2020

Pretreatment Report

EBMUD | Wastewater Department

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EAST BAY
MUNICIPAL UTILITY DISTRICT

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February 25, 2021

VIA E-MAIL, UPLOADED TO CIWQS

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

RE: East Bay Municipal Utility District 2020 Annual Pretreatment Report

Dear Mr. Chee and Ms. Whitson:

The East Bay Municipal Utility District (EBMUD) hereby submits the 2020 Pretreatment Annual Report, which was developed in accordance with NPDES Permit No. CA 0037702. Order Nos. R2-2015-0018 and R2-2020-0024. Please note EBMUD has incorporated comments on EBMUD's 2019 Pretreatment Annual Report as transmitted in the letter dated January 8, 2021, from the San Francisco Bay Regional Water Quality Control Board. EBMUD's pollution reduction activities for 2020 can be found in the Annual Pollution Prevention Report (submitted separately).

If you have any questions regarding this report, please contact Phoebe Grow, EBMUD Pretreatment and Pollution Prevention Supervisor, at 510-287-0205 or phoebe.grow@ebmud.com.

Sincerely,

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

Enclosure

cc : Eileen M. White, EBMUD

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EAST BAY MUNICIPAL UTILITY DISTRICT
2020 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:

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Period covered in this report: **January 1, 2020 to December 31, 2020**

"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."

Eileen M. White
EILEEN M. WHITE, P.E.
DIRECTOR OF WASTEWATER

2/25/21
DATE

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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 (BOD) from organic (carbon-containing) compounds.

Categorical Industry: An industry that must comply with National Categorical Pretreatment Standards as published by EPA.

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

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

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

Closed (CL) Facility: A facility that no longer operates within the EBMUD 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 Wastewater Department of the EBMUD or his/her designated representative.

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

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

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

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

Federal Categorical: See Categorical Industry.

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

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

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

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

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

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

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

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

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

New Permit: A Minimization, Estimation, Special Discharge or Pollution Prevention 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.

Optional Permit: A permit that may be issued to dischargers who apply for such permit as cited in the EBMUD Wastewater Control Ordinance, Title IV, Section 1.b.

Pass-Through: Discharge which exits a publicly owned treatment works (POTW) into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge

or discharges from other sources, is a cause of violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) [Ref. 40 Code of Federal Regulations, 403.3(n)].

Publicly Owned Treatment Works (POTW): A treatment works as defined by Section 212 of the Clean Water Act, which is owned by the District. This definition includes any District-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 District-owned sewers, pipes and other conveyances that convey wastewater to that portion of the POTW which is designed to provide treatment (including recycling and reclamation) of municipal sewage and industrial waste.

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

Reclassified (RC): An IU regulated under a Minimization (federal categorical or local), Estimation or Pollution Prevention Permit that becomes regulated under a different one of these permits.

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.

Reissued (RI): Existing P2 Permits that are renewed.

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

Satellite: Seven East Bay wastewater collection system agencies which comprise: City of Alameda, City of Albany, City of Berkeley, City of Emeryville, City of Oakland, City of Piedmont, and Stege Sanitary District.

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: A significant industrial user (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 sixty-six 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 hazardous waste through a change in raw materials or product reformulation (material substitution), or operational or process improvements (process modification).

Special Discharge Permit: Mandatory permit for unique or intermittent discharges that do not require a Discharge Minimization Permit. May include reporting and monitoring requirements.

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

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

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

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

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

Wastewater Control Ordinance: See EBMUD Wastewater Control Ordinance.

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

Waste Minimization: See Pollution Prevention.

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

Wet Weather Facility: 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

FY: Fiscal Year

IC: Inconsistent Compliance

IU: Industrial User

MGD: Million gallons per day

MWWTP: Main Wastewater Treatment Plant

N: New

NOV: Notice of Violation (Violation Notice)

NPDES: National Pollutant Discharge Elimination System

NSCIU: Non-Significant Categorical Industrial User

POTW: Publicly Owned Treatment Works

RC: Reclassified

RCRA: Resource Conservation and Recovery Act

RI: Reissued

RWQCB: The 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 2020 report includes the Pretreatment Annual Report. EBMUD's pollution reduction activities for 2020 can be found in the Annual Pollution Prevention Report (submitted separately).

1.1 EBMUD Background Information

The East Bay Municipal Utility District (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). The dry weather influent flow rate ranges between 50 and 60 MGD.

1.2 Applicable Interagency Agreements

EBMUD approved its original wastewater control ordinance in 1973, which established wastewater quality standards for all wastewater discharges into community sewers discharging to the EBMUD interceptor system. The wastewater control ordinance has been updated and revised

several times over the years, and the current version (revised in 2013) is available on EBMUD's website.

1.3 Pretreatment Compliance Inspection/Audit Summary

A Pretreatment Compliance Audit (PCA) was conducted on January 28-29, 2019, by contractor PG Environmental, acting on behalf of the 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 2020, 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 R2-2015-0018 became effective on July 1, 2015, and expired on October 31, 2020, after an administrative extension. 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 2020, and the MWWTP performed as expected.

2.3 Influent, Effluent and Biosolids Monitoring Procedures and Results

For all sampling procedures, documentation of the maintenance of chain-of-custody, sampling containers, sample transport, sample acceptance criteria, sample preservation and hold times are met by the EBMUD laboratory in accordance with EPA recommended guidelines and the National Environmental Laboratory Accreditation American National Standards Institute (NELAC ANSI) TNI 2016.

Influent, Effluent and Biosolids Sampling Procedures

- **Metals:** Influent and effluent samples collected for metals are twenty-four hour flow proportioned composites collected via an ISCO autosampler into polyethylene containers and are held at 4^{o}C during sample collection. Sample collection and transport on ice is documented on the field chain-of-custody form. Following relinquishment to the EBMUD laboratory and verification that sample acceptance criteria have been met, a subsample of the composite is poured off into a certified container and preserved to pH < 2 with trace metals grade nitric acid.
- **Cyanide:** Cyanide samples are collected from a dedicated grab sampling tap at each station facility. Influent and effluent cyanide grab samples are collected in a certified dark brown plastic container to prevent ultraviolet light penetration. The influent sampling container includes sodium thiosulfate as a dechlorinating agent. At the point of sample

collection, samples are preserved in the field with sodium hydroxide (NaOH) to pH > 10 and documented on the field chain-of-custody form. For the effluent, the cyanide grab sample is collected from a dechlorinated source and does not require a dechlorinating agent. The certified dark brown plastic container is pre-dosed with NaOH. Following documented transport on ice, sample and chain-of-custody relinquishment, the laboratory documents verification of dechlorination and pH > 10 on the chain-of-custody record.

- **EPA 624, 625:** Samples collected for volatiles (EPA 624/VOC) and semi-volatiles (EPA 625/BNA) are collected from a dedicated grab sampling tap. EPA 624 samples are collected in 40 milliliter certified organic-free vials with Teflon septa. Care is taken to avoid aeration and headspace during the collection of the grab samples. Sample vials contain sodium thiosulfate as a dechlorinating agent, and traceable hydrochloric acid (HCl) is added in the field to adjust the pH for sample preservation. For the determination of Acrolein by EPA 624, samples are collected in separate certified vials that contain sodium thiosulfate, yet are not preserved by acidification to prevent the loss of the analyte of interest. Sample acceptance criteria verifying zero head-space is documented on the chain-of-custody. EPA 625 samples are collected in certified organic-free one-liter amber containers with ascorbic acid added as a dechlorinating agent.
- **Biosolids:** Grab samples of dewatered centrifuge cake are collected in certified organic-free quart jars every six hours over a five-day period and documented on the field chain-of-custody form. Biosolids samples are stored at 4^{o}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.

Influent, Effluent and Biosolids Sampling Results

The majority of organic priority pollutant compounds were non-detect in both influent samples analyzed in 2020. Results for priority pollutant compounds detected in one of the two samples are summarized in Table A and Table B. If a priority pollutant was detected in one of the samples, the non-detect value is also included in the tables.

