

2018

FIRST SEMI-ANNUAL INDUSTRIAL USER PRETREATMENT COMPLIANCE REPORT

Tributary Agencies

Cities of:
**San José,
Santa Clara
And Milpitas**

**Cupertino
Sanitation District**

**West Valley Sanitation
District
(Campbell, Los Gatos, Monte
Sereno and Saratoga)**

**County Sanitation
Districts 2-3**

**Burbank
Sanitary District**

**SAN JOSE-SANTA CLARA
REGIONAL WASTEWATER
FACILITY**

**Administered by the
Environmental Services
Department
City of San José**



Environmental Services Department

San José-Santa Clara Regional Wastewater Facility

WATERSHED PROTECTION

July 31, 2018

CONTRIBUTING AGENCIES

Mr. Bruce Wolfe
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

CITY OF SAN JOSÉ
CITY OF SANTA CLARA
COUNTY SANITATION DIST. NO. 2 - 3
BURBANK SANITARY DISTRICT
CUPERTINO SANITARY DISTRICT
CITY OF CUPERTINO
CITY OF MILPITAS
WEST VALLEY SANITATION DISTRICT
CITIES OF CAMPBELL, LOS GATOS
MONTE SERENO AND SARATOGA

**SUBJECT: San José-Santa Clara Regional Wastewater Facility
2018 First Semi-Annual Industrial User Pretreatment Compliance Report
NPDES Permit No. CA-0037842**

Dear Mr. Wolfe:

Enclosed is the San José-Santa Clara Regional Wastewater Facility (Wastewater Facility) 2018 First Semi-Annual Industrial User Pretreatment Compliance Report, which includes laboratory data on influent, effluent, and sludge monitoring results; compliance tables; and an update on the 2016 Pretreatment Compliance Inspection.

The City of San José (City) faces the challenge of preserving a portion of one of the most important estuaries in the United States, located directly adjacent to a complex urban community. As the lead agency of a regional joint powers authority, the City operates the San José-Santa Clara Regional Wastewater Facility (legally and officially named the San Jose/Santa Clara Water Pollution Control Plant) and provides wastewater treatment to more than 1.4 million residents and 17,000 businesses, including many of the leading computer, solar, and electronics manufacturing companies that make up “Silicon Valley.”

The 2018 First Semi-Annual Industrial User Pretreatment Compliance Report is submitted in accordance with Provision C. 4 of the Regional Board Order No. R2-2014-0034. Contained in the First Semi-Annual Report is a listing of all Significant Industrial Users (SIUs) that had any violation of federal or local standards during the first and second quarters of 2018. The parameters violated, comments on corrective measures, and enforcement actions taken on these SIUs are given in this report. The definitions used to determine significant non-compliance are contained in the 2017 Annual Pretreatment Compliance Report. These definitions are consistent with those found in 40 CFR 403.8(f)(2)(viii)(A-H) and are designated as Significant Non-compliance Federal and Significant Non-compliance Local.

At the end of the second quarter of 2018, the Wastewater Facility was monitoring 217 industries, of which 133 were Significant Industrial Users, and 84 were Non-Categorical Industries discharging under 25,000 gallons per day. Of the 133 Significant Industrial Users, 100 were discharging Categorical Industrial Users, one was a Non-Significant Categorical Industrial User, 18 were Zero Discharging Categorical Industrial Users, three were Zero Discharging Categorical Industrial Users with a non-categorical process discharging under 25,000 gallons per day, one was a Zero Discharging Categorical Industrial User with non-categorical process discharging over 25,000 gallons per day, and the remaining 10 were classified by the quantity of their discharge. The total number varies throughout the year as companies close or additional dischargers are identified. Table 1 is a summary of the compliance performance for all Significant Industrial Users.

Table 1: Compliance Performance of Significant Industrial Users in the Wastewater Facility Tributary Area

Category	1st Quarter 2018		2nd Quarter 2018	
	Federal	Local	Federal	Local
Consistent compliance	93.4%	86.8%	97.8%	91.1%
Inconsistent compliance	6.6 %	13.2%	2.2%	8.9%
Significant Non-compliance	0.0%	0.0%	0.0%	0.0%

We continue to monitor all industrial dischargers and permitted commercial sources to ensure that all violations are identified and corrected as soon as possible. Appropriate enforcement actions are taken if violations persist, and additional compliance measures are pursued with all significant violators.

We look forward to working with you on the continuing process of adapting our programs based on new information and new opportunities. If you have any questions about this report, please contact Casey Fitzgerald, Pretreatment Program Manager, at (408) 793-5378.

Sincerely,



SHARON NEWTON
Acting Deputy Director, Environmental Services, Watershed Protection

Attachments

cc: Ameila Whitson, USEPA Region 9 (via email)
Russell Norman, SWRCB (via CIWQS)
Michael Chee, RWQCB (via CIWQS)

**SAN JOSE-SANTA CLARA REGIONAL WASTEWATER FACILITY
2018 FIRST SEMIANNUAL INDUSTRIAL USER VIOLATION REPORT**

COVER SHEET

NPDES Permit Holder or Sewer Authority Name	<u>The Cities of San José and Santa Clara</u>
Report Date	<u>July 31, 2018</u>
Period Covered by This Report	<u>From 01/01/2018 to 06/30/2018</u>
Period Covered by Previous Report	<u>From 07/01/2017 to 12/31/2017</u>
Name of Wastewater Treatment Plant	<u>San Jose/Santa Clara Water Pollution Control Plant</u>
NPDES Permit Number	<u>CA-0037842</u>

Person to contact concerning information contained in this report:

Name	<u>Casey Fitzgerald</u>
Title	<u>Pretreatment Program Manager</u>
Mailing Address	<u>200 East Santa Clara St., 7th Floor, San Jose, CA 95113</u>
Telephone Number	<u>(408) 793-5378</u>

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete.



Sharon Newton
Acting Deputy Director
Environmental Services Department
Watershed Protection

7/31/18

Date

**SAN JOSE-SANTA CLARA REGIONAL WASTEWATER FACILITY
2018 FIRST SEMIANNUAL INDUSTRIAL USER VIOLATION REPORT**

I. SAMPLING PROCEDURES

A. SAMPLE LOCATIONS

1. **Influent** - Samples of influent are collected from the raw sewage wet well by automatic sampler and grab sampling. This location corresponds to Station INF-001 as set forth in the Facility's NPDES Permit, CA-0037842.
2. **Effluent** - Samples of effluent are collected from the effluent wet well by automatic sampler and by grab sampling. This location corresponds to Station EFF-001 as set forth in the Facility's NPDES Permit, CA-0037842.
3. **Biosolids** - No samples for biosolid were available for collection from the Sludge Management Facility's drying beds for this monitoring period.

B. COLLECTION TIMES

1. **Automatic Sampling** - Automated sampling is performed using flow-proportioned, composite samplers that operate from midnight to midnight on consecutive days. Influent and effluent samples are taken during the same 24-hour period.
2. **Grab Sampling** - Grab samples are collected at a time corresponding to the Facility's maximum peak flow at 1230 hours.
3. **Biosolids Sampling** - Biosolid samples are collected if available, in February and August and within the same twenty-four hour period as when influent and effluent samples are collected.

C. COLLECTION METHODS

1. **Direct Collection** - Wastewater samples for volatile organic compounds, semi-volatile organics, Pesticide/Polychlorinated Biphenyl(PCB) Aroclor, mercury and cyanide analyses are collected as grab samples during Facility's projected peak flow. Samples for the analysis of volatile organic compounds (VOCs) are collected in 40-mL glass vials with Teflon[®]-lined septum and screw caps. The vials are filled to overflowing before being capped to avoid any headspace. Semi-volatile organic samples (BNA-base, neutral, acids) are collected in 1-liter amber glass bottles with Teflon[®]-lined screw caps. Pesticide/PCB Aroclor samples are collected in 1-liter amber glass bottles with Teflon[®]-lined screw caps. Mercury samples are collected utilizing clean hands techniques in 1-liter acid-rinsed amber glass bottles with Teflon[®]-lined screw caps. Cyanide samples are collected in 2-liter amber plastic containers.
2. **Automatic Collection** - Wastewater samples for metals analyses (excluding mercury) are collected using automated composite samplers. Samples are collected over a 24-hour period based on flow into plastic carboys within refrigerated samplers. Aliquots taken from the carboys for metals analysis are poured into 1-liter certified-clean plastic bottles.
3. **Biosolids Collection** - Dry and wet weather biosolid samples are collected from the Facility's drying beds. Twenty grab samples are collected and then composited into a single sample for subsequent analyses. Samples are collected by employing a grid pattern map for sample locations. Biosolid samples are collected directly into 250-ml borosilicate glass jars.

