



February 26, 2019

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

SUBJECT: 2018 Pretreatment Annual Report

Dear Mr. Chee:

Please find attached the City and County of San Francisco's (City's) 2018 Pretreatment Annual Report. The report covers the period January 1, 2018 – December 31, 2018 and is submitted pursuant to the requirements of the NPDES permits issued to the City by the San Francisco Bay Regional Water Quality Control Board, Orders R2-2011-0009, R2-2009-0062, and R2-2013-0029.

If you have any questions or require additional information about the contents of the report, please contact me at (415) 695-7358 or at [lcandelaria@sfgwater.org](mailto:lcandelaria@sfgwater.org).

Sincerely,

Linda Candelaria, Acting Pretreatment Manager  
Pretreatment Program  
Wastewater Enterprise / Collection System Division

Attachment

**London N. Breed**  
Mayor

**Ann Moller Caen**  
Vice President

**Francesca Vietor**  
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**Anson Moran**  
Commissioner

**Ike Kwon**  
Commissioner

**Harlan L. Kelly, Jr.**  
General Manager





*City and County of San Francisco*

**PRETREATMENT PROGRAM ANNUAL REPORT**

**2018**

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## Discharger Pretreatment Program Annual Report


NPDES Permit Holder: City and County of San Francisco  
 Period Covered by This Report: January 1, 2018 to December 31, 2018  
 Period Covered by Previous Report: January 1, 2017 to December 31, 2017

<u>Name of Wastewater Treatment Plant</u>	<u>NPDES Permit Number</u>
Oceanside Water Pollution Control Plant (OSP)	CA0037681
Southeast Water Pollution Control Plant (SEP)	CA0037664

Person to contact concerning information contained in this report:

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I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
 \_\_\_\_\_  
 Greg Norby  
 Assistant General Manager  
 San Francisco Public Utilities Commission  
 Wastewater Enterprise

2/25/2019  
 Date

**London N. Breed**  
 Mayor

**Ann Moller Caen**  
 Vice President

**Francesca Viotor**  
 Commissioner

**Anson Moran**  
 Commissioner

**Ike Kwon**  
 Commissioner

**Harlan L. Kelly, Jr.**  
 General Manager



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## **1. INTRODUCTION**

This is the annual report of the Pretreatment Program of the City and County of San Francisco (City) for the period January 1, 2018 through December 31, 2018. This report is prepared in response to the requirements of the National Pollutant Discharge Elimination System (NPDES) permits issued to the City by the San Francisco Bay Regional Water Quality Control Board (RWQCB or Board), Order Nos. R2-2011-0009, R2-2009-0062, and R2-2013-0029.

### **1.1 SFPUC Background**

The San Francisco Public Utilities Commission provides retail drinking water and wastewater services to the City, wholesale water to three Bay Area counties, and green hydroelectric and solar power to municipal departments. The SFPUC's Wastewater Enterprise (WWE) operates and maintains the City's combined sewer collection system and treatment plants. Within the WWE, the Collection System Division (CSD) manages the City's pretreatment program.

### **1.2 Wastewater Service Area and Facility Information**

All of the sanitary wastewater generated within the City is treated at one of two Publicly Owned Treatment Works (POTWs): the Southeast Water Pollution Control Plant (SE) and the Oceanside Water Pollution Control Plant (OSP).

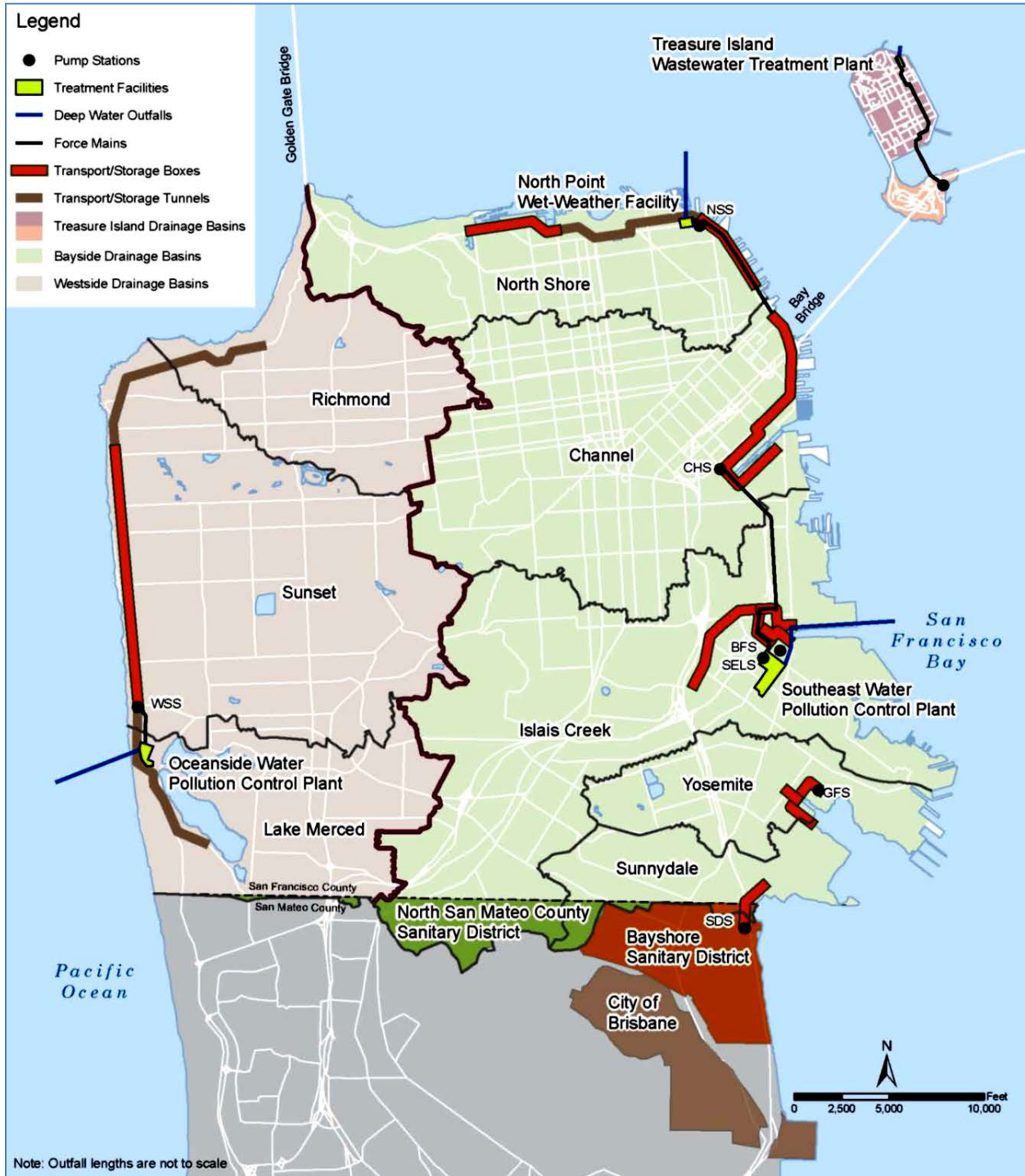
SEP treats all flows generated on the eastern portion of the City, approximately 80 percent of the City's wastewater, as well as a portion of flows generated by three adjacent municipal districts: the Bayshore Sanitary District (portions of Brisbane, and Daly City), the City of Brisbane (residential sector), and the North San Mateo County Sanitation District (portion of Daly City). SEP provides secondary treatment for a design capacity of 85.4 million gallons per day (MGD). Under peak wet weather conditions, SEP can provide secondary treatment to a total of 150 MGD and primary treatment to an additional 100 MGD. Average dry weather flow during 2018 was 52.6 MGD. Solids are processed via anaerobic digestion, and beneficially re-used as alternative daily cover at a permitted landfill site or land-applied at a permitted site.

The Oceanside Water Pollution Control Plant (OSP) treats all flows generated by the western portion of the City. OSP provides secondary treatment for a design capacity of 43 MGD. Under peak wet weather conditions, OSP can provide secondary treatment to a total of 43 MGD and primary treatment to an additional 22 MGD. Average dry weather flow during 2018 was 12.4 MGD. Solids are treated via anaerobic digestion and re-used as alternative daily cover at a permitted landfill or land-applied at a permitted site.

SEP and OSP service a population of approximately 880,000. The service areas are almost entirely residential and commercial and include only three regulated categorical industrial users (CIUs) and fourteen regulated non-categorical significant industrial users (SIUs). Eight of the fourteen SIUs are hospitals. All three CIUs are located within the SEP service area. Eleven of the fourteen SIUs are located within SEP service area, two are located in OSP service area, and one located in Brisbane. In 2017- 2018, pretreatment staff began reviewing large-scale microbreweries and began making site visits to these facilities.

The City's combined sewer system is depicted in Figure 1.

FIGURE 1 – San Francisco Combined Sewer System



#### **1.4 Interagency Agreements**

The City has interagency agreements with the following agencies to implement the pretreatment program in service areas that are tributary to SEP:

- North San Mateo Sanitation District,
- City of Brisbane Guadalupe Valley Sanitation Sewer District, and
- Bayshore Sanitation District.

#### **1.5 Pretreatment Compliance Inspection/Audit (PCI/PCA)**

On November 14-16, 2017, PG Environmental, a U.S. Environmental Protection Agency (USEPA) contractor, conducted a Pretreatment Compliance Audit (PCA) of the City's Pretreatment Program. On March 21, 2018, the City received from the San Francisco Bay Regional Water Quality Control Board, (SFRWQB), the 2017 Pretreatment Compliance Audit Report. The City responded to the audit report in a transmittal dated May 21, 2018 to the SFRWQCB.

The majority of the requirements in the findings require the Sewer Use Ordinance to be updated. The City and County of San Francisco (CCSF), is still in that process, which requires approval by the Commission, Board of Supervisors and the Mayor. Please see the semi-annual report, submitted on July 30, 2018, for more detailed information.

## 2. DEFINITIONS AND ABBREVIATIONS

### 2.1 Definitions

**Act:** The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251, *et seq.*

**Administrative Order:** An enforcement document that directs an industrial user to undertake or cease specific activities. This order will take different forms depending upon application, e.g., Administrative Civil Penalty Order, Cease and Desist Order, Cleanup and Abatement Order, Compliance Order, or Consent Order.

**Article 4.1:** City and County of San Francisco Municipal Code (Public Works Code) Article 4.1, "Industrial Waste," (Ordinance No. 116-97, adopted March 28, 1997). This is the Sewer Use Ordinance (SUO) as required by the Pretreatment Program.

**Baseline Monitoring Report:** A report required from industrial users that are subject to categorical pretreatment standards. The due dates and contents of this report are described in federal regulations at 40 CFR 403.12(b).

**Bioaccumulative Toxic Substance:** A toxic substance that concentrates in living organisms through direct assimilation or accumulation through the food chain, as defined in Title 22, California Code of Regulations and any amendments thereto.

**Biosolids:** Semisolid or solid residues of anaerobically digested sewage plant sludge. Biosolids contain material removed during the treatment of wastewater discharged from domestic and non-domestic sources. Raw sludge is collected from both the primary and secondary clarifiers, stabilized by anaerobic digestion, and then dewatered by either centrifugation or belt press, before disposal as centrifuge cake or filter cake respectively. Synonyms include the terms "anaerobically digested sewage sludge", and "sludge cake" (as dewatered, digested sewage sludge).

**Categorical Pretreatment Standard:** Any regulation containing pollutant discharge limits promulgated by EPA in accordance with sections 307(b) and (c) of the Act (33 U.S.C. section 1317) that apply to a specific category of Industrial Users and that appear in 40 CFR Chapter I, Subchapter N, Parts 405–471.

**Categorical Industrial User (CIU):** An Industrial User subject to a Categorical Pretreatment Standard or Categorical Standard.

**Compliance Status:** Determined by reviewing an industrial user's sampling results and other information such as compliance with pretreatment standards, reporting requirements, and compliance schedules. Compliance is evaluated over a period of one quarter and reported as "consistent compliance", "inconsistent compliance", "significant noncompliance", "compliance status unknown", and "on a (compliance) time schedule".

**Composite Sample:** A sample formed by mixing discrete grab samples taken at periodic points in time (time-proportioned samples) or a continuous proportion of the flow (flow-proportioned samples). The mixing of discrete (grab) samples into a composite sample averages the variations in discrete sample composition. Composite samples reflect the average wastewater characteristics during the sampling period that is usually specified for a 24-hour period. (See also definition of grab sample below.)

**Consistent Compliance:** The status determined for an industrial user that had no violations during the current reporting quarter, and also had no compliance issues during the previous reporting quarter.

**Control Authority:** The San Francisco Public Utilities Commission (SFPUC).

**Discharge:** The direct or indirect introduction of wastewater and waterborne contaminants into the sewerage system from any non-domestic source.

**Discharger:** The owner of record, lessee, sub-lessee, mortgagee in possession, or any person, whether located within or outside City boundaries, that either discharges or threatens to discharge pollutants into the sewerage system, or is responsible for the process that directly or indirectly introduces pollutants into the sewerage system..

**Environmental Protection Agency or EPA:** The U.S. Environmental Protection Agency or, where appropriate, the Regional Water Management Division Director, the Regional Administrator, or other duly authorized official of said agency.

**Enforcement Response Plan:** A guidance document that explains the normal enforcement of the Pretreatment Program of the Public Utilities Commission against noncompliant industrial users as enforced by the Collection System Division.

**General Manager:** The General Manager of the San Francisco Public Utilities Commission, or a designated representative of the General Manager.

**Grab Sample:** A sample that is collected from a waste stream without regard to the flow in the waste stream, and over a period of time not to exceed fifteen (15) minutes.

**Inconsistent Compliance:** The status determined for an industrial user that is in noncompliance during the reporting quarter, but was not in significant noncompliance.

**Industrial User (used interchangeably with Discharger):** A source of indirect discharge.

**Interference:** A discharge that, alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the City's sewerage system, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of a violation of the City's NPDES permit(s) or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory/regulatory provisions or permits issued thereunder, or any more stringent State or local regulations: Section 405 of the Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; and the Marine Protection, Research, and Sanctuaries Act.

**Local Limits:** Specific discharge limits developed and enforced by the City upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR 403.5(a)(1) and (b).

**New Source:** Any building, structure, facility, or installation from which there is (or may be) a discharge of pollutants, the construction of which commenced after the publication of proposed Pretreatment Standards under Section 307(c) of the Act that will be applicable to such source if such Standards are thereafter promulgated in accordance with that section, provided that:

- (1) The building, structure, facility, or installation is constructed at a site at which no other source is located; or
- (2) The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an Existing Source; or
- (3) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an Existing Source at the same site.

**Non-Categorical Industrial User:** An industrial user not subject to EPA categorical pretreatment standards.

**NPDES (National Pollutant Discharge Elimination System) Permit:** A regulatory document issued to the City by the United States Environmental Protection Agency or the State of California pursuant to Section 402 of the Act. The permit is designed to control the City's discharges from the sewerage system into Receiving Waters.

**Pass-Through:** A discharge which exits the sewerage system into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the City's NPDES permit(s), including an increase in the magnitude or duration of a violation.

**Permit:** Authorization issued to a discharger by the General Manager pursuant to Sections 124 and 125 of Article 4.1 of the San Francisco Public Works Code allowing the discharge of wastewater into the City's sewerage system in accordance with all applicable laws and regulations.

**Pollutant:** Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, municipal, agricultural and industrial wastes, and certain characteristics of wastewater (e.g., pH, temperature, TSS, turbidity, color, BOD, COD, toxicity, or odor).

**Pretreatment:** The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of, introducing such pollutants into the sewerage system. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable Pretreatment Standard.

**Publicly Owned Treatment Works or POTW:** (Used interchangeably with Sewerage System)

**Receiving Waters:** The waters contiguous to the City, including, but not limited to, Central Basin, China Basin, India Basin, Islais Creek Channel, the Pacific Ocean, the Golden Gate, San Francisco Bay, and South Basin.

**Sewerage System:** A treatment works, as defined by Section 212 of the Act (33 U.S.C. section 1292), which is owned by the City. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of storm water, sewage or industrial wastes of a liquid nature, and any conveyances, which convey wastewater to a treatment plant. The sewerage system includes facilities owned and operated by public entities other than the City, where such facilities direct wastewater into the sewerage system and are subject to the jurisdiction of the City as defined by law, contract, or inter-jurisdictional agreement.

**Significant Industrial User (SIU):** A Significant Industrial User is:

- (1) An Industrial User subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; or
- (2) An Industrial User that:
  - (i) Discharges an average of twenty five thousand (25,000) gpd or more of process wastewater to the sewerage system (excluding sanitary, noncontact cooling and boiler blowdown wastewater); or
  - (ii) Contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the City’s treatment plant; or
  - (iii) Is designated as such by the City on the basis that it has a reasonable potential for adversely affecting the sewerage system’s operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

**Significant Noncompliance:** The status determined for an industrial user that meets one or more of the following criteria:

- (A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter taken during a six-month period, exceed (by any magnitude) a numeric pretreatment standard or requirement, including instantaneous limits as defined in Section 123(e)(1) of this Ordinance;
- (B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six-month period, equals or exceeds the product of the numeric pretreatment standard or requirement, including instantaneous limits, multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH);
- (C) Any other violation of a pretreatment standard or requirement (daily maximum, long term average, instantaneous limit, or narrative standard) that the General Manager determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of City personnel or the general public;
- (D) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the exercise of the General Manager’s emergency authority to halt or prevent such a discharge;
- (E) Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in an individual wastewater discharge permit, or a general permit, or enforcement order for starting construction, completing construction, or attaining final compliance;
- (F) Failure to provide within forty-five (45) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- (G) Failure to accurately report noncompliance; or
- (H) Any other violation(s), which may include a violation of Best Management Practices, which the General Manager determines will adversely affect the operation or implementation of the local pretreatment program.

**Upset:** The term means an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond the reasonable control of the industrial user. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation..

**Wastewater:** Liquid- and water-carried industrial wastes and sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the sewerage system.

## **2.2 Abbreviations**

BMP – Best Management Practice

BMR – Baseline Monitoring Report

CFR – Code of Federal Regulations

CIU – Categorical Industrial User

CSD – Combined Sewer Discharge

CSS – Combined Sewer System

DPW – Department of Public Works

EPA – U.S. Environmental Protection Agency

FOG – Fats, Oils and Grease

gpd – gallons per day

IU – Industrial User

LIMS – Laboratory Information Management System

MGD – million gallons per day

mg/L – milligrams per liter

NOV – Notice of Violation

NPDES – National Pollutant Discharge Elimination System

OSP – Oceanside Water Pollution Control Plant

PIMS – Pretreatment Information Management System

POTW – Publicly Owned Treatment Works

RWQCB – Regional Water Quality Control Board for the San Francisco Bay Region (Board)

SEP – Southeast Water Pollution Control Plant

SFPUC – San Francisco Public Utilities Commission

SIU – Significant Industrial User

SNC – Significant Noncompliance

SUO – Sewer Use Ordinance (Article 4.1)

TRC – Technical Review Criteria

WWE/CSD – Wastewater Enterprise/Collection System Division

### 3 UPSET, INTERFERENCE AND PASS THROUGH

No incidents of interference or pass through that relate to a pretreatment incursion occurred at either POTW.

### 4 INFLUENT, EFFLUENT AND BIOSOLIDS MONITORING RESULTS

This section provides an evaluation of the analytical results from the monitoring of SEP and OSP influent, effluent and biosolids, as specified in Appendix H-1 of Attachment H—Pretreatment Requirements.

#### 4.1 Influent and Effluent Monitoring

##### 4.1.1 Sampling Locations

OSP Influent – The influent is monitored within the Oceanside Water Pollution Control Plant, at a point in the facility headworks at which all waste tributary to the system is present and preceding any phase of treatment, and exclusive of any return flows or process side streams that would significantly impact the quantity or quality of the influent.

OSP Effluent – The final effluent monitoring point is within the Oceanside Water Pollution Control Plant, at a point in the sewerage system following all phases of treatment and prior to contact with the receiving water or any effluent from the Westside Wet Weather Facilities.

SEP Influent – The influent is monitored within the Southeast Water Pollution Control Plant, at a point in facilities upstream of the primary sedimentation basins at which all waste tributary to the treatment system is present, and preceding any phase of treatment.

SEP Effluent – The final effluent monitoring point is within the Southeast Water Pollution Control Plant, at a point in the sewerage system, between the point at which all wastes have gone through complete secondary treatment, including disinfection and the point of discharge to deep water.

##### 4.1.2 Collection Times

Flow-proportioned composite samples are appropriate for most pollutant analyses, but when grab sampling is mandated by regulation for certain pollutants or pollutant parameters, those samples are collected per outlined in Attachment H, *Requirements for Influent, Effluent and Biosolids, B*. The influent and effluent samples are taken at staggered times to account for treatment plant detention time.