Table A: Priority Pollutant Volatile Organics (EPA Method 624)
Influent Monitoring

Parameter	2/05/20 Result (µg/l)[1]	Qualifier[2]	8/05/20 Result (µg/l)	Qualifier[2]
Bromomethane	**<7.42**	U	**4.49**	
Chloroethane	**<3.28**	U	**2.28**	
Chloroform	**6.55**		**13.4**	
Toluene	**2.76**	E	**3.71**	
Chloromethane	**<3.44**	U	**8.87**	

[1] µg/l = micrograms/liter
[2] U - Not detected; E - Estimated value, concentration outside calibration range

Table B: Priority Pollutant Semi-Volatile Organics (EPA Method 625)
Influent Monitoring

Parameter	2/24/20 Result (µg/L)	Qualifier[1]	8/5/20 Result (µg/L)	Qualifier[1]
3-,4-Methylphenol	**64**		**52**	
Benzoic Acid	**250**		**470**	
Benzyl Alcohol	**16**		**25**	
Bis(2-ethylhexyl) phthalate	**<17**	U	**7.3**	
Diethyl phthalate	**<8.9**	U	**2.2**	
Dimethyl phthalate	**<0.76**	U	**0.25**	E
Naphthalene	**0.13**	E	**<0.021**	U
Phenol	**8.7**		**11**	
Pyridine	**<6.4**	U	**1.2**	

[1] U - Not detected; E - Estimated value, concentration outside calibration range

Quarterly effluent monitoring for Polychlorinated Biphenyls (PCBs), as congeners, as required by Order R2-2017-0041, was completed for this reporting period. Results were within normal range based on past monitoring. Quarterly effluent monitoring in 2020 for hexachlorobenzene was completed per Table E-3 of Order R2-2015-0018, and the results were non-detect. 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 and was reported in 2016 for Order R2-2015-0018.

Table C summarizes the analytical results for 2020 influent and effluent metals and cyanide. Figure A illustrates influent and effluent metals monitoring results for the past five years located on pages 33 to 38 of this report. Influent and effluent metals results for the reporting period were at or below average metals concentrations over the last five years.

Table C: 2020 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	2.98	2.43	2.88	2.32	2	2.28	3.18	2.25	1.98	2.33	3.5	4.2
	Effluent	EPA 200.8	2.7	1.6	1.7	1.5	1.6	1.8	2.8	1.8	1.9	1.9	2.27	3
Cadmium	Influent	EPA 200.8	0.24	0.38	0.22	0.24	0.25	0.29	0.36	0.26	0.26	0.25	0.29	0.22
	Effluent	EPA 200.8	0.04	0.05	0.04	0.05	0.05	0.09	0.05	0.04	0.18	0.03	0.16	0.1
Chromium	Influent	EPA 200.8	4.23	4.48	3.6	4.4	4.25	4.68	5.04	4.1	2.99	3.93	4.2	2.78
	Effluent	EPA 200.8	0.64	0.67	0.64	0.8	0.69	0.68	0.6	0.79	0.67	0.74	0.69	0.67
Copper	Influent	EPA 200.8	63.5	80.75	65.5	69.6	70	83.5	80.6	76	64.82	77	80.5	76
	Effluent	EPA 200.8	8.55	5.1	5.8	8.3	8.1	7.2	5.9	5.9	5.7	7.5	6.7	9.7
Cyanide	Influent	SM4500-CN C, E	0.8	3.6	0.8	3.2	2.4	2.3	2.4	0.8	1.8	0.8	0.9	0.9
	Effluent	SM4500-CN C, E	0.8	3.1	2.7	3.6	3.3	4.1	3.6	0.8	0.8	0.8	0.9	0.9
Lead	Influent	EPA 200.8	5.53	6.85	5.18	5.54	5.55	6.63	7.3	5.75	4.02	5.35	12.23	4.78
	Effluent	EPA 200.8	0.43	0.35	0.39	0.4	0.39	0.44	0.35	0.45	0.38	0.43	0.47	0.54
Mercury	Influent	EPA 245.1	0.093	0.82	0.1408	0.0738	0.074	0.1303	0.1262	0.1575	0.116	0.1525	0.2675	0.0744
	Effluent	EPA 1631	0.0031	0.0028	0.0019	0.0026	0.0027	0.0025	0.0027	0.0027	0.0016	0.0049	0.0038	0.0028
Nickel	Influent	EPA 200.8	7.08	7.6	7.25	7.78	7.9	8.35	8.38	7.7	6.78	8.93	8.68	7.54
	Effluent	EPA 200.8	4.3	4.1	4.8	4.7	4.6	5.5	5.2	4.5	5.7	5.3	5.97	6.7
Selenium	Influent	EPA 200.8	1.25	1.55	1.1	1.28	1.38	1.48	1.38	1.13	1.14	1.35	1.43	1.18
	Effluent	EPA 200.8	0.41	0.32	0.37	0.45	0.6	0.5	0.46	0.45	0.56	0.5	0.43	0.61
Silver	Influent	EPA 200.8	0.49	0.52	0.31	0.36	0.5	0.72	0.37	0.38	0.39	0.4	0.51	0.36
	Effluent	EPA 200.8	0.05	0.04	0.05	0.05	0.06	0.07	0.06	0.05	0.04	0.04	0.06	0.06
Zinc	Influent	EPA 200.8	152.5	200	162.5	164	172.5	202.5	198	177.5	154.8	180	190	152
	Effluent	EPA 200.8	44	36	50	54	50	50	37	45	44	34	40.33	49.5

Note: Influent results are averaged over each month.

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

EBMUD produces Class B biosolids with an average of 23 percent total solids. Biosolids are collected in an enclosed air-scrubbed hopper that consists of three bins, each with a capacity of 200,000 pounds or 150 cubic yards. Table D presents the results for detected parameters from the two rounds of 5-day composite biosolids sampling in 2020. All other parameters were non-detect. All results, when converted to dry ton basis, are significantly below the ceiling concentrations for the use and disposal for land application as outlined in 40 CFR Part 503. Metals concentrations were consistently low during both the wet and dry weather sampling.

Table D: 2020 Biosolids Monitoring Detected Parameters (mg/kg)

Dewatering Method:	**Centrifuge**		**Centrifuge**		**Ceiling Concentrations**
Season:	**Wet Season**		**Dry Season**		
Sample Dates:	**02/03/2020-02/07/2020**		**07/20/2020-07/24/2020**		
Units (Percent Solids):	**mg/kg-wet (25%)**		**mg/kg-wet (25%)**		**mg/kg (dry weight)**
Method Parameter	**Result**	**Qualifier[1]**	**Result**	**Qualifier[1]**	**40 CFR 503.13**
EPA 6010B					
Antimony	**0.38**	J	**1.64**		None
Arsenic	**1.3**	J	**<0.526**	U	75
Barium	**74**		**43.3**		None
Beryllium	**0.05**	J	**0.033**		None
Cadmium	**0.6**		**0.369**		85
Chromium	**13**		**10.2**		None
Cobalt	**1.3**		**1.18**		None
Copper	**130**		**94.1**		4,300
Lead	**11**		**8.17**		840
Molybdenum	**2.5**		**1.76**		75
Nickel	**10**		**6.54**		4,20
Silver	**0.77**	J	**0.632**		None
Selenium	**1.4**	J	**2.67**		100
Vanadium	**6.1**		**3.99**		None
Zinc	**220**		**181**		7,500
EPA 7471A					
Mercury	**0.14**	J	**0.093**	J	57
EPA 9010					
Cyanide: Total	**<0.7**	U	**34**		None
EPA 8260B					
2-Butanone	**0.91**		**0.47**	J	None
P-isopropyl toluene	**0.44**		**0.35**		None
EPA 8270C					
Bis(2-ethylhexyl)phthalate	**6.5**		**6.4**		None
Phenol	**14**		**7.2**		None
EPA 9034					
Sulfide: Total	**1,000**	H	**630**		None

[1]H - Samples analyzed out of hold time; U - Not detected; J - Detected below reporting limit, result is estimated

In 2020, 100 percent of the 69,613 wet tons of biosolids produced were beneficially reused in the following three ways: 64 percent as soil amendment at land application sites, 28 percent for landfill alternative daily cover, and 8 percent for composting. Table E provides the amount of biosolids in wet tons for each of the three reuse categories by month.

Table E: 2020 EBMUD Biosolids Hauling and End Use by Month (Wet Tons)

Month	Alternative Daily Cover	Compost	Land Application	Monthly Total
January	2,316	2,852	571	5,739
February	3,985	1,597	816	6,398
March	4,951	280	1,428	6,659
April	0	535	5,081	5,615
May	0	0	5,831	5,831
June	0	0	5,138	5,138
July	0	0	4,805	4,805
August	0	0	5,540	5,540
September	0	0	6,010	6,010
October	0	0	5,729	5,729
November	3,670	0	2,104	5,774
December	4,782	0	1,593	6,375
Totals	**19,704**	**5,264**	**44,645**	**69,613**

2.5 Plant Operating Data

Table F presents key MWWTP operating data for 2020. Effluent Carbonaceous Biological Oxygen Demand (cBOD), TSS, and pH were compliant with NPDES permit effluent limitations.

