have an O&amp;M manual. Based on conversations with the facility representatives and observations associated with the assembly of the treatment process train, it appeared that multiple approaches had been used in the assembly of the pretreatment system. Most of the tanks appeared to have been assembled at various times, in an incremental process, in an effort to improve effluent wastewater quality.</li> </ol>					

6. During general discussions with facility representatives, it was determined that their knowledge of the operation and design function of the individual treatment units was extensive.
7. The facility representatives stated that they are working with consultants in order to evaluate what system will work best for the specific wastewater treatment needs at the facility. Various facility representatives participated in the inspection process at different times. The representatives were aware of the concerns associated with treating wastewaters generated at the facility. The facility representatives were calibrating the pH and conductivity meters. The inspection team strongly recommends that the District require the facility to develop and implement a formal written operations manual for the operation of the pretreatment system.
8. The facility had a lift rack in front of the office area. This lift rack was not in use at the time of the inspection. If this lift rack were to be used for vehicle washing, all of the wash waters may not be collected by the facility's wastewater trench system. This issue and subject matter were not discussed as a component of the inspection.
9. The pretreatment system was not housed within a secondary containment structure. If any of the pretreatment system assets were to fail or rupture, wastewaters would not be contained. The District has not required the facility to develop a slug discharge control plan to ensure that the occurrence of a slug discharge will be minimized during normal operations or clean-up procedures in the case of a failed pretreatment asset. The District is required to have the facility develop a slug discharge control plan to address a slug discharge that may occur under normal operational conditions or in the event of pretreatment system asset failure.
10. The District had not issued a permit to this facility at the time of the inspection. From the facility inspection, it was confirmed that wastewater with a significant pollutant loading was being generated and discharged from this facility to the sanitary sewer. According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the District is required to control through permit, order, or similar means the contribution to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements. Therefore, the District is required to permit this facility as part of the pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii).

**Attachment 1  
Fresno Truck Wash  
Price List for Services**

PRICELIST

Page 1 of 2



FRESNO

**TRUCK**

**WASH**

**PRICE LIST**

TRACTOR ONLY	W/SLEEPER	WO/SLEEPER
TRACTOR.....	\$35.00+	\$30.00+

TRACTOR \$ TRAILER	SINGLE	DOUBLE
CAR CARRIER	\$65.00+ \$15.00 INSIDE ACID	
CEMENT TRUCK	\$65.00+	
VAN.....	\$55.00+	\$70.00+
VAN (FURNITURE).....	\$65.00+	\$75.00+
TANKER.....	\$65.00+	\$70.00+
DUMP.....	\$55.00+	\$65.00+
COMMODITY.....	\$75.00+	\$90.00+
FLATBED.....	\$50.00+	\$55.00+
LIVESTOCK.....	\$75.00+	\$90.00+

TRAILER ONLY	SINGLE	DOUBLE
VAN.....	\$35.00+	\$55.00+
TANKER.....	\$45.00+	\$55.00+
DUMP.....	\$40.00+	\$55.00+
COMMODITY.....	\$45.00+	\$55.00+
FLATBED.....	\$22.00+	\$32.00+
LIVESTOCK.....	\$50.00+	\$60.00+

TRUCK	CARGO BOX	FLATBED
UP TO 20FT.....	\$25.00+	\$25.00+
21 TO 30 FT.....	\$30.00+	\$30.00+
31 TO 40 FT.....	\$35.00+	\$35.00+
41 FT+.....	\$40.00+	\$40.00+

DETAIL STEAM CLEANING (TRUCK UNDERCARRIAGE)	
FULL DETAIL UNDER-CARRIAGE STEAM ON LIFTS.....	\$175.00+

BUS/COACH.....	R/V.....	TRAVEL TRAILERS
\$1.00.....	PER FOOT	
\$10.00.....	HAND SCRUB TOP OF BUS / RV / TRAVEL TRAILER	

<http://www.fresnotruckwash.com/PRICELIST.html>

1/29/2014

PRICELIST

\$55.00 .....BUS HAND SCRUB

MISCELLANEOUS

VAN..... \$15.00  
 PICKUP.....\$12.00-15.00+  
 CARS .....\$7.00+  
 HORSE TRAILER.....\$1.50 PER FOOT (WITH ACID WASH)

EXTRA CHARGE

SHEEP SKINS ONLY.....\$10.00 TR ONLY  
 WHEELS ONLY.....\$2.00 EA  
 ARMORAL TIRES.....\$0.75 EA  
 TOWEL DRY.....\$7.00 TR ONLY

ACID	SINGLE	DOUBLE
TANKER.....	\$30.00+	\$45.00+
DUMP.....	\$30.00+	\$45.00+
COMMODITY.....	\$45.00+	\$55.00+
LIVESTOCK.....	\$40.00+	\$50.00+
FLATBED.....	\$30.00+	\$35.00+



**CHEMICAL TANKER  
 WASHOUT PRICE  
 LIST**

**PRODUCT  
 PRICES**

ACID/ACID BASE.....	\$175.00+
CAUSTIC/CAUSTIC BASE.....	\$175.00+
CLEANING COMPOUNDS.....	\$175.00+
IODINE.....	\$175.00+
KARLINA (PAPER ADDATIVE).....	\$295.00+
LATEX / LATEX BASE.....	\$225.00+
CAN LINER COATING.....	\$395.00+
PALM OIL.....	\$295.00+
OILS ( NON PETROLEUM ) .....	\$295.00+
POLYMER EMULSION ( ELEPHANT SNOT ) .....	\$395.00+
WAXES / WAX LIKE.....	\$295.00+

PLEASE CALL FOR MORE INFORMATION, PRODUCT  
 LIMITATIONS,CHARGES ON EXCESS HEEL, ECT. CONTACT SAMMY  
 BULGARA @ 559-217-5791 24 HRS. A DAY

GPICELICT

Page 1 of 1



**FOOD GRADE TANKER WASHOUTS PRICE LIST**

<b>PRODUCT</b>	<b>PRICE</b>
MILK & CREAM.....	\$100.00+
MILK CHOCOLATE.....	\$175.00+
SUGAR.....	\$100.00+
ALCOHOL.....	\$100.00+
JUICE.....	\$100.00+
JUICE CONCENTRATE.....	\$150.00+
FOOD GRADE W/O (KOSHER & REGULAR).....	\$150.00+
KOSHER CONVERSION.....	\$200.00+
TYPE - 2 WASH-OUT.....	\$125.00+
TYPE - 3 WASH-OUT.....	\$150.00+
TYPE - 4 WASH-OUT.....	\$175.00+
POKER/CORROSIVE SODA.....	\$175.00+
FAN DRY.....	\$25.00+

