

ATTACHMENT P – PRETREATMENT REPORTING REQUIREMENTS

The Discharger is required to submit annual and semi-annual Pretreatment Program Compliance Reports (Reports) to the Regional Water Board and submit copies of the Reports to the USEPA Region 9. This Attachment outlines the minimum reporting requirements of the Reports. If there is any conflict between requirements stated in this attachment and provisions stated in the Waste Discharge Requirements (WDR), those contained in the WDR will prevail.

I. ANNUAL REPORTING REQUIREMENTS

The Discharger is required to submit Annual Pretreatment Program Compliance Report (Annual Report). The Annual Report is due by March 1st of each year and must contain, but not be limited to, the following information:

A. A summary of wastewater and sludge monitoring.

The Discharger is required to monitor pollutants in the influent and the effluent of the POTW(s) as sludge is sent to HTP for processing. The Discharger is required to provide a summary of the monitoring. However, if the POTW does not process sludge/biosolids at the plant, the sludge/biosolids monitoring requirements prescribed in this attachment are not required.

The Discharger must monitor the priority pollutants that were identified in Section 307(a) of the Clean Water Act (excluding asbestos) and the nonpriority pollutants that may have existed in the wastewater and may be causing, or contributing to Pass-Through and/or Interference as defined in 40 Code of Federal Regulations (CFR) parts 403.3 (i) & (n), or adversely impacting sludge quality. The sampling and analyses must be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto, unless specified otherwise in this Order. In lieu of duplicative sampling, the Discharger may use one set of sampling and analytical results to fulfill the reporting requirements for both the compliance monitoring program and the Pretreatment Program when the monitoring requirements match. However, pretreatment reports shall be submitted under a separate cover as stated in Section III. of this Attachment.

Wastewater samples of the POTW's influent and effluent must be obtained from representative, flow proportioned, 24-hour composites (except for constituents that must be taken through grab samples, such as cyanide). A full scan of the priority pollutants must be conducted at least annually in August, when flow is not affected by wet weather. Subsequent quarterly sampling and analysis must be conducted for those pollutants found in the full scan with concentrations higher than the detection limits set forth in 40 CFR 136. Results of any additional quarterly sampling will be included in the following semi-annual or annual report.

Sludge shall be sampled and analyzed quarterly for the same pollutants that were detected during the annual scan of the priority pollutants for the influent and

effluent. Sludge must be taken as composite samples. When the sludge is dewatered onsite and is immediately hauled offsite for disposal, discrete samples from 12 batches of the dewatering operation must be collected and combined as a composite. If the sludge is dried in drying beds prior to its final disposal, samples collected from 12 representative locations in the drying beds must be taken and combined as a composite. Sludge analysis results must be expressed as mg/kg dry sludge, 100% dry weight basis. The Discharger will coordinate its monitoring requirements under this program with the requirements in the Hyperion Treatment Plant NPDES Permit (CA0109991, Order NO. R4-2010-0200).

B. A discussion of Pass-Through and Interference incidents.

The Discharger is required to report in the Annual Report the Pass-Through and Interference incidents, if any, at the treatment plant, that the Discharger knows, or suspects, were caused by non-domestic discharges to the POTW system. The discussion must include the causes of the incidents, the investigative actions taken to determine the source, the name and address of the party responsible, and the corrective actions taken to overcome and recover from the interference. The discussion must also include a review of the applicable pollutant limitations to determine whether any additional limitations, or changes to existing requirements, may be necessary to prevent Pass-Through or Interference.

C. A list of Discharger's industrial users.

The Discharger is required to update its significant industrial users (SIUs) list annually and to submit the list in the Annual Report. The Discharger is required to report deletions, additions, and name changes in the previously submitted SIU list. The Discharger must provide a brief explanation for each change.

