



# Encina Wastewater Authority Annual Pretreatment Program Report

## Table of Contents

<b>Program Summary.....</b>	<b>2</b>
<b>Summary of Analytical Results.....</b>	<b>3</b>
<b>Upset, Interference or Pass-through Incidents.....</b>	<b>3</b>
<b>Industrial Users.....</b>	<b>3</b>
<b>Baseline Monitoring Report Requirements.....</b>	<b>4</b>
<b>Enforcement Activities.....</b>	<b>5</b>
<b>Pollution Prevention Plans.....</b>	<b>6</b>
<b>Best Management Practices Program.....</b>	<b>6</b>
<b>Significant Changes in Pretreatment Program Operation.....</b>	<b>7</b>
<b>Summary of Annual Pretreatment Budget.....</b>	<b>8</b>
<b>Public Education.....</b>	<b>8</b>
<b>Biosolids Disposal Methods.....</b>	<b>8</b>

**Appendix A – Priority Pollutant Laboratory Data**

**Appendix B – Significant Industrial User Listing**

**Appendix C – Non-Significant Categorical Industrial User Listing**

**Appendix D – Pretreatment Program Budget**

**Appendix E – SNC Publication**

## **Program Summary**

The Encina Wastewater Authority (EWA) operates an approved pretreatment program in North San Diego County. EWA is a joint powers authority consisting of six member agencies: the Cities of Vista, Carlsbad, and Encinitas, as well as the Vallecitos Water District, the Buena Sanitation District, and the Leucadia Wastewater District. The Encina System is comprised of the collection, treatment and disposal facilities of its member agencies including: the Encina Water Pollution Control Facility, the Gafner Water Reclamation Facility, the Meadowlark Water Reclamation Facility, the Carlsbad Water Recycling Facility, and the Encina Ocean Outfall.

The EWA service area encompasses a population of approximately 378,115 and covers a 125 square mile area. This area is predominantly characterized by residential development. At the end of 2020, the combined industrial flow to the EWPCF and MWRP (0.181 MGD) represented only 0.677% of the total average daily influent to both treatment plants (26.73 MGD). It is anticipated that the percentage of industrial flows will remain low due to a shrinking manufacturing sector and steady residential population growth in the service area.

During 2020, there were no incidents of upset or pass-through at EWA attributed to industrial users. All monitoring of the Encina Ocean Outfall and receiving water demonstrated compliance with regulatory standards.

At the end of 2020, EWA had 48 permitted Industrial Users (IUs): 14 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 31 Class III Industrial Users (Non-Significant CIUs, zero-discharge CIUs and other businesses with the potential to impact the Encina System). EWA staff conducted 28 inspections of permitted facilities and collected 61 samples in the CIU/SIU categories. Additional inspections and sampling of Class III IUs were also conducted. Laboratory data confirm that the Best Management Practices (BMP) Program implemented during 1999 and 2000 has been effective overall in reducing the level of pollutants discharged to the Encina System.

EWA maintains a proactive enforcement stance. During 2020, 32 Notices of Violation (NOVs) were issued and \$12,764.45 in fines and enforcement costs were assessed. Six of the twenty-one CIU/SIUs active in the service area during the year were found to be in Significant Non-Compliance (SNC). EWA and the industrial users were able to perform the required monitoring during the calendar year. However, due to complications arising from the COVID-19 pandemic, some of the industries in SNC were due to a single monitoring result. Five of the six industries have implemented corrective actions and demonstrated compliance since the event that put them in SNC. The final industry in SNC for a single monthly average result is evaluating alternative cleaning methodologies to resolve the problem.

Local Limit Studies for the Encina Water Pollution Control Facility (EWPCF) and Meadowlark Water Reclamation Facility (MWRf) were completed in December 2009; final approval was received from the San Diego Regional Water Quality Control Board (RWQCB) on March 14, 2012. EWA's Pretreatment Ordinance was amended to reflect the new technically-based local limits, including other recommended changes. EWA's renewed NPDES permit became effective on November 1, 2018. With the issuance of the permit, EWA retained the services of Larry Walker Associates to perform a local limits evaluation for both the EWPCF and MWRf. Larry Walker Associates submitted final local limit evaluations for the two plants. The evaluation determined that, overall, the existing local limits are adequate and protective of the Encina Wastewater Authority's facilities. The evaluations findings were submitted to the board on August 19, 2020.

### **Summary of Analytical Results**

Data required in this section has been reported electronically to the California RWQCB through the California Integrated Water Quality System (CIWQS). Please refer to the Encina Water Pollution Control Facility and Ocean Outfall 2020 monthly, quarterly, and semiannual self-monitoring reports for Order No. R9-2018-0059, NPDES Permit No. CA0107395. Full priority pollutant scans of the influent and effluent for the EWPCF and MWRf are attached in Appendix A.

### **Upset, Interference or Pass-through Incidents**

There were no incidents of upset, interference or pass-through at EWA, attributed to industrial users.

All regularly scheduled monitoring at the ocean outfall demonstrated that EWA's effluent quality remains consistent and meets or exceeds regulatory standards. Receiving water monitoring during 2020 also met compliance standards.

