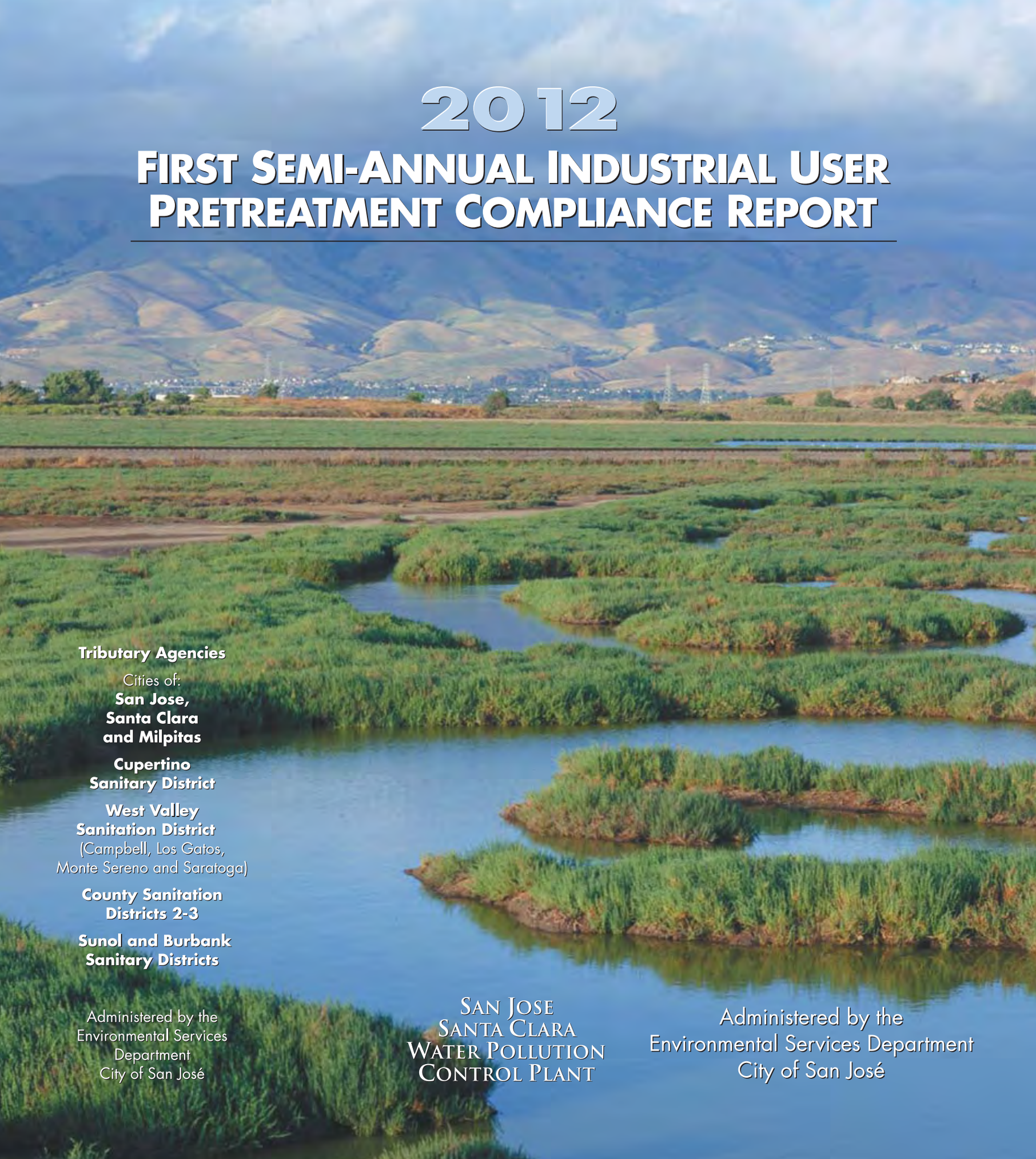
2012

First Semi-Annual Industrial User Pretreatment Compliance Report



Tributary Agencies

Cities of:
San Jose,
Santa Clara
and Milpitas

Cupertino
Sanitary District

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

County Sanitation
Districts 2-3

Sunol and Burbank
Sanitary Districts

Administered by the
Environmental Services
Department
City of San José

San Jose
Santa Clara
Water Pollution
Control Plant

Administered by the
Environmental Services Department
City of San José

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

Environmental Services Department

July 31, 2012

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

SUBJECT: San Jose/Santa Clara Water Pollution Control Plant
2012 First Semi-Annual Industrial User Pretreatment Report
NPDES Permit No. CA-0037842