D. STORAGE, PRESERVATION, AND HOLDING TIMES

1. **EPA Method 624** - Samples for volatile organic compound analysis are stored at zero to six degrees Celsius and analyzed within three days of collection.

2. **EPA Method 625** - Samples for semi-volatile organic compound analysis are stored at zero to six degrees Celsius, extracted within seven days of collection and analyzed within thirty days of extraction.
3. **EPA Method 608** - Samples for pesticide/PCB Aroclor analysis are adjusted to a pH range of 5.0 to 9.0 with sodium hydroxide solution or sulfuric acid as needed, stored at zero to six degrees Celsius, extracted within seven days of collection and analyzed within forty days of extraction.
4. **Mercury** - Samples for total mercury analysis are preserved with 5 mL/L of BrCl solution and analyzed within 90 days of collection.
5. **Metals** - Samples for metals analysis (excluding mercury) are preserved with nitric acid to pH < 2 at least 24-hours prior to analysis and analyzed within six months of collection.
6. **Cyanide** – Samples for cyanide analysis are checked and, if present, treated for oxidizers and sulfides prior to preservation to pH>10 with sodium hydroxide, stored at zero to six degrees Celsius and analyzed within 14 days of collection.

II. METHOD OF SAMPLE DECHLORINATION

A. EFFLUENT SAMPLES

Dechlorination of effluent samples is not required since samples are collected downstream of the Facility's dechlorination process. The Facility uses sodium bisulfite injection for dechlorination.

B. INFLUENT SAMPLES

Influent may be pre-chlorinated at various times as an odor control measure. Sodium thiosulfate is used as a dechlorinating agent when necessary.

III. SAMPLE COMPOSITING

A. INFLUENT AND EFFLUENT SAMPLES

Priority Pollutant Metals - Samples for priority pollutant metals analysis (excluding mercury) are composited by automatic samplers based on the Facility's flow rates.

Volatile organics, semi-volatile organics, pesticides/PCB Aroclors, mercury, and cyanide samples are collected by grab sampling during the Facility's projected peak flow.

B. BIOSOLIDS

Twenty individual grab samples are composited and split into appropriate fractions for each of the individual analyses required.

IV. DATA VALIDATION

A. METHOD BLANKS

Method blanks are routinely analyzed to demonstrate that the entire laboratory analytical process and system does not introduce significant contaminant levels. A method blank is included in each sample preparation batch as required by the referenced analytical method.

B. FIELD BLANKS

Field blanks are routinely collected at sample collection sites and analyzed to assess any significant contaminant levels that may be introduced in the field or from the associated handling procedures during sample collection.

C. REPLICATES

Field replicates are collected and analyzed to determine the precision of the sampling process. Laboratory replicates are routinely analyzed to determine the precision of the analytical process.

D. SPIKED SAMPLES

Laboratory samples are routinely spiked with a known amount of the analyte(s) of interest to assess any sample matrix interferences or effects and to determine the accuracy of the analytical process or system. The addition of a matrix spike duplicate will assess the precision of analytical process.

E. QA/QC CRITERIA

Acceptance criteria for the above listed chemical parameters follow protocol and/or guidelines of the EPA (40 CFR 136, EPA SW-846, EPA 600/4-79/020), Standard Methods for the Examination of Water and Wastewater and the California Environmental Laboratory Accreditation Program of the State Water Resources Board.

F. ANALYTICAL METHODOLOGY

Methods and techniques used for all chemical determinations strictly adhere to procedures published by the EPA (40 CFR 136, EPA SW-846, EPA 600/4-79/020) or as published in the approved edition of Standard Methods for the Examination of Water and Wastewater.

G. CERTIFICATION STATEMENT [ATTACHED]

V. SAMPLE RESULTS

A. WET-WEATHER SEASON SAMPLING – FEBRUARY-MARCH 2018

See Appendix I - Data Tables.

VI. DISCUSSION OF RESULTS

A. INFLUENT DISCUSSION

Base Neutral Acids (BNA) by EPA 625

Results for three non-detected BNA analytes (Hexachloroethane, Hexachlorobutadiene, and 1,2,4-Trichlorobenzene) did not meet quality control acceptance criteria due to low recovery in the extracted blank spike associated with the analysis of the February BNA sample; results for the three analytes were qualified and not reported. A second sample was collected in March and analyzed by EPA Method 625, yielding acceptable quality control results for all analytes. Analytes were detected in both samples and are therefore included in this discussion.

Di-n-octyl phthalate is commonly added to plastics to keep them more soft or flexible. Di-n-octyl phthalate may be found in medical tubing, blood storage bags, carpet back coating, packaging films, floor tile, wire, cables, and adhesives, as well as cosmetics and pesticides. **Di-n-octyl phthalate was reported as DNQ (Detected, Not Quantified) at 2.8 µg/L.**

Para Cresol (p-Cresol) can be found in petroleum products, artificially produced from auto and diesel emissions, coal production wastewater, disinfectants, metal refining, and chemical manufacturing. **P-cresol was detected and reported at 102 µg/L in the February sample and at 63.7 µg/L in the March sample.** P-cresol is not a listed CTR compound.

Phenol is used as a precursor in a variety of industrial synthesis applications to produce resins, plastics, surfactants, detergents, emulsifiers, insecticides and medical antiseptics. Other uses of phenol include anesthetic applications in ointments, ear and nose drops and cold sore lotions; and as a slimicide for bacteria and fungi growth. **Phenol was detected and reported at 18.4 µg/L in the February sample and at 10.4 µg/L in the March sample.**

Butyl benzyl phthalate is used as a plasticizer mainly in polyvinyl chloride for vinyl floor tile, vinyl foams, and carpet backing, as well as cellulose plastics and polyurethane. **Butyl benzyl phthalate was reported as DNQ (Detected, Not Quantified) at 1.6 µg/L.**

Diethyl phthalate is ubiquitous in the environment based on its many applications. It is commonly used as a plasticizer in products including toothbrushes, automobile parts, tools, toys, and food packaging. Diethyl phthalate is also used in cosmetics, insecticides, and aspirin. **Diethyl phthalate was reported as DNQ (Detected, Not Quantified) at 1.4 µg/L.**

Volatile Organic Compounds (VOCs) by EPA 624

Chloroform is commonly used in a variety of industrial applications as a cleaning agent and as an extracting solvent. Indirect sources of chloroform primarily originate as a chlorination by-product in the treatment of water, wastewater and cooling water. **Chloroform was detected and reported at 6.4 µg/L.**

Ethylbenzene is used primarily in the production of styrene, a building block for the manufacture of polystyrene plastics and resins. It is also used as a solvent, as a constituent of asphalt and naphtha, and in fuels. **Ethylbenzene was reported as DNQ at 0.73 µg/L.**

Methylene Chloride is used as a solvent in paint strippers and removers; as a process solvent in the manufacture of drugs, pharmaceuticals, and film coatings; as a metal cleaning and finishing solvent in electronics manufacturing; and as an agent in urethane foam blowing. It is also used as a propellant in aerosols such as paints, automotive products and insect sprays. **Methylene Chloride was reported as DNQ at 0.64 µg/L.**

Toluene is used as a general purpose solvent, fuel additive, and chemical manufacturing constituent. Considerable amounts are discharged during the emissions, volatilization, storage, transport, and disposal of fuels and oils. **Toluene was detected and reported at 3.2 µg/L.**

Pesticides and Polychlorinated Biphenyl (PCB) Aroclors by EPA 608

There were no detectable amounts of pesticides or PCB Aroclors for this monitoring period in the Facility’s influent.

Priority Pollutant Metals & Cyanide

All priority pollutant metals (including mercury) and cyanide levels measured during this period were at concentrations characteristic of influent typically received by this Facility.