### **Industrial Users**

At the end of 2020, EWA had 48 permitted IUs: 14 Categorical Industrial Users (CIUs), 3 Non-categorical Significant Industrial Users (SIUs) and 31 Class III Industrial Users (Non-Significant CIUs, zero-discharge CIUs and other businesses with the potential to impact the Encina System). The industrial contribution to EWA from CIUs/SIUs (0.181 MGD) as a percentage of the average daily influent (26.73 MGD) is only 0.677%. It is anticipated that the percentage of industrial flows contributed from CIUs/SIUs will remain low due to a shrinking manufacturing sector and steady residential growth in the service area.

Appendix B contains a list of all SIUs along with: federal category, if applicable; type of pretreatment in place; the number of inspections conducted; the number of samples collected by EWA; the number of samples collected by the IU; the number of limit violations; the IU's compliance status by quarter; whether all Total Toxic Organics (TTO) certifications or monitoring data were submitted; and a summary of any enforcement actions taken. Below is a list of additions, changes of status and deletions that occurred during the year.

#### Additions

- No new industries in 2020

#### Changes of Status

- No change of status in 2020.

#### Deletions

- Douglas Technologies Group – Vista, California – This business, which was subject to 40 CFR Part 433 PSNS, relocated all operations to their new facility in Temecula, CA. Production ceased in December 2019. This deletion was reported in the 2019 report although their Class I permit was inactivated in January 2020.
- McCain Manufacturing, Inc. – Vista, California – This business was subject to 40 CFR Part 433 PSNS and reportedly went out of business due to COVID-19 Pandemic. Production ceased in October 2020; their Class I permit was inactivated in December 2020.

Appendix C contains a list of industries that EWA has designated as Non-Significant Categorical Industrial Users (NSCIUs) based on their limited ability to impact the Encina System (discharge less than 100 gallons per day, never discharge concentrated wastestreams, and have demonstrated compliance with applicable discharge limits.) EWA continues to perform annual inspections of these businesses and each industry must submit semiannual certification statements that they continue to meet the NSCIU criteria.

### **Baseline Monitoring Report Requirements**

One Baseline Monitoring Report was received in 2020. SAFC Carlsbad Inc. was permitted as a BMP research and development facility. The industrial user intends to transition to a Class I discharge permit subject to 40 CFR 439 Pharmaceutical Manufacturing Subpart D PSNS. The Baseline Monitoring Report submitted in December demonstrated the need for additional pretreatment prior to initiating discharge. See Enforcement Activities below for details.

### **Enforcement Activities**

EWA maintains a proactive enforcement stance. During 2020, 32 Notices of Violation (NOVs) were issued and \$12,764.45 in fines and enforcement costs were assessed. Administrative Orders are not an approved element of EWA's Enforcement Response Plan.

Captek Softgel International, Inc. had one violation for a late CSR. A NOV was issued and \$200.00 in fines and fees were assessed. In order to accurately determine compliance with local limits and determine the volume of wastewater discharging through the regulated sample point during compliance monitoring events, a compliance condition to install a discharge meter at SP#1 was issued on August 12, 2020. On January 5, 2021, Captek notified EWA that the flow meter was installed. The meter installation was verified during 2021 first quarter monitoring.

SAFC Carlsbad, Inc. based on information obtained during a site visit conducted on July 7, 2020 plus research and information submitted by the industry, it was determined that SAFC Carlsbad, Inc. was discharging federally regulated wastewater generated from viral vector manufacturing operations including cell culturing and purification plus associated equipment and glassware cleaning and manufacturing area floor mopping to sewer. These operations are subject to regulation under the Pharmaceutical Manufacturing Pretreatment Standards set forth in 40 CFR Part 439.47. Section 3.1 of the Encina Wastewater Authority's (EWA) Pretreatment Ordinance prohibits the discharge of industrial wastewater to the Encina Sewerage System without applying for and obtaining the proper permit. Therefore, on July 22, 2020 a Cease and Desist Letter was issued to SAFC until a class 1 permit is issued. EWA is actively working with the industry to assist them through the permitting process.

**SIUs in SNC.** Six of the twenty-one SIUs active in the service area during the year were found to be in SNC. These industries are discussed below.

Bachem Americas, Inc. had one violation of the local limit for pH and one reporting violation in quarter 1. In December, they had a single monthly average violation for acetone. Three NOV's were issued during the year and \$550.00 in fines and fees were assessed. The Industry was in SNC at the end of the fourth quarter due to the single monthly average violation for acetone. The industry's investigation determined acetone is not used in any of their processes and believes acetone may be produced as a byproduct during the glass washing procedure. Reportedly, when isopropanol and bleach or hydrogen peroxide and sulfuric acid residuals comingle. Although the cleaning procedures utilize all the cleaning agents separately, they believe some trace amounts were not fully captured in the post washing process. The glass washing procedure is part of their established GMP procedure. However, Bachem is currently evaluating alternative methodologies to prevent future violations and will conduct follow up monitoring. If Bachem Americas is unable to achieve consistent compliance with discharge standards, the industry will be required to install additional pretreatment.