##### 4.1.3 Collection Method

At each sampling point and designated time, the following is used to collect and fill:

- 3 each 40 mL septum vials (HCl pH < 2) for EPA 624 (Volatile Organic Compounds);
- 1 each 1,000-mL amber glass bottle for EPA 625 (Semi-volatile Organic Compounds); and
- 1 each 1,000-mL amber glass bottle for EPA 608 (Organochlorine Pesticides, and PCB's).

At each sampling point and designated times, a HPDE carboy is used to collect sufficient samples to provide one each 500-mL plastic bottle for toxic metal analysis.

The samples are stored under ice in an ice chest for transportation back to the WWE/CSD field monitoring section (FMS). Composite samples are composited proportional to the flow values obtained

at the collection time and submitted the next business day to the analytical laboratory for analysis; if analyses are performed at the SFPUC Water Quality Laboratory, the SFPUC Water Quality laboratory requests the samples are not preserved and will be preserved in the laboratory with high-grade acid. Analyses may be performed by the SFPUC Water Quality Laboratory, or by a private, State-certified contract laboratory. Flow values are obtained from the OSP and SEP Operations Division. Values are then correlated to collection times. Table 4.1 summarizes the sample collection.

**TABLE 4.1 – Summary of Influent & Effluent Sample Collection**

Pollutant	Container	Container Liner	Volume	Preservation
Toxic Metals	Plastic bottle		500-mL	HNO <sub>3</sub> to pH < 2, 4°C
Volatile Organics (VOC)	Glass vial	Teflon™-lined septum	40 mL	HCl to pH < 2, 4°C
Semivolatile Organics (Base, Neutrals and Acids)	Amber or clear glass wide-mouth jar	Teflon™-lined cap	1 liter	4°C only
Organochlorine pesticides and PCBs	Amber or clear glass wide-mouth jar	Teflon™-lined cap	1 liter	4°C only
Cyanide, Total	Plastic bottle		2 liters	NaOH

Monthly cyanide sampling for cyanide at the influent and effluent at SEP is performed by the Water Quality laboratory staff. Influent and Effluent cyanide is sampled monthly at OSP by the Field Monitoring sampling staff.

#### 4.1.4 Method of Sample Dechlorination

Excess powdered ascorbic acid is added to all EPA 624 vials to neutralize any residual chlorine when present in either the influent or effluent samples.

#### 4.1.5 Analytical Methodology

The EPA methods used for analysis of influent and effluent are summarized in Table 4.2.

**TABLE 4.2 – Analytical Methods – Influent and Effluent Sample**

Pollutant Parameter	EPA Method
Arsenic	200.8
Cadmium	200.8
Chromium	200.8
Copper	200.8
Lead	200.8
Mercury	245.1/1631
Nickel	200.8
Selenium	3114B
Silver	200.8
Zinc	200.8

Pollutant Parameter	EPA Method
Cyanide, total	SM 4500-CN
Volatile Organic Compounds (VOC)	624
Semi-volatile Organics (Base, Neutrals and Acids)	625
Organochlorine pesticides and PCBs	608

#### 4.1.6 Monitoring Dates

Priority pollutant monitoring of the OSP and SEP influent and effluent was performed on the following dates, under dry weather conditions:

**TABLE 4.3 – Priority Pollutant Monitoring Dates – Influent and Effluent Samples**

SEP		OSP	
INFLUENT	EFFLUENT	INFLUENT	EFFLUENT
March 6, 2018	March 6, 2018	March 6, 2018	March 6, 2018
June 26, 2018	June 26, 2018	June 26, 2018	June 26, 2018
December 11, 2018	December 11, 2018	Not sampled	August 15, 2018
		December 11, 2018	December 11, 2018

Pollutant monitoring for volatile organic compounds (VOC) and base/neutrals and acids extractable organic compounds (Semivolatile Organics or BNA) are required quarterly at OSP and semi-annually at SEP. Third quarter influent sampling at OSP was missed.

#### 4.1.7 Tabular Summary of Pollutants Detected

See Tables 4.4 for a monitoring summary of the metals and cyanide data followed by the graphical representations of the influent and effluent metal monitoring data for the past five years. See Tables 4.5 for a summary of the VOC and BNA pollutants detected in the influent and effluent samples collected at the two treatment plants. Analytical laboratory reports, with the Quality Assurance and Quality Control (QA/QC) data validation from the above monitoring, are available upon request.

**TABLE 4.4-1 Monitoring Results for Pollutants – OSP Influent and Effluent, Metals and Cyanide**

Month	Influent		Effluent	
	As (ug/L)			
January	DNQ	1.09	DNQ	0.821
February	DNQ	1.03	DNQ	1.23
March	DNQ	0.52	DNQ	0.84
April	DNQ	1.3	DNQ	0.89
May	DNQ	0.998	DNQ	0.821
June	DNQ	1.15	DNQ	0.781
July	DNQ	1.24	DNQ	0.797
August	DNQ	1.02	DNQ	0.792
September	DNQ	1.07	DNQ	0.696
October	DNQ	1.21	DNQ	0.772
November	DNQ	0.851	DNQ	0.573
December	DNQ	0.961	DNQ	0.775

Month	Influent		Effluent	
	Cd (ug/L)			
January		0.263	DNQ	0.0453
February	DNQ	0.143	DNQ	0.0479
March		0.536	DNQ	0.0716
April		0.344	<	0.04
May	DNQ	0.167	<	0.04
June	DNQ	0.19	<	0.04
July	DNQ	0.241	<	0.04
August	DNQ	0.14	DNQ	0.0338
September		0.258	DNQ	0.045
October	DNQ	0.185	DNQ	0.0182
November	DNQ	0.158	DNQ	0.161
December		0.384		0.446

Month	Influent		Effluent	
	Cr (ug/L)			
January		1.52		0.698
February		1.12		0.698
March		1.86		0.698
April		3.7		0.975
May		1.33		1.02
June		1.86		0.749
July		2.02		0.723
August		1.15		0.687
September		1.46		0.548
October		2.86		0.599
November		1.07		2.5
December		1.88		1.37

Month	Influent		Effluent	
	Cu (ug/L)			
January		60		13.7
February		48.1		17.7
March		79.4		15.2
April		99.7		13.8
May		46.1		13.7
June		74.4		11.6
July		77		13.9
August		51.3		11
September		61.2		14
October		52.5		10.8
November		50.1		9.74
December		55.8		12.4

Month	Influent		Effluent	
	Pb (ug/L)			
January		3.48		0.53
February		1.78		0.766
March		5.2		1.06
April		9.81		0.586
May		3.1		0.514
June		5.3	DNQ	0.456
July		5.72		0.678
August		3.8	DNQ	0.473
September		4.95		0.688
October		6.25		0.751
November		2.51	DNQ	0.271
December		3.09		0.605

Month	Influent		Effluent	
	Ni (ug/L)			
January		3.1		2.52
February		2.41		2.98
March		3.8		2.45
April		5.14		2.75
May		2.81		2.33
June		3.27		2.09
July		3.98		2.3
August		3.04		2.31
September		3.08		2.35
October		5.22		3.57
November		2.81		3.18
December		2.84		2.46

**OSP Influent and Effluent, Metals and Cyanide**

Pretreatment Program Annual Report – January 1, 2018 to December 31, 2018

Month	Influent		Effluent	
	Ag (ug/L)			
January		0.351	DNQ	0.0401
February	DNQ	0.19	DNQ	0.0899
March		0.458	DNQ	0.102
April		0.989	DNQ	0.112
May		0.314	DNQ	0.0837
June		0.343	DNQ	0.0601
July		0.409	DNQ	0.0446
August	DNQ	0.211	DNQ	0.0321
September		0.367	DNQ	0.0457
October		0.318	DNQ	0.0371
November	DNQ	0.217	DNQ	0.0336
December		0.502	DNQ	0.0662

Month	Influent		Effluent	
	Zn (ug/L)			
January		121		18
February		93.9		23.4
March		213		29.6
April		274		18
May		105		19.8
June		156		23.3
July		186		24.2
August		110		20.9
September		147		22.1
October		138		27
November		107		15.4
December		126		20.2

Month	Influent		Effluent	
	Se (ug/L)			
January	DNQ	0.541	DNQ	0.206
February	DNQ	0.502	DNQ	0.365
March	DNQ	0.582	DNQ	0.27
April	DNQ	0.951	DNQ	0.282
May	DNQ	0.451	DNQ	0.203
June	DNQ	0.598	DNQ	0.216
July	DNQ	0.799	DNQ	0.225
August	DNQ	0.403	DNQ	0.212
September	DNQ	0.411	DNQ	0.224
October	DNQ	0.435	DNQ	0.168
November	DNQ	0.501	DNQ	0.175
December	DNQ	0.46	DNQ	0.235

Month	Influent		Effluent	
	Hg (ug/L)			
January	DNQ	0.083		0.00669
February	DNQ	0.147		0.00877
March	DNQ	0.135		0.00616
April		0.213		0.0065
May	<	0.05		0.00457
June	DNQ	0.174		0.00409
July	DNQ	0.077		0.00459
August	DNQ	0.064		0.0116
September	DNQ	0.074		0.00722
October	DNQ	0.07		0.00726
November	<	0.05		0.004
December	<	0.05		0.00669

Month	Influent		Effluent	
	CN (ug/L)			
January				
February	<	4	DNQ	0.784
March	<	4	<	4
April	<	4	DNQ	2.2
May	<	4		
June	<	4	<	4
July	<	4	DNQ	1.52
August	<	4	DNQ	0.809
September	<	4	<	4
October	<	4	DNQ	1.51
November	<	4	<	4
December	<	3	<	3

2018 Report note for OSP metals tables:

- The missing data for the cyanide in January and May, (effluent only), are not being reported due to missed sampling events.

**TABLE 4.4-2 Monitoring Results for Pollutants – SEP Influent and Effluent, Metals and Cyanide**

Month	Influent		Effluent		Month	Influent		Effluent	
	As (ug/L)					Cd (ug/L)			
January	DNQ	1.4	DNQ	0.992	January	0.429	DNQ	0.0531	
February	DNQ	1.63	DNQ	0.971	February	DNQ	0.243	<	0.04
March	DNQ	1.63	DNQ	1.05	March	0.659	<	0.04	
April	DNQ	1.63	DNQ	0.929	April	DNQ	0.269	<	0.04
May	DNQ	1.66	DNQ	0.989	May	0.29	DNQ	0.0774	
June	DNQ	1.56	DNQ	0.938	June	0.31	DNQ	0.0615	
July	DNQ	1.52	DNQ	1.18	July	0.238	<	0.2	
August	DNQ	1.38	DNQ	0.914	August	DNQ	0.191	DNQ	0.0262
September	DNQ	1.54	DNQ	0.862	September	0.277	DNQ	0.0559	
October	DNQ	1.92	DNQ	1.06	October	0.313	DNQ	0.0161	
November	DNQ	1.36	DNQ	0.895	November	DNQ	0.179	DNQ	0.0232
December		2.13	DNQ	0.962	December	0.402	DNQ	0.0115	

Month	Influent		Effluent		Month	Influent		Effluent	
	Cr (ug/L)					Cu (ug/L)			
January		2.77	DNQ	0.495	January	42.7		4.99	
February		5.2		0.569	February	74.8		7.1	
March		6.28		0.762	March	63.9		5.98	
April		6.95	DNQ	0.479	April	89.7		4.84	
May		5.78		0.809	May	74.4		5.87	
June		4.7		0.608	June	75.4		5.99	
July		5.35	DNQ	1.72	July	78.7		9.05	
August		3.69		0.686	August	65.5		5.84	
September		6.65		0.578	September	99.5		5.84	
October		9.4		0.723	October	98.5		5.1	
November		4.16		0.612	November	62		3.72	
December		9.82		0.502	December	99.6		3.46	

Month	Influent		Effluent		Month	Influent		Effluent	
	Pb (ug/L)					Ni (ug/L)			
January		6.15		0.591	January	4.28		3.7	
February		12.5	DNQ	0.487	February	7.15		3.01	
March		28.8		0.795	March	7.74		3.34	
April		11.1	DNQ	0.359	April	7.22		2.9	
May		8.25		0.546	May	7.34		3.15	
June		12.2		0.54	June	6.11		3.05	
July		13.2	DNQ	0.87	July	6.17	DNQ	3.57	
August		7.73	DNQ	0.445	August	5.27		3.18	
September		14.2	DNQ	0.461	September	6.6		2.96	
October		21.3		0.736	October	11.4		3.87	
November		8.49	DNQ	0.326	November	5.94		3.13	
December		20.8	DNQ	0.352	December	11		2.82	

**SEP Influent and Effluent, Metals and Cyanide**

Month	Influent		Effluent	
	Ag (ug/L)			
January		0.331	DNQ	0.0311
February		0.54	DNQ	0.0475
March		0.308	DNQ	0.0214
April		0.788	DNQ	0.0203
May		0.332	DNQ	0.0214
June		0.469	DNQ	0.0251
July		0.39	DNQ	0.0355
August		0.367	DNQ	0.0248
September		0.662	DNQ	0.0327
October		0.582	DNQ	0.012
November		0.634	DNQ	0.0156
December		0.671	DNQ	0.0152

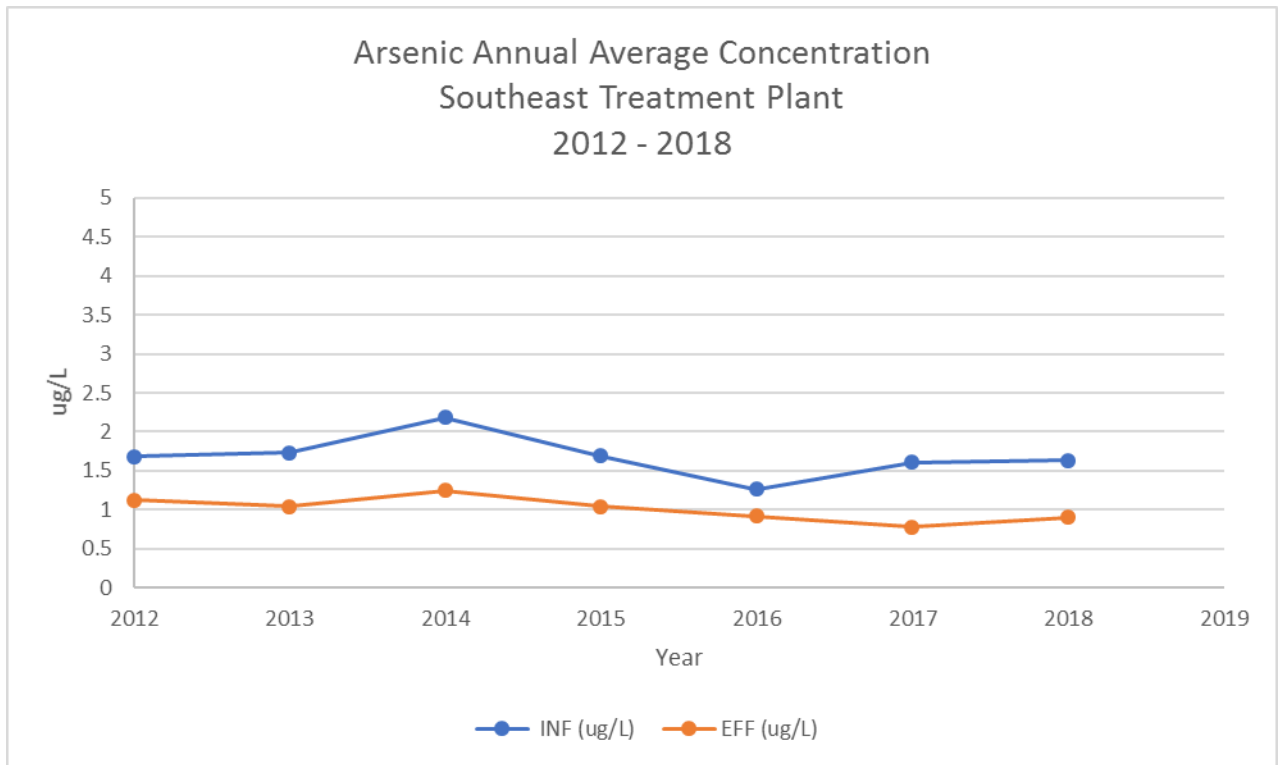
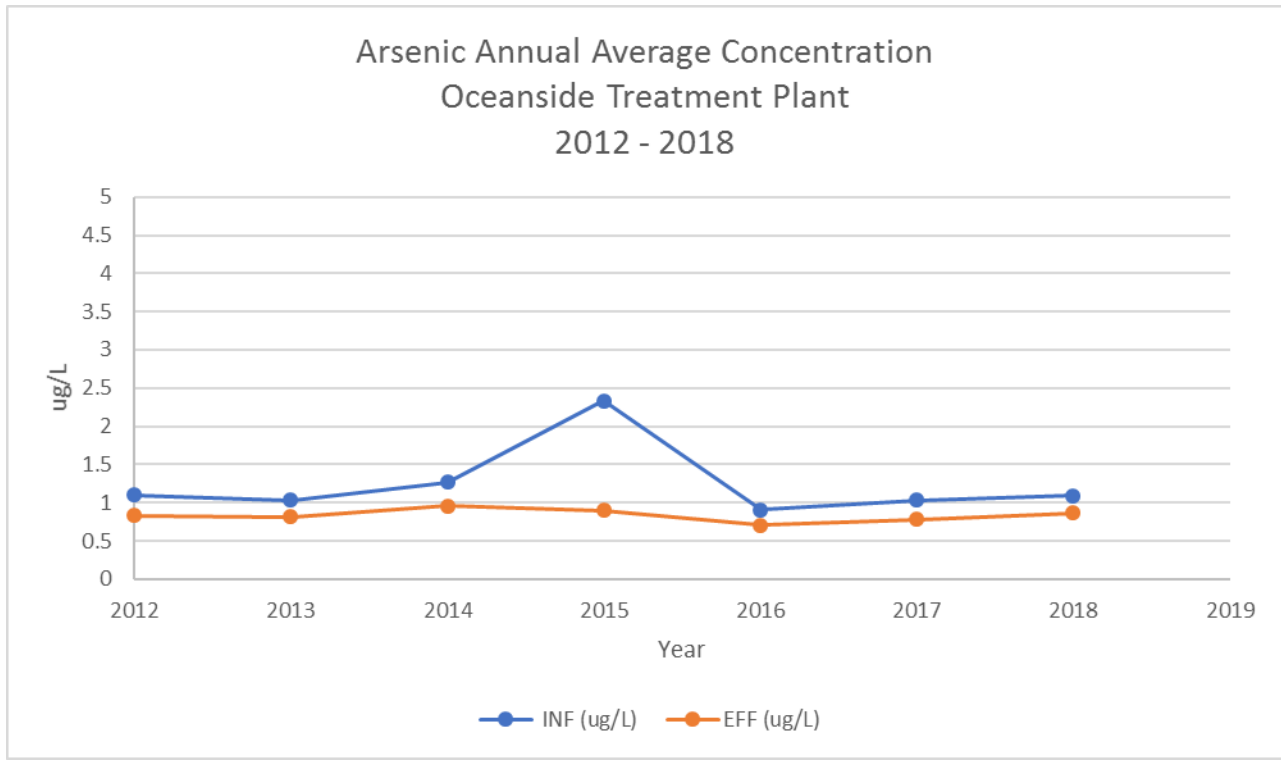
Month	Influent		Effluent	
	Zn (ug/L)			
January		84.5		21.9
February		175		25
March		236		33.5
April		160		23.2
May		136		24.9
June		158		23.9
July		155		25.3
August		179		17.5
September		192		28
October		214		24.5
November		120		22.1
December		254		27.4

