EAST BAY
MUNICIPAL UTILITY DISTRICT

AMIT MUTSUDDY
DIRECTOR OF WASTEWATER
(510) 287-1149
amit.mutsuddy@ebmud.com

February 24, 2023

VIA E-MAIL, UPLOADED TO CIWQS

Mr. Michael Chee
Pretreatment Program Coordinator
SF Bay RWQCB
1515 Clay Street, Suite 1400
Oakland, CA 94612

Ms. Amelia Whitson
Pretreatment Coordinator
US EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: East Bay Municipal Utility District 2022 Annual Pretreatment Report

Dear Mr. Chee and Ms. Whitson:

The East Bay Municipal Utility District (EBMUD) hereby submits the 2022 Pretreatment Annual Report, which was developed in accordance with National Pollutant Discharge Elimination System Permit No. CA 0037702. Order No. R2-2020-0024. EBMUD's pollution reduction activities for 2022 can be found in the Annual Pollution Prevention Report (submitted separately).

If you have any questions regarding this report, please contact Adam Kern, Supervisor of Pretreatment and Pollution Prevention Programs, at 510-287-1622 or adam.kern@ebmud.com.

Sincerely,

Alicia R. Chakrabarti, P.E.
Manager of Wastewater Environmental Services

Enclosure

cc: Amit Mutsuddy, EBMUD

W:\nab\ESD\IDS\Administration\Reports\Annual 2022\Pretreatment Report\Report\2022

THIS PAGE INTENTIONALLY LEFT BLANK FOR COVER

2022

Pretreatment Report

EBMUD | Wastewater Department

THIS PAGE INTENTIONALLY LEFT BLANK

EAST BAY MUNICIPAL UTILITY DISTRICT
2022 PRETREATMENT REPORT
COVER SHEET

National Pollutant Discharge Elimination System (NPDES) permit number:
Order No. R2-2020-0024, NPDES No. CA0037702

For further information concerning this report, contact:

Adam Kern
Supervisor of Pretreatment and Pollution Prevention Programs
East Bay Municipal Utility District
375 11th Street, M.S. 702
Oakland, CA 94607-4240
(510) 287-1622
adam.kern@ebmud.com

Period covered in this report: **January 1, 2022 to December 31, 2022**

"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."

AMIT MUTSUDDY, P.E.
DIRECTOR OF WASTEWATER

2/17/23
DATE

THIS PAGE INTENTIONALLY LEFT BLANK

NPDES Reporting Requirement	Location in Annual Report
A. **Cover Sheet**	Above
B. **Introduction**	Page 1
C. **Definitions**	Page iii
D. **Discussion of Upset, Interference and Pass-Through**	Page 2
E. **Influent, and Effluent Monitoring Results**	Page 3
Biosolids Monitoring	Page 6
F. **Inspection, Sampling and Enforcement Programs**	Page 11
G. **Updated List of Regulated SIUs**	Page 16
H. **SIU (categorical and non-categorical) Compliance Activities**	Page 17
1. **Inspection and Sampling Summary**	Exhibit H, Exhibit I
2. **Enforcement Summary**	Exhibit G
3. **July-December Semiannual Data**	Exhibit E
I. **Baseline Monitoring Report Update**	Page 16
J. **Pretreatment Program Changes**	Page 9
K. **Pretreatment Program Budget**	Page 9
L. **Public Participation Summary**	Page 17
M. **Biosolids Storage and Disposal Practice**	Page 6
N. **Other Pollutant Reduction Activities**	Page 15
O. **Permit Compliance System (PCS) Data Entry Form**	Page 50

TABLE OF CONTENTS

TABLE OF TABLES

EXHIBITS

TABLE OF FIGURES

DEFINITIONS AND ABBREVIATIONS

Definitions

Baseline Monitoring Report (BMR): The report required by the Control Authority from industrial users subject to Categorical Pretreatment Standards. The BMR due dates and contents are cited in 40 CFR403.6 and 403.12.

Biosolids: The solid organic matter made from the anaerobic digestion of sewage sludge.

Business Classification Code (BCC): A classification of dischargers based on the 1987 Standard Industrial Classification Manual, Office of Management and Budget of the United States of America.

Carbonaceous Biological Oxygen Demand (cBOD): Represents the Biochemical Oxygen Demand from organic (carbon-containing) compounds.

Categorical Industry: An industry that must comply with National Categorical Pretreatment Standards as published by the United States Environmental Protection Agency (EPA).

Categorical Industrial User (CIU): A discharger subject to a categorical pretreatment standard.

Categorical Pretreatment Standards: Any regulation containing pollutant discharge limits promulgated by the EPA in accordance with Section 307(b) and (c) of the Clean Water Act, which applies to Industrial Users. Includes prohibitive discharge limits established pursuant to 40 Code of Federal Regulations, 403.5 [Ref. 40 Code of Federal Regulations, 403.3(j)].

Cease and Desist Order (CDO): An order issued by the Director of Wastewater directing a discharger to achieve compliance with permit requirements and/or EBMUD Wastewater Control Ordinance.

Closed (CL) Facility: A facility that no longer operates within the EBMUD Special District No. 1 (SD-1) service area.

Compliance Schedule: Action(s) required of an industrial discharger to comply with pretreatment regulations. A compliance schedule may be included as a condition of the industrial discharger's wastewater discharge permit or by an Administrative or Judicial Order.

Compliance Status: Determined through review of monitoring data and other information to assess an industrial discharger's compliance with schedules, reporting requirements, and applicable pretreatment standards. An industrial discharger's compliance status is reported quarterly as consistent compliance, inconsistent compliance, significant noncompliance or unknown.

Consistent Compliance (C): The compliance status assigned to an industrial discharger having no violation during the last reporting quarter and no unresolved significant noncompliance issues from the previous reporting quarter.

Declassify: The removal of an industrial user from EBMUD's Significant Industrial Users list.

Director: Director of the EBMUD Wastewater Department or his/her designated representative.

Discharge Minimization Permit: Mandatory permit that includes monitoring and/or reporting requirements.

East Bay Municipal Utility District (EBMUD): A municipal utility district formed under Division 6 of the Public Utilities Code of the State of California, also known as the Municipal Utility District Act (MUD Act), which provides water and wastewater service to East Bay communities [Ref. MUD Act, Division 6, Chapter 1, Article 1, Section 11503].

EBMUD Wastewater Control Ordinance: The Ordinance enacted by the EBMUD Board of Directors establishing regulations for: 1) the interception, treatment, and disposal of wastewater and industrial wastes, 2) control of wastewater, including discharger classification and issuance of permits, 3) charges, and 4) penalties for violations of the Ordinance, revision effective August 22, 2013.

EBMUD Special District No. 1 (SD-1): The special district for sewage disposal created under Division 6 of the Public Utilities Code of the State of California, also known as the Municipal Utility District Act (MUD Act), to provide treatment of wastewater from East Bay communities [Ref. MUD Act, Division 6, Chapter 8, Article 1, Section 13451].

Federal Categorical: See Categorical Industry.

General Pretreatment Regulations: Any regulations promulgated by the EPA in accordance with Sections 307(b) and (c) and 402(b)(8) of the Act (33 U.S.C. 1347) for the implementation, administration, and enforcement of pretreatment standards.

Groundwater Permit: Discharge minimization permit issued to dischargers of groundwater that serves as a waiver to the prohibition of groundwater discharges found in EBMUD Wastewater Control Ordinance, Title I, Section 5.

Inconsistent Compliance (IC): The compliance status assigned to an industrial discharger having one or more violations during a reporting quarter, which did not result in significant noncompliance, and no long-term pattern of violations.

Indirect Discharge: The introduction of pollutants into a publicly owned treatment works from any non-domestic source regulated under Section 307(b), (c) or (d) of the Clean Water Act [Ref. 40 Code of Federal Regulations, 403.3(g)].

Industrial User (IU): A source of indirect discharge [Ref. 40 Code of Federal Regulations, 403.3(h)].

Interceptor: All transmission systems, including all pipes, force mains, gravity sewer lines, lift stations, and pump stations that are owned and operated by EBMUD.

Interference: A discharge, which, alone or in conjunction with a discharge or discharges from other sources, both:
(1) Inhibits or disrupts the Publicly Owned Treatment Works (POTW), its treatment processes or operations, or its sludge processes, use or disposal; and
(2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act [RCRA]), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act [Ref. 40 Code of Federal Regulations, 403.3(h)].

Mandatory Permit: A permit that must be obtained by dischargers who are in the categories cited in the EBMUD Wastewater Control Ordinance, Title IV, Section 1.a.

National Pollutant Discharge Elimination System (NPDES): The national program established under the Clean Water Act to regulate discharges to the navigable waters of the United States [Ref. Clean Water Act, Title IV, Section 402].

New Permit: A Wastewater Discharge Permit that was not in effect during the previous reporting year.

New Source:
(1) 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 which will be applicable to such source if such standards are thereafter promulgated, provided that:
  (i) The building, structure, facility, or installation is constructed at a site at which no other source is located; or
  (ii) The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
  (iii)The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new

facility is engaged in the same general type of activity as the existing source should be considered.

(2) Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of paragraphs (1)(ii) or (1)(iii) of this section, but otherwise alters, replaces, or adds to existing process or production equipment.

(3) Construction of a new source as defined under this paragraph has commenced if the owner or operator has:

(i) Begun, or caused to begin as part of a continuous onsite construction program:

a. Any placement, assembly, or installation of facilities or equipment; or

b. Significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

(ii) Entered into a binding contractual obligation for the purchase of facilities or equipment which is intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

Non-Categorical Industry: An industry that is exempt from the Categorical Pretreatment Standards.

Non-Significant Categorical Industrial User A categorical industrial user that meets the following criteria:

Never discharges more than 100 gallons per day of total categorical wastewater and

(1) Has consistently complied with all applicable categorical pretreatment standards and requirements

(2) Annually submits the certification statement required in 40 CFR 403.12(q)

(3) Never discharges any untreated concentrated wastewater.

NPDES Permit: The regulatory agency document, issued either by a federal or state agency, that is designed to control all discharges of pollutants into navigable waters from all point sources of pollution, including industries and publicly owned treatment works.

Pass-Through: Discharge which exits a publicly owned treatment works (POTW) into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) [Ref. 40 Code of Federal Regulations, 403.3(n)].

Publicly Owned Treatment Works (POTW): A treatment works as defined by Section 212 of the Clean Water Act, which is owned by EBMUD. This definition includes any EBMUD-owned devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes EBMUD-owned sewers, pipes and other conveyances that convey wastewater to that portion of the POTW which is designed to

provide treatment (including recycling and reclamation) of municipal sewage and industrial waste.

Pretreatment: The reduction of the amount of pollutants, the elimination of pollutants or the alteration of the nature of pollutant properties in wastewater through physical, chemical or biological processes or process changes prior to or in lieu of discharging these pollutants into a POTW. [Ref. 40 Code of Federal Regulations, 403.3(q)]

Reclassified (RC): An IU regulated under a Wastewater Discharge Permit (federal categorical or local), that becomes regulated under a different permit category.

Recycling: Reuse of materials that would otherwise be considered waste.

Recycled Water: Wastewater that has been treated to reduce contaminants to low enough levels to enable the water to be used again safely for certain beneficial uses or controlled uses that would not otherwise occur.

Resource Recovery Permit: A mandatory permit that regulates the trucked materials arriving at the SD-1 Wastewater Treatment Plant for treatment.

Significant Industrial User (SIU):
(1) A user subject to Categorical Pretreatment Standards; or
(2) A user that:
   (i) Discharges an average of twenty-five thousand (25,000) gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater);
   (ii) Contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
   (iii)Is designated as such by EBMUD on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.
(3) Upon a finding that a user meeting the criteria in Subsection (2) above has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, EBMUD may at any time, on its own initiative or in response to a petition received from a user, determine that such user should not be considered a significant industrial user.

Significant Noncompliance: An SIU (or any IU which violates paragraphs 3, 4, or 8 below) is in significant noncompliance with applicable pretreatment requirements if any violation meets one or more of the following criteria:
(1) Chronic violations of wastewater discharge limits, defined as those in which 66 percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) a numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l).

(2) Technical Review Criteria (TRC) violations, defined as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period are equal to or exceed the product of the numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC.

TRC = 1.4 for Biological Oxygen Demand, Total Suspended Solids, fats, oil, and grease.

TRC = 1.2 for all other pollutants (except pH).

(3) Any other violation of a pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum or longer-term average, instantaneous limit, or narrative standard) that EBMUD determines has caused, alone or in combination with other discharges, interference or pass-through (including endangering the health of POTW personnel or the general public).

(4) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.

(5) Failure to meet, within 90 days after the due date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.

(6) Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.

(7) Failure to accurately report noncompliance.

(8) Any other violation or group of violations which EBMUD determines will adversely affect the operation or implementation of the local pretreatment program.

Slug Discharge or Loading: Any discharge at a flow rate or concentration that could cause a violation of the prohibited discharge standards the EBMUD Wastewater Control Ordinance, Section 2.2. A slug discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch discharge that has a reasonable potential to cause interference or pass-through or in any other way violate EBMUD's regulations, local limits, or permit conditions.

Source Control: Any activity that prevents the generation of waste or pollution through a change in raw materials or product reformulation (material substitution), or operational or process improvements (process modification).

Terminated (T): A Minimization, Estimation or Pollution Prevention Permit that ceases to be in effect due to reasons such as business closure, business name change or regulated process change. In exceptional cases, the Director may terminate a permit for violation of the permit terms and conditions or the EBMUD Wastewater Control Ordinance provisions. A discharger who has a permit terminated by the Director is required to apply for a new permit within 30 days of notice of termination.