Glanbia Nutritionals had a single monthly average violation for methylene chloride in the third quarter and one reporting violation for failure to report the violation. One NOV was issued and \$200.00 was assessed in fines and fees. The industry was in SNC at the end of the third quarter due to the single monthly average violation for methylene chloride. The industry investigated the issue and determined the source of the pollutant was a quality control testing process using methylene chloride. For corrective actions, the industry has posted signs at lab sink indicating no discharge of chemistry and retrained employees on proper waste management procedures. The industry demonstrated compliance in the fourth quarter sampling and additional follow up testing results.

HRE Performance Wheels (HRE) had one violation of the federal daily max and one monthly average limit for copper; one violation of the local limit for O&G; one violation for late/incomplete report. Three NOVs were issued and \$650.00 in fines and fees assessed. HRE was in SNC in the third quarter due to the copper monthly average violation. Industry was unable to identify the exact source of the copper violation, but they suspect the constant recycling of tumbling process wastewater has produced a build-up of copper which is carrying over to the rinse table and discharging to SP #1. To prevent future violations, the tumbling system has been recharged with fresh solution. The O&G violation was attributed to air compressor condensate discharging to SP #1. This unregulated wastestream has since been redirected downstream of SP #1. Fourth quarter monitoring demonstrates the Industry has returned to compliance for all three parameters. Required TTO certifications submitted.

Metal Etch Services had a single monthly average violation for chromium in February. One NOV was issued and \$100.00 was assessed in fines and fees. The industry was in SNC at the end of the second quarter due to the single monthly average violation for chromium. The industry investigated this issue and determined rinse water from etching line was the source of the chromium. The rinse water is discharged to Sample Point #1 without treatment. The industry uses an automated etching machine and under normal operating conditions the rinse water is well within standards. The unit uses baffles and rollers to separate etch and rinse water. A factory servicing of the unit determined the baffles were out of alignment, allowing etch water to mix with rinse water. The unit was properly aligned, and subsequent sampling demonstrated compliance. To avoid future issues annual factory maintenance of the unit is scheduled plus operators inspect the baffles and rollers on a routine basis. The industry demonstrated compliant sampling results in the second, third and fourth quarters.

Natel Engineering Company, Inc. had three parameter violations for lead. One daily maximum violation and two monthly average limits were exceeded. During the third evaluation period, Natel had one daily limit violation and two monthly average violations. Additionally, the industry received two reporting violations for failure to notify. Three NOV's were issued and \$900.00 in fines and fees were assessed. The industry was in SNC for the second and third quarters. The third evaluation period identified chronic SNC based on the two monthly averages. The fourth evaluation period identified one monthly average violation. Initial corrective actions following the first violation included

replacing all PVC piping and screens in their industrial wastewater collection system. Residual lead in their collection system was the suspected source of the pollutant. Compliance was demonstrated following this corrective action. Subsequent violations indicated the need for a more thorough investigation into the source of lead. The facilities sawing operation was identified as a contributor of lead after extensive testing. Several filtration devices were evaluated for particulate lead removal efficiency. A 1-micron bag filter plus a sump pump was installed to treat wastewater from the sawing operation and determined by analytical testing to provide adequate lead removal. Additionally, a solids and particulate filter has been added immediately upstream of Sample Point #1. This pretreatment has brought the lead concentration within acceptable levels. A preventative maintenance schedule has been implemented to prevent future violations. The bag filter is changed bi-weekly and the particulate filter is changed weekly. The industry demonstrated compliance in the fourth quarter and has had three compliant sampling events since the installation of the additional pretreatment.

Select Supplements, Inc. had two improper sampling/analysis procedures and one local limit pollutant violation (BOD). Two NOVs were issued and \$550.00 in fines and fees were assessed. The industry was in SNC at the end of the second quarter due to the single violation for BOD collected in June. Select Supplements, Inc. had the clarifier cleaned on 7/24/2020 and then Darling International pumped the unit on 7/28/2020. Select Supplements resampled on 7/30/2020, but the sample failed the laboratories QA/QC. The clarifier was cleaned and pumped again on 8/21/2020 followed by a resample on 8/25/2020. This sample also failed QA/QC. To prevent future violations, the "Gummy" staff were retrained on performing dry cleaning to remove sugar and starch, plus proper drain protection during cleaning events. An additional resample was collected on 9/10/2020, which produced an acceptable result of (62.7 lbs/day). The industry also had two compliant sample events in the fourth quarter.

## **Pollution Prevention Plans**

No industries have submitted or been required to submit a pollution prevention plan.

## **Best Management Practices Program**

In addition to the regulation of SIUs, EWA has attempted to reduce the level of pollutants entering the system through the implementation of a BMP Program. The program began in 1999 with staff development of a wide variety of BMPs for non-significant industrial users. A preliminary file review was performed on each user to determine eligibility to participate in the program. This was followed by an inspection, sampling event and interview to identify applicable pollution prevention strategies.

Users who demonstrated a willingness to participate in the program agreed to implement a variety of actions directed at reducing the level of pollutants in their

discharge. Follow-up sampling and inspections are used to verify program effectiveness.

EWA influent data indicates that the BMP Program has been effective in reducing the level of pollutants discharged to the sewer system. Implementation of the program resulted in a reduction in the number of Class III Permits from 304 at the beginning of 1999 to 35 at the end of 2000. Few changes to user classifications have occurred in recent years; however, new non-significant industrial users are encouraged to participate in the program. EWA currently has 538 businesses in the BMP program.