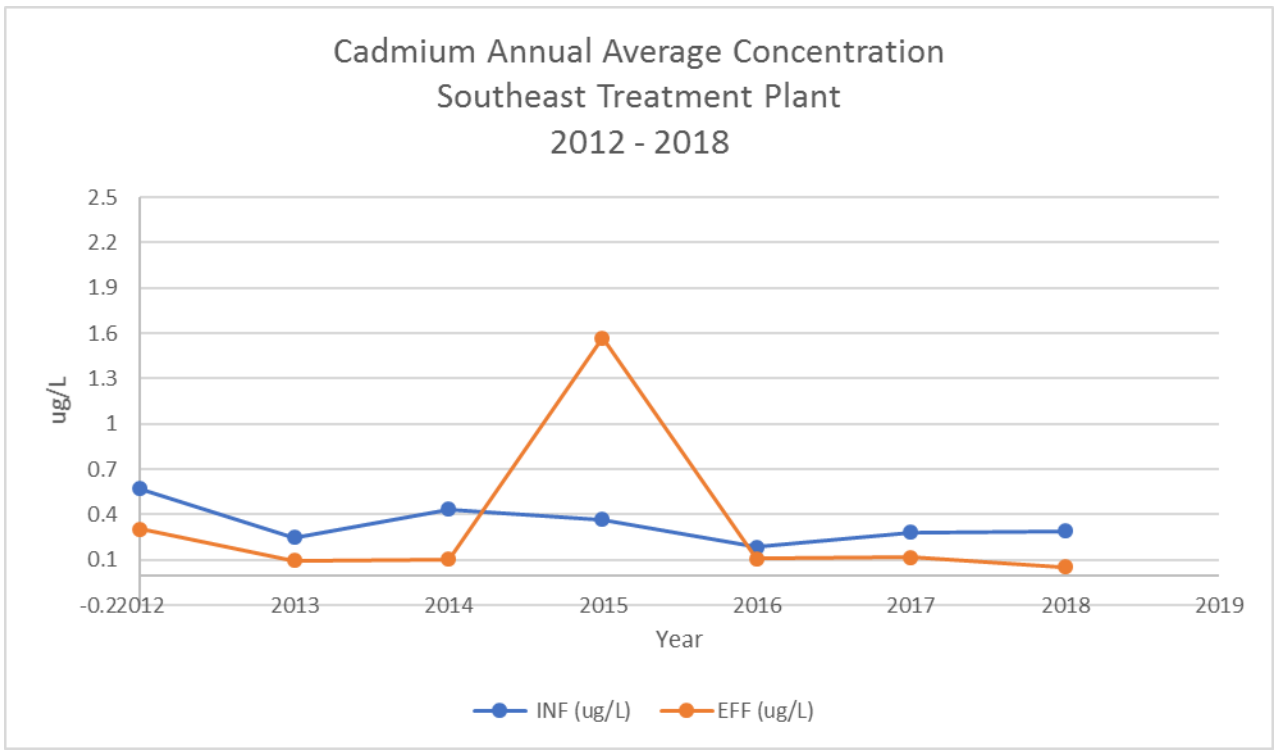
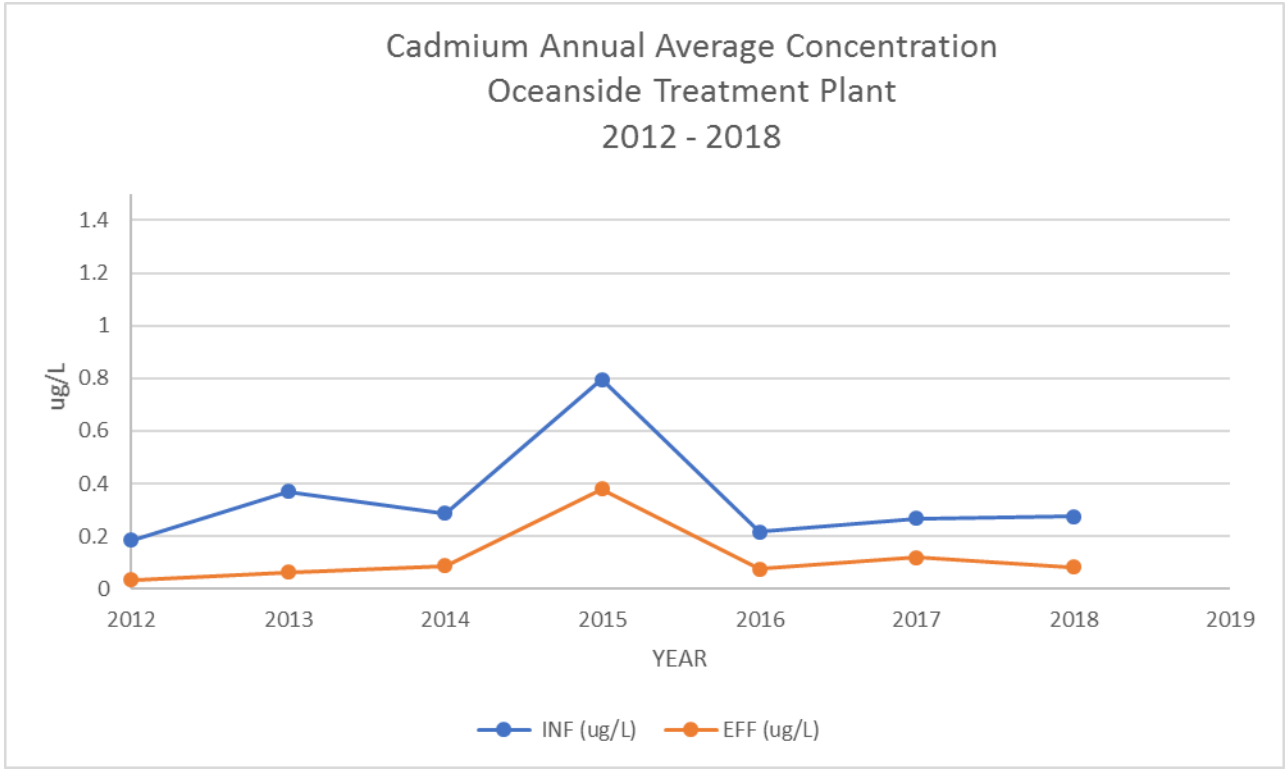
Month	Influent		Effluent	
	Se (ug/L)			
January		0.427	DNQ	0.217
February		0.68	DNQ	0.236
March		0.494	DNQ	0.244
April		0.674	DNQ	0.2
May		4.6	DNQ	0.218
June		0.845	DNQ	0.311
July	DNQ	0.538	DNQ	0.371
August		0.491	DNQ	0.193
September		0.555	DNQ	0.191
October		0.7	DNQ	0.305
November		0.519	DNQ	0.206
December		0.633	DNQ	0.162

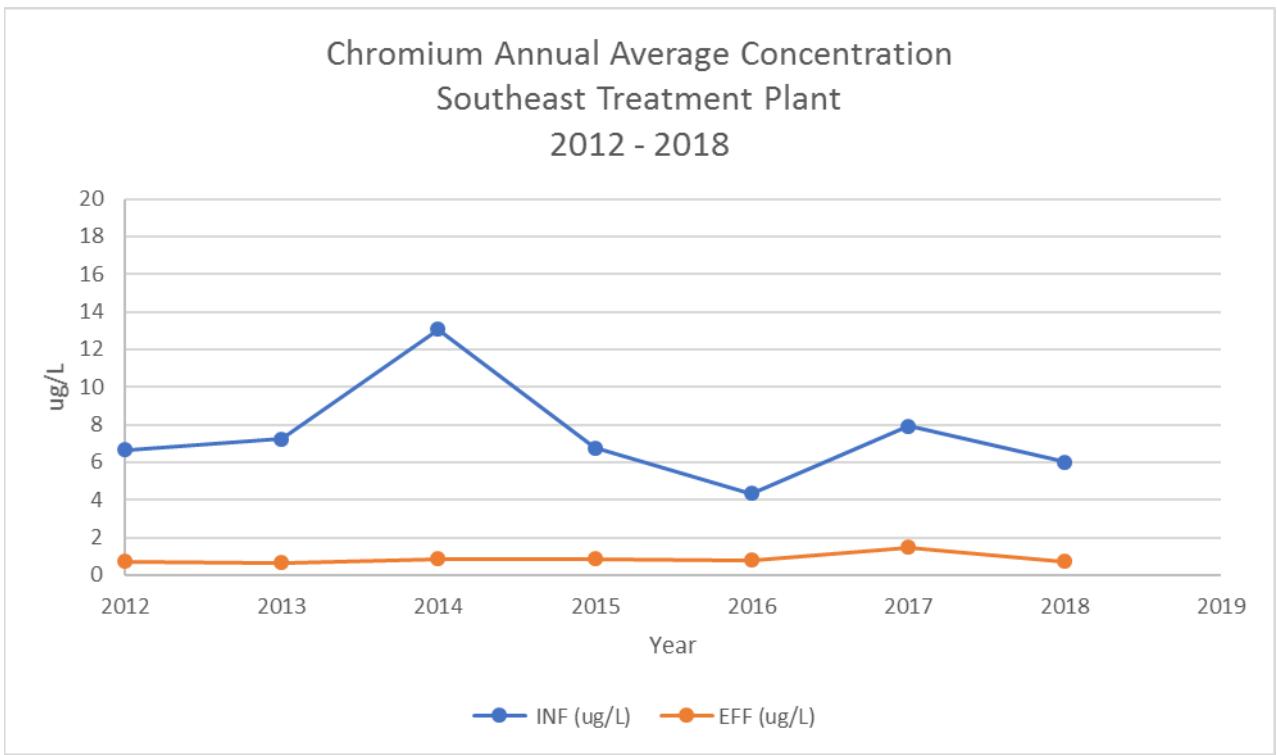
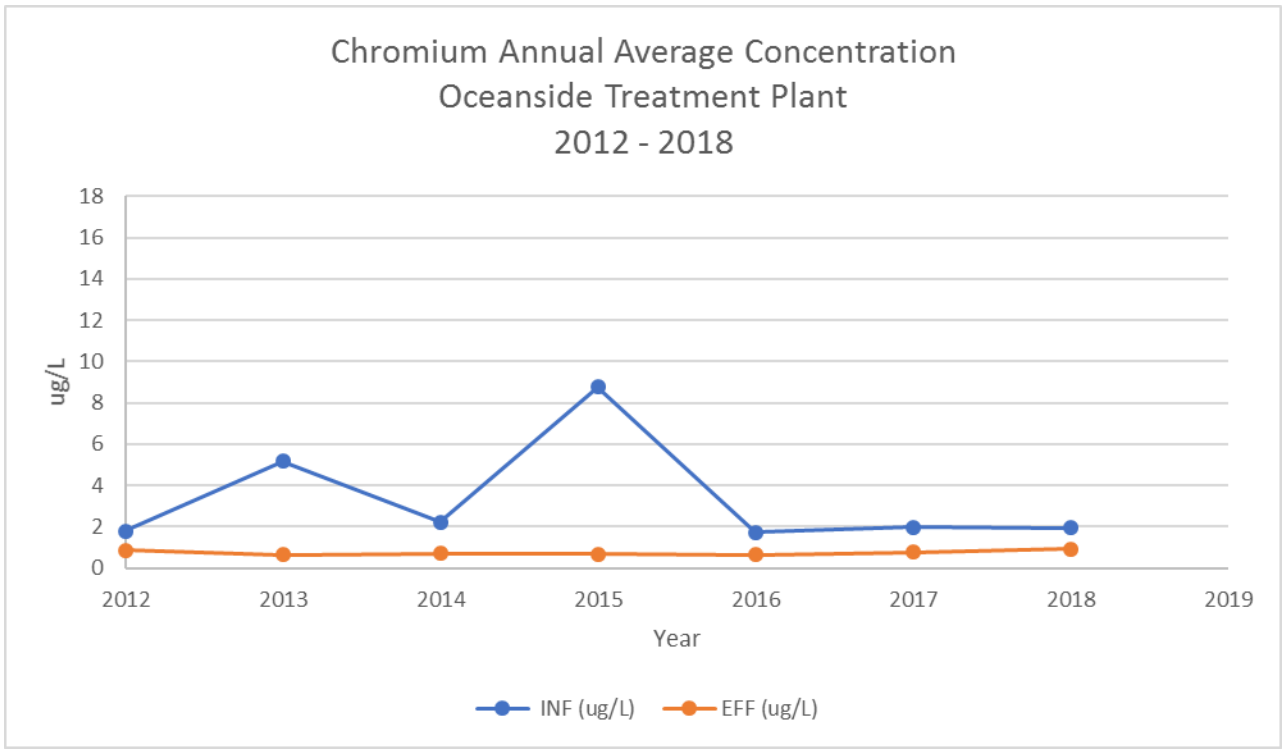
Month	Influent		Effluent	
	Hg (ug/L)			
January	<	0.05		0.00282
February	<	0.05	<	0.0004
March	DNQ	0.157		0.00295
April		0.321		0.00272
May	DNQ	0.063		0.0027
June	<	0.05		0.00249
July	DNQ	0.057		0.00314
August		0.224		0.0174
September	<	0.05		0.00526
October	DNQ	0.06		0.191
November	DNQ	0.101		0.00332
December	DNQ	0.097		0.00314

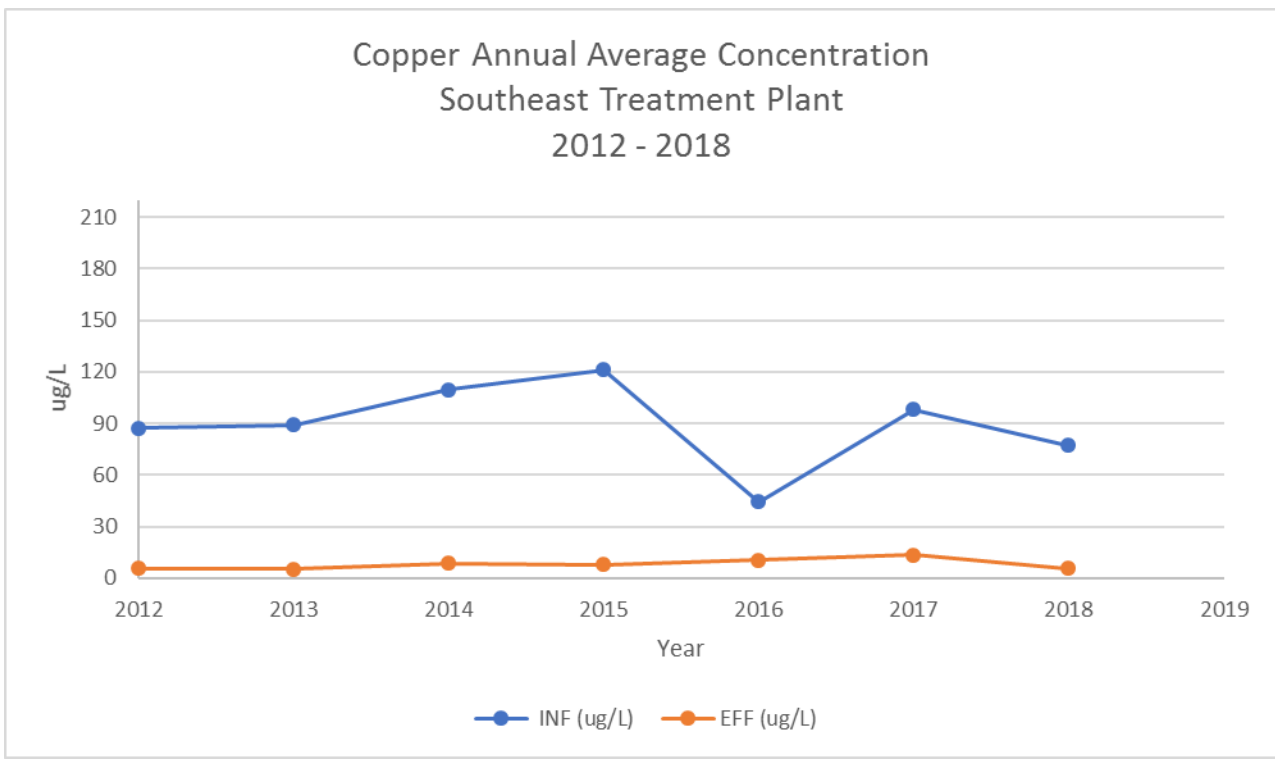
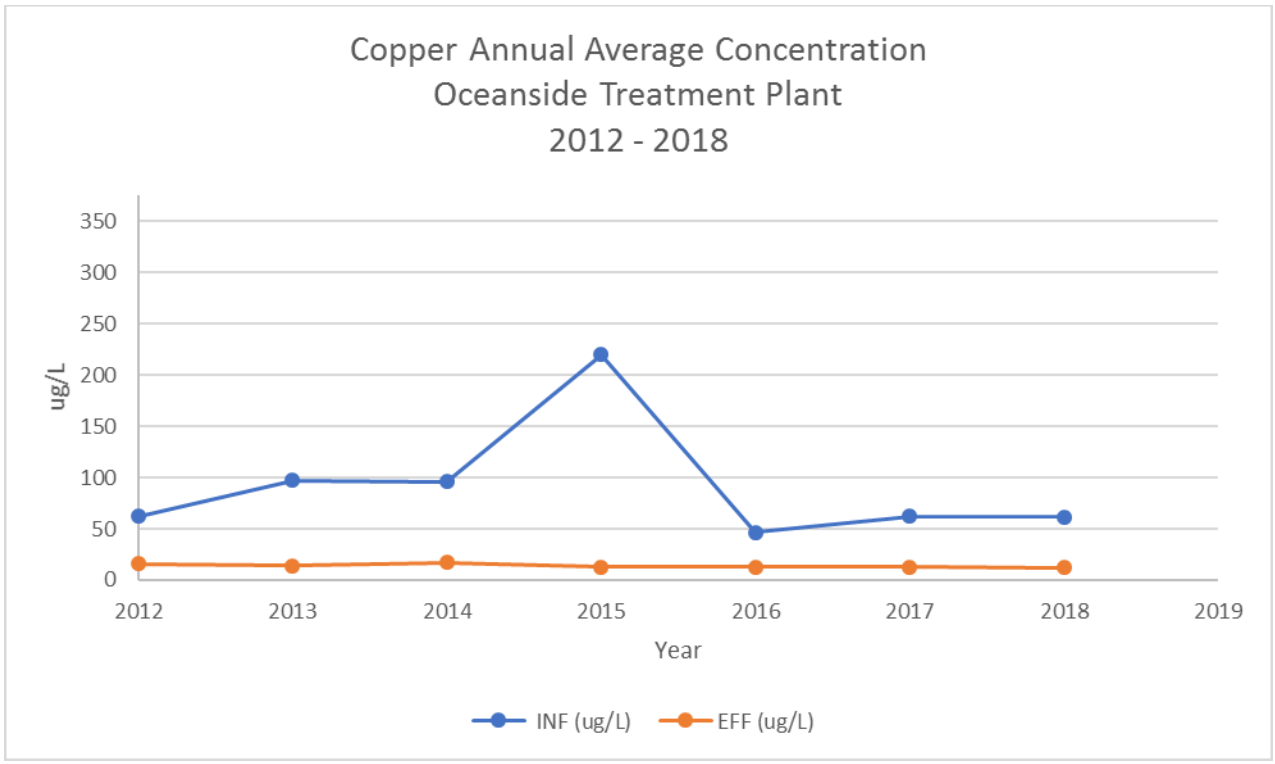
Month	Influent		Effluent	
	CN (ug/L)			
January	<	4	DNQ	0.764
February	<	4	DNQ	0.606
March	<	4	DNQ	0.636
April	<	4	DNQ	0.687
May	DNQ	4.88	DNQ	1.19
June	<	4	<	0.4
July	<	4	DNQ	1.48
August	<	4	DNQ	1.18
September	<	4	DNQ	0.79
October	<	4	DNQ	1.4
November	<	4	DNQ	0.405
December	DNQ	0.68	DNQ	0.68

