



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Acting Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Edmund G. Brown, Jr.
Governor

ORDER R2-2011-0009

AMENDMENT OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGERS WITH PRETREATMENT PROGRAM REQUIREMENTS

WHEREAS the California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter “Regional Water Board”), finds that:

1. The Regional Water Board issued waste discharge requirements that serve as National Pollutant Discharge Elimination System (NPDES) permits for the dischargers listed in Table 1 (hereinafter “Dischargers”). These permits authorize the Dischargers to discharge treated effluent from their respective publicly owned treatment works (POTWs) to waters of the United States under specific conditions.
2. POTWs collect wastewater from homes, commercial and industrial facilities, and transport it via the collection system to the treatment plant. Here, the POTW removes harmful organisms and other contaminants from the sewage so it can be discharged safely into waters of the United States. Generally, POTWs are designed to treat domestic sewage only. However, POTWs also receive wastewater from industrial (non-domestic) users. The pretreatment program aims at controlling pollutants from the industrial users which may pass through or interfere with POTW treatment processes or which may contaminate sewage sludge. In the San Francisco Bay region, there are 28 POTWs with pretreatment programs.
3. The USEPA formally delegated the Pretreatment Program to the State Water Resources Control Board and the Regional Water Boards on September 22, 1989. As of September 22, 1989, the Regional Water Board is the Approval Authority and is responsible for the review and approval of new and modified POTW Pretreatment Programs.
4. In August 2001, the Regional Water Board developed the pretreatment program provisions as an attachment to centralize all pretreatment program requirements within an individual NPDES permit. In June 2006, as part of our NPDES permit standardization efforts, the pretreatment program provisions became Attachment H. However, no substantial changes have been made to the pretreatment program provisions since August 2001.
5. This Order amends the orders listed in Table 1 to replace the pretreatment program provisions contained in Attachment H to those orders with the revised version of Attachment H attached to this Order (hereinafter “new Attachment H”).
6. The Regional Water Board revisions in the new Attachment H are both programmatic and non-programmatic as discussed below:

a. Programmatic revisions

- 1) Attachment H, Provision 1 authorizes the Regional Water Board's Executive Officer to grant a short extension of no greater than six months beyond an original six-month period for implementation of a new federal pretreatment regulatory rule that may come into effect during the term of the Discharger's permit. This short extension would be granted if the Discharger demonstrates that it needs additional time to process local adoption of sewer use ordinance modifications or other pretreatment program substantial modifications. For example, this revision was included because it can take more than six months for the Discharger to complete the sewer use ordinance modification adoption process.
- 2) Appendix H-4 allows the Discharger to request a reduction in monitoring frequency. The Regional Water Board would consider the Discharger's request as part of the NPDES permit reissuance. Appendix H-4 sets forth criteria for when the Discharger may make the request (e.g., when results have been non-detect for past eight years), and a minimum monitoring frequency based on the number of significant industrial users in the Discharger's service area. This revision was included because it would eliminate unnecessary costs of monitoring for constituents that are not present in the Discharger's waste stream.
- 3) Appendix H-3 requires the Discharger to submit only electronic files of its pretreatment annual and semiannual reports in lieu of a hard copy. This new requirement will reduce paper use and mailing costs, and help facilitate the Regional Water Board's paperless office efforts.

b. Non-programmatic revisions

- 1) Reduce redundancy in the pretreatment annual and semiannual reporting requirements, and
 - 2) Correct outdated references and grammatical errors, and revise formatting for clarity.
7. This Order is exempt from the provisions of the California Environmental Quality Act pursuant to California Water Code §13389.
 8. The Regional Water Board notified the Dischargers and interested agencies and persons of its intent to consider adoption of this Order, and provided an opportunity to submit written comments.
 9. In a public meeting, the Regional Water Board heard and considered all comments pertaining to this Order.