B. EFFLUENT DISCUSSION

Base Neutral Acids (BNA) by EPA 625; Volatile Organic Compounds (VOCs) by EPA 624; Pesticides and Polychlorinated Biphenyl (PCB) Aroclors by EPA 608:

The Priority Pollutant Organics requirement defined in Attachment E, Section VII of the Facility’s NPDES Permit for Pretreatment and Biosolids Monitoring (Table E-5) has been replaced by:

Constituents	Sampling Frequency			Sample Type	
	Influent INF-001 ^[1]	Effluent EFF-001 ^[1]	Biosolids BIO-001	Influent and Effluent	Biosolids ^[6]
VOC	<i>Unchanged. Refer to individual permits.</i>	Once per permit term	<i>Unchanged. Refer to individual permits.</i>	<i>Unchanged. Refer to individual permits.</i>	
BNA		Once per permit term			

As defined by **Order No. R2-2016-008: Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Bay Regional Monitoring Program.**

The Order, effective April 2016, reduces the frequency of the Facility's final effluent monitoring for priority pollutant organics to once per NPDES permit cycle. No final effluent samples for priority pollutant organics were collected or analyzed for this period.

Priority Pollutant Metals & Cyanide

All priority pollutant metals (including mercury) and cyanide levels measured during this period were at concentrations characteristic of the effluent discharged by this Facility. Priority pollutant metals and cyanide detected and reported in the effluent were below NPDES permit limitations.

C. BIOSOLIDS DISCUSSION

There were no available biosolids for collection from this Facility for the current semi-annual monitoring period.

QA/QC CERTIFICATION STATEMENT

Quality Assurance/Quality Control validation data was reviewed for each of the analytical measurements performed and deemed acceptable. Acceptance criteria were established using methodologies from Standard Methods for the Examination of Water and Wastewater, EPA references (40 CFR 136, EPA SW-846, EPA 600/4-79/020), or as specified by the California Environmental Laboratory Accreditation Program of the State Water Resources Board.



Noel Enoki
Environmental Laboratory Manager

Appendix I

DATE	As (influent)		As (effluent)		Cd (influent)		Cd (effluent)		Cr (influent)		Cr (effluent)		Cu (influent)		Cu (effluent)		Pb (influent)		Pb (effluent)		Hg (influent)		Hg (effluent)		Ni (influent)		Ni (effluent)		Se (influent)		Se (effluent)		Ag (influent)		Ag (effluent)		Zn (influent)		Zn (effluent)		Cyanide (influent)		Cyanide (effluent)	
	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L			
1/9/2018	1.93	0.75	DNQ0.17	ND	6.83	0.44	138	3.12	4.23	DNQ0.088	0.134	0.00107	8.91	3.95	2.34	0.71	DNQ0.29	ND	167	16.6	DNQ1.4	DNQ1.1																						
2/6/2018	1.75	0.83	DNQ0.26	ND	5.30	0.41	138	2.97	2.19	DNQ0.069	0.101	0.00115	7.24	4.10	2.39	0.87	0.45	ND	161	16.6	DNQ1.0	ND																						
3/5/2018	1.75	0.97	DNQ0.15	ND	5.96	0.40	129	2.95	2.81	DNQ0.083	0.078	0.00130	7.14	4.24	2.22	0.72	0.75	ND	156	15.8	DNQ1.6	ND																						
4/3/2018	1.90	0.85	DNQ0.12	ND	5.89	0.38	112	3.05	2.13	DNQ0.068	0.079	0.00126	7.36	3.97	2.32	0.69	0.48	ND	169	17.1	DNQ1.6	DNQ1.3																						
5/1/2018	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	ND	ND																					
5/3/2018	1.73	1.14	DNQ0.19	ND	4.80	0.43	127	3.10	2.28	DNQ0.078	0.118	0.00128	6.55	5.26	2.08	0.69	0.47	ND	162	22.5	n.a.	n.a.																						
6/5/2018	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	ND	ND																					
6/6/2018	2.25	1.18	DNQ0.18	ND	5.60	0.48	113	2.85	2.76	DNQ0.068	0.129	0.00108	7.26	4.67	2.00	0.60	0.45	ND	167	20.8	n.a.	n.a.																						

DNQ = Detected Not Quantified, "Estimated Concentration"

ND = Not Detected, below the method of detection.

n.a. = not available

RAW DATA

[available upon request]

Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Parameter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Advanced Surface Finishing Inc. 1181 N 4th St, Suite 50 San Jose, CA 95112 SJ-514B Flow = 344 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	3/13/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples at appropriate sample frequency. The cause of the violation was determined to be negligence on the part of the Industrial User (IU). The IU has commitment to sampling within the appropriate monitoring periods.	
Allergan 503 Vandell Way Campbell, CA 95008 WV-072B Flow = 958 40 CFR 439 Subpart A	IL	CC	CC	CC	4/3/2018	OTHER					VW	The violation was for failing to comply with a permit condition - failure to provide daily flowmeter totalizer readings. The causes of the violation were determined to be incorrect flowmeter measurements, improper documentation of wastewater discharges, and offsite hauling. The IU responded to the violation by setting up reminders, creating a spreadsheet to keep track of totalizer readings, using the newest Self-Monitoring Report (SMR) form for future reporting, and planning bi-annual check-ins with the City regarding SMR requirements.	

Compliance Status Key

SNF - Significant Noncompliance, Federal Limits	IL - Inconsistent Compliance, Local Limits	* - On Time Schedule (Dates)
SNL - Significant Noncompliance, Local Limits	IF - Inconsistent Compliance, Federal Limits	CC - Consistent Compliance
UN - Unknown	NS - Not scheduled to be Sampled for Compliance	

Enforcement Action Key

WN - Warning Notice	NV - Notice of Violation
VW - Verbal Warning	AC - Administrative Citation
SC - Sewer Surcharge	CM - Compliance Meeting
REF - Referral	

Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Para- meter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
<p>Alsco</p> <p>2275 Junction Ave San Jose, CA 95131 SJ-546B</p> <p>Flow = 63,316 SIU based on flow</p>	CC	CC	IL	IL	5/8/2017	OTHER					NV	<p>The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.</p>	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	5/15/2017	OTHER					NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Parameter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	8/27/2017	OTHER					NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Parameter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	9/5/2017	OTHER	pH	5.8 (min)			6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	9/7/2017	OTHER	pH	2.6 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	9/20/2017	OTHER	pH	5.8 (min)			6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.

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Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	10/23/2017	OTHER					NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	11/20/2017	OTHER					NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Alsco 2275 Junction Ave San Jose, CA 95131 SJ-546B Flow = 63,316 SIU based on flow	CC	CC	IL	IL	12/19/2017	OTHER	pH	3.6 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and for failing to comply with permit conditions - failure to maintain a continuous pH meter. A total of four pH violations with durations of one to five minutes were reported by the IU on each occurrence. The causes of the violations were determined to be incorrect plumbing of the water softeners, a faulty pH recorder, and operator error. The IU responded to the violations by re-plumbing the water softeners, ordering new pH equipment, and retraining operators, as verified during an inspection on 2/2/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Amex Plating, Inc. 3333 Woodward Ave Santa Clara, CA 95054 SC-182B Flow = 509 40 CFR 433.17 Subpart A	CC	IL	CC	IF/ IL	10/7/2017	OTHER	pH	5.1 (min)			6.0 (min)	NV	The violation was for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report the violation. The five-minute pH violation was identified during an inspection on 2/14/2018. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be inadequate treatment of wastewater and employee error. The IU responded to the violations by developing standard operating procedures (SOP), as verified during an inspection on 2/14/2018. The pH chart recorder was also reviewed and no further violations were noted.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Amex Plating, Inc. 3333 Woodward Ave Santa Clara, CA 95054 SC-182B Flow = 509 40 CFR 433.17 Subpart A	CC	IL	CC	IF/ IL	2/14/2018	OTHER					NV	The violation was for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report the violation. The five-minute pH violation was identified during an inspection on 2/14/2018. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be inadequate treatment of wastewater and employee error. The IU responded to the violations by developing standard operating procedures (SOP), as verified during an inspection on 2/14/2018. The pH chart recorder was also reviewed and no further violations were noted.	
APCT, Inc. 3495 De la Cruz Blvd Santa Clara, CA 95054 SC-434A Flow = 69,369 40 CFR 433.17 Subpart A	CC	IL	CC	IL	2/4/2018	OTHER	pH	12.8		<12.5	WN	The violation was for failing to meet the local pH limit, as noted on the IU's pH monitoring record. The 26-minute pH violation was reported by the IU on 2/5/2018. The cause of the violation was determined to be negligence on the part of the IU. The IU responded to the violation by retraining operators on treatment system startup procedures. Successive copies of the pH monitoring record submitted by the IU on 2/16/2018 were in compliance.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Applied Anodize, Inc. 622 Charcot Ave, Suite E San Jose, CA 95131 SJ-025B Flow = 673 40 CFR 433.17 Subpart A	IF/ IL	IF/ IL	CC	IL	1/24/2018	OTHER					WN	The violation was for failing to comply with a permit condition - analyzing samples using 40 CFR 136 methods. The cause of the violation was determined to be user error. The IU responded to the violation by retraining the employee responsible for sample collection.	
					4/25/2018	OTHER					WN	The violation was for failing to comply with a permit condition - analyzing samples using 40 CFR 136 methods. The cause of the violation was determined to be user error. The IU responded to the violation by contracting a laboratory to perform appropriate sample analysis.	

