EAST BAY
MUNICIPAL UTILITY DISTRICT

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

February 28, 2025

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 2024 Pretreatment Annual Report

Dear Mr. Chee and Ms. Whitson:

The East Bay Municipal Utility District (EBMUD) hereby submits the 2024 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 2024 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 Source Control, 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 2024\Pretreatment Report

THIS PAGE INTENTIONALLY LEFT BLANK

2024

Pretreatment Report

EBMUD | Wastewater Department

THIS PAGE INTENTIONALLY LEFT BLANK

EAST BAY MUNICIPAL UTILITY DISTRICT
2024 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 Source Control
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, 2024 to December 31, 2024**

"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."

2/26/25

AMIT MUTSUDDY, P.E. **DATE**
DIRECTOR OF WASTEWATER

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, Effluent and Biosolids Monitoring**	Page 2
F. **Inspection, Sampling and Enforcement Programs**	Page 12
G. **Updated List of Regulated SIUs**	Page 18
H. **SIU (categorical and non-categorical) Compliance Activities**	Page 19
1. **Inspection and Sampling Summary**	Exhibit G
2. **Enforcement Summary**	Exhibit E
3. **July-December Semiannual Data**	Page 19
I. **Baseline Monitoring Report Update**	Page 18
J. **Pretreatment Program Changes**	Page 10
K. **Pretreatment Program Budget**	Page 10
L. **Public Participation Summary**	Page 19
M. **Biosolids Storage and Disposal Practice**	Page 6
N. **Other Pollutant Reduction Activities**	Page 17
O. **Permit Compliance System (PCS) Data Entry Form**	Page 51

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(l)].

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 September 13, 2024.

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 Wastewater into a Community Sewer or District facilities.

Industrial User (IU): A source of any Industrial Wastewater from any nondomestic source regulated under Section 307(b), (c) or (d) of the Clean Water Act.

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(k)].

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(p)].

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(s)]

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.

Total Toxic Organics (TTO): The summation of compounds defined as "TTO" in 40 CFR 413.02(i), excluding 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) - "dioxin".

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
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
PCBs	Polychlorinated Biphenyls
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 2024 Pretreatment Annual Report for the East Bay Municipal Utility District (EBMUD).

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 44 and 52 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 2024) 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 2024, 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 2024, 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.

2.3.1 Influent, Effluent, and Biosolids Sampling Procedures

- **Metals:** Influent and effluent samples collected for metals, excluding mercury in effluent, are 24-hour flow proportioned composites collected via an ISCO autosampler into polyethylene containers and are held at 4ºC 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. Effluent mercury samples are grab samples. Samples are analyzed for metals using EPA Method 200.8. Samples are analyzed for mercury using EPA Method 245.1 and 1631. Influent metals, including mercury, are sampled weekly. Mercury in effluent is sampled quarterly, while all other metals in effluent are sampled monthly.

- **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. Influent is monitored for cyanide monthly. Effluent is monitored for cyanide at least monthly. 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. Samples are analyzed for cyanide using Standard Method 4500 CN or Kelada-01.

- **Volatile and Semi-Volatile Organics:** Samples collected for volatile and semi-volatile organics are collected from a dedicated grab sampling tap. 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, 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. Samples are analyzed for volatile organics using EPA Method 624.1. Semi-volatile organic samples are collected in certified organic-free one-liter amber containers with ascorbic acid added as a dechlorinating agent and are analyzed for semi-volatile Organics using EPA Method 625.1. Influent is sampled for volatiles and semi-volatiles once each calendar year.

- **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 4°C 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.

2.3.2 Influent, Effluent and Biosolids Sampling Results

All organic priority pollutant compounds were non-detect in influent samples analyzed in 2024. Influent was sampled once for volatile organics and once for semi-volatile organics in 2024, with a total of 96 parameters analyzed using EPA Methods 624.1 and 625.1.

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 A.

Table A: Priority Pollutant (EPA 624.1, 625.1, 608, and 1631B) 2021 Effluent Monitoring - Detected Compounds

Parameter	Date Collected	Result (µg/l)[1]	Qualifier[2]
Chloroform	3/10/21	6.52	
Methylene Chloride	3/10/21	0.42	E
Toluene	3/10/21	0.51	

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

Semi-annual effluent monitoring for polychlorinated biphenyls (PCBs), as congeners, as required by Order R2-2022-0038, was completed for this reporting period. Results were within normal range based on past monitoring. The samples had no detections of PCBs above minimum levels.

Table B summarizes the analytical results for 2024 influent and effluent metals and cyanide. Figure A illustrates influent and effluent metals monitoring results for the past five years.

Table B: 2024 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	2.37	2.85	2.24	2.48	2.06	2.62	2.44	2.36	2.49	2.39	2.38	2.58
	Effluent	EPA 200.8	2.12	2.11	1.58	1.78	1.64	1.60	1.66	2.09	1.85	1.98	1.68	1.89
Cadmium	Influent	EPA 200.8	0.19	0.21	0.21	0.33	0.25	0.32	0.25	0.27	0.24	0.24	0.23	0.18
	Effluent	EPA 200.8	0.02	0.04	0.03	0.04	0.17	0.14	0.02	0.15	0.28	0.25	0.12	0.13
Chromium	Influent	EPA 200.8	3.09	4.00	5.44	4.77	4.36	7.66	6.07	6.11	3.56	3.41	2.82	2.86
	Effluent	EPA 200.8	0.59	0.72	0.80	0.76	0.65	1.80	1.47	1.55	1.29	0.78	0.69	0.88
Copper	Influent	EPA 200.8	49.38	45.95	55.20	82.60	69.96	73.63	74.14	77.68	76.28	78.04	70.53	52.86
	Effluent	EPA 200.8	5.42	5.44	6.72	6.37	5.80	7.31	9.17	8.44	9.18	8.22	11.20	8.20
Cyanide	Influent	SM4500-CN E, Kelada 01	3.30	7.40	3.00	1.80	1.10	9.20	2.00	2.90	2.00	2.80	3.40	5.70
	Effluent	SM4500-CN E, Kelada 01	2.55	3.80	3.80	2.90	2.50	4.80	3.30	7.70	5.00	3.20	3.45	3.10
Lead	Influent	EPA 200.8	5.04	9.41	5.07	10.21	5.04	7.18	6.09	5.60	5.26	6.06	5.09	5.54
	Effluent	EPA 200.8	0.36	0.61	0.55	0.67	0.30	0.37	0.32	0.42	0.48	0.54	0.60	0.42
Mercury	Influent	EPA 245.1	0.08	0.09	0.11	0.31	0.11	0.14	0.13	0.11	0.12	0.39	0.07	0.08
	Effluent	EPA 1631	NS	0.009	NS	NS	0.003	NS	NS	0.003	NS	NS	0.003	NS
Nickel	Influent	EPA 200.8	8.33	10.06	9.02	9.96	8.13	11.06	8.36	8.43	9.52	8.71	8.96	7.65
	Effluent	EPA 200.8	5.50	6.25	5.63	6.69	5.23	5.34	4.69	5.74	6.25	7.21	6.25	6.13
Selenium	Influent	EPA 200.8	0.92	0.97	1.05	1.10	1.14	1.08	1.37	1.51	1.05	1.35	1.11	1.01
	Effluent	EPA 200.8	0.43	0.44	0.57	0.60	0.53	0.50	0.57	0.53	0.53	0.86	0.62	0.54
Silver	Influent	EPA 200.8	0.49	0.29	0.33	0.57	0.42	0.38	0.50	0.53	0.67	0.51	0.62	0.35
	Effluent	EPA 200.8	0.04	0.04	0.05	0.05	0.08	0.06	0.07	0.09	0.07	0.09	0.07	0.08
Zinc	Influent	EPA 200.8	126.80	121.00	137.25	213.25	167.00	185.25	192.80	202.50	193.25	195.20	176.50	135.56
	Effluent	EPA 200.8	29.20	25.70	23.90	37.20	28.60	40.70	40.00	61.30	61.40	42.90	45.70	39.90

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.