**TABLE 1
DISCHARGERS SUBJECT TO THIS ORDER**

Discharger	Permit Number	Order Number	Effective Date
American Canyon, City of	CA0038768	R2-2006-0036	7/1/06
Benicia, City of	CA0038091	R2-2008-0014	6/1/08
Burlingame, City of	CA0037788	R2-2008-0008	4/1/08
Central Contra Costa Sanitary District	CA0037648	R2-2007-0008	4/1/07
Central Marin Sanitary Agency	CA0038628	R2-2007-0007	4/1/07
Delta Diablo Sanitation District	CA0038547	R2-2009-0018	5/1/09
Dublin San Ramon Services District	CA0037613	R2-2006-0054	10/1/06
East Bay Municipal Utilities District, Special District No. 1	CA0037702	R2-2010-0060	5/1/10
Fairfield-Suisun Sewer District	CA0038024	R2-2009-0039	6/1/09
Hayward, City of	CA0037869	R2-2006-0053	10/1/06
Livermore, City of	CA0038008	R2-2006-0055	10/1/06
Millbrae, City of	CA0037532	R2-2008-0071	10/1/08
Napa Sanitation District	CA0037575	R2-2011-0007	4/1/11
Novato Sanitary District	CA0037958	R2-2010-0074	7/1/10
Oro Loma Sanitary District	CA0037869	R2-2006-0053	10/1/06
Palo Alto, City of	CA0037384	R2-2009-0032	6/1/09
Petaluma, City of	CA0037810	R2-2011-0003	3/1/11
Richmond, City of	CA0038539	R2-2008-0003	4/1/08
San Francisco, City and County of (Oceanside Plant)	CA0037681	R2-2009-0062	10/1/09
San Francisco, City and County of (Southeast Plant)	CA0037664	R2-2008-0007	4/1/08
San Jose and Santa Clara, Cities of	CA0037842	R2-2009-0038	6/1/09
San Leandro, City of	CA0037869	R2-2006-0053	10/1/06
San Mateo, City of	CA0037541	R2-2007-0075	2/1/08
South Bayside System Authority	CA0038369	R2-2007-0006	4/1/07
South San Francisco and San Bruno, Cities of	CA0038130	R2-2008-0094	1/1/09
Sunnyvale, City of	CA0037621	R2-2009-0061	10/1/09
Union Sanitary District	CA0037869	R2-2006-0053	10/1/06
Vallejo Sanitation and Flood Control District	CA0037699	R2-2006-0056	10/1/06
West County Wastewater District	CA0038539	R2-2008-0003	4/1/08

IT IS HEREBY ORDERED, pursuant to the provisions of California Water Code Division 7 and regulations adopted thereunder, and the provisions of the federal Clean Water Act and regulations and guidelines adopted thereunder, that the Dischargers listed in Table 1 shall comply with their respective orders listed in Table 1, as amended by this Order.

1. The provisions of the new Attachment H attached to this Order shall replace Attachment H for the orders listed in Table 1.
2. In the orders listed in Table 1, references to the new Attachment H shall replace all references to Attachment H.
3. This Order shall become effective on April 1, 2011.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on March 9, 2011.



Digitally signed
by Bruce Wolfe

Date:

2011.03.10

16:38:42 -08'00'

Bruce H. Wolfe
Executive Officer

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ATTACHMENT H
PRETREATMENT PROGRAM PROVISIONS

For

NPDES POTW WASTEWATER DISCHARGE PERMITS

March 2011
(Corrected May 2011)

TABLE OF CONTENTS	Page
I. Pretreatment Program Provisions.....	H-1
II. APPENDIX H-1.....	H-3
REQUIREMENTS FOR PRETREATMENT ANNUAL REPORTS	
1) Cover Sheet.....	H-3
2) Introduction.....	H-3
3) Definitions.....	H-4
4) Discussion of Upset, Interference and Pass Through.....	H-4
5) Influent, Effluent and Biosolids Monitoring Results.....	H-4
6) Inspection, Sampling and Enforcement Programs.....	H-5
7) Updated List of Regulated SIUs.....	H-5
8) SIU (categorical and non-categorical) Compliance Activities.....	H-6
9) Baseline Monitoring Report Update.....	H-8
10) Pretreatment Program Changes.....	H-8
11) Pretreatment Program Budget.....	H-8
12) Public Participation Summary.....	H-8
13) Biosolids Storage and Disposal Practice.....	H-9
14) Other Pollutant Reduction Activities.....	H-9
15) Other Subjects.....	H-9
16) Permit Compliance System (PCS) Data Entry Form.....	H-9
III. APPENDIX H-2.....	H-10
REQUIREMENTS FOR JANUARY-JUNE PRETREATMENT SEMIANNUAL REPORT	
1) Influent, Effluent and Biosolids Monitoring.....	H-10
2) Industrial User Compliance Status.....	H-10
3) Discharger’s Compliance with Pretreatment Program Requirements.....	H-11
IV. APPENDIX H-3.....	H-12
SIGNATURE REQUIREMENTS FOR PRETREATMENT ANNUAL AND SEMIANNUAL REPORTS	
V. APPENDIX H-4.....	H-13
REQUIREMENTS FOR INFLUENT, EFFLUENT AND BIOSOLIDS MONITORING	
1) Reduction of Monitoring Frequency.....	H-13
2) Influent and Effluent Monitoring.....	H-13
3) Biosolids Monitoring.....	H-14

