



Water Resource Recovery Facility



2017 Annual Pretreatment Report

GOLETA SANITARY DISTRICT, GSD, REPORT SUMMARY

The District received a new National Pollutant Discharge Elimination System (NPDES) permit which became effective on November 10, 2017. The format of this annual report corresponds with requirements found in the current NPDES Permit # CA0048160, Order NO. R3-2017-0021, Attachment E - MRP, **Section XIII B: Pretreatment Monitoring and Reporting #1 (a - i).**

GSD completed a major upgrade construction project in December 2013 and now provides full secondary treatment to 100% of the wastewater influent. During 2017 GSD provided treatment to an average flow of 4.1 million gallons per day (MGD) and tertiary treatment of 1.2 MGD, which goes out to the community for reclamation irrigation. Discharge of plant effluent to the Pacific Ocean is by means of an outfall discharging at a depth of approximately 93 feet 5800 feet offshore. Community water conservation efforts have resulted in higher strength influent; 2017 analytical results show that GSD's Pretreatment Program continues to be an effective tool in maintaining the quality of wastewater received for treatment and/or reuse of resources.

The current legal authority to enforce the pretreatment program for GSD and Goleta West Sanitary District, GWSD, are provided in the sewer use ordinances; the required legal authorities for Santa Barbara Airport, SBA, are provided for in the City of Santa Barbara Municipal Code Title 16, which designates the GSD Ordinance "as presently enacted or hereinafter amended." Current legal authorities:

1. Goleta Sanitary District Ordinance No. 77
2. Goleta West Sanitary District Ordinance No.13-84

The GSD service area consists of approximately 55,000 people, the majority of connections being residential users. Approximately 4% of the total flows from the service area are from industrial sources. These contributors have been monitored since 1975, when the District initiated its pretreatment program. GSD continues to conduct, on behalf of the City of Santa Barbara Municipal Airport, a pretreatment program for facilities located on airport property; service area for UCSB/SBA has ≈ 9,238 people.

The Goleta West Sanitary District, GWSD, has implemented its own pretreatment program within its service area. The GWSD serves approximately 33,000 people, with approximately 4% of their wastewater originating from industrial waste connections. Their entire influent flow is pumped to the GSD WTPP for treatment.

The information contained in this report includes the following:

- a. **Summary of Analytical Results for GSD's Influent, Effluent, Biosolids & Priority Pollutants**
- b. **Upset, Interference, or Pass-Through Incidents during 2017**
- c. **Updated List of Significant Industrial Users, Additions, Deletions & Information**
- d. **2017 SIU Monitoring and Compliance Status Report**
- e. **Programs to Reduce Pollutants from Non-SIU Industrial/Commercial Users Overview, List of 2017 Industrial Users and Summary of Permit Classification Changes**
- f. **2017 Pretreatment Program Significant Changes**
- g. **2017 Pretreatment Program Budget**
- h. **2017 Public Participation Activities to Inform & Involve the Public**
- i. **Changes in 2017 Biosolids Disposal/Reuse Methods**

ATTACHMENT A: Response to Pretreatment Compliance Inspection, PCI, conducted May 23-24, 2016 by Christine Wong, Tetra Tech Inc.

ATTACHMENT B: Goleta West Sanitary District 2017 Annual Pretreatment Report & PCI Response

a. Summary of Analytical Results for GSD's Influent, Effluent, Biosolids & Priority Pollutants:

Influent/Effluent Metals¹

Twenty four-hour composite samples of influent and effluent were collected monthly and analyzed for metals as required under permit R3-2010-0012 (Table 2-6). The current permit, R3-2017-0021, reduced the metals monitoring requirement from monthly to annually. The concentrations of metals in the effluent for 2017 (Table 2-6) were low or undetected and were well below all permit limitations. Although the wastewater treatment process is not particularly efficient at removing metals, hence the need for the pretreatment program. Metal concentrations in the influent were relatively consistent throughout the year.

Table 2-6. Influent and Effluent Metals (ug/L), Goleta Sanitary District, 2017

	Arsenic	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Silver	Zinc
Influent (ug/L)									
January	1.27	0.248	4.80	137	2.12	0.082	7.58	0.977	150
February	2.07	0.387	4.61	154	4.01	0.103	9.86	0.884	165
March	2.12	0.335	5.80	155	2.09	0.235	9.09	0.629	182
April	2.54	0.866	7.21	283	4.53	0.154	11.1	1.14	386
May	1.48	0.304	3.38	131	1.81	0.067	9.08	2.12	155
June	1.36	0.211	3.39	116	1.88	0.065	7.94	0.093	191
July	1.14	0.297	3.25	50.9	1.74	0.047	7.87	0.071	177
August	1.28	0.412	2.94	139	1.72	0.050	7.42	1.40	160
September	1.95	0.459	3.61	156	5.00	0.141	7.27	1.11	190
October	1.68	0.219	3.46	114	2.23	0.059	7.48	1.21	158
November	2.71	0.240	5.13	146	1.56	0.071	8.79	1.74	170
December	NR	NR	NR	NR	NR	NR	NR	NR	NR
Effluent (ug/L)									
January	0.73	<0.031	0.892	7.10	0.296	0.015	3.84	0.185	32.7
February	1.13	<0.031	0.967	9.31	1.21	<0.002	4.62	0.035	38.0
March	0.920	<0.031	0.661	7.42	0.101	0.017	3.25	<0.022	41.8
April	1.20	<0.031	0.522	7.69	0.112	0.022	3.73	<0.022	37.5
May	1.03	0.033	1.010	4.98	0.157	0.003	5.36	0.175	48.0
June	0.712	<0.031	1.080	11.7	0.181	0.007	3.92	0.022	41.6
July	0.948	0.104	2.390	8.85	1.66	0.002	7.13	0.041	59.9
August	0.858	<0.031	0.522	5.64	0.110	0.005	5.12	<0.022	41.9
September	0.963	<0.031	0.734	7.07	0.118	<0.002	4.98	0.094	61.9
October	0.978	<0.031	0.513	7.73	<0.013	0.010	4.75	<0.022	42.8
November	1.10	<0.031	1.46	6.07	0.164	0.008	4.81	0.030	42.2
December	NR	NR	NR	NR	NR	NR	NR	NR	NR
Effluent Limits (ug/L)									
6-month median	620	120	250	120	250	4.9	620	67	1,500