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 C presents the results for detected parameters from the two rounds of 5-day composite biosolids sampling in 2024. 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 C: 2024 Biosolids Monitoring Detected Parameters

Dewatering Method	**Centrifuge**		**Centrifuge**		**Ceiling Concentrations**
Season	**Wet Season**		**Dry Season**		
Sample Dates	**2/26/2024-3/1/2024**		**7/16/2024-7/20/2024**		
Units (Percent Solids)[2]	**mg/kg-wet (23%)**		**mg/kg-wet (22%)**		**mg/kg (dry weight)**
Method Parameter	**Result**	**Qualifier[1]**	**Result**	**Qualifier[1]**	**40 CFR 503.13**
	EPA 6010B (mg/kg)				
Arsenic	**0.97**	E1	**1.04**	E1	75
Barium	**71.70**		**NS[3]**		None
Beryllium	**0.04**	E1	**NS**		None
Cadmium	**0.38**	E1, R1	**0.12**	E1	85
Chromium	**12.10**		**10.40**		None
Cobalt	**1.45**	E1	**NS**		None
Copper	**84.60**	B1, M1	**82.00**		4,300
Lead	**16.10**		**7.02**		840
Molybdenum	**1.56**	E1	**NS**		75
Nickel	**8.49**		**7.13**		420
Selenium	**1.87**	E1, R1	**2.40**	E1	100
Silver	**0.42**	E1, R1	**0.40**	E1	None
Thallium	**0.79**	E1, R1	**NS**		None
Vanadium	**6.16**	E1	**NS**		None
Zinc	**154.00**		**154.00**		7,500
	EPA 7471A (mg/kg)				
Mercury	**0.21**		**0.11**		57
	SM 4500-CN-CE (mg/kg)				
Cyanide	**1.00**		**NS**		None
	EPA 8260B[4] (ug/kg)				
1,2,4-trimethylbenzene	**17.00**		**NS**		None
1,3,5-trimethylbenzene	**4.60**		**NS**		None
2-Butanone	**2,700.00**		**NS**		None
4-Methyl-2-pentanone	**6.80**	E1	**NS**		None
Carbon disulfide	**26.00**		**NS**		None
Ethyl benzene	**18.00**		**NS**		None
Isopropylbenzene	**0.73**	E1	**NS**		None
m-, p- xylenes	**23.00**		**NS**		None
Methylene chloride	**4.10**		**NS**		None
Naphthalene	**19.00**		**NS**		None
n-butylbenzene	**15.00**		**NS**		None

Dewatering Method	Centrifuge		Centrifuge		Ceiling Concentrations
Season	Wet Season		Dry Season		
Sample Dates	2/26/2024-3/1/2024		7/16/2024-7/20/2024		
Units (Percent Solids)[2]	mg/kg-wet (23%)		mg/kg-wet (22%)		mg/kg (dry weight)
Method Parameter	Result	Qualifier[1]	Result	Qualifier[1]	40 CFR 503.13
n-propylbenzene	**4.20**		**NS**		None
o-xylene	**4.60**		**NS**		None
p-isopropyltoluene	**80.00**		**NS**		None
Tert-butyl alcohol	**56.00**		**NS**		None
Toluene	**28.00**		**NS**		None
Total xylenes	**28.00**		**NS**		None
Trans-1,3-dichloropropene	**6.60**		**NS**		None
	EPA 8270C[4] (mg/kg)				
Bis(2-ethylhexyl)phthalate	**0.40**		**NS**		None
	SM 4500-S-2D (mg/kg)				
Sulfide	**3,300.00**		**NS**		None

[1]E1 - Concentration estimated. Analyte detected below reporting limit but above method detection limit; B1 - Analyte detected in method blank at or above acceptance criteria. The analytical batch meets acceptance criteria for reporting; M1 - The matrix spike recovery was outside acceptance limits due to possible matrix interference. The analytical batch meets accuracy criteria for reporting; R1 - The relative percent difference was outside laboratory acceptance limits due to possible matrix interference. The analytical batch meets criteria for reporting.
[2]Total solids was measured using SM2540 G, consistent with 40 CR 503.8(b). While ELAP does not offer accreditation for SM 2540 G, EBMUD determined that this data is not reported to the state for a regulatory purpose.
[3]NS – Not sampled.
[4]EPA 8260B and 8270C are now sampled annually as required by R2-2021-0028.

In 2024, EBMUD produced 70,560 wet tons of biosolids. Of these, 61 percent went to land application sites as soil amendment, 29 percent to a composting facility, 10 percent to a thermal hydrolysis facility for conversion into liquid fertilizer. Table D provides the amount of biosolids in wet tons for each of these uses by month.

Table D: 2024 EBMUD Biosolids Hauling and End Use by Month (Wet Tons)

Month	Compost	Thermal Hydrolysis	Land Application	Monthly Total
January	3,382	555	2,479	6,415
February	4,402	412	391	5,205
March	3,527	683	1,428	5,639
April	1,580	545	3,838	5,963
May	1,370	544	3,952	5,867
June	3,113	689	1,588	5,389
July	0	549	5,130	5,679
August	0	624	5,384	6,008
September	0	620	5,078	5,698
October	93	570	5,045	5,708
November	1,032	634	5,054	6,720
December	2,144	778	3,347	6,269
Totals	**20,643**	**7,203**	**42,714**	**70,560**

2.5 Plant Operating Data

Table E presents key MWWTP operating data for 2024. 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 April and November, effluent TSS remained consistent indicating that there was no impact on treatment plant performance.

Table E: Wastewater Treatment Plant Operating Data 2024

FLOW DATA	Units	Jan	Feb	Mar	April	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec		Avg	Min	Max
Daily Average	MG	69	88	65	56	49	44	43	44	44	43	50	64		55	43	88
Minimum Day	MG	48	56	51	48	42	42	36	42	42	41	41	44		44	36	56
Maximum Day	MG	131	147	95	88	81	47	47	48	47	46	150	111		87	46	150
Monthly Total	MG	2,145	2,545	2,002	1,692	1,520	1,329	1,334	1,362	1,315	1,342	1,507	1,985		1,673	1,315	2,545
INFLUENT QUALITY																	
cBOD (avg.)	mg/l	217	240	287	371	365	372	354	380	364	415	394	276		336	217	415
TSS (avg.)	mg/l	282	492	304	615	438	516	491	618	472	635	654	430		496	282	654
pH (avg.)	pH	6.6	6.6	6.5	6.6	6.5	6.5	6.5	6.5	6.5	6.5	6.6	6.6		6.5	6.5	6.6
EFFLUENT QUALITY																	
cBOD (avg.)[1]	mg/l	7	8	8	7	8	8	8	8	7	9	7	6		7	6	9
TSS (avg.)[2]	mg/l	7	11	9	10	8	11	11	11	13	16	11	9		10	7	16
pH (avg.)[3]	pH	6.9	6.9	6.7	6.7	6.7	6.7	6.6	6.5	6.5	6.6	6.6	6.6		6.6	6.5	6.9
OVERALL REMOVAL EFFICIENCY																	
cBOD[4]	%	97	97	97	98	98	98	98	98	98	98	98	98		98	97	98
TSS[4]	%	98	98	97	98	98	98	98	98	97	98	98	98		98	97	98

[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 2024 EBMUD conducted an industrial user survey of facilities operating in the plastics, concrete, detergent manufacturing and electronic manufacturing industries. A total of ten facilities were inspected, and it was determined that wastewater discharge permits were not required.

There were significant changes to EBMUD's local limits and legal authority (Wastewater Control Ordinance) in 2024 as noted below. No significant changes were made to EBMUD's Pretreatment Program with respect to monitoring /inspection program and frequency, enforcement protocol, administrative structure, resource requirements, or funding mechanism.

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 organized into the following three sections:

- **Source Control:** The Source Control Section is responsible for administering EBMUD's Pretreatment and Pollution Prevention Programs working with industries, commercial businesses, and residences to reduce the discharge of pollutants to the community sewer and ultimately the San Francisco Bay. The Section 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. No staffing changes occurred in 2024.

- **Private Sewer Lateral (PSL) Program:** The 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. The PSL Program Section consists of three Wastewater Control Representatives, eight Wastewater Control Inspector IIs, two Senior Wastewater Control Inspectors, one Senior Administrative Clerk and two Administrative Clerks. In 2024, due to promotions and retirements, three Wastewater Control Inspector IIs, and one Administrative Clerk were hired.