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Reporting Period 1/1/2018 to 6/30/2018

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Arnold's Metal Finishing 805 Aldo Ave, Unit 104 Santa Clara, CA 95054 SC-369B Flow = 7,656 40 CFR 433.17 Subpart A	CC	IL	SNF/ IL	NS	3/5/2018	OTHER					VW	The violation was for late submittal of an SMR that was due on 2/28/2018, but was not received until 3/5/2018. The IU has committed to timely submittal of reports in the future.	
Averatek Corp. 550 Nuttman St Santa Clara, CA 95054 SC-406B Flow = 29 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	NS	3/22/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples using appropriate sample type. The cause of the violation was determined to be lack of employee training. The IU responded to the violation by retraining employees responsible for sample collection and resampling using the appropriate sample type.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
<p>Cobham Advanced Electronic Solutions</p> <p>5350 Hellyer Ave San Jose, CA 95138-1003 SJ-591B</p> <p>Flow = 1,422 (on 08/22/17) 40 CFR 469 Subpart A 40 CFR 433.17 Subpart A</p>	IL	IL	IL	IL	9/19/2017	OTHER					WN	<p>The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failing to comply with permit conditions - failure to maintain pH monitoring equipment and failing to report violations. The IU failed to report two of the three pH violations within 24 hours. The four-hour pH violation was reported by the IU. The 25-minute and five-hour pH violations were identified during an inspection on 4/26/2018. The causes of the violations were determined to be an inappropriate pH probe model and operator error. The IU responded to the violations by replacing the pH probe, retraining employees, and improved record keeping. The pH monitoring record was also reviewed and no further violations were noted.</p>	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
<p>Cobham Advanced Electronic Solutions</p> <p>5350 Hellyer Ave San Jose, CA 95138-1003 SJ-591B</p> <p>Flow = 1,422 (on 08/22/17) 40 CFR 469 Subpart A 40 CFR 433.17 Subpart A</p>	IL	IL	IL	IL	11/10/2017	OTHER					WN	<p>The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failing to comply with permit conditions - failure to maintain pH monitoring equipment and failing to report violations. The IU failed to report two of the three pH violations within 24 hours. The four-hour pH violation was reported by the IU. The 25-minute and five-hour pH violations were identified during an inspection on 4/26/2018. The causes of the violations were determined to be an inappropriate pH probe model and operator error. The IU responded to the violations by replacing the pH probe, retraining employees, and improved record keeping. The pH monitoring record was also reviewed and no further violations were noted.</p>	

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<p>Cobham Advanced Electronic Solutions</p> <p>5350 Hellyer Ave San Jose, CA 95138-1003 SJ-591B</p> <p>Flow = 1,422 (on 08/22/17) 40 CFR 469 Subpart A 40 CFR 433.17 Subpart A</p>	IL	IL	IL	IL	2/23/2018	OTHER	pH	5.7 (min)		6.0 (min)	WN	<p>The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failing to comply with permit conditions - failure to maintain pH monitoring equipment and failing to report violations. The IU failed to report two of the three pH violations within 24 hours. The four-hour pH violation was reported by the IU. The 25-minute and five-hour pH violations were identified during an inspection on 4/26/2018. The causes of the violations were determined to be an inappropriate pH probe model and operator error. The IU responded to the violations by replacing the pH probe, retraining employees, and improved record keeping. The pH monitoring record was also reviewed and no further violations were noted.</p>	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
<p>Cobham Advanced Electronic Solutions</p> <p>5350 Hellyer Ave San Jose, CA 95138-1003 SJ-591B</p> <p>Flow = 1,422 (on 08/22/17) 40 CFR 469 Subpart A 40 CFR 433.17 Subpart A</p>	IL	IL	IL	IL	4/26/2018	OTHER					WN	<p>The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failing to comply with permit conditions - failure to maintain pH monitoring equipment and failing to report violations. The IU failed to report two of the three pH violations within 24 hours. The four-hour pH violation was reported by the IU. The 25-minute and five-hour pH violations were identified during an inspection on 4/26/2018. The causes of the violations were determined to be an inappropriate pH probe model and operator error. The IU responded to the violations by replacing the pH probe, retraining employees, and improved record keeping. The pH monitoring record was also reviewed and no further violations were noted.</p>	