Dear Mr. Wolfe:

Enclosed is the San Jose/Santa Clara Water Pollution Control Plant 2012 First Semi-Annual Industrial User Pretreatment Report, which includes laboratory data on influent, effluent, and sludge monitoring results; compliance tables; and an update on our compliance with pretreatment program requirements.

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 lead agency of a regional joint powers authority, the City operates the San Jose/Santa Clara Water Pollution Control Plant (Plant), and provides wastewater treatment to over 1.4 million residents and 16,000 businesses, including many of the leading computer and electronics manufacturing companies that make up "Silicon Valley." The City is also responsible for limiting the Plant effluent discharges to the South San Francisco Bay (South Bay), as required by its National Pollutant Discharge Elimination System (NPDES) Permit. The Plant continues to maintain significant industrial pollutant reductions achieved over the years by enforcing stringent regulations, limiting the amount of pollutants that industries can discharge into the sanitary sewer system, and implementing aggressive pollution prevention and recycle and reuse programs.

This report also includes an update to the 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection. All of the facility specific and procedural issues have been addressed through inspections, enforcement, and procedural changes. This report includes an update to the response and work plan for action items. The compliance tables also include many of the enforcement actions required or recommended by these summary reports.

The 2012 First Semi-Annual Industrial User Pretreatment Report is submitted in accordance with Provision E 5 of the Regional Board Order No. R2 2009-0038. 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 2012. 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 2011 Annual Pretreatment Program Report. These definitions are consistent with those found in 40 CFR 403.8(f)(2)(vii)(A-H) and are designated as Significant Non-compliance Federal and Significant Non-compliance Local.

At the end of the second quarter of 2012, the Plant was monitoring 295 industries, of which 163 were Significant Industrial Users and 132 were Non-Categorical Industries discharging under 25,000 gallons per day. Of the 163 Significant Industrial Users, 132 were Categorical Industrial Users, 17 were Zero Discharge Categorical Industrial Users, and the remaining 14 were classified by their quantity of 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 SJ/SC WPCP Tributary Area

Category	1st Quarter 2012		2nd Quarter 2012	
	Federal	Local	Federal	Local
Consistent compliance	95.2%	89.8%	94.0%	92.9%
Inconsistent compliance	3.6%	8.4%	3.6%	4.2%
Significant Non-compliance	1.2%	1.8%	2.4%	3.0%

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 these reports, please contact Casey Fitzgerald, Senior Environmental Inspector, at (408) 793-5378.

Sincerely,

KERRIE ROMANOW
Acting Director Environmental Services

cc: Ken Greensberg, USEPA Region 9
Keith Silva, USEPA Region 9
Phil Isorena, SWRCB
Michael Chee, RWQCB

SAN JOSE/SANTA CLARA WATER POLLUTION CONTROL PLANT
2012 FIRST SEMIANNUAL INDUSTRIAL USER VIOLATION REPORT

COVER SHEET

NPDES Permit Holder or Sewer Authority Name	The Cities of San José and Santa Clara
Report Date	July 31, 2012
Period Covered by This Report	From 01/01/2012 to 06/30/2012
Period Covered by Previous Report	From 07/01/2011 to 12/31/2011
Name of Wastewater Treatment Plant	San Jose/Santa Clara Water Pollution Control Plant
NPDES Permit Number	CA-0037842

Person to contact concerning information contained in this report:

Name	Casey Fitzgerald
Title	Senior Environmental Inspector
Mailing Address	200 East Santa Clara St., 7th Floor, San Jose, CA 95113
Telephone Number	(408) 793-5378

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.