- **Resource Recovery (R2):** The R2 Program Section 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. The R2 Program Section consists of one Senior Environmental Health & Safety Specialist, two Associate Civil Engineers, one Senior Wastewater Control Inspector, one Wastewater Control Representative, and one Senior Administrative Clerk. In 2024, due to a promotion one Associate Civil Engineer was hired.

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 2024 (July 1, 2023 to June 30, 2024) is summarized in Table F. The budget specifically for Pretreatment Program activities is approximately 15 percent of the total Environmental Services Division budget.

Table F: Environmental Services Division Budget – Fiscal Year 2024

Expenditures	Dollars ($)
Personnel	$7,059,520
Equipment, Operations & Maintenance, Training & Travel	$234,145
Contracted Services	$38,500
Total	**$7,332,165**

3.2 Permit Classifications

EBMUD issues and maintains the permit types as shown below in Table G. See Section 4 for a detailed breakdown of the monitoring and compliance status for Significant Industrial Users (SIUs).

Table G: Permit Classifications and Number of Permits

Permit Classification	Permit Description	No. Permits as of 12/31/2024
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 Categorical Pretreatment Standards	7
Non-Categorical SIUs	Industries that are exempt from Categorical Pretreatment Standards, but discharge >25,000 gallons per day	6
Non-Significant Categorical Industrial Users (NSCIUs)	Industrial users subject to Categorical Pretreatment Standards but never discharge more than 100 gallons per day of process wastewater	1
Zero Discharger (ZD)	Industrial users subject to Categorical Pretreatment Standards but never discharge process wastewater	19
Hauled Waste (Resource Recovery Program)	Non-hazardous liquid waste delivered to the MWWTP for treatment from Industries residing outside EBMUD's Wastewater Service area that have been classified as an SIU by volume or subject to Categorical Pretreatment Standards	24

3.3 Inspection and Sampling Procedures

In 2024, 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 and Monitoring Frequencies

Inspection and monitoring 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 H describes the industrial user types and the respective minimum inspection/monitoring frequencies. In some cases, EBMUD conducts semi annual or annual monitoring on behalf of the permitted industrial user.

Table H: EBMUD Minimum Inspection and Monitoring Frequency

Discharger Category	Industrial User Self-Monitoring Frequency	EBMUD Minimum Inspection and Monitoring Frequency
SIUs:		
• CIU >5,000 gpd	• Once every six months	• Once per year
• Non-Categorical SIU	• Once every six months	• Once per year
• CIU – Middle Tier ≤5,000 gpd	• 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 the reasonable potential of hazardous materials entering the sanitary sewer. Pollution prevention opportunities may be discussed with the IU as well.

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 fact sheet, and previous inspection reports) and coordinate with the assigned Wastewater Control Representative (permit writer).
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 permit writer 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 permit writer.
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 permit writer 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 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 682 customer accounts; currently 280

accounts are active, holding 367 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; industrial wastewater; sludges; groundwater; and stormwater. Exhibit A summarizes trucked materials and volumes delivered in 2024.Table I lists the CIU facilities with active permits that delivered waste in 2024. Tankerwash is the only CIU listed and this permit is managed by the same Pollution Management Plan prepared by the City of Stockton. Table J lists all the SIU facilities with active EBMUD hauled waste permits that delivered waste in 2024. During 2024, all R2 SIUs were in compliance for each quarter.

Table I: List of Hauled Waste Categorical Industrial User (CIU) Permits

Company Name & Description	Permit No.	Address	City	Reason CIU	Date Inspected
Tankerwash - Sludge	1075228-001	743 W Anderson Street	Stockton	40 CFR 442	2/25/2025

Table J: List of Hauled Waste Non-Categorical SIU Permits

Company Name & Description	Permit No.	Address	City	Reason SIU	Date Inspected
California Dairies, Inc. - Dairy Facility Cleanup Waters - Tipton	CADA3000-001	11894 Avenue 120	Tipton	SIU > 25,000 gpd	12/18/2024
California Dairies, Inc. - Dairy Facility Cleanup Waters - Visalia	CADA3000-003	2000 N. Plaza Dr	Visalia	SIU > 25,000 gpd	12/18/2024
Clean Harbors - Bioengineered Fermentation - TDS Waste, Galli Dr.	CLHA3000-038	46 Galli Drive	Novato	SIU > 25,000 gpd	2/6/2025
Coca-Cola Company, The - EQ Tank, Beverage Processing Pretreatment Tank	AMBE3000-001	1201 Commerce Blvd	American Canyon	SIU > 25,000 gpd	12/11/2024
Coca-Cola Company, The - Off-Spec Beverages	AMBE3000-002	1201 Commerce Blvd	American Canyon	SIU > 25,000 gpd	12/11/2024
Coca-Cola Company, The - Waste Activated Sludge	AMBE3000-003	1201 Commerce Blvd	American Canyon	SIU > 25,000 gpd	12/11/2024
D & I Farms, Inc. - E&J Gallo Fresno Winery Waste	DIFA3000-002	5610 E Olive Ave	Fresno	SIU > 25,000 gpd	1/3/2025
Foster Farms - Poultry Waste - Burrel Plant Mixture	FOFA2208-001	1000 Davis St	Livingston	SIU > 25,000 gpd	12/8/2024

Company Name & Description	Permit No.	Address	City	Reason SIU	Date Inspected
Foster Farms - Waste Activated Sludge Pond Liquid	FOFA2208-006	1000 Davis St	Livingston	SIU > 25,000 gpd	12/8/2024
Foster Farms - Livingston Rendering Poultry Blood Serum	FOFA2208-008	1000 Davis St	Livingston	SIU > 25,000 gpd	12/8/2024
Franks Septic Service, Inc. - Mezzetta Food Processing Barrel Brine Wastewater	FRSE3000-033	105 Mezzetta Ct	American Canyon	SIU > 25,000 gpd	12/11/2024
Hilmar Cheese Company - Hilmar DAF	HICH2444-001	9001 Lander Ave	Hilmar	SIU > 25,000 gpd	12/8/2024
Hilmar Cheese Company - Acid Rinse + Salt Whey	HICH2444-004	9001 Lander Ave	Hilmar	SIU > 25,000 gpd	12/8/2024
Hilmar Cheese Company - Deep Well Water (aka RO Evap Brine)	HICH2444-010	9001 Lander Ave	Hilmar	SIU > 25,000 gpd	12/8/2024
Kinder Morgan Energy - Mixed Plant Process-Stormwater, 1140 Canal Blvd.	KIMO3000-005	1140 Canal Blvd	Richmond	SIU > 25,000 gpd	1/23/2025
Kleen Solution Environmental - Clover Flat Landfill Leachate	KLSO3000-007	4380 Silverado Trail N	Calistoga	SIU > 25,000 gpd	12/3/2024
Phillips 66 - Rodeo Renewable Energy Complex Gums	1140778-001	1290 San Pablo Ave	Rodeo	SIU > 25,000 gpd	8/15/2024
Recology Blossom Valley Organics - Vernalis Stormwater Pond	REBL3000-001	3909 Gafferty Rd	Vernalis	SIU > 25,000 gpd	12/13/2024
Republic Services - Pacheco Stormwater	ALWA3002-001	743 W Anderson St	Pacheco	SIU > 25,000 gpd	12/23/2024
Republic Services - Sonoma County MSW Landfill Leachate	ALWA3000-005	500 Mecham Rd	Petaluma	SIU > 25,000 gpd	12/11/2024
Sun Valley Transport, Inc. - Crimson Biodiesel High Strength Process Water	SUVA3001-003	17731 Millux Rd	Bakersfield	SIU > 25,000 gpd	11/19/2024
Sun Valley Transport, Inc. - Crystal Creamery Dairy DAF	SUVA3001-006	529 Kansas Ave	Modesto	SIU > 25,000 gpd	12/6/2024
Valley Milk Transport Inc. Becerra - Crystal Creamery Dairy DAF	VAMI3000-001	529 Kansas Ave	Modesto	SIU > 25,000 gpd	12/6/2024

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 2024, 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. EBMUD's established Enforcement Response Plan (ERP) remains in effect. The ERP provides guidance for enforcement of Federal regulations and Ordinance provisions and was most recently updated in August 2023. Exhibit B summarizes EBMUD's current enforcement response procedures.