### **Significant Changes in Pretreatment Program Operation**

On March 14, 2012, the San Diego Regional Water Quality Control Board (RWQCB) adopted an amendment to Order No. R9-2011-0019 incorporating new technically-based local limits into EWA's National Pollution Discharge Elimination System permit. Significant changes include: the addition of local limits for arsenic, mercury, molybdenum, and selenium; relaxed local limits for cadmium, copper, lead, nickel, zinc, and pH; and for industries located in the Meadowlark Water Reclamation Facility service area, additional local limits for boron, iron, and manganese, plus more stringent local limits for biochemical oxygen demand and total suspended solids.

Furthermore, to help improve industrial user compliance rates, EWA has: increased the minimum self-monitoring frequency for SIUs from semiannually to quarterly; and revised the sample type from grab to composite for certain constituents (e.g., oil and grease, cyanide, and organics) where applicable. To incorporate these changes, EWA rescinded and reissued all Class I/II SIU permits. This was completed by July 2012. EWA completed the process of rescinding and reissuing all Class III permits in 2013.

### **Sewage Transfer Agreement Between the City of Oceanside and City of Vista**

The City of Vista maintains an agreement with the City of Oceanside to provide a connection to the City of Vista collection system for wastewater disposal. During calendar year 2020, the City of Oceanside discharged an average of 1.3 MGD to the City of Vista collection system. The wastewater is then conveyed to the Encina Water Pollution Control Facility for treatment and discharge to the Pacific Ocean. The agreement requires the City of Oceanside to administer EWA's local limits and pretreatment ordinance and allows for a maximum average daily flow of 2.15 MGD.

The area contributing wastewater to the City of Vista is characterized as mainly residential with light commercial. The City of Oceanside reports that there were no additional Significant Industrial Users active in the service area contributing to the City of Vista for the remainder of CY 2020.

### **Summary of Annual Pretreatment Budget**



In FY 2021, EWA's Pretreatment Program budget is recommended to be \$966,507. (The amount budgeted may vary slightly from actual expenditures.) This reflects approximately a 4% increase from the amount budgeted during FY 2020. This can be attributed to increased personnel costs. A line item detail of the budget is attached for reference in Appendix D.

## **Public Education**

The EWPCF has been designed to maximize the use of alternative and renewable resources, including methane gas and biosolids, plus generate effluent for recycled wastewater operations. In 2020, EWA continued multiple plant enhancement and rehabilitation projects, which includes Digester Improvements and Rehabilitation, Primary Area Improvements and Rehabilitation, Cogeneration Building Structural Repair, and Network Improvements. Due to the ongoing construction projects, EWA temporarily halted public tours starting in September 2019. Tours will reinstate upon completion of the various projects.

EWA also generally participates in other community outreach activities. In 2020, EWA staff built a new wastewater treatment plant demonstration model and purchased new Public Outreach gifts to promote sustainability and environmental awareness while representing EWA at participating member agency events. Unfortunately, due to the COVID-19 Pandemic, EWA was not able to participate at the City of Carlsbad's Citizen's Academy, Public Works Fairs (spring and fall), World Water Day at the Agua Hedionda Discovery Center, or the Alta Vista Gardens Earth Day. However, EWA staff continuously provided information via phone and e-mails to private citizens and inquiring parties. In addition, copies of the brochure entitled "10 Simple Things You Can Do to Protect the Ocean" were provided to various organizations and private citizens as requested, plus EWA publishes several newsletters a year and maintains multiple social media outlets and the EWA homepage.

40 CFR Part 403.8(f)(2)(viii) requires at least annual public notification, in the largest daily newspaper in the POTW's service area, of industrial users, which at any time during the previous twelve months, were found in significant non-compliance. Attached in Appendix E is a copy of the SNC publication for the period of January 1 to December 31, 2020.

## **Biosolids Disposal Methods**

In 2020, EWA produced approximately 6,311.57 Dry Metric Tons (DMT) of Class A and Class B biosolids. Most of this material (5,631.3 DMT) was transported by Denali Water Solutions to farms in Yuma and Somerton, Arizona for land application. Approximately (28.45 DMT) was sent to Landfill and the remaining (651.82 DMT) was sold/and or given away for use in the following applications: golf courses, nurseries, High School FFA Organizations, soil blenders and fertilizer products.

Laboratory data demonstrates that metal levels in the biosolids are well below the allowable pollutant concentrations for land application as found in Table 3 of 40 CFR Part 503.13. The ability to consistently meet these standards is largely due to EWA's small industrial base and effective Pretreatment Program.