Napp Fukuda
Acting Deputy Director
Environmental Services Department
Watershed Protection

7/16/12
Date

Influent, Effluent, and Sludge Monitoring Results Pretreatment First 2012 Semi-Annual Report

I. SAMPLING PROCEDURES

A. SAMPLE LOCATIONS

1. **Influent -** Samples of influent are collected from the raw sewage wet well by automatic sampler and by grab sampling. This location corresponds to Station I-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 E-001 as set forth in the facility's NPDES Permit, CA-0037842.
3. **Biosolids -** March samples for sludge are collected from the Sludge Management Facility's dried stock piles during the wet weather season.

B. COLLECTION TIMES

1. **Automatic Sampling -** Automated sampling is accomplished 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 the time corresponding to maximum peak flow, 1400 hours.
3. **Biosolids Sampling -** Sludge samples are collected during March and September, generally at the time when influent and effluent samples are collected.

C. COLLECTION METHOD

1. **Direct Collection -** Wastewater samples used for VOC and BNA analyses are made up of a minimum of four (4) discrete grab samples collected every six hours during the 24-hour sampling event, and flow composited in the lab just prior to analysis. Samples for the analysis of Volatile Organic Compounds (VOCs) are collected directly into 40-mL glass vials with Teflon septum, screw caps. The vials are filled to overflowing before being capped to avoid any headspace. Semi-volatile organic compounds are collected directly into 1-liter amber glass bottles. Samples are refrigerated and stored in the dark after collection. Mercury samples are collected by grab sampling directly into 1-liter Teflon bottles every 6 hours utilizing clean hands techniques. These grab samples are then flow composited into one sample representing a 24 hour period.
2. **Automatic Collection -** Wastewater samples for influent and effluent metal analyses, except effluent samples for mercury analysis, are collected using automated composite samplers. Samples are collected into plastic containers contained within the refrigerated samplers. Samples are then refrigerated and stored in the dark after collection.
3. **Biosolids Collection –** Dry weather season sludge samples are collected from the drying beds while wet-weather season sludge samples are collected from the dried stockpiles. In both cases, twenty grab samples are collected and then composited into a single sample for analysis. Samples from the drying beds are collected employing a grid pattern for sample location. Samples from the stockpiles are collected at random depth and location. Sludge samples are stored in borosilicate glass after collection.

D. STORAGE, PRESERVATION, AND HOLDING TIMES

1. **EPA Method 624 -** Samples for Volatile Organic Compound analysis are stored in glass vials, with Teflon-lined caps or septum, at four degrees Centigrade. Sodium thiosulfate is used to remove residual chlorine when necessary. Samples are analyzed within seven days.
2. **EPA Method 625 -** Samples for Semi-Volatile Organic Compound analysis are stored in amber glass containers, with Teflon-lined caps or septum, at four degrees Centigrade. Sodium thiosulfate is used to remove residual chlorine when necessary. Samples are extracted within seven days and analyzed within thirty days.
3. **Influent and Effluent Metals -** Samples for influent and effluent metal analysis, except for mercury, are stored in plastic or glass containers at four degrees Centigrade. Samples are preserved with nitric acid to a pH < 2 and analyzed within six months. Samples for mercury analysis are preserved with 5 mL/L of BrCl solution and analyzed within 90 days.

II. METHOD OF SAMPLE DECHLORINATION

A. EFFLUENT SAMPLES

Dechlorination of effluent samples is not required since the samples are collected downstream of the facility's dechlorination process. The treatment plant uses sulfur dioxide 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, except for mercury, are flow-proportion composited by automatic samplers. Mercury samples are collected by grab sampling every six hours.

B. BIOSOLIDS

Each of the twenty grab samples is hand composited, then 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 analytical system is interference-free and to demonstrate that contaminated glassware or reagents did not influence the analytical measurements.

B. TRAVEL BLANKS

Travel blanks are routinely submitted with wastewater samples collected to demonstrate that contamination did not occur during sample collection or transport.

C. REPLICATES

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

D. SPIKED SAMPLES

Laboratory samples are routinely spiked with the analyte(s) of interest to determine the accuracy of the 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) and of the California Department of Health Services.

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 latest approved edition of Standard Methods for the Examination of Water and Wastewater.

