Pretreatment Compliance Audit

Draft Summary Report

Discharger:	Monterey Regional Water Pollution Control Agency NPDES Permit No. CA0048551 Monterey County
Location:	14811 Del Monte Blvd., Marina, CA 93933
Contact:	Gary Weier, Source Control Supervisor
Audit Dates:	August 29 – 30, 2017
Audited By:	Danny O'Connell, PG Environmental Stephen Clark, PG Environmental

Attachments

Attachment A	ICIS Water Enforcement National Database (WENDB) Data Entry Worksheet
Attachment B	Reportable Noncompliance (RNC) Data Worksheet
Attachment C	Mission Linen Supply #300 Discharge Permit
Attachment C	Nondomestic Discharger Information: Mission Linen Supply #300
Attachment D	Mission Linen Supply #2100 Discharge Permit
Attachment E	Ocean Mist Discharge Permit
Attachment F	Legal Authority Review Checklist
Attachment G	Sewer Use Ordinance
Attachment X	[Other program document(s) needed to support findings]

Commented [WA1]: ICIS/WENDB and RNC worksheets do not need to go to the POTW as part of the report, they are simply included as info for the RB. We'd like to remove these from the attachments list and just include in the delivery package to RBs, if RBs are okay with this.

Commented [CD2]: Here are two different examples to follow: if the only document you have need to reference to support findings is the IU Permit, use the first option.
If you have sample data, an inspection report, permit application, enforcement correspondence, etc… that is necessary to support one of your findings,,..then use the 2nd option.
Name each document as C-1, C-2, They don't have to be listed individually here, but we would need to provide each with the draft report.

Commented [CD3]: Would not need these attachments for a PCI.

I. Audit Summary

Upon arrival, EPA contractors Danny O'Connell and Stephen Clark (Audit Team, Auditors, EPA Audit Team, PG Audit Team), met with the Agency's Source Control Supervisor, Gary Weier. The Audit Team discussed the purpose and format of the audit and interviewed the Source Control Supervisor about the Agency's pretreatment program. The Audit Team also evaluated the Agency's procedures, enforcement response plan, and legal authority.

Commented [CD4]: Audit would be replaced with Inspection or Inspector for PCIs,. We identify multiple references for our team here, any of which can be used in the body of the report. For site visits, it's imperative to distinguish between the City inspector and our staff.,

Commented [CD5]: Remove for PCI – "The Audit Team also evaluated the Agency's procedures."

As part of the audit, the Audit Team reviewed the following files:

- Mission Linen Supply #0300 (non-categorical Significant Industrial User [SIU])
- Mission Linen Supply #2100 (non-categorical SIU)
- Ocean Mist Farms (non-categorical SIU)
- Colonial Silver (categorical industrial user [CIU] subject to 40 CFR Part 433)

The Audit Team conducted inspections at the following SIUs:

- Mission Linen Supply #0300 (non-categorical SIU)
- Mission Linen Supply #2100 (non-categorical SIU)
- Ocean Mist Farms (non-categorical SIU)

The last review of the Agency's pretreatment program was an inspection performed on May 8, 2013.

II. Program Description

The Agency is comprised of twelve member entities: Boronda County Sanitation District, Castroville Community Services District, County of Monterey, City of Del Rey Oaks, City of Monterey, City of Pacific Grove, City of Salinas, City of Sand City, City of Seaside, Marina Coast Water District, Moss Landing County Sanitation District, and the U.S. Army, which is an ex-officio member. Each member entity operates its collection system but Agency staff implements the industrial pretreatment program for the members. The Agency's industrial pretreatment program is managed by the Source Control Supervisor and includes two Source Control Inspectors.

The Monterey Regional Water Pollution Control Agency (MRWPCA or Agency) operates the MRWPCA Regional Wastewater Treatment Plant (RWTP), which serves a population of approximately 250,000. The RWTP has a design capacity of 29.6 million gallons per day (MDG) and provides primary, secondary and tertiary treatment. During the peak growing season (March through November) the RWTP provides tertiary treated effluent to crop growers in the northern Salinas Valley. During the winter months, the RWTP discharges secondarily treated wastewater to the Pacific Ocean. The Source Control Supervisor stated the average influent flow to the RWTP has been decreasing due to water conservation efforts and a few other factors, At the time of the audit, the RWTP treated an average influent flow of approximately 16 MGD.

At the time of the audit, the Agency was in the planning phase of treatment plant modifications. Refer to Part V.A.1 of this report for more information.

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III. Industrial User (IU) Characterization		
IUs currently identified by the Control Authority (CA)	**IU Type**	
4	**Discharging Significant Industrial Users**	
	4	**Discharging Non-Categorical SIUs (as defined by the CA)**
	0	**Categorical Industrial Users (CIUs)**
	0	**Middle Tier CIUs**
0	**Zero-Discharging CIUs**	
0	**Non-significant CIU (NSCIU)**	
10	**Other Regulated IUs (e.g. permitted IUs)** **Describe:** The Agency permits 10 non-significant IUs that include 3 groundwater remediation sites, 3 hospitals, an aquarium, a storm water runoff discharge, and 2 industrial dischargers. The Agency requires these IUs to perform self-monitoring at varying frequencies. Groundwater sites are required to perform self-monitoring sampling once per quarter. Hospitals are not required to self-monitor.	
7	**Waste Haulers** **Describe:** The Agency permits waste hauler companies that discharge to its dedicated points at the RWTP. Refer to Part V.G of this report for additional information.	

IV. Findings Summary Table		
Part V Section Reference – Finding	**Requirement(s)**	**Recommendation(s)**
C.1.a – The Agency had not issued a control mechanism for the Salinas Industrial Wastewater System.	1	
C.1.b – Permit transmittal dates were prior to the permit's approval date.		1
C.1.c – An expired permit for Mission Linen #0300 was missing from the Agency's records.		2
C.1.d – The Agency was not requiring SIUs to resubmit complete permit application packages when renewing permits.		3
D.1.a – The following terms were not defined in the SUO: "Authorized (or duly authorized) representative" and "best management practices (BMPs)".	2	
D.1.b –The Agency's SUO does not include required permit elements including: effluent limits, best management practices, self-monitoring requirements, reporting and notification requirements, and statement of applicable civil and criminal penalties.	3	
D.1.c –The Agency's SUO does not include the following reporting and notification requirements: notifications of	4	

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changes affecting the potential for a slug discharge, compliance schedule progress report, upset notification, and bypass notification.		
D.1.d –The Agency's SUO sometimes includes references to 40 CFR 403 rather than including the full text of a definition or requirement.		4
D.1.e –The Agency's SUO does not appear to enable the Agency to seek or assess criminal penalties.		5
F.2 – The Agency was not fully completing chain-of-custody forms	5	6
F.5.a – The pH buffer solutions at Mission Linen Supply #2100 were expired	6	
F.5.b – Self-monitoring samples were received by the lab at a temperature above 6°C.	7	
H.2 – The Agency's liquid waste hauler information bulletin did not explicitly outline the Agency's pre-approval call-in process for brine loads as a requirement		7
H.3 – The Agency should evaluate the pH equalization tank capacity at Mission Linen Supply #0300	8	

V. Evaluation

The Audit Team discussed the following topics regarding the Agency's pretreatment program with the Agency representatives. The Audit Team also reviewed SIU files to assess the retention and maintenance of required program documents and to generally evaluate overall program implementation. The following sections describe program deficiencies and areas of concern identified during the audit process along with requirements, recommendations, and associated references to 40 CFR Part 403.