Table F: Wastewater Treatment Plant Operating Data 2020

FLOW DATA	Units	Jan	Feb	Mar	April	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Total	Avg	Min	Max
Daily Average	MG	55	49	50	50	46	45	46	46	44	43	44	45		47	43	55
Minimum Day	MG	45	47	46	45	43	41	42	25	41	42	41	42		42	25	47
Maximum Day	MG	112	53	73	78	59	48	53	63	47	45	52	61		62	45	112
Monthly Total	MG	1,709	1,411	1,551	1,499	1,437	1,336	1,425	1,428	1,317	1,338	1,306	1,401	17,158	1,430	1,306	1,709
INFLUENT QUALITY																	
cBOD (avg.)	mg/l	361	495	336	371	402	421	422	346	379	335	371	318		380	318	495
TSS (avg.)	mg/l	482	787	345	408	404	471	465	390	628	389	466	397		469	345	787
pH (avg.)	pH	6.6	6.6	6.5	6.6	6.5	6.5	6.4	6.5	6.6	6.5	6.6	6.8		6.6	6.4	6.8
EFFLUENT QUALITY																	
cBOD (avg.)[1]	mg/l	10	8	8	9	14	10	11	8	8	8	8	9		9	8	14
TSS (avg.)[2]	mg/l	15	9	9	10	13	13	10	13	13	12	10	13		12	9	15
pH (avg.)[3]	pH	6.8	6.8	6.8	6.9	6.9	6.8	6.8	6.8	6.8	6.7	6.9	6.9		6.8	6.7	6.9
OVERALL REMOVAL EFFICIENCY																	
cBOD[4]	%	97	98	98	98	97	98	97	98	98	98	98	97		98	97	98
TSS[4]	%	98	99	97	98	97	97	98	97	98	97	98	97		98	97	99

[1] Effluent limitations for cBOD = 25 mg/L average monthly, 40 mg/L average weekly

[2] Effluent limitations for TSS = 30 mg/L average monthly, 45 mg/L average weekly

[3] Effluent limitations for pH = instantaneous minimum: 6.0, instantaneous maximum 9.0

[4] The average monthly percent removal of cBOD and TSS shall not be less than 85%

3. PRETREATMENT PROGRAM - GENERAL INFORMATION

Through its Pretreatment Program, EBMUD regulates process wastewater discharges from identified industrial users (IUs) that handle pollutants of concern. Pollutant control mechanisms include the issuance of wastewater discharge permits with general provisions and site-specific requirements. Descriptions of EBMUD's permit categories are provided in Section 3.3.

In 2020, there were no significant changes or planned modifications to EBMUD's Pretreatment Program including its legal authority, local limits, monitoring/inspection program and frequency, enforcement protocol, administrative structure, resource requirements, and funding mechanism. Additionally, no significant element of EBMUD's Pretreatment Program is in the process of being modified. Detailed information on the permitted accounts and monitoring is provided in Chapter 4.

3.1 Pretreatment Program Staffing and Budget

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

- **Industrial Discharge:** works with industries, commercial businesses and residences to reduce the discharge of pollutants to the community sewer and ultimately the Bay. Also manages the implementation of the Regional Private Sewer Lateral Program, which mandates maintenance of private sewer laterals to reduce inflow and infiltration into the collection systems. In 2020, one Wastewater Control Representative position made vacant by a retirement was filled by promoting internal staff. The manager of the pretreatment program, the Supervising Wastewater Control Representative, did not change during the reporting period.
- **Resource Recovery (R2):** uses excess wastewater treatment capacity to provide an environmentally-friendly and economical disposal alternative for customers, and to increase the MWWTP's production of biogas that is used for power generation.
- **Field Services:** supports the Industrial Discharge, R2, and Infiltration & Inflow programs by performing site inspections and sampling. Two vacant Wastewater Control Inspector positions were filled in early 2020.

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 2021 (July 1, 2020 to June 30, 2021) is summarized in Table G. The budget specifically for pretreatment program activities is approximately 15 percent of the total Environmental Services Division budget.

Table G: Environmental Services Division Budget – Fiscal Year 2021

Expenditures	Dollars ($)
Personnel	$5,437,000
Equipment, Operations & Maintenance, Training & Travel	$274,000
Contracted Services	$91,000
Total	**$5,802,000**

3.2 Permit Classifications

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

Table H: Permit Classifications and Number of Permits

Permit Classification	Permit Description	No. Permits as of 12/31/2020
Categorical Industrial Users (CIUs) • CIU >5,000 gpd • CIU – Middle Tier ≤5,000 gpd	Industries that discharge process wastewater from specific industry categories subject to Federal categorical pretreatment standards	3[1]
Non-Categorical Significant Industrial Users	Industries that are exempt from the Categorical Pretreatment Standards, but use >25,000 gallons per day	6[2]
Non-Significant Categorical Industrial Users (NSCIUs)	Categorical industrial users that never discharge more than 100 gallons per day of total categorical wastewater	1
Non-Significant Industrial Users	Industries that discharge pollutants of local concern	20
Zero Discharger	Categorical industrial users that never discharge process wastewater	19

[1] One CIU, and two Middle Tier CIUs

[2] Three Non-Categorical SIUs were declassified in 2020. See Table L.

3.3 Inspection and Sampling Procedures

In 2020, there were no changes to EBMUD's inspection and sampling procedures for the Pretreatment Program. This section outlines the types of inspections and sampling performed by EBMUD in support of the pretreatment program.

3.3.1 Inspection/Monitoring/Sampling Frequencies

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

Table I: EBMUD Minimum Inspection/Monitoring Frequency

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

3.3.2 Industrial User (IU) Inspections

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

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

Pre-Inspection

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

Inspection

1. Take grab samples and install autosampler upon arrival.
2. Read water service meters and sub-meters.
3. Interview the facility contact to determine the level of production, types of products and wastes currently being generated, the status of any pretreatment system, and to answer specific questions listed in the inspection program.
4. Conduct a walk-through of the facility with the facility contact. Verify information obtained in the interview.
5. Observe facility operations.
    - Compare observations with information in the permit and from the contact interview.
    - Verify plant layout and update as necessary.
    - Observe wastewater flow and make visual assessment of discharge quality.
    - Evaluate the potential for accidental spills to wastewater stream. Every two years, conduct Slug Control Plan Evaluation to determine if the facility needs a Slug Control Plan.

- Document secondary water uses such as boilers, air scrubbers, cooling water, and clean-up.
- Review private meter calibration records.

6. Inspect Pretreatment System. Determine if:
   - System is functioning
   - Necessary chemicals are in inventory
   - Routine preventive maintenance procedures are being performed and by whom
   - A contingency plan is in place in the event of a treatment system failure
   - Operating records are up to date
7. Review self-monitoring procedures with responsible personnel annually, including sampling frequency, sampling methods, sampling location, and chain-of-custody.

Post-Inspection

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

3.3.3 ZD and NSCIU Inspections

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

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

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

Pre-Inspection

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

Inspection

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

Post-Inspection

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

3.3.4 Violation Follow-Up Inspections

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

3.4 Resource Recovery (R2) Program

EBMUD's R2 Program manages the disposal of permitted trucked materials to EBMUD's MWWTP. Since its inception, the R2 Program has established 470 customer accounts; currently 238 accounts are active, holding 429 active waste disposal permits. The R2 Program uses available excess capacity at the MWWTP. It provides a cost-effective, economically-sound disposal alternative for customers, it increases the MWWTP's production of methane gas that is used to generate renewable electricity used at the MWWTP, with excess electricity sold to the Port of Oakland.

Materials hauled to the MWWTP are non-hazardous and include residential and commercial septage; food and beverage industry wastes and wastewaters, including winery and brewery, dairy, bakery, vegetable oil, and high total dissolved solids waste, animal process waste, food grade fats, oils, and greases; municipal – industrial water and wastewater wastes; sludges;

groundwater; and stormwater. Exhibit A summarizes trucked materials and volumes delivered in 2020.

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

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

3.6 Local Limits

In 2020, there were no changes to EBMUD's local limits. EBMUD's current local discharge limits can be found in the Ordinance, Title II, Section 3 (a) through (f) and are shown in Exhibit C.

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 2020 can be found in the Annual Pollution Prevention Report (submitted separately).

4. PRETREATMENT PROGRAM - INDUSTRIAL USER INFORMATION

4.1 Updated List of Regulated Significant Industrial Users (SIUs)

Table J and Table K list all of the SIU facilities with active EBMUD permits as of December 31, 2020. Table L lists SIUs that were declassified in 2020.