Total Identifiable Chlorinated Hydrocarbons (TICH): The sum of the concentrations of all quantifiable values equal to or greater than the detection limit for all chlorinated hydrocarbons identified by EPA Method 624.

Total Suspended Solids (TSS): The concentration of nonfilterable residue dried at 103° to 105°C on a filter in conformance with EBMUD's approved method.

Upset: An exceptional incident in which there is unintentional and temporary noncompliance with an IU's discharge limits because of factors beyond the reasonable control of the IU.

Violation Follow-Up Inspection: An inspection specifically conducted to continue investigation of a past violation and assess the industrial user's compliance status.

Wastewater Control Ordinance: See EBMUD Wastewater Control Ordinance.

Wastewater Discharge Permit: This permit type establishes general and site-specific compliance and reporting requirements, applicable discharge limitations, self-monitoring requirements, and billing conditions for unique wastewater strengths and flow as applicable.

Main Wastewater Treatment Plant (MWWTP): EBMUD's Main Wastewater Treatment Plant, located at 2020 Wake Avenue, Oakland, California.

Wet Weather Facility (WWF): A remote wastewater facility designed to provide treatment of additional wet weather flows. EBMUD's Wet Weather Facilities were built to provide additional wet weather flow capacity and reduce overflows of untreated wastewater during peak storm events.

Zero Discharge Categorical Industrial User (Zero Discharger): a categorical industrial user that never discharges process wastewater.

Abbreviations

BCC: Business Classification Code

BMR: Baseline Monitoring Report

C: Consistent compliance

CAO: Cleanup and Abatement Order

cBOD: Carbonaceous Biological Oxygen Demand

CDO: Cease and Desist Order

CIU: Categorical Industrial User

CL: Closed

COD: Chemical Oxygen Demand

EBMUD: East Bay Municipal Utility District

EPA: United States Environmental Protection Agency

ERP: Enforcement Response Plan

FOG: Fats, Oils, and Grease

FY: Fiscal Year

IC: Inconsistent Compliance

IU: Industrial User

MGD: Million gallons per day

MWWTP: Main Wastewater Treatment Plant

N: New

NaOH: Sodium Hydroxide

NOV: Notice of Violation (Violation Notice)

NPDES: National Pollutant Discharge Elimination System

NSCIU: Non-Significant Categorical Industrial User

PCA: Pretreatment Compliance Audit

POTW: Publicly Owned Treatment Works

R2: Resource Recovery

RC: Reclassified

RCRA: Resource Conservation and Recovery Act

RWQCB: San Francisco Bay Regional Water Quality Control Board

SD-1: EBMUD Special District No. 1

SIU: Significant Industrial User

S.U. Standard Units

SNC: Significant Noncompliance

T: Terminated

TICH: Total Identifiable Chlorinated Hydrocarbons

TTO: Total Toxic Organics

TRC: Technical Review Criteria

TSS: Total Suspended Solids

WWF: Wet Weather Facility

ZD: Zero Discharger

1. INTRODUCTION

This report serves as the 2022 Pretreatment Annual Report for the East Bay Municipal Utility District (EBMUD). EBMUD's pollution reduction activities for 2022 can be found in the Annual Pollution Prevention Report (submitted separately).

1.1 EBMUD Background Information

EBMUD is a publicly owned utility formed under the Municipal Utility District (MUD) Act that was passed by the California state legislature in 1921. In accordance with the MUD Act's provisions, voters in the East San Francisco Bay Area created EBMUD in 1923 to provide water service. The MUD Act was amended in 1941 to enable formation of special districts. In 1944, voters in six East Bay cities elected to form EBMUD's Special District No. 1 (SD-1) to provide treatment of wastewater discharged to the San Francisco Bay. In 1971, the Stege Sanitary District was annexed to SD-1.

EBMUD formed the Wastewater Department following approval of SD-1. The Wastewater Department is responsible for treatment and disposal of domestic, commercial, and industrial wastewater from the cities of Alameda, Albany, Berkeley, Emeryville, Oakland, Piedmont, and the Stege Sanitary District, which includes the City of El Cerrito, the Richmond Annex, and unincorporated Kensington. The individual communities own and maintain their collection systems (sewers and pumping stations) and discharge to one of five EBMUD interceptors (large diameter sewers).

The Wastewater Department owns and operates the interceptors, the Main Wastewater Treatment Plant (MWWTP), a deep-water outfall into San Francisco Bay, and three wet weather facilities (WWFs). Detailed information about EBMUD's service area and wastewater facilities is provided below.

- EBMUD's wastewater service area is 88 square miles, which includes approximately 1,600 miles of community-owned and maintained sanitary sewers.
- EBMUD owns and maintains 29 miles of gravity sewer interceptors, 15 pumping stations, and 9 miles of sewer force mains.
    - EBMUD's Wastewater Department serves a population of approximately 740,000, which includes approximately 180,000 accounts, of which over 19,000 are commercial, industrial, and institutional users.
- The MWWTP has a permitted dry weather secondary treatment design capacity of 120 million gallons per day (MGD). Dry weather influent flow treated ranged between 45 and 50 MGD.

1.2 Applicable Interagency Agreements

EBMUD approved its original wastewater control ordinance in 1973, which established wastewater quality standards for all wastewater discharges into community sewers discharging to the EBMUD interceptor system. The wastewater control ordinance has been updated and revised several times over the years, and the current version (revised in 2013) is available on EBMUD's website.

1.3 Pretreatment Compliance Inspection/Audit Summary

A Pretreatment Compliance Audit (PCA) was conducted on January 28-29, 2019, by contractor PG Environmental, acting on behalf of the San Francisco Bay Regional Water Quality Control Board (Regional Board) and the U.S. Environmental Protection Agency (EPA). The 2019 PCA Summary Report was received by EBMUD on August 13, 2019. EBMUD submitted an initial response to the 2019 PCA findings on October 11, 2019, and an additional response on March 30, 2020, and has addressed the findings of the 2019 PCA Summary Report. There were no Cleanup and Abatement Orders (CAO) or other enforcement related actions required by the Regional Board or the EPA.

2. PLANT INFORMATION

2.1 Upset, Interference, and Pass-Through

In 2022, there were no upsets, interference, or pass-through discharges at the MWWTP.

2.2 Compliance with NPDES Permit Limitations

The MWWTP is regulated under NPDES permit CA0037702. Order number R2-2020-0024 became effective on November 1, 2020 and expires on October 31, 2025. No violations of any effluent limitations for the MWWTP were recorded in 2022, and the MWWTP performed as expected.

2.3 Influent, Effluent and Biosolids Monitoring Procedures and Results

EBMUD's practices surrounding chain-of-custody, sampling containers, sample transport, sample acceptance criteria, sample preservation and hold times are conducted in accordance with EPA recommended guidelines and requirements under the California Environmental Laboratory Accreditation Program.

Influent, Effluent, and Biosolids Sampling Procedures

- **Metals:** Influent and effluent samples collected for metals are 24-hour flow proportioned composites collected via an ISCO autosampler into polyethylene containers and are held at 4^{o}C during sample collection. Sample collection and transport on ice is documented on the field chain-of-custody form. Following relinquishment to the EBMUD laboratory and verification that sample acceptance criteria have been met, a subsample of the composite is poured off into a certified container and preserved to pH <2 with trace metals grade nitric acid.
- **Cyanide:** Cyanide samples are collected from a dedicated grab sampling tap at each station facility. Influent and effluent cyanide grab samples are collected in a certified dark brown plastic container to prevent ultraviolet light penetration. The influent sampling container includes sodium thiosulfate as a dechlorinating agent. At the point of sample collection, samples are preserved in the field with sodium hydroxide (NaOH) to pH >10 and documented on the field chain-of-custody form. For the effluent, the cyanide grab sample is collected from a dechlorinated source and does not require a dechlorinating agent. The certified dark brown plastic container is pre-dosed with NaOH. Following documented transport on ice, sample and chain-of-custody relinquishment, the laboratory documents verification of dechlorination and pH >10 on the chain-of-custody record.

- **EPA 624, 625:** Samples collected for volatiles (EPA 624) and semi-volatiles (EPA 625) are collected from a dedicated grab sampling tap. EPA 624 samples are collected in 40 milliliter certified organic-free vials with Teflon septa. Care is taken to avoid aeration and headspace during the collection of the grab samples. Sample vials contain sodium thiosulfate as a dechlorinating agent, and traceable hydrochloric acid is added in the field to adjust the pH for sample preservation. For the determination of Acrolein by EPA 624, samples are collected in separate certified vials that contain sodium thiosulfate yet are not preserved by acidification to prevent the loss of the analyte of interest. Sample acceptance criteria verifying zero head-space is documented on the chain-of-custody. EPA 625 samples are collected in certified organic-free one-liter amber containers with ascorbic acid added as a dechlorinating agent.
- **Biosolids:** Grab samples of dewatered centrifuge cake are collected in certified organic-free quart jars every six hours over a five-day period and documented on the field chain-of-custody form. Biosolids samples are stored at 4ºC until all twenty grab samples have been collected and are available for compositing by the laboratory. The sample is composited by weighing and combining an equal mass of each grab sample. The mass removed from each grab is documented by weight, composited by homogenizing in an acid-cleaned container, and subsampled into certified container for metals, cyanide, volatiles, and semi-volatiles.

Influent, Effluent and Biosolids Sampling Results

The majority of organic priority pollutant compounds were non-detect in influent samples analyzed in 2022. Results for priority pollutant compounds detected in influent samples are summarized in Table A.

Table A: Priority Pollutant Volatile Organics (EPA Method 624.1 and Method 625.1)
Influent Monitoring - Detected Compounds

Parameter	Date Collected	Result (ug/l) [1]	Qualifier[2]
Bis (2-Ethylhexyl) Phthalate	2/2/2022	11.1	E
Chloroform	2/2/2022	9.81	
Di-n-octylphthalate	2/2/2022	13	E
Diethyl Phthalate	2/2/2022	3.21	E
Methylene Chloride	2/2/2022	9	
Phenol	2/2/2022	13.5	
Toluene	2/2/2022	3.35	E

[1] µg/l = micrograms/liter
[2] E – Estimated value, concentration outside calibration range

The annual requirement to analyze for the California Toxic Rule Priority Pollutants on the effluent waste stream has been waived under Order R2-2016-0008. Per Order R2-2016-0008, the frequency is once per permit cycle for Order R2-2020-0024. These samples were collected in 2021 and majority of organic priority pollutant compounds were non-detect in effluent samples analyzed, including Dioxin-TEQ. Results for detected priority pollutant compound effluent samples from 2021 are summarized in Table B.

Table B: Priority Pollutant (EPA 624.1, 625.1, 608, and 1613B) 2021 Effluent Monitoring - Detected Compounds

Parameter	Date Collected	Result (µg/l)[1]	Qualifier[2]
Chloroform	3/10/2021	6.52	
Methylene Chloride	3/10/2021	0.42	E
Toluene	3/10/2021	0.51	

[1] µg/l = micrograms/liter
[2] E - Estimated value, concentration outside calibration range

Quarterly effluent monitoring for polychlorinated biphenyls, as congeners, as required by Order R2-2017-0041, was completed for this reporting period. Results were within normal range based on past monitoring.

Table C summarizes the analytical results for 2022 influent and effluent metals and cyanide. Figure A illustrates influent and effluent metals monitoring results for the past five years. Influent metals, including arsenic, cadmium, copper, mercury, zinc, chromium, lead, nickel, and Total Suspended Solids (TSS) were significantly elevated in April, May, June, and September 2019. The timing of the elevated metals and TSS were associated with aggressive interceptor cleaning as part of the South Interceptor rehabilitation project, which released legacy metal contaminants.

In August 2022, influent metals were again elevated. TSS was also elevated from June through September, although this did not appear to coincide with any specific interceptor cleaning activity. During this time there was no impact to plant performance and the effluent TSS and metals remained low and stable.