A. Control Authority (CA) Pretreatment Program Modification

1. When was the last program modification? Did the CA notify the EPA of program modifications? (40 CFR 403.18)

The Agency has not significantly modified its pretreatment program since the last inspection (May 2013). The Agency last modified its local limits in 1993 and its sewer use ordinance (SUO) in 2008. The Agency is in the process of making substantial program modifications due to upcoming treatment plant modifications. Specifically, according to the Agency's 2017 draft local limits sampling plan (developed by Larry Walker & Associates on behalf of the Agency), the Agency is "partnering with the Monterey Peninsula Water Management District (MPWMD) to develop the Pure Water Monterey Groundwater Replenishment Project, which will deliver 3,500 acre-feet per year of purified recycled water to replenish the Seaside Groundwater Basin. As part of this project, MRWPCA will begin accepting [treated] wastewater from four new sources including: (1) agricultural wash water from the City of Salinas, (2) stormwater runoff from southern Salinas, (3) stormwater, urban, and agricultural runoff from the Reclamation Ditch, and (4) surface and agricultural tile drain waters from the Blanco

Drain. Tertiary effluent will be conveyed to the [Advanced Water Purification Facility (AWPF)], which will be located adjacent to the [Regional Wastewater Treatment Plant], for treatment through ozone pretreatment, low-pressure membrane filtration, reverse osmosis, advanced oxidation, and product water stabilization. The AWPF is expected to be operational in late 2018."

The following are the forthcoming substantial pretreatment program modifications:

- Development of new local limits;
- Revisions to the sewer use ordinance;
- Expansion of the scope of regulated industrial users; and
- Potential new Agency members.

At the time of the audit, the Agency had completed the Salinas Source Water Industrial Wastewater Diversion Project, which allows the Agency to divert wastewater from the City of Salinas, California (hereinafter, Salinas) Industrial Wastewater System (IWS) to the headworks of the RWTP via the Agency's Salinas Pump Station. Wastewater is routed from the IWS prior to entry to the Salinas Industrial Wastewater Treatment Facility (IWTF). The source identified above as the "agricultural wash water from the City of Salinas" is the wastewater that flows from the Salinas IWS to the Salinas IWTF. Refer to Finding C.1.a below for more information.

B. IU Characterization

1. Describe the CA's procedure for identifying and locating IUs that might be subject to the pretreatment program. Has the CA identified and located all applicable IUs (non-categorical SIUs, CIUs, NSCIUs, etc.)? (40 CFR 403.8(f)(2)(i))

The Source Control Supervisor explained the Agency uses the processes provided in the 2016 Annual Pretreatment Program Report, which are incorporated below for reference:

"Each year, the MRWPCA Source Control Division conducts a search and check for new or existing businesses that need to be regulated under Federal Categorical or Non-Categorical Significant Industrial User status. This is accomplished through the following methods:

1. A review of the new phone book upon receipt and the on-line telephone information sites each calendar year. This is a check to determine if any new facilities have located in the MRWPCA service area and also to determine if any existing businesses have expanded their production/service to include a categorical process or significant process water discharge;
2. Businesses seeking a new connection or expansion permit from the MRWPCA Customer Service Department are either directed to contact the Source Control Division or the Customer Service Department notifies the Source Control Division concerning these new connections. A list of categorical industries and other industrial/commercial activities of interest was given to the Customer Service Representatives as a reference to the types of processes that need to be inspected or checked (see enclosed list);
3. The Source Control Division is included in the building permit sign-off procedure at all member entity Building Inspection Departments. This procedure includes the member entity contacting the MRWPCA directly for approval of plans prior to issuing a building permit to a company or customer. This process allows the Source Control Division to identify potential or actual categorical/significant industries at a very early stage and then take the appropriate regulatory

action;

4. The Source Control Division has implemented a field-checking program that includes "patrolling" the industrial/commercial areas of the MRWPCA service area as time permits to identify new or undiscovered facilities. If any are found, a formal inspection is scheduled to determine if categorical or significant industrial user status exists;
5. The Source Control Division reviews water usage and discharge volumes to the sanitary sewer through billing reports generated by the MRWPCA Customer Service Department. Trigger Significant Industrial User discharge volumes can be identified and trended using this data."

The Agency's efforts as listed in the annual report appear to be adequate for locating and identifying SIUs subject to the pretreatment program.

2. Has the CA identified the character and volume of pollutants contributed to the publicly owned treatment works (POTW) by IUs subject to the pretreatment program?
(40 CFR 403.8(f)(2)(ii))

The Agency has a process for identifying the character and volume of pollutants contributed by IUs, as described in B.1. The Agency had not adequately characterized the wastewater contributed to the POTW by the Salinas IWS. Refer to Finding C.1.a, below, for more information.

3. Has the CA prepared and maintained a list of SIUs, as defined in 403.3(v)(1), along with the applicable SIU criteria? Does the list indicate whether the CA has made a determination that an SIU is a NSCIU, as defined in 403.3(v)(2), rather than an SIU? Have modifications to the list been submitted with annual reports?
(40 CFR 403.8(f)(6))

The Agency maintains a current list of SIUs, which it submits with the annual pretreatment program report. The list provided during the audit, which was dated August 1, 2017, specifies whether the SIU is permitted as a CIU, a NSCIU, or a non-categorical SIU, and includes other regulated industrial users. The Agency had not classified any nondomestic dischargers in the service area as CIUs or NSCIUs at the time of the audit. The last nondomestic discharger the Agency had classified and permitted as a CIU (Colonial Silver) ceased operations in August 2013.

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C. Control Mechanism Evaluation

1. Has the CA issued individual or general control mechanisms to all SIUs?
(40 CFR 403.8(f)(1)(iii))

All SIUs whose files were reviewed during the audit had been issued an individual permit and all permits were current. The Agency did not issue general permits at the time of the audit. Findings regarding the issuance of control mechanisms are provided below.

Finding C.1.a – The Agency had not issued a control mechanism for the Salinas Industrial Wastewater System.

The Agency completed the Salinas Source Water Industrial Wastewater Diversion Project, which allows the Agency to divert wastewater from the Salinas IWS to an Agency pump station that ultimately delivers the wastewater to the headworks of the RWTP. Wastewater is routed from the IWS prior to entry to the Salinas IWTF. At the time of the audit, the Agency had been routing wastewater to the RWTP at an approximate flow rate of 3 to 4 MGD for a duration of twelve hours per day (12 p.m. to 12 a.m.); therefore, the effective flow rate to the RWTP was approximately 1.5 to 2 MGD. According to the Source Control Supervisor, the Agency chose this twelve-hour period because this is the timeframe when the food processing facilities that discharge to the Salinas IWS are not typically discharging wastewater generated during clean in place operations (which may include residual acidic solutions and wastewater with varying pH levels). The Agency had been accepting wastewater from the Salinas IWS for approximately one year prior to the time of the audit.