The Wastewater Control 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. EBMUD's Wastewater Control Ordinance was amended in 2024 to incorporate changes to local limits and other clarifications to ensure consistency with federal regulations. The Ordinance is available on EBMUD's website (www.ebmud.com).

3.6 Local Limits

In accordance with EBMUD's letter submitted to the RWQCB on April 19, 2021; EBMUD conducted a local limits review in fiscal year 2023 and submitted the Report to the RWQCB on June 26, 2023. EBMUD Board of Directors adopted amendments to the Wastewater Control Ordinance (Number 377-24) which became effective on September 13, 2024, and incorporates the revised Local Limits. Specifically, the limit of 0.5 mg/L for total identifiable chlorinated hydrocarbons (TICH) was replaced with a new 2.10 mg/L limit for total toxic organics (TTOs). Additionally, an existing oil and grease limit of 100 mg/L was specified as oil and grease of mineral origin and a new limit of 300 mg/L for oil and grease of animal and vegetable origin was added. EBMUD's current local discharge limits can be found in the Ordinance, Title II, Section 3 (a) and are shown in Exhibit C.

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 2024 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

Table J list all the SIU facilities with active EBMUD permits as of December 31, 2024. Table K lists the SIUs permits terminated in 2024.

Table K: List of Categorical Industrial User (CIU) SIU permits

Company Name[1]	Permit No.	Address	City	Reason SIU[2]
Belfiore Cheese Co. – Cheese Manufacturing	17074400	2031 2nd St. #A	Berkeley	40 CFR 405 Subpart F
California Cereal Products – Cereal Manufacturing	03301042	1267 14th St.	Oakland	40 CFR 406 Subparts H and I
Chemical Compounding Company – Soap and Detergent Manufacturing	1431478	791 66th Ave.	Oakland	40 CFR 417 Subparts H and Q
ERG Materials and Aerospace Corporation – Metal Finishing	15583800	964 Stanford Ave.	Emeryville	40 CFR 433.17
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

[1] No discharge limits were developed using the Combined Waste Stream formula for any of the CIUs

[2] Exhibit D lists the applicable Categorical Pretreatment Standards for each of the CIUs

Table L: List of Non-Categorical SIU permits

Company Name & Business Description	Permit No.	Address	City	Reason SIU[1]
Aramark Uniform Services – Industrial Laundry	03300801	330 Chestnut St.	Oakland	>25,000 gpd
Bayer US LLC – Drug manufacturing	10600333	4th & Parker Street	Berkeley	>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

Table M: List of SIU Permits Terminated in 2024

Company Name & Business Description	Permit No.	Address	City	Reason Deleted
Monsen Silversmiths – Electroplating	02690041	3370 Adeline St.	Berkeley	Facility closure

4.2 Baseline Monitoring Report (BMR) Update

No new CIUs were added to the Pretreatment Program in 2024; therefore, there are no Baseline Monitoring Report updates to report.

4.3 July-December Semiannual Data

All SIUs were in consistent compliance July through December 2024, as well as the prior semi-annual reporting period from January through June 2024.

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. No SIUs were in SNC during the reporting period, therefore EBMUD did not make any publications regarding SNC in 2024.

4.5 Compliance Activities for SIU Regulated Facilities

See Exhibit E for status of all regulated SIUs as of December 31, 2024. Exhibit H and Exhibit G provide a summary of the compliance activities for SIUs for all four quarters in 2024.

Exhibits

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

Category	Material Type	Description	Gallons in 2024
Septage	Septage	Domestic sewage from septic tanks and portable toilets.	21,585,000
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.	7,400,000
	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.	67,110,000
	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. As of mid-2024 only dilute "serum" accepted in order to reduce total nitrogen loading.	
	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.	85,602,000
	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.	

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

Category	Material Type	Description	Gallons in 2024
	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.	19,260,000

Exhibit B: Enforcement Response Plan Summary

<table>
<tr><th colspan="2">Initial Action</th></tr>
<tr><td colspan="2">• Informal Notice
• Informal Meeting
• Notice of Violation/Follow-Up Fees:[1]
o Violation that does not require follow up sampling, Stage One: $840
o Violation that requires follow up sampling, Stage Two: $1,920*
o Violation under Director's Order and/or compliance schedule, Stage Three: $3,770*
*does not include testing fees</td></tr>
<tr><th colspan="2">Escalated 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
o Failure to Submit Report: $1,000/day
o Hazardous Waste Discharge/Reporting Falsified Information: $5,000/day
o Discharge in Violation of Order/Prohibition: $10/gallon</td></tr>
<tr><th colspan="2">Escalated 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
o Failure to Comply with EBMUD Order: $10,000/day
o Intentional or Negligent Pollution under EBMUD Order: $25,000/day
• Injunction
o Discharge in Violation of Ordinance Causes/Threatens to Cause Pollution
o Failure to Submit Required Report
o Failure to Allow EBMUD Access to Facility</td></tr>
</table>

[1] Fees effective July 1, 2024

Exhibit C: EBMUD Local Limits

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)**
Total Toxic Organics (TTO)[1]	2.10
Cyanide	5
Oil and Grease (mineral)	100
Oil and Grease (animal/vegetable)	300
pH (in S.U.)[2]	not less than 5.5[3]
Phenolic compounds	100
Temperature[4]	150F

[1] TTO is the summation of compounds defined as "TTO" in 40 CFR 413.02(i), excluding 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) - "dioxin".
[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	Received	Parameter	Daily Maximum	Maximum Monthly Average	Daily Maximum	Instantaneous Maximum
Fryer Ind. dba Dougco	6/30/25	1/15/90	2/8/90	Arsenic	-	-	2	-
Scientific Platers	6/30/25	12/3/97	12/23/97	Cadmium	0.11	0.07	1	-
ERG Platers	7/1/27	1/27/20	3/06/20	Chromium (total)	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 (mineral)	-	-	-	100
				Oil and Grease (animal/vegetable)	-	-	-	300
				pH	-	-	-	Not <5.5
				Phenols	-	-	-	100
				Silver	0.43	0.24	1	-
				Temperature	-	-	-	150°F
				Total Toxic Organics	2.13	-	-	2.1
				Zinc	2.61	1.48	5	-

Transportation Equipment Cleaning Category - 40 CFR 442.15				Limits (mg/L)			
	Permit	BMR	BMR		Federal	EBMUD	
Industry Name	Exp. Date	Due Date	Received	Parameter	Daily Maximum	Daily Maximum	Instantaneous Maximum
Qualawash Holdings, LLC (Formerly Harkrader Trucking)	5/26/26	*	*	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	-
				Chromium (total)	-	2	-
				Copper	0.84	5	-
				Cyanide		-	5
				Iron	-	100	-
				Lead	-	2	-
				Mercury	0.0031	0.05	-
				Nickel	-	5	-
				Oil and Grease (mineral)	26	-	100
				Oil and Grease (animal/vegetable)	-	-	300
				pH	-	-	Not <5.5
				Phenols	-	-	100
				Silver	-	1	-
				Temperature	-	-	150°F
				Total Toxic Organics	-	-	2.1
				Zinc	-	5	-

Dairy Products Processing Point Source Category - 40 CFR 405 Subpart F – Natural and Processed Cheese Subcategory				Limits (mg/L)			
	Permit	BMR	BMR		Federal	EBMUD	
Industry Name	Exp. Date	Due Date	Received	Parameter	Daily Maximum*	Daily Maximum	Instantaneous Maximum
Belfiore Cheese Co.	5/01/28	3/2/23	3/6/23	Arsenic	-	2	-
*No federal discharge limits exist for this category.				Cadmium	-	1	-
				Chromium (total)	-	2	-
				Copper	-	5	-
				Cyanide	-	-	5
				Iron	-	100	-
				Lead	-	2	-
				Mercury	-	0.05	-
				Nickel	-	5	-
				Oil and Grease (mineral)	-	-	100
				Oil and Grease (animal/vegetable)	-	-	300
				pH	-	-	Not<5.5
				Phenols	-	-	100
				Silver	-	1	-
				Temperature	-	-	150°F
				Total Toxic Organics	-	-	2.1
				Zinc	-	5	-