D. A summary of SIU compliance.

The Discharger is required to provide a summary of SIU compliance in the Annual Report. The Discharger must characterize the compliance status of each SIU by providing a list or table, which includes the following information:

1. Name of the SIU;
2. Category, if subject to federal categorical standards, or nature of the wastewater discharge;
3. Type of wastewater treatment or control processes in place;
4. Number of monitoring samples taken by the POTW during the year;
5. Number of monitoring samples taken by the SIU during the year;
6. Verification that all required certifications were provided for an SIU subject to discharge requirements for total toxic organics;
7. Standards violated during the year (Federal and local, reported separately);
8. Description of the significant noncompliance (SNC) if the SIU was in SNC as defined at 40 CFR part 403.8(f)(2)(viii) during the year; and,
9. A summary of enforcement or other actions taken during the year to return the SIU in SNC to compliance. Describe the type of action, final compliance date,

and the amount of fines and penalties collected, if any. Describe any proposed actions for bringing the SIU in SNC into compliance.

E. A summary of program changes.

The Discharger is required to report changes of its POTW Pretreatment Program. A description of any significant changes in operating the pretreatment program which differ from the previous year including, but not limited to, changes concerning the program's sewer use ordinances, legal authority, local limits, monitoring program or monitoring frequencies, enforcement policy, administrative structure, funding levels, or staffing levels.

F. A summary of budget.

The Discharger is required to include annual pretreatment program budgets in the Annual Report. These annual budgets should include a) personnel costs (salaries, benefits, insurance, etc.), b) transportation costs (direct and indirect costs of trucks, gasoline, maintenance, etc.), c) overall laboratory analyses costs (contractor or in-house), d) equipment costs, e) administrative costs (supplies, overhead, secretarial time, attorney costs, copying, etc.), f) training and travel costs, g) contractor assistance, and h) other direct and indirect costs.

G. A summary of public participation.

The Discharger is required to provide a summary of public participation of pretreatment program in the Annual Report. The summary should describe activities to involve and inform the public of the program, including a copy of the newspaper notice required under 40 CFR part 403.8 (f)(2)(vii).

H. A description of sludge disposal methods.

The Discharger is required to report in the Annual Report the sludge disposal methods and a description of any changes from the previously submitted methods.

I. A description of pollutant reduction efforts.

The Discharger is required to describe in the Annual Report any programs the POTW implements to reduce pollutants from the non-domestic sources.

II. SEMI-ANNUAL REPORTING REQUIREMENTS

The Discharger is required to submit Semi-Annual Pretreatment Program Compliance Report (Semi-Annual Report). The Semi-Annual Report covers the periods from January 1 to June 30 and is due by September 1st of each year. The Semi-Annual Report must contain, but not be limited to, the following information:

A. A discussion of Pass-Through and Interference incidents as described in Section I.B. of this Requirements.

- B. A summary of SIU compliance and enforcement actions as described in Section I. D. of this Requirements.

III. LOCAL LIMITS EVALUATION

- A. In accordance with 40 CFR part 122.44(j)(2)(ii), the POTW shall provide a written technical evaluation of the need to revise local limits under 40 CFR part 403.5©(1), within ninety (90) days of permit issuance.

IV. SIGNATORY REQUIREMENTS AND REPORT SUBMITTAL

- A. Signatory Requirements.

The annual report, semi-annual, and local limits evaluation must be signed by a principal executive officer, ranking elected official or other duly authorized employee if such employee is responsible for the overall operation of the POTW. Any person signing these reports must make the following certification [40 CFR part 403.6(a)(2)(ii)]:

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.

- B. Report Submittal.

An original copy of the Annual Report and Semi-Annual Report must be sent to the Pretreatment Program Coordinator of the Regional Board and the duplicate copies of the Reports must be sent to USEPA through the following addresses:

Information and Technology Unit
Attn: Pretreatment Program Coordinator
California Regional Water Quality Control Board, Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Pretreatment Program
CWA Compliance Office (WTR-7)
Water Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901