The Agency monitors the pH, conductivity, and oxidation reduction potential of the diverted wastewater within a vault upstream of the Agency's pump station. If the wastewater is not within specified ranges for pH, conductivity, or oxidation reduction potential, the Agency returns the wastewater to the Salinas IWS. However, at the time of the audit, due to a pump that was out of service, the monitoring instrumentation had been inoperable for approximately two weeks. Additionally, the Audit Team observed that the alarm set points for pH, conductivity, and oxidation-reduction potential did not require immediate cease of flow from the Salinas IWS to the RWTP; therefore, the Audit team was unable to evaluate whether the Agency had the necessary mechanisms in place to adequately protect the RWTP from flows not within the specified ranges for the parameters noted above.

The Source Control Supervisor explained that the Agency is contracted by Salinas to perform compliance inspections of the approximately 26 IUs that discharge to the Salinas IWS. These inspections are focused on complying with the Salinas IWTF's Wastewater Discharge Requirements rather than the Agency's industrial pretreatment program requirements. The Audit Team did not see any documented evidence that this wastestream, a portion of which is diverted to the RWTP, had been properly characterized in comparison with Agency pretreatment program requirements. Regardless, a control mechanism was not in place to regulate these discharges to the RWTP.

Regulatory Requirements

40 CFR 403.8(f)(1)(iii) requires the Agency to "control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under 403.3(v), this control shall be achieved through individual permits or equivalent control mechanisms issued to each

such User."

40 CFR 403.3(v) states "*Significant Industrial User.* (1) Except as provided in paragraphs (v)(2) and (v)(3) of this section, the term Significant Industrial User means: (i) All Industrial Users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; and (ii) Any other Industrial User that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or is designated as such by the Control Authority on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement."

Requirement 1
The Agency is required to control the contribution of wastewater from the Salinas IWS to the POTW through an individual permit or equivalent control mechanism.

Finding C.1.b – Permit transmittal dates were prior to the permit's approval date.
The transmittal letter that accompanied the permit for Mission Linen Supply #0300 was dated one day before the permit's approval date, which was also the permit's effective date. Additionally, the working file lacked documentation indicating that the SIU received the permit before the previous permit expired. According to Agency staff the permit was issued via certified mail.

Regulatory Requirements
40 CFR 403.8(f)(1)(iii) requires the Agency to "control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under 403.3(v), this control shall be achieved through individual permits or equivalent control mechanisms issued to each such User."

Recommendation 1
The Agency should ensure that transmittal letters are dated on or after the permit's approval date. Additionally, the Agency should implement procedures to ensure that permits are received by the IU before the previous permit expires and maintain documentation indicating the IU has received the permit.

Finding C.1.c – An expired permit for Mission Linen #0300 was missing from the Agency's records.
The working file for Mission Linen Supply #0300 contained the current permit which became effective August 27, 2016, and was set to expire on August 27, 2019. The other permit in the file became effective on November 10, 2011, and expired on August 10, 2014. According to Agency representatives, a new permit was issued before the 2011-2014 permit expired, which covered a time period of 2013-2016. The permit that covered the period of 2013-2016 period was not available for review; Agency representatives stated the hard-copy permit was accidentally thrown out and the electronic file was overwritten.

Regulatory Requirements

Not Applicable (N/A).

Recommendation 2
The Agency should maintain unique electronic files for each issued permit.

Finding C.1.d – The Agency was not requiring SIUs to resubmit complete permit application packages when renewing permits.
The permit applications for Mission Linen #2100 and #0300 were dated 2008. The Source Control Supervisor explained that the Agency does not require SIUs to resubmit a complete permit application package when a permit is renewed.

Regulatory Requirements
N/A.

Recommendation 3
The Agency should require SIUs to resubmit a complete permit application package to ensure it has the most current information.

2. Do the applications for general control mechanism contain all of the following?
(40 CFR 403.8(f)(1)(iii)(A)(2))

a. **Contact info**
b. **Production processes**
c. **Types of wastes generated**
d. **Location for monitoring**
e. **Any request for waiver for pollutants not present per 40 CFR 403.12(e)(2)**

N/A. The Agency does not issue general control mechanisms.

3. Are general control mechanisms only issued for IUs where all of the following is true?
(40 CFR 403.8(f)(1)(iii)(A)(1))

a. **Involve same/substantially similar types of operations**
b. **Discharge the same type of waste**
c. **Same effluent limitations**
d. **Same or similar monitoring**
e. **There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations**

N/A. The Agency does not issue general control mechanisms.

4. Do both individual and general control mechanisms include the following, where applicable?
(40 CFR 403.8(f)(1)(iii)(B))

a. **Statement of duration (5 years max)**
b. **Statement of non-transferability**
c. **Applicable effluent limits (local limits, categorical standards, BMPs)**

d. **Self-monitoring requirements**
   - **Identification of pollutants to be monitored**
   - **Sampling frequency**
   - **Sampling locations/discharge points**
   - **Appropriate sample types**
   - **Reporting requirements**
   - **Record-keeping requirements**

e. **Statement of applicable civil and criminal penalties**
f. **Compliance schedules**
g. **Notice of slug loading or potential problems at POTW**
h. **Notification of spills, bypasses, upsets, etc.**
i. **Notification of significant change in discharge**
j. **24-hour notification of effluent violation**
k. **Submit resampling results within 30-days**
l. **Slug discharge control plan requirement, if required by POTW**
m. **Certification statements**
n. **Sampling/analysis requirements (Part 136 or alternative)**
o. **Reporting of additional sampling**
p. **90-day compliance report**

The permits reviewed during the audit included the above elements.

As a result of the 2013 inspection, the Agency was required to revise its permits to include the requirements at 40 CFR 403.12(g)(6), which state that if an industrial user monitors any regulated pollutant at the appropriate sampling location more frequently than required, the results of the monitoring must be reported. The permits reviewed during the audit included this requirement. Additionally, the Agency was required to modify the Sabor Farms permit to require that repeat sampling results be submitted within 30 days as required at 40 CFR 403.12(g)(2). The Audit Team observed that the Sabor Farms permit was modified to include this requirement. Further, the Agency was required to document the decision to allow time-proportional samples for Mission Linen Supply #2100, as required at 40 CFR 403.12(g)(3). The Audit Team observed the Agency had documented its decision to allow time-proportional samples.

D. Legal Authority

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1. Has the CA amended its pretreatment program to include the streamlining provisions?

EPA promulgated changes to the general pretreatment regulations on October 13, 2005, referred to as the "streamlining rule." According to the current version of the SUO (dated 2008), the Agency had adopted most but not all, of the required streamlining provisions.

As a component of the 2017 PCA, the Audit Team compared the SUO with the provisions of 40 CFR Part 403. The following deficiencies and inconsistencies were observed with the SUO:

Finding D.1.a – The following terms were not defined in the SUO: "Authorized (or duly authorized) representative" and "best management practices (BMPs)".