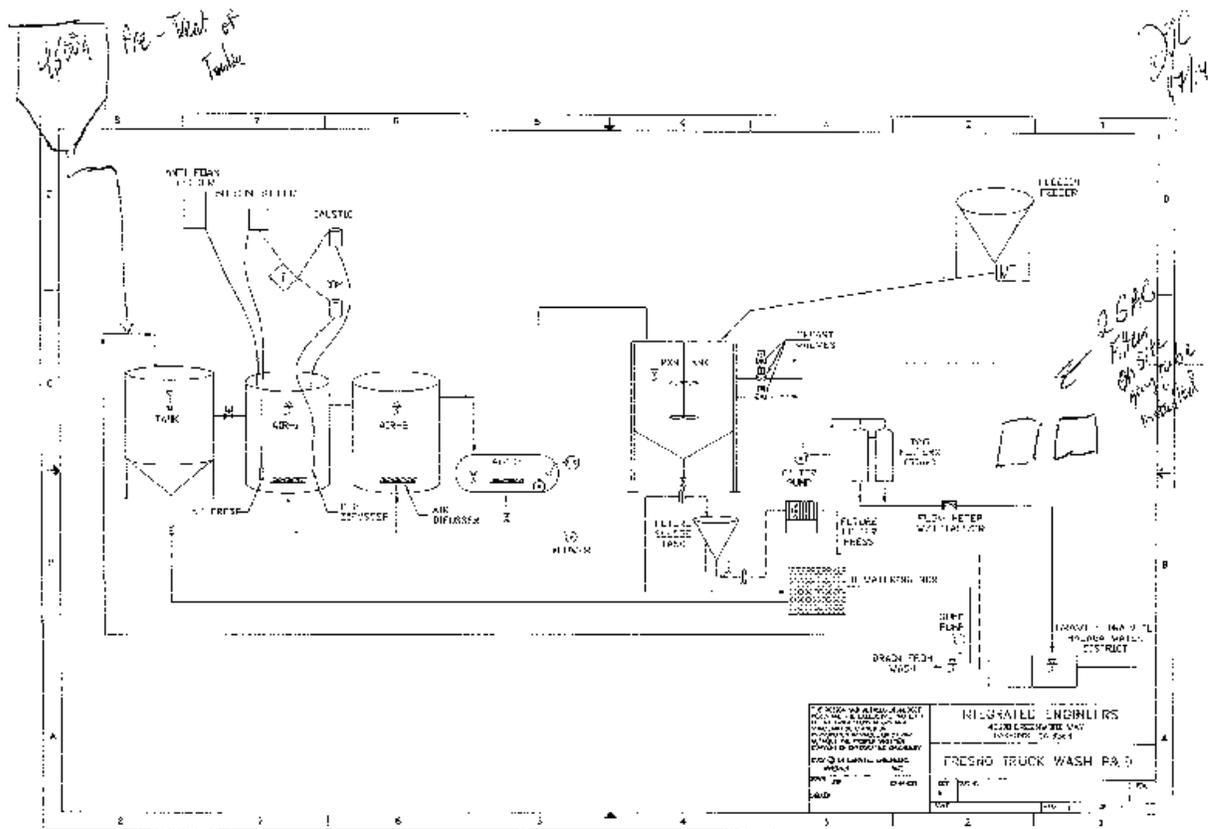
TPRICELIST

Page 1 of 1

VAN WASH - OUT PRICE LIST  
(BEFERUNT)

	COLD	HOT STEAM	ACID WASH
NO DEBRIS.....	\$25.00.....	\$40.00+.....	FLOOR..\$20.00+
LIGHT DEBRIS.....	\$28.00+.....	\$43.00+.....	WALLS...\$20.00+
MED TO HVY DEBRIS.....	\$31.00+.....	\$47.00+.....	FLOORS.\$30.00+
(HAND SCRUB)			
POTATOES.....	\$32.00+ / \$42.00+.....	\$57.00+.....	WALLS ..\$30.00+ (HAND SCRUB)

**Attachment 2  
Fresno Truck Wash  
Piping and Instrumentation Diagram/Drawing  
for the Pretreatment System**



**Attachment 3  
Fresno Truck Wash  
Tanker Wash Service Paper Work**



FRESNO TRUCK WASH  
 4170 S. BAGLEY AVE.  
 FRESNO, CA. 93725-9387  
 (559) 233-4849 FAX (559) 233-2757

*DU*  
 1/21/14 10:00

ORGANIZED WASHING LABOR ONLY SAMMY BULGARA GM. CELL# 1-559-217-5791

CARRIER Cherokee Freight Lines  
 INVOICE # 247565 PO# 50065  
 LIVE IN NO IME OUT \_\_\_\_\_  
 BLAL NUMBERS 2260621-THRU-2260700

DATE 1/21/14

TYPE OF WASHOUT

- KOSHER  TYPE 1
- CALS: C  TYPE 2
- FODDER  TYPE 3
- REGULAR  TYPE 4
- CO. WATER  TYPE 5
- AVE. WASHTEMP 2-32

PRODUCT BEING WASHED OUT

- |   |   |                                 |
|---|---|---------------------------------|
| <input checked="" type="checkbox"/> VEG O'S | <input type="checkbox"/> CRD. VEG OIL       | <input type="checkbox"/> YEAST  |
| <input type="checkbox"/> MOLASSES           | <input type="checkbox"/> COHN SYRUP         | <input type="checkbox"/> APP. F |
| <input type="checkbox"/> LIQUOR LIQUEUR     | <input type="checkbox"/> CHOCOLATE          | <input type="checkbox"/> ORANGE |
| <input type="checkbox"/> L-LACTIC ACID      | <input type="checkbox"/> FG. CANNILL        | <input type="checkbox"/> PEAF   |
| <input type="checkbox"/> HONEY              | <input type="checkbox"/> FRUCTOSE           | <input type="checkbox"/> GRAFF  |
| <input type="checkbox"/> SUCAN              | <input type="checkbox"/> FLAVORED ALCOHOL   | <input type="checkbox"/> DEBRY  |
| <input type="checkbox"/> WINE               | <input type="checkbox"/> LIQUOR CONCENTRATE | <input type="checkbox"/> MILK   |
| <input type="checkbox"/> CO. SPRING         | <input type="checkbox"/> WINEGAR            |                                 |
| <input type="checkbox"/> SOLIDAL            | <input type="checkbox"/> OTHER              |                                 |

WASHOUT CHECKLIST

- TANK INTERIOR
- TANK EXTERIOR
- HORNS
- LIGHT TUBES
- PERSOL GAPS
- INSIDE CAPS & BARREL
- PUMPS
- DOME & GASKET
- VALVES & FITTINGS
- FINAL RINSE PH LEVEL 7.0

TEMP RECORDED WASHOUT

- DATA INFORMATION SHEET
- DATA COLLECTION
- ORIGINAL LOG WITH DRIVER

SANITIZERS USED

- QUAT SANITIZER
- OTHER

LOAD OFFICER Cordova CUSTOMER Stantec

DATE 1-21-14 TRAILER NO. \_\_\_\_\_ THIS IS TO CERTIFY THAT

TRACTOR NO. 359 AND TRAILER NO. 677 TOGETHER WITH PUMP AND HOSES

PROVIDED BY THE CARRIER FOR LOADING ON \_\_\_\_\_ HAS BEEN CLEANED IN

ACCORDANCE WITH TRAILER CLEANING PROCEDURES TRAILER HAS BEEN INSPECTED AND FOUND SUITABLE FOR

TRANSPORTING FOOD GRADE PRODUCTS.

THE LAST THREE PRODUCTS HANDLED IN THIS TRAILER WERE:

	PRODUCT	SHIPPER	DATE
1	<u>Corn Meal</u>		
2			
3			

NO WASH PERSONNEL ALLOWED IN TRAILER AFTER TRAILER IS CLEANED AND DROPPED

CLEANED AND INSPECTED BY (WASH STATION EMPLOYER)

DRIVER'S NAME (PLEASE PRINT)

DRIVER'S SIGNATURE

*Sammy Bulgara*  
*Sammy Bulgara*

## **Fresno Truck Wash Photograph Log**



**Photograph 1.** Photograph of the facility's new 4,500-gallon batch treatment tank.



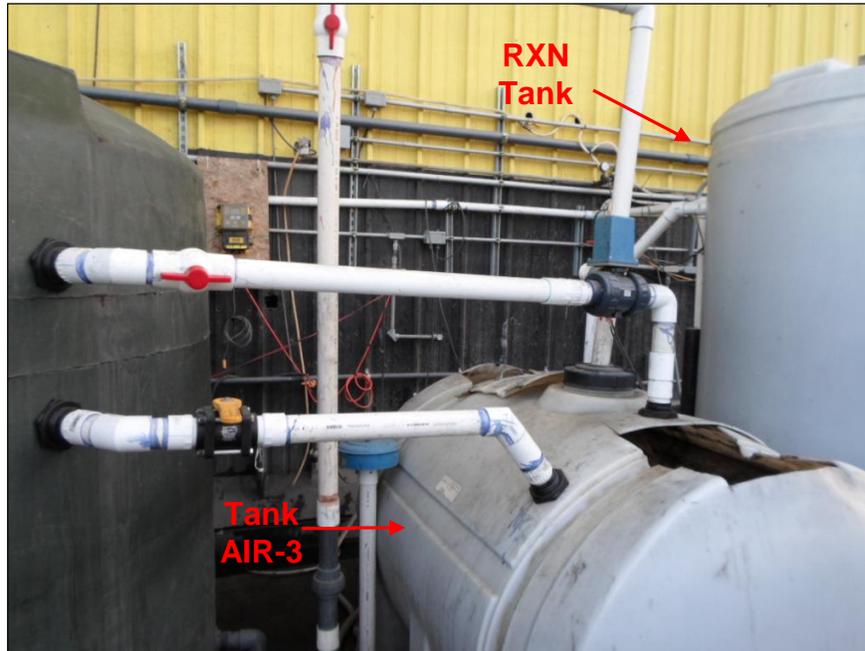
**Photograph 2.** Photograph of the batch treatment tank and EQ tank as part of the facility's wastewater treatment system. Photograph was taken from the northeast corner of the garage.