Table C: 2022 Influent and Effluent Monitoring for Metals and Cyanide (µg/l)

Parameter	Location	Method	January	February	March	April	May	June	July	August	September	October	November	December
Arsenic	Influent	EPA 200.8	4.48	5.2	4.88	4.03	3.98	4.13	3.38	5.56	4.63	4.37	4.01	5.55
	Effluent	EPA 200.8	3.31	4.02	3.42	2.42	2.85	3.54	1.94	3.1	2.62	2.43	2.22	3.19
Cadmium	Influent	EPA 200.8	0.23	0.25	0.31	0.33	0.24	0.29	0.3	0.63	0.47	0.35	0.32	0.27
	Effluent	EPA 200.8	0.14	0.32	0.18	0.19	0.13	0.03	0.11	0.24	0.04	0.08	0.03	0.03
Chromium	Influent	EPA 200.8	4.58	5.5	4.67	5.67	3.27	5.1	4.07	9.76	7.36	5.52	4.14	4.37
	Effluent	EPA 200.8	0.54	0.66	0.54	0.7	0.6	0.62	0.51	2	0.63	0.56	0.56	0.54
Copper	Influent	EPA 200.8	70.88	75.78	80.2	95.63	74.75	89.26	89.05	148.2	111.13	101.45	73.7	76.18
	Effluent	EPA 200.8	4.69	11	5.76	6.89	6.4	6.32	6.04	6.9	4.55	6.91	6.46	5.57
Cyanide	Influent	SM4500-CN C, E	1.8	2.3	1.8	1.9	1.8	3.9	2.0	3.9	3.4	5.1	3.5	2.8
	Effluent	SM4500-CN C, E	1.8	3.5	2.7	3.4	4.1	1.8	4.0	4.3	3.7	4.8	2.6	2.2
Lead	Influent	EPA 200.8	4.54	5.1	5.48	5.95	5	8.86	5.88	16.12	7.69	6.64	6.48	7.41
	Effluent	EPA 200.8	0.47	0.38	0.34	0.31	0.54	0.66	0.29	0.43	0.31	0.3	0.35	0.3
Mercury	Influent	EPA 245.1	0.0798	0.0905	0.104	0.0885	0.1133	0.0942	0.118	0.6748	0.1398	0.1678	0.0764	0.229
	Effluent	EPA 1631	NS	0.0043	NS	NS	0.0022	NS	NS	0.0024	NS	NS	0.0027[1]	NS
Nickel	Influent	EPA 200.8	10.06	10.01	9.35	10.38	7.91	10.49	12.41	17.2	13.63	12.13	11.14	11.97
	Effluent	EPA 200.8	6.14	6.8	6.02	7.12	5.75	6.6	8.76	9.4	9.24	8.25	9.03	6.58
Selenium	Influent	EPA 200.8	1.52	1.37	1.38	1.6	1.05	1.64	1.42	3.18	1.41	1.76	1.22	1.22
	Effluent	EPA 200.8	0.84	0.63	0.52	0.74	0.92	0.43	0.54	1.6	0.54	0.78	0.55	0.43
Silver	Influent	EPA 200.8	0.6	0.48	0.5	0.52	0.39	0.67	0.43	1.01	0.67	0.7	0.54	0.34
	Effluent	EPA 200.8	0.07	0.08	0.06	0.04	0.07	0.12	0.06	0.4	0.05	0.12	0.11	0.07
Zinc	Influent	EPA 200.8	147	162.75	186.2	199.75	183.75	227.4	207.25	338	239	234.75	180	187.25
	Effluent	EPA 200.8	34.7	34.9	36.7	31.1	37.9	28.3	26.4	25	39.4	36	47.2	35.2

Note: Influent results are averaged over each month. If parameter was not detected, the detection limit is used in the average.
NS – Not sampled. Effluent sampling for Mercury is conducted on a quarterly basis as required by NPDES No. CA0038849, Order No. R2-2021-0028.
[1] The 2022 fourth quarter effluent result for mercury did not meet method preservation requirements. EBMUD will be collecting a make-up sample in quarter one of 2023 since the result collected in November 2022 is not suitable for regulatory reporting.

2.4 Biosolids Monitoring, Storage, Land Application, and Disposal Practice

EBMUD produces Class B biosolids with an average of 22 percent total solids. Biosolids are collected in an enclosed air-scrubbed hopper that consists of three bins, each with a capacity of 200,000 pounds or 150 cubic yards. Table D presents the results for detected parameters from the two rounds of 5-day composite biosolids sampling in 2022. All other parameters were non-detect. All results, when converted to dry ton basis, are significantly below the ceiling concentrations for the use and disposal for land application as outlined in 40 CFR Part 503. Metals concentrations were consistently low during both the wet and dry weather sampling.

Table D: 2022 Biosolids Monitoring Detected Parameters (mg/kg)

Dewatering Method:	**Centrifuge**		**Centrifuge**		**Ceiling Concentrations**
Season:	**Wet Season**		**Dry Season**		
Sample Dates:	**02/13/2022-02/17/2022**		**08/06/2022-08/10/2022**		
Units (Percent Solids):	**mg/kg-wet (22%)**		**mg/kg-wet (22%)**		**mg/kg (dry weight)**
Method Parameter	**Result**	**Qualifier[1]**	**Result**	**Qualifier[1]**	**40 CFR 503.13**
EPA 6010B					
Arsenic	**1.9**	J	**1.0**	J	75
Barium	**62.0**		**45.0**		None
Beryllium	**0.03**	J	**0.05**	U	None
Cadmium	**0.5**	U	**0.33**	J	85
Chromium	**9.6**		**7.0**		None
Cobalt	**1.1**	J	**1.4**	J	None
Copper	**79.0**		**82.0**		4,300
Lead	**5.0**		**5.3**		840
Molybdenum	**1.9**	J	**1.7**		75
Nickel	**6.5**	J	**5.0**		420
Selenium	**0.7**	U	**0.72**	J	100
Silver	**0.7**	U	**0.27**	J	None
Vanadium	**4.9**	J	**4.1**		None
Zinc	**130**		**170**		7,500
EPA 7471A					
Mercury	**0.1**	J	**0.1**	J	57
SM 4500-CN-CE					
Cyanide	**0.559**	U	**0.49**		None
EPA 8260B[2]					
Acetone	**6.9**		**NS**		None
2-Butanone	**1.1**		**NS**		None
N-Butylbenzene	**0.046**	J	**NS**		None
P-Isopropyltoluene	**0.11**		**NS**		None
EPA 8270C[2]					
See footnote[3]	**U**		**NS**		None
SM 4500-S-2D					
Sulfide	**0.22**	U	**1**		None

[1]U - Not detected; J - Detected below reporting limit, result is estimated

[2] NS – Not Sampled. EPA 8260B and 8270C are now sampled annually as required by R2-2021-0028.

[3] All results for EPA 8270C were non-detect.

In 2022, the District produced 77,226 wet tons of biosolids. Of these, 77 percent went to land application sites as soil amendment, 9 percent to landfill as alternative daily cover, 8 percent to a composting facility, and 6 percent to a thermal hydrolysis facility for conversion into liquid fertilizer. Table E provides the amount of biosolids in wet tons for each of these uses by month.

Table E: 2022 EBMUD Biosolids Hauling and End Use by Month (Wet Tons)

Month	Alternative Daily Cover	Compost	Thermal Hydrolysis	Land Application	Monthly Total
January	3,604	1,913	182	1,297	6,996
February	1,293	1,463	0	3,646	6,401
March	1,792	2,498	0	2,958	7,248
April	46	193	0	6,051	6,289
May	0	0	0	6,862	6,862
June	0	0	0	5,669	5,669
July	0	0	713	5,012	5,725
August	0	0	587	5,387	5,974
September	0	0	633	5,417	6,049
October	0	0	1,367	5,314	6,681
November	0	0	566	6,044	6,610
December	0	161	607	5,953	6,720
Totals	**6,735**	**6,227**	**4,654**	**59,610**	**77,226**

2.5 Plant Operating Data

Table F presents key MWWTP operating data for 2022. Effluent carbonaceous biological oxygen demand (cBOD), total suspended solids (TSS), and pH were compliant with NPDES permit effluent limitations. Although influent TSS was elevated between June and September, effluent TSS remained consistent indicating that there was no impact on treatment plant performance.

Table F: Wastewater Treatment Plant Operating Data 2022

FLOW DATA	Units	Jan	Feb	Mar	April	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Total	Avg	Min	Max
Daily Average	MG	58	48	47	48	44	43	42	42	43	42	45	66		47	42	66
Minimum Day	MG	48	45	43	39	42	39	37	39	39	40	40	41		41	37	48
Maximum Day	MG	95	53	54	63	48	49	50	46	46	44	62	204		68	44	204
Monthly Total	MG	1,784	1,338	1,445	1,452	1,376	1,291	1,296	1,315	1,279	1,308	1,335	2,052	17,270	1,439	1,279	2,052
INFLUENT QUALITY																	
cBOD (avg.)	mg/l	232	314	319	328	344	421	540	504	425	367	343	421		380	232	540
TSS (avg.)	mg/l	319	373	394	443	393	716	924	920	848	524	479	763		591	319	924
pH (avg.)	pH	7.2	7.2	7.2	7.2	7.1	7.1	7.0	7.0	6.9	6.8	6.9	7.1		7.1	6.8	7.2
EFFLUENT QUALITY																	
cBOD (avg.)[1]	mg/l	7	9	6	9	6	7	8	8	8	7	7	6		7	6	9
TSS (avg.)[2]	mg/l	8	10	10	11	8	9	9	13	9	9	10	9		10	8	13
pH (avg.)[3]	pH	6.9	6.9	6.9	6.9	6.9	6.8	6.8	6.8	6.8	6.8	6.8	6.8		6.8	6.8	6.9
OVERALL REMOVAL EFFICIENCY																	
cBOD[4]	%	97	97	98	97	98	98	98	98	98	98	98	98		98	97	98
TSS[4]	%	97	97	98	97	98	98	99	98	98	98	98	96		98	96	99

[1] Effluent limitations for cBOD = 25 mg/L average monthly, 40 mg/L average weekly
[2] Effluent limitations for TSS = 30 mg/L average monthly, 45 mg/L average weekly
[3] Effluent limitations for pH = instantaneous minimum: 6.0, instantaneous maximum 9.0
[4] The average monthly percent removal of cBOD and TSS shall not be less than 85%

3. PRETREATMENT PROGRAM – GENERAL INFORMATION

Through its Pretreatment Program, EBMUD regulates process wastewater discharges from identified industrial users (IUs) that handle pollutants of concern. Pollutant control mechanisms include the issuance of wastewater discharge permits with general provisions and site-specific requirements. Descriptions of EBMUD's permit categories are provided in Section 3.2. In 2022, EBMUD conducted an industrial user survey of facilities operating in the metal works industries. A total of 13 metal works facilities were inspected, of which two businesses were issued a zero discharge permit to regulate their categorical process.

In 2022, there were no significant changes or planned modifications to EBMUD's Pretreatment Program including its legal authority, local limits, monitoring/inspection program and frequency, enforcement protocol, administrative structure, resource requirements, or funding mechanism. EBMUD made some changes to the staffing structure to increase the supervisory and staff focus for the Private Sewer Lateral Program and the Pretreatment Program. These changes will provide closer collaboration between field and administrative staff and will not impact the overall operation of the Pretreatment Program in any significant manner. These changes are described below in Section 3.1. EBMUD is also conducting a review of the Local Limits, which is discussed below in Section 3.6. Detailed information on the permitted accounts and monitoring is provided in Section 4.

3.1 Pretreatment Program Staffing and Budget

The EBMUD Wastewater Department is organized into four Divisions: Wastewater Treatment, Wastewater Engineering, Laboratory Services, and Environmental Services. The Environmental Services Division is now organized into the following three sections:

- **Source Control:** Prior to 2022, the Wastewater Department had two sections supporting the Pretreatment Program: Field Services and Industrial Discharger Sections. The Field Services Section supported the Industrial Discharger and Private Sewer Lateral programs by performing site inspections and sampling. The Industrial Discharger Section worked with industries, commercial businesses, and residences to implement the Pretreatment and Pollution Prevention Programs. In 2022, Industrial Discharger and Field Services Sections combined to become the Source Control Section, which consists of two different job classifications (field inspector and administrative professionals) with four Wastewater Control Representatives, four Wastewater Control Inspector IIs, one Senior Wastewater Control Inspector, and one Senior Administrative Clerk. The Source Control Section is responsible for administering EBMUD's Pretreatment and Pollution Prevention Programs. In 2022, due to a promotion, a new Supervisor was appointed to oversee the Source Control Section.
- **Private Sewer Lateral (PSL) Program: T**he Private Sewer Lateral Program Section implements the Regional Private Sewer Lateral Program, which mandates maintenance of private sewer laterals to reduce inflow and infiltration into the collection systems. In 2022, the section was formed from the Field Services and Industrial Discharger Sections with three Wastewater Control Representatives, six Wastewater Control Inspector IIs, two Senior Wastewater Control Inspectors, and two administrative clerks. In 2022, due to promotions and retirements, a new Supervisor was appointed to oversee the PSL Program

Section, two Wastewater Control Representatives and five Wastewater Control Inspector IIs were hired.

- **Resource Recovery (R2):** uses excess wastewater treatment capacity to provide an environmentally friendly and economical disposal alternative for customers, and to increase the MWWTP's production of biogas that is used for power generation. Due to retirements and promotions, three positions were filled on a permanent basis in 2022: Wastewater Control Representative, Senior Environmental Health and Safety Specialist, and Associate Civil Engineer.

EBMUD's Pretreatment Program budget is funded through permit holder fees and charges, including an annual permit fee, monitoring/testing fees, and violation follow-up fees. The wastewater rates, fees, and charges are available on the EBMUD website: http://www.ebmud.com/wastewater/rates-and-charges/. The Environmental Services Division budget for fiscal year 2023 (July 1, 2022 to June 30, 2023) is summarized in Table G. The budget specifically for pretreatment program activities is approximately 15 percent of the total Environmental Services Division budget.

Table G: Environmental Services Division Budget – Fiscal Year 2023

Expenditures	Dollars ($)
Personnel	$6,170,000
Equipment, Operations & Maintenance, Training & Travel	$291,000
Contracted Services	$126,000
Total	**$6,587,000**

3.2 Permit Classifications

EBMUD issues and maintains the permit types as shown below in Table H. See Section 4 for a detailed breakdown of the monitoring and violations for each permit type.

Table H: Permit Classifications and Number of Permits

Permit Classification	Permit Description	No. Permits as of 12/31/2022[1]
Categorical Industrial Users (CIUs) • CIU >5,000 gpd • CIU – Middle Tier ≤5,000 gpd	Industries that discharge process wastewater from specific industry categories subject to Federal categorical pretreatment standards	4
Non-Categorical Significant Industrial Users	Industries that are exempt from the Categorical Pretreatment Standards, but use >25,000 gallons per day	5
Non-Significant Categorical Industrial Users (NSCIUs)	Categorical industrial users that never discharge more than 100 gallons per day of total categorical wastewater	1
Zero Discharger (ZD)	Categorical industrial users that never discharge process wastewater	21

[1] One CIU, and three Middle Tier CIUs. One Middle Tier CIU and three zero discharge permits were added in 2022. See Table L for CIUs that were added in 2022.