Regulatory Requirement

40 CFR 403.12(l) defines *Authorized* (or *duly authorized*) *representative* as, "A responsible corporate officer, if the Industrial User submitting the reports required by paragraphs (b), (d), and (e) of this section is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or

(ii) The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(2) By a general partner or proprietor if the Industrial User submitting the reports required by paragraphs (b), (d), and (e) of this section is a partnership, or sole proprietorship respectively.

(3) By a duly authorized representative of the individual designated in paragraph (l)(1) or (l)(2) of this section if:

(i) The authorization is made in writing by the individual described in paragraph (l)(1) or (l)(2);

(ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(iii) the written authorization is submitted to the Control Authority.

(4) If an authorization under paragraph (l)(3) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (l)(3) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by an authorized representative."

40 CFR 403.3(e) defines *BMP* as, "Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in 40 CFR 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plan site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage."

Requirement 2
The Agency is required to update its SUO to define "authorized (or duly authorized) representative" and "best management practices (BMPs)" consistent with 40 CFR 403.3.

Finding D.1.b –The Agency's SUO does not include required permit elements including: effluent limits, best management practices, self-monitoring requirements, reporting and notification requirements, and statement of applicable civil and criminal penalties.

Regulatory Requirement
According to 40 CFR 403.8(f)(1)(iii), the POTW's legal authority shall enable the POTW to "Control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements."
According to 40 CFR 403.8(f)(1)(iii)(B), "both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions:

(*1*) Statement of duration (in no case more than five years);

(*2*) Statement of non-transferability without, at a minimum, prior notification to the POTW and provision of a copy of the existing control mechanism to the new owner or operator;

(*3*) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(*4*) Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(*5*) Statement of applicable civil and criminal penalties for violation of Pretreatment Standards and requirements, and any applicable compliance schedule. Such schedules may not extend the compliance date beyond applicable federal deadlines;

(*6*) Requirements to control Slug Discharges, if determined by the POTW to be necessary."

Requirement 3
The Agency is required to update its SUO to grant the Agency the necessary legal authority to issue

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individual and general permits with all elements required by 40 CFR 403.8(f)(1)(iii)(B).

Finding D.1.c –The Agency's SUO does not include all required reporting and notification requirements.

The following required reporting and notification requirements were not included in the SUO per 40 CFR 403:

- Notifications of changes affecting the potential for a slug discharge [required streamlining provision [40 CFR 403.8(f)(2)(vi)];
- Compliance schedule progress report [403.12(c)]. Note: Section 4.05.3(j) of the SUO requires permit applications to include a compliance schedule progress report. While this application requirement would require unpermitted industrial users to provide a compliance schedule progress report, it will not necessarily require currently permitted industrial users to provide such a report.;
- Upset notification [40 CFR 403.16 (c)(3)]; and
- Bypass notification [40 CFR 403.17(c)].

Regulatory Requirement
According to 40 CFR 403.8(f)(1)(iv)(B), the POTW's legal authority shall enable the POTW to require the "submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements, including but not limited to the reports required in 403.12." Furthermore, as noted above, the regulatory requirements for upset and bypass can be found in 40 CFR 403.16 and 17, respectively.

Requirement 4
The Agency is required to update its SUO to grant the Agency the necessary legal authority to require the submission of all notices and self-monitoring reports from IUs as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements.

Finding D.1.d –The Agency's SUO is inconsistent with respect to incorporation of specific language from 40 CFR Part 403. In multiple instances, the SUO simply incorporates by reference to 40 CFR Part 403, rather than including the full text of a definition or requirement.

The Audit Team noted that the Agency's SUO cites 40 CFR Part 403 rather than providing the full text of the citation in the SUO. The following are examples, not a comprehensive list, of such occurrences:

- The Agency's definition of "new source" provided in the SUO includes the text in 40 CFR 403.3(m)(1) but does not include the provisions in 40 CFR 403.3(m)(1)(i)–(iii). The definition references these provisions. Specifically, Section 1.03 of the SUO defines the term "New Source" as the following: "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 which will be applicable to such source if such Standards are thereafter promulgated in accordance with

that section. This term includes provisions established pursuant to 40 CFR 403.3 [emphasis added]."

- The Agency's SUO references the specific content for baseline monitoring reports. Specifically, Section 4.04.2 of the SUO states "Baseline Monitoring Report - Industrial Users subject to Federal Categorical Pretreatment standards that are currently discharging to or are scheduled to discharge to the Agency's Treatment Works shall submit to the Agency a Baseline Monitoring Report that meets all requirements and time guidelines set forth in 40 CFR 403.12(b) [emphasis added] and any other such requirements as deemed appropriate by the Agency."

Recommendation 4
It is recommended that the Agency incorporate the full text of definitions and requirements into its SUO rather than incorporate citations that reference 40 CFR Part 403.

Finding D.1.e –The Agency's SUO does not appear to enable the Agency to seek or assess criminal penalties.

The Audit Team observed that the Agency's SUO does not explicitly mention criminal penalties. Also, Sections 7.05 and 7.06 of the Agency's SUO appear to subject criminal actions to civil penalties. Specifically, Section 7.05 of the Agency's SUO states:

> "Civil Liabilities and Penalties – Any person who intentionally or negligently [emphasis added] violates any provision of this Ordinance, requirements, or conditions set forth in a permit duly issued, or who discharges wastewater which causes pollution, or violates any cease and desist order, prohibition, effluent limitation, national standard of performance, pretreatment or toxicity standard, including non-discharge pretreatment standards, shall be liable to injunctive relief for non-compliance imposed by the Agency against which the violation occurs. Said civil liability [emphasis added] may be in a sum of not to exceed six thousand dollars ($6,000.00) a day for each violation in which such violation occurs.
>
> The Agency may petition the Superior Court to impose, assess and recover such sums. In determining such amount the court shall take into consideration all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the nature and persistence of the violation, the length of time over which the violation occurs, and corrective action, if any."

Additionally, Section 7.06 of the Agency's SUO states:

> "Falsifying of Information – Any person who knowingly makes [emphasis added] any false statements, representation record, report, plan or other document filed with the Agency, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this Ordinance, is hereby declared to be in violation of this Ordinance, and subject to the civil liabilities [emphasis added] imposed under Section 7.05 of this Ordinance."

Regulatory Requirement
According to 40 CFR 403.8(f)(1)(vi), the POTW's legal authority shall enable the POTW to "Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement.

All POTWs shall be able to seek injunctive relief for noncompliance by Industrial Users with Pretreatment Standards and Requirements. All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of $1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements."

Recommendation 5
It is recommended that the Agency evaluate its legal authority to ensure that is has the ability to seek or assess criminal penalties per 40 CFR 403.8(f)(1)(vi).

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

The Agency, formed under a joint exercise of powers agreement, is comprised of twelve member entities that discharge to the RWTP. Each member entity operates its collection system but Agency staff implements the industrial pretreatment program for the members.

3. What is the control authority's definition of SNC?
(40 CFR 403.8(f)(2)(viii))

The Agency uses the federal definition of SNC at 40 CFR 403.8(f)(2)(viii).

E. Application of Pretreatment Standards and Requirements

1. Does the CA apply all applicable pretreatment standards?
(40 CFR 403.8(f)(1)(ii) and 403.8(5))

The Agency had not issued an individual control mechanism for the Salinas IWS. Refer to Finding C.1.a, above, for more information.