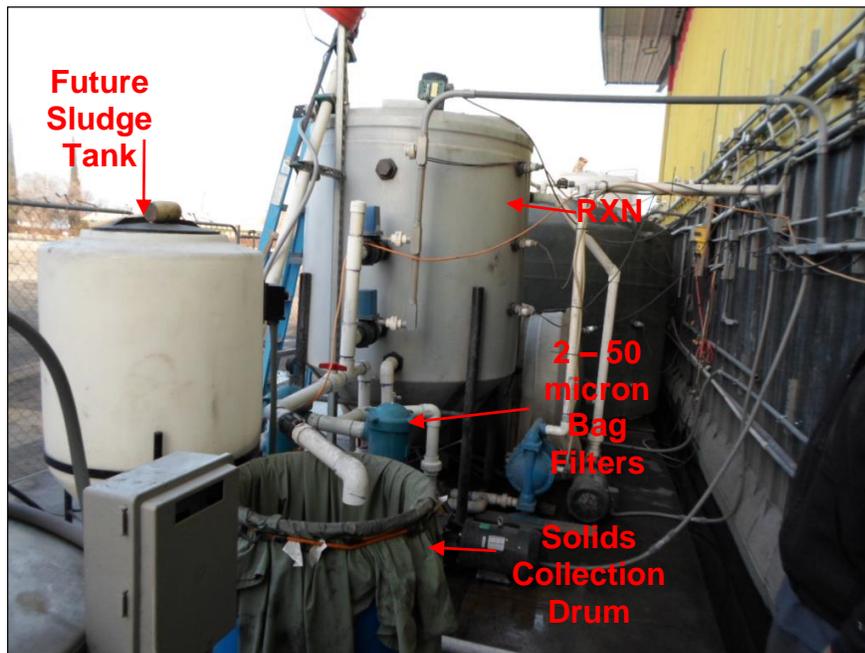
**Photograph 3.** Photograph of the pH adjustment system supporting Tank AIR-1.



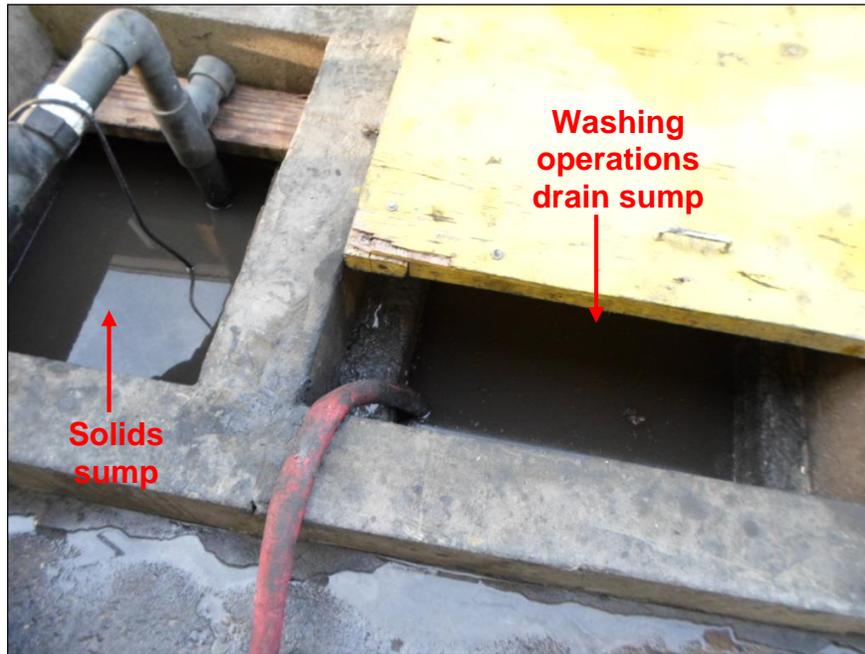
**Photograph 4.** Photograph of piping connecting Tanks AIR-1 and AIR-2. Tanks operate in series.



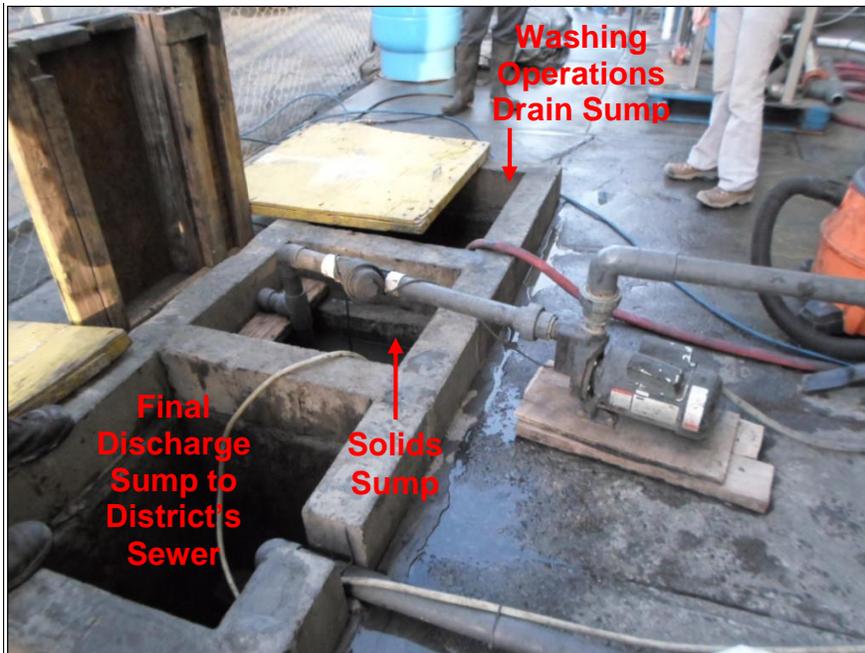
**Photograph 5.** Photograph of piping supporting the use of treatment tanks AIR-3 and RXN.



**Photograph 6.** Photograph of the final stages of the current wastewater treatment system. During the time of the inspection, effluent from the RXN Tank flowed through two 50 micron bag filters (parallel setup), through an in-line conductivity meter, a flow meter, and then into the final discharge sump.



**Photograph 7.** Photograph of the washing operations drain sump, which receives all process wastewaters, in addition to the supernatant from solids management operation.



**Photograph 8.** Photograph of the final discharge and sampling locations. Also depicted is the solids sump from which solids are pumped to the filter presses on the eastern side of the wash garage at the facility.



**Photograph 9.** Photograph of the facility representative using the portable total dissolved solids meter. The meter at the time had a reading of 890 mg/L.



**Photograph 10.** Photograph of a sample of wastewater that was collected during the inspection. The sample had some pin floc suspended in the wastewater.



**Photograph 11.** Photograph of the current solids processing operations. The drying beds were located on the south eastern side of the wash garage.



**Photograph 12.** Photograph of the smaller of two filter presses stationed on the southeastern corner of wash garage.



**Photograph 13.** Photograph of the larger of the two filters presses stationed on the south eastern side of the wash garage.