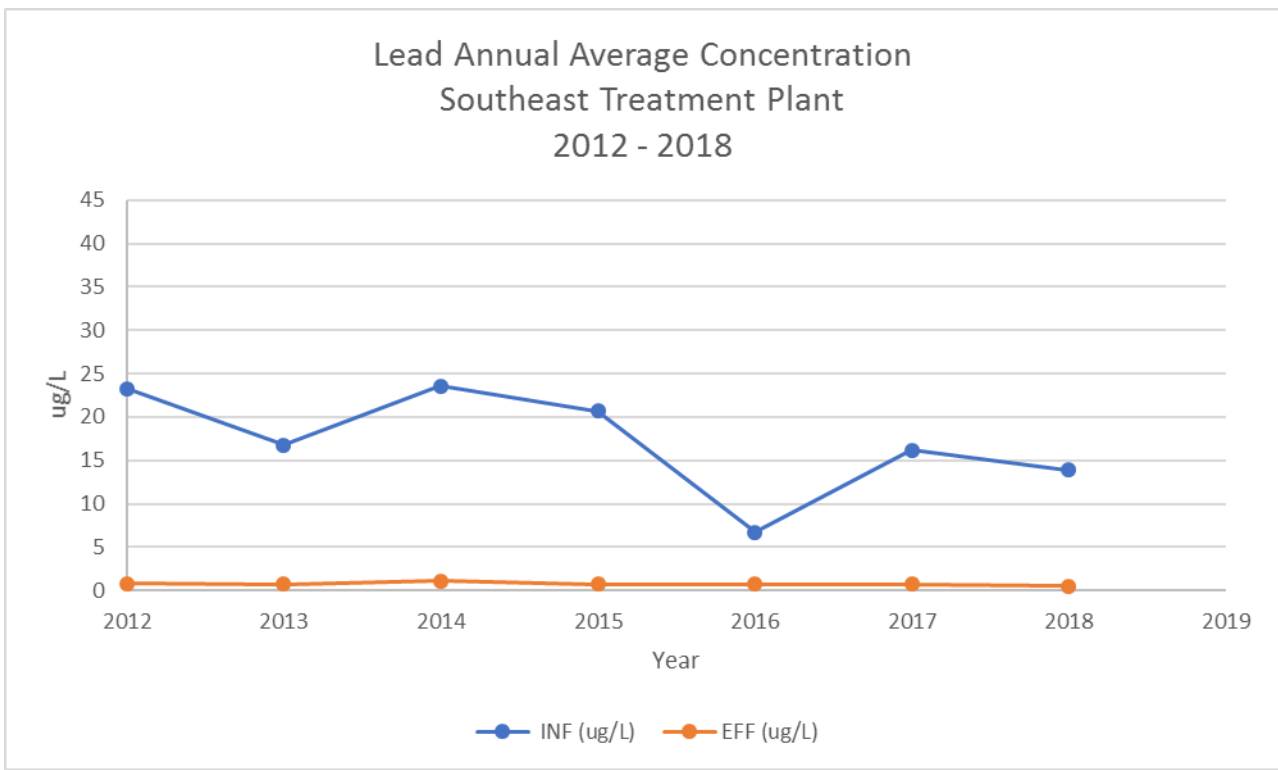
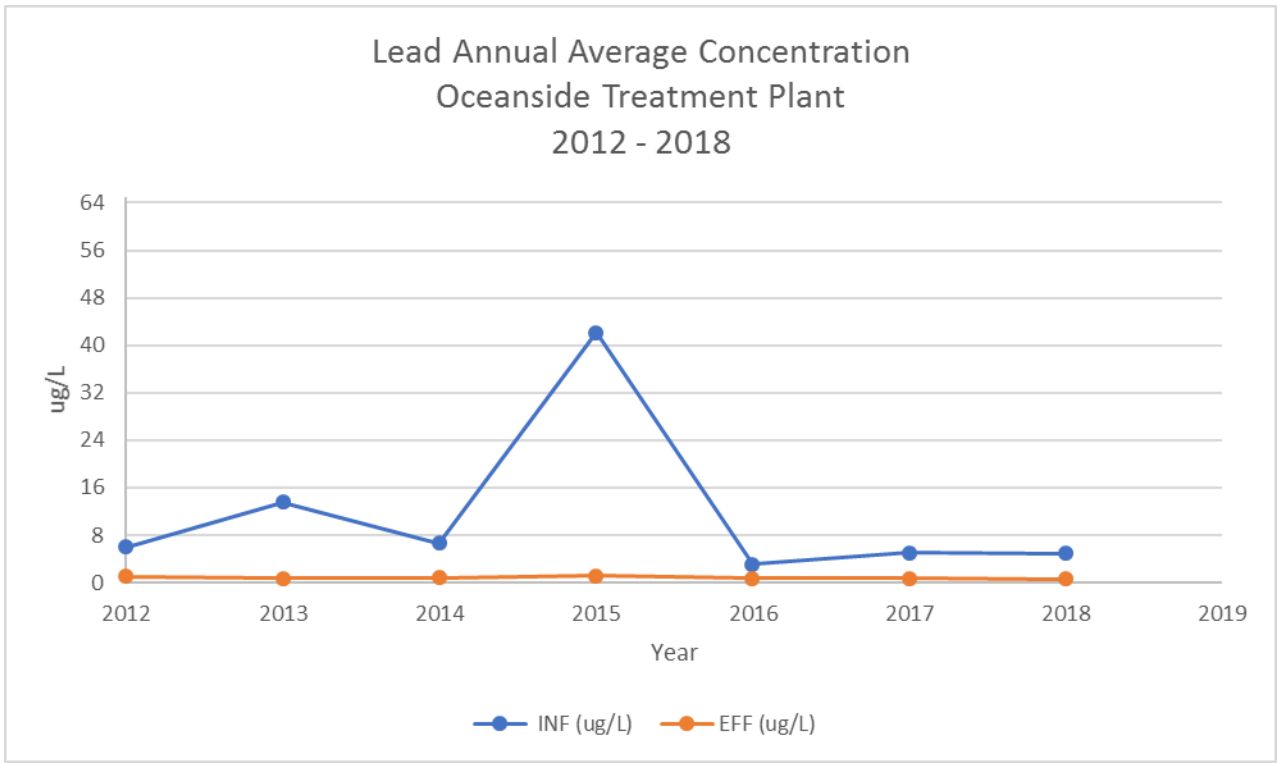
**TABLE 4.4-3**  
**5-Year Graphical Representation of the OSP and SEP Influent and Effluent Metals Monitoring**

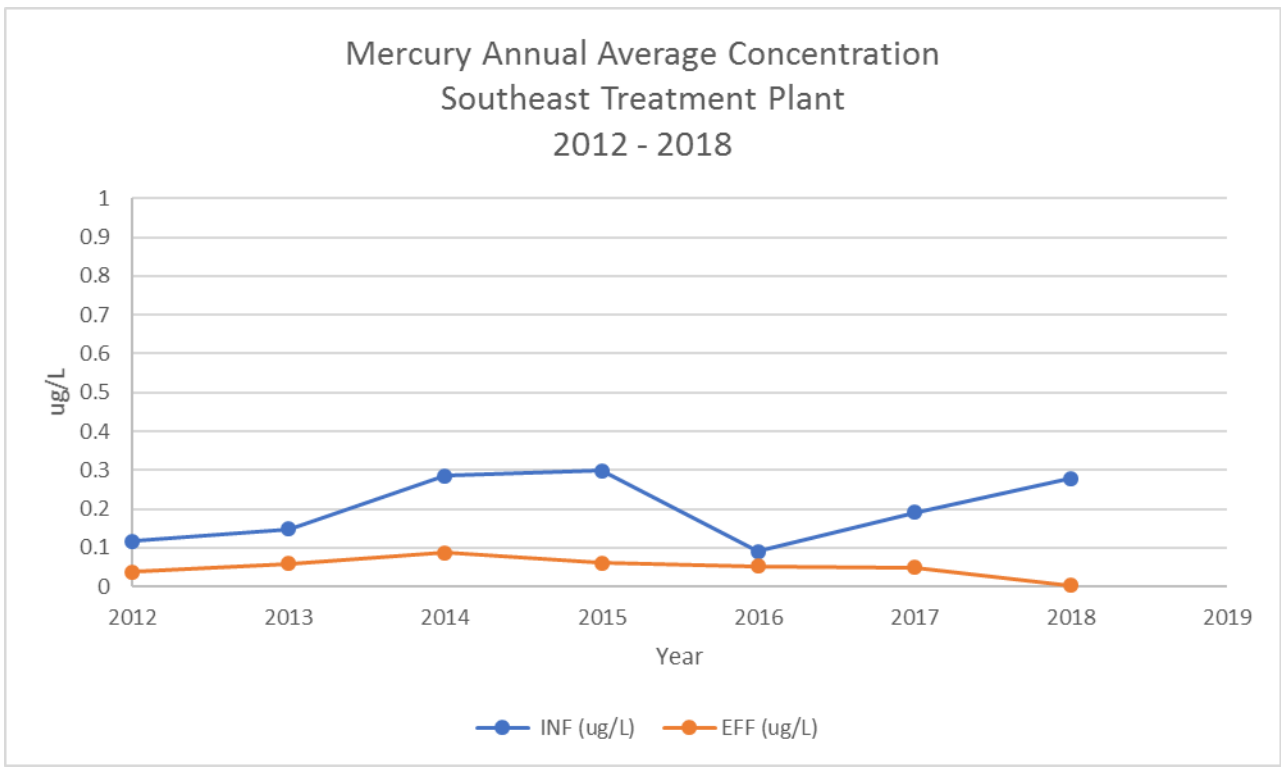
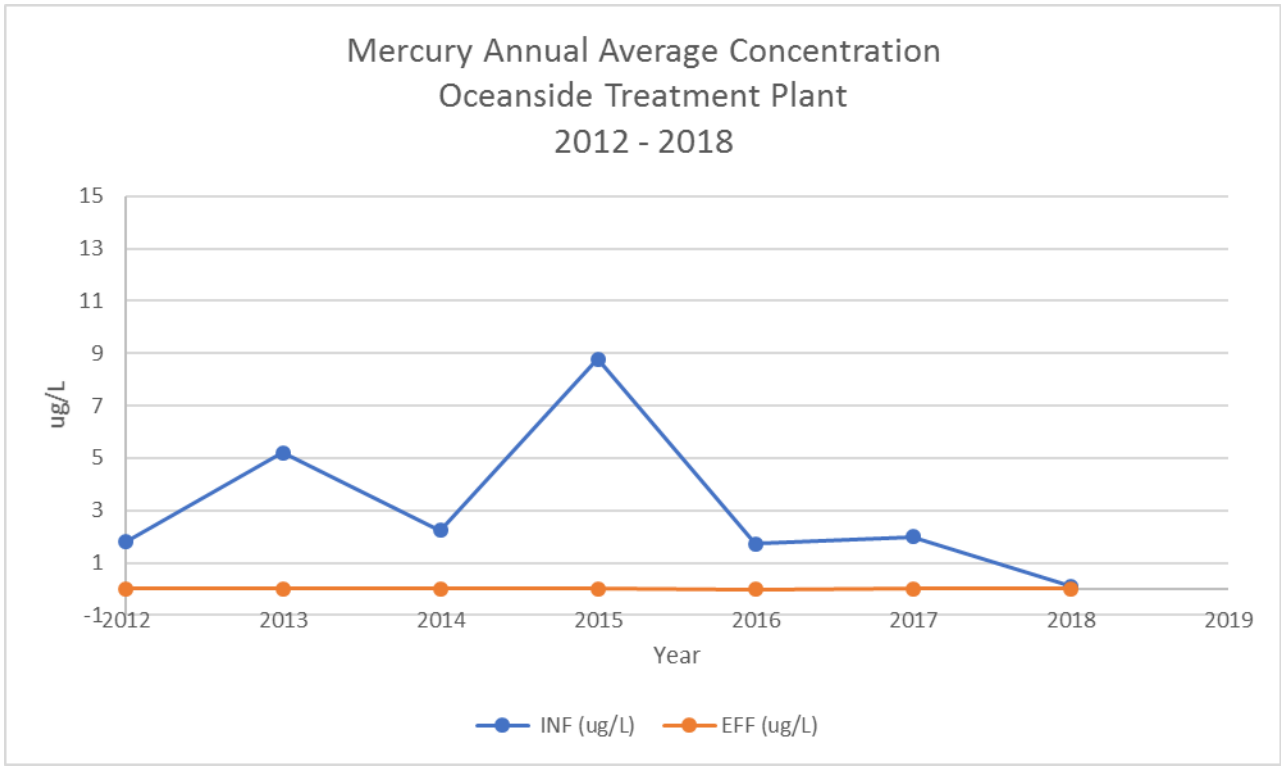


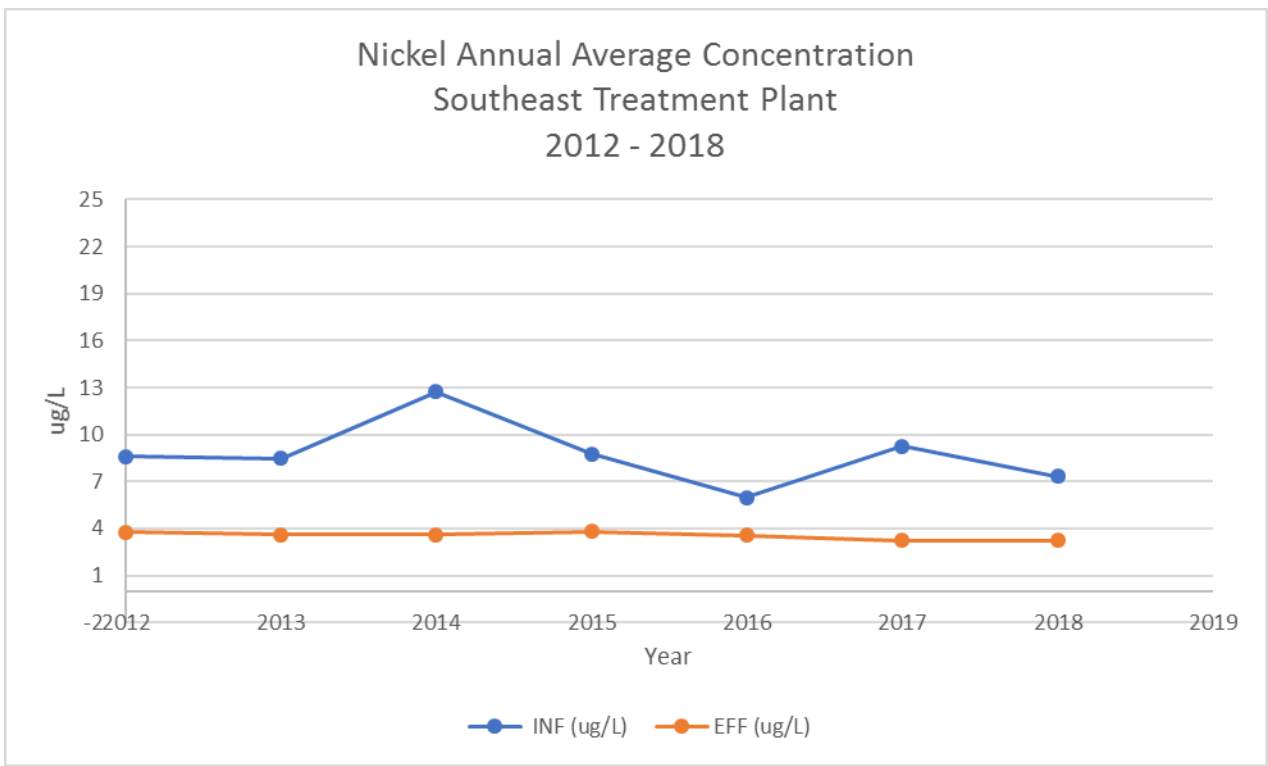
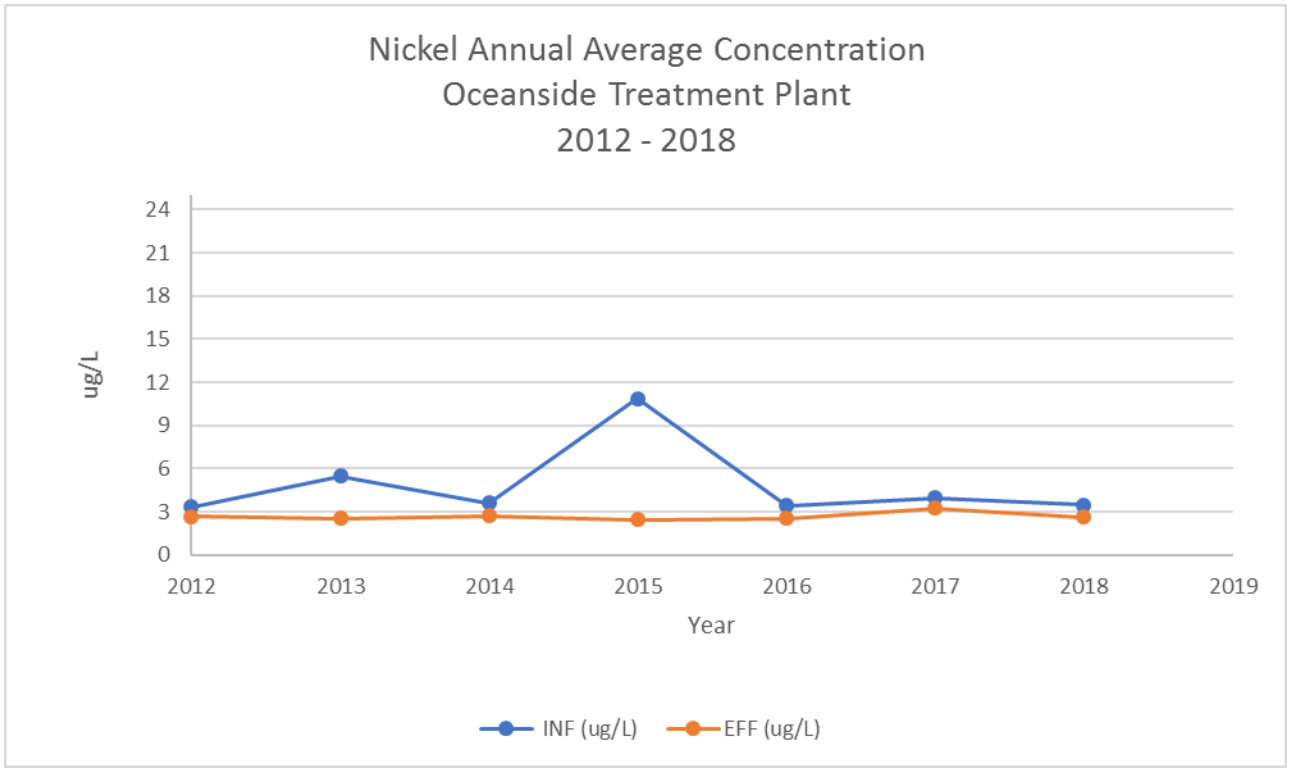


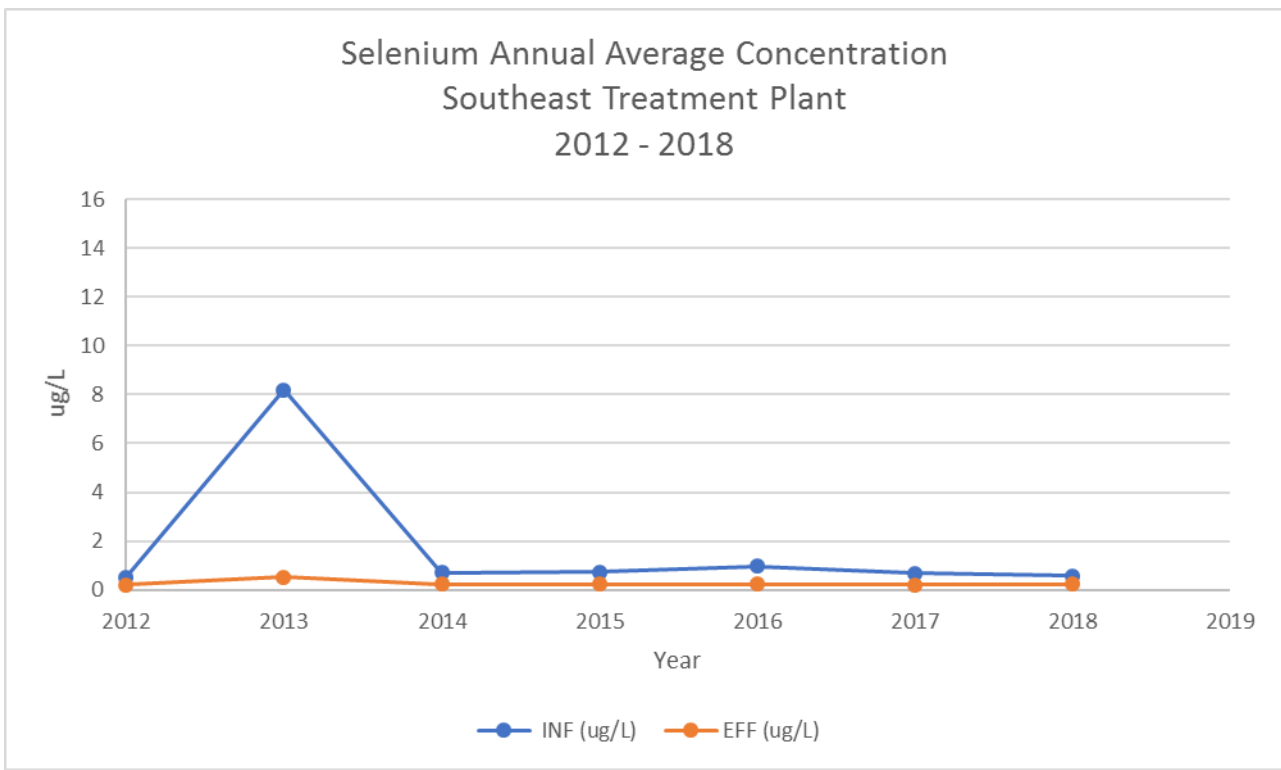
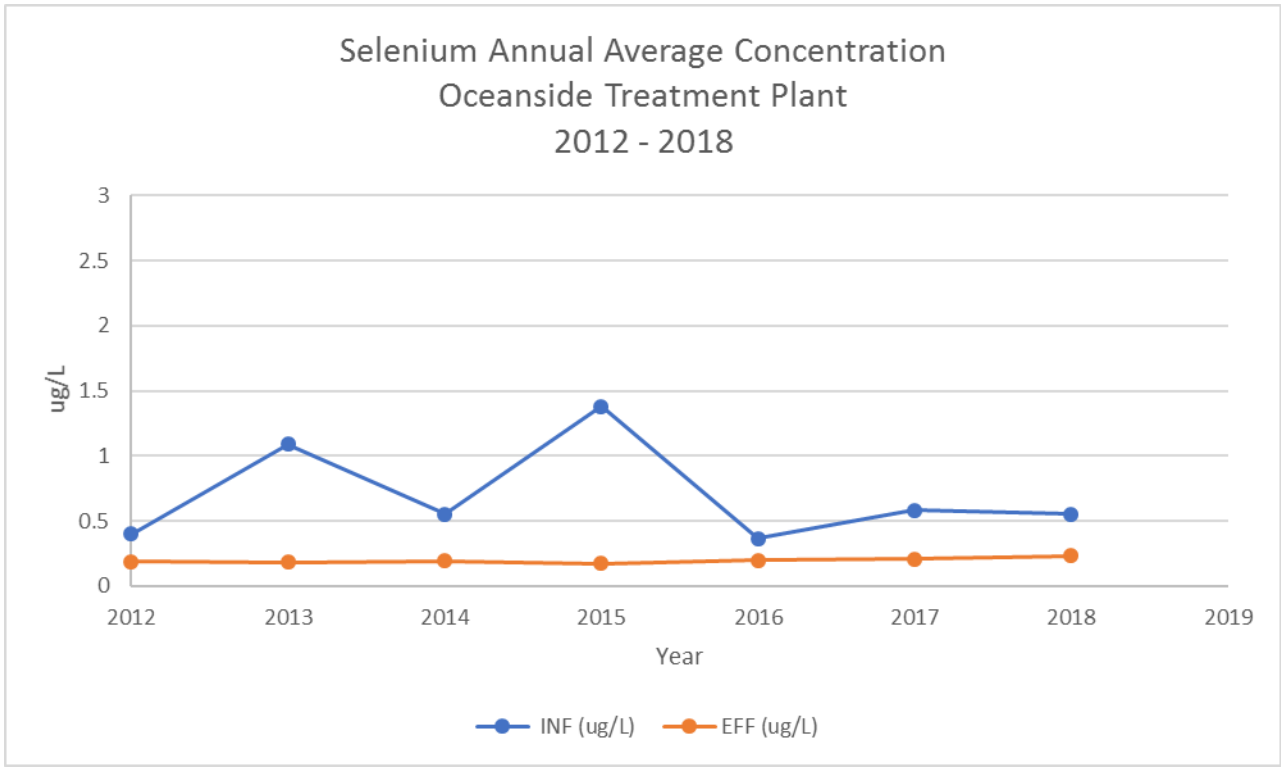