3.3 Inspection and Sampling Procedures

In 2022, there were no changes to EBMUD's inspection and sampling procedures for the Pretreatment Program. This section outlines the types of inspections and sampling performed by EBMUD in support of the pretreatment program.

3.3.1 Inspection/Monitoring/Sampling Frequencies

Inspection/monitoring/sampling frequencies depend on compliance history of the discharger, relative consistency of pollutant concentrations in the discharge, discharge volume, and the nature of the pollutants discharged. Table I describes the industrial user types and the respective minimum inspection/monitoring frequencies.

Table I: EBMUD Minimum Inspection/Monitoring Frequency

Discharger Category	Industrial User Self-Monitoring	EBMUD Minimum Inspection/Monitoring Requirements
SIUs: • CIU >5,000 gpd • Non-Categorical SIU • CIU – Middle Tier ≤5,000 gpd	 • Once every six months • Once every six months • Once per year	 • Once per year • Once per year • Once every two years
Zero Discharge/NSCIU ≤100 gpd	Not applicable	Once every 5 years

3.3.2 Industrial User (IU) Inspections

The IU inspection includes a comprehensive review of the types of processes, wastes generated and method(s) of waste disposal. The primary concerns are water use, process wastewater discharge, identification of a representative sample location(s), and potential of hazardous materials entering the sanitary sewer. Pollution prevention opportunities may be discussed, in addition to identifying environmental cross-media issues.

The following activities are typically conducted by EBMUD inspectors in association with an IU inspection:

Pre-Inspection

1. Review documents in the IU file (including the Inspection Program document, the permit, the permit review notes, and previous inspection reports) and coordinate with the assigned Wastewater Control Representative.
2. Gather equipment according to the requirements of the sampling program established for the facility. The Inspection Program will specify the equipment and any unique materials needed.

Inspection

1. Take grab samples and install autosampler upon arrival.
2. Read water service meters and sub-meters.

3. Interview the facility contact to determine the level of production, types of products and wastes currently being generated, the status of any pretreatment system, and to answer specific questions listed in the inspection program.
4. Conduct a walk-through of the facility with the facility contact. Verify information obtained in the interview.
5. Observe facility operations.
   - Compare observations with information in the permit and from the contact interview.
   - Verify plant layout and update as necessary.
   - Observe wastewater flow and make visual assessment of discharge quality.
   - Evaluate the potential for accidental spills to wastewater stream. Every two years, conduct Slug Control Plan Evaluation to determine if the facility needs a Slug Control Plan.
   - Document secondary water uses such as boilers, air scrubbers, cooling water, and clean-up.
   - Review private meter calibration records.
6. Inspect Pretreatment System. Determine if:
   - System is functioning
   - Necessary chemicals are in inventory
   - Routine preventive maintenance procedures are being performed and by whom
   - A contingency plan is in place in the event of a treatment system failure
   - Operating records are up to date
7. Review self-monitoring procedures with responsible personnel annually, including sampling frequency, sampling methods, sampling location, and chain-of-custody.

Post-Inspection

1. Complete a sample description form and deliver samples to the laboratory for analysis with the chain-of-custody record.
2. Complete an inspection report detailing the inspection results.
3. Inform the assigned Wastewater Control Representative of any unusual conditions or observations, including the need for a Slug Control Plan.

3.3.3 ZD and NSCIU Inspections

Categorical ZD facilities are inspected to verify that there is no discharge of regulated process wastewater to the sanitary sewer. The methods of recycling and/or off-hauling of process wastewater are reviewed during the inspection. Sampling is performed only when discharge violations are suspected or as follow-up to a permit violation.

NSCIUs discharging no more than 100 gallons per day of regulated wastewater and ZDs are monitored at the same frequency. These IUs are required to submit an annual discharge prevention compliance report for EBMUD's evaluation of their discharge status. In addition, EBMUD conducts facility inspections at each NSCIU and ZD at least once every five years. To qualify for this reduced monitoring frequency, the discharger must have complied with all applicable categorical pretreatment standards and requirements and submitted the certification statement required in 40 CFR 403.12 (q). Additionally, ZDs must not have discharged any

federally regulated process wastewater and NSCIUs must not have discharged more than 100 gallons per day.

The following activities are typically conducted by EBMUD inspectors in association with ZD and NSCIU inspections:

Pre-Inspection

1. Collect information from the Inspection Program document, permit, previous inspection reports, and the assigned Wastewater Control Representative.
2. Review water consumption history from Customer Information System to determine water usage and compare with facility's stated water uses such as sanitary, non-contact cooling water, and boiler blow-down wastewater.

Inspection

1. Interview the facility contact to determine if there is discharge of regulated process wastewater or wastewater of local toxic concern to the sanitary sewer.
2. Ask about the level of production, types of products and wastes being generated, status of pretreatment system, and the method of wastewater disposal.
3. Conduct a walk-through of the facility with the facility contact.
4. Observe other operating conditions. Observations may be forwarded to other agencies.
5. Determine if appropriate safeguards are in place to ensure process wastewater is not discharged to the sanitary sewer. Safeguard examples include permanent sealing of the sanitary sewer and floor drains, installation of berms, and capping or removal of process wastewater discharge pipes.
6. Inspect facility for presence of containers, hoses or other conveyances which may be used for the temporary discharge of process wastewater to the sanitary sewer.
7. Determine if there have been any changes to the premises or operations which may result in discharge of process wastewater.
8. Request and review manifests for off-hauled waste.

Post-Inspection

1. Complete the Inspection Report detailing the inspection results.
2. Inform the assigned Wastewater Control Representative of any unusual conditions or observations.

3.3.4 Violation Follow-Up Inspections

A Violation Follow-Up Inspection is performed after a discharge violation is found during an inspection, a self-monitoring event, or an EBMUD sampling event. The Violation Follow-Up Inspection focuses on specific areas associated with the cause of the violation. In addition, the Violation Follow-Up Inspection verifies the corrective actions reported by the facility, as well as adherence to any compliance time schedules or incremental remedial measures. The account is charged a Violation Follow-up Inspection Fee plus analytical charges.

3.4 Resource Recovery (R2) Program

EBMUD's R2 Program manages the disposal of permitted trucked materials to EBMUD's MWWTP. Since its inception, the R2 Program has established 600 customer accounts; currently 275 accounts are active, holding 451 active waste disposal permits. The R2 Program uses available excess capacity at the MWWTP. It provides a cost-effective, economically-sound disposal alternative for customers, it increases the MWWTP's production of methane gas that is used to generate renewable electricity used at the MWWTP, with excess electricity sold to the Port of Oakland.

Materials hauled to the MWWTP are non-hazardous and include residential and commercial septage; food and beverage industry wastes and wastewaters, including winery and brewery, dairy, bakery, vegetable oil, and high total dissolved solids waste, animal process waste, food grade fats, oils, and greases; municipal – industrial water and wastewater wastes; sludges; groundwater; and stormwater. Exhibit A summarizes trucked materials and volumes delivered in 2022.

3.4.1 R2 Audit Program

The materials acceptance and control process includes material profiling, site inspections, sampling and analysis, and comparison with waste acceptance criteria. Trucked materials must meet a rigorous review process prior to acceptance to ensure compliance with multiple criteria including: workplace health and safety issues, plant process impact, NPDES permit, air permits, recycled water quality, and biosolids regulations. Upon issuance of a permit, EBMUD conducts first load confirmation sampling, and periodic audit sampling.

The audit program supplements routine compliance efforts that include required sampling of first deliveries to R2 receiving facilities (referred to as a Trucked 1st or "T-first" sample) and new driver site orientations. The site orientations include an introduction to plant hazards, rules of conduct, and specific discharge instructions for each disposal location. Audits are conducted by wastewater staff and typically include review of a truck driver's paperwork (permit number, hauling company name, waste generator name, volume of tanker, and description of waste characterization), physical inspection of waste, and random or targeted truck audit sampling. In addition to random audits, specific permitted wastes, drivers, or companies are audited more frequently to ensure compliance.

3.5 Enforcement Procedures

3.5.1 Legal Authority

In 2022, there were no changes to EBMUD's enforcement procedures for the Pretreatment Program. EBMUD implements and enforces its approved Pretreatment Program in accordance with 40 CFR 403, RWQCB Order No. R2-2020-0024, and EBMUD's Wastewater Control Ordinance. The Ordinance establishes regulations for the control, interception, treatment, and disposal of wastewater. In addition, it provides for enforcement and penalties for violations of the established regulations. The Ordinance is available on EBMUD's website (www.ebmud.com).

EBMUD's established Enforcement Response Plan (ERP) remains in effect. The ERP provides guidance for enforcement of Federal regulations and Ordinance provisions. It has been updated to address August 2013 enforcement enhancements to EBMUD's Wastewater Control Ordinance. EBMUD sent the updated ERP to the Regional Water Board on September 4, 2015, the Regional Board had no comments, and EBMUD adopted the ERP on December 9, 2015. Exhibit B summarizes EBMUD's current enforcement response procedures.

3.6 Local Limits

In 2022, there were no changes to EBMUD's local limits. EBMUD's current local discharge limits can be found in the Ordinance, Title II, Section 3 (a) through (f) and are shown in Exhibit C. In accordance with EBMUD's letter submitted to the RWQCB on April 19, 2021; EBMUD will conduct a local limits review in fiscal year 2023, completing the analysis by June 30, 2023.

3.7 Other Pollutant Reduction Activities and Other Subjects

This report includes all information pertinent to EBMUD's Pretreatment Program for the reporting period. EBMUD's pollution reduction activities for 2022 can be found in the Annual Pollution Prevention Report (submitted separately).

4. PRETREATMENT PROGRAM - INDUSTRIAL USER INFORMATION

4.1 Updated List of Regulated Significant Industrial Users (SIUs)

Table J and Table K list all of the SIU facilities with active EBMUD permits as of December 31, 2022. Table L lists SIUs that were added in 2022.

Table J: Categorical List

Company Name[1]	**Permit No.**	**Address**	**City**	**Reason SIU**[2]
Fryer Industries Inc/ dba Dougco – Metal Finishing	26414503	1073 34th St.	Oakland	40 CFR 433.17
Qualawash Holdings, LLC (formerly Harkrader Trucking) – Transportation Equipment Cleaning	50066572	9957 Medford Ave.	Oakland	40 CFR 442.15
Scientific Platers, Inc. – Metal Finishing	14322574	9809 Kitty Ln.	Oakland	40 CFR 433.17
ERG Materials and Aerospace Corporation – Metal Finishing	15583800	964 Stanford Ave.	Emeryville	40 CFR 433.17

[1] No discharge limits were developed using the Combined Waste Stream formula for any of the four CIUs
[2] Exhibit D lists the applicable Federal Categorical Standards for each of the four CIUs

Table K: Non-Categorical List

Company Name & Business Description	**Permit No.**	**Address**	**City**	**Reason SIU**[1]
Aramark Uniform Services – Industrial Laundry	03300801	330 Chestnut St.	Oakland	>25,000 gpd
Safeway Beverage Plant – Carbonated Beverage Manufacturer	05900451	1921 San Joaquin St.	Richmond	>25,000 gpd
Schnitzer Steel Products – Scrap Metal Recycler	77783210	1101 Embarcadero West	Oakland	>25,000 gpd
SVC Manufacturing – Gatorade Beverage Manufacturer	50367682	5625 International Blvd.	Oakland	>25,000 gpd
Takara Sake – Wine and Spirit Manufacturer	10600278	708 Addison St.	Berkeley	>25,000 gpd

[1] Exhibit C lists the applicable local limits for all Non-Categorical SIUs

4.2 Baseline Monitoring Report (BMR) Update

One new Categorical Industrial User (CIU) was added to the Pretreatment Program in 2022. Table L lists the CIU added to the Pretreatment Program in 2022 and summarizes the status of the BMR.

Table L: CIU Permits Added in 2022

Company Name	Permit No.	Address	CIU Notified of BMR Requirement	BMR Due	BMR Submitted
ERG Materials and Aerospace Corporation – Metal Finishing	15583800	964 Stanford Ave. Emeryville	7/31/2019	1/27/2020	3/6/2020[1]

[1] ERG did not begin discharging process wastewater until 2022.

4.3 July-December Semiannual Data

The Semiannual Pretreatment Data for the period of July 2022 through December 2022 was prepared in accordance with Order No. R2-2020-0024, NPDES Permit No. CA0037702 and is included in Exhibit E.

4.4 Public Participation Summary

As required by 40 CFR 403.8(f)(2)(viii), EBMUD publishes, in the appropriate local newspaper, a list of industrial users that at some point during the reporting year were in Significant Noncompliance (SNC) with applicable Pretreatment requirements. Exhibit F includes a copy of the public notice that was published in the Alameda Journal, Alameda Times-Star, Berkeley Voice, El Cerrito Journal, Oakland Tribune, Piedmonter, and West County Times on January 27, 2023.

4.5 Compliance Activities for SIU Regulated Facilities

See Exhibit G through Exhibit I for a summary of the compliance activities for SIUs.

