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July 26, 2011

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California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive #200  
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Attention: Wendy Wyels, Senior Water Quality Control Engineer

**SUBJECT: Pretreatment Program Semi Annual Report for January – June, 2011**

**Board of Directors**  
Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

In accordance with Sacramento Regional County Sanitation District NPDES Permit No.CA0077682, the subject report is submitted.

If you have any questions concerning this report, please contact me at (916) 875-6554.

Sincerely,

Glen Del Sarto  
Environmental Program Manager

- Stan Dean  
*District Engineer*
- Ruben Robles  
*Director of Operations*
- Prabhakar Somavarapu  
*Director of Policy & Planning*
- Karen Stoyanowski  
*Director of Internal Services*
- Joseph Maestretti  
*Chief Financial Officer*
- Claudia Goss  
*Public Affairs Manager*

cc:

Keith Silva, U.S. Environmental Protection Agency  
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**PRETREATMENT PROGRAM  
SEMI-ANNUAL REPORT  
JANUARY - JUNE 2011**

WASTEWATER SOURCE CONTROL SECTION  
SACRAMENTO REGIONAL COUNTY SANITATION DISTRICT  
PRETREATMENT PROGRAM

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## **SECTION 1 PROGRAM CHANGES, DEVELOPMENTS, AND UPDATES**

The Sacramento Regional County Sanitation District received a new NPDES permit, effective in 2011. The new permit requires submittal of a semi-annual significant industrial user compliance report by July 31, 2011. The new permit eliminated the requirement for quarterly pretreatment reports, the last of which was submitted January, 2011 (covering the period October – December 2010). This semi-annual report is formatted to include all reporting requirements as specified in the new NPDES permit (Attachment E, X.D.5.b., page E-26)

Following is a summary and description of significant changes, developments, and updates to the SRCSD pretreatment program that occurred during January – June, 2011.

### **Pretreatment Program Streamlining**

#### **Federal Pretreatment Program Streamlining Rule -**

The U.S. EPA promulgated the Streamlining for General Pretreatment Regulations for Existing and New Sources of Pollution Rule (Rule), Federal Register/ Vol. 70, No. 198 in 2005 to allow local Control Authorities greater flexibility in applying Pretreatment Regulations. The Rule contains some voluntary provisions that allow for significant, though discretionary, reductions in reporting, sampling, and inspection requirements for industries discharging to the POTW. This creates opportunities for administrative simplification and cost savings for industries and the local Control Authority.

In addition to all required changes, two voluntary parts of the Rule have been selected for implementation: Part A – Sampling for Pollutants not Present and Part K – Oversight of Categorical Industrial Users. The reason for implementing these parts of the Rule is to increase Wastewater Source Control Section (WSCS) efficiency by applying an appropriate level of oversight to users that pose a minimal threat to SRCSD and contributing agencies. Implementation of these parts took place January 1, 2011 coinciding with permit renewal of all permitted industrial users. In preparation for implementation, WSCS performed extensive review of the rules, required policy changes, possible impacts and risk mitigation, required document changes (including permit and Sewer Use Ordinance), as well as internal and external outreach.

This semi-annual report includes identification of users reclassified based on implementation of the identified streamlining parts. To date, no users have requested streamlining under Part A – Sampling for Pollutants not Present.

#### **Reclassification of Categorical Users -**

Due to the application of Part K – Oversight of Categorical Users: seven Categorical Industrial Users (CIU) were reclassified to Middle Tier Categorical Industrial User (MTCIU), and one CIU was reclassified to Non Significant Categorical Industrial User (NSCIU).