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Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
CSL Operating, LLC 529 Aldo Ave Santa Clara, CA 95054 SC-427B Flow = 4,565 40 CFR 433.17 Subpart A	IF/ IL	CC	CC	CC	4/10/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples using appropriate sample type. The cause of the violation was determined to be lack of employee training. The IU responded to the violation by retraining employees responsible for sample collection.	
Elcon Precision, LLC 1009 Timothy Dr San Jose, CA 95133 SJ-640B Flow = 394 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	2/9/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples at appropriate sample frequency. The cause of the violation was determined to be a misunderstanding of the monitoring periods. The IU responded to the violations by reviewing permit monitoring periods and adjusting contract lab sampling frequencies.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
ENS Technology LLC 3165 Molinaro St Santa Clara, CA 95054 SC-252A Flow = 1,339 40 CFR 433.17 Subpart A	IL	CC	CC	CC	4/24/2018	OTHER					WN	The violation was for late submittal of a Wastewater Discharge Permit Application that was due on 4/6/2018, but was not received until 4/24/2018. The IU has committed to timely submittal of Wastewater Discharge Applications in the future.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Gordon Biersch Brewing Company, Inc. 357 E Taylor St San Jose, CA 95112-3105 SJ-352C Flow = 39,848 SIU based on flow	CC	IF/ IL	CC	CC	2/20/2018	OTHER	pH	3.1 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report one of the violations. The 4.35-hour pH violation was reported by the IU on 2/21/2018. The 6.35-hour pH violation was identified during an inspection on 2/22/2018. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be a faulty valve on the acid tank and an improperly configured pH control system. The IU responded to the violations by replacing the acid tank valves with stainless steel and reprogramming the pH control system to prevent discharge of low pH wastewater, as verified during an inspection on 3/29/2018. The pH chart recorder was also reviewed and no further violations were noted.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
<p>Gordon Biersch Brewing Company, Inc.</p> <p>357 E Taylor St San Jose, CA 95112-3105 SJ-352C</p> <p>Flow = 39,848 SIU based on flow</p>	CC	IF/ IL	CC	CC	2/21/2018	OTHER	pH	3.2 (min)	5.0 (min)	6.0 (min)	NV	<p>The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report one of the violations. The 4.35-hour pH violation was reported by the IU on 2/21/2018. The 6.35-hour pH violation was identified during an inspection on 2/22/2018. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be a faulty valve on the acid tank and an improperly configured pH control system. The IU responded to the violations by replacing the acid tank valves with stainless steel and reprogramming the pH control system to prevent discharge of low pH wastewater, as verified during an inspection on 3/29/2018. The pH chart recorder was also reviewed and no further violations were noted.</p> <p>AC \$500 fine issued for Corrosive Matter per San Jose Municipal Code 15.14.575.</p>	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Gordon Biersch Brewing Company, Inc. 357 E Taylor St San Jose, CA 95112-3105 SJ-352C Flow = 39,848 SIU based on flow	CC	IF/ IL	CC	CC	2/22/2018	OTHER						NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report one of the violations. The 4.35-hour pH violation was reported by the IU on 2/21/2018. The 6.35-hour pH violation was identified during an inspection on 2/22/2018. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be a faulty valve on the acid tank and an improperly configured pH control system. The IU responded to the violations by replacing the acid tank valves with stainless steel and reprogramming the pH control system to prevent discharge of low pH wastewater, as verified during an inspection on 3/29/2018. The pH chart recorder was also reviewed and no further violations were noted.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Gorilla Circuits 1509 Berger Dr San Jose, CA 95112 SJ-449B Flow = 75,123 40 CFR 433.17 Subpart A	IL	IL	CC	CC	11/19/2017	OTHER	pH	4.3 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report violations. The two five-minute pH violations and one two-minute violation were identified during inspections on 2/27/2018 and 4/20/2018. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be negligence on the part of the IU. The IU responded to the violations by retraining employees, updating procedures including daily email notifications, and installing an automatic self-closing valve. An inspection on 4/20/2018 verified the email notification system, training, and self-closing valve installation. The pH monitoring record was also reviewed and no further violations were noted, and successive copies of the pH monitoring record submitted by the IU on 5/4/2018 were in compliance.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Gorilla Circuits 1509 Berger Dr San Jose, CA 95112 SJ-449B Flow = 75,123 40 CFR 433.17 Subpart A	IL	IL	CC	CC	12/10/2017	OTHER	pH	2.7 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report violations. The two five-minute pH violations and one two-minute violation were identified during inspections on 2/27/2018 and 4/20/2018. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be negligence on the part of the IU. The IU responded to the violations by retraining employees, updating procedures including daily email notifications, and installing an automatic self-closing valve. An inspection on 4/20/2018 verified the email notification system, training, and self-closing valve installation. The pH monitoring record was also reviewed and no further violations were noted, and successive copies of the pH monitoring record submitted by the IU on 5/4/2018 were in compliance.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Gorilla Circuits 1509 Berger Dr San Jose, CA 95112 SJ-449B Flow = 75,123 40 CFR 433.17 Subpart A	IL	IL	CC	CC	2/27/2018	OTHER						NV The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report violations. The two five-minute pH violations and one two-minute violation were identified during inspections on 2/27/2018 and 4/20/2018. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be negligence on the part of the IU. The IU responded to the violations by retraining employees, updating procedures including daily email notifications, and installing an automatic self-closing valve. An inspection on 4/20/2018 verified the email notification system, training, and self-closing valve installation. The pH monitoring record was also reviewed and no further violations were noted, and successive copies of the pH monitoring record submitted by the IU on 5/4/2018 were in compliance.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Gorilla Circuits 1509 Berger Dr San Jose, CA 95112 SJ-449B Flow = 75,123 40 CFR 433.17 Subpart A	IL	IL	CC	CC	3/18/2018	OTHER	pH	5.0 (min)		6.0 (min)	NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report violations. The two five-minute pH violations and one two-minute violation were identified during inspections on 2/27/2018 and 4/20/2018. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be negligence on the part of the IU. The IU responded to the violations by retraining employees, updating procedures including daily email notifications, and installing an automatic self-closing valve. An inspection on 4/20/2018 verified the email notification system, training, and self-closing valve installation. The pH monitoring record was also reviewed and no further violations were noted, and successive copies of the pH monitoring record submitted by the IU on 5/4/2018 were in compliance.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Gorilla Circuits 1509 Berger Dr San Jose, CA 95112 SJ-449B Flow = 75,123 40 CFR 433.17 Subpart A	IL	IL	CC	CC	4/20/2018	OTHER					NV	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder, and failure to report violations. The two five-minute pH violations and one two-minute violation were identified during inspections on 2/27/2018 and 4/20/2018. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be negligence on the part of the IU. The IU responded to the violations by retraining employees, updating procedures including daily email notifications, and installing an automatic self-closing valve. An inspection on 4/20/2018 verified the email notification system, training, and self-closing valve installation. The pH monitoring record was also reviewed and no further violations were noted, and successive copies of the pH monitoring record submitted by the IU on 5/4/2018 were in compliance.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Haro's Anodizing Specialists 630 Walsh Ave Santa Clara, CA 95050 SC-222B Flow = 84 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	2/20/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples at appropriate sample frequency. The cause of the violation was determined to be a misunderstanding of the monitoring period. The IU responded to the violation by reviewing permit monitoring periods and adjusting contract lab sampling frequencies.	
HGST, Inc. 5601 Great Oaks Pkwy San Jose, CA 95119 SJ-495A Flow = 299,213 40 CFR 433.17 Subpart A	CC	CC	CC	CC	3/8/2018	IU	Cu	1.60		1.09	VW	The violation was for exceeding the federal monthly average copper concentration limit. The federal monthly average concentration limit violation was an average of one sample. The causes of the violation were late review of lab results and potentially high copper in cooling tower blowdown. The IU responded to the violation by retraining employees, arranging for advanced lab notifications of violations, and monitoring weekly blowdown data. The results of subsequent copper samples collected by the City on 4/25/2018 and 6/21/2018 and by the IU on 5/1/2018 were in compliance.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Intevac, Inc. 3580 Bassett St Santa Clara, CA 95054-2704 SC-259B Flow = 876 (estimated) 40 CFR 469 Subpart A	CC	CC	NS	IL	2/28/2018	OTHER	pH	3.8 (min)	5.0 (min)	6.0 (min)	WN	The violation was for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder. The three-minute pH violation was reported by the IU on 2/28/2018. The cause of the violation was determined to be a leak in the treatment tank. The IU responded to the violation by installing a polyvinyl liner in the tank. Successive copies of the pH monitoring record submitted by the IU on 3/22/2018 were in compliance.	
Kion Technology, Inc. 2190 Old Oakland Rd San Jose, CA 95131 SJ-191B Flow = 4 40 CFR 433.17 Subpart A	CC	CC	CC	CC	5/7/2018	POTW	Cr-T	1.02		1.0	VW	The violation was for exceeding the local maximum allowable total chromium concentration limit. The cause of the violation was determined to be infrequent cleaning and accumulation of sludge in the sample box. The IU responded to the violation by cleaning the sample box. An inspection on 7/2/2018 verified the sample box contained no sludge. The results of subsequent samples collected by the IU on 5/18/2018 and collected by the City on 6/25/2018 were in compliance.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Leiter's Enterprises, Inc. dba Leiter's Compounding Pharmacy 17 Great Oaks Blvd San Jose, CA 95119 SJ-663B Flow = 4 40 CFR 439 Subpart D	CC	NS	SNF	NS	12/1/2017	POTW	Ace	23		20.7		WN	The violations were for exceeding the federal monthly average and the federal daily maximum acetone concentration limits. The federal monthly average concentration limit violation was an average of one sample. The cause of the violations was determined to be an oversight on the part of a plumbing contractor. The IU responded to the violations by disconnecting the plumbing and requesting removal of the sample point in their permit. An inspection on 1/31/2018 verified the disconnection. Subsequent samples were not collected by the IU or by the City due to the removal of the sample point.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Leiter's Enterprises, Inc. dba Leiter's Compounding Pharmacy 17 Great Oaks Blvd San Jose, CA 95119 SJ-663B Flow = 4 40 CFR 439 Subpart D	CC	NS	SNF	NS	12/31/2017	POTW	Ace	23		8.2		WN	The violations were for exceeding the federal monthly average and the federal daily maximum acetone concentration limits. The federal monthly average concentration limit violation was an average of one sample. The cause of the violations was determined to be an oversight on the part of a plumbing contractor. The IU responded to the violations by disconnecting the plumbing and requesting removal of the sample point in their permit. An inspection on 1/31/2018 verified the disconnection. Subsequent samples were not collected by the IU or by the City due to the removal of the sample point.

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Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Parameter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Lenthor Engineering, Inc. 311 Turquoise St Milpitas, CA 95035 MI-141B Flow = 27,449 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	1/16/2018	IU	Cu	3.8		3.38	2.3	VW	The violation was for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper concentration limits. The federal monthly average concentration limit violation was an average of one sample. The cause of the violation was determined to be the use of faulty copper test strips. The IU responded to the violation by removing the product from the shop floor. An inspection on 2/7/2018 verified the faulty test strips have been removed and are no longer in use. The results of subsequent samples collected by the IU on 2/6/2018 and 2/8/2018 and collected by the City on 2/15/2018 and 3/7/2018 were in compliance.

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Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Lenthor Engineering, Inc. 311 Turquoise St Milpitas, CA 95035 MI-141B Flow = 27,449 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	1/31/2018	IU	Cu	3.80	2.07	VW	The violation was for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper concentration limits. The federal monthly average concentration limit violation was an average of one sample. The cause of the violation was determined to be the use of faulty copper test strips. The IU responded to the violation by removing the product from the shop floor. An inspection on 2/7/2018 verified the faulty test strips have been removed and are no longer in use. The results of subsequent samples collected by the IU on 2/6/2018 and 2/8/2018 and collected by the City on 2/15/2018 and 3/7/2018 were in compliance.		
					3/5/2018	OTHER				WN	The violation was for failing to comply with a permit condition - collecting samples at appropriate sample frequency. The cause of the violation was determined to be negligence on the part of the IU. The IU responded to the violations by reviewing permit monitoring periods and adjusting contract lab sampling frequencies.		