Exhibits

Exhibit A: Resource Recovery Trucked Materials, Volumes, and Descriptions

Category	Material Type	Description	Gallons in 2022
Septage	Septage	Domestic sewage from septic tanks and portable toilets.	26,350,306
Sludge	Potable water treatment sludge	Sludge from drinking water treatment facilities, including well head treatment: sludge from the various processes used to remove such impurities as sediment, bacteria, algae, and other microorganisms.	7,099,810
	Evaporation Pond sludge	Sludge from lagoon cleaning, containing organic residues from wine making and other food processing wastes.	
	Municipal wastewater sludge	Sludge from municipal anaerobic digester cleaning, primary or secondary sludge tank or treatment pond cleaning or diversion, consistent with the MWWTP's sludges.	
	Potable water reservoir bottoms	Solids from drinking water reservoirs, contains contaminants consistent with the MWWTP's influent waste stream.	
Food and animal processing	Food and beverage processing waste	High strength waste from the manufacturing of food and beverages. Includes pre-sorted ground food waste, waste or expired product, wash down water by-products, food-grade cleaning products, off-spec ingredients (sugars), and dairy process by-products.	84,961,518
	Winery processing (high strength) waste	High strength winery processing wastewater, for example, lees. Waste contains contaminants consistent with the MWWTP's influent waste stream.	
	Rendering waste	Animal (beef, chicken, fish, and pork) residuals, which have been heated or chemically treated in accordance with California Department of Food and Agriculture requirements.	
	Poultry processing waste	High strength waste consisting of chicken and turkey blood. Turkey and chicken lung waste contains some pathogens in quantities similar to the MWWTP's influent waste stream.	
	Beef, sheep, and swine processing waste	High strength waste consisting of beef, sheep, and swine blood. Waste contains some pathogens similar to the MWWTP's influent stream.	
	Alkaline hydrolysis	High strength waste consisting of dissolved organic matter from expired animals.	

Industrial	Non-contact process water	Non-contact process cooling water from equipment testing, cleaning or cooling towers. Waste contains contaminants consistent with the MWWTP's influent waste stream.	94,388,678
	Rinse water	Wash water from interior or exterior of tanks used in the storage and treatment of potable water, or from boiler and/or cooling tower maintenance, or from tank cleaning for product, process, or waste storage tanks. Waste contains contaminants consistent with the MWWTP's influent waste stream.	
	Water/wastewater treatment waste	Waste product from water or wastewater treatment plants, such as polymer or sodium hypochlorite. Waste from pretreated car wash water and water treatment residuals. Waste contains chemicals used in the wastewater treatment plant process. Reverse osmosis brine wastewater from water treatment plants.	
	Waste from sewer line cleaning	Waste from sanitary sewer collection line cleaning. Waste contains contaminants consistent with the MWWTP's influent waste stream.	
	Winery processing (low strength) waste	Low strength winery processing wastewater. Waste contains contaminants consistent with the MWWTP's influent waste stream.	
	Bridge construction waste	Seawater, drilling slurry, and non-hazardous concrete wash water. Contains bay mud, seawater, and contaminants consistent with the MWWTP's influent waste stream.	
	Biotech processing waste	Bioengineered buffer process wastewaters (non-categorical) from pharmaceutical biotech companies.	
	Final rinse water from biodiesel processing	Wastewater from the production of biodiesel fuels that is captured in the final step multi-rinse process.	
	Groundwater/ Stormwater	Groundwater and stormwater from construction sites, facility stormwater collection systems, installation of monitoring wells, and existing monitoring wells. Waste contains contaminants consistent with the MWWTP's influent waste stream.	
Fats, oil, and grease (FOG)	FOG	Restaurant and food handling facilities grease trap and interceptor waste.	15,589,635

Exhibit B: Enforcement Response Plan Summary

<table>
<tr><th colspan="2">Informal Action</th></tr>
<tr><td colspan="2">

Informal Notice
Informal Meeting
Notice of Violation/Follow-Up Fees:[1]

Reporting/Non-Discharge Violation: Stage One, $780
Discharge Violation, Stage Two: $1,720*
Discharge Violation under Director’s Order, Stage Three: $3,480*

*does not include testing fees
</td></tr>
<tr><th colspan="2">Formal Action

Administrative</th></tr>
<tr><td>Director’s Orders

Schedule of Remedial or Preventive Measures
Cease and Desist Orders
Facility Damage Cost Recovery
Termination of Service
</td><td>Director’s Enforcement Remedies and Penalties

Civil Liability Complaints
Civil Liability Penalties

Failure to Submit Report: $1,000/day
Hazardous Waste Discharge/Reporting Falsified Information: $5,000/day
Discharge in Violation of Order/Prohibition: $10/gallon

</td></tr>
<tr><th colspan="2">Formal Action

Judicial</th></tr>
<tr><td>Criminal Penalties

Intentional Discharge in Violation of Director’s Order Resulting in Pollution: Misdemeanor, $1,000/day
Reporting Falsified Information/Tampering with Monitoring Devices: $25,000 Fine and/or 6 Months Imprisonment
</td><td>Civil Enforcement Remedies and Penalties

Civil Enforcement Penalties

Failure to Comply with EBMUD Order: $10,000/day
Intentional or Negligent Pollution under EBMUD Order: $25,000/day

Injunction

Discharge in Violation of Ordinance Causes/Threatens to Cause Pollution
Failure to Submit Required Report
Failure to Allow EBMUD Access to Facility

</td></tr>
</table>

[1] Fees effective July 1, 2022

Exhibit C: Local Limits for Non-Categorical Significant Industrial Users

Parameter	Daily Maximum (mg/L)
Arsenic	2
Cadmium	1
Chromium (total)	2
Copper	5
Iron	100
Lead	2
Mercury	0.05
Nickel	5
Silver	1
Zinc	5
Parameter	**Instantaneous Maximum (mg/L, unless noted)**
Chlorinated Hydrocarbons (total identifiable)[1]	0.5
Cyanide	5
Oil and Grease	100
pH (in S.U.)[2]	not less than 5.5[3]
Phenolic compounds	100
Temperature[4]	150F

[1] Total Identifiable Chlorinated Hydrocarbons (TICH) - The sum of the concentrations of all quantifiable values equal to or greater than the detection limit for all chlorinated hydrocarbons identified by EPA Method 624.

[2] S.U. – Standard Units

[3] Wastewater with pH greater than or equal to 12.5 S.U. (40 CFR 261.22(a)(1)) shall not be discharged.

[4] 150F (65.5C), or any thermal discharge which as a result of temperature and/or volume causes the influent of the wastewater treatment plant to exceed 104F (40C).

Exhibit D: Wastewater Standards for Categorical Industrial Users

Metal Finishing Category-40 CFR 433.17, New Source				Limits (mg/L)			
	Permit	BMR	BMR		Federal		EBMUD
Industry Name	Exp. Date	Due Date	Accepted	Parameter	Daily Maximum	Maximum Monthly Average	Local
Fryer Ind. dba Dougco	6/30/2025	1/15/1990	2/8/1990	Arsenic	-	-	2
Scientific Platers	6/30/2025	12/3/1997	12/23/1997	Cadmium	0.11	0.07	1
ERG	7/1/2027	1/27/2020	3/06/2020	Chromium	2.77	1.71	2
				Copper	3.38	2.07	5
				Cyanide	1.2	0.65	5
				Iron	-	-	100
				Lead	0.69	0.43	2
				Mercury	-	-	0.05
				Nickel	3.98	2.38	5
				Oil and Grease	-	-	100
				pH	-	-	Not <5.5
				Phenols	-	-	100
				Silver	0.43	0.24	1
				Temperature	-	-	150°F
				TICH	-	-	0.5
				TTO	2.13	-	-
				Zinc	2.61	1.48	5

Transportation Equipment Cleaning Category - 40 CFR 442.15				**Limits (mg/L)**		
Industry Name	**Permit Exp. Date**	**BMR Due Date**	**BMR Accepted**	**Parameter**	**Federal Daily Maximum**	**EBMUD Local**
Qualawash Holdings, LLC (Formerly Harkrader Trucking)	5/26/2026	**	**	Arsenic	-	2
** Qaulawash Holdings, LLC was not required to submit a BMR. All information required in a BMR was submitted by Harkrader Trucking in past periodic reports and permit applications.				Cadmium	-	1
				Copper	0.84	5
				Chromium	-	2
				Cyanide		5
				Iron	-	100
				Lead	-	2
				Mercury	0.0031	0.05
				Nickel	-	5
				Oil and	26	100
				pH	-	Not<5.5
				Phenols		100
				Silver	-	1
				Temperature	-	150°F
				TICH	-	0.5
				Zinc	-	5

Exhibit E: Compliance Summary (inclusive of Jul-Dec Semiannual Data)

Significant Industrial User - Non-categorical (Local)									
Facility Name, Permit Number and Address	**Semi-Annual Compliance Status[1]**				**Date of Violation**	**Sample By POTW/IU[2]**	**Parameter**	**Result(s) (s.u.)**	**Local Discharge Limit (s.u.)**
	Current		**Previous**						
	Q4	**Q3**	**Q2**	**Q1**					
	2022	**2022**	**2022**	**2022**					
SVC Manufacturing 5625 International Blvd. Oakland, CA 94621	IC	C	C	C	12/27/2022	IU	pH	4.9-5.5	Not less than 5.5
Comments on Follow-up, Corrective, or Enforcement Action Taken	SVC Manufacturing (SVC) is a Non-Categorical SIU subject local pH limits. SVC discharges more than 25,000 gpd. SVC performs continuous pH monitoring to control pH levels in compliance with federal and local limits. On December 28, 2022, SVC discharged approximately 8,000 gallons of untreated process wastewater with pH ranging from 4.9 s.u. to 5.5 s.u. to the sanitary sewer due to equipment malfunctions. SVC submitted a technical report on January 3, 2023 describing the incident and outlined steps for how to prevent future occurrences. EBMUD issued a violation notice dated January 3, 2023 regarding non-compliance and assessed a Stage 2 violation fee of $1,720.								

[1] C = Consistent compliance; IC = Inconsistent Compliance

[2] POTW = Publicly Owned Treatment Works; IU = Industrial User

Significant Industrial User - Categorical									
Facility Name, Permit Number and Address	**Semi-Annual Compliance Status[1]**				**Date of Violation**	**Sample By POTW/IU[2]**	**Parameter**	**Result(s) (mg/L)**	**Federal Discharge Limit (mg/L)**
	Current		**Previous**						
	Q4	**Q3**	**Q2**	**Q1**					
	2022	**2022**	**2022**	**2022**					
Scientific Platers, Inc. 9809 Kitty Lane Oakland, CA 94603	IC	C	C	C	11/22/2022	POTW	Cu	3.51	3.38
Comments on Follow-up, Corrective, or Enforcement Action Taken	Scientific Platers, Inc. is a metal finishing shop subject to 40 CFR 433. On November 22, 2022 EBMUD inspectors collected a flow-proportional composite of the process wastewater discharge at Scientific Platers, Inc. The copper result of 3.510 mg/L exceeded the Daily Maximum limit of 3.38 mg/L. The District issued a violation notice dated December 14, 2022 and assessed a Stage 2 violation fee of $1,720. EBMUD collected violation follow-up samples on December 20, 2022 which demonstrated results were in compliance with both local and federal limits. Scientific Platers sent a corrective action report to EBMUD dated December 22, 2022 in which Scientific Platers had a technician complete maintenance and calibration work on the waste treatment system to ensure proper operation.								

[1] C = Consistent compliance; IC = Inconsistent Compliance

[2] POTW = Publicly Owned Treatment Works; IU = Industrial User

Non-Significant Categorical Industrial User – Zero Discharger									
Facility Name, Permit Number and Address	**Semi-Annual Compliance Status[1]**				**Date of Violation**	**Sample By POTW/IU[2]**	**Parameter**	**Result(s) (mg/L)**	**Local/Federal (40 CFR 413.54 and 413.64) Discharge Limits (mg/L)**
	Current		**Previous**						
	Q4	**Q3**	**Q2**	**Q1**					
	2022	**2022**	**2022**	**2022**					
Monsen Silversmiths 3370 Adeline Street, Berkeley CA 94703	SNC	C	C	C	10/7/2022	POTW	Cu Ag Pb	36.7 6.21 3.16	5.0/NA 1.0/NA 2.0/0.6
Comments on Follow-up, Corrective, or Enforcement Action Taken	Monsen Silversmiths is a Zero Discharger subject to federal and local limits for metals. On October 6, 2022, during a routine inspection EBMUD noticed a piece of plywood covering a low spot in the floor near the plating room. Upon removal of the plywood and further inspection, EBMUD discovered a floor drain with liquid in the p-trap with buckets and a funnel sitting on a table adjacent to the floor drain. On October 7, 2022, EBMUD collected a sample from the p-trap and had it analyzed for metals. Sample results showed concentrations of copper (36.7 mg/L) and silver (6.21 mg/L) that exceeded local limits and lead (3.16 mg/L) which exceeded local and federal limits. Monsen Silversmiths also failed to submit Annual Discharge Prevention Compliance Reports within 45-days of the deadline. On November 21, 2022, Cease and Desist (CDO) Order No. 2022-1 was issued to Monsen Silversmiths and a Stage 2 violation follow-up fee of $1,720 including sampling fees in the amount of $224 was imposed. The CDO required Monsen Silversmiths to submit a corrective action report by December 22, 2022. In a follow-up letter dated December 28, 2022, EBMUD imposed a Stage 3 violation follow-up fee of $3,480 for failure to submit a corrective action report and requested Monsen Silversmiths to submit the required corrective action report and pay all outstanding fees no later than January 19, 2023. EBMUD is continuing enforcement action in 2023.								

[1] C = Consistent compliance; SNC = Significant Noncompliance

[2] POTW = Publicly Owned Treatment Works; IU = Industrial User

Exhibit F: Public Notice of Noncompliance

Alameda Journal
1101 Marina Village Parkway
Suite 201
Alameda, CA 94501
510-262-2740

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

Alameda Journal

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Alameda Journal, a newspaper published in the English language in the City of Alameda, County of Alameda, State of California.