Table J: Categorical SIU List

Company Name[1]	**Permit No.**	**Address**	**City**	**Reason SIU**[2]
Fryer Industries Inc/ dba Dougco – Metal Finishing	26414503	1073 34th St.	Oakland	40 CFR 433.17
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 Waste Stream formula for any of the three CIUs

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

Table K: Non-Categorical SIU List

Company Name & Business Description	**Permit No.**	**Address**	**City**	**Reason SIU**[1]
Aramark Uniform Services – Industrial Laundry	03300801	330 Chestnut St.	Oakland	>25,000 gpd
Port of Oakland – Oakland International Airport – Air Transportation and Aviation Support Services	17300332	Doolittle and Airport Dr.	Oakland	>25,000 gpd
Safeway Beverage Plant – Carbonated Beverage Manufacturer	05900451	1921 San Joaquin St.	Richmond	>25,000 gpd
Schnitzer Steel Products – Scrap Metal Recycler	77783210	1101 Embarcadero West	Oakland	>25,000 gpd
SVC Manufacturing –Gatorade Beverage Manufacturer	50367682	5625 International Blvd.	Oakland	>25,000 gpd
Takara Sake – Wine and Spirit Manufacturer	10600278	708 Addison St.	Berkeley	>25,000 gpd

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

Table L: SIU Permits Active in 2020, Declassified as of December 31, 2020

Company Name	Permit No.	Address	City	Reason Declassified
Bayer Corporation – Pharmaceutical Manufacturer	10600333	4th and Parker St.	Berkeley	Maintained consistent permit compliance and no longer discharges >25,000 gpd
Lawrence Berkeley National Laboratory - Laboratory	06600791	1 Cyclotron Rd.	Berkeley	Maintained consistent permit compliance and no longer discharges >25,000 gpd
Regents of the University of California, Berkeley – University Campus	06600592	Berkeley Campus	Berkeley	Maintained consistent permit compliance and no longer discharges >25,000 gpd

4.2 Monitoring Report Update

No new SIUs were added to the Pretreatment Program in 2020; therefore there is no Baseline Monitoring Report update.

4.3 July-December Semiannual Data

The Semiannual Pretreatment Data for the period of July 2020 through December 2020 was prepared in accordance with Order No. R2-2015-0018, NPDES Permit No. CA0037702 and is presented in Exhibit E. The facility listed was in violation during the January through July 2020 semiannual reporting period.

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 2020.

4.5 Compliance Activities for SIU Regulated Facilities

See Exhibit F through Exhibit H for a summary of the compliance activities for SIUs.

Exhibits

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

Category	Material Type	Description	Gallons in 2020
Septage	Septage	Domestic sewage from septic tanks and portable toilets.	22,386,000
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.	6,382,000
	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.	81,374,000
	Winery processing (high strength) waste	High strength winery processing waste water, 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 lungs waste contains some pathogens in quantities similar to the MWWTP's influent waste stream.	
	Beef, sheep, and swine processing waste	High strength waste consisting of beef, sheep, and swine blood. Waste contains some pathogens similar to the MWWTP's influent stream.	
	Alkaline Hydrolysis	High strength waste consisting of dissolved organic matter from expired animals.	

Industrial	Non-contact process water	Non-contact process cooling water from equipment testing, cleaning, or cooling towers. Waste contains contaminants consistent with the MWWTP's influent waste stream.	100,424,000
	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.	
	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 waste water. 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.	9,406,000

Exhibit B: Enforcement Response Plan Summary

<table>
<tr><th colspan="2">Informal Action</th></tr>
<tr><td colspan="2">
• Informal Notice
• Informal Meeting
• Notice of Violation/Follow-Up Fees:[1]
  o Reporting/Non-Discharge Violation: Stage One, $730
  o Discharge Violation, Stage Two: $1,550*
  o Discharge Violation under Director's Order, Stage Three: $3,190*
*does not include testing fees
</td></tr>
<tr><th colspan="2">Formal Action

Administrative</th></tr>
<tr><td>
Director's Orders
• Schedule of Remedial or Preventive Measures
• Cease and Desist Orders
• Facility Damage Cost Recovery
• Termination of Service
</td><td>
Director's Enforcement Remedies and Penalties
• Civil Liability Complaints
• Civil Liability Penalties
  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">Formal Action

Judicial</th></tr>
<tr><td>
Criminal Penalties
• Intentional Discharge in Violation of Director's Order Resulting in Pollution: Misdemeanor, $1,000/day

• Reporting Falsified Information/Tampering with Monitoring Devices: $25,000 Fine and/or 6 Months Imprisonment
</td><td>
Civil Enforcement Remedies and Penalties
• Civil Enforcement Penalties
  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, 2020

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

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

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

[2] S.U. – Standard Units

[3] Wastewater with pH greater than or equal to12.5 S.U. (40 CFR 261.22(a)(1)) shall not be discharged.

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

Exhibit D: Wastewater Standards for Categorical Industrial Users

Metal Finishing Category-40 CFR 433.17, New Source				Limits (mg/L)			
	Permit	BMR	BMR		Federal		EBMUD
Industry Name	Exp. Date	Due Date	Accepted	Parameter	Daily Maximum	Maximum Monthly Average	Local
Fryer Ind. dba Dougco	6/30/2025	1/15/1990	2/8/1990	Arsenic	-	-	2
Scientific Platers	6/30/2025	12/3/1997	12/23/1997	Cadmium	0.11	0.07	1
				Chromium	2.77	1.71	2
				Copper	3.38	2.07	5
				Cyanide	0.86	0.32	-
				Cyanide (Total)	1.2	0.65	5
				Iron	-	-	100
				Lead	0.69	0.43	2
				Mercury	-	-	0.05
				Nickel	3.98	2.38	5
				Oil and Grease	-	-	100
				pH	-	-	Not <5.5
				Phenols	-	-	100
				Silver	0.43	0.24	1
				Temperature	-	-	150°F
				TICH	-	-	0.5
				Total Metals	-	-	-
				TTO	2.13	-	-
				Zinc	2.61	1.48	5

Transportation Equipment Cleaning Category - 40 CFR 442.15				**Limits (mg/L)**		
Industry Name	**Permit Exp. Date**	**BMR Due Date**	**BMR Accepted**	**Parameter**	**Federal Daily Maximum**	**EBMUD Local**
Harkrader Trucking (HTI)	1/24/2023	**	**	Non-Polar material (SGT-HEM)		100
				Arsenic	-	2
				Cadmium	-	1
				Copper	0.84	5
				Chromium	-	2
				Cyanide: Total		5
** HTI was not required to submit a BMR. All information required in a BMR was submitted by HTI in past periodic reports and permit applications.				Iron	-	100
				Lead	-	2
				Mercury	0.0031	0.05
				Nickel	-	5
				Oil and Grease	-	100
				pH	-	Not<5.5
				Phenols		100
				Silver	-	1
				Temperature	-	150°F
				TICH	-	0.5
				Zinc	-	5

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

Significant Industrial User - Non-categorical (Local)									
Facility Name, Permit Number and Address	**Semi-Annual Compliance Status[1]**				**Date of Violation**	**Sample By POTW/IU[2]**	**Parameter**	**Result(s) (S.U.)**	**Local Discharge Limit (S.U.)**
	Current		**Previous**						
	Q4	**Q3**	**Q2**	**Q1**					
	2020	**2020**	**2020**	**2020**					
SVC Manufacturing 5625 International Blvd, Oakland, CA 94621	C	C	C	IC	3/31/2020	IU	pH	5.0	Not less than 5.5
Comments on Follow-up, Corrective, or Enforcement Action Taken	On March 31, 2020, SVC reported a slug discharge that violated the local pH limit. On April 3, 2020, SVC submitted a technical report indicating that during a precautionary COVID-19 shut-down, production was stopped with two batch tanks containing 6,000 gallons and 8,000 gallons of Gatorade that had expired. Both batches were dumped simultaneously while the facility was performing external sanitation that sent water to the process drains, which overwhelmed the pretreatment system, causing an overflow. To prevent future discharge violations, SVC coded their existing programmable logic controller to limit dumping capabilities to dumping batches in intervals. EBMUD issued a violation notice April 8, 2020, regarding noncompliance and assessed a Stage 1 violation fee of $700. On September 23 and November 4, 2020, EBMUD staff conducted inspection sampling. Results were in compliance.								