NR = Not Required

¹ Goleta Sanitary District NPDES Monitoring Program Annual Report 2017

Table 2. PRIORITY POLLUTANTS BIOSOLIDS 2017, mg/dry Kg²

POLLUTANT	POLLUTANT LIMITS Part 503 Table 3, Sec 503.13	March 2017 Screw Press 3/18/2017	April 2017 Screw Press 4/5/2017	July 2017 Screw Press 7/5/2017	October 2017 Screw Press 10/4/2017
Total Coliform (MPN/g)	NL	4,950,000	NA	NA	>10,300,000
Fecal Coliform (MPN/g)	NL	934,000	NA	NA	10,300,000
Antimony	NL	2.10	NA	NA	<2.4
Arsenic	41	2.41	2.11	<1.5	<1.3
Barium	NL	341	NA	NA	403
Beryllium	NL	< 0.77	NA	NA	<0.90
Cadmium	39	1.14	1.80	2.22	1.60
Chromium	* (1)	30.2	36.2	41.9	33.6
Chromium ⁶⁺	NL	< 10.7	NA	NA	<0.10
Cobalt	NL	4.0	NA	NA	4.96
Copper	1,500	812	852	1,060	879
Lead	300	11.2	14.9	16.3	15.0
Mercury	17	0.762	0.291	0.550	0.0381
Molybdenum ⁽²⁾	75	15.9	17.5	20.3	20.3
Nickel	420	24.7	27.2	29.2	21.6
Phosphorus	NL	19,900	22,500	29,500	20,500
Selenium	100	9.6	10.9	12.6	7.8
Silver	NL	NT	NA	NA	<0.90
Thallium	NL	< 1.8	NA	NA	<2.1
Zinc	2,800	873	939	1,230	959
pH	NL	7.87	NA	NA	7.68
Oil & Grease (%)	NL	NA	NA	NA	1.2
% Moisture	NL	81.8	82.3	86.0	84.4
Nitrate	NL	825	<5.5	<7.0	507
Organic Nitrogen	NL	38,830	0	33,200	35,936
Kjeldahl Nitrogen	NL	41,500	6,170	50,900	36,400
Ammonia	NL	2,670	6,360	17,700	464

NL = No Limit. NA = Not Analyzed.

*(1) On October 25, 1995 the EPA amended Part 503 to delete chromium standards from Tables 1 through 4 of Subpart B, Land Application.
 *(2) The EPA amended Part 503 on February 25, 1994 to delete temporarily the Table 3 molybdenum limits. However, the ceiling limit of 75 mg/Kg from Table 1 has been retained and must be met.

The March 2017 sample was also analyzed for Vanadium with a result of 15.0 mg/Kg. The same sample was analyzed for copper by the STLC method which resulted in an acceptable value of 0.0256 mg/L. The STLC analysis was performed on the April sample for copper and selenium with results of 0.0464 mg/L and 0.0870 mg/L respectively. The STLC analysis for copper and selenium was also required for the July sample with an outcome of 0.00669 mg/L and 0.131 mg/L respectively. Similarly, the October 2017 sample had high copper result that required a STLC analysis resulting in a value of 0.0692 mg/L.³

Priority Pollutants⁴

The NPDES permit requires priority pollutant analyses to be performed on influent and effluent composite samples annually. Compounds detected in the influent and/or effluent samples are presented in Table 2-7; complete copies of all the laboratory reports listing all the chemical compounds and analytical methods are available for review at the Goleta Sanitary District laboratory. Sixteen compounds were detected in the influent and ten in the effluent. Concentrations of detected chemicals are all reported as parts per billion except for TCDD and radioactivity which the units are noted next to the parameter in the table.

Results of influent and effluent radioactivity determinations for 2017 are also presented in Table 2-7. Limits for radioactivity are defined in Title 17 of the California Code of regulations section 30269, which state limitations of 3×10^{-8} $\mu\text{Ci/mL}$ (or 30 pCi/L) for alpha emission and 3×10^{-6} $\mu\text{Ci/mL}$ (or 3000 pCi/L) for beta emission. Samples collected during 2017 were below these limitations.