I declare that the Alameda Journal, is a newspaper of general circulation as defined by the laws of the State of California, as determined by the order of the Superior Court of the County of Alameda, dated August 25, 1992, in the action entitled "In the Matter of the Petition of the Alameda Journal to Have the Standing of the Alameda Journal as a Newspaper of General Circulation Ascertained and Established," Case Number 702515-6. Said order provides that: "Petitioner's prayer for an order ascertaining and establishing The Alameda Journal as a newspaper of general circulation...within the City of Alameda, County of Alameda, State of California, is granted." Said order has not been revoked.

I declare that the notice, a printed copy of which is annexed hereto, has been published in each regular and entire issue of the Alameda Journal and not in any supplement thereof on the following dates, to-wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2023.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023
Office of the Secretary

Berkeley Voice
510-723-2850

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

Berkeley Voice

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Berkeley Voice, a newspaper published in the English language in the City of Berkeley, County of Alameda, State of California.

I declare that the Berkeley Voice is a newspaper of general circulation as defined by the laws of the State of California, as determined by the order of the Superior Court of the County of Alameda, dated September 3, 1991, in the action entitled "In the Matter of the Petition of the Berkeley Voice to Have the Standing of the Berkeley Voice as a Newspaper of General Circulation Ascertained and Established," Case Number 588221-2. Said order provides that: "Petitioner's prayer for an order ascertaining and establishing The Berkeley Voice as a newspaper of general circulation...within the City of Berkeley, County of Alameda, State of California, is granted." Said order has not been revoked.

I declare that the notice, a printed copy of which is annexed hereto, has been published in each regular and entire issue of the Berkeley Voice and not in any supplement thereof on the following dates, to-wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2023.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023
Office of the Secretary

El Cerrito Journal
1160 Brickyard Cove
Suite 200, Rm 15
Richmond, CA 94801
510-262-2740

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

El Cerrito Journal

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the El Cerrito Journal, a newspaper published in the English language in the Town of El Cerrito, City of Richmond, County of Contra Costa, State of California.

I declare that the El Cerrito Journal is a newspaper of general circulation as defined by the laws of the State of California as determined by court decree dated October 4, 1991, Case Number C91-03084. Said decree states that the El Cerrito Journal is adjudged to be a newspaper of general circulation for the Town of El Cerrito, City of Richmond, County of Contra Costa and State of California. Said order has not been revoked.

I declare that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2023.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023
Office of the Secretary

r.6P31G-02/17/17

1

Montclarion
1901 Harrison St., Ste. 1100
Oakland, CA 94612
510-723-2850

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

Montclarion

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Montclarion, a newspaper published in the English language in the City of Oakland, Township of Brooklyn, County of Alameda, State of California.

I declare that the Montclarion is a newspaper of general circulation as defined by the laws of the State of California, as determined by the order of the Superior Court of the County of Alameda, dated March 10, 1950 in the action entitled "In the Matter of the Petition of the Montclarion to Have the Standing of the Montclarion as a Newspaper of General Circulation Ascertained and Established," Case Number 224574. Said order provides that: "Petitioner's prayer for an order ascertaining and establishing The Montclarion as a newspaper of general circulation...within the City of Oakland, Township of Brooklyn, County of Alameda, State of California., is granted." Said order has not been revoked.

I declare that the notice, a printed copy of which is annexed hereto, has been published in each regular and entire issue of the Montclarion and not in any supplement thereof on the following dates, to-wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2023.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023

Oakland Tribune
1901 Harrison St., Ste. 1100
Oakland, CA 94612
510-723-2850

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

Oakland Tribune

The Oakland Tribune

I am a citizen of the United States; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the Legal Advertising Clerk of the printer and publisher of The Oakland Tribune, a newspaper published in the English language in the City of Oakland, County of Alameda, State of California.

I declare that The Oakland Tribune is a newspaper of general circulation as defined by the laws of the State of California as determined by this court's order, dated December 6, 1951, in the action entitled In the Matter of the Ascertainment and Establishment of the Standing of The Oakland Tribune as a Newspaper of General Circulation, Case Number 237798. Said order states that "The Oakland Tribune is a newspaper of general circulation within the City of Oakland, and the County of Alameda, and the State of California, within the meaning and intent of Chapter 1, Division 7, Title 1 [§§ 6000 et seq.], of the Government Code of the State of California." Said order has not been revoked, vacated, or set aside.

I declare that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Rio Vista, California.
On this 27th day of January, 2023.

Public Notice Advertising Clerk

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/DT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

Piedmonter
510-262-2740

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

Piedmonter

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Piedmonter, a newspaper published in the English language in the City of Piedmont, County of Alameda, State of California.

I declare that the Piedmonter is a newspaper of general circulation as defined by the laws of the State of California, as determined by the order of the Superior Court of the County of Alameda, dated July 8, 1936, in the action entitled "In the Matter of the Petition of the Piedmonter to Have the Standing of the Piedmonter as a Newspaper of General Circulation Ascertained and Established," Case Number 140711. Said order provides that: "Petitioner's prayer for an order ascertaining and establishing The Piedmonter as a newspaper of general circulation...within the City of Oakland, County of Alameda, State of California, is granted." Said order has not been revoked.

I declare that the notice, a printed copy of which is annexed hereto, has been published in each regular and entire issue of the Piedmonter and not in any supplement thereof on the following dates, to-wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2027.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023
Office of the Secretary

1

West County Times
1160 Brickyard Cove
Suite 200, Rm 15
Richmond, CA 94801
(510) 262-2740

2006239

EAST BAY MUD
ATTN: ROBYN JOHNSON
MS 806
PO BOX 24055
OAKLAND, CA 94623

PROOF OF PUBLICATION

FILE NO. WW-2022 Significant Noncompliance

West County Times

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter.

I am the Principal Legal Clerk of the West County Times, a newspaper of general circulation, printed and published in the City of Walnut Creek, County of Contra Costa, 94598

And which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Contra Costa, State of California, under the date of August 29, 1978. Case Number 188884.

The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

01/27/2023

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 27th day of January, 2023.

Signature

Legal No. **0006728302**

EBMUD

NOTICE OF SIGNIFICANT WASTEWATER VIOLATIONS

Under United States Environmental Protection Agency (USEPA) General Pretreatment Regulations (40 CFR 403.8(f)(2)(viii)(A-H), the East Bay Municipal Utility District (EBMUD) is required to publish annually a list of industrial wastewater dischargers located within its service area who, during the previous calendar year, were in significant noncompliance with applicable federal and local pretreatment standards for their industry. The discharger that was in significant noncompliance for calendar year 2022 is listed below.

Monsen Plating and Silversmith
3370 Adeline Street
Berkeley, CA 94703

VIOLATION: Monsen Plating and Silversmiths was in significant noncompliance for failing to submit self-monitoring reports within 45 days of the deadline and for discharging process wastewater to the sanitary sewer that exceeded Technical Review Criteria for lead, copper and silver discharge limits.

ACTIONS TAKEN: EBMUD issued a Cease and Desist Order (Order No. 2022-1) on November 21, 2022. Monsen Plating and Silversmiths was required to submit a corrective action report to EBMUD stating all actions taken to comply with the requirements of the Order by December 22, 2022. Monsen Plating and Silversmiths did not provide the required corrective action report by the required due dates and EBMUD followed up with a second notice to comply with the Cease and Desist Order on December 28, 2022. EBMUD continues to work with Monsen Plating and Silversmiths to bring the facility into compliance.

PENALTIES: EBMUD assessed a stage two violation fee of $1,944 on November 21, 2022 and a stage three violation fee of $3,480 on December 28, 2022.

Posted: Friday, January 27, 2023
By: Acting Secretary of the District Dana R. Mims.
ATS/WCT/OT/AJ/MC/PM/BV/JL 6728302; Jan. 27, 2023

RECEIVED
FEB 06 2023
Office of the Secretary

Exhibit G: SIU Monitoring and Violations Summary

	2022 PERMIT SUMMARY[1]				EBMUD INSPECTIONS	SAMPLING EVENTS			VIOLATIONS			COMPLIANCE STATUS[4]				
	IN EFFECT 12/31/2022	N	CL	T		EBMUD	IU[2]	TOTAL	NO. OF VIOS	NO. OF NOVS[3]	FEES	C	IC	SNC	SCH	U
Categorical Industrial Users																
40 CFR 433 METAL FINISHING	3	1	0	0	4	4	1	5	1	1	$1,720	2	1	0	0	0
40 CFR 442 TRANSPORTATION EQUIPMENT CLEANING	1	0	0	0	1	1	0	1	0	0	$0	1	0	0	0	0
Sub-total for SIU-Categorical	*4*	*1*	*0*	*0*	*5*	*5*	*1*	*6*	*1*	*1*	*$1,720*	*3*	*1*	*0*	*0*	*0*
Non-Categorical Significant Industrial Users																
BCC 2080 BEVERAGE MANUFACTURE	3	0	0	0	4	5	48	53	1	1	$1,720	2	1	0	0	0
BCC 3300 PRIMARY METALS MANUFACTURING	1	0	0	0	2	2	2	4	0	0	$0	1	0	0	0	0
BCC 7218 INDUSTRIAL LAUNDRIES	1	0	0	0	1	2	4	6	0	0	$0	1	0	0	0	0
Sub-Total for SIU-Local	*5*	*0*	*0*	*0*	*7*	*9*	*54*	*63*	*1*	*1*	*$1,720*	*4*	*1*	*0*	*0*	*0*
Grand Totals	**9**	**1**	**0**	**0**	**12**	**14**	**55**	**69**	**2**	**2**	**$3,440**	**7**	**2**	**0**	**0**	**0**

[1] N – New (A permit that was NOT in effect during the previous reporting year); CL – Closed (A facility which no longer operates in the EBMUD SD-1 service area); T – Terminated (A permit which ceases to be in effect due to reasons such as business closure, business name change or regulated process change. In exceptional cases, the Director may terminate a permit for violation of the permit terms and conditions or the EBMUD Ordinance No. 311A-03 provisions. A discharger who has a permit terminated by the Director is required to apply for a new permit within 30 days of notice of termination.)

[2] No SIUs are required to submit a Total Toxic Organic (TTO) Management Plan

[3] All types of violations are included in NOVs

[4] C - Consistent compliance; IC - Inconsistent Compliance; SNC - Significant Noncompliance; SCH - On a Compliance Schedule, U - Unknown

Exhibit H: Significant Industrial User Compliance Activities – Categorical

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
40 CFR 433 - Metal Finishing										
ERG Materials and Aerospace Corporation 964 Stanford Oakland, CA 94608 Permit No. 15583800 Expires: 7/1/2027	4	C	0	1	0	0	0	$0	0	ERG was in consistent compliance during the 2022 reporting period.
	3	C	0	0	0	0	0	$0	0	
	2	C	1	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for ERG:			1	1	0	0	0	$0	0	

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
40 CFR 433 - Metal Finishing										
Fryer Industries Inc./dba Dougco 1073 34th Street Oakland, CA 94608 Permit No. 26414503 Expires: 6/30/2025	4	C	1	1	1	0	0	$0	0	Fryer was in consistent compliance during the 2022 reporting period.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Fryer:			1	1	1	0	0	$0	0	

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
Scientific Platers, Inc. 9809 Kitty Lane Oakland, CA 94603 Permit No. 14322574 Expires: 6/30/2025	4	IC	2	2	0	1	1	$1,720	0	Scientific Platers, Inc. is a metal finishing shop subject to 40 CFR 433. On November 22, 2022 EBMUD inspectors collected a flow-proportional composite of the process wastewater discharge at Scientific Platers, Inc. The copper result of 3.510 mg/L exceeded the Daily Maximum limit of 3.38 mg/L. The District issued a violation notice dated December 14, 2022 and assessed a Stage 2 violation fee of $1,720. EBMUD collected violation follow-up samples on December 20, 2022 which demonstrated results were in compliance with both local and federal limits. Scientific Platers sent a corrective action report to EBMUD dated December 22, 2022 in which Scientific Platers had a technician complete maintenance and calibration work on the waste treatment system to ensure proper operation.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Scientific Platers:			2	2	0	1	1	$1,720	0	
Totals for Metal Finishing:			**4**	**4**	**1**	**1**	**1**	**$1,720**	**0**	

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
40 CFR 442 - Transportation Equipment Cleaning										
Qualawash Holdings, LLC 9957 Medford Ave. Oakland, CA 96051 Permit No. 50066572 Expires: 5/26/2026	4	C	1	1	0	0	0	$0	0	Qualawash Holdings, LLC maintained consistent compliance in 2022.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Qualawash Holdings, LLC:			1	1	0	0	0	$0	0	
Totals for Transportation Equipment Cleaning:			**1**	**1**	**0**	**0**	**0**	**$0**	**0**	
Totals for Categorical SIUs:			**5**	**5**	**1**	**1**	**1**	**$1,720**	**0**	

[1] Calendar Quarter (4th Qtr is Oct – Dec)

[2] Compliance Status: C - Consistent compliance; IC - Inconsistent Compliance; SNC - Significant Noncompliance

[3] No Administrative Orders, Civil Actions, Criminal Actions, Orders to Restrict/Suspend Discharge to the Discharger or Orders to Disconnect the Discharge from Entering the Discharger were issued in 2022