2. Has the CA evaluated the need for SIUs to develop slug discharge control plans?
(40 CFR 403.8(f)(2)(vi))

The Agency's Source Control Supervisor stated that three of the four SIUs have been required to develop SDCPs, and all 3 currently have one in place. The Agency evaluates each slug discharge control plan during annual inspections of SIUs and documents its evaluation on the annual inspection report form.

F. Compliance Monitoring

1. Has the CA inspected and independently sampled each SIU at least once a year? Middle tier CIUs at least once every two years? Sample once during term of CIU control mechanism if CIU sampling waived for pollutants not present?
(40 CFR 403.8(f)(2)(v), 403.12(e)(2), 403.12(e)(2))

Based on the SIU files reviewed, the Agency has been conducting inspections and sampling at least once per year.

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2. Has the CA used proper sampling and analysis procedures (40 CFR Part 136) and inspection procedures? Were the procedures done with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions?
(40 CFR 403.8(f)(2)(v) and (vii), 40 CFR 403.12(g)(5))

In general, the Agency appears to be using proper sampling procedures and using 40 CFR Part 136 methods. However, the Agency was not fully completing chain-of-custody forms; refer to Finding F.2, below, for more information.

Finding F.2 – The Agency was not fully completing chain-of-custody forms.
The Agency had not been completing the "Relinquished By" field on the chain-of-custody forms used for compliance monitoring sample collection. The Agency representatives explained that the Agency stores compliance samples in the RWTP's laboratory refrigerator upon return from the field. The chain-of-custody is left with the samples but custody is not formally relinquished to a particular individual. A courier from the contract analytical laboratory is granted access to the laboratory to pick up the samples.

Regulatory Requirement
40 CFR 403.8(f)(2)(vii) states "Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions."

Requirement 5
The Agency is required to fully complete chain-of-custody forms to ensure that it produces evidence admissible in enforcement proceedings or in judicial actions.

Recommendation 6
It is recommended the Agency implement a formal process by which sample custody is relinquished by the sample collector to an individual at the RWTP's laboratory who will then be able to relinquish custody to the courier.

3. Has the CA kept records for three years including the following?
- **a. Period compliance reports and other reports/notices**
- **b. All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results**
- **c. BMP compliance documentation**
- **d. Other monitoring records**

(40 CFR 403.12(o))

Based on the files reviewed, the Agency maintains records for at least three years. The Source Control Supervisor stated that monitoring files are kept indefinitely.

4. Has the CA evaluated, at least once per year, whether NSCIUs continue to meet the criteria of an NSCIU?
(40 CFR 403.8(f)(2)(v)(b), 403.3(v)(2))

N/A. The Agency has not permitted nondomestic dischargers as NSCIUs nor has it adopted the

authority to do so.

5. Has the CA required, received, and analyzed reports and other notices from SIUs?

a. Self-monitoring reports
b. BMRs and 90-day compliance reports
c. Compliance schedules reports
d. Notice of slug loading or potential problems at POTW
e. Notification of spills, bypasses, upsets, etc.
f. Notification of significant change in discharge
g. 24-hour notification of effluent violation
h. Resampling results within 30-days
i. Other reports/notifications required by the CA

(40 CFR 403.8(f)(2)(iv))

Based on the files reviewed during the audit, the Agency has been requiring, receiving, and analyzing required reports. However, the following findings were identified regarding the analysis of required reports.

Finding F.5.a – The pH buffer solutions at Mission Linen Supply #2100 were expired.

During the site visit at Mission Linen Supply #2100 on August 30, 2017, the Audit Team observed that the pH calibration buffer solutions used for self-monitoring were expired. The facility performs a 2-point calibration with pH 7 and 10 buffer solutions; the pH 7 buffer solution expired on January 17, 2016 and the pH 10 buffer solution expired on December 5, 2014. The Agency performed an annual inspection at the facility on May 31, 2017; the inspection report does not indicate if the inspector verified the expiration dates of the pH buffer solutions.

Regulatory Requirement

Part F3.F of the Mission Linen Supply #2100 permit states "Standardization and cleaning of the pH probe(s) shall be performed a least weekly and recorded in a pH system maintenance logbook."

Requirement 6

The Agency is required to verify that Mission Linen Supply #2100 is properly standardizing its pH probe, a component of which is maintaining unexpired buffer solutions.

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Finding F.5.b – Self-monitoring samples were received by the lab at a temperature above 6°C.
Self-monitoring documentation for two SIUs (Mission Linen Supply #0300 and Mission Linen Supply #2100) indicated that self-monitoring samples were received by the laboratory at temperatures above 6°C. Specific observations are as follows:

1. For the self-monitoring sampling conducted by Mission Linen Supply #0300 on May 5, 2017, the sample (oil and grease) was collected at 13:00 and received by the laboratory at 13:38 at a temperature of 30.6°C. The sample was analyzed on May 13, 2017.
2. For the self-monitoring sampling conducted by Mission Linen Supply #2100 on July 12, 2017, the samples (volatile organic compounds [VOCs] and semivolatile organic compounds [SVOCs]) were collected at 6:00 and received by the laboratory at 10:54 at a temperature of 23.9°C. The samples were analyzed on July 19, 2017.

Regulatory Requirements
40 CFR 403.12(h) states, "The Control Authority must require appropriate reporting from those Industrial Users with Discharges that are not subject to categorical Pretreatment Standards. Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by the Control Authority) a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority...These reports must be based on sampling and analysis performed in the period covered by the report, and in accordance with the techniques described in part 136 of this chapter and amendments thereto."

40 CFR Part 136, Table II, requires oil and grease, VOC, and SVOC samples to be cooled to ≤6°C.

Requirement 7
The Agency is required to ensure that all SIUs sample and analyze self-monitoring samples in accordance with the techniques described in 40 CFR Part 136.

6. Have SIUs monitored to demonstrate continued compliance and re-sampled after violation(s)?
(40 CFR 403.12(g)(1) &(2))

According to the Agency's "limit violation" logs, there were two effluent limit violations from January 1, 2016, to the time of the audit. One of these violations (oil and grease) was identified by the Agency during compliance monitoring at Mission Linen Supply #0300. The Agency resampled within 30 days and found the discharge to be in compliance with permitted effluent limitations.

The second violation (a self-monitoring pH sample) occurred at Mission Linen Supply #2100 and was not reported to the Agency. A Source Control Inspector observed the violation on a pH chart during an inspection at the facility. The Agency issued Mission Linen Supply #2100 a Letter of Warning for failure to report the pH limit violation and for failing to record the violation in the facility's pH logbook. Because the Mission Linen Supply #2100 conducts continuous pH effluent monitoring, an additional sample was collected within 30 days.

7. Has the CA ensured CIUs report on all regulated pollutants at least once every 6 months?
(40 CFR 403.12(e)(1) & (g)(1))

N/A. The Agency had not classified or permitted nondomestic dischargers as CIUs at the time of the audit.