Soap and Detergent Manufacturing Point Source Category - 40 CFR 417 Subpart H - Manufacture of Liquid Soaps Subcategory and Subpart Q – Manufacture of Detergents by Dry Blending Subcategory				**Limits (mg/L)**			
	Permit	**BMR**	**BMR**		**Federal**	**EBMUD**	
Industry Name	**Exp. Date**	**Due Date**	**Received**	**Parameter**	**Daily Maximum**	**Daily Maximum**	**Instantaneous Maximum**
Chemical Compounding Company	2/28/28	10/31/22	10/20/22	Arsenic	-	2	-
				Cadmium	-	1	-
				Chromium (total)	-	2	-
				Copper	-	5	-
				Cyanide	-	-	5
				Iron	-	100	-
				Lead	-	2	-
				Mercury	-	0.05	-
				Nickel	-	5	-
				Oil and Grease (mineral)	-	-	100
				Oil and Grease (animal/vegetable)	-	-	300
				pH	-	-	Not<5.5
				Phenols	-	-	100
				Silver	-	1	-
				Temperature	-	-	150°F
				Total Toxic Organics	-	-	2.1
				Zinc	-	5	-
				COD/BOD7	There shall be no discharge of wastewater streams in which both the COD/BOD7 ratio exceeds 10.0 and the COD exceeds 0.26 kg/kkg of anhydrous product.	-	-

Grain Mills Point Source Category - 40 CFR 406 Subpart H - Hot Cereal Subcategory and Subpart I – Ready-to-Eat Subcategory				Limits (mg/L)			
	Permit	BMR	BMR		Federal	EBMUD	
Industry Name	Exp. Date	Due Date	Received	Parameter	Daily Maximum*	Daily Maximum	Instantaneous Maximum
California Cereal Products, Inc.	11/15/28	4/14/23	4/14/23	Arsenic	-	2	-
*No federal discharge limits exist for this category.				Cadmium (total)	-	1	-
				Chromium	-	2	-
				Copper	-	5	-
				Cyanide	-	-	5
				Iron	-	100	-
				Lead	-	2	-
				Mercury	-	0.05	-
				Nickel	-	5	-
				Oil and Grease (mineral)	-	-	100
				Oil and Grease (animal/vegetable)	-	-	300
				pH	-	-	Not <5.5
				Phenols	-	-	100
				Silver	-	1	-
				Temperature	-	-	150F
				Total Toxic Organics	-	-	2.1
				Zinc	-	5	-

Exhibit E: SIU Monitoring and Violations Summary

	2024 PERMIT SUMMARY[1]				EBMUD INSPECTIONS	SAMPLING EVENTS			VIOLATIONS			COMPLIANCE STATUS[4]				
	IN EFFECT 12/31/24	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	0	0	0	3	3	2	5	0	0	$0	3	0	0	0	0
40 CFR 442 TRANSPORTATION EQUIPMENT CLEANING	1	0	0	0	2	2	0	2	0	0	$0	1	0	0	0	0
40 CFR 405 DAIRY PRODUCTS PROCESSING	1	0	0	0	1	1	4	5	0	0	$0	1	0	0	0	0
40 CFR 417 SOAP AND DETERGENT MANUFACTURING	1	0	0	0	1	1	0	1	0	0	$0	1	0	0	0	0
40 CFR 406 GRAIN MILLS	1	0	0	0	1	0	2	2	0	0	$0	1	0	0	0	0
40 CFR 413 ELECTROPLATING	0	0	1	0	1	0	0	0	0	0	$0	0	0	0	0	0
Sub-total for SIU-Categorical	*7*	*0*	*1*	*0*	*9*	*7*	*8*	*15*	*0*	*0*	*$0*	*7*	*0*	*0*	*0*	*0*
Non-Categorical Significant Industrial Users																
BCC 2080 BEVERAGE MANUFACTURE	3	0	0	0	6	12	120	132	0	0	$0	3	0	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 2830 DRUG MANUFACTURING	1	0	0	0	1	1	2	3	0	0	$0	1	0	0	0	0
BCC 7218 INDUSTRIAL LAUNDRIES	1	0	0	0	2	2	2	4	0	0	$0	1	0	0	0	0
Sub-total for SIU-Local	*6*	*0*	*0*	*0*	*11*	*17*	*126*	*143*	*0*	*0*	*$0*	*6*	*0*	*0*	*0*	*0*
Grand Totals	**13**	**0**	**1**	**0**	**20**	**24**	**134**	**158**	**0**	**0**	**$0**	**13**	**0**	**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, regulated process change or for violation of the permit terms and conditions or the EBMUD Wastewater Control Ordinance.

[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. The current status as of December 31, 2024.

Exhibit F: Significant Industrial User Compliance Activities – Categorical

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 433 - Metal Finishing										
ERG Materials and Aerospace Corporation	4	C	1	1	0	0	0	$0	0	ERG was in consistent compliance during the 2024 reporting period.
964 Stanford Oakland, CA 94608	3	C	0	0	0	0	0	$0	0	
Permit No. 15583800	2	C	0	0	0	0	0	$0	0	
Expires: 7/1/27	1	C	0	0	0	0	0	$0	0	
Totals for ERG			1	1	0	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 433 - Metal Finishing										
Fryer Industries Inc./dba Dougco 1073 34th St. Oakland, CA 94608 Permit No. 26414503 Expires: 6/30/2025	4	C	0	0	0	0	0	$0	0	Fryer was in consistent compliance during the 2024 reporting period.
	3	C	1	1	1	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	

[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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 433 - Metal Finishing										
Scientific Platers, Inc. 9809 Kitty Lane Oakland, CA 94603 Permit No. 14322574 Expires: 6/30/2025	4	C	0	0	0	0	0	$0	0	Scientific Platers, Inc. was in consistent compliance during the 2024 reporting period.
	3	C	0	0	0	0	0	$0	0	
	2	C	1	1	1	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Scientific Platers			1	1	1	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 442 – Transportation Equipment Cleaning										
Qualawash Holdings, LLC 9957 Medford Ave. Oakland, CA 94603 Permit No. 07150984 Expires: 5/26/2026	4	C	0	0	0	0	0	$0	0	Qualawash Holdings, LLC maintained consistent compliance in 2024.
	3	C	1	1	0	0	0	$0	0	
	2	C	1	1	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Qualawash Holdings			2	2	0	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 405 – Dairy Products Processing										
Belfiore Cheese Co. 2031 St., #A Berkeley, CA 94710 Permit No. 17074400 Expires: 5/1/2028	4	C	1	1	1	0	0	$0	0	Belfiore Cheese Co. was in consistent compliance during the 2024 reporting period.
	3	C	0	0	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 Belfiore Cheese Co.			1	1	4	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 417 – Soap and Detergent Manufacturing										
Chemical Compounding Company 791 66th Ave. Oakland, CA 94621 Permit No. 14314783 Expires: 2/28/2028	4	C	0	0	0	0	0	$0	0	Chemical Compounding Company maintained consistent compliance in 2024.
	3	C	0	1	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 Chemical Compounding			1	1	0	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
40 CFR 406 – Grain Mills										
California Cereal Products 1267 14th St. Oakland, CA 94607 Permit No. 03301042 Expires: 11/15/2028	4	C	1	0	1	0	0	$0	0	California Cereal Products was in consistent compliance during the 2024 reporting period.
	3	C	0	0	1	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for California Cereal			1	0	2	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2,3]	EBMUD Insp	SAMPLES		ENFORCEMENT[4]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[5]	Viol. Fees	Orders	
40 CFR 413 – Electroplating										
Monsen Silversmiths	4	N/A	0	0	0	0	0	$0	0	Monsen Silversmiths ceased all operations in Q1 2023 and sold the facility in Q4 2023. The new owner agreed to take responsibility for removing all chemicals on site and submitted a site closure plan. The Permit issued to Monsen Silversmiths was terminated on October 31, 2023. A final inspection was conducted with the new owner on January 4, 2024, to confirm all chemicals had been removed.
3370 Adeline St. Berkeley, CA 94703	3	N/A	0	0	0	0	0	$0	0	
Permit No. 02690041	2	N/A	0	0	0	0	0	$0	0	
	1	C	1	0	0	0	0	$0	0	
Totals for Monsen Silversmiths			1	0	0	0	0	$0	0	