**Greentec**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Greentec						
Address of Industry: 3396 East Malaga; Fresno, CA 93725						
Date of visit: 1/07/2014			Time of visit: 2:10 p.m.			
Name of inspector(s): Jill Walsh, Central Valley Water Board Danny O'Connell, EPA Contractor, PG Environmental LLC						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Jack Wilson		President		559-237-4700		
IU Permit Number: 1078		Exp Date: 12/31/2016		IU Classification: Non-Residential Wastewater Discharger, Class II.		
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
	<input type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint
Please provide the following documentation:						
1. Nature of operation: The facility cleaned and washed 55-gallon drums in addition to large volume totes that were received from a variety of different companies (mostly dairy related industries). The cleaning and washing processes included the removal of labels from the drums and totes and washing out the interior of the container.						
2.	Number of employees	8	Number of shifts:	1	Hours of operation:	See note 1 of the Notes section of the report.
3. Water source: Malaga County Water District (District).						
4. Wastestream flow(s) discharged to the POTW: The facility discharges pretreated cleaning and wash waters from the drum and tote washing operations to the sanitary sewer.						
Sanitary:	Not reviewed (N/R).	Process:	N/R.	Combined:	See note 2 of the Notes section.	
5. Describe any significant changes in process or flow: No significant changes were observed during the inspection. The District did not have a file for this facility. Therefore, prior inspection reports were not available for review by the audit team in an effort to provide a bench mark for the facility's typical operations.						
6. Type of pretreatment system (Describe): The facility's pretreatment system consists of a 2,000 gallon three-stage clarifier, a paper filter unit, a pH adjustment system (refer to photograph 4 of the attached photograph log), two cartridge filters (refer to photograph 5 of the attached photograph log), four sock-type filters (refer to photograph 5 of the attached photograph log), three granular activated carbon (GAC) filters (refer to photograph 7 of the attached photograph log), and a 600 gallon holding tank system. Photographs of the various treatment units are provided in the attached photograph log.						
	Continuous flow	<input type="checkbox"/>	Batch	<input checked="" type="checkbox"/>	Combined	
7. Condition/operation of pretreatment system (Describe): The pretreatment system was located outside, under a covered area. Secondary containment structures were not provided for the system. It appeared that spills or leaks from the system would drain to the adjacent parking/driveway area. The pretreatment system consisted of a mix of treatment technologies and various units networked together to improve wastewater quality. The treatment units were clean. The structures did not appear to be damaged or						

<p>rusted. There were no signs of spills or leaks within the pretreatment system area at the time of the inspection.</p>			
<p>Any unusual conditions or problems with the pretreatment system: The paper filter unit's piping had a valve which may be positioned so that the treatment unit had the ability to be bypassed. The valving was in the "operational" position during the inspection. See note 3 in the Notes section for further detail.</p>			
<p>8. Process area description (identify raw materials and processes used): The facility had a large interior washing and storage area. The storage area had approximately six rows of 250-gallons totes that had been cleaned. Each row varied in length and had between 4 to 6 stacks of totes. The typical stack was four totes high. The clean 55-gallon drums were also stacked and organized into blue and white drums areas. There were approximately 200 drums stacked in columns, three drums high. The areas immediately surrounding the stacked totes and drums were not inspected.</p>			
<p>9. Condition/operation of process area (Describe): The interior of the facility was wet, clean of debris, and organized.</p>			
<p>Any unusual conditions or problems with the process area: For the process areas that were inspected, it was determined that no unusual conditions or problems were observed with the process area during the time of the inspection.</p>			
<p>10. General housekeeping in process area (Describe): The process areas were wet. The end of the day cleanup operations had just been completed. No free debris or leaking chemicals were observed.</p>			
<p>Any unusual conditions or problems with general housekeeping in process area: There were no unusual conditions or problems observed with the general housekeeping of the process area during the time of the inspection.</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The pretreatment pad had 55-gallon drums of potassium hydroxide, phosphoric acid, and polymer. Secondary containment structures were not provided for these chemicals.</p>			
Any floor drains?	See note 4 in the Notes section.	Any spill control measures?	No.
<p>General housekeeping of chemical storage area (Describe): The drums used for the storage of pretreatment chemicals appeared to be in good condition and did not have any leaks. See note 5 in the Notes section for additional information concerning chemicals onsite.</p>			
<p>12. Are hazardous wastes drummed and labeled? This component was not reviewed as part of the inspection.</p>			
<p>13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection.</p>			
<p>Any problems associated with hazardous waste: N/R.</p>			
<p>14. Solid waste production: The facility generated a large volume of solids through its label removal process. The solids/sludges were captured in screens, nets, and filters (paper sheet, canister, sock, and GAC). The attached photograph log contains photographs of the various treatment technologies used for solids removal. The solids collected were disposed of in regular trash bins for of site disposal (refer to photo 11 of the attached photograph log).</p>			
<p>Solid waste disposal method(s): Dried solids are hauled offsite for disposal.</p>			
<p>15. Description of sample location: Samples were collected from the final holding tank.</p>			
<p>Sampling method/technique: Samples are collected as grabs from the final holding tank.</p>			
16. Evaluation of self-monitoring data?	Yes	X No	N/A
<p>If yes, was self-monitoring adequate: Not applicable (N/A).</p>			
<p>17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection.</p>			
<p>Notes:</p>			

1. The facility's specific hours of operation were not discussed during the inspection. However, the facility had already shut down operations for the day, prior to the start of this inspection at 2:10 p.m. The facility operates Monday through Friday. The facility was not discharging wastewater during the time of the inspection.
2. The facility used a spray gun with a four gallon per minute flow rate to wash totes and drums. The facility representative stated that it takes approximately two gallons per barrel/drum and eight gallons per 250-gallon tote to complete the cleaning and washing operation. In a normal week, the facility processes 120 totes and 350 to 400 barrels/drums. A typical weeks' operations would generate a total water usage of approximately 1,760 gallons of wastewater or approximately 350 gallons per day based on the information presented by the facility representatives. The washing area was located in a warehouse.
3. The paper filter unit had piping valves in two locations which would allow this unit to be bypassed (refer to photo 3 of the attached photograph log). The valves were positioned at the time of the inspection to deliver wastewaters to the paper filter. The facility representatives stated that they do not use the bypass valving and would remove the valves if requested. The audit team strongly recommends that the District have the facility remove or lock out the bypass valve. If the bypassing capabilities are required for certain operating and maintenance conditions, then a written standard operating procedure shall be developed so that the pretreatment and quality of wastewater are not compromised.
4. The washing area had a screened, floor trench that drained to the facility's three stage clarifier. Any spills or leaks of concentrated soaps or cleansers would drain to the floor trench and ultimately the pretreatment system. The concrete in the washing area was heavily pitted (refer to photo 1 of the attached photograph log). The cause of the pitting was not identified during the inspection.
5. The facility had soaps and cleansers for the washing and cleaning operations. The solutions used in the washing and cleaning operations were not identified during this inspection, due to time. The facility was in the final stages of closing for the day. The pretreatment system was the main focus of the facility inspection.
6. If there was a spill or leak from one of the three 55-gallon drums of pretreatment chemicals, the released chemicals would run into a parking /driveway area. Concerns associated with a spill or leak of pretreatment chemicals or a failure of one of the pretreatment units were not discussed with facility representatives.
7. Some areas outside of the warehouse were wet and the pooling of water was observed (refer to photo 9 of the attached photograph log). The waters did not appear to be flowing off of the facility's property.
8. A pile of wet debris was observed adjacent to a trash bin in the facility's dirt lot (refer to photo 12 of the attached photograph log). The Central Valley Water Board representative reviewed the cause and concerns with facility representatives.
9. At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team for each of the facilities visited during the audit. The new, unissued permit for the facility had an expiration date of 12/31/2014.

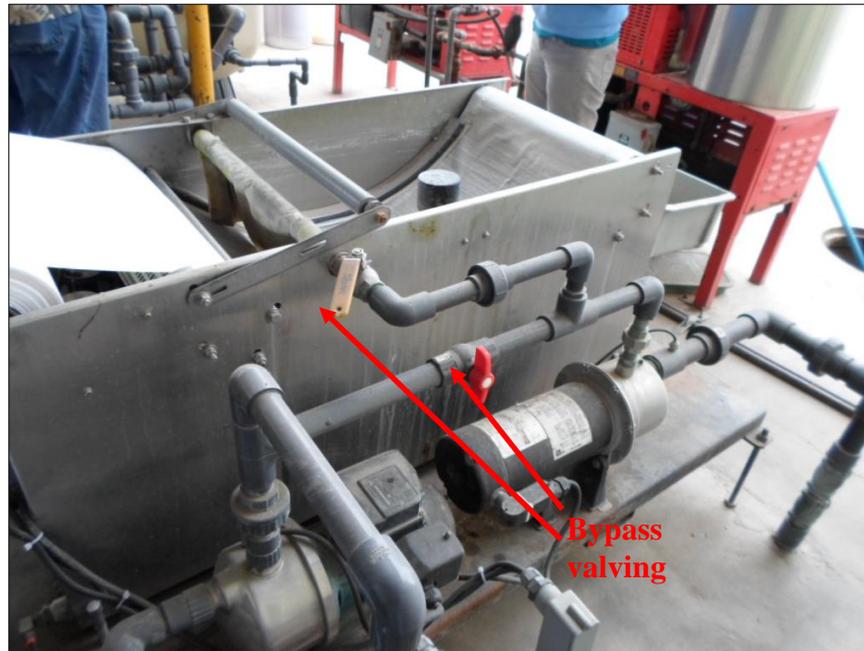
## **Greentec Photograph Log**



**Photograph 1. Photograph of the facility’s cleaning and washing area. The floor trench has a fine screen cover to help remove labels and general debris from the wash waters.**