Attachment H: Pretreatment Program Provisions

1. The Discharger shall be responsible and liable for the performance of all Control Authority pretreatment requirements contained in 40 CFR 403, including any regulatory revisions to Part 403. Where a Part 403 revision is promulgated after the effective date of the Discharger's permit and places mandatory actions upon the Discharger as Control Authority but does not specify a timetable for completion of the actions, the Discharger shall complete the required actions within six months from the issuance date of this permit or six months from the effective date of the Part 403 revisions, whichever comes later.

(If the Discharger cannot complete the required actions within the above six-month period due to the need to process local adoption of sewer use ordinance modifications or other substantial pretreatment program modifications, the Discharger shall notify the Executive Officer in writing at least 60 days prior to the six-month deadline. The written notification shall include a summary of completed required actions, an explanation for why the six-month deadline cannot be met, and a proposed timeframe to complete the rest of the required actions as soon as practical but not later than within twelve months of the issuance date of this permit or twelve months of the effective date of the Part 403 revisions, whichever comes later. The Executive Officer will notify the Discharger in writing within 30 days of receiving the request if the extension is not approved.)

The United States Environmental Protection Agency (USEPA), the State and/or other appropriate parties may initiate enforcement action against a nondomestic user for noncompliance with applicable standards and requirements as provided in the Clean Water Act (Act).

2. The Discharger shall enforce the requirements promulgated under Sections 307(b), 307(c), 307(d) and 402(b) of the Act with timely, appropriate and effective enforcement actions. The Discharger shall cause nondomestic users subject to Federal Categorical Standards to achieve compliance no later than the date specified in those requirements or, in the case of a new nondomestic user, upon commencement of the discharge.
3. The Discharger shall perform the pretreatment functions as required in 40 CFR 403 and amendments or modifications thereto including, but not limited to:
 - A) Implement the necessary legal authorities to fully implement the pretreatment regulations as provided in 40 CFR 403.8(f)(1);
 - B) Implement the programmatic functions as provided in 40 CFR 403.8(f)(2);
 - C) Publish an annual list of nondomestic users in significant noncompliance as provided per 40 CFR 403.8(f)(2)(viii);
 - D) Provide for the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR 403.8(f)(3); and
 - E) Enforce the national pretreatment standards for prohibited discharges and categorical standards as provided in 40 CFR 403.5 and 403.6, respectively.
4. The Discharger shall submit annually a report to USEPA Region 9, the State Water Board and the Regional Water Board describing its pretreatment program activities over the

previous calendar year. In the event that the Discharger is not in compliance with any conditions or requirements of the Pretreatment Program, the Discharger shall also include the reasons for noncompliance and a plan and schedule for achieving compliance. The report shall contain, but is not limited to, the information specified in Appendix H-1 entitled, "Requirements for Pretreatment Annual Reports." The annual report is due each year on February 28th.

5. The Discharger shall submit a pretreatment semiannual report to USEPA Region 9, the State Water Board and the Regional Water Board describing the status of its significant industrial users (SIUs). The report shall contain, but is not limited to, information specified in Appendix H-2 entitled, "Requirements for Pretreatment Semiannual Reports." The semiannual report is due July 31st for the period January through June. The information for the period July through December of each year shall be included in the Annual Report identified in Appendix H-1. The Executive Officer may exempt a Discharger from the semiannual reporting requirements on a case by case basis subject to State Water Board and USEPA's comment and approval.
6. The Discharger shall conduct the monitoring of its treatment plant's influent, effluent, and sludge (biosolids) as described in Appendix H-4 entitled, "Requirements for Influent, Effluent and Sludge (Biosolids) Monitoring." (The term "biosolids," as used in this Attachment, shall have the same meaning as wastewater treatment plant "sludge" and will be used from this point forward.) The Discharger shall evaluate the results of the sampling and analysis during the preparation of the semiannual and annual reports to identify any trends. Signing the certification statement used to transmit the reports shall be deemed to certify the Discharger has completed this data evaluation. A tabulation of the data shall be included in the pretreatment annual report as specified in Appendix H-4. The Executive Officer may require more or less frequent monitoring on a case by case basis.