Table 2-7. Detected Priority Pollutants, Goleta Sanitary District, 2017

Parameter, units	Influent, ug/L	Effluent, ug/L
Acetone	3200	ND
Antimony	1.49	1.23
Bis(2-Ethylhexyl)phthalate	1.47	ND
Bromoform	ND	0.355
Chloroform	9.0	58.7
Dibromochloromethane	0.404	8.51
Dichlorobromomethane	1.19	28.6
Diethylphthalate	1.50	ND
Methylene Chloride	2.09	ND
PAHs	0.06	ND
Phenol	31.2	ND
Phenols	85.3	ND
TCDD, equivalents, pg/L	0.182	0.0192
Selenium	2.68	1.53
Toluene	0.828	0.824
Radioactivity, gross Alpha pCi/L	1.86 ± 1.60	0.00 ± 1.39
Radioactivity, gross Beta pCi/L	24.2 ± 2.99	25.2 ± 2.99
ND = Not Detected		

DISCHARGE COMPLIANCE

Throughout 2017 the wastewater discharge from Goleta Sanitary District complied with all applicable permit effluent limitations. There was one exception on March 21st when the chlorine residual level fell below the required seven-day average level of 5 ppm at the chlorine contact tank with a reportable result of 4.8 ppm. However, the disinfection requirement was in place for primary blended effluent and the effluent bacteria results during that time supported the disinfection level was effective. All other monitored parameters were below their respective limitations as required by the permit. All metals, priority pollutants, and pesticides were low or undetected throughout the year.

b. 2017 UPSET, INTERFERENCE AND PASS THROUGH INCIDENTS

IU NAME AND ADDRESS	TYPE OF INCIDENT	INCIDENT FREQUENCY	EXPLANATION OF INCIDENT	CORRECTIVE ACTION TAKEN	LIMIT CHANGES NECESSARY
None in 2017					

³ Goleta Sanitary District Biosolids Annual Report 2017

⁴ Goleta Sanitary District NPDES Monitoring Program Annual Report 2017

c. 2017 Updated List of SIUs

Class IV – Serious Hazard: Significant Industrial User Permit Classification

GSD issues Class IV permits to industries that are regulated under National Categorical Pretreatment Standards, (aka CIU's), users that have continuous discharge to the sewer which contain toxic pollutants and/or excessive hydraulic loading. 2017 Class IV permits include: **Neal Feay Company, Electromatic, Inc., Innovative Micro Technologies, University of California, Santa Barbara and MMI-Intriplex Technologies**. These industries are inspected four times per year, sampled two times per year during the 1st and 3rd quarters by District staff. As required by 40 CFR 403.12(e), these SIU's submit Self-Monitoring Reports (SMR's) two times per year for the specified 2nd and 4th quarter periods.

The hazardous waste generated on the UCSB campus is monitored by the UCSB Department of Environmental Health and Safety. They are responsible for monitoring facilities within the University boundaries, GSD provides some regulatory oversight, conducting frequent facility inspections, and monitoring the combined UCSB discharge. UCSB is regulated as an SIU based on flow as provided for in 40CFR403.3(v)(ii) and has the same sampling, inspection and self-monitoring schedule as CIU's.

During 2017, as stipulated in the approved pretreatment program, all five permitted SIU's were inspected four times and sampled twice by District staff.

c. 2017 SIU Additions/Deletions/Information

1) On September 19th, during 3rd quarter sampling at Neal Feay Company, (NFC) pH was measured on site at the end-of-process location. Results were: 4.33, 4.34 and 4.33; the local limit for pH is 6-9.5. Verbal warning was given immediately and a written notice of violation was sent via certified mail on September 21st requiring written explanation with action to correct problem due within 10 days, resample for pH upon correction and again within 30 days. NFC staff rechecked on 9/22/17, pH = 6.56, Industrial Waste Control Officer, IWCO, rechecked on 10/23/17, pH = 9.34. NFC was having trouble with the Waste Treatment System, WTS, NFC consultant & staff trying to troubleshoot and repair the existing system.

2) NOV was sent to NFC on 11/2/17 for violating the local limit for exceedance of Lead @ 1.9 mg/L (LL=1.5 mg/L.) During PCI on December 5th, Auditors identified that NFC had actually violated the *federal limit of 0.69 mg/L* since the sample was taken at the end-of-process; IWCO sent *correction* NOV 12/8/2017; resample of lead included with 4th quarter SMR, Pb = 0.192 mg/L however, problems with WTS continue: the system was installed in 2002 by a company no longer in business and the electrical, relays, pumps kept malfunctioning. NFC research options for a new and/or major update to the WTS.

3) During PCI on December 5th, the NFC IU file was reviewed and a site inspection was conducted by Sirese Jacobson, PG Environmental. Results: 1) "no discharge" sign required above hand sink on processing floor; 2) hazardous waste manifest for hauled Nickel waste (which was being captured while the WTS is manually operated and the ion exchange unit disconnected).

4) A compliance schedule was included in the "special conditions" section of NFC's permit # IV-403 sent January 16, 2018 for the 2018-2020 IU discharge years with interim steps to submit plans, order equipment, develop and submit a slug prevention plan relative to the new and/or updated system and have the WTS complete, on-line and operating by April 30, 2018.

Please find all other updated SIU information, including applicable categorical federal standards, in the following [2017 SIU Monitoring and Compliance Status Report](#) table:

d. 2017 SIU Monitoring and Compliance Status Report

Permit Number	Industrial User, Site Address & Applicable Federal Category	Standards Local/Categorical	Pretreatment in Place	Q T R	Inspections /Samples	Compliance Status		Compliance/ Enforcement	Remarks
						Fed	Local		
IV-403	Neal Feay Company 133 La Patera Goleta, CA 93117 Metal Finishing 40 CFR 433.17(a)	YES/YES	Ion exchange & Neutralization	1	1/1	A1	A1	FULL	3 rd Qtr NOW & NOV for pH & Lead exceedance as described above. PCI file review/ site visit 12/5/17. Compliance schedule in 2018 IU permit to fix failing WTS and submit Slug Control Plan by 4/30/2018.
				2	1/1	A2	A2	FULL	
				3	1/3(pH)	B1	D3	NOW/NOV	
				4	2/1	A2	A3	PCI Review	
IV-413	UC, Santa Barbara Environmental Health & Safety Santa Barbara, CA 93106 SIU (based on hydraulic loading)	YES/NO	Grease/Sand separation, G&O interceptors, pH Neutralization	1	1/1	N/A	A1	FULL	The hazardous waste generated on UCSB campus is monitored by the EH&S Department. GSD samples at end-of-pipe, local limits apply. Will evaluate need for CIU permit during 2018 pretreatment program update. Full 2017 Compliance.
				2	1/1	N/A	A2	FULL	
				3	1/1	N/A	A1	FULL	
				4	1/1	N/A	A2	FULL	
IV-414	Electromatic, Inc. 789 S. Kellogg Avenue Goleta, CA 93117 Metal Finishing 40 CFR 433.17(a)	YES/YES	Filtration, Neutralization / pH correction, Metal Precipitation	1	1/1	A1	A1	FULL	Slug Control Plan & TOMP on file, certifications provided 2 nd & 4 th Qtr SMR's. Metal precipitation w/ferrous sulfate drives CUPA/DTSC to require automatic pretreatment w/meters & continuous pH monitoring during 2018. Full 2017 Compliance.
				2	1/1	A2	A2	FULL	
				3	1/1	A1	A1	FULL	
				4	1/1	A2	A2	FULL	
IV-429	Innovative Micro Technology 75 Robin Hill Road Goleta, CA 93117 Metal Finishing 40 CFR 433.17(a) Semiconductor 40 CFR 469.18	YES/YES	Neutralization / pH correction	1	1/1	A1	A1	FULL	Slug Control Plan & approved TOMP on file, certifications provided with 2 nd & 4 th quarter SMR. Remove 433.17(a) in new IU Permit since no metal finishing; all current processes are covered in 40 CFR 469.18. Full 2017 Compliance.
				2	1/1	A2	A2	FULL	
				3	1/1	A1	A1	FULL	
				4	1/1	A2	A2	FULL	
IV-433	MMI Intriplex Technologies 5728 Thornwood Drive Goleta, CA 93117 Metal Finishing 40 CFR 433.17(a)	YES/YES	Neutralization / pH correction, capture and haul all concentrated chemicals and dragout tanks.	1	1/1	A1	A1	FULL	Operations now in Thailand, looking for new client/product for Goleta. Chemical deburr system off-line, tanks are empty. Processing small scale prototypes. Slug Control Plan on file. Full 2017 Compliance.
				2	1/1	A2	A2	FULL	
				3	1/1	A1	A1	FULL	
				4	1/1	A2	A2	FULL	

OTHER NOTES:

LOCAL = Local Limits
 Fed = Federal Categorical Standards
 *ACL = Alternative Categorical Limit
 Applied at end-of-pipe

COMPLIANCE STATUS KEY

A) Consistently Achieving Compliance
 B) Inconsistently Achieving Compliance
 C) Compliance Status Unknown
 D) On a Compliance Schedule (Due Date)

COMPLIANCE DETERMINANTS

1) POTW Sampling Data Only
 2) Self Monitoring Data Only
 3) Both 1 & 2
 4) Other (Described in Remarks)

COMPLIANCE/ENFORCMENT

FULL= Full Compliance
 NOW = Notice of Warning
 NOV = Notice of Violation
 AO = Administrative Order
 CIVIL = Civil Action
 CRIM = Criminal Action
 FINE = Administrative Fines
 REVO = Revocation of Permit

e. Program to Reduce Pollutants from Non-SIU Industrial/Commercial Users

Since the enactment of the Federal Water Pollution Control Act (Public Law 92-500), GSD has maintained a pretreatment program for regulating and monitoring industrial discharges. At the beginning of 2017 there were 36 non-SIU industrial user wastewater discharge permits: 16 Class III, 12 Class II and 8 Class I. During 2017 one non-SIU ceased operations, one changed permit classification and then ownership and three new non-SIU permits were issued. There is a list of these IU's as well as a Summary of Permit Info and/or Classification Changes included in this report. To provide reasonable basis for classification of the various industrial users in the District, there are four additional permit classes for non-SIU's:

Class I - No Hazard

This class includes industrial users who do not handle, store, or dispose of toxic wastes on the premises; and who do not discharge toxic wastes into the sewer. These users include those with discharges that contain non-toxic pollutants, which may cause interference with the operation of the WWTP.

Class II - Low Hazard

This group of industrial users handles or stores toxic wastes on their premises, but does not discharge these wastes to the sewer. Such users have all toxic wastes hauled off site, but have floor drains or other plumbing fixtures through which toxic waste can be conveyed to the sewer during normal wash down operations or spillage. Zero-Discharge Certification Form can be used in lieu of monitoring.

Class III - Hazardous

This classification is for users with intermittent discharges to the sewer which contain toxic pollutants.

Class IIIR – Groundwater Remediation

This classification is for industrial users pumping contaminated groundwater through treatment then discharging to the sewer.

All non-SIU permit holders are inspected and sampled at a minimum of one time per year and are not required to self-monitor unless a violation is discovered during routine sampling and inspections. Groundwater remediation sites also self-monitor and/or report two to four times per year relative to the years of ongoing site cleanup and continued compliance history. Most sites have closed under the "Low-Threat Underground Storage Tank Closure" Policy of the California Water Boards; currently there are two permitted remediation sites, neither is discharging any treated groundwater.