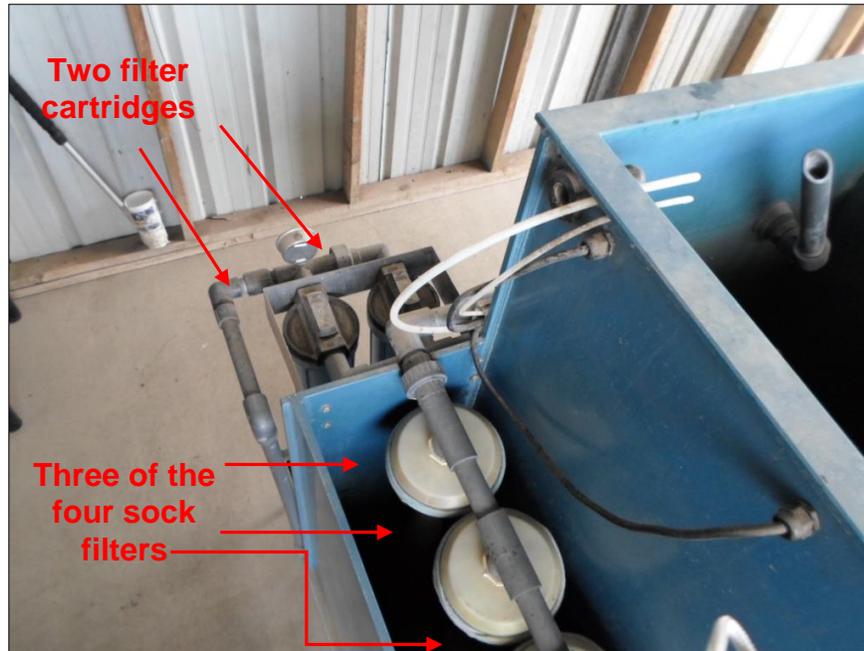
**Photograph 2. Photograph of the first stage of a three stage clarifier. Note the pool skimmer positioned around the influent pipe in an effort to capture additional paper and solids from the cleaning and washing operations.**



**Photograph 3.** Photograph of the paper filter unit. Wastewater flows through the paper which removes glues and general debris. Note the bypass valving. The valving is positioned to treat wastewaters.



**Photograph 4.** Photograph of pH adjustment system. This system appeared to be an old metal precipitation treatment unit. The facility uses the system for pH adjustment and filtration (next photo).



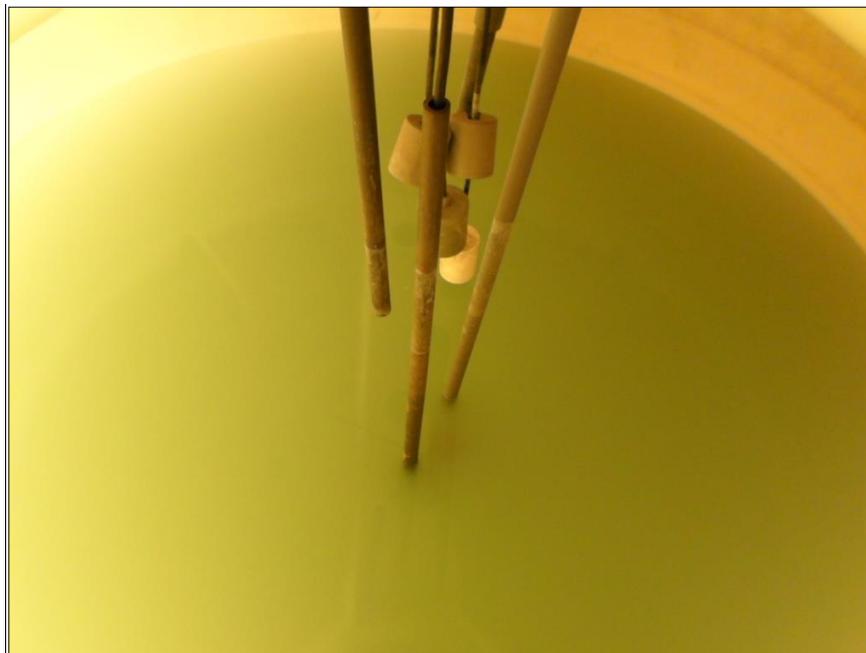
**Photograph 5.** Photograph of the cartridge system and sock filters immediately downstream of pH adjustment tanks. All filters ran in parallel.



**Photograph 6.** Photograph of three 55-gallon drums of chemicals used for wastewater treatment (potassium hydroxide, phosphoric acid, and polymer).



**Photograph 7.** *Foreground:* Note that secondary containment structures are not provided for the drums of treatment chemicals. *Back ground left side:* Note the three carbon filters used to polish treated wastewater.



**Photograph 8.** Photograph of treated wastewater in the final holding tank before discharge. District collects compliance samples from inside the holding tank.



**Photograph 9.** Photograph of the rear of the facility. The facility was closing for the day at the time of the inspection. The concrete pad appears to have been washed down and drained to the back lot area (note that the lot was not paved, that the water was pooling in areas, and not running offsite).



**Photograph 10.** Photograph of sock filters drying before final disposal in trash bin.



**Photograph 11. Photograph of dried sock filters in trash bin.**



**Photograph 12. Photograph of the wet debris in the dirt lot adjacent to trash bin. This observation was discussed with facility representative by the Central Valley Water Board representative.**

**Inland Star Distribution Centers**  
**Site Visit Data Sheet**

## SITE VISIT DATA SHEET

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Inland Star Distribution Centers						
Address of Industry: 3146 South Chestnut Avenue; Fresno, CA 93745						
Date of visit: 1/07/2014			Time of visit: 10:30 a.m.			
Name of inspector(s): Jill Walsh, Central Valley Water Board Danny O'Connell, EPA Contractor, PG Environmental LLC						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Randel Mathias		Executive Vice President		559-237-2052, extension 1144		
Garry Chapman		Director of Environmental, Health and Safety		559-237-2052, extension 1125		
IU Permit Number: 1012		Exp Date: 12/31/16		IU Classification: Non-Residential Wastewater Discharger, Class II. See note 7 in the Notes section.		
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>		Unscheduled	<input checked="" type="checkbox"/>
		PCI	<input type="checkbox"/>		New Company	<input type="checkbox"/>
Please provide the following documentation:						
1. Nature of operation: The facility provides warehousing and transportation services for a variety of agriculture, chemical, auto supply, and food products. The facility had multiple buildings with multiple rooms and none of these areas had 'wet' operations.						
2. Number of employees	50		Number of shifts:	Vary based on needs.	Hours of operation:	Monday through Friday, 6:30 a.m. to 8:30 p.m.
3. Water source: Malaga County Water District (District).						
4. Wastestream flow(s) discharged to the POTW: The facility discharges only domestic wastewaters to the sanitary sewer.						
Sanitary:	Not reviewed (N/R).		Process:	N/R.	Combined:	N/R.
5. Describe any significant changes in process or flow: No significant changes were reported during the inspection. The facility representative stated that they would provide re-packaging services for some of their clients. The service would be conducted outside, between two of the warehouse structures in an area without drains. See note 4 in the Notes section for more details concerning re-packaging operations.						
6. Type of pretreatment system (Describe): The facility does not have a pretreatment system. The facility does have a large volume of containment capacity to contain liquids generated from a fire or major spill.						
	Continuous flow		Batch		Combined	
7. Condition/operation of pretreatment system (Describe): Not applicable (N/A). Any unusual conditions or problems with the pretreatment system: N/A.						
8. Process area description (identify raw materials and processes used): The facility offered warehouse and transportation services for a large variety of solid and liquid products. The facility had employees that were trained to handle hazardous materials. The facility had four separate buildings that provided 385,000 square feet (sq. ft.) of storage. The facility also had areas designed for the storage of flammable						