APPENDIX H-1

REQUIREMENTS FOR PRETREATMENT ANNUAL REPORTS

The Pretreatment Annual Report is due each year on February 28 and shall contain activities conducted during the previous calendar year. The purpose of the Annual Report is to:

- Describe the status of the Discharger's pretreatment program; and
- Report on the effectiveness of the program, as determined by comparing the results of the preceding year's program implementation.

The report shall contain, at a minimum, the following information:

1) **Cover Sheet**

The cover sheet shall include:

- A) All the names and National Pollutant Discharge Elimination System (NPDES) permit numbers of all the Dischargers that are part of the Pretreatment Program;
- B) The name, address and telephone number of a pretreatment contact person;
- C) The period covered in the report;
- D) A statement of truthfulness; and
- E) The dated signature of a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the Publicly Owned Treatment Works (POTW) (40 CFR 403.12(m)).

2) **Introduction**

This section shall include:

- A) Any pertinent background information related to the Discharger and/or the nondomestic user base of the area;
- B) List of applicable interagency agreements used to implement the Discharger's pretreatment program (e.g., Memoranda of Understanding (MOU) with satellite sanitary sewer collection systems); and
- C) A status summary of the tasks required by a Pretreatment Compliance Inspection (PCI), Pretreatment Compliance Audit (PCA), Cleanup and Abatement Order (CAO), or other pretreatment-related enforcement actions required by the Regional Water Board or the USEPA. A more detailed discussion can be referenced and included in the section entitled, "Program Changes," if needed.

3) **Definitions**

This section shall include a list of key terms and their definitions that the Discharger uses to describe or characterize elements of its pretreatment program or the Discharger may provide a reference to its website if the applicable definitions are available on-line.

4) **Discussion of Upset, Interference and Pass Through**

This section shall include a discussion of Upset, Interference or Pass Through incidents, if any, at the Discharger's treatment plant(s) that the Discharger knows of or suspects were caused by nondomestic user discharges. Each incident shall be described, at a minimum, consisting of the following information:

- A) A description of what occurred;
- B) A description of what was done to identify the source;
- C) The name and address of the nondomestic user responsible;
- D) The reason(s) why the incident occurred;
- E) A description of the corrective actions taken; and
- F) An examination of the local and federal discharge limits and requirements for the purposes of determining whether any additional limits or changes to existing requirements may be necessary to prevent other Upset, Interference or Pass Through incidents.

5) **Influent, Effluent and Biosolids Monitoring Results**

The Discharger shall evaluate the influent, effluent and biosolids monitoring results as specified in Appendix H-4 in preparation of this report. The Discharger shall retain the analytical laboratory reports with the Quality Assurance and Quality Control (QA/QC) data validation and make these reports available upon request.

This section shall include:

- A) Description of the sampling procedures and an analysis of the results (see Appendix H-4 for specific requirements);
- B) Tabular summary of the compounds detected (compounds measured above the detection limit for the analytical method used) for the monitoring data generated during the reporting year as specified in Appendix H-4;
- C) Discussion of the investigation findings into any contributing sources of the compounds that exceed NPDES limits; and
- D) Graphical representation of the influent and effluent metal monitoring data for the past five years with a discussion of any trends.

6) **Inspection, Sampling and Enforcement Programs**

This section shall include at a minimum the following information:

- A) Inspections: Summary of the inspection program (e.g., criteria for determining the frequency of inspections and inspection procedures);
- B) Sampling Events: Summary of the sampling program (e.g., criteria for determining the frequency of sampling and chain of custody procedures); and
- C) Enforcement: Summary of Enforcement Response Plan (ERP) implementation including dates for adoption, last revision and submission to the Regional Water Board.