[1] C = Consistent compliance; IC = Inconsistent Compliance;
[2] POTW = Publicly Owned Treatment Works; IU = Industrial User

Exhibit F: SIU Monitoring and Violations Summary

	2020 PERMIT SUMMARY[1]				EBMUD INSPECTIONS	SAMPLING EVENTS			VIOLATIONS			COMPLIANCE STATUS[4]				
	IN EFFECT 12/31/2020	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	2	0	0	0	6	4	2	6	0	0	$0	2	0	0	0	0
40 CFR 442 TRANSPORTATION EQUIPMENT CLEANING	1	0	0	0	3	2	0	2	0	0	$0	1	0	0	0	0
Sub-total for SIU-Categorical	*3*	*0*	*0*	*0*	*9*	*6*	*2*	*8*	*0*	*0*	*$0*	*3*	*0*	*0*	*0*	*0*
Non-Categorical Significant Industrial Users																
BCC 2080 BEVERAGE MANUFACTURE	3	0	0	0	7	4	26	30	1	1	$700	2	1	0	0	0
BCC 3300 PRIMARY METALS MANUFACTURING	1	0	0	0	2	1	2	3	0	0	$0	1	0	0	0	0
BCC 4500 AIR TRANSPORTATION	1	0	0	0	3	4	8	12	0	0	$0	1	0	0	0	0
BCC 7218 INDUSTRIAL LAUNDRIES	1	0	0	0	3	3	3	6	0	0	$0	1	0	0	0	0
Sub-Total for SIU-Local	*6*	*0*	*0*	*0*	*15*	*12*	*39*	*51*	*1*	*1*	*$700*	*5*	*1*	*0*	*0*	*0*
Grand Totals	**9**	**0**	**0**	**0**	**24**	**18**	**41**	**59**	**1**	**1**	**$700**	**8**	**1**	**0**	**0**	**0**

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

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

[3] All types of violations are included in NOVs

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

Exhibit G: Significant Industrial User Compliance Activities - Categorical

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
40 CFR 433 - Metal Finishing										
Fryer Industries Inc./dba Dougco 1073 34th Street Oakland, CA 94608 Permit No. 26414503 Expires: 6/30/2025	4	C	1	1	1	0	0	$0	0	Fryer Industries, Inc./dba Dougco (Dougco) is an existing source metal finishing facility and is subject to 40 CFR 433.17. This facility is considered a middle-tier CIU because the wastewater discharge does not exceed 5,000 gpd. Dougco was in SNC for Q4 2019 for exceeding categorical discharge limitations for chromium and nickel. EBMUD reported the violation in the local newspaper on January 24, 2020. Follow-up samples were collected by EBMUD inspectors on January 17, 2020, and the results for Chromium (0.51 mg/L) and Nickel (0.19 mg/L) were in compliance with discharge limitations. On December 16, 2020, EBMUD inspectors conducted routine sampling. Sample results for Chromium (1.970 mg AW/L) exceeded federal limits. EBMUD issued an NOV on December 24, 2020. On December 28, Dougco notified EBMUD of their intent to protest the sample results. On January 5, 2021, Dougco informed EBMUD of a sampling machine failure observed during the sampling period. On January 19, 2021, EBMUD issued a notice to rescind the NOV and invalidate the sample results. EBMUD will resample.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	1	1	0	0	0	$0	0	
Totals:			2	2	1	0	0	$0	0	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
Scientific Platers, Inc. 9809 Kitty Lane Oakland, CA 94603 Permit No. 14322574 Expires: 6/30/2025	4	C	3	2	0	0	0	$0	0	Scientific Platers, Inc. maintained consistent compliance in 2020. Sampling was not conducted at the first of the three inspections as Scientific Platers was then in the process of installing a new effluent flow meter.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	1	0	1	0	0	$0	0	
Totals:			4	2	1	0	0	$0	0	
Totals for Metal Finishing:			**6**	**4**	**2**	**0**	**0**	**$0**	**0**	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]			Orders	Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees		
40 CFR 442 - Transportation Equipment Cleaning										
Harkrader Trucking, Inc. 9957 Medford Ave. Oakland, CA 96051 Permit No. 50066572 Expires: 1/24/2023	4	C	0	0	0	0	0	$0	0	Harkrader Trucking maintained consistent compliance in 2020. The concentration of oil and grease (hydrocarbon) was above the local and federal discharge limits in the sample collected by EBMUD staff from Harkrader Trucking on October 23, 2019, as part of a routine inspection. EBMUD issued a violation notice on November 18, 2019, along with a violation fee of $1,490. Harkrader Trucking provided EBMUD a corrective action report on December 4, 2019, noting that the carbon filtration system needed to be replaced. Harkrader later reported that the carbon replacement was completed on December 6, 2019. A follow-up sample collected by EBMUD inspectors on December 18, 2019, also had a concentration of oil and grease above the local limit, and a second violation was issued on December 30, 2019, including a violation fee of $1,490. EBMUD conducted a follow-up inspection and sampling on January 30, 2020. The concentration of oil and grease in this sample was below the local limit.
	3	C	1	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	2	2	0	0	0	$0	0	
Totals:			3	2	0	0	0	$0	0	
Totals for Transportation Equipment Cleaning:			**3**	**2**	**0**	**0**	**0**	**$0**	**0**	
Totals:			**9**	**6**	**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 2020

[4] All types of violations are included in NOVs

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

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 2080 - Beverage Manufacture										
SVC Manufacturing 5625 International Blvd. Oakland, CA 94621 Permit No. 50367682 Expires: 11/6/2023	4	C	1	1	2	0	0	$0	0	SVC Manufacturing (SVC) is a Non-Categorical SIU subject to federal and local pH limits. SVC discharges more than 25,000 gpd. SVC performs continuous pH monitoring to control pH levels in compliance with federal and local limits. On March 31, 2020, SVC reported a slug discharge with a low pH of 4.98 S.U. that violated the local limit. On April 3, 2020, SVC submitted a technical report indicating that during a precautionary COVID-19 shut-down, production was stopped with two batch tanks containing 6,000 gallons and 8,000 gallons of Gatorade that had expired. Both batches were dumped simultaneously while the facility was performing external sanitation that sent water to the process drains, which overwhelmed the pretreatment system, causing an overflow. To prevent future discharge violations, SVC will code PLC logic into the batch dumping process and limit dumping capabilities to dump batches in intervals. EBMUD issued a violation notice dated April 8, 2020, regarding noncompliance and assessed a Stage 1 violation fee of $700. On September 23 and November 4, 2020, EBMUD staff conducted inspection sampling. Results were in compliance.
	3	C	2	1	1	0	0	$0	0	
	2	C	0	0	1	0	1	$0	0	
	1	IC	0	0	1	1	0	$700	0	
Totals:			3	2	5	1	1	$700	0	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
Safeway Beverage Plant 1921 San Joaquin Street Richmond, CA 94804 Permit No. 05900451 Expires: 3/31/2021	4	C	0	1	1	0	0	$0	0	Safeway Beverage Richmond maintained consistent compliance in 2020.
	3	C	1	1	0	0	0	$0	0	
	2	C	0	0	1	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals:			1	2	2	0	0	$0	0	
Takara Sake 708 Addison Street Berkeley, CA 94710 Permit No. 10600278 Expires: 6/30/2025	4	C	1	0	7	0	0	$0	0	Takara Sake maintained consistent compliance in 2020.
	3	C	0	0	10	0	0	$0	0	
	2	C	1	0	2	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals:			2	0	19	0	0	$0	0	
Totals for Beverage Manufacture:			**7**	**4**	**26**	**1**	**1**	**$700**	**0**	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
3300 - Primary Metals Manufacturing										
Schnitzer Steel Products 1101 Embarcadero West Oakland, CA 94604 Permit No. 02300311 Expires: 12/31/2023	4	C	1	0	1	0	0	$0	0	Schnitzer Steel Products maintained consistent compliance in 2020.
	3	C	0	0	0	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	1	1	1	0	0	$0	0	
Totals:			2	1	2	0	0	$0	0	
Totals for Primary Metals Manufacturing:			**2**	**1**	**2**	**0**	**0**	**$0**	**0**	
BCC 4500 - Air Transportation										
Port Of Oakland - Oakland International Airport Doolittle & Airport Drive Oakland, CA 94607 Permit No. 17300332 Expires: 8/25/2022	4	C	1	2	2	0	0	$0	0	Oakland International Airport (OIA) Maintained consistent compliance in 2020.
	3	C	2	2	2	0	0	$0	0	
	2	C	0	0	2	0	0	$0	0	
	1	C	0	0	2	0	0	$0	0	
Totals:			3	4	8	0	0	$0	0	
Totals for Air Transportation:			**3**	**4**	**8**	**0**	**0**	**$0**	**0**	

CATEGORY Facility	Qtr[1]	Compl Status[2]	EBMUD Insp	SAMPLES		ENFORCEMENT[3]				Comments
				EBMUD	IU	No. Viols.	No. NOVs[4]	Viol. Fees	Orders	
BCC 7218 - Industrial Laundries										
Aramark Uniform Services 330 Chestnut Street Oakland, CA 94607 Permit No. 03300801 Expires: 11/9/2023	4	C	0	0	2	0	0	$0	0	Aramark Uniform & Career Apparel, LLC maintained consistent compliance in 2020.
	3	C	3	3	1	0	0	$0	0	
	2	C	0	0	0	0	0	$0	0	
	1	C	0	0	0	0	0	$0	0	
Totals:			3	3	3	0	0	$0	0	
Totals for Industrial Laundries:			**3**	**3**	**3**	**0**	**0**	**$0**	**0**	
Totals:			**15**	**12**	**39**	**1**	**1**	**$700**	**0**	