<p>materials. The facility’s truck wells were incorporated into the storage spill management plan. The warehouses did not have floor drains to the sewer. The facility also had an additional holding pond for emergency conditions. The holding pond was lined with what appeared to be a black synthetic (observation was made through a fence, from approximately 15 feet away).</p>			
<p>9. Condition/operation of process area (Describe): The interior of the warehouses were dry, clean of debris, and organized. Spill kits were available at multiple locations within the warehouse rooms.</p>			
<p>Any unusual conditions or problems with the process area: N/A.</p>			
<p>10. General housekeeping in process area (Describe): The warehouses were neat, clean, organized, and dry. No debris or leaking chemicals were observed.</p>			
<p>Any unusual conditions or problems with general housekeeping in process area: There were no unusual conditions or problems noted with the process area during the time of the inspection.</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): Some of the warehouse materials were stored in bulk and some were packaged smaller containers. All materials in the warehouse structures were protected by the containment system described in previous sections of this report.</p>			
Any floor drains?	No.	Any spill control measures?	Yes.
<p>General housekeeping of chemical storage area (Describe): N/R.</p>			
<p>12. Are hazardous wastes drummed and labeled? This component was not reviewed as part of the inspection.</p>			
<p>13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection.</p>			
<p>Any problems associated with hazardous waste: N/R.</p>			
<p>14. Solid waste production: This component was not reviewed as part of the inspection.</p>			
<p>Solid waste disposal method(s): N/R.</p>			
<p>15. Description of sample location: The facility only discharges domestic wastewater.</p>			
<p>Sampling method/technique: N/A.</p>			
16. Evaluation of self-monitoring data?	Yes	X No	N/A
<p>If yes, was self-monitoring adequate: N/A.</p>			
<p>17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection.</p>			
<p>Notes:</p>			
<p>1. The primary facility representative for the inspection process was concerned that this inspection was a follow-up to the facility’s discharge of holding pond water to the sanitary sewer system. The representative was informed that the audit team was aware of the event; however, this inspection was a component of the District’s pretreatment program audit.</p> <p>2. The facility’s management team stated they were in the process of evaluating their operational plans.</p> <p>3. The facility representatives stated that the facility had a spill response plan. In response to the audit team’s request to see the spill response plan, the facility representative stated that he would forward a copy if needed after the inspection. The representative was informed that the inspection report would require the District to formally review the spill response plan. The District is required to formally evaluate the facility for the need of a slug discharge control plan. The evaluation should include a formal review of the facility’s operation plans.</p> <p>4. The facility representatives stated that they provide a re-packing service. The re-packing service involved transferring bulk liquids or powders into smaller volume containers. The process is performed in an</p>			

outdoor area, between two buildings, where there are not drains. The actual process was reported to be contracted out to subcontractors. The subcontracts are responsible for management of all wastes generated (wastes are not disposed of onsite). The District is required to formally evaluate the re-packing operations to ensure that waste generated from the re-packing process are properly managed and not discharged to the sewer system.

5. No liquid wastes or wastewaters were observed during the facility inspection.
6. The facility had multiple bathrooms in various locations.
7. At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team. The new, unissued permit for the facility had an expiration date of 12/31/2016.

**PPG Industries**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: PPG Industries						
Address of Industry: 3333 S. Peach Avenue; Fresno, CA 93725						
Date of visit: 01/07/2014			Time of visit: 10:45 a.m.			
Name of inspector(s): Chris Lopes, Code Enforcement Inspector, Malaga County Water District (District) Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Jim Polek, EPA Region 9 Aide Ortiz, Central Valley Water Board						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Keith Galnes		Process Engineer		559-493-3276		
Ruth Santhos		Environmental Engineer		559-647-2539		
IU Permit Number: 1038		Exp Date: 12/31/2014 See note 8 of the Notes section for addition details.		IU Classification: Non-Residential Wastewater Discharger, Class I.		
Inspection Type/Purpose	X	Scheduled		Unscheduled	X	PCA
		PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility manufactures flat glass using a float glass process. In addition, the facility sizes, cuts, packages, and ships the glass products in accordance with customer requests and specifications. At the time of the site visit, the facility was producing approximately 520 tons of glass per day.						
2. Number of employees	140	Number of shifts:	3	Hours of operation:	24 hours per day, seven days per week.	
3. Water source: Malaga County Water District						
4. Wastestream flow(s) discharged to the POTW: The facility discharges pretreated compressor, cooling tower, and boiler blowdown water to the sanitary sewer.						
Sanitary:	Not applicable (N/A).	Process:	40,000-45,000 gallons per day (gpd).	Combined:	N/A.	
5. Describe any significant changes in process or flow: There were no significant changes in process or flow noted during the time of the inspection.						
6. Type of pretreatment system (Describe): The facility conducts pH adjustment of facility cooling tower and boiler blowdown water. The facility hired a consultant, ChemTreat Services, to monitor and treat wastewaters generated at the facility. The facility representatives stated that the consultant visits the facility on a monthly basis in order to check the system and to discuss pump operation procedures with facility personnel who are responsible for operating the pumps. In addition, the facility maintenance department performs weekly inspections of the wastewater system to ensure proper operation and maintenance of the system. A representative of ChemTreat Services was not present during the site visit.						

Each of four compressors located in the main compressor room is connected to individual oil/water separators. The facility representatives stated that the oil/water separators were installed in April/May 2013 and primarily receive compressor blowdown. It was undetermined by the EPA audit team whether the effluent from the oil/water separators is combined with pretreated cooling tower and boiler blowdown water, or if there was a separate connection to the sanitary sewer. See note 1 in the Notes section of this report for additional details regarding the compressor room.

Furthermore, the facility has a frit pit that is no longer in operation. The frit pit had been used for waste storage and is equipped with out-of-service pumps that still contain residual oil. See note 2 in the Notes section of this report for additional details regarding the frit pit.

X	Continuous flow		Batch		Combined
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7. Condition/operation of pretreatment system (Describe): The pretreatment system appeared to be operating properly at the time of the inspection.

Any unusual conditions or problems with the pretreatment system: There were no unusual conditions or problems observed with the pretreatment system during the time of the inspection.

8. Process area description (identify raw materials and processes used): Multiple process areas were observed during the site inspection:

- Compressor room—The compressor room housed four primary compressors used for facility operations. The facility representatives stated that each of the four compressors was connected to an individual oil/water separator, and had been since April/May 2013.
- Raw materials unloading area—The facility received various raw materials via railcar and truck. Railcars and trucks entered the southeast corner of the facility and unloaded the raw materials into storage silos. Raw materials maintained onsite included sand, limestone, dolomite, soda ash, cullet, and ferrous oxide. In addition, a 20,000-gallon caustic soda tank located within a concrete secondary containment structure was located in this area. The raw materials blending plant was also located in this area of the facility.
- Cooling towers and wastewater treatment—Cooling tower blowdown and boiler blowdown was adjusted for pH in this area of the facility. Wastewater operations were conducted and managed by a consultant, ChemTreat Services. A representative of ChemTreat Services was not present to further discuss wastewater treatment operations during the site visit; however, the wastewater treatment system appeared to be properly operating at the time of the site visit. In addition, used oil and other spent chemicals were maintained in this area of the facility. The used oil and spent chemicals were stored in 55-gallon drums in a covered and contained area, adjacent to the wastewater treatment system.
- Scrubber—The facility operated a scrubber on the southwest side of the facility, adjacent to the furnace. The facility representatives stated that exhaust gas and particulates from the furnace were blown into the scrubber. Caustic soda and water were injected into the scrubber at multiple locations to capture the particulates. The caustic soda, water, and particulate flocculent solution dripped out of the bottom of the scrubber and were reintroduced into the mixed batches of raw materials.
- Float glass furnace—The facility representative explained that a mixed batch of raw materials from the blend plant is introduced into the furnace for the production of flat glass using a float glass

process. The furnace is powered by oxygen (from the onsite Air Products and Chemicals, Inc. cryogenic air separation plant) and natural gas. The mixed batch is melted in the furnace and drawn out in the form of a viscous glass ribbon. The viscous glass ribbon is floated across a bath of molten tin and formed into various thicknesses and widths. The molten tin bath is constantly being replenished with tin. From the molten tin bath, the glass ribbon is hardened, sized, cut, packaged, and shipped per customer specifications and request.