## **Appendix A**

### **Priority Pollutant Laboratory Data**

## **Appendix B**

### **Significant Industrial User Listing**

Encina Wastewater Authority		Reporting Quarters	Number of Inspections	Agency Monitoring	Self-Monitoring	Limit Violations	Reporting Quarter Status	Flow Rate (GPD)
<b>BACHEM AMERICAS, INC</b>		1		1	*3	1	NC	
1271 Avenida Chelsea		2		2	1		C	
Vista, CA 92081		3			2		C	
40 CFR Part 439, Subpart C PSNS		4	1	2	2	1	SNC	
Pretreatment: settling, pH neutralization, hauling								2,100
One pollutant violation for the local limit for local pH limit. One violation pollutant of the federal monthly average limit for Acetone. NOVs issued and \$500.00 in fines and fees assessed. See Enforcement Activities section of the Annual Pretreatment Report for additional details. *1/7/20 IU Monitoring was late submittal from Q4 2019.								
<b>CARTEK (formerly J&amp;D)</b>		1		1	1		C	
2710 Progress Street		2			1		C	
Vista, CA 92081		3		1	1	*	NC	
40 CFR Part 439, Subpart D PSNS		4	1	1	3		C	
PT: pH neutralization, settling/clarifier, oil skimmer								12,100
One violation for a late CSR. One NOV was issued and \$200.00 in fines and fees were assessed. A compliance condition to install a discharge meter at SP#1 was issued on August 12, 2020. On January 5, 2021, Captek notified EWA that the flow meter was installed. *Please note, the 3rd quarter violation was not a limit violation and therefore not listed on this table. The Compliance description is included in the Enforcement Activities section of the Annual Report.								
<b>CARLSBAD TECHNOLOGY, INC.</b>		1		2	2		C	
5923 Balfour Court		2		2	2		C	
Carlsbad, CA 92008		3		2	2		C	
40 CFR Part 439, Subpart D PSNS		4	1	2	2		C	
Pretreatment: pH neutralization								700
<b>CINTAS CORPORATION</b>		1			1		C	
460 West California Avenue		2			1		C	
Vista, CA 92084		3		1	1	1	NC	
Industrial Laundry - Local Limits		4	1	2	1		C	
Pretreatment: settling, dissolved air flotation								60,000
One violation of the local O/G limit. One NOV was issued and \$100 in fines and fees were assessed. Scott Kennedy, Maintenance Supervisor, reports that their investigation determined that their pretreatment system was not responding to inputs for total GPM flow adjustments. After trouble shooting the system, Cintas identified the problem in their PLC control system. The parts were ordered to repair the PLC control unit and the problem has been resolved. The industry demonstrated compliance in the forth quarter monitoring results.								
<b>GLANBIA NUTRITIONALS</b>		1		1	1		C	
2840 Loker Avenue East, Suite #101		2			2		C	
Carlsbad, CA 92010		3			2	1	SNC	
40 CFR Part 439, Subpart D PSNS		4	1	1	1		C	
Pretreatment: pH neutralization, settling/clarifier								220
One violation of the federal monthly average limit for Methylene Chloride. One NOV was issued and \$200.00 in fines and fees assessed. The industry investigated the issue and determined the source of the pollutant was a quality control testing process using methylene chloride. For corrective actions, the industry has posted signs at lab sink indicating no discharge of chemistry and retrained employees on proper waste management procedures. The industry demonstrated compliance in the fourth quarter sampling and additional follow up testing results. See Enforcement Activities section of the Annual Pretreatment Report for additional details.								