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Lumentum Operations LLC 1750 Automation Pkwy San Jose, CA 95131 SJ-674B Flow = 6,629 40 CFR 433.17 Subpart A	IF/ IL	CC	CC	CC	5/23/2018	OTHER					NV	The violations were for failure to protect from accidental discharge, failure to maintain pretreatment system equipment, and failing to meet the federal and local pH limits, as noted on the IU's pH monitoring record. The 2.5-hour pH violation was reported by the IU on 5/23/2018. The cause of the violation was determined to be a broken pH probe in the treatment tank. The IU responded to the violation by replacing the broken pH probe. An inspection on 7/5/2018 verified the replacement of probe. The pH monitoring records were also reviewed and no further violations were noted. In addition, the IU is required to submit a Slug Discharge Prevention Plan by 7/31/2018.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Lumentum Operations LLC 1750 Automation Pkwy San Jose, CA 95131 SJ-674B Flow = 6,629 40 CFR 433.17 Subpart A	IF/ IL	CC	CC	CC	5/23/2018	OTHER	pH	3.0 (min)	5.0 (min)	6.0 (min)	NV	The violations were for failure to protect from accidental discharge, failure to maintain pretreatment system equipment, and failing to meet the federal and local pH limits, as noted on the IU's pH monitoring record. The 2.5-hour pH violation was reported by the IU on 5/23/2018. The cause of the violation was determined to be a broken pH probe in the treatment tank. The IU responded to the violation by replacing the broken pH probe. An inspection on 7/5/2018 verified the replacement of probe. The pH monitoring records were also reviewed and no further violations were noted. In addition, the IU is required to submit a Slug Discharge Prevention Plan by 7/31/2018.	
											AC	\$500 fine issued for Corrosive Matter per San Jose Municipal Code 15.14.575.	

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San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Para- meter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Lumentum Operations, LLC 80 Rose Orchard Way San Jose, CA 95134 SJ-673B Flow = 25,061 40 CFR 469 Subpart A	IL	CC	CC	CC	4/11/2018	IU	As	13		1.0		NV	The violation was for exceeding the local maximum allowable arsenic concentration limit. The cause of the violation was determined to be a floc particle entering the sample point. The IU responded to the violation by collecting additional in-house samples to monitor pollutant concentrations. An inspection on 5/24/2018 verified sample box had been cleaned. The results of subsequent samples collected by the IU on 4/13/2018, 5/17/2018, 5/12/2018, 5/14/2018, 5/15/2018, 5/16/2018, 5/17/2018 and 5/18/2018, and collected by the City on 5/22/2018 and 5/30/2018 were in compliance. See 6/12/2018 Compliance Meeting for additional details.
												AC	\$1500 fine issued for Interfering Substances per San Jose Municipal Code 15.14.575.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
<p>Mass Precision, Inc.</p> <p>2110 Oakland Rd San Jose, CA 95131 SJ-664B</p> <p>Flow = 301 40 CFR 433.17 Subpart A</p>	CC	CC	IL	CC	10/8/2017	OTHER					CM	<p>At a Compliance Meeting held on 6/12/2018, the violations and Compliance Agreement schedule were discussed. The IU is required to investigate all potential contributing causes to the violation, submit updated SOPs for pretreatment system operation and maintenance, and retrain pretreatment system operators by 7/31/2018, and collect samples for three months – May 2018, June 2018, and July 2018.</p>	
											WN	<p>The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a broken pH meter. The IU responded to the violation by purchasing a new pH meter, as verified by an invoice submitted on 2/13/2018.</p>	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Microsemi, Inc. 3000 Oakmead Village Dr Santa Clara, CA 95051 SC-380B Flow = 2,590 (on 10/06/17) 40 CFR 469 Subpart A	CC	IL	CC	CC	1/11/2018	OTHER						VW	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a power shortage due to an open coil in one of the electrically actuated caustic dispense valves. The IU responded to the violation by installing a new dispense valve and implementing an alarm system for reporting power shortages, as verified during an inspection on 2/15/2018.
Mohawk Packing, Div. of John Morrell 1660 Old Bayshore Hwy San Jose, CA 95112 SJ-373C Flow = 24,447 SIU based on flow	IL	CC	CC	CC	4/4/2018	OTHER	pH	5.8 (min)		6.0 (min)		WN	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report the violation. The 20-minute pH violation was identified during an inspection on 4/19/2018. The IU failed to report the pH violation within 24 hours. The cause of the violation was determined to be a pH probe malfunction. The IU responded to the violation by replacing the pH probe, retraining employees, and installing an automatic discharge shutoff valve that engages when pH approaches permit limits. Successive copies of the pH monitoring record submitted by the IU were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Mohawk Packing, Div. of John Morrell 1660 Old Bayshore Hwy San Jose, CA 95112 SJ-373C Flow = 24,447 SIU based on flow	IL	CC	CC	CC	4/19/2018	OTHER						WN The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report the violation. The 20-minute pH violation was identified during an inspection on 4/19/2018. The IU failed to report the pH violation within 24 hours. The cause of the violation was determined to be a pH probe malfunction. The IU responded to the violation by replacing the pH probe, retraining employees, and installing an automatic discharge shutoff valve that engages when pH approaches permit limits. Successive copies of the pH monitoring record submitted by the IU were in compliance.	
Momentum Technologies Corp. dba Momentum Metal Finishing 1232 Memorex Dr Santa Clara, CA 95050 SC-381B Flow = 672 40 CFR 433.17 Subpart A	CC	IL	IL	IF/ IL	10/19/2017	OTHER						NV The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a faulty pH recorder. The IU responded to the violation by replacing the recorder, as verified during an inspection on 6/7/2018.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Momentum Technologies Corp. dba Momentum Metal Finishing 1232 Memorex Dr Santa Clara, CA 95050 SC-381B Flow = 672 40 CFR 433.17 Subpart A	CC	IL	IL	IF/ IL	1/2/2018	OTHER					NV	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a faulty pH recorder. The IU responded to the violation by replacing the recorder, as verified during an inspection on 6/7/2018.	
					1/8/2018	OTHER					NV	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a faulty pH recorder. The IU responded to the violation by replacing the recorder, as verified during an inspection on 6/7/2018.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Momentum Technologies Corp. dba Momentum Metal Finishing 1232 Memorex Dr Santa Clara, CA 95050 SC-381B Flow = 672 40 CFR 433.17 Subpart A	CC	IL	IL	IF/ IL	1/15/2018	OTHER					NV	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a faulty pH recorder. The IU responded to the violation by replacing the recorder, as verified during an inspection on 6/7/2018.	
PacTech USA 328 Martin Ave Santa Clara, CA 95050 SC-343B Flow = 1,735 40 CFR 433.17 Subpart A	NS	CC	IL	CC	12/11/2017	OTHER					VW	The violation was for late submittal of an SMR that was due on 11/30/2017, but was not received until 12/11/2017. The IU has committed to timely submission of reports in the future.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Prudential Overall Supply 1429 N Milpitas Blvd Milpitas, CA 95035 MI-040B Flow = 44,213 SIU based on flow	NS	IL	CC	CC	2/22/2018	OTHER					WN	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be negligence on the part of the IU. The IU responded to the violation by establishing standard protocols and training staff to ensure the pH monitoring equipment is fully functional at all times, as verified during an inspection on 3/27/2018. The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be a faulty pH probe. The IU responded to the violation by replacing the faulty probe, as verified during an inspection on 6/14/2018.	
QualTech Circuits, Inc. 1101 Comstock St Santa Clara, CA 95054 SC-345B Flow = 304 40 CFR 433.17 Subpart A	IL	CC	NS	CC	6/1/2018	OTHER					VW		