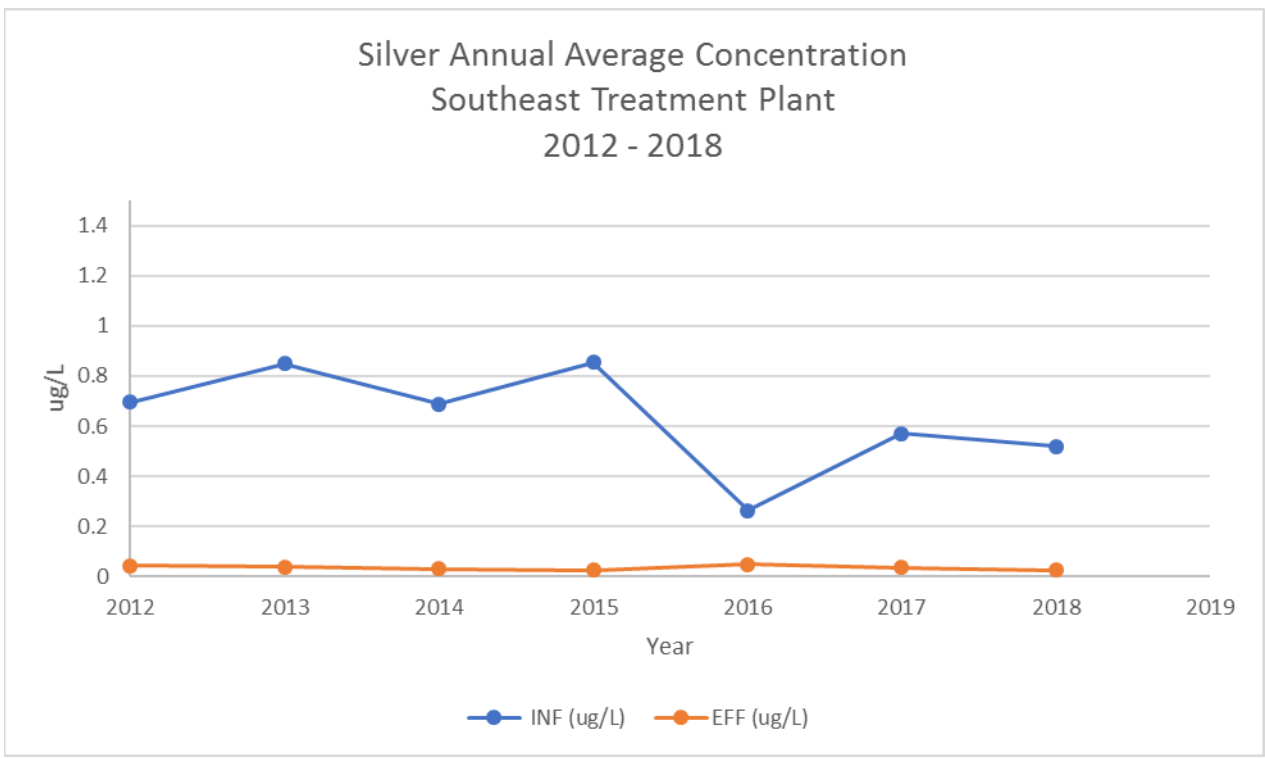
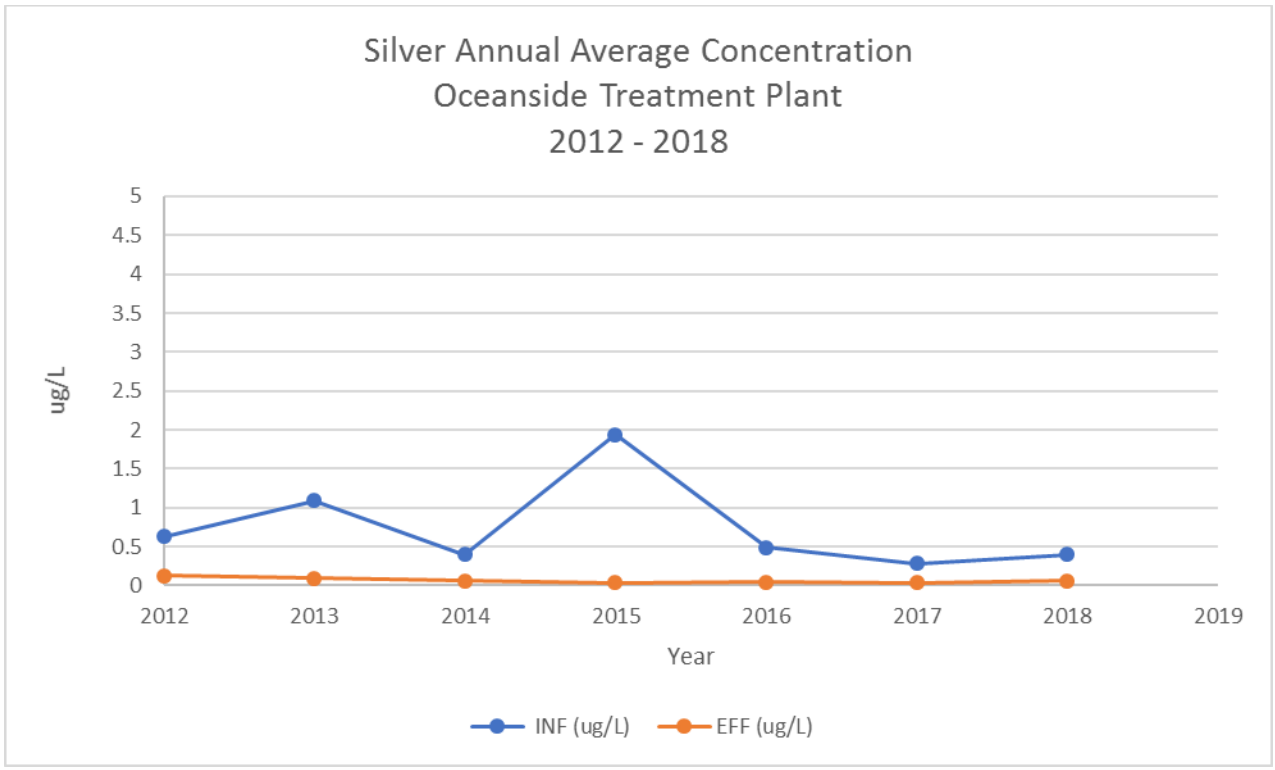


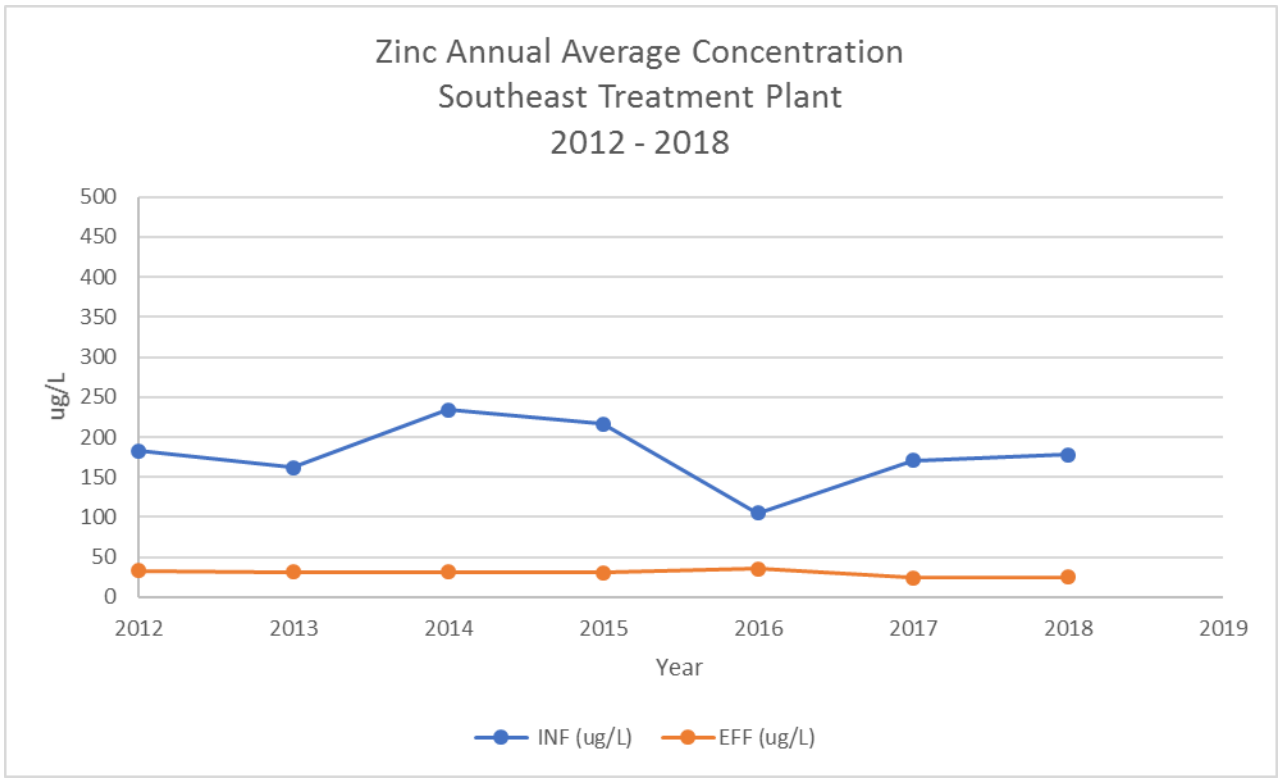
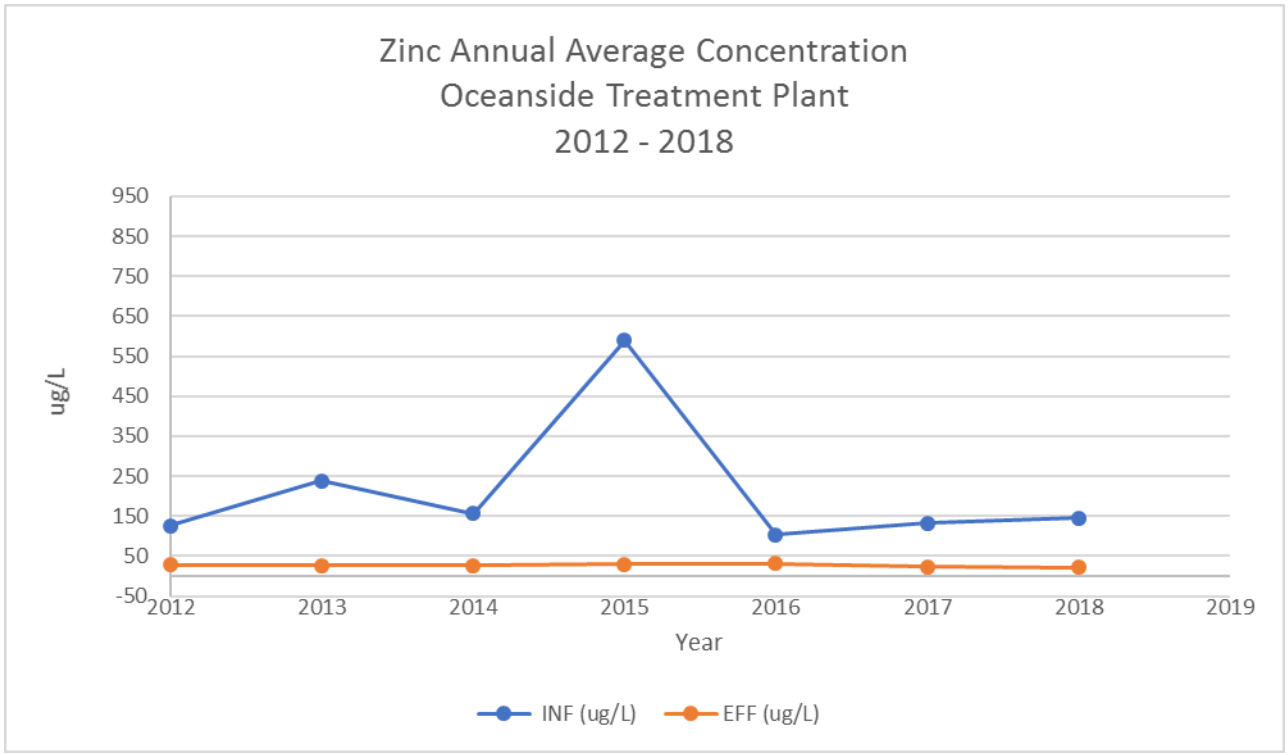












**TABLE 4.5-1 Monitoring Results for Pollutants Detected – OSP Influent, EPA Method 624**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
1,1-Dichloroethane	0.065	<	0.065	<	1.14	
1,4-Dichlorobenzene	0.085	<	0.085	<	0.087	DNQ
2-Chloroethyl vinyl ether	0.083	<	0.083	<	0.104	DNQ
Carbon tetrachloride	0.057	<	0.057	<	0.99	
Chloroform	0.886		0.698		0.065	<
Methylene chloride	0.349	DNQ	0.071	DNQ	0.067	<
Toluene	5.27		3.37		0.089	<
Vinyl chloride	0.157	<	0.157	<	0.087	DNQ

**TABLE 4.5-2 Monitoring Results for Pollutants Detected – OSP Influent, EPA Method 625**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
Bis-(2-ethylhexyl)-phthalate	12.1		2.9	DNQ	2.39	DNQ
Diethyl phthalate	1.77	DNQ	1.12	DNQ	1.22	DNQ
Di-n-butylphthalate	1.72	DNQ	0.876	DNQ	0.31	<
Pentachlorophenol	1.13	<	1.06	<	1.15	
Phenol	13.6		6.47		5.37	

**TABLE 4.5-3 Monitoring Results for Pollutants Detected – OSP Effluent, EPA Method 624**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	8/15/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
1,3-Dichlorobenzene	0.06	<	0.06	<	0.06	<	0.073	DNQ
Chloroform	1.27		0.971		0.878		1.07	
Methyl t-butyl ether	0.06	<	0.06	<	0.06	<	0.111	DNQ
Methylene chloride	0.271	DNQ	0.076	DNQ	0.104	DNQ	0.111	DNQ
Toluene	0.316	DNQ	0.185	DNQ	0.108	DNQ	0.664	

**TABLE 4.5-4 Monitoring Results for Pollutants Detected – OSP Effluent, EPA Method 625**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	8/15/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
Acenaphthylene	0.787	<	0.755	<	0.0213	DNQ	0.44	<
Bis-(2-ethylhexyl)-phthalate	1.65	DNQ	1.17	DNQ	1.01	DNQ	1.26	DNQ
Di-n-butylphthalate	0.5	DNQ	0.449	<	0.417	<	0.31	<
Di-n-octyl phthalate	0.809	<	0.776	<	0.72	<	0.13	<
Fluorene	0.755	<	0.724	<	0.0288	DNQ	0.29	<
Fuoranthene	0.574	<	0.551	<	0.015	DNQ	0.04	<
Pentachlorophenol	1	<	0.959	<	1.28		0.65	DNQ
Phenanthrene	0.511	<	0.49	<	0.0249	DNQ	0.16	<

**TABLE 4.5-5 Monitoring Results for Pollutants Detected –SEP Influent, EPA Method 624**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
1,2-Dichlorobenzene	0.113	<	0.113	<	0.113	<
1,2-dimethylbenzene	0.046	<	0.046	<	0.242	DNQ
1,3(1,4)-dimethylbenzene	0.089	<	0.089	<	0.423	DNQ
1,4-Dichlorobenzene	0.085	<	0.085	<	0.21	DNQ
Bromodichloromethane	0.091	DNQ	0.083	DNQ	0.067	<
Bromomethane	0.201	DNQ	0.352	DNQ	0.111	<
Chlorobenzene	0.053	<	0.115	DNQ	0.053	<
Chloroethane	0.811		1.37		0.087	<
Chloroform	4.52		5.06		3.79	
Chloromethane	0.857		5.16		1.01	
Ethylbenzene	0.028		0.028	<	0.126	
Methyl t-butyl ether	0.06	<	0.06	<	0.141	DNQ
Methylene chloride	0.198	DNQ	0.258	DNQ	0.23	DNQ
Tetrachloroethylene	0.4	DNQ	0.4	DNQ	0.309	DNQ
Toluene	0.863		5		4.22	
Trichloroethylene	0.152	DNQ	0.103	DNQ	0.11	DNQ

**TABLE 4.5-6 Monitoring Results for Pollutants Detected – SEP Influent, EPA Method 625**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
2,4-Dinitrotoluene	0.814	<	1.02	DNQ	0.16	<
Bis-(2-ethylhexyl)-phthalate	9.6		4.11	DNQ	3.99	DNQ
Diethyl phthalate	2.7		2.09	DNQ	2.36	
Di-n-butylphthalate	1.01	DNQ	1.04	DNQ	1.27	DNQ
Pyrene	0.452	<	0.43	<	0.02	<

**TABLE 4.5-7 Monitoring Results for Pollutants Detected – SEP Effluent, EPA Method 624**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
1,2-dimethylbenzene	0.046	<	0.046	<	0.049	DNQ
1,4-Dichlorobenzene	0.085	<	0.085	<	0.12	DNQ
Bromodichloromethane	0.112	DNQ	0.067	<	0.067	<
Bromoform	0.053	<	0.053	<	0.053	<
Chloroethane	0.373	DNQ	0.338	DNQ	0.376	DNQ
Chloroform	3.84		3.59		2.9	
Chloromethane	0.365	DNQ	0.424	DNQ	0.397	DNQ
Methyl t-butyl ether	0.06	<	0.06	<	0.138	DNQ
Methylene chloride	0.516		1.4		0.343	DNQ
Tetrachloroethylene	0.301	DNQ	0.191	DNQ	0.162	DNQ
Toluene	0.468	DNQ	0.436	DNQ	0.381	DNQ
Trichloroethylene	0.118	DNQ	0.065	<	0.065	<

**TABLE 4.5-8 Monitoring Results for Pollutants Detected – SEP Effluent, EPA Method 625**

Constituent	3/6/2018 ug/L	Qualifier	6/26/2018 ug/L	Qualifier	12/11/2018 ug/L	Qualifier
Bis-(2-ethylhexyl)-phthalate	1.15	DNQ	1.57	DNQ	1.58	DNQ
Butyl benzyl phthalate	0.421	<	0.465	DNQ	0.56	DNQ
Di-n-butylphthalate	0.492	DNQ	0.444	<	0.31	<
Pentachlorophenol	0.964	<	0.949	<	0.66	DNQ

## Discussion

### Volatile Organic Compounds (VOC) – EPA Method 624

Majority of the volatile organic compounds screened by EPA 624, were detected but not quantifiable.

### Base/Neutrals and Acid Extractable Compounds (Semi-volatile Organics, BNA) – EPA Method 625

Of the semi-volatile organic compounds identified by EPA 625, the compounds were identified as compounds in resins, disinfectants and medicinal products.

### Toxic Metals

The observed values were similar to historical values or lower than previously observed

## 4.2 Biosolids Monitoring

### 4.2.1 Sampling Locations

Biosolids samples at SEP are collected from the conveyor belts at a point just before discharge of residue into the receiving hopper, and at OSP from an access aperture above the receiving hopper.