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

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

[3] N/A – Not applicable

[4] 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 2024

[5] All types of violations are included in NOVs

Exhibit G: 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	4	C	1	1	0	0	0	$0	0	SVC was in consistent compliance during the 2024 reporting period.
5625 International Blvd. Oakland, CA 94621	3	C	0	0	1	0	0	$0	0	
Permit No. 50367682	2	C	1	1	0	0	0	$0	0	
Expires: 9/1/2028	1	C	0	0	1	0	0	$0	0	
Totals for SVC Manufacturing			2	2	2	0	0	$0	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 2024

[4] All types of violations are included in NOVs

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										
Safeway Beverage Plant 1921 San Joaquin St. Richmond, CA 94804 Permit No. 05900451 Expires: 3/31/2026	4	C	0	0	1	0	0	$0	0	Safeway Beverage Plant was in consistent compliance during the 2024 reporting period.
	3	C	1	1	0	0	0	$0	0	
	2	C	1	1	1	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals for Safeway Beverage			2	2	2	0	0	$0	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 2024

[4] All types of violations are included in NOVs

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										
Takara Sake 708 Addison St. Berkeley, CA 94710 Permit No. 10600278 Expires: 6/30/2025	4	C	0	0	31	0	0	$0	0	Takara Sake was in consistent compliance during the 2024 reporting period.
	3	C	1	4	29	0	0	$0	0	
	2	C	1	4	28	0	0	$0	0	
	1	C	0	0	28	0	0	$0	0	
Totals for Takara Sake			2	8	116	0	0	$0	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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 3300 – Primary Metals Manufacturing										
Schnitzer Steel Products 1101 Embarcadero West Oakland, CA 94607 Permit No. 02300311 Expires: 12/1/2028	4	C	0	0	0	0	0	$0	0	Schnitzer Steel Products maintained consistent compliance in 2024.
	3	C	1	1	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	

[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 2024

[4] All types of violations are included in NOVs

CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 2830 – Drug Manufacturing										
Bayer Corporation	4	C	0	0	1	0	0	$0	0	Bayer U.S. LLC (Bayer) maintained consistent compliance in 2024.
800 Dwight Way Berkeley, CA 94710	3	C	1	1	0	0	0	$0	0	
Permit No. 10600333	2	C	0	0	1	0	0	$0	0	
Expires: 9/30/2028	1	C	0	0	0	0	0	$0	0	
Totals for Bayer			1	1	2	0	0	$0	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 2024

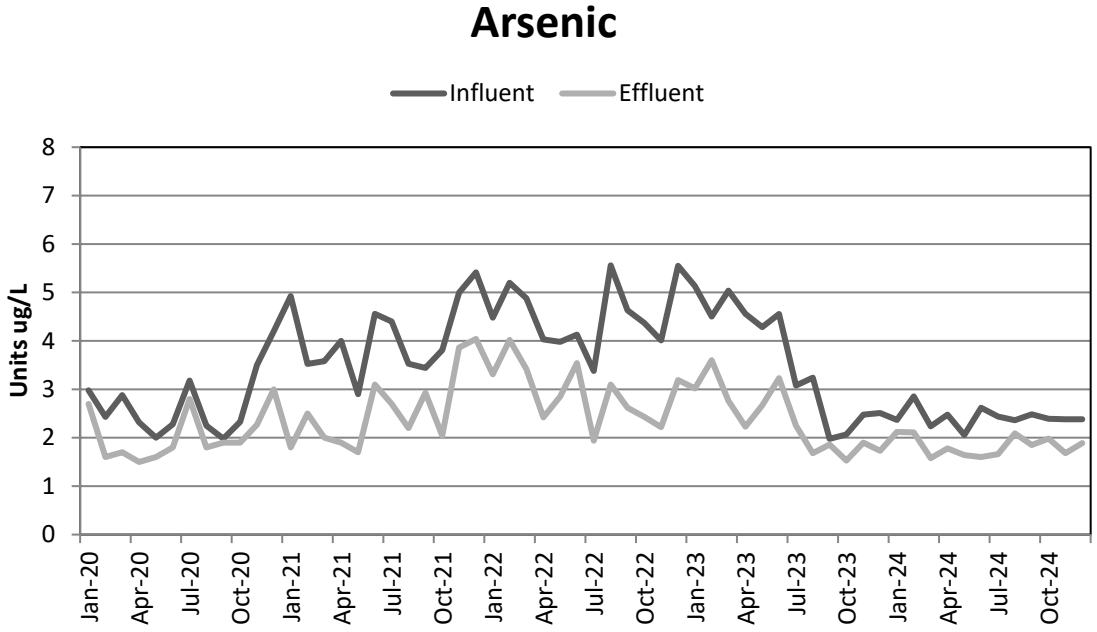
[4] All types of violations are included in NOVs

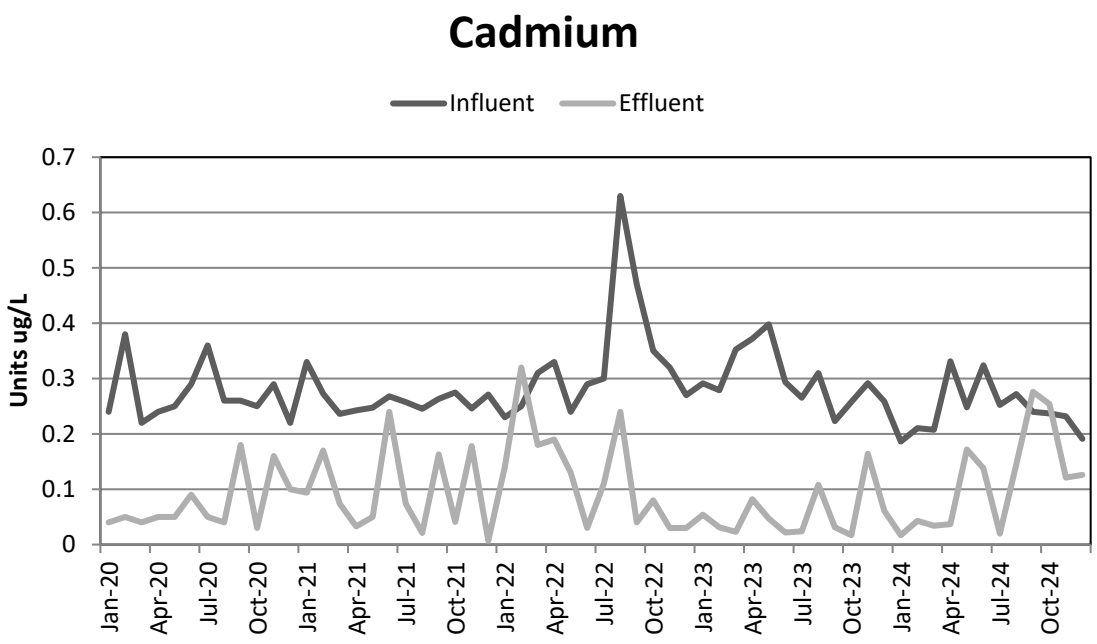
CATEGORY Facility	Qtr[1]	Compl. Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 7218 – Industrial Laundries										
Aramark Uniform Services 330 Chestnut St. Oakland, CA 94607 Permit No. 03300801 Expires: 10/10/2028	4	C	0	0	0	0	0	$0	0	Aramark Uniform Services maintained consistent compliance in 2024.
	3	C	1	1	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 Aramark			2	2	2	0	0	$0	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 2024
[4] All types of violations are included in NOVs