[4] All types of violations are included in NOVs

Exhibit I: Significant Industrial User Compliance Activities - Non-Categorical

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 2080 - Beverage Manufacture										
SVC Manufacturing 5625 International Blvd. Oakland, CA 94621 Permit No. 50367682 Expires: 11/6/2023	4	IC	1	1	1	1	1	$1,720	0	SVC Manufacturing (SVC) is a Non-Categorical SIU subject to federal and local pH limits. SVC discharges more than 25,000 gpd. SVC performs continuous pH monitoring to control pH levels in compliance with federal and local limits. On December 28, 2022, SVC discharged approximately 8,000 gallons of untreated process wastewater with pH ranging from 4.9 s.u. to 5.5 s.u. to the sanitary sewer due to equipment malfunctions. SVC submitted a technical report on January 3, 2023 describing the incident and outlined steps for how to prevent future occurrences. EBMUD issued a violation notice dated January 3, 2023 regarding non-compliance and assessed a Stage 2 violation fee of $1,720.
	3	C	0	0	1	0	0	$0	0	
	2	C	1	1	0	0	0	$0	0	
	1	C	0	0	1	0	0	$0	0	
Totals for SVC Manufacturing:			2	2	3	1	1	$1,720	0	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
Safeway Beverage Plant 1921 San Joaquin Street Richmond, CA 94804 Permit No. 05900451 Expires: 3/31/2021	4	C	0	0	1	0	0	$0	0	Safeway maintained consistent compliance in 2022.
	3	C	1	2	0	0	0	$0	0	
	2	C	0	0	1	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Safeway Beverage:			1	2	2	0	0	$0	0	
Takara Sake 708 Addison Street Berkeley, CA 94710 Permit No. 10600278 Expires: 6/30/2025	4	C	1	1	4	0	0	$0	0	Takara Sake maintained consistent compliance in 2022.
	3	C	0	0	14	0	0	$0	0	
	2	C	0	0	13	0	0	$0	0	
	1	C	0	0	12	0	0	$0	0	
Totals for Takara Sake:			1	1	43	0	0	$0	0	
Totals for Beverage Manufacture:			**4**	**5**	**48**	**1**	**1**	**$1,720**	**0**	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
3300 - Primary Metals Manufacturing										
Schnitzer Steel Products 1101 Embarcadero West Oakland, CA 94604 Permit No. 02300311 Expires: 12/31/2023	4	C	1	1	0	0	0	$0	0	Schnitzer Steel Products maintained consistent compliance in 2022.
	3	C	0	0	1	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	1	1	1	0	0	$0	0	
Totals for Schnitzer Steel:			2	2	2	0	0	$0	0	
Totals for Primary Metals Manufacturing:			**2**	**2**	**2**	**0**	**0**	**$0**	**0**	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 7218 - Industrial Laundries										
Aramark Uniform Services 330 Chestnut Street Oakland, CA 94607 Permit No. 03300801 Expires: 11/9/2023	4	C	1	1	1	0	0	$0	0	Aramark Uniform Services maintained consistent compliance in 2022.
	3	C	0	1	1	0	0	$0	0	
	2	C	0	0	1	0	0	$0	0	
	1	C	0	0	1	0	0	$0	0	
Totals for Aramark Uniform Services:			1	2	4	0	0	$0	0	
Totals for Industrial Laundries:			**1**	**2**	**4**	**0**	**0**	**$0**	**0**	
Totals for Non-Categorical SIUs:			**7**	**9**	**54**	**1**	**1**	**$1,720**	**0**	

[1] Calendar Quarter (4th Qtr is Oct – Dec)

[2] Compliance Status: C - Consistent compliance; IC - Inconsistent Compliance; SNC - Significant Noncompliance

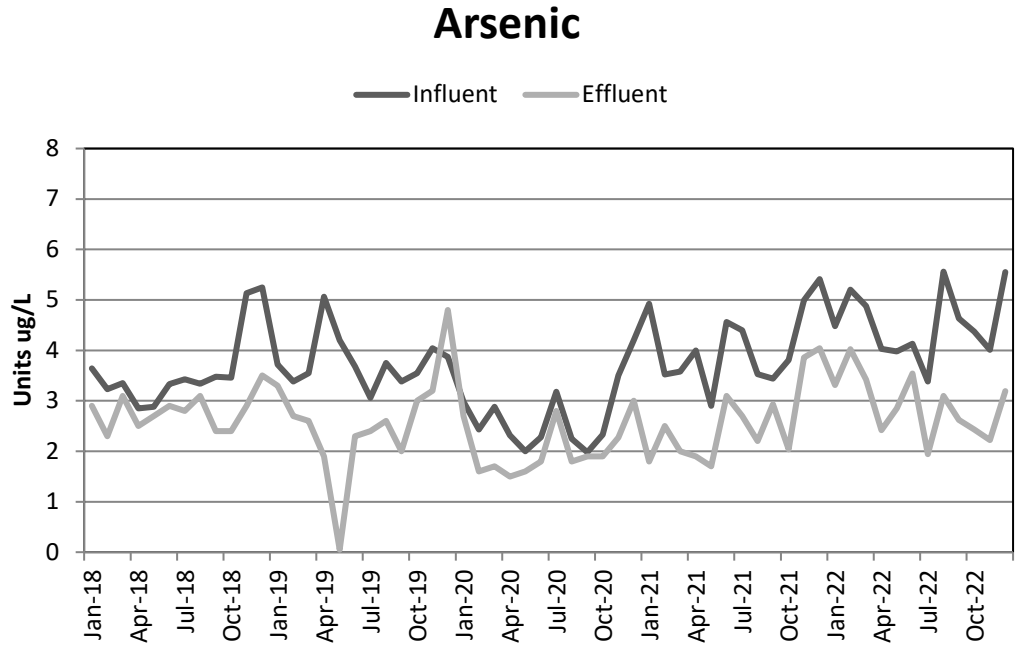
[3] No Administrative Orders, Civil Actions, Criminal Actions, Orders to Restrict/Suspend Discharge to the Discharger or Orders to Disconnect the Discharge from Entering the Discharger were issued in 2022

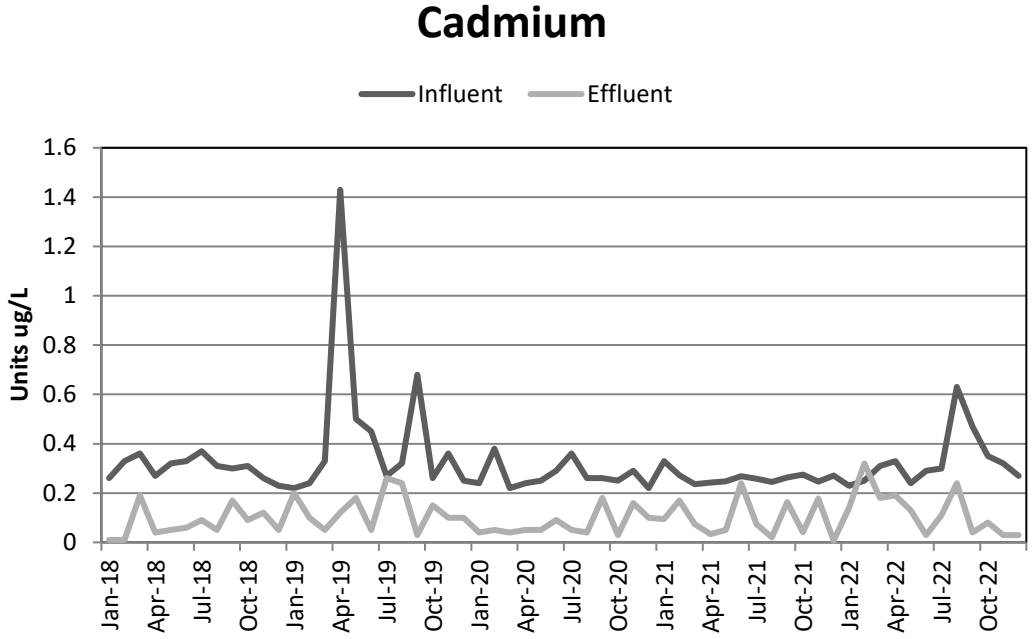
[4] All types of violations are included in NOVs

FIGURES

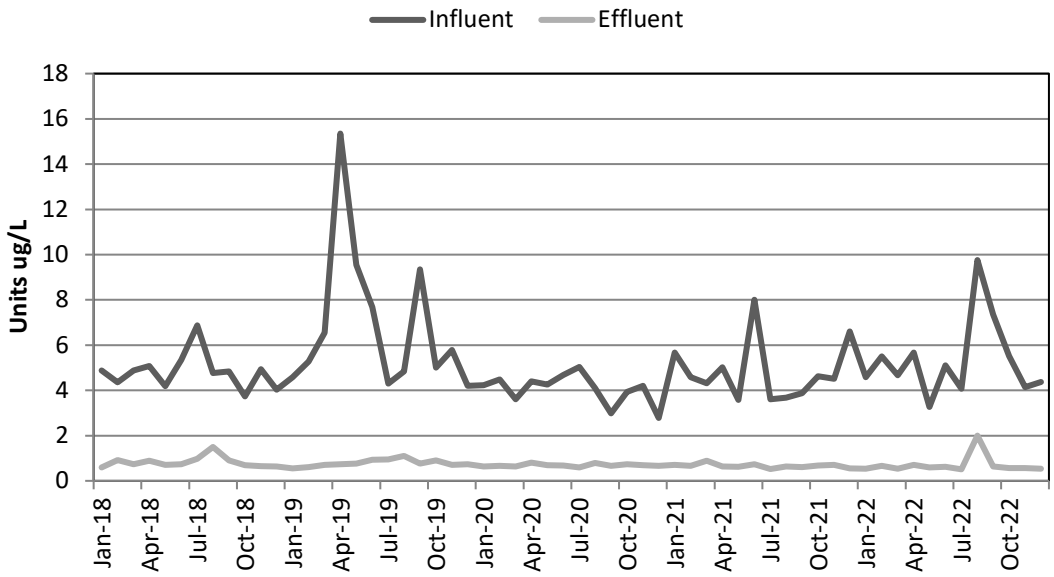
Figure A: Five Year Graph of Metals Influent and Effluent