All permitted non-SIU's are currently in compliance, none are on a compliance schedule.

e. Additional Programs

GSD's Collection System Staff & IWCO implement a FOG Source Control Program and are actively monitoring >100 Food Service Establishments, (FSE's). During 2017, outdoor interceptors were sampled 68 times using a "sludge judge", 64 initial tests were <25% and in compliance; 4 were >25% and had to be re-sampled and/or brought back into compliance. Twenty-one (21) FSE's do not have outdoor interceptors, 18 were sampled at their end-of-pipe location; 15 were <100mg/L, 3 >100mg/L. There were 19 closures, new owner and/or remodel of FSE's that were not monitored during 2017.

GSD partners with the Santa Barbara County Green Business Program helping local businesses go beyond regulations to serve as models of sustainable practices. During 2017 an intern was hired to help with door-to-door Industrial Waste Survey, follow-up inspections continue. To comply with 40 CFR 441.50 dental regulations, the information regarding all dental practices in the District is updated, current and ready to send the required *One-time Dental Compliance Certification Reports* in early 2018; applicable inspections will be conducted. Ongoing IU surveys include building plan review, connection permits, local business news, GSD staff drive by and communication with other regulators.

GSD continues the non-industrial source control program consisting of semi-annual sampling of eight manholes, 5 residential areas and the three main trunk lines of the GSD service area. This ongoing analytical data is used to calculate the maximum allowable headwork's loading for local limit justification.

e. 2017 Industrial Users in accordance with the Industrial Waste Control Permit System

<u>CLASSIFICATION</u>	<u>PERMIT #</u>	<u>INDUSTRY NAME</u>
Class I	I-113	Goleta Water District / San Marcos Well
	I-115	Goleta Water District / Berkeley Well
	I-116	Goleta Water District / San Antonio Well
	I-117	Goleta Water District / Shirrell Well
	I-118	Goleta Water District / El Camino Well
	I-122	Goleta Water District / Anita Well
	I-123	Goleta Water District / San Ricardo Well
	AI-120**	Goleta Water District / Airport Well
Class II	AII-204**/**	NSTec Special Technologies Lab
	II-211	Soilmoisture Equipment Corporation
	II-219	Turnpike One Hour Martinizing
	II-224	Advanced Vision Science, Inc.
	II-228	Santa Barbara County Sheriff Coroner's Office
	II-232	Eco-Friendly Cleaners
	II-240	NSTec Special Technologies Lab
	AII-241**	L-3 Maripro, Inc.
	II-242	Santa Barbara News Press
	II-243	Astro Aerospace/Northrup Grumman
	II-244*	Soraa Inc. reclassified to III-369
II-245**	AgRx	
Class III	III-306*	Channel Industries acquired by Piezo Kinetics 6/9/17
	III-324*	Macrodyn-Nadir US Inc. (former Trisep Corporation)
	III-325	Goleta Valley Cottage Hospital
	III-333	MMI Intriplex Technologies
	III-337	Skate One Corporation
	III-344	National Railroad Passenger Corporation
	III-349	Raytheon EW
	III-351R***	Westside Gas (remediation system off)
	III-357R***	Bardex Corporation (remediation system off)
	III-360*	Santa Barbara Airbus (permit re-issued)
	III-361	Oxford Instruments Asylum Research, Inc.
	III-363	CBRITE, Inc.
	III-364	Soraa Laser Diode, Inc.
	III-366	Rayne of Santa Barbara
	III-367	Karl Storz Imaging
	III-368*	Next Energy Technologies Inc. (changed location)
	III-369*	Soraa Inc.(former II-244) Kyocera International, Inc.
III-370*	Santa Barbara Airport (Lav-Dump Facility)	
Class IV	IV-403	Neal Feay Company
	IV-413	University of California at Santa Barbara
	IV-414	Electromatic
	IV-429	Innovative Micro Technologies
	IV-433	MMI Intriplex Technologies

*Change in Permit Info and/or Status, **Santa Barbara Airport properties, ***ZERO or MINIMAL 2017 Discharge