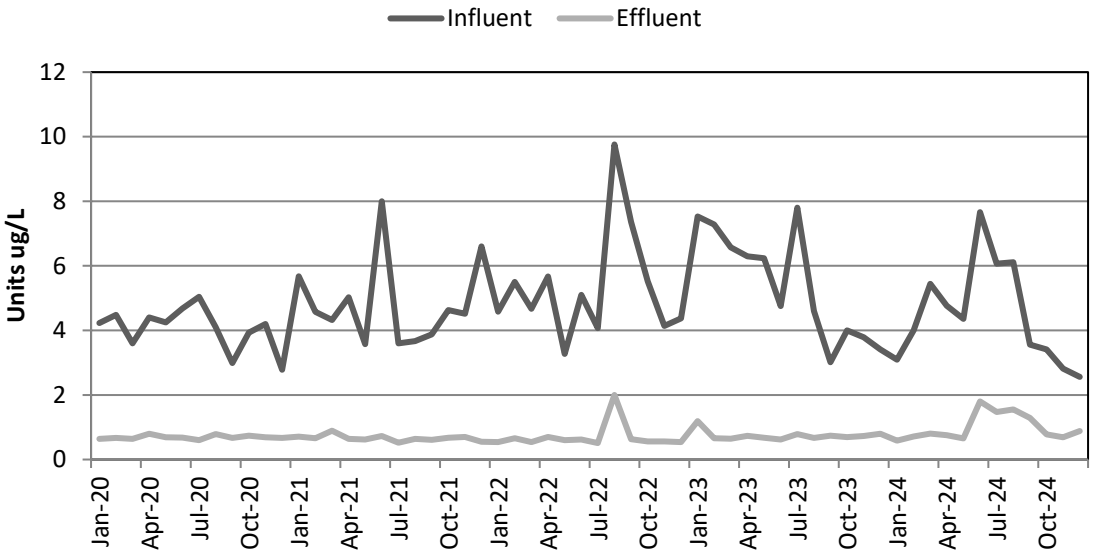
FIGURES

Figure A: Five Year Graph of Metals Influent and Effluent
Influent values are monthly averages