9. Condition/operation of process area (Describe): The following was noted regarding the condition of the process area during the inspection:

- Compressor room—The room was crowded due to the size of the four compressors. See note 1 in the Notes section of this report for additional details regarding the compressor room.
- Raw materials unloading area—Raw material unloading activities were occurring at the time of the site visit.
- Cooling towers and wastewater treatment area—This area contained the cooling towers, the wastewater treatment system, and the chemical storage areas. The area was clean and free of debris.
- Scrubber—The scrubber was located on the south side of the float glass furnace building, adjacent to where mixed batches were fed into the float glass furnace. The scrubber was equipped with a water softening unit. The EPA audit team did not evaluate the condition of the scrubber.
- Float glass furnace—This area of the facility housed the float glass furnace and molten tin bath. The area of the facility was extremely loud and hot. The cutting, packaging, and warehousing sections of the facility were located on the north side of this area of the facility.

Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the time of the site visit.

10. General housekeeping in process area (Describe):

- Compressor room—An oil leak was observed underneath one of the four primary compressors located in the compressor room located on the south side of the facility. See note 1 in the Notes section of this report for additional details regarding the compressor room.
- Raw materials unloading area—This area was very dusty and raw material residues were present throughout the area. In addition, the area to the southwest of the raw material unloading area was used for the stockpiling and storage of cullet (shards of off-spec glass) that will be re-melted and reintroduced into the process.
- Cooling towers and wastewater treatment area—This area of the facility was relatively clean and uncluttered. Chemicals were stored in contained and covered areas.
- Scrubber—This outdoor area was very dusty and raw material residues were present throughout the area as a result of mixed batches entering the float glass furnace.

<ul style="list-style-type: none"> <li>• <u>Float glass furnace</u>—Minor ash and material accumulation was observed on the floor of this area; however, the pedestrian walkways were clean and free of debris. The cutting and packaging areas were also clean and free of debris.</li> </ul>			
<p>Any unusual conditions or problems with general housekeeping in process area: Yes. See note 1 in the Notes section of this report for additional details regarding the compressor room.</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility representatives stated that over 600 hazardous chemicals were maintained onsite. A 20,000-gallon tank of caustic soda located within a concrete secondary containment structure was located adjacent to the raw materials unloading area and blending plant. Miscellaneous chemicals (including used oil, spent chemicals, and wastewater adjustment chemicals) were observed covered and stored in secondary containment at the cooling tower and pretreatment system area of the facility. The entrances to the covered chemical storage areas were bermed and locked.</p>			
Any floor drains?	No.	Any spill control measures?	Concrete secondary containment structure.
<p>General housekeeping of chemical storage area (Describe): The pH adjustment chemical tanks housed in the cooling towers and wastewater treatment area were labeled and had secondary containment. In addition, the separate chemical storage areas were labeled. The drums and chemicals located in the chemical storage areas were labeled and were stored in covered and contained areas.</p>			
<p>12. Are hazardous wastes drummed and labeled? Yes. Hazardous waste generated at the facility’s electrostatic precipitator unit was stored in electrostatic precipitator sacks.</p>			
<p>13. Does the IU have hazardous waste manifests? Yes.</p>			
<p>Any problems associated with hazardous waste: Yes. See note 3 in the Notes section of this report for additional details regarding hazardous waste.</p>			
<p>14. Solid waste production: The facility produces solid waste in the form of fly ash, particulate hazardous waste, and cullet.</p>			
<p>Solid waste disposal method(s): Fly ash and particulate waste are hauled offsite by a contractor for proper disposal. Cullet is stockpiled onsite and reused in the facility processes.</p>			
<p>15. Description of sample location: The facility’s discharge location is at an effluent lift station in the southwest corner of the facility. Monitoring equipment at the lift station includes a flow meter, pH meter, and electrical conductivity (EC) meter; the equipment is checked daily by facility personnel according the facility representatives. See notes 4 through 7 in the Notes section of this report for additional details regarding the facility’s sample location.</p>			
<p>Sampling method/technique: The facility’s permit requires both grab and composite samples to be collected.</p>			
16. Evaluation of self-monitoring data?	Yes	X No	N/A
<p>If yes, was self-monitoring adequate: Not reviewed.</p>			
<p>17. Who performs the self-monitoring analysis? BC Laboratories performs the self-monitoring collection and analysis for the facility.</p>			
<p>Notes:</p>			
<p>1. The EPA audit team observed an oil leak in the compressor room during the site inspection. The facility representatives stated that the oil leak was identified by the maintenance department earlier that day and was awaiting repair. The oil leak was contained to the compressor room. It is recommended that the District follow up with the facility to ensure that the leaked oil is properly disposed of and that the compressor leak is fixed.</p>			

2. The frit pit was used in the past for storing solid waste and is still equipped with out-of-service pumps that contained residual oil. The frit pit accumulates stormwater runoff from the southern portion of the facility. Currently, stormwater that accumulates in the frit pit is pumped to an onsite stormwater pond. Due to the potential for the oil residue from the existing pumps to make contact with stormwater, the facility representatives stated that the facility plans to install an oil/water separator to remove oil from accumulated stormwater prior to sending the stormwater to the onsite stormwater pond. A District inspection report from October 29, 2013 states that the facility plans to install the oil/water separator by March 2014. Stormwater was not present in the frit pit at the time of the site visit.
3. The facility had two large stockpiles of hazardous waste (electrostatic precipitator sacks) onsite at the time of the site visit. The facility representatives stated that the facility last had a Certified Unified Program Associations (CUPA) hazardous waste inspection in August 2013. They stated that the electrostatic precipitator sacks are non-Resource Conservation and Recovery Act (RCRA) hazardous waste; however, are considered hazardous by California regulations. The facility representatives stated that the facility was researching a new disposal location for the electrostatic precipitator hazardous waste; however, the waste had not exceeded an onsite storage timeframe per California regulations. The EPA audit team observed a stockpile of hazardous waste outside near the frit pit on the east side of the facility and outside near the scrubber on the south side of the facility.
4. The facility representatives stated that the facility was preparing to make upgrades to the current effluent lift station and to remove the monitoring equipment that was there at the time of the inspection. It is recommended that the District follow up with the facility regarding the planned modifications to the facility's effluent lift station and discharge location.
5. The facility representatives stated that self-monitoring samples were collected at the facility's effluent lift station/discharge location. Samples are collected downstream of where the facility's wastewater comingles with wastewater generated at the onsite Air Products and Chemicals, Inc. plant. In addition, the facility representatives stated that the facility's domestic wastewater is tied into the facility's discharge line upstream of the effluent lift station/sampling point. Therefore, samples collected by the facility and District are not representative solely of the facility's industrial wastewater discharge. Furthermore, the facility representatives stated that the facility was unable to collect a representative sample of the facility's industrial wastewater discharge because the only accessible location to the discharge is considered as a confined space, and the facility does not allow its employees to enter confined spaces. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. It is required that the District reevaluate the facility's discharge monitoring location to ensure that self-monitoring samples are representative solely of the facility's industrial wastewater discharge.
6. After the site inspection, the EPA audit team along with the District code enforcement inspector visited the District's compliance sample collection location. The District collects compliance samples of the facility's discharge at a manhole located west of the facility at the intersection of South Willow Avenue and a railroad track. The manhole was downstream (and west) of the facility's effluent lift station and discharge location. As noted above in note 5, the facility's domestic wastewater along with industrial wastewater from the Air Products and Chemicals, Inc. plant are tied into the facility's discharge line, upstream of the effluent lift station and the District's sampling manhole. However, 40 CFR

403.12(b)(ii) state that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. It is required that the District reevaluate the District's compliance sampling monitoring location to ensure samples are representative solely of the facility's industrial wastewater discharge.

7. Part 3 Item 2(a) of the facility permit states that "the permittee must monitor outfall 001" for all required parameters. The permit does not include a description of the sampling location for "outfall 001." The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include a sampling location. During the site visit, the EPA audit team was unable to determine if samples were being collected at the intended location due to the vagueness of the sampling location description in the permit. The District is required to include a detailed description of the facility sample location in the permit to ensure that samples collected for both compliance and self-monitoring purposes are collected at the same location in order to ensure consistency across collected samples.
8. At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team for each of the facilities visited during the audit. The new, unissued permit for the facility had an expiration date of 12/31/2014.