8. Has the CA ensured non-categorical SIUs self-monitor and report at least once every 6 months with a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority?
(40 CFR 403.12(h) & (g)(1))

Based on the files reviewed, the Agency was ensuring non-categorical SIUs self-monitor and report at least once every 6 months.

9. Has the CA required self-monitoring reports from CIUs to be signed and certified?
(40 CFR 403.12(b)(6), 403.12(l))

N/A. The Agency has not permitted any nondomestic dischargers as CIUs.

10. Has the CA received notification of hazardous waste discharges?
(40 CFR 403.12(j) & (p))

Based on the SIU files reviewed during the audit, no hazardous waste discharge notifications were received, nor was there an indication that such notifications should have been received. The Source Control Supervisor stated that discharges from the Agency's permitted SIUs do not qualify as hazardous waste.

G. Enforcement

1. Has the CA implemented its enforcement response plan (ERP)?
(40 CFR 403.8(f)(5))

Based on the SIU files reviewed, it appears the Agency has been implementing its approved ERP. The Agency's ERP, which was last updated in 2009, includes the minimum elements required by 40 CFR 403.8(f)(5).

2. Does the CA evaluate both numeric and narrative criteria for significant non-compliance (SNC) and annually publish a list of IUs in SNC?
(40 CFR 403.8(f)(2)(viii))

Yes. The Agency uses the federal definition of SNC.

2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.

According to the Source Control Supervisor, no SIUs were in SNC for 2016, nor have any been found to be in SNC for 2017, as of the date of this audit.

3. Has the CA developed IU compliance schedules?
(40 CFR 403.8(f)(1)(iv)(A))

Yes. The Agency issued a compliance schedule to Mission Linen Supply #2100 for pH effluent limitation violations. The compliance schedule was embedded within a Letter of Warning issued to the facility on August 9, 2017. The facility's response, received by the Agency on August 25, 2017, indicated the facility had completed the compliance schedule's corrective actions.

4. Has the CA ensured CIU compliance within 3 years of standards effective date (or less than 3 years where required by standard)?
(40 CFR 403.6(b))

N/A. The Agency has not classified or permitted nondomestic dischargers as CIUs at the time of the audit.

5. Has the CA ensured CIUs submit complete baseline monitoring reports and 90-day compliance reports within the required time frames?
(40 CFR 403.12(b) & (d))

N/A. The Agency has not classified or permitted nondomestic dischargers as CIUs at the time of the audit.

H. Additional Evaluations

Commented [CD7]: This section is intended to be a catch-all for misc. findings that don't fit well anywhere else in the template.

1. Colonial Silver Site Closure Documentation

The Audit Team evaluated documentation pertaining to the closure of the Colonial Silver facility, a former CIU (subject to the regulations at 40 CFR Part 433) that had ceased operations during August 2013. After the closure, the Agency made repeated attempts to contact the facility's owner regarding the status of the site closure but did not receive a response. According to correspondence dated February and April 2014, between the Agency and parties responsible for the site closure (Rutan Environmental Safety Services and Pacific Crest Engineering), the site closure and cleanup had been completed but the environmental site closure report and associated waste manifests had not been released since Colonial Silver was past due on payments. The correspondence stated that cleanup involved the removal of chemicals, waste, and contaminated concrete flooring from the premises and soil testing (laboratory results did not indicate contamination). Additionally, the sump and pump used to discharge to the sanitary sewer system were removed; the sump was filled in with concrete.

2. Liquid Waste Haulers

Finding H.2 – The Agency's liquid waste hauler information bulletin did not explicitly outline the Agency's pre-approval call-in process for brine loads as a requirement.
The Agency issues permits to liquid waste hauling companies that discharge to its designated discharge points at the RWTP. The Agency operates dedicated receiving stations for septic tank, chemical toilet, and restaurant interceptor waste at the RWTP. Septic tank and chemical toilet waste are routed to the RWTP's headworks whereas restaurant interceptor waste is routed to an anaerobic digester.

The Agency also receives brine at two dedicated locations: its brine pond and two modified sludge

drying beds. Since the brine pond has the ability to overflow to the RWTP's ocean outfall, the Agency only allows what it deems high-quality brine to be discharged to the brine pond. Lower quality brines are discharged to the modified drying beds. The Agency regulates the discharge of brine loads by implementing a pre-approval process, reserving the right to inspect and/or sample brine loads, and posting an attendant at the RWTP that verifies that the brine load is discharged to the proper location. The Source Control Supervisor explained that the pre-approval process requires waste haulers to call the Agency to obtain the Agency's approval before accepting a job requiring brine hauling; the Agency approves the load after it verifies the quality of the brine load the waste hauler will be collecting. Additionally, before accepting brine loads, trucks used to haul brine loads must be certified as clean either through steam cleaning/pressure washing or by being a dedicated truck. The Agency issues an information bulletin to liquid waste haulers that outlines specific requirements for brine loads. The Audit Team observed that the bulletin did not explicitly outline the pre-approval call-in procedures as a requirement.

Regulatory Requirement
40 CFR 403.5 (b)(8) prohibits any "trucked or hauled pollutants, except at discharge points designated by the POTW."

Recommendation 7
It is recommended that the Agency revise its liquid waste hauler information bulletin to identify the pre-approval call-in process as a requirement.

3. Mission Linen Supply #0300 Equalization Tank Capacity

Finding H.3 – The Agency should evaluate the pH equalization tank capacity at Mission Linen Supply #0300
During the inspection at Mission Linen Supply #0300, the Audit Team observed that the pretreatment system's 16,000-gallon equalization tank had approximately 4 inches of freeboard. The discharge pipe from the equalization tank to the mixing tank was located near the top of the tank, providing approximately 1 inch of operational capacity. The Audit Team observed the pipe to be completely submerged multiple times. Soap and debris were present on the lip of the tank. It appeared that any increase in wastewater volumes discharged to the pretreatment system or a significant rain event could cause a spill to occur from the top of the tank.

Regulatory Requirement
N/A.

Recommendation 8
It is recommended that the Agency evaluate the potential for a spill to occur from the equalization tank at Mission Linen Supply #0300.

Focus Topics

As a component of the audit, the Audit Team discussed the following focus topics with the Source Control Supervisor.

Commented [CD8]: Only list ones that are applicable to the POTW being audited/inspected. If they do not have a pharmaceutical take-back program, eliminate this paragraph. Only address the industrial laundry use (or awareness of the SDSI) if the POTW actually has an industrial laundry.

Pharmaceuticals Recovery
Community members can dispose of pharmaceuticals at disposal sites and participating pharmacies that offer take-back programs. The Agency advertises information regarding the disposal sites and take-back programs on its website, which includes an informational flyer. The flyer is also provided at community exhibits, RWTP tours, and on Earth911.com.

Dental Mercury
The Agency has not required dental facilities to implement mandatory mercury reduction methods; however, all dental facilities within the Agency's service area have voluntarily installed amalgam separators. The Agency's NPDES permit does not contain a numeric effluent limit for mercury.

Industrial Laundries
The industrial laundry located in the Agency's service area does not participate in the EPA's Safer Detergent Stewardship Initiative. It does not use detergents that contain nonylphenol ethoxylates (NPEs). More information regarding the laundry's pretreatment requirements can be found below in the site visit data sheet for Mission Linen Supply #2100.