7) **Updated List of Regulated SIUs**

This section shall contain a list of all of the federal categories that apply to SIUs regulated by the Discharger. The specific categories shall be listed including the applicable 40 CFR subpart and section, and pretreatment standards (both maximum and average limits). Local limits developed by the Discharger shall be presented in a table including the applicability of the local limits to SIUs. If local limits do not apply uniformly to SIUs, specify the applicability in the tables listing the categorical industrial users (CIUs) and non-categorical SIUs. Tables developed in Sections 7A and 7B can be used to present or reference this information.

- A) CIUs - Include a table that alphabetically lists the CIUs regulated by the Discharger as of the end of the reporting period. This list shall include:
 - i. Name;
 - ii. Address;
 - iii. Applicable federal category(ies);
 - iv. Reference to the location where the applicable federal categorical standards are presented in the report;
 - v. Identify all deletions and additions keyed to the list submitted in the previous annual report. All deletions shall be briefly explained (e.g., closure, name change, ownership change, reclassification, declassification); and
 - vi. Information, calculations and data used to determine the limits for those CIUs for which a combined waste stream formula is applied.
- B) Non-categorical SIUs - Include a table that alphabetically lists the SIUs not subject to any federal categorical standards that were regulated by the Discharger as of the end of the reporting period. This list shall include:
 - i. Name;
 - ii. Address;
 - iii. A brief description of the type of business;

- iv. Identify all deletions and additions keyed to the list submitted in the previous annual report. All deletions shall be briefly explained (e.g., closure, name change, ownership change, reclassification, declassification); and
- v. Indicate the applicable discharge limits (e.g., different from local limits) to which the SIUs are subject and reference to the location where the applicable limits (e.g., local discharge limits) are presented in the report.

8) **SIU (categorical and non-categorical) Compliance Activities**

The information required in this section may be combined in the table developed in Section 7 above.

- A) **Inspection and Sampling Summary:** This section shall contain a summary of all the SIU inspections and sampling activities conducted by the Discharger and sampling activities conducted by the SIU over the reporting year to gather information and data regarding SIU compliance. The summary shall include:
 - i. The number of inspections and sampling events conducted for each SIU by the Discharger;
 - ii. The number of sampling events conducted by the SIU. Identify SIUs that are operating under an approved Total Toxic Organic (TTO) Management Plan;
 - iii. The quarters in which the above activities were conducted; and
 - iv. The compliance status of each SIU, delineated by quarter, and characterized using all applicable descriptions as given below:
 - a. Consistent compliance;
 - b. Inconsistent compliance;
 - c. Significant noncompliance;
 - d. On a compliance schedule to achieve compliance, (include the date final compliance is required);
 - e. Not in compliance and not on a compliance schedule; and
 - f. Compliance status unknown, and why not.
- B) **Enforcement Summary:** This section shall contain a summary of SIU compliance and enforcement activities during the reporting year. The summary may be included in the summary table developed in section 8A and shall include the names and addresses of all SIUs affected by the actions identified below. For each notice specified in enforcement action "i" through "iv," indicate whether it was for an infraction of a federal or local standard/limit or requirement.

- i. Warning letters or notices of violations regarding SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements;
 - ii. Administrative Orders regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements;
 - iii. Civil actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements;
 - iv. Criminal actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements;
 - v. Assessment of monetary penalties. Identify the amount of penalty in each case and reason for assessing the penalty;
 - vi. Order to restrict/suspend discharge to the Discharger; and
 - vii. Order to disconnect the discharge from entering the Discharger.
- C) **July-December Semiannual Data:** For SIU violations/noncompliance during the semiannual reporting period from July 1 through December 31, provide the following information:
- i. Name and facility address of the SIU;
 - ii. Indicate if the SIU is subject to Federal categorical standards; if so, specify the category including the subpart that applies;
 - iii. For SIUs subject to Federal Categorical Standards, indicate if the violation is of a categorical or local standard; and
 - iv. Indicate the compliance status of the SIU for the two quarters of the reporting period.
 - v. For violations/noncompliance identified in the reporting period, provide:
 - a. The date(s) of violation(s);
 - b. The parameters and corresponding concentrations exceeding the limits and the discharge limits for these parameters; and
 - c. A brief summary of the noncompliant event(s) and the steps that are being taken to achieve compliance.