<b>HOLLANDIA DAIRY, INC.</b>	1			1		C		
622 East Mission Road	2	1		1	1	NC		
San Marcos, CA 92069	3		1	1	1	NC		
Dairy & Creamery - Local Limits	4		1	1		C		
PT: flow equalization, pH neutralization, MBBRs, DAF								38,000
<p>One NOV was issued for a reporting violation regarding a late data submittal; one NOV was issued for discharging a prohibited substance (screening sludge); one NOV was issued for failing to report an accidental discharge. Three NOV's issued for a total of \$7,114.45. On April 9, 2020 Vallecitos Water District (VWD) determined the Mulberry Drive sewer main was surcharged by a discharge from Hollandia. Following that event EWA and a VWD staff member performed a site visit of the Hollandia facility confirming the discharge of screening sludge to the sewer. During the May 12, 2020 Compliance Inspection, in an effort to save time, Hollandia Dairy staff discharged screening sludge (the thick mat layer that forms in the prescreen collection tank) downstream of Sample Point #1. This point of discharge flows through the facilities private lateral to the sewer main in Mulberry Drive (Manhole #2267). This wastestream was previously either pumped and hauled with the facilities pretreatment sludge or manually removed from the prescreen collection tank and hauled as a solid waste. Hollandia Dairy has implemented engineering improvements and retrained staff. The new pumping system which allows wastes generated from daily cleaning of the prescreen collection tank to be directly discharged and treated through the facilities pretreatment system. The industry demonstrated compliance in the forth quarter monitoring results.</p>								
<b>HIRE PERFORMANCE WHEELS</b>	1		1	1	1	NC		
2611 Commerce Way, Suite D	2	2		1	1	NC		
Vista, CA 92081	3		3	1	2	SNC		
40 CFR Part 433 PSNS	4	1	1	2	*	NC		
Pretreatment: hauling, recycling								100
<p>One violation of the federal daily max and one monthly average limit for copper; one violation of the local limit for O&amp;G; one violation for late/incomplete report. Three NOV's issued and \$650.00 in fines and fees assessed. Industry notes they unable to identify the exact source of the copper violation, but they suspect the constant recycling of tumbling process wastewater has produced a build-up of copper which is carrying over to the rinse table and discharging to SP #1. To prevent future violations, the tumbling system has been recharged with fresh solution. The O&amp;G violation was attributed to air compressor condensate discharging to SP #1. This unregulated wastestream has since been redirected downstream of SP #1. Fourth quarter monitoring demonstrates the Industry has returned to compliance for all three parameters. Required TTO certifications submitted. *Please note, the 4rd quarter violation was not a limit violation and therefore not listed on this table. See Enforcement Activities section of the Annual Pretreatment Report for additional details.</p>								
<b>HUGHES CIRCUITS, INC.</b>	1		1	2		C		
540 South Pacific Street	2			2		C		
San Marcos, CA 92078	3		1	2		C		
40 CFR Part 433 PSNS	4	1	2	2		C		
Pretreatment: pH adjustment, precipitation & settling								12,500
Required TTO certifications submitted.								
<b>IONIS PHARMACEUTICALS</b>	1					C		
2282 Faraday Avenue	2					C		
Carlsbad, CA 92008	3					C		
40 CFR Part 439, Subpart C PSNS	4	1				C		
Pretreatment: hauling								0
No discharge of federally regulated waste during the 2020 calendar year.								
<b>McCain MANUFACTURING, INC.</b>	1		1	1		C		
2633 Progress Street	2			1		C		
Vista, CA 92081	3							
40 CFR Part 433 PSNS	4	1						
Pretreatment: settling/clarifier, OWS, pH neutralization								150
Regulated operations at this facility ceased on 8/22/2021 and verified by inspection 10/27/20. The permit was rescinded on 12/30/20. Required TTO certifications submitted.								
<b>METAL ETCH SERVICES</b>	1		1	1	1	SNC		
1165 Linda Vista Drive, Suite #106	2			1		C		
San Marcos, CA 92078	3		2	1		C		
40 CFR Part 433 PSNS	4	1	2	1		C		
Pretreatment: pH neutralization, hauling								360
<p>One violation of the federal monthly average limit for Chrome. One Nov issued for \$100.00 in fines and fees. The industry investigated this issue and determined rinse water from etching line was the source of the chromium. The rinse water is discharged to Sample Point #1 without treatment. Corrective actions were performed, and the industry demonstrated compliant sampling results in the second, third and fourth quarters. See Enforcement Activities section of the Annual Pretreatment Report for additional details. Required TTO certifications submitted.</p>								

NATEL ENGINEERING COMPANY, INC. 6350 Palomar Oaks Court Carlsbad, CA 92011 40 CFR Part 433 PSNS	1		1	1		C	2,400	
	2			2	1	SNC		
	3		1	2	2	SNC		
	4	1	1	2		C		
Pretreatment: hauling								
One violation of the federal daily max and 2 monthly average limits for lead. Three NOVs were issued and \$900.00 in fines and fees assessed. Corrective actions were implemented and the industry demonstrated compliance in the fourth quarter and has had three compliant sampling events since the installation of the additional pretreatment. See Enforcement Activities section of the Annual Pretreatment Report for additional details. Required TTO certifications submitted.								
NATURAL ALTERNATIVES INTERNATIONAL 1215 Park Center Drive Vista, CA 92081 40 CFR Part 439, Subpart D PSNS	1			4		C	1,310	
	2	1	1	2		C		
	3			2		C		
	4		4	2		C		
Pretreatment: settling/clarifier								
No violations occurred in 2020. One NOV was issued on 2/14/2020 for \$100.00 for 2019 3rd quarter samples collected outside the monitoring period.								
PRIMARCH MANUFACTURING, INC. 1211 Liberty Way, Suite A Vista, CA 92083 40 CFR Part 439, Subpart D PSNS	1		1	2		C	800	
	2		1	1		C		
	3			3	1	NC		
	4	1	1	2		C		
Pretreatment: settling/clarifier, oil & grease removal								
One violation of federal monthly average for Acetone and one reporting violation for failure to submit the lab report within 5 days. One NOV was issued and \$200 was in fines and fees assessed. Primarch attributes the monthly average violation due to scaled back clarifier maintenance. To prevent future violations, Primarch reinstated quarterly clarifier maintenance and Chris notes that this change is permanent; they will not reduce the frequency in the future. IUs resample within discharge standards The industry demonstrated compliance in the forth quarter monitoring results.								
PRUDENTIAL OVERALL SUPPLY 2485 Ash Street Vista, CA 92081 Industrial Laundry - Local Limits PT: flow equalization, pH neutralization, settling, DAF	1			1		C	44,000	
	2			1		C		
	3		1			C		
	4	1	2	2	1	NC		
One violation for monitoring outside the period. One NOV was issued but no fines or fees were assessed because, the IU stated the sampling was delayed due to the laboratories back log resulting from the Panademic. The IU performed two monitoring events in the fourth quarter and the results were compliant.								
SEASPIRE, INC. 5770 Armada Drive Carlsbad, CA 92008 40 CFR Part 433 PSNS	1			1		C	250	
	2			1		C		
	3	1	1	2		C		
	4		2	1		C		
Pretreatment: hauling								
Required TTO certifications submitted.								
SELECT SUPPLEMENTS, INC. 2390 Oak Ridge Way Vista, CA 92081 40 CFR Part 439, Subpart D PSNS	1		1	1		NC	3,000	
	2		1	1	1	SNC		
	3	1	1	3		C		
	4	1	1	1		C		
Pretreatment: settling/clarifier								
Select Supplements had two improper sampling/analysis procedures (O/G) and one local limit local limit pollutant (BOD). Two NOVs were issued and \$550.00 in fines and fees were assessed. Industry reports they were unable to identify a cause for the BOD violation. In response, industry cleaned their clarifier and subsequent monitoring has demonstrated compliance. See Enforcement Activities section of the Annual Pretreatment Report for additional details.								
VERSUM MATERIALS US, LLC 1969 Palomar Oaks Way Carlsbad, CA 92011 40 CFR Part 433 PSNS	1			1			3,000	
	2			1				
	3		1	1				
	4		1	1				
Pretreatment: pH neutralization								