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

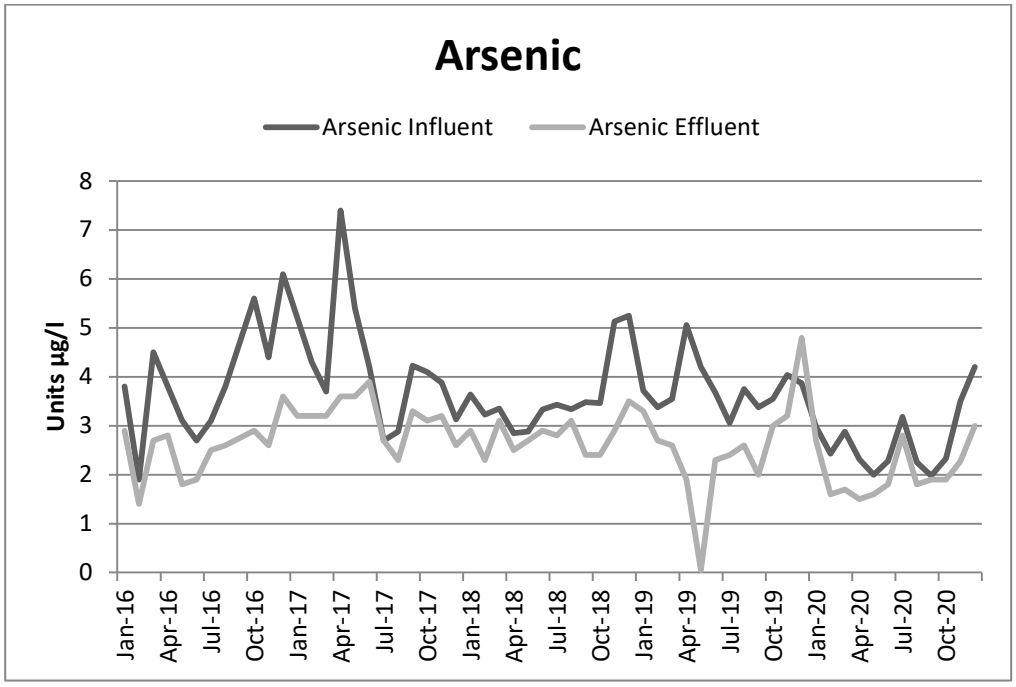
[2] Compliance Status: C - Consistent compliance; IC - Inconsistent Compliance; SNC - Significant Noncompliance

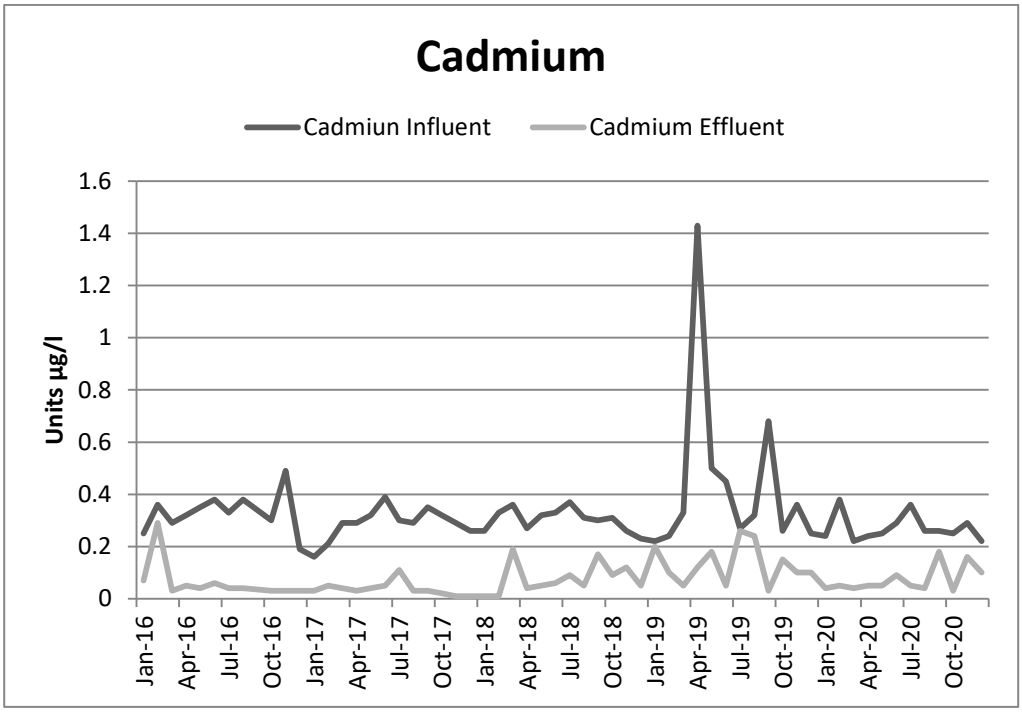
[3] No Administrative Orders, Civil Actions, Criminal Actions, Orders to Restrict/Suspend Discharge to the Discharger or Orders to Disconnect the Discharge from Entering the Discharger were issued in 2020

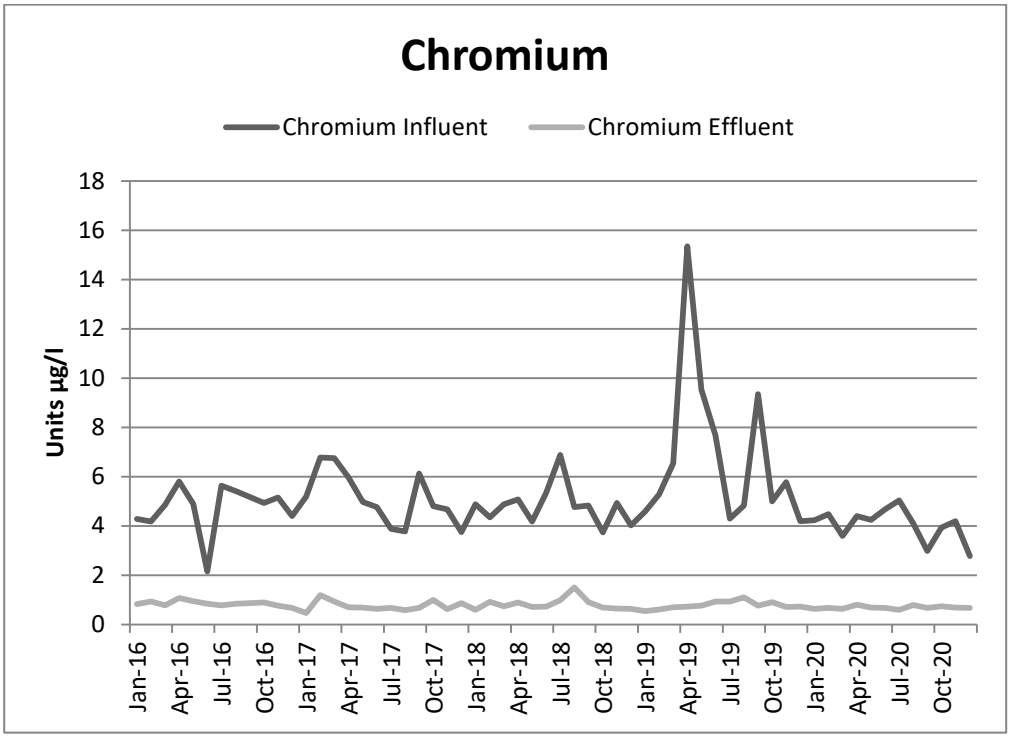
[4] All types of violations are included in NOVs