Fats, Oils, and Grease (FOG) and Nonwoven Wipes
The Source Control Supervisor referred the Audit Team to the public outreach section of its 2016 Pretreatment Annual Report, which describes the Agency's outreach as follows:

- Facility tours, including inviting 5th and 6th grade classes and Girl Scout troops
- Community exhibits which include the California State University Monterey Bay Earth Fair and at the Monterey County Fair
- Social Media (the Agency uses Facebook and Twitter to share information, provide customer service, and conduct public outreach)
- Television, internet, and print ads

Potential Cleanups
According to the Source Control Supervisor, there are no potential cleanups requiring public funding.

Possible Criminal Violations
According to the Source Control Supervisor, there are no possible criminal violations.

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SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name of industry: Mission Linen Supply #2100

Address of industry: 315 Kern Street, Salinas, CA 93905

Date of visit: 8/30/2017 | Time of visit: 9:40 a.m.–11:30 a.m.

Name of inspector(s):
Juan Arreguin, Source Control Inspector, MRWPCA
Kevin Cunningham, Source Control Inspector, MRWPCA
Danny O'Connell, PG Environmental
Stephen Clark, PG Environmental

Provide the name(s) and title(s) of industry representative(s)

Name	Title	Phone/Email
Paul Harris	Plant Manager	831-424-1707
Randy Fernandez	Chief Engineer	831-424-1707

IU Permit Number: 0051 | Exp. Date: 8/26/2019 | IU Classification: non-categorical SIU

Please provide the following documentation:

1. Nature of operation: The facility is an industrial laundry and is classified under SIC Code 7218 (Industrial Launderers). The facility rents and launders industrial uniforms, bar mops, shop towels, and floor mats.

2. Number of employees	Approximately 40	Number of shifts:	1	Hours of operation:	5:00 a.m.– 4:00 p.m. (Monday through Friday)

3. Wastestream flow(s) discharged to the POTW: Process wastewater is generated from washers, boiler blowdown, and water softener regeneration.

Sanitary:	870 (gpd)	Process:	21,100 (gpd)	Combined:	21,970 (gpd)

4. Describe any current or planned significant changes in process or flow: The facility representatives indicated that there were no recent or planned changes at the facility that would affect the volume or nature of the wastewater discharged to the POTW.

Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): The facility's pretreatment system consists of a lint shaker, equalization tank, dissolved air flotation (DAF) unit, two sludge holding tanks, and a sludge press. Sulfuric acid is automatically added to the equalization tank for pH adjustment. Coagulant and polymer are added to the DAF unit to enhance the removal of contaminants. Water generated by the sludge press is returned to the equalization tank. The pretreatment chemicals (coagulant, polymer, and sulfuric acid), equalization tank, and DAF unit were surrounded by an approximately 18" tall concrete containment structure.

X	Continuous flow		Batch		Combined

Process area description (identify raw materials and processes used): The facility's delivery trucks drop off industrial uniforms, aprons, bar mops, shop towels, and floor mats at a sorting area. Afterwards, these items are washed, dried, and organized into customer orders, then delivered to the customer via truck. The items are washed in large washers of varying capacities with varying detergent combinations; bleach (sodium hypochlorite) and dye are added as needed.

7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): The facility stores various detergents, sodium hypochlorite, and dyes for the laundering process. The detergents and sodium hypochlorite were stored on secondary containment pallets. The dyes consist of small single use packs stored in 5-gallon buckets. The facility stores coagulant, polymer, and sulfuric acid for the pretreatment system; these chemicals were stored outside and were surrounded by an approximately 18" tall concrete containment

structure.			
Any floor drains?	Trench drains were observed in the washing process areas	Any spill control measures?	Spill Contingency Plan; secondary containment pallets and spill kits.
8. Are hazardous wastes drummed and labeled? Hazardous wastes observed during the inspection were drummed and labeled.			
9. Does the IU have hazardous waste manifests? Hazardous waste manifests are maintained on-site. The Chief Engineer maintains a logbook that documents waste pick-up dates and waste manifest identification numbers.			
10. Solid waste production and disposal: Lint removed by the shaker is disposed of in the garbage. Solids removed from the DAF unit are processed through a sludge press. Solids from the sludge press are hauled offsite for disposal.			
11. Description of sample location and methods: Composite and grab samples are collected at the overflow weir downstream of the DAF unit. Effluent flow and pH are monitored continuously.			
Notes:			
1. The facility diagram provided to the Audit Team did not reflect the configuration of the pretreatment system observed during the inspection. Specifically, the diagram did not depict the sludge press and did not accurately depict the coagulant storage area; the diagram depicted one coagulant tank whereas two 250-gallon totes were observed. 2. The facility performs a 2-point calibration of its pH meter once per week; calibration is documented in a logbook maintained on-site. The pH calibration buffer solutions were expired (the pH 7 buffer solution expired on January 17, 2016 and the pH 10 buffer solution expired on December 5, 2014). Refer to Finding E.5.a, above, for more information.			

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Mission Linen Supply #0300					
Address of industry: 435 W. Market Street, Salinas, CA 93901					
Date of visit: 8/30/2017	Time of visit: 12:30 p.m.–1:35 p.m.				
Name of inspector(s): Juan Arreguin, Source Control Inspector, MRWPCA Kevin Cunningham, Source Control Inspector, MRWPCA Danny O'Connell, PG Environmental Stephen Clark, PG Environmental					
Provide the name(s) and title(s) of industry representative(s)					
Name	**Title**	**Phone/Email**			
Joe Smith	Assistant Production Manager	831-424-1753			
IU Permit Number: 0050	Exp. Date: 8/27/2019	IU Classification: non-categorical SIU			
Please provide the following documentation:					
1. Nature of operation: The facility is a commercial laundry classified under SIC Code 7213 (Linen Supply Service). The facility rents and launders linens, towels, uniforms, and dust control items.					
2. Number of employees	Data not obtained during site visit	Number of shifts:	2	Hours of operation:	Monday through Friday: 5:00 a.m.–10:30 p.m. Sunday: 5:30 a.m.–1:30 p.m.
3. Wastestream flow(s) discharged to the POTW: Process wastewater is generated from washing machines, boiler blowdown, and water softener regeneration.					
Sanitary:	1,000 gpd	Process:	101,000 gpd	Combined:	102,000 gpd
4. Describe any current or planned significant changes in process or flow: The facility representative indicated that there were no recent or planned changes at the facility that would affect the volume or nature of the wastewater discharged to the POTW.					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): The facility uses a pH equalization system for treatment prior to discharging to the POTW. Process wastewater is pumped to a 16,000-gallon equalization tank which feeds a 1,200-gallon mixing tank where sulfuric acid is added for pH adjustment. The mixing tank discharges to a final tank equipped with a screen and weir box.					
X	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): The facility's delivery trucks drop off various linens, towels, commercial uniforms, and dust control items at a sorting area. Afterwards, these items are washed, dried, and organized into customer orders, then delivered to the customer via truck. The items are washed in large washers of varying capacities with varying detergent combinations; bleach (sodium hypochlorite) is added as needed.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Chemical storage areas were not inspected during the site visit.					
Any floor drains?	Yes	Any spill control measures?	Spill Contingency Plan; secondary containment pallets and spill kits.		
8. Are hazardous wastes drummed and labeled? N/A					
9. Does the IU have hazardous waste manifests? N/A					
10. Solid waste production and disposal: The facility uses a shaker to remove lint and other material from the					