The following categorical users were reclassified effective January 1, 2011:

<b>Business Name</b>	<b>New Classification</b>
Sierra Chemical Co.	417 – NSCU
Composite Engineering	433 – MTCU
Ellis & Ellis Signs	433 – MTCU
R-Squared Circuits	433 – MTCU
Sacramento Window Specialties	433 – MTCU
Teledyne MEC	433 – MTCU
Weidner Architectural Signage, Inc.	433 – MTCU
American Concrete Washouts	437 – MTCU

Reclassification of Significant Users to Non Significant or Class II Users -

In 2010, WSCS performed an extensive review of all users classified under the program as Non Categorical Significant Users. This action was prompted by WSCS evaluation of Federal streamlining initiative and the possibility of further streamlining the overall program by reclassifying Significant Users to Non Significant (Class II) status. After extensive review of wastewater characteristics, discharge practices, pretreatment controls, compliance history, and potential adverse impacts to the treatment plant, it was determined that a number of users could be reclassified as Class II users without any increased risk to SRCSD or the Sacramento Regional Wastewater Treatment Plant (SRWTP). Although these Class II users no longer fall under the Federal Pretreatment Program, they remain subject to a wastewater discharge permit and associated control and oversight.

In accordance with the requirements of 403.3(v)(3), WSCS has reclassified the users listed below, effective January 1, 2011, from Non Categorical Significant Users to Non Significant or Class II Users.

<b>Business Name</b>	<b>New Classification</b>
American Linen	Non Significant or Class II
Ameripride Services	Non Significant or Class II
Angelica	Non Significant or Class II
Aramark	Non Significant or Class II
Cintas	Non Significant or Class II
Coca Cola Bottling Co.	Non Significant or Class II
Culligan	Non Significant or Class II
DS Waters of America, Inc.	Non Significant or Class II
G&K Services	Non Significant or Class II
Gekkeikan	Non Significant or Class II
H.P. Hood, L.L.C.	Non Significant or Class II
Mission Linen	Non Significant or Class II
Nor-Cal Beverage	Non Significant or Class II
Pacific Adhesives	Non Significant or Class II
Pepsi-Cola	Non Significant or Class II
Purolator Advanced Filtration	Non Significant or Class II
Seven-Up	Non Significant or Class II
Shasta Linen	Non Significant or Class II
Vitafreze Frozen Confections	Non Significant or Class II

### Maximum Allowable Headworks Loading (MAHL)/Local Limit Review

Under the Federal pretreatment program SRCSD/SRWTP is required to develop and enforce technically based "local limits" or demonstrate limits are not needed. It is a requirement to continually assess the need for local limits and typically perform a formal evaluation with submittal to the State and EPA on a five year cycle or concurrent with any significant changes in the characteristics of the influent or changes in the NPDES permit.

The last formal local limit analysis conducted by SRCSD consisted of a series of six reports submitted to the regulatory agencies starting January 2004 and concluding in September 2005. In January 2011, the State issued SRCSD a revised NPDES permit. Given that 5 years has elapsed since the last official submittal and the new NPDES permit contains numerous changes and pollutants not addressed in previous submittals, a new, formal local limit evaluation and report is needed. WSCS has initiated a MAHL/Local Limit analysis. The main milestones for this project are 1) December 2011 for completion of the MAHL portion of the analysis, and 2) June 2012 for completion of the Local Limit designation and development portion. WSCS will provide an update and report findings in subsequent pretreatment program reports.

### Significant Industrial User Changes (Categorical and Non-categorical)

The following table lists changes that occurred in the significant user program during the reporting period (not including changes described above).

<b>Industry Name</b>	<b>Permit Terminated</b>	<b>Permit Issued</b>	<b>Remarks</b>
University of Davis Medical Center	12/31/2010		IU no longer meets criteria for 40 CFR 423. Reclassified as Non-Significant Industrial User (Class II)
Capitol Steel Products	3/1/2011		IU converted process to zero discharge. Reclassified as Non-Significant Industrial User (Class II)
Pacific Powder Coating Inc.	5/1/2011		IU converted process to zero discharge. Reclassified as Non-Significant Industrial User (Class II)

## **SECTION 2 SIGNIFICANT CATEGORICAL INDUSTRIAL USERS**

The following presents a listing of all significant categorical industrial users permitted in the program during the reporting period.