### 4.2.2 Collection Times

In conformity with Appendix H-4, of Attachment H, the sampling of dewatered biosolids at both treatment plants is initiated on the same day that the influent and effluent monitoring of the treatment plant is conducted. Biosolids monitoring continues for a total of five consecutive days inclusively. It is assumed that biosolids production will occur concurrently for each of the five days, but this may not necessarily happen because of prevailing operational conditions. Therefore biosolids are sampled within the 5-day period as production is available. Manual grab sampling of the residue streams is done four times over each 24-hour period of each production day.

### 4.2.3 Collection Method

From the designated sampling point on the conveyor belt or receiving hopper, four individual 500-mL grab samples of biosolids are successively added to a 2½-gallon wide mouth glass "pickle jar" for a total of five operating days. The common collection jar is always maintained over ice in an ice chest before laboratory analysis.

These four daily grab samples are taken in an equally spaced time sequence over the daily period of the biosolids production, so that over five operating days, a total of twenty grabs will have been taken (assuming normal biosolids production during each operational day). Beakers of 500-mL capacity are

filled using Teflon™ spatulas. Sample collectors use disposable latex gloves when doing this work as a normal health and safety precaution.

Before aliquots are taken from the 2½-gallon common container for subsequent analyses, the contents are kneaded on a Teflon™ sheet to a uniform consistency while still cold. Aliquots are then taken from this for subsequent analyses. Table 4.7 summarizes the management of these aliquot samples.

All samples are maintained under close security for the duration of sample collection by authorized sampling personnel, and are then maintained in the Sample Receiving refrigerator until released to the analytical laboratory for subsequent analysis.

#### 4.2.4 Summary of Biosolids Aliquot Sample Distribution

The biosolids analytical data is analyzed by a contract laboratory, Eurofins. They provide the bottles and coolers utilized for the sampling event. The biosolids samples are composted in the laboratory then distributed accordingly to the pre-labeled bottles supplied by the contract laboratory.

#### 4.2.5 Holding Times

Samples are analyzed within the time period specified in the EPA regulations. (See *Federal Register*, October 26, 1984; 49 CFR 4323.4)

#### 4.2.6 Analytical Methodology

The EPA methods used in the analysis of the biosolids are summarized in Table 4.6. These methods are found in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, U.S. Environmental Protection Agency, November 1986, SW-846, Third Edition, as amended.

**TABLE 4.6 – Analytical Methods – Biosolids Samples**

Pollutant Parameter	EPA Method
Barium	6010B or C
Beryllium	6010B or C
Cadmium	6010B or C
Chromium	6010B or C
Cobalt	6010B or C
Copper	6010B or C
Lead	6010B or C
Manganese	6010B or C
Mercury	7470A or 7471A
Molybdenum	6010B or C
Nickel	6010B or C
Selenium	6010B or C
Silver	6010B or C
Thallium	6010B or C
Vanadium	6010B or C

Pollutant Parameter	EPA Method
Zinc	6010B or C
Volatile Organic Compounds (VOC)	8260B
Base/Neutral and Acid Extractables (SVOC)	8270C
Total Petroleum Hydrocarbons (TPH) as diesel	8015m
Polychlorinated biphenyls (PCBs)	8082
Organochlorine pesticides	8081A
Chlorinated dioxins and furans	1613B
Ammonia	S.M. 4500-NH <sub>3</sub> B or C
Total Kjeldahl Nitrogen (TKN)	S.M. 4500-N <sub>org</sub> B+NH <sub>3</sub> C
Ortho-phosphate	EPA 300
Total phosphorus	EPA 6010B
Nitrate and nitrite nitrogen	S.M. 4500-NO <sub>3</sub> F
Toxicity Characteristic Leachate Procedure (TCLP) <sup>a</sup>	EPA 1311
TCLP, Zero Headspace Extraction (ZHE) <sup>b</sup>	-
Waste Extraction Test (WET) <sup>c</sup>	CAM

<sup>a</sup> additional tests performed on TCLP extract: EPA Method 8081A, EPA Method 8082

<sup>b</sup> additional tests performed on TCLP ZHE extract: EPA Method 8260

<sup>c</sup> additional tests performed on WET extract: CAM 17 metals

#### 4.2.7 Monitoring Dates

Priority pollutant monitoring of the OSP and SEP biosolids was performed on the following dates listed in Table 4.7.

**TABLE 4.7 – Priority Pollutant Monitoring Dates – Biosolids Samples**

OSP	SEP
March 06 – March 10, 2018	March 06 – March 10, 2018
August 22 – August 26, 2018	August 22 – August 26, 2018

#### 4.2.8 Tabular Summary of Pollutants Detected

See Tables 4.8 and 4.9 for a list of pollutants detected and the discussion of results in the biosolids samples collected from the two treatment plants during both wet- and dry-weather seasons. Analytical laboratory reports, with the Quality Assurance and Quality Control (QA/QC) data validation from the above monitoring are available upon request.

**TABLE 4.8 -- List of Pollutants Detected and Discussion– SEP Biosolids**

**SEP Biosolids**

Sample Date: 3/06 – 3/10/18

Percent solids: 31.9% (values are reported in wet weight)

Constituent	Value (ug/kg)	EPA Method	MRL
2 Butanone (MEK)	4.07(J)	8260	5.2
Acetone	3.9(J)	8260	130
n-Butylbenzene	0.22(J)	8260	5.2
Carbon Disulfide	5.9(J)	8260	52
1,4-Dichlororbenzene	0.39(J)	8260	5.2
Ethylbenzene	0.26(J)	8260	5.2
Isopropyltoluene	9.5(J)	8260	5.2
Naphthalene	1.6(J)	8260	52
1,2,4-Trimethylbenzene	0.47(J)	8260	5.2
p/m-Xylene	0.00044(J)	8260	5.2
Tetrachloroethene	0.78(J)	8260	5.2
Tetrachloroethylyene	0.78(J)	8260	5.2
Bis(2-ethylhexyl) phthalate	0.0014	8270(C)	0.50
Dimethyl Phthalate	0.00015(J)	8270(C)	0.50

(J)- The analyte was either detected at or greater than the MDL and less than the MRL

**Discussion**

Volatile Organic Compounds (VOC)

The volatile organic constituents, (VOC), identified by EPA Method 8260 (B), are associated from sources of paints, coatings and exhaust fumes. The reported number of analytes detected has increased due to the lower reporting limits. All of the detected levels of the constituents are below the method reporting limit. Two chemicals are listed as Priority Pollutants, however, the values are significantly lower than the MRL.

Base/Neutrals and Acid Extractable Compounds (Semi-volatile Organics)

The semi-volatile organic compounds (SVOC) identified by EPA Method 8270(C) are substances associated as plasticizers. The organic compounds are constituents identified as Priority Pollutants with broad applications.

**SEP Biosolids**

Sample Date: 8/22/18 – 8/26/18

Percent solids : 24.7% (values are reported in wet weight)

Constituent	Value (ug/kg)	EPA Method	MRL
Acetone	13.9(J)	8260	130
2 Butanone (MEK)	9.5(J)	8260	51
Ethylbenzene	0.25(J)	8260	5.1
p-Isopropyltoluene	9.3(J)	8260	5.1
Methyl Chloride	6.0(J)	8260	51
4-Methyl-2-Pentanone	7.1(J)	8206	5.1
Napthalene	2.2(J)	8260	51
Toluene	1.1	8260	5.1
1,2,4-Trimethylbenzene	0.93(J)	8260	5.1
p/m-Xylene	0.47	8260	5.1
Di-n-Butyl Phthalate	0.41(J)	8270C	0.50
Phenanthrene	0.076(J)	8270(C)	0.50

Constituent	Value (ug/kg)	EPA Method	MRL
Pyrene	0.086(J)	8270(C)	0.50

(J)- The analyte was either detected at or greater than the MDL and less than the MRL

## Discussion

### Volatile Organic Compounds (VOC)

All volatile organic constituents, (VOC), identified by EPA Method 8260, were measured below the method reporting limits, except for carbon tetrachloride had not been observed in any prior sampling event; although the detected amount is small, future sampling events will be followed closely. The associated constituents are from sources of paints, coatings and exhaust fumes.

### Base/Neutrals and Acid Extractable Compounds (Semi-volatile Organics)

Two of the semi-volatile organic compounds (SVOC) identified by EPA Method 8270(C) are organic substances associated as aromatics and are identified as Priority Pollutants. The other compound is utilized as a plasticizer.

**TABLE 4.9 -- List of Pollutants Found and Discussion– OSP Biosolids**

### OSP Biosolids

Sample Date: 3/06/18 – 3/10/18

Percent solids: 33.7% (values are reported in wet weight)

Constituent	Value (ug/kg)	EPA Method	MRL
Acetone	12(J)	8260	130
Benzene	0.63(J)	8260	5
Carbon Disulfide	2.4(J)	8260	50
Ethyl benzene	0.22(J)	8260	5
p-Isopropyltoluene	4.7(J)	8260	5
Toluene	20	8260	5
M,p-Xylenes	0.28(J)	8260	5
Bis(2-ethylhexyl) phthalate	0.0021	8270	0.5
Dimethyl Phthalate	0.00015(J)	8270(C)	0.50

(J)- The analyte was either detected at or greater than the MDL and less than the MRL

## Discussion

### Volatile Organic Compounds (VOC)

The volatile constituents, (VOC), identified by EPA Method 8260 detected two priority pollutants, which are ubiquitous in the environment. The other detectable volatile compounds are solvents used in varied applications. All but one constituent was detected were below the method reporting limit.

### Base/Neutrals and Acid Extractable Compounds (Semi-volatile Organics)

The semi-volatile organic compounds (SVOC) identified by EPA Method 8270(C) are plasticizers and are identified on the EPA Method 625 list as priority pollutant.

### OSP Biosolids

Sample Date: 8/22/18 – 8/26/18

Percent solids: 19.6% (values are reported in wet weight)

Constituent	Value (mg/kg)	EPA Method	MRL
Carbon disulfide	0.77(J)	8260	50

Constituent	Value (mg/kg)		MRL
p-Isopropyltoluene	3.7(J)	8260	5.0
Methylene Chloride	30(J)	8260	50
Naphthalene	1.4(J)	8260	50
Toluene	0.86(J)	8260	5.0
Trichlorofluoromethane	0.57(J)	8260	50
M,p-Xylenes	0.40(J)	8260	5.0
Bis(2-ethylhexyl) phthalate	0.0032	8270	0.002
Dimethyl Phthalate	0.00048(J)	8270	0.002
3/4/ Methylphenol	0.00073(J)	8270	0.002

(J)- The analyte was either detected at or greater than the MDL and less than the MRL

## Discussion

### Volatile Organic Compounds (VOC)

The volatile constituents, (VOC), identified by EPA Method 8260 are are solvents used in varied applications. All detections were below the method reporting limit.

### Base/Neutrals and Acid Extractable Compounds (Semi-volatile Organics)

Three semi-volatile organic compounds (SVOC) were identified by EPA Method 8270(C). Two of the compounds was identified as priority pollutant plasticizers. The other compound is a precursor product.

**TABLE 4.10 -- List of Metals Detected and Discussion – Biosolids Samples**

METALS detected in Biosolids	
Antimony	Mercury
Arsenic	Molybdenum
Barium	Nickel
Cadmium	Selenium
Chromium	Silver
Copper	Zinc
Lead	

## Discussion

The monitoring requirements for the Municipal Solid Waste Landfills include total toxic metals, which are: arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, and zinc. Additional metals of analysis completed include antimony, barium, beryllium, cobalt, molybdenum, thallium and vanadium. Beryllium and thallium were not detected in any biosolids sample. All other observed values are within the historically observed range.

The biosolids for OSP was re-sampled in July during the period of 7/11/18 – 7/15/18. This sample was analyzed only for cyanide. The observed value from the previous 5-day composite sample yielded an elevated value not consistent with historical values for OSP. The re-sample observed a “ND” value with a MDL of 0.22 and RL of 0.50 mg/kg; which is the typical observed value.

## **5 INSPECTION, SAMPLING AND ENFORCEMENT PROGRAM**

### **5.1 Inspection and Sampling Frequency**

Significant Industrial Users, (SIU), are inspected annually and sampled at least semi-annually. Non-significant Industrial Users that could generate wastewater with pollutants of concern are inspected and are sampled on a case-by-case basis. The frequency of sampling depends on the nature of the IU's operations, volume of discharge, toxicity of pollutants discharged and compliance history. WWE/CSD has separated the functions of inspection and sampling. Our Pretreatment Enforcement Section performs all inspections and the Field Monitoring Section performs all sampling to determine compliance with applicable discharge limits.

### **5.2 Annual or Initial Inspection**

A routine annual inspection is typically preceded by a review of the IU's file and compliance history by the assigned Wastewater Control Inspector. Except for the file review, an initial inspection is conducted following the same procedure as an annual inspection. For an initial inspection, the permit application will also be reviewed. The inspector usually schedules the inspection visit with a knowledgeable and authorized representative of the IU. The inspection begins with an interview with the representative to clarify our authority and purpose. The inspector will also determine some basic information about the operations such as number of employees and work hours. The inspector then proceeds to take an accompanied tour of the facility, using a standard inspection form to record his/her observations. Items of particular interest include the following:

- Types of process operations
- Processes that use water
- Processes that result in waste discharges
- Chemical use and access to Safety Data Sheets
- Chemical storage areas and containment
- Pretreatment equipment
- Waste manifests and maintenance records
- Viable sampling points
- Stormwater BMPs

The inspector then conducts a closing interview with the facility representative, pointing out any areas of concern, such as absence of pretreatment equipment maintenance logs, or inadequate secondary containment of hazardous chemicals.

Upon returning to the office the inspector performs the data entry into the WWE/CSD's Pretreatment Information Management System (PIMS) to complete an electronic record of the inspection report. A hard copy of this report is put into the IU file and an electronic copy is downloaded into Sharepoint for added redundancy.

### **5.3 Follow-up Inspection**

A follow-up inspection can be performed for a variety of reasons, including the following issues:

- Compliance
- Sampling point
- Sewer service charge billing
- Permit application

## **5.4 IU Permits**

WWE/CSD issues wastewater discharge permits to IUs as the control mechanism for informing them of the prohibitions and limitations, including BMPs, which apply to waste discharges to the sewer system. The permits also specify any particular compliance and reporting requirements such as requirements to control slug discharges. IUs are required to submit permit applications for initial permits as well as for renewals. The permits for SIUs are issued for a term of three (3) years and those for non-significant industrial users are for a term of five (5) years.

## **5.5 Chain of Custody Procedures**

WWE/CSD's Field Monitoring Section (FMS) performs all field monitoring activities. FMS staff members log the necessary field data into the electronic PIMS for all wastewater samples collected, to generate a serialized sample label and field record report. An assigned quality control staff member verifies the data entry, validates the samples, collects samples to be transported to the Southeast Laboratory (which performs the analyses), logs the transfer into the system, and produces a data summary document for transmission to the laboratory. This summary document contains all the sample information needed by the laboratory, including the analyses to be performed.

After logging and documentation, the samples are placed in the FMS refrigerator to await Quality Assurance/Quality Control (QA/QC) checks. The assigned QA/QC supervisor checks the paperwork for completeness and accuracy, signs the document, and submits the attendant documentation to the laboratory with the samples for analysis. The laboratory uses an electronic Laboratory Information Management System (LIMS) to record its analytical procedures, QA/QC information and the analytical results. The pretreatment accesses the data which are uploaded into the PIMS when the laboratory releases the data.

San Francisco Public Utilities Commission (SFPUC) employees retain custody of wastewater samples from collection through analysis. That custody can be displayed electronically on the combined PIMS and LIMS, and a hardcopy can be printed to if necessary. Only samples that are sent to an outside laboratory (because the analyses cannot be performed by the Southeast Laboratory) are accompanied by a paper chain-of-custody document.

## **5.6 Enforcement Response Plan**

The Enforcement Response Plan is under review and updates will be implemented, pending the Sewer Use Ordinance update currently in progress. Once the updated Sewer Use Ordinance is finalized, the Enforcement Response Plan will follow suit. Part of the review process includes the City Attorney approval, then to the SFPUC Commission and lastly, to the Board of Supervisors.

The current Enforcement Response Plan meets the requirements of current EPA General Pretreatment Regulations (40 CFR 403.8 (f)(5)). It contains detailed procedures indicating how WWE/CSD will investigate and respond to instances of industrial user noncompliance. The plan incorporates the following requirements:

- Describes how WWE/CSD will investigate instances of noncompliance;
- Describes the types of escalating enforcement responses the WWE/CSD will take in response to all anticipated types of industrial user violations and the time periods within which responses will take place;

- Identifies (by title) the official(s) responsible for each type of response; and adequately reflects WWE/CSD’s primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8 (f)(1) and (f)(2).

## 6.0 UPDATED LIST OF REGULATED SIUs

### 6.1 Categorical Industrial Users

A list of all of the federal categories that apply to the SIUs regulated by WWE/CSD is displayed in Table 6.1. The table also includes the number of categorical industrial users (CIUs) per category. A list of the three (3) CIUs is displayed in Table 6.2.

During the reporting period no CIUs were added to the previous list.

**TABLE 6.1 – Federal Categorical Industrial Users**

Category	No. of CIUs
40 CFR Parts 413.14 & 413.24 (PSES) – Electroplating – Common Metals & Precious Metals Subcategories (<38,000 L/Day)	1
40 CFR Part 464.16 (PSNS) – Metal Molding and Casting (Aluminum Casting Subcategory)	1
40 CFR Part 433.15 (PSES) – Metal Finishing	1

**TABLE 6.2 – List of Regulated CIUs**

SIC/ID	Industrial User	Business Address	City	Zip	Reason for SIU Classification
3471/00299	Biro & Sons, Inc.	1160 Folsom St.	San Francisco	94103	40 CFR Parts 413.14 & 413.24
3365/03088	Ermico Enterprises, Inc.	1111 17th St.	San Francisco	94107	40 CFR Part 464.16
3469/00296	United States Mint	155 Hermann St.	San Francisco	94102	40 CFR Part 433.15

## 6.2 Applicable Categorical Standards and Local Limits

The applicable categorical pretreatment standards and local limits for the CIUs are presented in Tables 6.3, 6.4, and 6.5. None of the applicable standards or limits required the application of the combined wastestream formula, because WWE/CSD samples the discharging CIUs at the end of the regulated processes to check for compliance.

Ermico Enterprises is classified as 40 CFR Part 433.15 due to the aluminum casting process at the facility. However, the wastestream associated with that process is not discharged to the sanitary sewer. The facility was reissued a permit in June 2018, reflecting that the wastestream that is discharged from the facility is subject to the local limits displayed in Table 6.7.limits.