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A Flow = 114,687 (on 12/19/17) 40 CFR 433.17 Subpart A	NS	IF/ IL	NS	CC	3/21/2018	OTHER					WN	The violation was for improper use of diluting waters. The cause of the violation was determined to be reverse osmosis reject water discharging to the sample point. The IU responded to the violation by submitting flow data for the dilution stream and a proposal for replumbing the reverse osmosis reject water downstream of the sample point. The IU's permit may be amended to adjust federal discharge limits using the Combined Wastestream Formula or the dilution stream may be replumbed downstream of the sample point. An inspection will be scheduled in the third quarter of 2018 to determine the best corrective action.	
Silicon Microstructures, Inc. 1701 McCarthy Blvd Milpitas, CA 95035 MI-108B Flow = 26,659 (on 12/06/17) 40 CFR 469 Subpart A	IL	NS	CC	IF/ IL	5/24/2018	OTHER					VW	The violation was for late submittal of additional Wastewater Discharge Permit Application information that was due on 5/24/2018, but not received until 6/14/2018. The IU has committed to timely submittal of requested information in the future.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Suez WTS Services USA, Inc. 5900 Silver Creek Valley Rd San Jose, CA 95138 SJ-690B Flow = 121,918 (on 07/26/17) SIU based on flow	CC	CC	IL	CC	11/19/2017	OTHER					VW	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be operator error. The IU responded to the violation by retraining employees and adding recurring reminders to its compliance calendar.	
SunPower Corporation 51 Rio Robles San Jose, CA 95134 SJ-636B Flow = 5,288 (on 11/28/17) 40 CFR 469 Subpart A	IL	CC	CC	NS	5/13/2018	OTHER					VW	The violation was for failing to comply with a permit condition - failure to maintain pH monitoring equipment. The cause of the violation was determined to be negligence on the part of the IU. The IU will respond to the violation by training employees.	

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
Swift Metal Finishing 1161 Richard Ave Santa Clara, CA 95050 SC-035B Flow = 1,664 (on 08/16/17) 40 CFR 433.17 Subpart A	CC	IL	IL	CC	2/6/2018	POTW	Ni	0.57		0.5	NV	The violation was for exceeding the local maximum allowable nickel concentration limit. The cause of the violation was determined to be excess concentration of nickel in the nickel acetate bath, as well as an insufficient dragout process. The IU responded to the violation by reducing the nickel concentration in the bath and installing a dragout tank for the line. An inspection on 3/29/2018 verified the installation of the new dragout tank. The results of subsequent samples collected by the IU on 3/16/2018 and collected by the City on 4/3/2018 were in compliance.	
					2/16/2018	OTHER					WN	The violation was for late submittal of a Wastewater Discharge Permit Application that was due on 2/14/2018, but was not received until 2/16/2018. The IU has committed to timely submittal of Wastewater Discharge Applications in the future.	

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	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Max		
THAT Corporation 505 Fairview Way Milpitas, CA 95035 MI-078B Flow = 2,739 40 CFR 469 Subpart A	CC	CC	CC	CC	1/12/2018	OTHER	pH	5.6 (min)		6.0 (min)	VW	The violation was for failing to meet the local pH limit, as noted on the IU's pH chart recorder. The two-minute pH violation was reported by the IU on 1/12/2018. The cause of the violation was determined to be failure of the pH probe in stage one of the treatment system. The IU responded to the violation by cleaning and inspecting the faulty probe and scheduling treatment system review with the system manufacturer. Successive copies of the pH monitoring record submitted by the IU on 1/23/2018 were in compliance.	
TTM Technologies North America, LLC. 335 Turtle Creek Ct San Jose, CA 95125 SJ-625B Flow = 47,220 40 CFR 433.17 Subpart A	CC	CC	CC	CC	5/8/2018	OTHER	pH	5.48 (min)		6.0 (min)	VW	The violation was for failing to meet the local minimum pH limit, as noted on the IU's pH chart recorder. The one-minute pH violation was reported by the IU on 5/9/2018. The cause of the violation was determined to be improper maintenance of a pretreatment pH probe. The IU responded to the violation by retraining its operators to perform preventative maintenance on pH probes regularly. The pH chart recorder was also reviewed and no further violations were noted.	

Compliance Status Key

SNF - Significant Noncompliance, Federal Limits
 SNL - Significant Noncompliance, Local Limits
 UN - Unknown

IL - Inconsistent Compliance, Local Limits
 IF - Inconsistent Compliance, Federal Limits
 NS - Not scheduled to be Sampled for Compliance

* - On Time Schedule (Dates)
 CC - Consistent Compliance

Enforcement Action Key

WN - Warning Notice
 VW - Verbal Warning
 SC - Sewer Surcharge
 REF - Referral
 NV - Notice of Violation
 AC - Administrative Citation
 CM - Compliance Meeting

Semi-Annual Industrial User Violation Report

San José-Santa Clara Regional Wastewater Facility

Reporting Period 1/1/2018 to 6/30/2018

Facility Name and Address	Semi-Annual Compliance Status				Date Violation occurred	Taken By POTW/ IU/ OTHER	Parameter	Samples in Violation				Enf. Act.	Comments on Follow up, Corrective, or Enforcement Action Taken
	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2018	Q1 2018	Q4 2017	Q3 2017				Max	Avg	Federal Max	Local Avg		
Uni-Flex Circuits, Inc. 1782 Angela St San Jose, CA 95125-1253 SJ-399B Flow = 437 (on 10/18/17) 40 CFR 433.17 Subpart A	CC	IF/ IL	IF/ IL	CC	10/18/2017	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples at appropriate sample frequency. The cause of the violation was determined to be negligence on the part of the IU. The IU responded to the violation by adding calendar reminders for future due dates.	
					3/7/2018	OTHER					WN	The violation was for failing to comply with a permit condition - collecting samples using appropriate sample type. The cause of the violation was determined to be negligence on the part of the IU. The IU responded to the violation by confirming correct sample methods with facility staff and sampling contractors, and submitting an SMR with appropriate sample collection methods on 7/13/2018.	

Compliance Status Key

SNF - Significant Noncompliance, Federal Limits	IL - Inconsistent Compliance, Local Limits	* - On Time Schedule (Dates)
SNL - Significant Noncompliance, Local Limits	IF - Inconsistent Compliance, Federal Limits	CC - Consistent Compliance
UN - Unknown	NS - Not scheduled to be Sampled for Compliance	

Enforcement Action Key

WN - Warning Notice	NV - Notice of Violation
VW - Verbal Warning	AC - Administrative Citation
SC - Sewer Surcharge	CM - Compliance Meeting
REF - Referral	

COMPLIANCE WITH PRETREATMENT PROGRAM REQUIREMENTS

2016 Pretreatment Compliance Inspection

On April 5, 2018, the City received the 2016 City of San José Pretreatment Compliance Inspection (PCI) Summary Report (2016 PCI Summary Report) for an inspection conducted by EPA contractors, Tetra Tech, Inc., on June 27-29, 2016. The City first responded to the findings in a report sent to the Regional Board and EPA on June 4, 2018. The City has responded to all findings of the 2016 PCI Summary Report; a summary is included as Attachment 1. The response is organized by the type of finding. Table 1 addresses all requirements and Table 2 addresses all recommendations.

July 31, 2018 Response to June 27-29, 2016
Pretreatment Compliance Inspection Summary Report

Table 1: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Requirements

#	Description	Response	Target Date
1	<p>The Babbitt Bearing Company, Inc. permit incorrectly classified the applicable categorical standards. The Significant Industrial User’s (SIU’s) permit indicates the facility is subject to categorical standards established at 40 CFR 413, Subparts A, B, and D; however, the facility is only subject to Subpart A. The regulations at 40 CFR 403.8(f)(1)(iii) require that SIU permits contain applicable pretreatment standards. The City is required to revise the permit to reflect the correct applicable categorical standards. (Section 7.1, Application of Categorical Standards)</p>	<p>The City has re-evaluated the categorical standards applicable to Babbitt Bearing Company, Inc. and has amended the permit to indicate that the facility is subject to categorical standards under 40 CFR 433, Subpart A. A synopsis of the federal categorical determination is discussed in the attached inspection report. A copy of the amended permit was included as Attachment 1 and a copy of the inspection report was included as Attachment 2 in the 6/5/2018 Pretreatment Compliance Inspection (PCI) Summary Report Response (6/5/2018 Response).</p>	Complete
2	<p>The City allowed AlSCO a variance for the oil and grease local limit; however, the City did not demonstrate that it had the authority to allow this variance. The regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require the City to apply applicable pretreatment standards to its SIUs. The inspectors could not verify whether the City has the legal authority to allow variance of the oil and grease limit. The City is required to demonstrate to the Water Board that it has this legal authority. (Section 7.2, Effluent Limitations)</p>	<p>The City Attorney’s Office has clarified that the City does not have legal authority in the Municipal Code to allow a variance of local limits. The City has conveyed to AlSCO that the City cannot continue a variance. The City has identified alternate methods for monitoring Oil & Grease with minimum detergent interference and is in the process of amending AlSCO’s permit.</p>	Complete