9) **Baseline Monitoring Report Update**

This section shall provide a list of CIUs added to the pretreatment program since the last annual report. This list of new CIUs shall summarize the status of the respective Baseline Monitoring Reports (BMR). The BMR must contain the information specified in 40 CFR 403.12(b). For each new CIU, the summary shall indicate when the BMR was due; when the CIU was notified by the Discharger of this requirement; when the CIU submitted the report; and/or when the report is due.

10) **Pretreatment Program Changes**

This section shall contain a description of any significant changes in the Pretreatment Program during the past year including, but not limited to:

- A) Legal authority;
- B) Local limits;
- C) Monitoring/ inspection program and frequency;
- D) Enforcement protocol;
- E) Program's administrative structure;
- F) Staffing level;
- G) Resource requirements;
- H) Funding mechanism;
- I) If the manager of the Discharger's pretreatment program changed, a revised organizational chart shall be included; and
- J) If any element(s) of the program is in the process of being modified, this intention shall also be indicated.

11) **Pretreatment Program Budget**

This section shall present the budget spent on the Pretreatment Program. The budget, either by the calendar or fiscal year, shall show the total expenses required to implement the pretreatment program. A brief discussion of the source(s) of funding shall be provided. In addition, the Discharger shall make available upon request specific details on its pretreatment program expense amounts such as for personnel, equipment, and chemical analyses.

12) **Public Participation Summary**

This section shall include a copy of the public notice as required in 40 CFR 403.8(f)(2)(viii). If a notice was not published, the reason shall be stated.

13) **Biosolids Storage and Disposal Practice**

This section shall describe how treated biosolids are stored and ultimately disposed. If a biosolids storage area is used, it shall be described in detail including its location, containment features and biosolids handling procedures.

14) Other Pollutant Reduction Activities

This section shall include a brief description of any programs the Discharger implements to reduce pollutants from nondomestic users that are not classified as SIUs. If the Discharger submits any of this program information in an Annual Pollution Prevention Report, reference to this other report shall satisfy this reporting requirement.

15) Other Subjects

Other information related to the Pretreatment Program that does not fit into any of the above categories should be included in this section.

16) Permit Compliance System (PCS) Data Entry Form

The annual report shall include the PCS Data Entry Form. This form shall summarize the enforcement actions taken against SIUs in the past year. This form shall include the following information:

- A) Discharger's name,
- B) NPDES Permit number,
- C) Period covered by the report,
- D) Number of SIUs in significant noncompliance (SNC) that are on a pretreatment compliance schedule,
- E) Number of notices of violation and administrative orders issued against SIUs,
- F) Number of civil and criminal judicial actions against SIUs,
- G) Number of SIUs that have been published as a result of being in SNC, and
- H) Number of SIUs from which penalties have been collected.

APPENDIX H-2

REQUIREMENTS FOR JANUARY-JUNE PRETREATMENT SEMIANNUAL REPORT

The pretreatment semiannual report is due on July 31st for pretreatment program activities conducted from January through June unless an exception has been granted by the Regional Water Board's Executive Officer (e.g., pretreatment programs without any SIUs may qualify for an exception to the pretreatment semiannual report). Pretreatment activities conducted from July through December of each year shall be included in the Pretreatment Annual Report as specified in Appendix H-1. The pretreatment semiannual report shall contain, at a minimum the following information:

1) **Influent, Effluent and Biosolids Monitoring**

The influent, effluent and biosolids monitoring results shall be evaluated in preparation of this report. The Discharger shall retain analytical laboratory reports with the QA/QC data validation and make these reports available upon request. The Discharger shall also make available upon request a description of its influent, effluent and biosolids sampling procedures. Violations of any parameter that exceed NPDES limits shall be identified and reported. The contributing source(s) of the parameters that exceed NPDES limits shall be investigated and discussed.

2) **Significant Industrial User Compliance Status**

This section shall contain a list of all Significant Industrial Users (SIUs) that were not in consistent compliance with all pretreatment standards/limits or requirements for the reporting period. For the reported SIUs, the compliance status for the previous semiannual reporting period shall be included. Once the SIU has determined to be out of compliance, the SIU shall be included in subsequent reports until consistent compliance has been achieved. A brief description detailing the actions that the SIU undertook to come back into compliance shall be provided.