**TABLE 6.3 – Federal Categories, Standards & Local Limits**

**FEDERAL INDUSTRIAL CATEGORY: 413.14 & 413.24 (PSES) - ELECTROPLATING (<38,000 L/day)**

SIC CODE - DISCH. NO.	INDUSTRIAL USER NAME & ADDRESS	FEDERAL STANDARDS		LOCAL STDS. IN ADD'N TO FED. STDS.			COMMENTS	
		PARAMETER	LIMITS	PARAMETER	LIMITS	SAMPLE		
3471-00299	Biro & Sons, Inc. 1160 Folsom Street	CN(A) Pb Cd TTO	(1)	(2)	pH	6.0-9.5	G	CIU classification because of job shop electroplating of common and precious metals, which are subject to 40 CFR Part 413.14 & Part 413.24 (PSES)
			5.0 [G]	2.7 [G]	DS	0.5 mg/L	G	
			0.6 [C]	0.4 [C]	Temp.	125 °F max	G	
			1.2 [C]	0.7 [C]	Hydr. O & G	100 mg/L	G	
			4.57 [G]	NA	O & G (T)	300 mg/L	G	
					As	4.0 mg/L	C	
					Cd	0.5 mg/L	C	
					Cr	5.0 mg/L	C	
					Cu	4.0 mg/L	C	
					Pb	1.5 mg/L	C	
					Hg	0.05 mg/L	C	
					Ni	2.0 mg/L	C	
					Ag	0.6 mg/L	C	
					Zn	7.0 mg/L	C	
					Phenols	23.0 mg/L	G	
		CN(T)	1.0 mg/L	G				
DS - Dissolved sulfides, mg/L		G or [G] - Grab sample		(1) Maximum for any one day, mg/L				
Hydr. O & G - Hydrocarbon Oil & Grease		C or [C]- Composite sample		(2) Average of daily values for four consecutive monitoring days, mg/L				
O & G(T) - Total Recoverable Oil & Grease		NA - Not applicable		TTO - Total Toxic Organics				

**TABLE 6.4 – Federal Categories, Standards & Local Limits**

**FEDERAL INDUSTRIAL CATEGORY: 464.16 (PSNS) - METAL MOLDING AND CASTING (ALUMINUM CASTING SUBCATEGORY)**

SIC CODE - DISCH. NO.	INDUSTRIAL USER NAME & ADDRESS	FEDERAL STANDARDS		LOCAL STDS. IN ADD'N TO FED. STDS.			COMMENTS	
		PARAMETER	LIMITS	PARAMETER	LIMITS	SAMPLE		
3365-03088	Ermico Enterprises, Inc. 1111 17th Street		(1)	(2)				
		Cu(T)	0.017	0.009	pH	6.0-9.5	G	CIU classification because of an aluminum casting process used in manufacturing of skateboard trucks, which is subject to 40 CFR Part 464.16 (PSNS)
		Pb(T)	0.018	0.009	DS	0.5 mg/L	G	
		Zn(T)	0.025	0.01	Temp.	125 °F max	G	
					Hydr. O & G	100 mg/L	G	
					O & G (T)	300 mg/L	G	
					As	4.0 mg/L	C	
					Cd	0.5 mg/L	C	
					Cr	5.0 mg/L	C	
					Cu	4.0 mg/L	C	
					Pb	1.5 mg/L	C	
					Hg	0.05 mg/L	C	
					Ni	2.0 mg/L	C	
			Ag	0.6 mg/L	C			
			Zn	7.0 mg/L	C			
			Phenols	23.0 mg/L	G			
			CN(T)	1.0 mg/L	G			
DS - Dissolved sulfides, mg/L		G - Grab sample		(1) Maximum for any one day, kg/1,000 kkg of metal poured				
Hydr.O & G - Hydrocarbon Oil & Grease		C - Composite sample		(2) Maximum monthly average, kg/1,000 kkg of metal poured				
O & G (T) - Total Recoverable Oil & Grease		NA - Not applicable						

**TABLE 6.5 – Federal Categories, Standards & Local Limits**

**FEDERAL INDUSTRIAL CATEGORY: 433.15 (PSES) - METAL FINISHING**

SIC CODE - DISCH. NO.	INDUSTRIAL USER NAME & ADDRESS	FEDERAL STANDARDS		LOCAL STDS. IN ADD'N TO FED. STDS.			COMMENTS	
		PARAMETER	LIMITS	PARAMETER	LIMITS	SAMPLE		
3469-00296	U.S. Mint 155 Hermann Street		(1)	(2)				
		Cd(T)	0.69 [C]	0.26 [C]	pH	6.0-9.5	G	CIU classification because of coin blank preparation used in the manufacturing of proof coins, which is subject to 40 CFR Part 433.15 (PSES)
		Cr(T)	2.77 [C]	1.71 [C]	DS	0.5 mg/L	G	
		Cu(T)	3.38 [C]	2.07 [C]	Temp.	125 °F max	G	
		Pb(T)	0.69 [C]	0.43 [C]	Hydr. O & G	100 mg/L	G	
		Ni(T)	3.98 [C]	2.38 [C]	O & G (T)	300 mg/L	G	
		Ag(T)	0.43 [C]	0.24 [C]	As	4.0 mg/L	C	
		Zn(T)	2.61 [C]	1.48 [C]	Cd	0.5 mg/L	C	
		CN(T)	1.20 [G]	0.65 [G]	Cr	5.0 mg/L	C	
		TTO	2.13 [G]	NA	Cu	4.0 mg/L	C	
					Pb	1.5 mg/L	C	
					Hg	0.05 mg/L	C	
					Ni	2.0 mg/L	C	
			Ag	0.6 mg/L	C			
			Zn	7.0 mg/L	C			
			Phenols	23.0 mg/L	G			
			CN(T)	1.0 mg/L	G			
DS - Dissolved sulfides, mg/L		G - Grab sample		(1) Maximum for any one day, mg/L				
Hydr.O & G - Hydrocarbon Oil & Grease		C - Composite sample		(2) Maximum monthly average, mg/L				
O & G (T) - Total Recoverable Oil & Grease		NA - Not applicable						

### Non-categorical Significant Industrial Users

A list of the fourteen (14) non-categorical SIUs regulated by WWE/CSD is displayed in Table 6.6. All the SIUs have been classified as such, because they discharge more than twenty-five thousand (25,000) gallons per day of process wastewater. These SIUs are subject to the local limits displayed in Table 6.7.

- Bay Area Linens and Valet was issued a permit in July 2018, and is included in the list.
- Cal-Pacific Medical Center, Pacific Campus facility was closed in August 2018. The new facility opened in October 2018. The new facility is permitted as a non-significant industrial user, and is not included in Table 6.6, however, its compliance status for 2018 is included in Table 7.2.
- Evergood Sausage Companys facility was re-classified as a non-significant industrial user in July 2018, and is not included in Table 6.6. Its compliance status for 2018 is included in Table 7.2.
- Golden Gate Soy Products was not previously reported in Table 6.6, however, they have been a permitted SIU since 2014.

**TABLE 6.6 – List of Regulated Non-categorical SIUs**

SIC/ID	Industrial User	Business Address	Business Activity
7213/01559	ALSCO	1575 Indiana St., San Francisco, 94107	Commercial linen service
2082/00047	Anchor Brewing Company	1705 Mariposa St., San Francisco, 94107	Brewery
7213/IU130 08742	Bay Area Linens and Valet Service	100 Cypress Street Brisbane, CA 94005	Commerical linen service
8062/00936	Cal-Pacific Medical Center, Pacific Campus	2333 Buchanan St., San Francisco, 94115	Hospital
2077/00044	Darling Ingredients	429 Amador St., San Francisco, 94124	Rendering plant
2075/01139	Golden Gate Soy Products	1265 Griffith Street, San Francisco, CA 94124	Soybean cake manufacturer
8062/00933	Kaiser Permanente San Francisco Medical Center, Geary Campus	2425 Geary Blvd., San Francisco, 94115	Hospital
8062/00937	Saint Francis Memorial Hospital	900 Hyde St., San Francisco, 94109	Hospital
8062/00943	San Francisco General Hospital	1001 Potrero Ave., San Francisco, 94110	Hospital
4000/02008	San Francisco Presidio Water Treatment Plant	1773 Gibson Road, San Francisco, CA 94129	Water Treatment Plant
8221/00934	University of California San Francisco, Main Campus	400 – 700 Parnassus Ave., San Francisco, 94122	Hospital/Medical teaching and research university
8221/02205	University of California San Francisco, Mission Bay Campus	600 16th St., San Francisco, 94107	Hospital/Medical research facility

SIC/ID	Industrial User	Business Address	Business Activity
8062/00935	University of California San Francisco, Mount Zion Campus	1600 Divisadero St., San Francisco, 94115	Hospital
8062/00940	US Department of Veterans Affairs Medical Center	4150 Clement St., San Francisco, 94121	Hospital

### 6.3 Applicable Local Limits

Table 6.7 lists the current local limits, which are contained in Section 123 of Article 4.1 (the City’s sewer use ordinance), and in the City’s Department of Public Works (DPW) Order No. 158170 (1991):

**TABLE 6.7 – Local Limits**

Pollutant parameter	LIMIT (mg/L)*
Arsenic	4.0
Cadmium	0.5
Chromium	5.0
Copper	4.0
Cyanide (Total)	1.0
Lead	1.5
Mercury	0.05
Nickel	2.0
Oil and grease (Hydrocarbon)	100
Oil and grease (Total)	300
pH	6.0 min.; 9.5 max. (pH Units)
Phenols	23.0
Silver	0.6
Sulfides (Dissolved)	0.5
Zinc	7.0

(\* as total)

## 7 SIU COMPLIANCE ACTIVITIES

### 7.1 Inspection, Sampling and Enforcement Summary

The inspection and sampling activities, and the compliance status and enforcement actions for CIUs are displayed in Table 7.1.

The inspection and sampling activities, and the compliance status and enforcement actions for all non-categorical SIUs are displayed in Table 7.2.

**TABLE 7.1 – Inspection, Sampling, Compliance and Enforcement Summary for CIUs**

**FEDERAL INDUSTRIAL CATEGORY: 413.14 & 413.24 (PSES) - ELECTROPLATING (<38,000 L/day)**

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN					
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other
3471-00299 Biro & Sons, Inc. 1160 Folsom St.	1	0/1	0/1		0/1	CC						
	2	1/0	1/0		1/0	NS						
	3	0/1	0/1		0/1	CC						
	4	0/0	0/0		0/0	NS						
<b>Inspection &amp; Sampling Headings</b> Sch - Number of planned inspections and/or sampling events <span style="float: right;">(All sampling performed by POTW)</span> Actual - Actual number of inspections and/or sampling events Spill - Number of inspections and /or sampling events in response to spills or emergencies  <b>Compliance Status Keys</b> SF-Significant Non-Compliance: Federal Limits SL-Significant Non-Compliance: Local Limits IF - Inconsistent Compliance: Fed Limits IL - Inconsistent Compliance: Local Limits M - Minor noncompliance CC - Consistent Compliance TS - On a Time Schedule U - Unknown NS - No Sampling Scheduled												

**FEDERAL INDUSTRIAL CATEGORY: 464 - METAL MOLDING AND CASTING (ALUMINUMCASTING SUBCATEGORY)**

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN					
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other
3365-03088 Ermico Enterprises, Inc. 1111 17th St.	1	0/0	0/0		0/0	NS						
	2	0/1	1/1		1/1	CC						reissued permit 6/28/18
	3	0/0	1/1		0/0	CC						
	4	1/1	0/0		0/1	NS						
<b>Inspection &amp; Sampling Headings</b> Sch - Number of planned inspections and/or sampling events <span style="float: right;">(All sampling performed by POTW)</span> Actual - Actual number of inspections and/or sampling events Spill - Number of inspections and /or sampling events in response to spills or emergencies  <b>Compliance Status Keys</b> SF-Significant Non-Compliance: Federal Limits SL-Significant Non-Compliance: Local Limits IF - Inconsistent Compliance: Fed Limits IL - Inconsistent Compliance: Local Limits M - Minor noncompliance CC - Consistent Compliance TS - On a Time Schedule U - Unknown NS - No Sampling Scheduled												

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**FEDERAL INDUSTRIAL CATEGORY: 433.15 (PSES) - METAL FINISHING**

INDUSTRIAL USER		INSPECTION / SAMPLING				ENFORCEMENT ACTION TAKEN						
SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	Sch This Year	Actual	Spill	Sch Next Year	Compliance Status	Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other
3469-00296 U.S. Mint 155 Hermann St.	1	1/1	0/1		1/1	M	X	(EPA 624 TTO)				
	2	0/0	1/0		0/0	NS						
	3	0/1	0/1		0/1	CC						
	4	0/0	0/0		0/0	NS						
<p><b>Inspection &amp; Sampling Headings</b>                      Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)                      Actual - Actual number of inspections and/or sampling events                      Spill - Number of inspections and /or sampling events in response to spills or emergencies</p> <p><b>Compliance Status Keys</b>                      SF-Significant Non-Compliance: Federal Limits                      SL-Significant Non-Compliance: Local Limits                      IF - Inconsistent Compliance: Fed Limits                      IL - Inconsistent Compliance: Local Limits</p> <p>M - Minor noncompliance                      CC - Consistent Compliance                      TS - On a Time Schedule                      U - Unknown                      NS - No Sampling Scheduled</p>												

**TABLES 7.2 – Inspection, Sampling, Compliance and Enforcement Summary for SIUs**

**NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS**

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN															
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other										
7213-01559 ALSCO 1575 Indiana St.	1	0/1	0/1		1/1	CC																
	2	0/0	1/0		0/0	NS																
	3	0/0	0/1		0/1	IL	O&G															
	4	1/1	0/0		0/0	IL																
2082-00047 Anchor Brewing Co. 1705 Mariposa St.	1	1/1	0/0		1/1	NS																
	2	0/0	1/1		0/0	CC																
	3	0/1	0/0		0/1	NS																
	4	0/0	0/1		0/0	CC																
7213-IU13008742 Bay Area Linens and Valet Service 100 Cypress St Brisbane CA, 94005	1	0/0	0/0		1/1																	
	2	0/0	1/0		0/0																	
	3	0/0	0/0		0/1	N/S			Permitted in July													
	4	0/0	0/0		0/0	N/S																
<p><b>Inspection &amp; Sampling Headings</b>                      Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)                      Actual - Actual number of inspections and/or sampling events                      Spill - Number of inspections and /or sampling events in response to spills or emergencies</p> <p><b>Compliance Status Keys</b></p> <table style="width: 100%;"> <tr> <td>SF-Significant Non-Compliance: Federal Limits</td> <td>M - Minor noncompliance</td> </tr> <tr> <td>SL-Significant Non-Compliance: Local Limits</td> <td>CC - Consistent Compliance</td> </tr> <tr> <td>IF - Inconsistent Compliance: Fed Limits</td> <td>TS - On a Time Schedule</td> </tr> <tr> <td>IL- Inconsistent Compliance: Local Limits</td> <td>U - Unknown</td> </tr> <tr> <td></td> <td>NS - No Sampling Scheduled</td> </tr> </table>													SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance	SL-Significant Non-Compliance: Local Limits	CC - Consistent Compliance	IF - Inconsistent Compliance: Fed Limits	TS - On a Time Schedule	IL- Inconsistent Compliance: Local Limits	U - Unknown		NS - No Sampling Scheduled
SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance																					
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	NS - No Sampling Scheduled																					

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NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN					
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other
8062-00938 Cal-Pacific Med. Center St. Lukes Campus 3555 Cesar Chavez St.	1	0/1	0/1			CC						
	2	1/0	1/0			NS						
	3	0/1	0/1			CC						
	4						CPMC St. Lukes closed. New facility reopened as CPMC Mission Bernal.					
8062-00936 Cal-Pacific Med. Center Pacific Campus 2333 Buchanan St.	1	1/1	1/1		0/1	M	X	(MERCURY)				
	2	0/0	0/1		1/0	CC						
	3	0/1	0/0		0/1	NS						
	4	0/0	0/1		0/0	M	X	(LEAD)				
Darling Ingredients, Int. 2077-00044 Darling Ingredients, Int. 429 Armador St.	1	1/1	0/0		1/1	NS						
	2	0/0	1/1		0/0	CC						
	3	0/0	0/1		0/1	IL	X	dissolved sulfides				Corrective Action
	4	1/1	0/1		0/1	CC						
<b>Inspection &amp; Sampling Headings</b>												
Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)												
Actual - Actual number of inspections and/or sampling events												
Spill - Number of inspections and /or sampling events in response to spills or emergencies												
<b>Compliance Status Keys</b>												
SF-Significant Non-Compliance: Federal Limits						M - Minor noncompliance						
SL-Significant Non-Compliance: Local Limits						CC - Consistent Compliance						
IF - Inconsistent Compliance: Fed Limits						TS - On a Time Schedule						
IL - Inconsistent Compliance: Local Limits						U - Unknown						
						NS - No Sampling Scheduled						

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NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				ENFORCEMENT ACTION TAKEN						
		Sch This Year	Actual	Spill	Sch Next Year	Compliance Status	Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other
2013-00008 Evergood Sausage Co. 1389 Underwood Ave.	1	0/1	0/0		0/1	NS						
	2	0/0	0/1		0/0	CC						
	3			Re-classified in July 2018; no longer SIU								
	4											
2075-01139 Golden Gate Soy Products 1265 Griffith Street	1	0/1	0/0		1/1	NS						
	2	0/0	0/0		0/0	NS						
	3	0/0	1/0		0/1	NS						
	4	1/1	1/1	X*	0/0	SL	X-pH	X-tamper		Pending		*illegal dumping
8062-00933 Kaiser Permanente SF Medical Center, Geary Campus 2425 Geary Blvd.	1	0/0	0/0		0/0	NS						
	2	1/1	0/1		1/1	CC						
	3	0/0	0/0		0/0	NS						
	4	0/1	1/1		0/1	CC						
<b>Inspection &amp; Sampling Headings</b> Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW) Actual - Actual number of inspections and/or sampling events Spill - Number of inspections and /or sampling events in response to spills or emergencies  <b>Compliance Status Keys</b> SF-Significant Non-Compliance: Federal Limits SL-Significant Non-Compliance: Local Limits IF - Inconsistent Compliance: Fed Limits IL - Inconsistent Compliance: Local Limits  M - Minor noncompliance CC - Consistent Compliance TS - On a Time Schedule U - Unknown NS - No Sampling Scheduled												

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NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN															
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other										
8062-00937 St. Francis Memorial Hospital 900 Hyde St.	1	0/0	0/0			NS																
	2	0/1	0/1			CC																
	3	0/0	1/0			NS																
	4	1/1	0/1			CC																
8062-00943 S.F. General Hospital 1001 Potrero Ave.	1	1/1	1/0		1/1	IL	pH															
	2	0/0	0/1		0/0	IL																
	3	1/1	0/0		0/1	CC																
	4	0/0	0/1		0/0	NS																
4000/02008 San Francisco Presidio Water Treatment Plant 1773 Gibson Road	1	0/1	0/0		0/1	NS																
	2	0/0	0/0		0/0	NS																
	3	0/0	0/0		0/0	NS																
	4	1/1	1/1		1/1	CC																
<p><b>Inspection &amp; Sampling Headings</b>                      Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)                      Actual - Actual number of inspections and/or sampling events                      Spill - Number of inspections and /or sampling events in response to spills or emergencies</p> <p><b>Compliance Status Keys</b></p> <table style="width: 100%;"> <tr> <td>SF-Significant Non-Compliance: Federal Limits</td> <td>M - Minor noncompliance</td> </tr> <tr> <td>SL-Significant Non-Compliance: Local Limits</td> <td>CC - Consistent Compliance</td> </tr> <tr> <td>IF - Inconsistent Compliance: Fed Limits</td> <td>TS - On a Time Schedule</td> </tr> <tr> <td>IL - Inconsistent Compliance: Local Limits</td> <td>U - Unknown</td> </tr> <tr> <td></td> <td>NS - No Sampling Scheduled</td> </tr> </table>													SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance	SL-Significant Non-Compliance: Local Limits	CC - Consistent Compliance	IF - Inconsistent Compliance: Fed Limits	TS - On a Time Schedule	IL - Inconsistent Compliance: Local Limits	U - Unknown		NS - No Sampling Scheduled
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NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				ENFORCEMENT ACTION TAKEN																
		Sch This Year	Actual	Spill	Sch Next Year	Compliance Status	Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other										
8221-00934 UCSF - Main Campus 400-700 Parnassus Ave.	1	1/1	1/0		1/1	NS																
	2	0/0	0/1		0/0	CC																
	3	1/1	0/0		1/1	NS																
	4	0/0	0/1		0/0	CC																
8221-02205 UCSF-Mission Bay Campus 600 16th St.	1	1/1	1/1		1/1	IL/ CC	pH					resample CC										
	2	0/0	0/0		0/0	NS																
	3	1/1	0/1		0/1	CC																
	4	0/0	0/0		0/0	NS																
8062-00935 UCSF-Mt. Zion Campus 1600 Divisadero St.	1	1/1	1/1		1/1	CC																
	2	0/0	0/0		0/0	NS																
	3	1/1	0/1		1/1	CC																
	4	0/0	0/1		0/0	NS																
<p><b>Inspection &amp; Sampling Headings</b>                      Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)                      Actual - Actual number of inspections and/or sampling events                      Spill - Number of inspections and /or sampling events in response to spills or emergencies</p> <p><b>Compliance Status Keys</b></p> <table style="width: 100%;"> <tr> <td>SF-Significant Non-Compliance: Federal Limits</td> <td>M - Minor noncompliance</td> </tr> <tr> <td>SL-Significant Non-Compliance: Local Limits</td> <td>CC - Consistent Compliance</td> </tr> <tr> <td>IF - Inconsistent Compliance: Fed Limits</td> <td>TS - On a Time Schedule</td> </tr> <tr> <td>IL - Inconsistent Compliance: Local Limits</td> <td>U - Unknown</td> </tr> <tr> <td></td> <td>NS - No Sampling Scheduled</td> </tr> </table>													SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance	SL-Significant Non-Compliance: Local Limits	CC - Consistent Compliance	IF - Inconsistent Compliance: Fed Limits	TS - On a Time Schedule	IL - Inconsistent Compliance: Local Limits	U - Unknown		NS - No Sampling Scheduled
SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance																					
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**NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS**

INDUSTRIAL USER SIC CODE - DISCH. NO. NAME & ADDRESS	QTR	INSPECTION / SAMPLING				Compliance Status	ENFORCEMENT ACTION TAKEN															
		Sch This Year	Actual	Spill	Sch Next Year		Warning Notice	Violation Notice	Admin. Order	Civil Action	Criminal Action	Other										
8062-00940 US Dept. of Veterans Affaris Medical Center 4150 Clement St.	1	0/0	0/0		0/0	NS																
	2	0/1	1/1		0/1	CC																
	3	1/0	0/1		1/0	CC																
	4	0/1	0/0		0/1	NS																
<p><b>Inspection &amp; Sampling Headings</b>                      Sch - Number of planned inspections and/or sampling events (All sampling performed by POTW)                      Actual - Actual number of inspections and/or sampling events                      Spill - Number of inspections and /or sampling events in response to spills or emergencies</p> <p><b>Compliance Status Keys</b></p> <table style="width: 100%;"> <tr> <td>SF-Significant Non-Compliance: Federal Limits</td> <td>M - Minor noncompliance</td> </tr> <tr> <td>SL-Significant Non-Compliance: Local Limits</td> <td>CC - Consistent Compliance</td> </tr> <tr> <td>IF - Inconsistent Compliance: Fed Limits</td> <td>TS - On a Time Schedule</td> </tr> <tr> <td>IL - Inconsistent Compliance: Local Limits</td> <td>U - Unknown</td> </tr> <tr> <td></td> <td>NS - No Sampling Scheduled</td> </tr> </table>													SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance	SL-Significant Non-Compliance: Local Limits	CC - Consistent Compliance	IF - Inconsistent Compliance: Fed Limits	TS - On a Time Schedule	IL - Inconsistent Compliance: Local Limits	U - Unknown		NS - No Sampling Scheduled
SF-Significant Non-Compliance: Federal Limits	M - Minor noncompliance																					
SL-Significant Non-Compliance: Local Limits	CC - Consistent Compliance																					
IF - Inconsistent Compliance: Fed Limits	TS - On a Time Schedule																					
IL - Inconsistent Compliance: Local Limits	U - Unknown																					
	NS - No Sampling Scheduled																					

**7.2 Updated List and Compliance Activities for CIUs and SIUs**

- Also was sampled in the third-quarter for oil and grease analysis. The average observed value exceeded the local limit value. The IU has not been resampled; a more appropriate sampling location is being investigated by staff.
- Bay Area Linen was inspected in June and issued a permit in July. The facility has not yet been sampled, as sampling locations are being determined for this IU.
- Golden Gate Soy Products, was sampled once in 2018. The sampling event occurred in the fourth-quarter of 2018.