## **Appendix C**

### **Non-Significant Categorical Industrial User Listing**



## **Non-Significant Categorical Industrial Users (NSCIUs)**

Anything Liquid Manufacturing, Inc.  
2080 Las Palmas Drive, Suite 103  
Carlsbad, CA 92011  
Category – 40 CFR Part 439

Gematria Products, Inc.  
2260 Rutherford Road, Suite 101  
Carlsbad, CA 92008  
Category – 40 CFR Part 439

Piercan USA, Inc.  
180 Bosstick Boulevard  
San Marcos, CA 92069  
Category – 40 CFR Part 428

Sabre Sciences  
2233 Faraday, Suite K  
Carlsbad, CA 92008  
Category – 40 CFR Part 439

Seven Manufacturing  
1420 Decision Street, Suite C  
Vista, CA 92081  
Category – 40 CFR Part 439

The GHT Companies  
2465 Ash Street  
Vista, CA 92081  
Category – 40 CFR Part 439

**Appendix D**  
**Pretreatment Program Budget**

## OPERATING EXPENSE SUMMARY: SOURCE CONTROL

<b>PERSONNEL</b>		Actual FY2019	Budget FY2020	Projected FY2020	Recommended FY2021	%
						Change
5100	Salaries	\$ 420,188	\$ 474,304	\$ 455,200	\$ 494,861	4%
5200	Benefits	\$ 172,255	\$ 233,718	\$ 227,400	\$ 243,438	4%
<b>Total Personnel Expenses</b>		<b>\$ 592,443</b>	<b>\$ 708,022</b>	<b>\$ 682,600</b>	<b>\$ 738,299</b>	<b>4%</b>

<b>NON-PERSONNEL</b>		Actual FY2019	Budget FY2020	Projected FY2020	Recommended FY2021	%
						Change
40001	5520 Books	\$ -	\$ 300	\$ 300	\$ 300	0%
40001	5930 Equipment Replacement	\$ 1,747	\$ 1,900	\$ 700	\$ 700	-63%
40001	6120 Fuel & Lube	\$ 1,386	\$ 2,100	\$ 2,100	\$ 2,300	10%
40001	6310 Lab Equipment Repair	\$ 4,658	\$ 10,100	\$ 6,100	\$ 6,200	-39%
40001	6330 Lab Supplies	\$ 109	\$ 750	\$ 750	\$ 750	0%
40001	6410 Laundry & Uniforms	\$ 1,561	\$ 1,850	\$ 2,000	\$ 2,000	8%
40001	6422 Legal Notices	\$ 322	\$ 1,500	\$ 750	\$ 750	-50%
40001	6450 Professional Services	\$ -	\$ 30,000	\$ 28,500	\$ 15,000	-50%
40001	7120 Printing & Reproduction	\$ -	\$ 500	\$ 500	\$ 500	0%
40001	7130 Public Information	\$ 1,811	\$ 3,000	\$ 1,500	\$ 2,000	-33%
<b>Total Non-Personnel Expenses</b>		<b>\$ 11,593</b>	<b>\$ 52,000</b>	<b>\$ 43,200</b>	<b>\$ 30,500</b>	<b>-41%</b>

<b>INTERNAL SERVICE FUNDS</b>		Actual FY2019	Budget FY2020	Projected FY2020	Recommended FY2021	%
						Change
11001	Administration	\$ 93,646	\$ 113,076	\$ 106,472	\$ 115,617	2%
12001	Laboratory	\$ 71,110	\$ 55,194	\$ 75,246	\$ 79,810	45%
13001	Energy Management	\$ 2,050	\$ 2,180	\$ 2,319	\$ 2,281	5%
<b>Total Internal Service Fund Expenses</b>		<b>\$ 166,806</b>	<b>\$ 170,450</b>	<b>\$ 184,037</b>	<b>\$ 197,708</b>	<b>16%</b>
<b>Total Operating Expenses</b>		<b>\$ 770,842</b>	<b>\$ 930,472</b>	<b>\$ 909,837</b>	<b>\$ 966,507</b>	<b>4%</b>