For each SIU on the list, the following information shall be provided:

- A) Name and facility address of the SIU
- B) Indicate if the SIU is subject to Federal categorical standards; if so, specify the category including the subpart that applies.
- C) For SIUs subject to Federal Categorical Standards, indicate if the violation is of a categorical or local standard.
- D) Indicate the compliance status of the SIU for the two quarters of the reporting period.
- E) For violations/noncompliance identified in the reporting period, provide:
 - i. The date(s) of violation(s);
 - ii. The parameters and corresponding concentrations exceeding the limits and the discharge limits for these parameters; and

- iii. A brief summary of the noncompliant event(s) and the steps that are being taken to achieve compliance.

3) **Discharger's Compliance with Pretreatment Program Requirements**

This section shall contain a discussion of the Discharger's compliance status with the Pretreatment Program Requirements as indicated in the latest Pretreatment Compliance Audit (PCA) Report or Pretreatment Compliance Inspection (PCI) Report. It shall contain a summary of the following information:

- A) Date of latest PCA or PCI report;
- B) Date of the Discharger's response;
- C) List of unresolved issues; and
- D) Plan(s) and schedule for resolving the remaining issues.

APPENDIX H-3

SIGNATURE REQUIREMENTS FOR PRETREATMENT ANNUAL AND SEMIANNUAL REPORTS

The pretreatment annual and semiannual reports shall be signed by a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for the overall operation of the Discharger [POTW - 40 CFR 403.12(m)]. Signed copies of the reports shall be submitted to the Regional Administrator at USEPA, the State Water Board, and the Regional Water Board at the following addresses unless the Discharger is instructed by any of these agencies to submit electronic copies of the required reports:

Pretreatment Program Reports
Clean Water Act Compliance Office (WTR-7)
Water Division
Pacific Southwest Region
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Submit electronic copies only to State and Regional Water Boards:

Pretreatment Program Manager
Regulatory Unit
State Water Resources Control Board
Division of Water Quality-15th Floor
1001 I Street
Sacramento, CA 95814
DMR@waterboards.ca.gov
NPDES_Wastewater@waterboards.ca.gov

Pretreatment Coordinator
NPDES Wastewater Division
SF Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

(Submit the report as a single Portable Document Format (PDF) file to the Pretreatment Coordinator's folder in the Regional Water Board's File Transfer Protocol (FTP) site. The instructions for using the FTP site can be found at the following internet address:
http://www.waterboards.ca.gov/sanfranciscobay/publications_forms/documents/FTP_Discharger_Guide-12-2010.pdf.)

APPENDIX H-4

REQUIREMENTS FOR INFLUENT, EFFLUENT AND BIOSOLIDS MONITORING

The Discharger shall conduct sampling of its treatment plant's influent, effluent and biosolids at the frequency shown in **the pretreatment requirements table** of the Monitoring and Reporting Program (MRP, Attachment E). When sampling periods coincide, one set of test results, reported separately, may be used for those parameters that are required to be monitored by both the influent and effluent monitoring requirements of the MRP and the Pretreatment Program. The Pretreatment Program monitoring reports as required in Appendices H-1 and H-2 shall be transmitted to the Pretreatment Program Coordinator.

1. Reduction of Monitoring Frequency

The minimum frequency of Pretreatment Program influent, effluent, and biosolids monitoring shall be dependant on the number of significant industrial users (SIUs) identified in the Discharger's Pretreatment Program as indicated in Table H-1.

Number of SIUs	Minimum Frequency
≤ 5	Once every five years
> 5 and < 50	Once every year
≥ 50	Twice per year

If the Discharger's required monitoring frequency is greater than the minimum specified in Table H-1, the Discharger may request reduced monitoring frequency for that constituent(s) as part of its application for permit reissuance if it meets the following criteria:

The monitoring data for the constituent(s) consistently show non-detect (ND) levels for the effluent monitoring and very low (i.e., near ND) levels for influent and biosolids monitoring for a minimum of eight previous years' worth of data.