Influent values are monthly averages

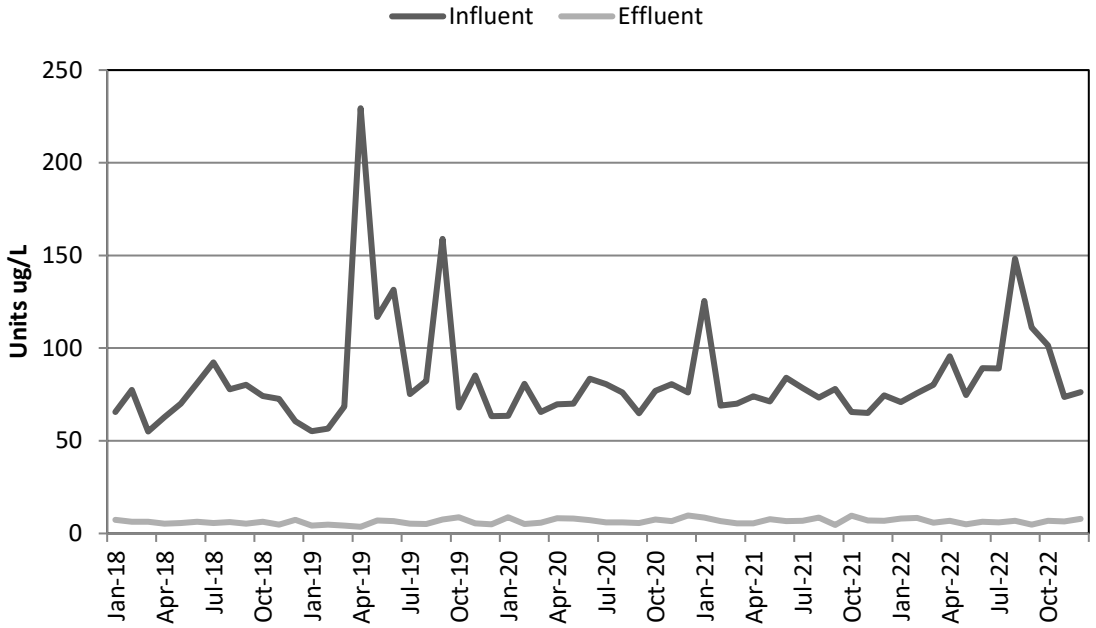




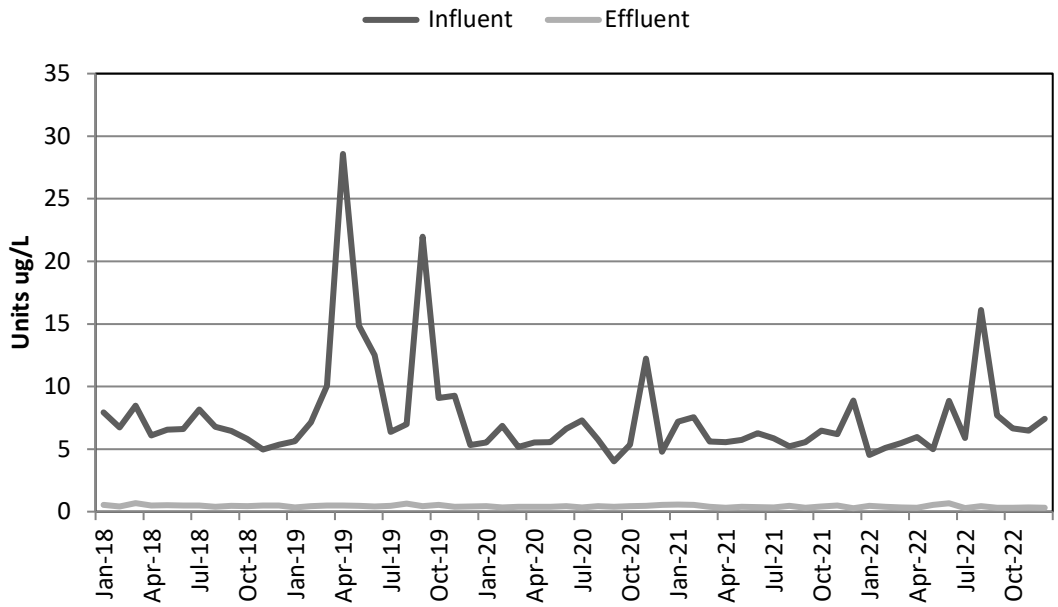
Chromium



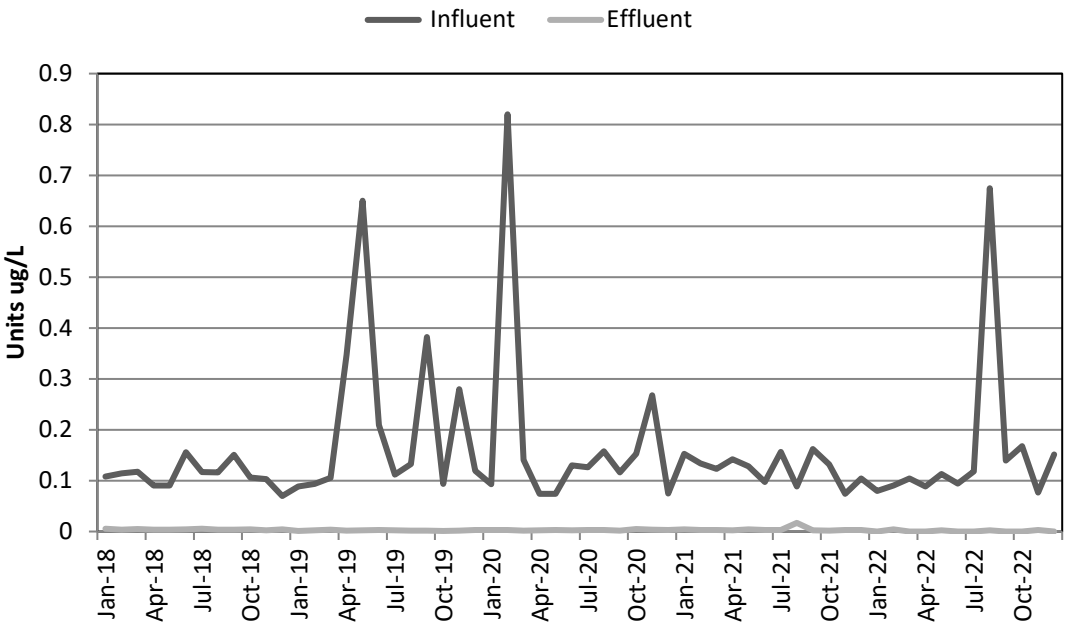
Copper



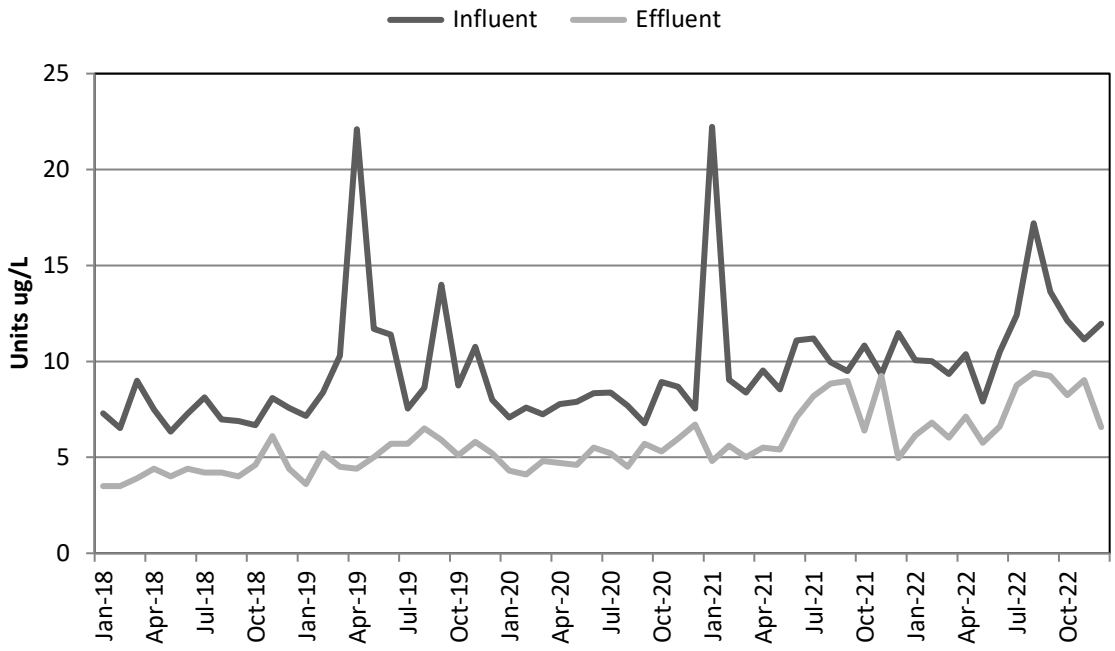
Lead



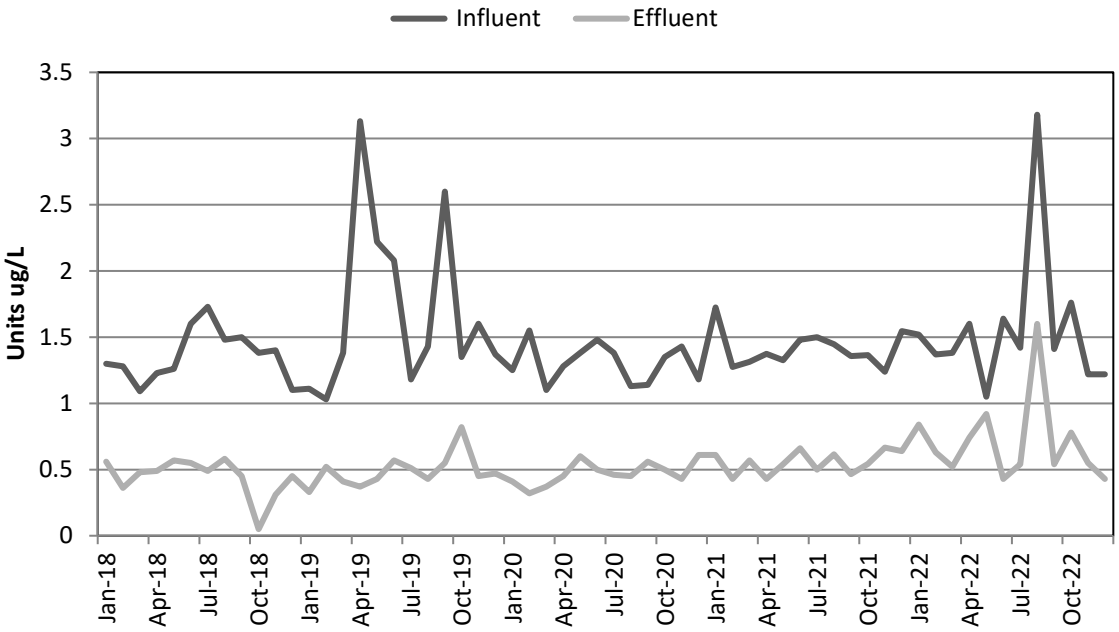
Mercury



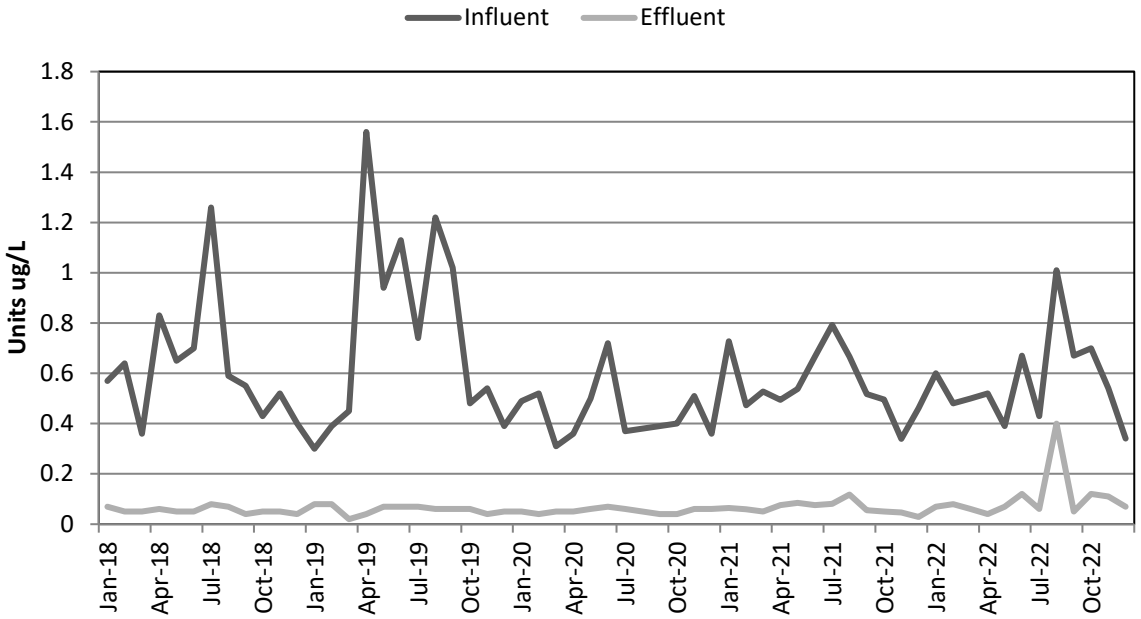
Nickel



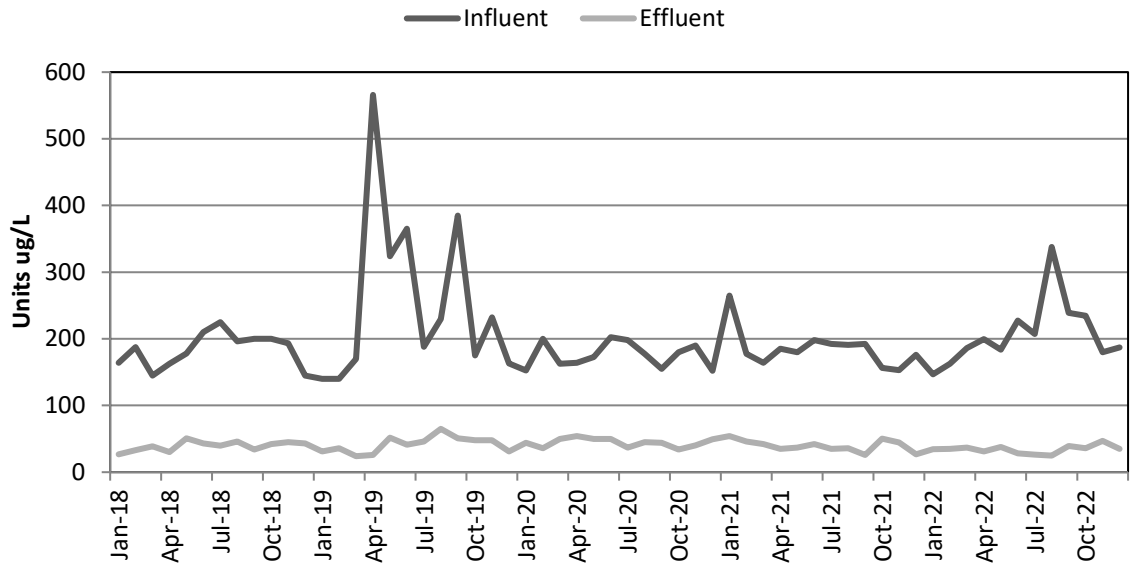
Selenium



Silver


Influent
Effluent
Units ug/L
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20
Jan-21
Apr-21
Jul-21
Oct-21
Jan-22
Apr-22
Jul-22
Oct-22

Zinc


Influent
Effluent
Units ug/L
600
500
400
300
200
100
0
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20
Jan-21
Apr-21
Jul-21
Oct-21
Jan-22
Apr-22
Jul-22
Oct-22

PCS DATA Entry Form for Annual Report

EBMUD PRETREATMENT PROGRAM

1. Discharger/Control Authority Name: East Bay Municipal Utility District

2. ORDER NO. R2-2020-0024, NPDES NO. CA0037702

	Description	(PCS Code)	No.[2]
3.	Beginning of Reporting Period End of Reporting Period	(PSSD) (PSED)	01/01/22 12/31/22
4.	SIUs in SNC w/Pretreatment Compliance Schedule	(SSNC)	0
5.	NOVs and Administrative Orders Issued Against SIUs	(FENF)	NOV- 2 CDO- 0 ACL-0
6.	Civil and Criminal Judicial Actions Against SIUs	(JUDI)	0
7.	SIUs w/Significant Noncompliance Published	(NCP)	0
8.	SIUs from which Penalties have been collected[1]	(IUPN)	SIU-Categorical-1 SIU Non-Categorical-1

[1] The penalties assessed are the EBMUD Board approved violation follow-up fees that are charged to industrial users to recover EBMUD's costs of enforcement.
[2] In 2022, EBMUD issued an NOV and a CDO to Monsen Silversmiths and published notification of being in SNC. These items are not included in the totals because Monsen Silversmiths was classified as a NSCIU during 2022, not an SIU.

THIS PAGE INTENTIONALLY LEFT BLANK FOR COVER

EAST BAY
MUNICIPAL UTILITY DISTRICT

375 Eleventh Street, Oakland, CA 94607
1-866-40-EBMUD
ebmud.com