e. 2017 Summary of Non-SIU Permit and/or Classification Changes

INDUSTRIAL USER	2017 PERMIT	2018 PERMIT	COMMENTS
Channel Technologies Group, LLC 839 Ward Drive Santa Barbara, CA 93111	III-306	N/A	During compliance monitoring on 4/11/17 the IWCO discovered that CTG was being auctioned. Follow-up 4/27/17 found Piezo Kinetics, Inc. had acquired CTG; IU permit application received 5/23/17.
Piezo Kinetics, Inc. 839 Ward Drive Santa Barbara, CA 93111	III-306	N/A	Re-issue Permit III-306 on 6/9/17 to Piezo Kinetics as they complete processing of final order, ship raw materials/equipment to their plant in Pennsylvania and have waste mop-water/used oil hauled off-site. Building completely vacated by 6/30/17, permit III-306 rescinded.
City of Santa Barbara-Airport Dept. 601 Firestone Road Santa Barbara, CA 93117	III-370	III-370	Challenges caused by discharge of commercial toilet waste prompted oversight of transportation industry discharging lavatory waste containing chemicals to control odors. Permit # 370 was issued to SBA on 5/4/17. Airlines' lav-dumps are tracked (user, date/time, quantity) and analyzed with plant processes, trends have emerged. Info will be used to educate users on proper mixing and disposal; Pretreatment may be required.
Next Energy Technologies, Inc. 600 Ward Dr. Santa Barbara, CA 93111	III-368	III-368	Permit # 368 issued on 10/5/16 while in small space developing product. More space necessary to develop solar in large sheets of glass. Change to larger location during 2017 from 5385 Hollister Ave. Bldg #6, currently designing workspace. IWCO to evaluate CIU classification during 2018.
Santa Barbara Airbus 750 Technology Drive Goleta, CA 93117	III-360	III-360	Challenges caused by discharge of commercial toilet waste prompted oversight of transportation industry discharging lavatory waste containing chemicals to control odors. Permit # 360 was re-issued 6/29/17. Bus toilet odor control product substitution by SBAB improved challenges at the WWTP.
Soraa, Inc. 75 B Robin Hill Road Goleta, CA 93117	Reclassified from II-244 to III-369	N/A	Lapping process installed prompted permit classification change. New permit issued on 5/24/17. Change of ownership notification email received 9/22/17 from Kyocera International, Inc.; same operations and staff continue.
Kyocera International, Inc. 75 B Robin Hill Road Goleta, CA 93117	N/A	III-369	IU Discharge application received 11/7/2017 with new owner information. Permit III-369 issued on 1/16/2018 for 2018-2020 discharge.
Microdyn-Nadir US Inc. 93 South La Patera Lane Goleta, CA 93117	III-324	III-324	Central Coast RWQCB requires cleanup of 1,4 dioxane contamination @ the MNUS site. An ozone system will be used to treat contaminated water, with plan to re-inject back into ground. Possible sewer discharge during startup.

f. 2017 PRETREATMENT PROGRAM SIGNIFICANT CHANGES

On March 5, 2015 GSD staff submitted an NPDES application to the Central Coast RWQCB, the first since the plant upgrade completion in December 2013 to full secondary effluent. Order No. R3-2017-0021 for NPDES Permit No. CA0048160 was adopted by CCRWQCB on September 21, 2017 and is effective November 10, 2017 through November 9, 2022.

With new discharge limits and monitoring requirements established/adopted, the IWCO is proceeding with a major evaluation and update of the District's pretreatment program's administrative manual to include:

- evaluation of maximum allowable headworks loading to assess need for technical justification of local limit update;
- update of sewer use Ordinance #77 to include: optional streamlining regulations, definitions for SNC for pH monitoring; correction of conflicting/confusing verbiage with O&G numerical limits, consideration of adopting local limits as a separate document/resolution, SNC definition change to, "in a newspaper of general circulation...", typo corrections and any other requirements and/or recommendations arising from the December 5, 2017 PCI conducted by PG Environmental once findings are received;
- Cohesion of ERP, control mechanisms and pretreatment program documents; and
- Evaluation with possible updates of the multi-jurisdictional agreements with City of Santa Barbara and Goleta West Sanitary District.

Project proposals have been requested from four consulting firms experienced with local limits evaluation and pretreatment programs: Larry Walker Associates, RvL Associates, Woodard Curran and Ashworth Leininger Group. Once received and approved, the project will be included in the IWC budget for fiscal year 2018-2019.

An intern was hired in June 2017 to assist the IWCO with a comprehensive door-to-door IU survey.

g. SUMMARY OF 2017 PRETREATMENT PROGRAM BUDGET

Expenditures for the Pretreatment Program consisted of the following:

Office Supplies	850.01
Printing, Publication and Public Education Expenses	6,397.64
Training Seminars & Travel	2,549.34
Operating Expenses	12,508.49
-Uniforms/Boot Allowance (\$497.64)	
-Insurance (\$4412.70)	
-Miscellaneous Equipment/Materials (\$1153.30)	
-Janitorial Services (\$900.61)	
Membership Expense	427.24
Vehicle Maintenance & Fuel	550.28
Utilities	990.88
Outside Laboratory Analysis/Professional Service	7,438.90
<u>Labor (including benefits)</u>	<u>160,706.62</u>
TOTAL	<u>\$192,419.40</u>

The Program is funded by fees derived from Industrial User Permits and Sewer Service Charge Revenues.

h. 2017 SUMMARY OF PUBLIC PARTICIPATION ACTIVITIES

Since the last Pretreatment Report, GSD published one newsletter to inform ratepayers about current happenings including an update regarding our partnership with Goleta Water District to explore expansion of recycled water use in Goleta Valley, detailing the District's new Strategic Plan and Vision Statements which are focused on environmental stewardship, the District's efforts at

energy efficiency, an update about the 2017 winter storm damage to our outfall vault, a reminder to keep fats, oils and grease out of drains, and tips for proper disposal of medications.

GSD hosted 732 visitors for plant tours, and welcomed the local bird watching community, as well as hosting our biennial open house which had 1100 attendees in 2017, a new record! We also made available to the public Class A exceptional biosolids for pickup, when available. Public outreach efforts for 2017 totaled contact with 2329+ members of the public.

GSD manned information booths and played the spinning wheel game with Klean Kanteen giveaways for the local **Earth Day Festival** on April 22 & 23, 2017 in Santa Barbara. For the sixteenth year, the GSD team continued sharing information about wastewater treatment, resource recovery, pretreatment, collections, pollution prevention and 'what to flush' by playing the same informational spinning wheel game at the 26th Annual **California Lemon Festival** held September 16 & 17, 2017 in Goleta. Additional 2017 off-site outreach activities involving GSD staff included hosting a United Way **Fun in the Sun lunch bunch** for 55 students and counselors, and staff presentations to local Boy and Girl Scout troops.