G. CERTIFICATION STATEMENT [ATTACHED]

V. SAMPLE RESULTS

A. WET-WEATHER SEASON SAMPLING – MARCH 1, 2012

See Appendix I - Data Tables.

VI. DISCUSSION OF RESULTS

A. INFLUENT DISCUSSION

Bis(2-ethylhexyl)phthalate is a common plasticizer for polymeric materials (plastic pipe). Bis(2-ethyl-hexyl)phthalate is used primarily as a plasticizer during polyvinyl chloride and polymer production and is likely released into wastewater after water contact with plastic materials. **Chloroform** is likely to enter the environment with its use as an industrial solvent, extractant, and cleaning agent as well as from indirect production in the chlorination of drinking water, wastewater, and cooling water. Artificial sources of chloroform include automobile exhaust, extractants, solvents, dry cleaning agents, fumigants, and synthetic rubber. If released into water, chloroform will be primarily lost by evaporation into the atmosphere. Chloroform may be subject to significant biodegradation based upon laboratory experiments, although the reported scientific literature is conflicting. **Dichloromethane**, **a.k.a. methylene chloride**, is used as a solvent, degreasing agent, and as a cleaning agent. Large quantities of methylene chloride are used each year in aerosols, paint removers, and chemical processing with most being released to the atmosphere. Releases to water will primarily be removed by evaporation. Methylene chloride is not expected to adsorb to sediment or bioconcentrate in aquatic organisms. **Ethylbenzene** is a colorless organic liquid with a sweet, gasoline-like odor. The greatest use of ethylbenzene is to make styrene, another organic liquid used as a building block for many plastics. It is also used as a solvent for coatings, and in making rubber and plastic wrap. Ethylbenzene is released to the air primarily from its use in gasoline, and more localized due to wastewater discharge and spills from its production and industrial use. **Phenol** is a common industrial chemical that enters wastewater during its use in resins, plastics, and adhesives. It is

frequently found in wastewater from other commercial sources. **Toluene** is used as a general purpose solvent, as a fuel additive, and as a chemical manufacturing constituent. Considerable amounts are discharged during the storage, transport, and disposal of fuels and oils.

Priority pollutant metals were measured at concentrations characteristic of influent typically received by this facility. On 03/16/2012, however, an influent sample analyzed by ICPMS was found to have a lead concentration of 266,000 micrograms per liter (µg/L). This sample was reanalyzed using a comparison method (ICP) and was found to have a lead concentration of 244,000 µg/L. Effluent samples from 03/16/2012 and 03/17/2012 were analyzed and were found to have lead concentrations of 0.86 and 0.46 µg/L, respectively, which are consistent with typical effluent lead concentrations. Influent samples from 03/17/2012 and 03/18/2012 were also analyzed and were found to have lead concentrations of 4.47 and 3.49 µg/L, respectively, which are consistent with typical influent lead concentrations. The abnormally high concentration of lead in this influent sample is attributed to a random event, as such, this sample is not considered to be representative of Plant influent.

B. EFFLUENT DISCUSSION

Bromodichloromethane enters the environment primarily through its inadvertent formation during chlorination treatment processes of drinking water and wastewater. Bromodichloromethane is also biosynthesized and emitted to the environment by various species of marine micro algae that are abundant in the world's oceans. The general population is exposed through oral consumption of contaminated drinking water, beverages, and food products; inhalation of contaminated air; and dermal exposure to chlorinated swimming pool water. **Chloroform** is likely to enter the environment with its use as an industrial solvent, extractant, and cleaning agent as well as from indirect production in the chlorination of drinking water, wastewater, and cooling water. Artificial sources of chloroform include automobile exhaust, extractants, solvents, dry cleaning agents, fumigants, and synthetic rubber. If released into water, chloroform will be primarily lost by evaporation into the atmosphere. Chloroform may be subject to significant biodegradation based upon laboratory experiments, although the reported scientific literature is conflicting. **Dibromochloromethane** enters the environment primarily through its inadvertent formation during chlorination treatment processes of drinking water and wastewater. Dibromochloromethane is not produced or used on a large commercial scale indicating that significant releases do not occur from such industrial practices.