Table 1: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Requirements

#	Description	Response	Target Date
3	<p>The permit for Headway Technologies, Inc. applies the local limits to the discharge as instantaneous limits and requires composite sampling; however, the facility’s self-monitoring reports indicate grab samples were collected. The regulations at 40 CFR 403.8(f)(2)(iv) require the City to review reports to ensure permit limits are met. The City is required to establish monitoring requirements that are appropriate to the type of discharge limit and further, to ensure the industrial user is using the correct sampling methods. (Section 8.4, Requesting, Receiving, and Analyzing Reports)</p>	<p>The City reviewed Headway Technologies, Inc. Self-Monitoring Reports (SMRs) from April 2013 to March 2016 and did not find any inconsistencies with permit limits, monitoring requirements, and sampling methods. Headway Technologies, Inc. permit was included as Attachment 3 and copies of the SMRs reviewed during the 2016 PCI were included as Attachment 4 in the 6/5/2018 Response.</p>	Complete

Table 1: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Requirements

4	<p>The City allowed Headway Technologies, Inc., to submit resampling data in excess of the 30-day required timeframe. The regulations at 40 CFR 403.12(g)(2), and the City’s permits, require an industrial user to resample within 30 days of being notified of a violation. The City must require SIUs to conduct resampling according to 40 CFR403.12 (g)(2) and the SIU’s permit. (Section 8.4, Requesting, Receiving, and Analyzing Reports)</p>	<p>Note: The City has reviewed this finding and confirms the finding was for Jennings Technology Corporation (as mentioned in Section 9.0, Enforcement), and not for Headway Technologies, Inc. as indicated under Section 10.1, Requirements in the 2016 PCI Report.</p> <p>The City noted the date error on the Jennings Technology Corporation enforcement action. However, Jennings Technology Corporation did submit resampling data within 30 days of becoming aware of the violation. City procedures require Industrial Users (IUs) to conduct resampling in accordance with 40 CFR 403.12(g)(2) and the conditions of the discharge permit. In response to this Requirement, the City has modified its enforcement action approval guidance and staff training for processing enforcement actions. Additionally, the City highlighted the resampling requirements in the November 2016 <i>Tributary Tribune</i> newsletter, which is a publication distributed to all permitted IUs. A copy of the updated guidance document was included as Attachment 5 and a copy of the November 2016 <i>Tributary Tribune</i> newsletter was included as Attachment 6 in the 6/5/2018 Response.</p>	Complete
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Table 2: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Recommendations

#	Description	Response	Target Date
1	<p>The Cobham permit does not specify whether the facility is an existing or new source subject to 40 CFR 433 and 469. It is strongly recommended that the permit clearly specify whether the discharger is subject to existing or new source pretreatment standards [40 CFR 403.8(f)(1)(ii)]. It is also strongly recommended that the City review all CIU permits to ensure that they clearly state the complete classification of each CIU. (Section 7.1, Application of Categorical Standards)</p>	<p>The City has reviewed permits for all Categorical Industrial Users (CIUs) to ensure they clearly specify whether the discharge is subject to Existing or New Source Pretreatment Standards per 40 CFR 403.8(f)(1)(ii). The City has amended all permits as necessary to reflect the appropriate pretreatment standard type. A copy of Cobham's amended permit showing applicable pretreatment standards was included as Attachment 7 in the 6/5/2018 Response.</p>	Complete
2	<p>The Headway permit included discharge limitations for Total Toxic Organics (TTO) that reflected a combination of TTO limits prescribed by 40 CFR Parts 433 and 469; however, a single combined limitation for TTO is inappropriate because 40 CFR Parts 433 and 469 have separate pollutants under the individual categorical standards. Tetra Tech recommends that the City revert back to sampling for TTOs at the end of each process and apply the respective categorical limits at that point. Or, the City could provide documentation that the Water Board or Environmental Protection Agency (EPA) approved this application of the CWF prior to the City's implementation of it. (Section 7.2, Effluent Limitations)</p>	<p>The City uses EPA's Guidance Manual for Implementing TTOs Pretreatment Standards as a reference to calculate TTO limits. Section 5.3 (Page 5-2) discusses alternate TTO limits using the Combined Wastestream Formula (CWF). All TTO compounds on the 469 TTO list are included in the 433 TTO list, so using the 433 list for CWF calculations would be appropriate. A presentation by Jan Pickrel, U.S. EPA Office of Wastewater Management (OWM), and Chuck Durham, Tetra Tech, Inc., on "Metal Finishing Category: Its Curiosities, TOMP & Simple Combined Wastestream Formula Example", also discusses the application of CWF for modifying TTO limits. A copy of the presentation was included as Attachment 8 in the 6/5/2018 Response.</p>	Complete

Table 2: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Recommendations

#	Description	Response	Target Date
3	The file reviews revealed that the City’s Chain of Custody (COC) form specifies sodium thiosulfate as the preservative for cyanide samples collected. Any preservative that is used must be documented on the chain of custody form. The inspection team recommended the City revise their form, for instance, to include a check box for preservatives used. (Section 8.1, Compliance Sampling)	The City has updated the COC template to document all preservatives used during sample collection. A copy of an updated COC template was included as Attachment 9 in the 6/5/2018 Response.	Complete
4	During the site visit at Universal Semiconductor, the facility representative noted that the mobile transfer cart stored a small amount of hydrofluoric acid. The inspector recommended transferring the hydrofluoric acid to the appropriate longer-term hazardous waste container outdoors, instead of holding it in the mobile transfer cart indoors. (Section 8.3, Nondomestic Discharger Site Visits Conducted During the Inspection)	Hazardous waste storage and handling is not part of the City’s Pretreatment Program’s regulatory jurisdiction; however, inspectors may make recommendations for spill prevention practices at sites. Additionally, the City has established procedures for the referral of suspected hazardous waste violations to appropriate agencies for further action and will continue to refer cases as necessary.	Complete
5	The inspection team recommended that that City follow up with Babbitt Bearing Company, Inc. regarding the addition of a tin casting line to the facility operations. If the facility discharges this wastestream, local limits would apply to the discharge. (Section 8.3, Nondomestic Discharger Site Visits Conducted During the Inspection)	The City has confirmed during an inspection conducted on 9/8/2016 that Babbitt Bearing Company, Inc. does not perform tin casting. The only categorical operation conducted at this facility is hard chrome plating. The 9/8/2016 inspection report was included as Attachment 2 in the 6/5/2018 Response.	Complete

Table 2: July 31, 2018 Response to 2016 Pretreatment Compliance Inspection Summary Report – Recommendations

6	<p>The file review revealed that Solvent Management Plans (SMP) submitted by Crain Cutter and Universal Semiconductor lack any date stamp; therefore, it is difficult to discern if these plans are current to the facility. It is recommended that the City at a minimum, stamp plans with the date of receipt. (Section 8.4, Requesting, Receiving, and Analyzing Reports)</p>	<p>The City has a staff policy and procedure for stamping documents with the date of receipt. In response to this Recommendation, the City purchased new stamps for staff and refreshed training for stamping plans upon receipt. The City will continue to ensure the protocol is implemented.</p>	Complete
7	<p>The site visits conducted at AlSCO and Mohawk Packing revealed that industrial users believe that they are required to sample during the last month of the sampling and reporting period. The inspection team recommended that the City educate permittees that they are able to sample at any time during the sampling and reporting period. (Section 8.4, Requesting, Receiving, and Analyzing Reports)</p>	<p>The City has various outreach programs in place to educate its permitted facilities on pretreatment-related topics on an ongoing basis, including the <i>Tributary Tribune</i> newsletter and <i>Industrial User Academy (IU Academy)</i>. Additionally, the City’s “Self-Monitoring Report Fact Sheet” (SMR Fact Sheet) explains how to calculate sampling periods. This topic was revisited in the November 2016 <i>Tributary Tribune</i> newsletter. Permittees are also reminded of their sampling and reporting periods and requirements during inspections and annually during the <i>IU Academy</i>. A copy of the November 2016 <i>Tributary Tribune</i> newsletter was included as Attachment 6, the SMR Fact Sheet was included as Attachment 10, and relevant <i>IU Academy</i> presentation slides were included as Attachment 11 in the 6/5/2018 Response.</p>	Complete