The IWC Officer continues as a member of the Steering Committee for **Green Business Program Santa Barbara County** and is helping District businesses become more aware of resource conservation and sustainability through education about the GBPSBC certification process and benefits. The District continues public outreach efforts in Pollution Prevention by sharing information about BMP's with industries, commercial businesses and restaurants. The District is pursuing Green Business certification in 2018 for its offices.

As required by the General Pretreatment Regulations, the District publishes notices in a newspaper of general circulation informing the public of significant violations during each calendar year. **There were NO industrial users in significant noncompliance during 2017.**

i. 2017 CHANGES IN BIOSOLIDS TREATMENT / DISPOSAL / REUSE⁵

On November 10, 2017, the Goleta Sanitary District's current NPDES permit became effective. The Goleta Sanitary District operates under NPDES Permit No. CA0048160 and Waste Discharge Requirements (WDR) Order No. R3-2017-0021 which replaced the prior Order No. R3-2010-0012 that was effective September of 2010. These permits contain sludge-monitoring programs requiring the District to analyze its sludge for various constituents on either an annual or quarterly basis depending on the constituent. The District's NPDES permit also stipulates that the District's biosolids must meet all of the regulations contained in 40 CFR Part 503.

All biosolids currently being produced and distributed by GSD are released in bulk form as "Pollutant Concentration (PC) Biosolids, Class B", and, as such, they meet 40 CFR Part 503 sections 503.12 and 503.14, General Requirements and Management Practices. During 2017, a total of 1,070 dry metric tons of bulk biosolids were produced by the Goleta Sanitary District.

Biosolids dredged from the stabilization basins and solar dried in the sludge drying beds are tested and given away as "Class A Biosolids of Exceptional Quality". These biosolids are to be used in home lawns and gardens, and as such, they are exempt from the General Requirements and Management Practices of 40 CFR Part 503 Sections 503.12 and 503.14, respectively. Throughout 2017 a total of 14.8 cubic yards (4.5 dry metric tons) of biosolids were distributed to the local community.

Western Express Inc. is currently hauling the District's Class B biosolids to Liberty Composting Inc. located at 12421 Holloway Road, Lost Hills, CA 93249. The administrative office for Western Express Inc., is located at 1533 E. Shields Ave., Suite F, Fresno, CA 93607.

⁵ Goleta Sanitary District Biosolids Annual Report 2017

Goleta Sanitary District Response to the May 23-24, 2016 PCI & Summary Report

The Goleta Sanitary District, (the District), is in receipt of the Summary Report regarding the May 23-24, 2016 Pretreatment Compliance Inspection (PCI) conducted by Christine Wong of Tetra Tech, Inc. As required by the Central Coast Regional Water Quality Control Board's transmittal on November 30, 2017, the following are the District's specific responses to each required and/or recommended action applicable to Goleta Sanitary District's pretreatment program as identified in the PCI Summary Report beginning on page 13, Section 11, ***Summary of Requirements and Recommendations***.

11.1 Requirements:

1. ***"The District is required to review the O&G limits in its SUO, determine how the limits are intended to be applied, and revise the applicable sections accordingly to resolve any confusion or conflict."*** District staff has initiated an update to the pretreatment program to reflect change in treatment and operations, a result of the plant upgrade complete in 2013 and reflected in the 2017 NPDES Permit No. CA0048160. Project proposals have been requested from various companies to provide consulting services which may include the following: 1) Update of Pretreatment Program Administrative Manual; 2) Local Limit evaluation and possible update, 3) SUO update to include (but not limited to) additional streamlining regulations, determination of protective G&O limits to resolve any confusion or conflict as required during this PCI; and 4) Cohesion of ERP, Control Mechanisms and all pretreatment program documents.

A major permit renewal for all District IU's was in process before the District's receipt of these PCI findings (IU discharge permits are valid for three years.) The interim solution, as discussed with auditors during the December 5, 2017 PCI, was for the District to add "Total" in front of the "Oil & Grease" and keep the limit at "100 mg/L". This change was included in all IU Discharge permits to eliminate confusion while updating the SUO, et al.

2. Goleta West Sanitary District will respond to this finding.
3. Goleta West Sanitary District will respond to this finding.
4. Goleta West Sanitary District will respond to this finding.
5. Goleta West Sanitary District will respond to this finding.
6. ***"...The District is required to revise its SIU permits to correct those errors and include appropriate narrative and numeric O&G limits."*** The District updated all IU Discharge permits which now include the word "Total" before "Oil & Grease" as described in #1 above.
7. Goleta West Sanitary District will respond to this finding.
8. Goleta West Sanitary District will respond to this finding.
9. Goleta West Sanitary District will respond to this finding.
10. Goleta West Sanitary District will respond to this finding.
11. Goleta West Sanitary District will respond to this finding.
12. ***"...The District is required to revise its SIU permits to reflect the regulations at 40 CFR 403.12(j) and to include notification requirements for any substantial change in discharge or production."*** As required by the District's NPDES Permit No. CA0048160, an evaluation of wastewater flows from contributing agencies, including UCSB, is ongoing and daily measurements are recorded, compiled and reported annually to Approval Authority. Characteristics of discharge are monitored at the end-of-pipe manhole four-times/year. However, as a result of this finding by Tetra Tech, the language under *Part III - Reporting Requirements* #2 has been changed in all 2018 IU Discharge Permit's to meet 40 CFR 403.12 (j) requirements and match the District's SUO. The IU permits now state: ***"The permittee shall promptly notify the Goleta Sanitary District of any substantial changes to the User's operations or system which might alter the nature, quality, or volume of its wastewater at least ten (10) days before the change as outlined in Ordinance #77 Section 8.5."***