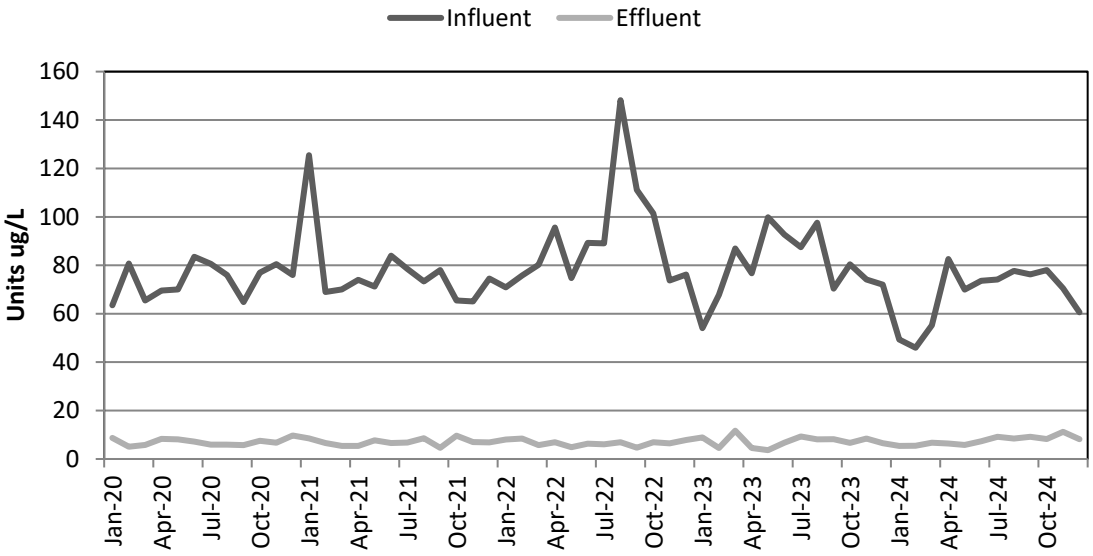




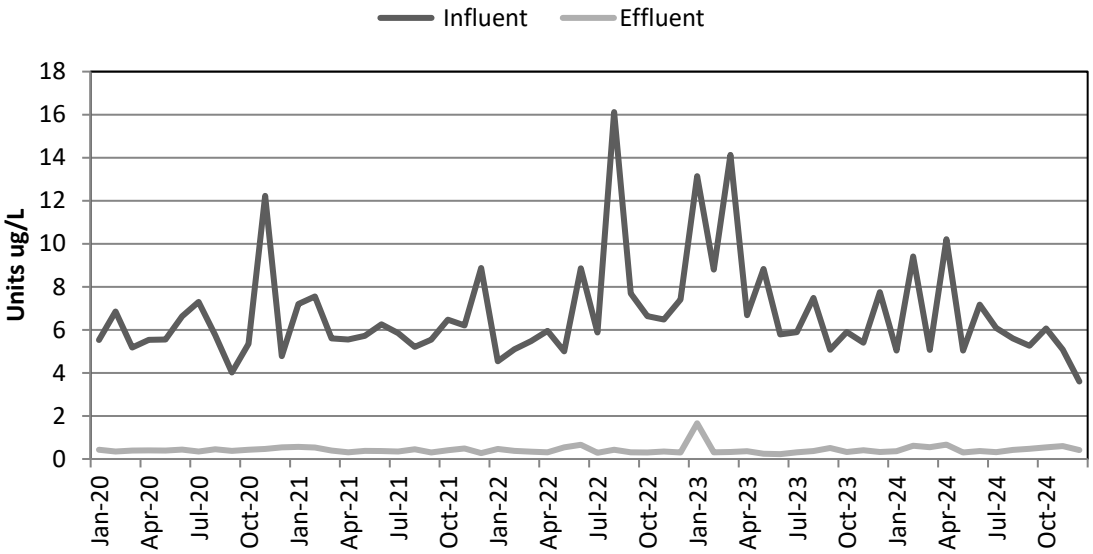
Chromium



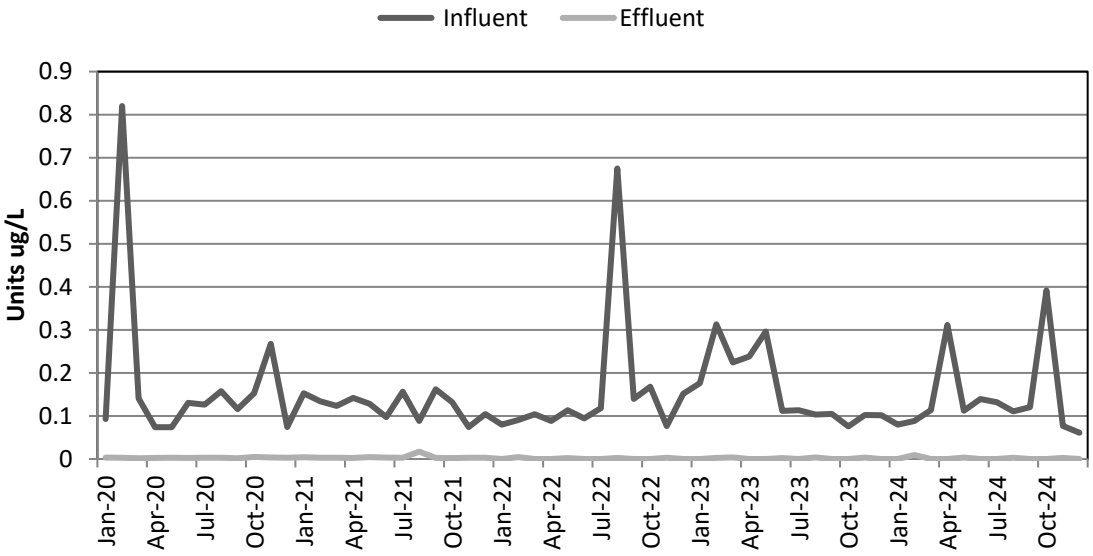
Copper



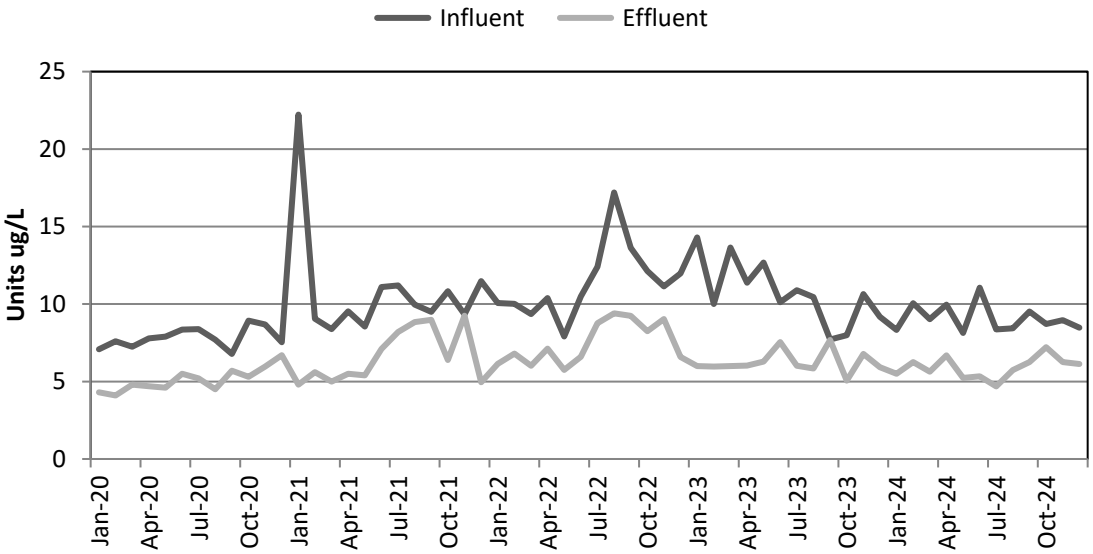
Lead



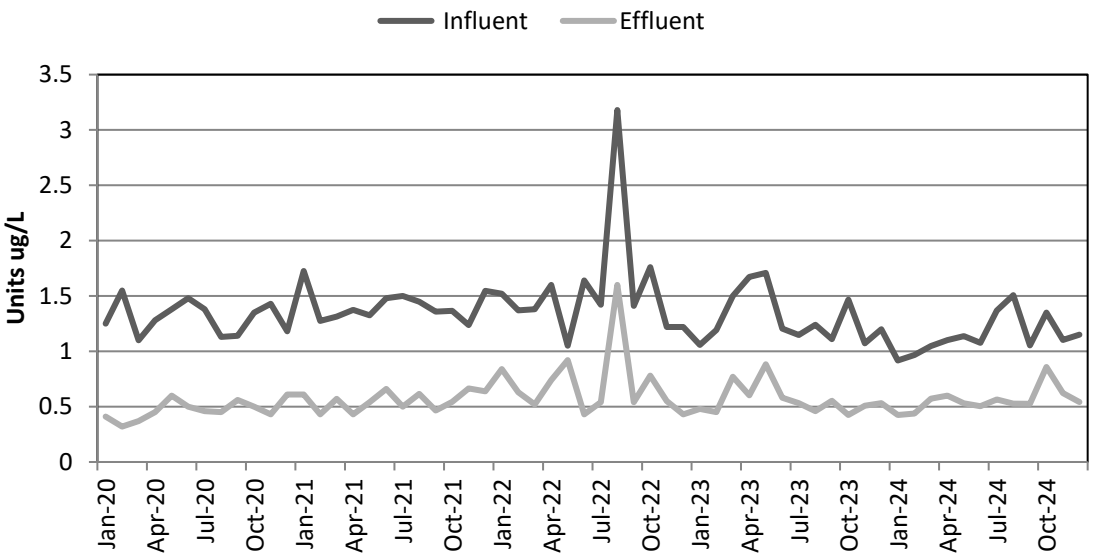
Mercury



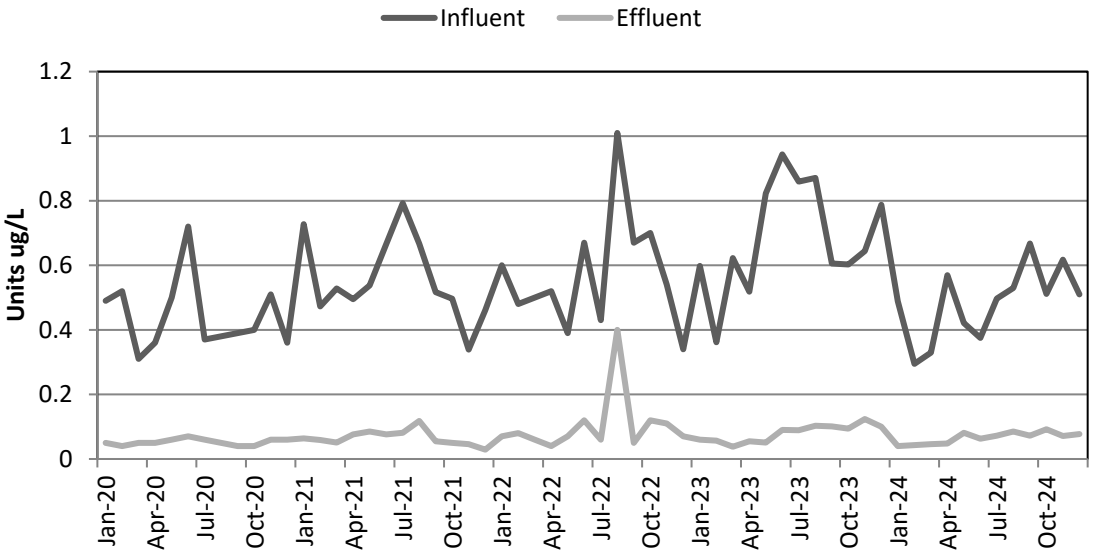
Nickel



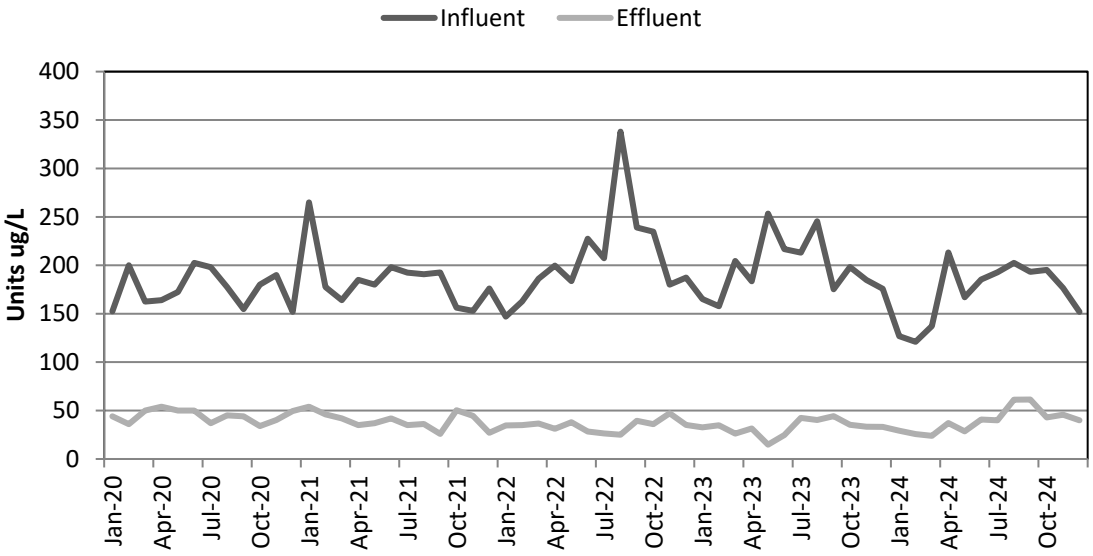
Selenium



Silver


Influent
Effluent
Units ug/L
1.2
1
0.8
0.6
0.4
0.2
0
Jan-20
Apr-20
Jul-20
Oct-20
Jan-21
Apr-21
Jul-21
Oct-21
Jan-22
Apr-22
Jul-22
Oct-22
Jan-23
Apr-23
Jul-23
Oct-23
Jan-24
Apr-24
Jul-24
Oct-24

Zinc


Influent
Effluent
Units ug/L
400
350
300
250
200
150
100
50
0
Jan-20
Apr-20
Jul-20
Oct-20
Jan-21
Apr-21
Jul-21
Oct-21
Jan-22
Apr-22
Jul-22
Oct-22
Jan-23
Apr-23
Jul-23
Oct-23
Jan-24
Apr-24
Jul-24
Oct-24

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.
3.	Beginning of Reporting Period End of Reporting Period	(PSSD) (PSED)	01/01/24 12/31/24
4.	SIUs in SNC w/Pretreatment Compliance Schedule	(SSNC)	0
5.	NOVs and Administrative Orders Issued Against SIUs	(FENF)	NOV- 0 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-0 SIU Non-Categorical-0

[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 implementing enforcement measures.

EAST BAY
MUNICIPAL UTILITY DISTRICT

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