**Stratas Foods**  
**Site Visit Data Sheet**

**SITE VISIT DATA SHEET**

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Stratas Foods						
Address of Industry: 3390 South Chestnut Avenue; Fresno, CA 93725						
Date of visit: 01/07/2014			Time of visit: 2:00 p.m.			
Name of inspector(s): Chris Lopes, Code Enforcement Inspector, Malaga County Water District (District) Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Jim Polek, EPA Region 9 Aide Ortiz, Central Valley Water Board						
Provide the name(s) and title(s) of industry representative(s)						
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>		
Joe Anderton		Plant Superintendent		559-495-4506		
Veronica Perez		Environmental Specialist		559-495-4506		
Bryce Elms		Engineer		559-495-4506		
Miguel Perez		Engineer		559-495-4506		
IU Permit Number: 1008		Exp Date: 12/31/2014; See note 4 of the Notes section for addition details.		IU Classification: Non-Residential Wastewater Discharger, Class I.		
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
	<input type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint
Please provide the following documentation:						
1. Nature of operation: The facility receives various edible oils (e.g., vegetable, canola, soybean, corn, etc.) in liquid and solid form via railcar. The facility then repackages the oil into smaller containers and distributes it for the food service industry.						
2.	Number of employees	Approximately 55	Number of shifts:	3	Hours of operation:	24 hours per day, Monday through Friday.
3.	Water source: Malaga County Water District					
4.	Wastestream flow(s) discharged to the POTW: The facility discharges pretreated floor and equipment sanitation wash waters and cooling tower blowdown to the sanitary sewer. The facility representatives stated that the vast majority of sanitation wastewaters generated at the facility are from floor washing activities and that only a very small amount of water is used to sanitize the equipment. All sanitation wastewaters generated at the facility are collected via floor and trench drains throughout the facility's process areas.					
Sanitary:	N/A.		Process:	8,000-12,000 gallons per day (gpd).	Combined:	N/A.
5.	Describe any significant changes in process or flow: There were no significant changes in process or flow noted during the time of the inspection.					
6.	Type of pretreatment system (Describe): The facility removes grease and oil from its wastewater utilizing a cavitation air flotation (CAF) aeration unit. Sanitation wastewaters and cooling tower blowdown are collected and received by a 12,000-gallon primary wastewater reservoir. Wastewater spills					

from the top of the primary reservoir into a central chamber. From there, it is pumped to the CAF unit where ejection nozzles inject ambient air into the wastewater to enhance the floatation of particles within the wastewater.

Polymers and flocculants are not used in the CAF unit to promote solids floating or settling. Floating solids are skimmed from the top of the wastewater that is passing through the flotation area of the CAF unit and pumped to what the facility representatives referred to as the “190” storage tank. The “190” storage tank is cleaned every six weeks. The solids from the tank are hauled offsite by a grease contractor.

Effluent from the CAF unit is returned to the primary wastewater reservoir. Once the facility is ready to batch discharge to the sanitary sewer, the wastewater from the primary wastewater reservoir (a combination of incoming wastewater from the facility’s process areas and wastewater that has been continually cycling through the CAF unit) is sent through the CAF unit one more time. Wastewater that does not meet the electrical conductivity (EC) threshold is sent to one of two additional 12,000-gallon reservoirs for storage and eventually for further treatment. If the wastewater effluent from the CAF unit meets the EC threshold at the unit’s effluent discharge location, the return valve that sends wastewater back to the primary reservoir is closed and the wastewater is discharged to the sanitary sewer. The facility batch discharges approximately 3,000–4,000 gallons at a time approximately three times each day.

Continuous flow	X	Batch		Combined
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7. Condition/operation of pretreatment system (Describe): The pretreatment system appeared to be operating properly at the time of the inspection; however, the facility recently installed new wastewater meters at the CAF unit. See note 1 of the Notes section of this report for additional details.

Any unusual conditions or problems with the pretreatment system: There were no unusual conditions or problems observed with the pretreatment system during the time of the inspection.

8. Process area description (identify raw materials and processes used): Two process areas at the facility were inspected during the site visit:

- Tank farm – The facility had eighteen 200,000-pound storage tanks grouped in a tank farm located inside the southwest portion of the facility. The tanks were used for bulk storage of the various edible oils that are repackaged at the facility. The tank farm had two trench drains with a communal sump that led to the facility’s pretreatment system. The trench drains received wash water from tank washing activities. Due to personal protective equipment requirements, the EPA audit team did not enter the tank farm.
- Production line – Product from the tank farm was piped to the production line and repackaged into customer-specific containers through a series of filling machines and conveyer systems. Product was being repackaged into one-gallon containers during the time of the inspection. Due to active production occurring, the EPA audit team briefly inspected this process area. Multiple floor drains were observed throughout the process area. Facility representatives stated that all floor drains in the production line area were gravity-fed to the facility’s pretreatment system.

9. Condition/operation of process area (Describe): The process areas observed during the inspection were very clean and uncluttered. The floor in the production line area was somewhat wet due to production activities occurring during the site visit.

Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the time of the site visit.

10. General housekeeping in process area (Describe): The process areas were very clean and free of debris. The floor in the production line area was somewhat wet due to production activities occurring during the site visit. It was undetermined by the EPA audit team whether the floor wetness was the result of recent sanitation practices.			
Any unusual conditions or problems with general housekeeping in process area: No unusual conditions or problems were observed with the general housekeeping of the process area during the inspection.			
11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility representatives stated that a 500-gallon tank of diesel fuel was maintained onsite; however, the tank was not visited as a component of the facility inspection. Other chemical storage areas were not evaluated as a component of the facility inspection due to time constraints.			
Any floor drains?	Not reviewed (N/R).	Any spill control measures?	N/R.
General housekeeping of chemical storage area (Describe): The facility chemical storage areas were not evaluated as a component of the inspection.			
12. Are hazardous wastes drummed and labeled? N/R.			
13. Does the IU have hazardous waste manifests? N/R.			
Any problems associated with hazardous waste: N/R.			
14. Solid waste production: The facility produces solid waste in the form of recovered oils from the treatment system, garbage, and cardboard.			
Solid waste disposal method(s): Used oil waste, garbage, and cardboard are hauled offsite by a contractor for proper disposal.			
15. Description of sample location: The facility and the District conduct wastewater sampling at different locations at the facility. The facility representatives stated that internal facility lab personnel are responsible for the collection of the self-monitoring samples. Self-monitoring samples are collected from a sample port located after the CAF unit weir, prior to the effluent discharge pipe. The District's code enforcement inspector collects compliance samples for the District from a manhole located on south side of the facility. See notes 2 and 3 of the Notes section of this report for additional details.			
Sampling method/technique: The facility's permit requires grab samples to be collected.			
16. Evaluation of self-monitoring data?	Yes	<input checked="" type="checkbox"/> No	N/A
If yes, was self-monitoring adequate: N/R.			
17. Who performs the self-monitoring analysis? BSK Analytical Laboratories performs the self-monitoring analysis for the facility; however, self-monitoring samples are collected by Stratas personnel.			
<b>Notes:</b>			
1. The facility had recently installed new pH, EC, flow, and temperature meters at the CAF unit effluent discharge location. Facility representatives stated that wastewater effluent outside of the pH and EC limits can be diverted to the additional two 12,000-gallon reservoirs, and then be recycled through the CAF unit.			
2. The District was collecting compliance samples from the facility's discharge line downstream of where the facility's domestic wastewater was introduced. Therefore, the facility's domestic wastewater was diluting the facility's industrial wastewater flow that was being sampled by the District. Self-monitoring samples were being collected from a sample port located after the CAF unit weir, but prior to the effluent discharge pipe. However, 40 CFR 403.12(b)(ii) states that samples should be representative of daily operations. Furthermore, the federal regulations at 40 CFR 403.12(b)(iv) state that samples should be taken immediately downstream from pretreatment facilities. The District is required to ensure that			

compliance samples collected at the facility are representative of the facility's industrial wastewater discharge for daily operations.

3. Part 3 Item 2(a) of the facility permit states that "the permittee must monitor outfall 001" for all required parameters. The permit does not include a description of the sampling location for "outfall 001." The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include a sampling location. During the facility inspection, the EPA audit team was unable to determine if samples were being collected at the intended location due to the vagueness of the sampling description in the permit. The District is required to include a detailed description of the facility sample location in the permit so samples collected for both compliance and self-monitoring purposes are collected at the same location. This ensures consistency when collecting and analyzing samples.
4. At the time of the facility inspection, the facility was operating under an expired permit. The District was in the process of reissuing new permits to the industrial users at the time of the audit. The District provided copies of the new permits to the EPA audit team for each of the facilities visited during the audit. The new, unissued permit for the facility had an expiration date of 12/31/2014.