Priority pollutant metals were measured at concentrations characteristic of effluent discharged by this facility. All priority pollutant metals detected in the effluent were below NPDES permit limitations.

C. BIOSOLIDS DISCUSSION

Volatile organic compounds (EPA Method 8260B) and Semi Volatile organic compounds (EPA Method 8270B) were not measured in biosolids above respective detection limits in sludge samples collected and analyzed during March 2012. No priority pollutant organics were detected in amounts that would adversely affect Class A sludge disposal options.

Priority pollutant metals were measured at concentrations characteristic of typical biosolid production at this facility. No priority pollutant metals were detected in amounts that would adversely affect Class A sludge disposal options.

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 the latest edition of Standard Methods for the Examination of Water and Wastewater, from EPA references (40 CFR 136, EPA SW-846, EPA 600/4-79/020), or as specified by the California Department of Health Services.

Alo Kauravlla

Alo Kauravlla
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
1/1/2012	1.40	n.a.	<0.40	n.a.	4.02	n.a.	109	n.a.	1.97	n.a.	n.a.	n.a.	6.86	n.a.	n.a.	n.a.	<0.40	n.a.	155	n.a.	n.a.	n.a.
1/2/2012	1.46	n.a.	<0.40	n.a.	3.60	n.a.	102	n.a.	2.12	n.a.	n.a.	n.a.	6.59	n.a.	n.a.	n.a.	<0.40	n.a.	161	n.a.	n.a.	n.a.
1/3/2012	1.56	n.a.	<0.40	n.a.	3.94	n.a.	113	n.a.	6.26	n.a.	n.a.	n.a.	8.94	n.a.	n.a.	n.a.	0.62	n.a.	159	n.a.	n.a.	n.a.
1/4/2012	1.71	0.69	<0.40	<0.10	4.06	0.36	112	6.16	2.90	0.25	0.184	0.00149	9.45	5.13	1.43	0.30	0.73	<0.10	174	20.6	<3.0	<3.0
1/5/2012	1.57	n.a.	<0.40	n.a.	7.29	n.a.	120	n.a.	3.13	n.a.	n.a.	n.a.	19.1	n.a.	n.a.	n.a.	0.85	n.a.	175	n.a.	n.a.	n.a.
1/6/2012	1.45	n.a.	<0.40	n.a.	16.2	n.a.	115	n.a.	3.19	n.a.	n.a.	n.a.	31.6	n.a.	n.a.	n.a.	0.66	n.a.	181	n.a.	n.a.	n.a.
1/7/2012	1.85	n.a.	<0.40	n.a.	3.82	n.a.	167	n.a.	3.36	n.a.	n.a.	n.a.	10.4	n.a.	n.a.	n.a.	0.57	n.a.	164	n.a.	n.a.	n.a.
1/8/2012	1.84	n.a.	<0.40	n.a.	3.85	n.a.	128	n.a.	3.12	n.a.	n.a.	n.a.	9.07	n.a.	n.a.	n.a.	0.41	n.a.	171	n.a.	n.a.	n.a.
1/9/2012	2.08	n.a.	<0.40	n.a.	6.75	n.a.	241	n.a.	5.30	n.a.	n.a.	n.a.	13.1	n.a.	n.a.	n.a.	0.82	n.a.	187	n.a.	n.a.	n.a.