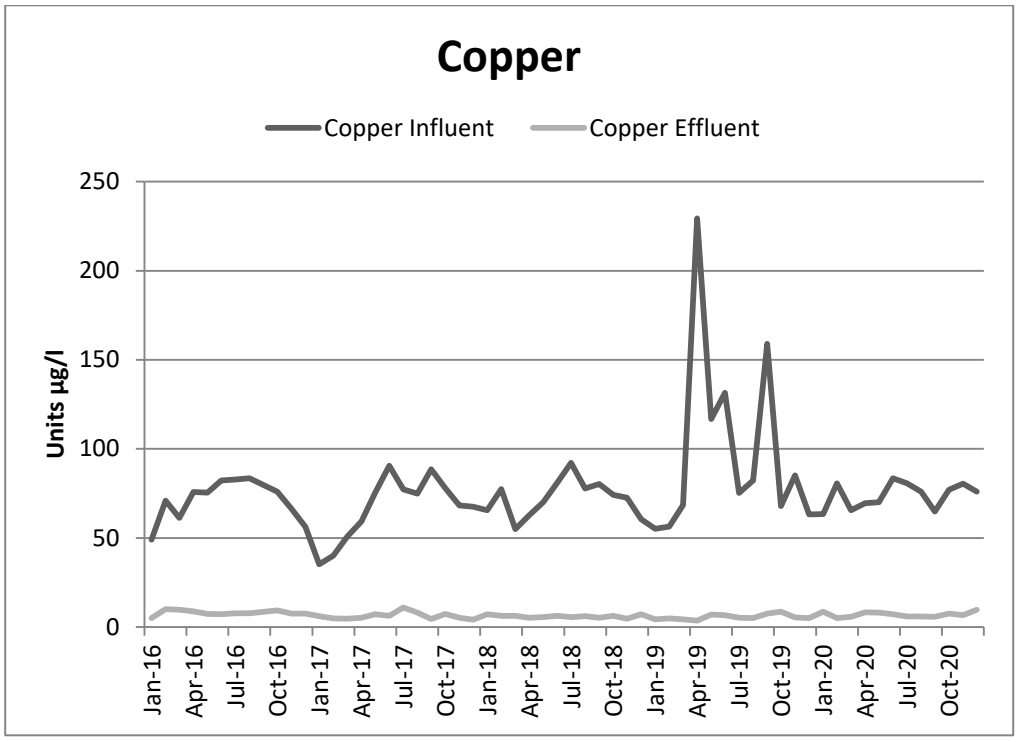
FIGURES

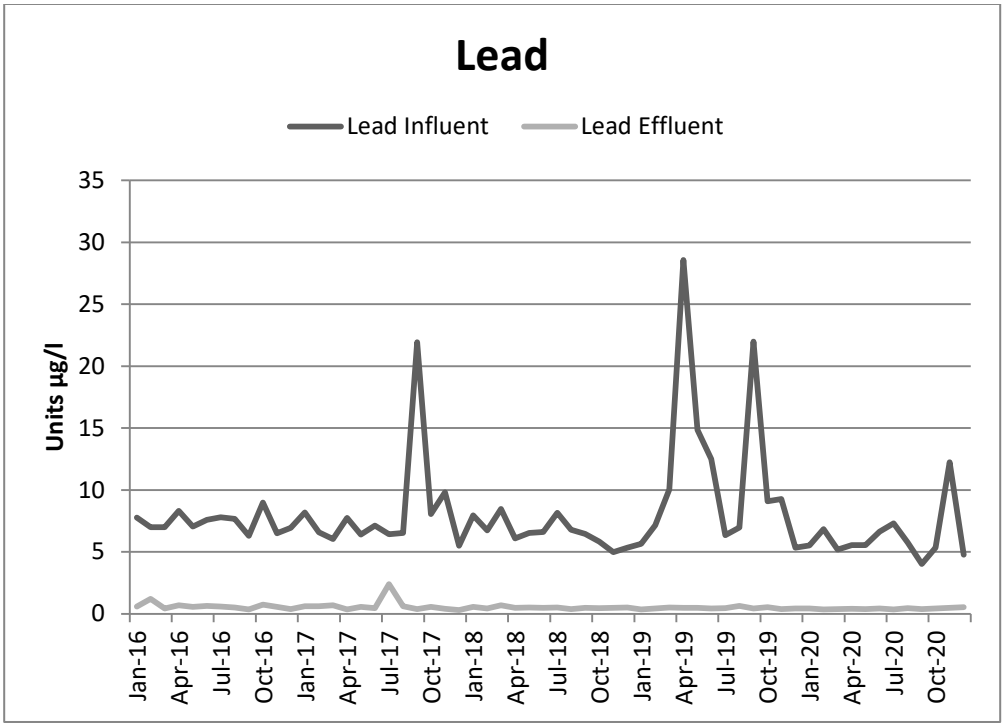
Figure A: Five Year Graph of Metals Influent and Effluent
Influent values are monthly averages