waste stream prior to discharging to the equalization tank. Lint removed by the shaker is disposed of in the garbage.
11. Description of sample location and methods: Grab samples are collected at the weir box located after the screen. Flow and pH are monitored continuously. The pH probe is located upstream of the screen.
Notes:
1. The 16,000-gallon equalization tank had approximately 4 inches of freeboard. The discharge pipe from the equalization tank to the mixing tank was located near the top of the tank, providing approximately 1 inch of operational capacity. The pipe was observed to be completely submerged multiple times. While soap and debris were observed on the lip of the tank. While clear evidence of spillage from the tank was not observed, it appeared that an increase in wastewater volumes discharged to the pretreatment system or a significant rain event could cause a spill to occur from the top of the tank. 2. The Audit Team could not confirm if the system that delivers sulfuric acid to the mixing tank was operational at the time of the inspection. The system's pump appeared weathered and the nozzle at the end of the sulfuric acid discharge line appeared completely dry.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Ocean Mist Farms					
Address of industry: 10855 Ocean Mist Parkway, Castroville, CA 95012					
Date of visit: 8/30/2017		Time of visit: 1:44 p.m.–2: 35 p.m.			
Name of inspector(s): Juan Arreguin, Source Control Inspector, MRWPCA Kevin Cunningham, Source Control Inspector, MRWPCA Danny O'Connell, PG Environmental Stephen Clark, PG Environmental					
Provide the name(s) and title(s) of industry representative(s)					
Name		**Title**		**Phone/Email**	
Mark Reasons		Plant Manager		831-770-6080	
IU Permit Number: 195		Exp. Date: 12/30/2019		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility grows, receives, washes, cools, packs, and ships fresh produce and is classified under SIC Code 0723 (Crop Preparation Services, Except Cotton Ginning).					
2. Number of employees	143	Number of shifts:	3	Hours of operation:	Monday through Friday: 7:00 a.m.–2:00 a.m. Saturday: 6:00 a.m.–10:00 p.m.
3. Wastestream flow(s) discharged to the POTW: The facility generates wastewater from three primary operations: (1) Value Added—produce wash water treated with citric acid and sodium hypochlorite; (2) Cooling—ice is mixed with water treated with citric acid and sodium hypochlorite. Packages injected with the mixture are allowed to drain, leaving ice in the package; (3) Hydro-Vac system—cooling water that contacts vegetables is collected in drains underneath the Hydro-Vac system.					
Sanitary:	Not Reviewed (N/R)	Process:	64,658 (gpd)	Combined:	0
4. Describe any current or planned significant changes in process or flow: The Plant Manager was unsure how long the Value Added operations would remain at the facility. The amount of water used by the Value Added operations increased the facility's process wastewater to greater than 25,000 gallons per day. The Agency permitted the facility as an SIU in December 2016.					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): According to the Plant Manager, the facility operates a solids separator to separate solid material from produce processing and other debris from the process wastestream. The solids separator was not inspected during the site visit.					
X	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): Produce from growing fields is delivered in field totes via truck. The field totes are sorted and sent to various process areas depending on the type of produce. The Value Added operation washes and packages produce into pre-chopped portions. Bulk vegetables are cooled "wet" or "dry" depending on the type of produce. Bulk vegetables are packaged in cardboard boxes which are injected with ice and stored in a large refrigerated warehouse prior to loading them on trucks for delivery to customers.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Chemical storage areas were not inspected during the site visit.					

Any floor drains?	The chemical storage area was not inspected during the site visit.	Any spill control measures?	Spill Contingency Plan
8. Are hazardous wastes drummed and labeled? N/A			
9. Does the IU have hazardous waste manifests? N/A			
10. Solid waste production and disposal: A waste hauler periodically removes solids from the solids separator. Hauling records are maintained on-site and provided to the Agency.			
11. Description of sample location and methods: Grab samples for pH and oil and grease are collected at the sample box located downstream of the solids separator, near the fence on the southwest side of property.			
Notes:			
N/A			

Attachment A

ICIS WENDB DATA ENTRY WORKSHEET

PRETREATMENT COMPLIANCE INSPECTIONS/AUDITS

► TYPE OF COMPLIANCE MONITORING: PCA

► NAME OF PRETREATMENT PROGRAM: Monterey Regional Water Pollution Control Agency

► CONTROLLING AUTHORITY NPDES ID: CA0048551

START DATE OF INSPECTION ..... 8/29/2017 | ► END DATE OF INSPECTION 8/30/2017

LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]):
Danny O'Connell, PG Environmental, 720-789-8032, danny.oconnell@pgenv.com

ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]):
$tephen Clark, PG Environmental, 720-789-8046, $stephen.clark@pgenv.com

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
► SIUs* :	I.B.2.a	I.C.4.a	4
► SIUs Without Control Mechanism:	I.C.1.c	I.D.1 and II.A	0
► SIUs Not Inspected:	I.E.2.c	I.F.2.c	0
► SIUs Not Sampled:	I.E.2.b	I.F.2.b	0
► SIUs in SNC with Pretreatment Standards** :	I.F.3.a	I.F.3.a	0
► SIUs in SNC with Reporting Requirements:	I.F.3.a	I.F.3.a	0
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	0
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	0
Criminal Suits Filed Against SIUs:	I.F.1		0
CATEGORICAL INDUSTRIAL USERS (CIUs)			
► CIUs:		I.C.4.a	0
OTHER INFORMATION			
Pass-Through/Interference Indicator *(none, Yes, or No)*		I.G.6	None
DEFICIENCIES			
¢ontrol Mechanism Deficiencies *(No or Yes)*		I.D.1; II.A.4	No
Inadequacy of Sampling and Inspections *(No or Yes)*		II.C and Site Visit Sheets	No
Adequacy of Pretreatment Resources *(Yes or No)*		I.I	Yes

FOOTNOTES:
► denotes required information
* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."
** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

DATA ENTRY WORKSHEET COMPLETED BY:	Chuck Durham	DATE:	12/29/2017
TITLE:	EPA Contractor/PG Environmental	TELEPHONE NO.:	615-888-2928

Attachment B

RNC DATA ENTRY WORKSHEET

RNC DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name: Monterey Regional Water Pollution Control Agency			
NPDES number: CA0048551			
Date of inspection: 8/29-30/2017		Date entered into PCS	
		Level	Checklist Reference
N/A	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
N/A	Failure to submit required reports within 30 days	I	Att. A.A.3
N/A	Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
N/A	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
N/A	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
N/A	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
N/A	Other (specify)	II	
SNC			
N/A	CA in SNC for violation of any Level I criterion		
N/A	CA in SNC for violation of two or more Level II criterion		

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY:	Chuck Durham	DATE:	12/29/2017
TITLE:	EPA Contractor	TELEPHONE:	615-888-2928