- SF General was out of compliance in the first quarter of 2018 for pH. The facility could not be re-sampled until the third-quarter due to the construction activity in this area and inaccessibility to the sampling location.
- SF Presidio Water Treatment Plant was not sampled twice a year as scheduled. A sampling event occurred in the fourth-quarter of 2018.

### 7.3 July-December Semi-annual Data

SIUs in noncompliance with the applicable limits, during the July – December reporting period and the previous two quarters are listed in Tables below (as are the enforcement actions WWE/CSD took in response).

During the third quarter of the reporting period the following SIUs were in noncompliance with local limits:

- *AlSCO- Linen and Uniform Rental Services*
- *Darling Ingredients, Inc.*

During the fourth quarter of the reporting period the following SIUs were in noncompliance with local limits:

- *California Pacific Medical Center, Pacific Campus*
- *Golden Gate Soy Products, Inc.*

**TABLES 7.3 – July-December Semi-annual SIU 2018 Compliance Tables**  
**2018 Semi-annual SIU Compliance Status Report**  
 2nd Reporting Period  
 July through December

Industrial Category : 7213 - Commercial linen laundry service											
Industrial User Name and Address	Compliance Status last 4Q (1)				Sample Insp Date of Violation	Sample by POTW/IU/ other	Flow (2)	Samples in Violation			Date of, and comments on follow-up, corrective, or enforcement action taken
	cur	pr1	pr2	pr3				Parameter	Reported Value	Discharge Limit	
ALSCO 1001-16th Street San Francisco, CA 94107  (Non-categorical SIU)	IL	IL	NS	CC	09/18/18	POTW	D	O&G(T)		300 mg/L	Warning notice sent to IU 10/16/2018  Response letter from IU received 11/1/2018 IU stated; large returns of products that contained high amount of oil and grease from customer's dirty linens were washed.  No resampling; request IU to install new sampling port outside facility.
					09/19/18			O&G(T)	628 mg/L	300 mg/L	
					09/20/18			O&G(T)	316 mg/L	300 mg/L	
								O&G(T)	434 mg/L	300 mg/L	
(1) Compliance Status Key						(2) Flow Key (gpd), or actual flow					
SF - Significant violator; Federal limits				CC - Consistent compliance				A. 0 - 9,999			
SL - Significant violator; Local limits				* - On a time schedule				B. 10,000 - 29,999			
IF - Inconsistent compliance; Federal limits				U - Unknown				C. 30,000 - 49,999			
IL - Inconsistent compliance; Local limits				NS - Not scheduled to be sampled				D. 50,000 - 99,999			
								E. 100,000+			

**2018 Semi-annual SIU Compliance Status Report**  
 2nd Reporting Period  
 July through December

Industrial Category : 8062 - General Medical and Surgical Hospitals											
Industrial User Name and Address	Compliance Status last 4Q (1)				Sample Insp Date of Violation	Sample by POTW/IU/ other	Flow (2)	Samples in Violation			Date of, and comments on follow-up, corrective, or enforcement action taken
	cur	pr1	pr2	pr3				Parameter	Reported Value	Discharge Limit	
California Pacific Medical Center - Pacific Campus 2333 Buchanan St San Francisco, CA 94115  (Non-categorical SIU)	IL	NS	CC	IL	10/05/18	POTW	C	Pb	80.800	1.50	SITE E - Lead violation - Warning Notice is used • Resample 12/4/18 - ND - IN COMPLIANCE • Resample 12/5/18 - ND - IN COMPLIANCE • Resample 12/6/18 - ND - IN COMPLIANCE • Resample 12/7/18 - ND - IN COMPLIANCE • Resample 12/14/18 - ND - IN COMPLIANCE
(1) Compliance Status Key						(2) Flow Key (gpd), or actual flow					
SF - Significant violator; Federal limits				CC - Consistent compliance				A. 0 - 9,999			
SL - Significant violator; Local limits				* - On a time schedule				B. 10,000 - 29,999			
IF - Inconsistent compliance; Federal limits				U - Unknown				C. 30,000 - 49,999			
IL - Inconsistent compliance; Local limits				NS - Not scheduled to be sampled				D. 50,000 - 99,999			
								E. 100,000+			

Pretreatment Program Annual Report – January 1, 2018 to December 31, 2018

**2018 Semi-annual SIU Compliance Status Report**  
2nd Reporting Period  
July through December

Industrial Category : 2077 - Rendering Plant												
Industrial User Name and Address	Compliance Status last 4Q (1)				Sample Insp Date of Violation	Sample by POTW/IU/ other	Flow (2)	Samples in Violation			Date of, and comments on follow-up, corrective, or enforcement action taken	
	cur	pr1	pr2	pr3				Parameter	Reported Value	Discharge Limit		
Darling Ingredients 429 A mador Street San Francisco, CA 94124  (Non-categorical SIU)	CC	IL	CC	NS	08/30/18 08/31/18	IU & POTW POTW & IU		dissolved sulfides	0.95*	1.16	0.5 mg/L	09/18/18 - Email Warning Notice 09/19/18 - Partial fulfillment of WN -5-day rep  Resampling by IU: 10/4/18 = 0.11 mg/L - IU in compliance 10/5/18 = 0.48 mg/L - IU in compliance  10/5/18 - SPFUC lab report completed confirm 8/31/18 violation; 8/30 - no violation *SPFUC lab result for 8/30/18 = 0.13 mg/L  10/11/18 - Dropped off Warning letter SPFUC laboratory results confirmation  10/30/18 - email indicating all corrective actions completed from written warning
									(mg/L)			
(1) Compliance Status Key						(2) Flow Key (gpd), or actual flow						
SF - Significant violator; Federal limits				CC - Consistent compliance		A. 0 - 9,999						
SL - Significant violator; Local limits				* - On a time schedule		B. 10,000 - 29,999						
IF - Inconsistent compliance; Federal limits				U - Unknown		C. 30,000 - 49,999						
IL - Inconsistent compliance; Local limits				NS - Not scheduled to be sampled		D. 50,000 - 99,999						
						E. 100,000+						

**2018 Semi-annual SIU Compliance Status Report**  
2nd Reporting Period  
July through December

Industrial Category : 2075 Tofu/Soy processing												
Industrial User Name and Address	Compliance Status last 4Q (1)				Sample Insp Date of Violation	Sample by POTW/IU/ other	Flow (2)	Samples in Violation			Date of, and comments on follow-up, corrective, or enforcement action taken	
	cur	pr1	pr2	pr3				Parameter	Reported Value	Discharge Limit		
Golden Gate Soy Products 1265 Griffith Street San Francisco, CA 94124  (Non-categorical SIU)	SL	NS	NS	NS	10/16/18	POTW	A	pH	5.64 pH	6.0 min mg/L; 3.5 max mg/L	warning notice sent to IU 11/26/2018 for pH violations  NOV letter sent to IU 10/18/2018 for tampering of sampler Response email for both received 10/19/2018  Resample for pH: 10/17 = 6.3 su Resample for pH: 10/19 = 6.4 su Resample for pH: 10/23 = 7.3 su IU in compliance for pH  Video received of dumping-called IU that day gave a verbal warning  12/14/18: Working with IU consultant for AO PENDING	
					10/18/18				5.41 pH			
(1) Compliance Status Key						(2) Flow Key (gpd), or actual flow						
SF - Significant violator; Federal limits				CC - Consistent compliance		A. 0 - 9,999						
SL - Significant violator; Local limits				* - On a time schedule		B. 10,000 - 29,999						
IF - Inconsistent compliance; Federal limits				U - Unknown		C. 30,000 - 49,999						
IL - Inconsistent compliance; Local limits				NS - Not scheduled to be sampled		D. 50,000 - 99,999						
						E. 100,000+						

## **8 BASELINE MONITORING REPORTS UPDATE**

Since the last annual report no CIUs were added to the pretreatment program, so there are no Baseline Monitoring Reports updates.

## **9 PRETREATMENT PROGRAM CHANGES**

### **9.1 Sewer Use Ordinance**

The Sewer Use Ordinance is in its final draft and is in the City Attorney's office for approval.

### **9.2 Local Limits**

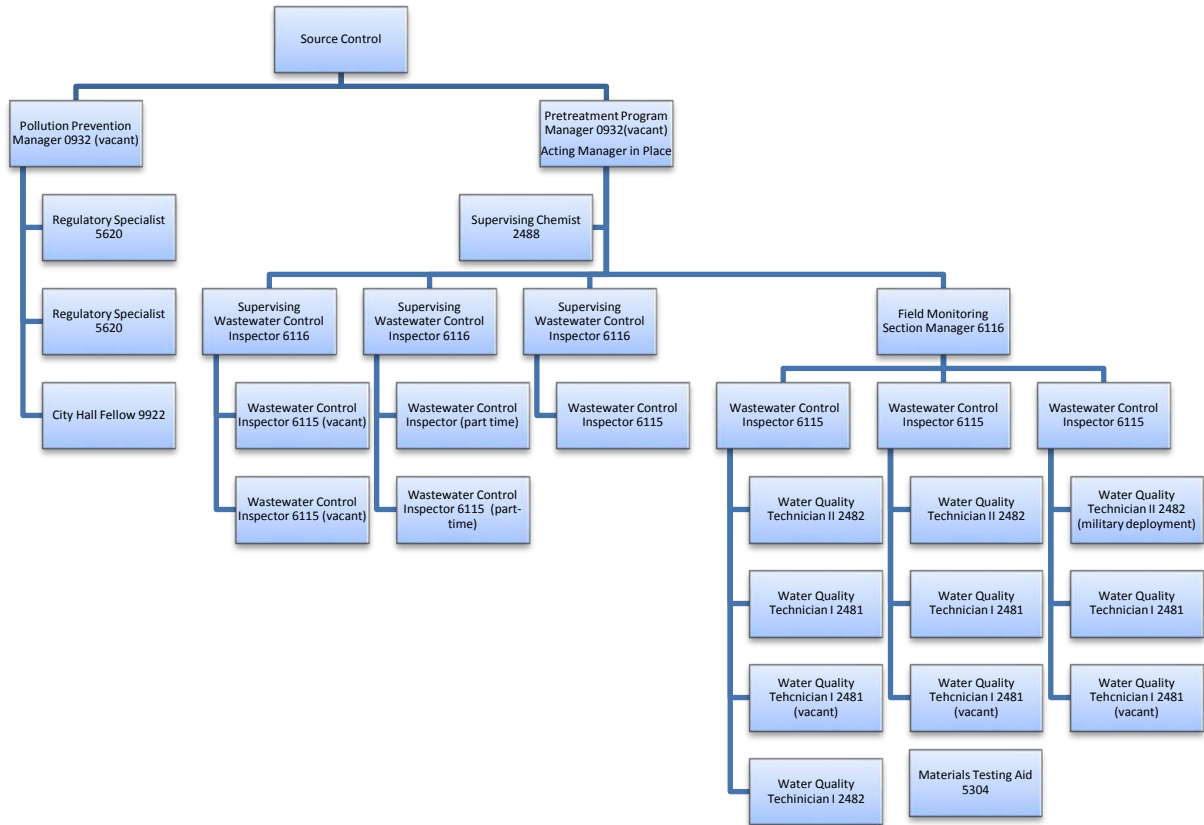
In 2018, the City and County of San Francisco, (CCSF), commenced a local limits study. CCSF will be finalizing the study by March, 2019. The detailed report will be submitted to the California Regional Water Quality Control Board, San Francisco, upon its final completion.

### **9.3 Pretreatment Program Organizational Chart**

The Pretreatment Program is conducted by the Source Control section of WWE/CSD. The organizational chart for WWE/CSD is displayed in Figure 2. In August 2018, the Pretreatment Manager retired from the City and County of San Francisco, (CCSF). The position is currently being filled with pretreatment staff as the "Acting Manager", until the position is permanently filled.

**FIGURE 2 – Organizational Chart**

**Wastewater Enterprise / Collection System Division (WWE/CSD)  
Source Control (Pretreatment Program)**



Classification:

- 2481
- 2482
- 5304
- 2488
- 5620
- 6115
- 6116
- 9922

Title:

- Water Quality Technician I
- Water Quality Technician II
- Materials Testing Aid
- Supervising Chemist
- Regulatory Specialist
- Wastewater Control Inspector
- Supervising Wastewater Inspector
- City Hall Fellow

**10 PRETREATMENT PROGRAM BUDGET**

The funds for the Pretreatment Program are derived from the sewer service charges levied against non-residential dischargers. The sewer service charge rates are established by the Board of Supervisors of the City in accordance with state and federal regulations. The Source Control budget for fiscal year 2017-18 is summarized in Table 10, and includes costs associated with the pre-treatment program as well as other source control activities.

**TABLE 10 – Source Control Program Budget**

**TABLE 10**

**SOURCE CONTROL BUDGET**

<b>ITEM</b>	<b>FY 2017-18</b>
Salaries	\$ 3,864,740
Fringe Benefits	\$ 1,645,626
Employee Field Expense	\$ 1,867
Maintenance Services-Equipment	\$ 46,000
Rents & Leases-Buildings & Structures	\$ 345,888
Other Current Expenses	\$ 251,740
Building & Construction Supplies	\$ 20,000
Equipment Maintenance Supplies	\$ 152,966
Field Monitoring & Laboratory Supplies	\$ 124,090
Safety	\$ 19,000
Other Materials & Supplies	\$ 98,474
Equipment Purchase	\$ 33,559
Services by Other Depts.	\$ 1,393,351
<b>TOTAL</b>	<b>\$ 7,997,301</b>

**11 PUBLIC PARTICIPATION SUMMARY**

Figure 3 displays our Notice of Noncompliance list of SIUs that were found to be in significant noncompliance with applicable pretreatment requirements during 2018. This notice will be published in the *San Francisco Chronicle*.

**FIGURE 3 – Notice of Noncompliance**

CITY AND COUNTY OF SAN FRANCISCO  
PUBLIC UTILITIES COMMISSION

NOTICE OF NONCOMPLIANCE

With Pretreatment Requirements for discharges to the sewerage system

Under the United States Environmental Protection Agency (EPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)), the Public Utilities Commission, Wastewater Enterprise, Collection System Division, is required to publish annually a list of industrial users which, during the calendar year, were in significant noncompliance with applicable pretreatment requirements. For the calendar year 2018, the relevant industrial users are listed below.

<b>Industrial User/Discharger</b>	<b>Authority</b>	<b>Current Status</b>
Golden Gate Soy Products, Inc	Article 4.1 – Sewer Use Ordinance	The Industrial User in the 4-Q tampered with sampling equipment and was issued a Warning Notice (WN). During the sampling event, the IU violated the pH limit and was issued another WN. Subsequently, there were two illegal dumped waste product into a nearby catch basin (11/9/18 and 11/13/18). Further enforcement actions are being taken by CCSF.

## **12 BIOSOLIDS STORAGE AND DISPOSAL PRACTICES**

Total biosolids production for 2018 was approximately 68,800 wet tons, approximately half of which was recycled through beneficial use at the landfill (alternative daily cover, ADC), and 16.7 % recycled as biofertilizer. Exact tonnage figures are available in the SFPUC Wastewater Enterprise (February 19) EPA Annual Biosolids Report.

Alternative daily cover (ADC) is achieved by mixing biosolids with green waste and using the mixture as an operations layer in landfill liner construction and slope stabilization. Use of this material in landfill construction is a beneficial use considered to be recycling/landfill diversion by the State of California.

Landfill disposal of biosolids (as ADC) occurred at Vasco Landfill, (Republic Services; Livermore, CA) and Potrero Landfill, (Portrero Hill Landfill; Suisun City, CA), licensed municipal solid waste landfill facilities.

During 2018 the City continued land application of its dewatered Class B biosolids through its contractors, Synagro, Inc. Land application occurred year-round in 2018. Exact figures are available in the (February 19) EPA Annual Biosolids Report.

Approximately 16.7% of the biosolids were sent to Lystek, an organic materials recovery firm. The biosolids are transformed to a liquefied fertilizer product.

In 2018 backwash filter sludge from Harry Tracy Water Treatment Plant (San Bruno, CA) was accepted for dewatering and disposal at Oceanside WPCP. WWE/CSD performed the following role:

- Evaluation of the chemical characteristics of the sludge, determining what, if any, impact it would have on plant operations or regulatory compliance; and
- Collection of volume and pollutant concentration data to calculate sewer service charges for the sludge disposal.

Fees collected for sludge treatment and disposal revert to SFPUC Water Pollution Control Division (WPCD) to defray the costs involved in this program.

Other exotic sludges were accepted for treatment at either of San Francisco's two wastewater treatment plants (e.g., brown grease skid waste). Their identity, volume, and chemical characteristics are reported separately in the (February 19) EPA Annual Biosolids Report.

### **13 OTHER POLLUTANT REDUCTION ACTIVITIES**

The City submits a separate Annual Pollution Prevention Report that describes details of programs implemented to reduce pollutants from nondomestic sources.

### **14 OTHER SUBJECTS**

#### **14.1 Batch Discharge Program**

WWE/CSD works with contractors and property owners/managers engaged in episodic discharges of wastewater resulting from construction dewatering, groundwater dewatering, well water testing, and any other periodic discharge of wastewater into the sewage system. WWE/CSD's role is to perform the following functions:

- Review the Batch Discharge permit application for completeness;
- Review the sampling results of all analytical tests to ensure compliance with the discharge standards;
- Ensure that appropriate pretreatment is in place;
- Review the proposed discharge location to ensure that the sewage system can hydraulically handle the proposed discharge;
- Provide contractors and property owners/managers with a permit to discharge the wastewater;
- Collect information on the discharge volume and all additional sampling requirements;
- Prepare sewer service billing charges and maintain file reports.

In April 2018, the Batch Discharge permit was updated to include the conformance with the Maher Ordinance. If the batch discharge site is located in a Maher zone, the permittee is required to perform additional testing of the wastewater for hazardous substances. This requirement aligns with Article 22A of the SF Health Code.

#### **14.2 Spill and Illegal Discharge Investigations**

WWE/CSD investigates a wide variety of complaints from citizens through the 311 system and referrals from other regulatory agencies regarding situations that involves the discharge of industrial, residential and/or hazardous wastes to the City's sewage system. Common complaints include allegations of illegal dumping into storm drains, catch basins, and street gutters, spills and leaks of hazardous or toxic substances leading to storm drains or catch basins, excessive water wasting resulting in runoff into the catch basin, improper management of construction site debris, restaurant related clean up activities on the street and sidewalk and sewer odors. WWE/CSD's response may include a site inspection, sampling, public outreach, odor monitoring with a gas detector, and enforcement.

**15 PERMIT COMPLIANCE SYSTEM (PCS) DATA ENTRY FORM**

**Discharger Name:** CITY & COUNTY OF SAN FRANCISCO

<u>Name of Wastewater Treatment Plant</u>	<u>NPDES Permit Number</u>
Oceanside Water Pollution Control Plant (OSP)	CA0037681
Southeast Water Pollution Control Plant (SEP)	CA0037664

**SUMMARY**

<u>Description</u>	<u>(PCS Code)</u>	<u>Number</u>
Reporting Period Start Date	(PSSD)	01/01/18
Reporting Period End Date	(PSED)	12/31/18
SIUs in SNC that are on a Pretreatment Compliance Schedule:	(SSNC)	1
Notices of Violation and Administrative Orders Issued against SIUs:	(FENF)	9 (WN - 8) (NOV -1)
Civil & Criminal Judicial Actions against SIUs	(JUDI)	0
SIUs with Significant Noncompliance Published	(SVPU)	1
SIUs from which Penalties have been collected	(IUPN)	0