13. ***“...the District is required to revise its SIU permits to include a requirement to control slug discharges.”*** To clarify, pretreatment staff discussed *evaluating* each IU facility to determine the need for a slug discharge plan, currently most SIU’s have submitted a slug control plan. As a result of this PCI finding *all* IU Discharge 2018-2020 Permits issued now include the following section to meet 40 CFR 403.8 (f) (1) (iii) (B) (6) and correlate with the District’s SUO Section 5.3 – Accidental Discharge/Slug Control Plans:

“SLUG DISCHARGE CONTROL REQUIREMENTS

When determined that actions are necessary to control slug discharges, the permittee shall submit and implement a slug discharge control plan. The slug discharge control plan must include, at a minimum, the following:

- a) Description of discharge practices, including non-routine batch discharges**
 - b) Description of stored chemicals**
 - c) Procedures for immediately notifying the Goleta Sanitary District of slug discharges, including any discharge that would violate a prohibition under Part IV, Section A #10 of this permit, with procedures for follow-up, written notification within 5 days.**
 - d) Procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, and measures and equipment for emergency response.”**
14. ***“...The District is required to ensure that compliance monitoring is conducted for all required parameters at least once each year.”*** UCSB is permitted as an SIU and, in addition, is included in the District’s “non-industrial source control” sampling program (historic monitoring data used for MAHL/LL Evaluations) As such, UCSB is usually monitored for conventional pollutants by District staff at least 2 times/year. However monitoring for these conventional pollutants during 2015 only happened during their self-monitoring and not during the District’s independent 1st & 3rd quarter monitoring. This oversight has been corrected.
15. ***“...If the District adopts SNC criteria for pH, it must include the criteria in its ERP.”*** The District will evaluate adoption of SNC criteria for pH during the pretreatment program update as described in #1 above. If approved/adopted, it will also be in the revised ERP after the SUO is updated.

11.2 Recommendations:

- 1. *“If the District updates its legal authorities to incorporate optional NSCIU streamlining rule provisions, it is recommended that the District develop SOPs for implementing the options. The District should have adequate SOPs outlined and available if and when the program implementation options are used.”*** The District intends to update the SUO to include optional NSCIU and other streamlining regulations and will work with the project consultant (as described in #1 above) to consider development of SOPs for each option. The Central Coast RWQCB will be notified at least 45 days before implementing any non-substantial changes; per 40 CFR 403.18, approval will be requested for any substantial program modifications to the District’s pretreatment program.
- 2. *“The District has never evaluated all the operations taking place on the UCSB campus to determine whether any of them require regulation under federal categorical standards. It is recommended that the District evaluate all operations at UCSB to determine whether categorical operations are being performed.”*** Clarification: The District’s latest revised pretreatment program was submitted for approval on July 2, 1993 and approval was received by the RWQCB on April 28, 1994. The background data describes UCSB’s capacity right and also

states, "The hazardous waste generated on the UCSB campus is currently being monitored by the UCSB Department of Environmental Health & Safety. The effluent from individual buildings on campus is monitored by this internal department. GSD provides some regulatory oversight, conducting frequent facility inspections, and monitoring the combined UCSB discharge." Since development of the District's pretreatment program, **inspections have been (and still are) conducted four times per year always rotating campus buildings/departments.** The end-of-pipe is sampled four times per year. UCSB violations since 1994: 1) 4/1/2002 for methylene chloride 10.1 (LL=3.143mg/L) and chloroform 0.89 (LL=0.031mg/L), same sampling event; 2) 9/4/2003 for chloroform 0.0459 (LL=0.031mg/L), 3) email NOW in 2016 for late reporting due to holiday weekend. As a research institution there are no products manufactured or sold from UCSB campus and it has been District staff's interpretation, through numerous PCI's, that procedures as currently approved are adequate and protective of the POTW.

3. Goleta West Sanitary District will respond to this finding.
4. ***"...it is strongly recommended that the District remove from discharger permits specifying actions on its part."*** As recommended, obligatory language has been removed from IU permits issued in 2018 i.e.: "Additionally, the Goleta Sanitary District is required by State and Federal Law to sample and perform its own laboratory analysis of the industrial wastewater discharge of Significant/Categorical Industrial Users at least once annually. The cost of these tests will be charged to University of California, Santa Barbara." Has been replaced with, **"The cost of all analytical testing performed to verify compliance with the conditions of Permit # IV-413 will be charged to University of California, Santa Barbara."**
5. Goleta West Sanitary District will respond to this finding.
6. ***"...it is strongly recommended that the District request that SIUs submitting SMRs containing certification statements submit their reports after the monitoring period ends."*** As recommended, the due date for SIU self-monitoring reports has been extended as not to fall within the certifying period. The permits now read, **"Self-Monitoring Reports: In accordance with Goleta Sanitary District's Ordinance #77, Section 8.4 University of California, Santa Barbara must submit to the General Manager reports indicating the nature and concentration of pollutants in the effluent that are specified in Part IA as well as the measured average and maximum daily flows for the reporting period. The reports are due by July 15 (for the reporting period of January through June) and January 15 (for the reporting period of July through December) via hardcopy submittal."**
7. ***"...It is recommended that the District develop a definition for SNC for pH violations, including when pH is continuously monitored."*** Yes, please see response under Requirements #15 above.

Staff appreciates these meetings with EPA Contractors to gain clarification of EPA regulations/updates and to ensure that the District continues to implement a strong and enforceable pretreatment program.