The Discharger's request shall include tabular summaries of the data and a description of the trends in the industrial, commercial, and residential customers in the Discharger's service area that demonstrate control over the sources of the constituent(s). The Regional Water Board may grant a reduced monitoring frequency in the reissued permit after considering the information provided by the Discharger and any other relevant information.

2. Influent and Effluent Monitoring

The Discharger shall monitor for the parameters using the required sampling and test methods listed in **the pretreatment table** of the MRP. Any test method substitutions must have received prior written Executive Officer approval. Influent and Effluent sampling locations shall be the same as those sites specified in the MRP.

The influent and effluent samples should be taken at staggered times to account for treatment plant detention time. Appropriately staggered sampling is considered consistent with the requirement for collection of effluent samples coincident with influent

samples in Section III.A.3.a(2) of Attachment G. All samples must be representative of daily operations. Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto. For effluent monitoring, the reporting limits for the individual parameters shall be at or below the minimum levels (MLs) as stated in the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (2000) [also known as the State Implementation Policy (SIP)]; any revisions to the MLs shall be adhered to. If a parameter does not have a stated minimum level, then the Discharger shall conduct the analysis using the lowest commercially available and reasonably achievable detection levels.

The following report elements should be used to submit the influent and effluent monitoring results. A similarly structured format may be used but will be subject to Regional Water Board approval. The monitoring reports shall be submitted with the Pretreatment Annual Report identified in Appendix H-1.

- A) Sampling Procedures, Sample Dechlorination, Sample Compositing, and Data Validation (applicable quality assurance/quality control) shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto. The Discharger shall make available upon request its sampling procedures including methods of dechlorination, compositing, and data validation.
- B) A tabulation of the test results for the detected parameters shall be provided.
- C) Discussion of Results – The report shall include a complete discussion of the test results for the detected parameters. If any pollutants are detected in sufficient concentration to upset, interfere or pass through plant operations, the type of pollutant(s) and potential source(s) shall be noted, along with a plan of action to control, eliminate, and/or monitor the pollutant(s). Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

3. **Biosolids Monitoring**

Biosolids should be sampled in a manner that will be representative of the biosolids generated from the influent and effluent monitoring events except as noted in (C) below. The same parameters required for influent and effluent analysis shall be included in the biosolids analysis. The biosolids analyzed shall be a composite sample of the biosolids for final disposal consisting of:

- A) Biosolids lagoons – 20 grab samples collected at representative equidistant intervals (grid pattern) and composited as a single grab, or
- B) Dried stockpile – 20 grab samples collected at various representative locations and depths and composited as a single grab, or
- C) Dewatered biosolids- daily composite of 4 representative grab samples each day for 5 days taken at equal intervals during the daily operating shift taken from a) the dewatering units or b) from each truckload, and shall be combined into a single 5-day composite.

The USEPA manual, POTW Sludge Sampling and Analysis Guidance Document, August 1989, containing detailed sampling protocols specific to biosolids is recommended as a guidance for sampling procedures. The USEPA manual Analytical Methods of the National Sewage Sludge Survey, September 1990, containing detailed analytical protocols specific to biosolids, is recommended as a guidance for analytical methods.

In determining if the biosolids is a hazardous waste, the Discharger shall adhere to Article 2, "Criteria for Identifying the Characteristics of Hazardous Waste," and Article 3, "Characteristics of Hazardous Waste," of Title 22, California Code of Regulations, Sections 66261.10 to 66261.24 and all amendments thereto.

The following report elements should be used to submit the biosolids monitoring results. A similarly structured form may be used but will be subject to Regional Water Board approval. The results shall be submitted with the Pretreatment Annual Report identified in Appendix H-1.

- Sampling Procedures and Data Validation (applicable quality assurance/quality control) shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto. The Discharger shall make available upon request its biosolids sampling procedures and data validation methods.
- Test Results – Tabulate the test results for the detected parameters and include the percent solids.
- Discussion of Results –Include a complete discussion of test results for the detected parameters. If the detected pollutant(s) is reasonably deemed to have an adverse effect on biosolids disposal, a plan of action to control, eliminate, and/or monitor the pollutant(s) and the known or potential source(s) shall be included. Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

The Discharger shall also provide a summary table presenting any influent, effluent or biosolids monitoring data for non-priority pollutants that the Discharger believes may be causing or contributing to interference, pass through or adversely impacting biosolids quality.