PERSONNEL EXPENSE SUMMARY *by* ACCOUNT

Salaries					
	2020 Budget	% of Total	2021 Budget	% of Total	% Change
Regular	\$ 7,748,544		\$ 8,006,451		3.3%
Overtime	\$ 130,000		\$ 170,000		30.8%
Holiday	\$ 95,000		\$ 99,000		4.2%
Temporary & Part-Time Staff	\$ 175,000		\$ 188,000		7.4%
Intern Program	\$ 29,800		\$ 29,800		0.0%
Shift Differential	\$ 39,000		\$ 39,000		0.0%
Incentive Awards	\$ 14,000		\$ 14,500		3.6%
Standby	\$ 2,000		\$ 5,000		150.0%
<b>Subtotal Salaries</b>	<b>\$ 8,233,344</b>	<b>68.4%</b>	<b>\$ 8,551,751</b>	<b>68.3%</b>	<b>3.9%</b>
Benefits					
	2020 Budget	% of Total	2021 Budget	% of Total	% Change
CalPERS Retirement Program -- Normal Cost	\$ 1,554,716		\$ 1,685,885		8.4%
CalPERS Retirement Unfunded Liability	\$ 870,900		\$ 870,900		0.0%
CalPERS Employee Contribution	\$ (611,946)		\$ (651,556)		6.5%
Other Post-Employment Benefits	\$ 87,061		\$ 51,000		-41.4%
Flexible Benefits 125 Plan	\$ 1,234,645		\$ 1,278,772		3.6%
Deferred Compensation	\$ 293,142		\$ 303,085		3.4%
Medicare	\$ 125,116		\$ 130,195		4.1%
Workers Compensation Insurance	\$ 201,000		\$ 251,000		24.9%
Other Ancillary Benefits	\$ 47,100		\$ 55,000		16.8%
<b>Subtotal Benefits</b>	<b>\$ 3,801,734</b>	<b>31.6%</b>	<b>\$ 3,974,281</b>	<b>31.7%</b>	<b>4.5%</b>
<b>Total Personnel Expense</b>	<b>\$ 12,035,079</b>	<b>100.0%</b>	<b>\$ 12,526,032</b>	<b>100.0%</b>	<b>4.1%</b>

PERSONNEL EXPENSE SUMMARY *by* PROGRAM

Programs					
	2020 Budget	2020 Positions	2021 Budget	2021 Positions	% Change
Encina Water Pollution Control Facility	\$ 4,800,204	32.52	\$ 4,875,074	31.47	1.6%
Source Control	\$ 708,022	4.35	\$ 738,299	4.35	4.3%
<i>Agua Hedionda Pump Station</i>	\$ 279,345	1.71	\$ 513,125	3.00	83.7%
<i>Buena Vista Pump Station</i>	\$ 206,566	1.24	\$ 214,790	1.24	4.0%
<i>Buena Creek Pump Station</i>	\$ 190,259	1.12	\$ 197,408	1.12	3.8%
<i>Carlsbad Water Reclamation Facilities</i>	\$ 562,215	3.38	\$ 584,485	3.38	4.0%
<i>Raceway Basin Pump Station</i>	\$ 154,951	0.93	\$ 161,087	0.93	4.0%
Remote Facilities	\$ 1,393,336	8.38	\$ 1,670,895	9.67	19.9%
<b>Subtotal</b>	<b>\$ 6,901,562</b>	<b>45.25</b>	<b>\$ 7,284,268</b>	<b>45.49</b>	<b>5.5%</b>
Internal Service Funds	\$ 2,468,421	12.54	\$ 2,426,441	12.30	-1.7%
<b>Subtotal Operating</b>	<b>\$ 9,369,983</b>	<b>57.79</b>	<b>\$ 9,710,709</b>	<b>57.79</b>	<b>3.6%</b>
Capital Program	\$ 2,665,096	13.21	\$ 2,815,323	13.21	5.6%
<b>Total Personnel Expense</b>	<b>\$ 12,035,079</b>	<b>71.00</b>	<b>\$ 12,526,032</b>	<b>71.00</b>	<b>4.1%</b>

**Appendix E**  
**SNC Publication**

# PUBLIC NOTICE

## INDUSTRIAL USERS IN SIGNIFICANT NON-COMPLIANCE WITH SEWER DISCHARGE REQUIREMENTS

For the period from January 1, 2020 through December 31, 2020, the following INDUSTRIAL USERS, located in the Encina Wastewater Authority service area, were found to be in Significant Non-Compliance for exceeding applicable discharge limits or failing to meet reporting requirements, based on statistical criteria established by EPA and set forth at 40 CFR Part 403.8(f)(2)(viii). For further information please contact Doug Campbell, Encina Wastewater Authority Director of Environmental Compliance at (760) 438-3941, extension 3600.

<b>Industry</b>	<b>Address</b>	<b>Pollutant/Other</b>
Bachem Americas, Inc.	1271 Avenida Chelsea Vista, CA 92081	Acetone
Glanbia Nutritionals	2840 Loker Avenue East, #101 Carlsbad, CA 92010	Methylene Chloride
HRE Performance Wheels	2611 Commerce Way, Suite D Vista, CA 92081	Copper
Metal Etch Services	1165 Linda Vista Drive, Suite #106 San Marcos, CA 92078	Chromium
Natel Engineering Company, Inc.	6350 Palomar Oaks Court Carlsbad, CA 92011	Lead
Select Supplements, Inc.	2390 Oak Ridge Way Vista, CA 92081	Biochemical Oxygen Demand