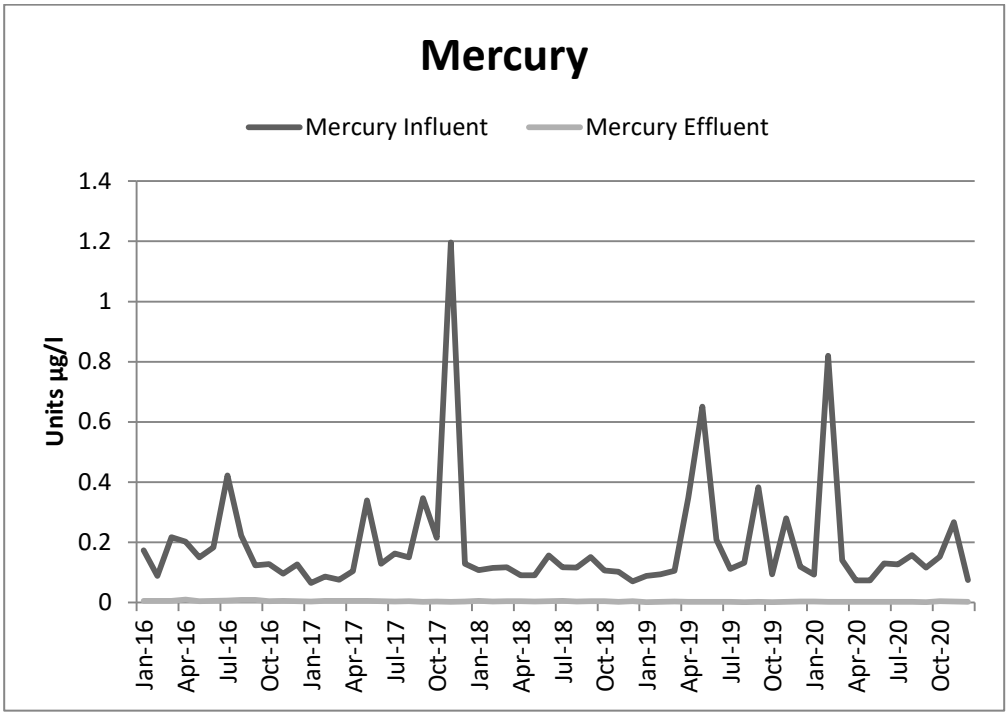


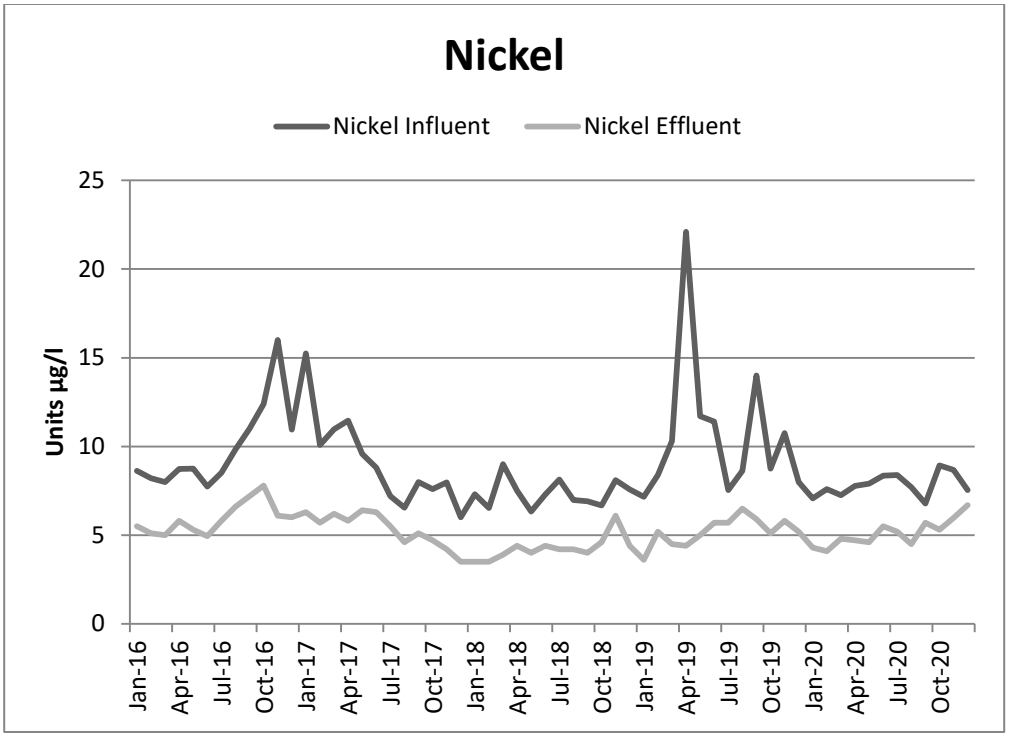


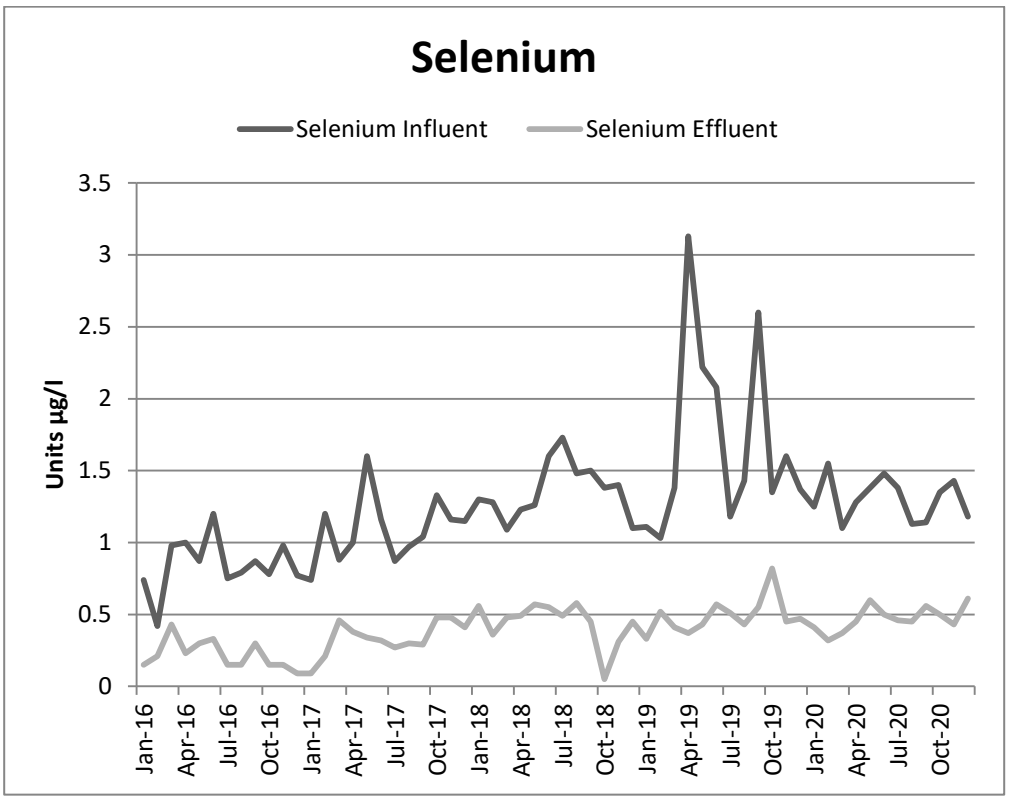

Chromium
Chromium Influent
Chromium Effluent
Units µg/l
18
16
14
12
10
8
6
4
2
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20

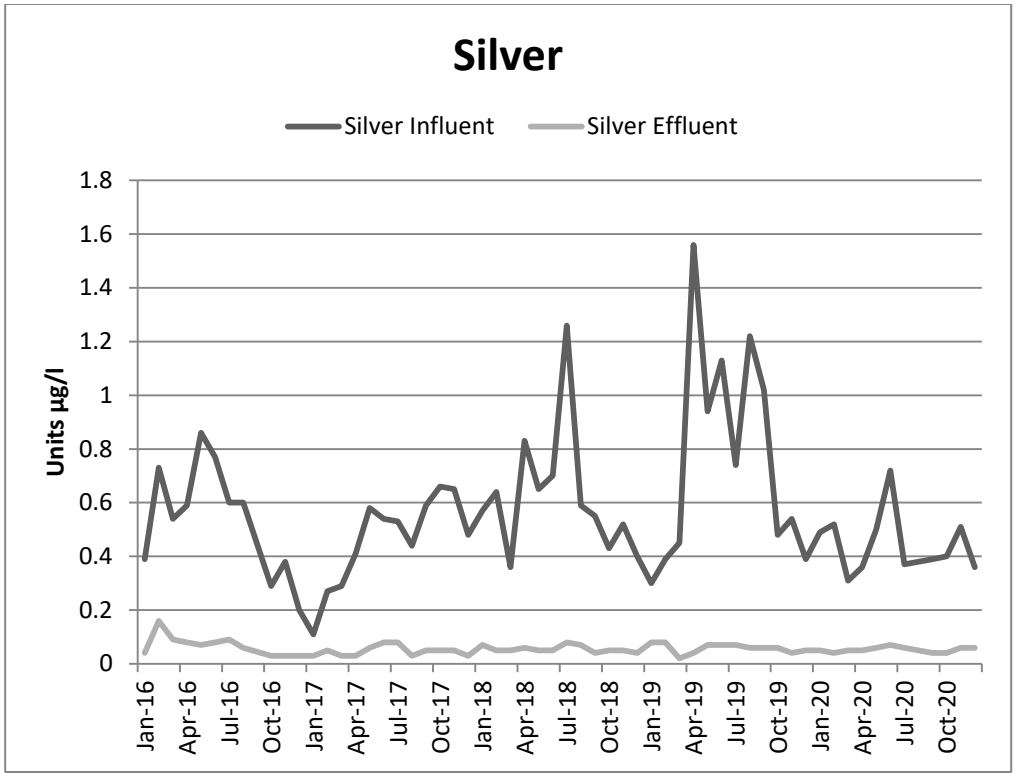

Copper
Copper Influent
Copper Effluent
Units µg/l
250
200
150
100
50
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20

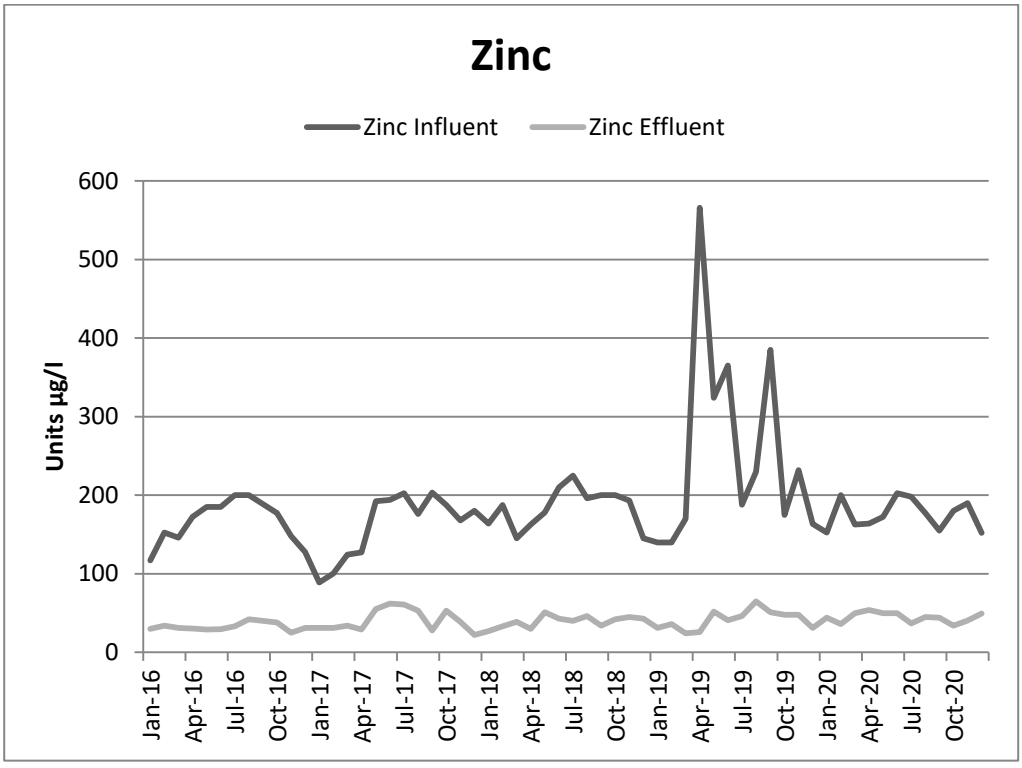

Lead
Lead Influent
Lead Effluent
Units µg/l
35
30
25
20
15
10
5
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20


Mercury
Mercury Influent
Mercury Effluent
Units µg/l
1.4
1.2
1
0.8
0.6
0.4
0.2
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20


Nickel
Nickel Influent
Nickel Effluent
Units µg/l
25
20
15
10
5
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20


Selenium
Selenium Influent
Selenium Effluent
Units µg/l
3.5
3
2.5
2
1.5
1
0.5
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20


Silver
Silver Influent
Silver Effluent
Units µg/l
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20


Zinc
Zinc Influent
Zinc Effluent
Units µg/l
600
500
400
300
200
100
0
Jan-16
Apr-16
Jul-16
Oct-16
Jan-17
Apr-17
Jul-17
Oct-17
Jan-18
Apr-18
Jul-18
Oct-18
Jan-19
Apr-19
Jul-19
Oct-19
Jan-20
Apr-20
Jul-20
Oct-20

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)	01/01/20 12/31/20
4.	SIUs in SNC w/Pretreatment Compliance Schedule	(SSNC)	0
5.	Notice of Violations and Administrative Orders Issued Against SIUs	(FENF)	NOV- 1 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-1

[1]The penalties assessed are the EBMUD Board approved violation follow-up fees that are charged to industrial users to recover EBMUD's costs of enforcement

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EAST BAY
MUNICIPAL UTILITY DISTRICT
375 Eleventh Street, Oakland, CA 94607
1-866-40-EBMUD
ebmud.com