### Listing of Significant Categorical Industrial Users

<b>NO.</b>	<b>Class</b>	<b>INDUSTRY NAME</b>	<b>STREET ADDRESS</b>	<b>CITY</b>	<b>ZIP</b>
<b>40 CFR 414</b>					
1	SCIU	Georgia Pacific	10399 East Stockton Blvd	Elk Grove	95624
2	SCIU	Procter & Gamble	8201 Fruitridge Rd	Sacramento	95813
<b>40 CFR 417</b>					
1	SCIU	CMA of Sacramento	9269 Survey Road	Elk Grove	95624
<b>40 CFR 418</b>					
1	SCIU	Agrium U.S., Inc.	3961 Channel Drive	W. Sacramento	95691
<b>40 CFR 423</b>					
1	SCIU	Carson Cogeneration Project	8580 Laguna Station Rd	Elk Grove	95624
2	SCIU	Sacramento Cogeneration Authority	5000 83 <sup>rd</sup> Street	Sacramento	95826
3	SCIU	Sacramento Power Authority	3215 47 <sup>th</sup> Avenue	Sacramento	95824
<b>40 CFR 430</b>					
1	SCIU	Huhtamaki Food Service	8450 Gerber Rd	Sacramento	95828
<b>40 CFR 433</b>					
1	SCIU	Aerojet General	Aerojet Rd & Hwy 50	Rancho Cordova	95742
2	SCIU	Alta Plating	8290 Alpine Avenue	Sacramento	95826
3	MTCIU	Composite Engineering	5381 Raley Boulevard	Sacramento	95838
4	SCIU	Contractor's Wardrobe	8460 Rovana Circle	Sacramento	95828
5	MTCIU	Ellis & Ellis	1111 Joellis Way	Sacramento	95815
6	SCIU	Folsom Prison	P.O. Box W	Represa	95671
7	SCIU	Form and Fusion	11261-A Trade Center Dr	Rancho Cordova	95742
8	SCIU	Microform Precision, LLC	1312 Striker Ave, Ste 101	Sacramento	95834
9	SCIU	Northrop Grumman Mission Systems	5441 Luce Avenue	McClellan	95652
10	MTCIU	R Squared Circuits	120 Blue Ravine Rd Ste 1	Folsom	95630
11	SCIU	Radiator Specialties	8441 Specialty Cir	Sacramento	95829
12	MTCIU	Sacramento Windows	1449 Blair Ave	Sacramento	95822
13	MTCIU	Teledyne	11361 Sunrise Park Dr	Rancho Cordova	95742
14	MTCIU	Weidner Architectural Signage	4517 Franklin Blvd	Sacramento	95820
15	SCIU	Woodmack Products Inc.	11430 White Rock Rd	Rancho Cordova	95742
<b>40 CFR 437</b>					
1	MTCIU	American Concrete Washouts	8620 Antelope North Road	Antelope	95843
2	SCIU	Elk Grove Waste Management	7451 Reese Road	Sacramento	95828
<b>40 CFR 439</b>					
1	SCIU	Ampac	Aerojet Rd & Hwy 50	Rancho Cordova	95742
<b>40 CFR 465</b>					
1	SCIU	Silgan Can Co.	6200 Franklin Blvd	Sacramento	95824
<b>40 CFR 469</b>					
1	SCIU	Defense Microelectronics Activity	4234 54th St, Bldg 620	McClellan	95652
<b>28</b>		<b>Total</b>			

## Enforcement Activities

Enforcement activities are summarized in the following table. Enforcement actions initiated in previous periods, which remain pending, as well as actions closed during the current reporting period are listed.

### Enforcement Actions for Significant Categorical Industrial Users

Violation				Enforcement		
Company Name	Date of Violation	Parameter/Remarks	Standard Violated (Federal/Local)	Action	Date Issued	Date Closed
<b>40 CFR 414</b>						
Procter & Gamble	10/7/10	exceeded monthly average limit for bis(2-ethylhexyl)phthalate	Federal	NOV	1/20/11	4/21/11
<b>40 CFR 417 - no enforcement this reporting period</b>						
<b>40 CFR 418 - no enforcement this reporting period</b>						
<b>40 CFR 423 - no enforcement this reporting period</b>						
Sacramento Cogen Authority	2/16/11	exceeded pH limit	Federal	NOV	2/22/11	2/22/11
	4/30/11	exceeded pH limit	Federal	NOV	5/9/11	5/9/11
<b>40 CFR 430 - no enforcement this reporting period</b>						
<b>40 CFR 433</b>						
Composite Engineering	4/21/11	Incomplete report	Federal	WRN	5/20/11	7/20/11
R-Squared Circuits	12/15/10	improper pH monitoring to demonstrate compliance	NA	NOV	12/15/10	3/17/11
Woodmack Products Inc.	4/28/08 – 5/12/10	exceeded TTO limit	Federal	NOV	11/19/10	6/27/11
<b>40 CFR 437 - no enforcement this reporting period</b>						
<b>40 CFR 439 - no enforcement this reporting period</b>						
<b>40 CFR 465 - no enforcement this reporting period</b>						
<b>40 CFR 469 - no enforcement this reporting period</b>						
<b>KEY</b>						
<b>Enforcement Actions</b>					<b>Other:</b>	
ACL - Administrative Civil Liability CMO - Compliance Order CND - Cease & Desist CNO - Consent Order COR - Correction Notice			ENO- Enforcement Order NOV - Notice of Violation SCO - Show Cause Order WRN - Warning Letter		NA – not applicable P - Pending	

### SECTION 3 SIGNIFICANT NON CATEGORICAL INDUSTRIAL USERS

#### Listing of Significant Non-Categorical Industrial Users

NO.	INDUSTRY NAME	SITE ADDRESS	CITY	ZIP
<b>Beverage</b>				
1	Nestle Waters North America	8670 Younger Creek Road	Sacramento	95828
<b>Food Processing</b>				
1	Blue Diamond	1802 C St	Sacramento	95814
2	Campbell Soup	6200 Franklin Blvd	Sacramento	95824
3	Kikkoman Foods	1000 Glenn Dr	Folsom	95630
<b>Water Treatment Plants</b>				
1	City of W. Sac., Bryte Bend WTP	400 N. Harbor Blvd.	W. Sacramento	95605
2	Sacramento County Water Agency	3847 Branch Center Rd	Sacramento	95827
<b>Others</b>				
1	State of California Central Plant	625 Q Street	Sacramento	95814
7	<b>Total</b>			

#### Enforcement Actions

Enforcement activities are summarized in the following table. Enforcement actions initiated in previous quarters, which remain pending as well as actions closed during the current quarter are listed.

#### Enforcement Actions for Significant Non-Categorical Industrial Users

Violation				Enforcement		
Company Name	Date of Violation	Parameter/Remarks	Standard Violated (Federal/Local)	Action	Date Issued	Date Closed
<b>Beverage - no enforcement during this reporting period</b>						
<b>Food</b>						
Campbell Soup	7/2/10 – 8/26/10	exceeded pH limit	Federal	CNO	8/27/10	5/25/11
	6/1/11	exceeded pH limit	Federal	NOV	6/8/11	P
	6/30/11	exceeded pH limit	Federal	NOV	7/5/11	P
Kikkoman Foods	1/17/11	exceeded pH limit	Federal	NOV	1/20/11	5/6/11
	6/28/11	exceeded pH limit	Federal	NOV	7/5/11	7/5/11
<b>Water Plants</b>						
Sacramento County Water Agency	1/12/11	exceeded pH limit	Federal	NOV	1/12/11	5/13/11
<b>Other - no enforcement during this reporting period</b>						
<b>KEY</b>						
<b>Enforcement Actions</b>				<b>Other:</b>		
ACL - Administrative Civil Liability CMO - Compliance Order C&D - Cease & Desist CNO - Consent Order COR - Correction Notice			ENO- Enforcement Order NOV - Notice of Violation SCO - Show Cause Order WRN - Warning Letter		NA – not applicable P - Pending	