1/10/2012	1.97	n.a.	<0.40	n.a.	6.12	n.a.	128	n.a.	3.52	n.a.	n.a.	n.a.	13.7	n.a.	n.a.	n.a.	0.92	n.a.	167	n.a.	n.a.	n.a.
1/11/2012	1.77	n.a.	<0.40	n.a.	5.40	n.a.	127	n.a.	4.34	n.a.	n.a.	n.a.	11.2	n.a.	n.a.	n.a.	0.88	n.a.	168	n.a.	n.a.	n.a.
1/12/2012	2.19	n.a.	<0.40	n.a.	6.62	n.a.	141	n.a.	12.2	n.a.	n.a.	n.a.	11.9	n.a.	n.a.	n.a.	0.98	n.a.	180	n.a.	n.a.	n.a.
1/13/2012	1.74	n.a.	<0.40	n.a.	5.61	n.a.	134	n.a.	5.28	n.a.	n.a.	n.a.	10.7	n.a.	n.a.	n.a.	0.77	n.a.	175	n.a.	n.a.	n.a.
1/14/2012	1.61	n.a.	<0.40	n.a.	4.31	n.a.	113	n.a.	3.44	n.a.	n.a.	n.a.	8.14	n.a.	n.a.	n.a.	0.61	n.a.	171	n.a.	n.a.	n.a.
1/15/2012	1.55	n.a.	<0.40	n.a.	5.15	n.a.	114	n.a.	3.31	n.a.	n.a.	n.a.	10.2	n.a.	n.a.	n.a.	0.48	n.a.	181	n.a.	n.a.	n.a.
1/16/2012	1.75	n.a.	<0.40	n.a.	7.00	n.a.	134	n.a.	2.94	n.a.	n.a.	n.a.	11.2	n.a.	n.a.	n.a.	0.74	n.a.	196	n.a.	n.a.	n.a.
1/17/2012	1.62	n.a.	<0.40	n.a.	4.72	n.a.	121	n.a.	5.72	n.a.	n.a.	n.a.	9.81	n.a.	n.a.	n.a.	0.77	n.a.	163	n.a.	n.a.	n.a.
1/18/2012	2.06	n.a.	<0.40	n.a.	5.61	n.a.	130	n.a.	3.27	n.a.	n.a.	n.a.	11.1	n.a.	n.a.	n.a.	0.84	n.a.	181	n.a.	n.a.	n.a.
1/19/2012	1.87	n.a.	<0.40	n.a.	5.46	n.a.	133	n.a.	4.37	n.a.	n.a.	n.a.	9.19	n.a.	n.a.	n.a.	0.94	n.a.	185	n.a.	n.a.	n.a.
1/20/2012	1.65	n.a.	<0.40	n.a.	4.86	n.a.	123	n.a.	9.55	n.a.	n.a.	n.a.	10.7	n.a.	n.a.	n.a.	0.82	n.a.	176	n.a.	n.a.	n.a.
1/21/2012	1.80	n.a.	<0.40	n.a.	5.24	n.a.	123	n.a.	4.25	n.a.	n.a.	n.a.	10.3	n.a.	n.a.	n.a.	0.72	n.a.	205	n.a.	n.a.	n.a.
1/22/2012	1.63	n.a.	<0.40	n.a.	4.52	n.a.	119	n.a.	2.94	n.a.	n.a.	n.a.	7.91	n.a.	n.a.	n.a.	0.68	n.a.	181	n.a.	n.a.	n.a.
1/23/2012	1.78	n.a.	<0.40	n.a.	7.01	n.a.	149	n.a.	9.50	n.a.	n.a.	n.a.	11.4	n.a.	n.a.	n.a.	0.66	n.a.	181	n.a.	n.a.	n.a.
1/24/2012	1.73	n.a.	<0.40	n.a.	6.99	n.a.	143	n.a.	3.97	n.a.	n.a.	n.a.	15.0	n.a.	n.a.	n.a.	0.76	n.a.	185	n.a.	n.a.	n.a.
1/25/2012	2.06	n.a.	<0.40	n.a.	7.61	n.a.	167	n.a.	7.19	n.a.	n.a.	n.a.	13.9	n.a.	n.a.	n.a.	0.88	n.a.	219	n.a.	n.a.	n.a.
1/26/2012	1.83	n.a.	<0.40	n.a.	4.72	n.a.	129	n.a.	5.82	n.a.	n.a.	n.a.	9.30	n.a.	n.a.	n.a.	0.76	n.a.	187	n.a.	n.a.	n.a.
1/27/2012	1.56	n.a.	<0.40	n.a.	4.50	n.a.	136	n.a.	6.23	n.a.	n.a.	n.a.	8.34	n.a.	n.a.	n.a.	0.62	n.a.	177	n.a.	n.a.	n.a.
1/28/2012	1.78	n.a.	<0.40	n.a.	13.5	n.a.	126	n.a.	3.70	n.a.	n.a.	n.a.	20.8	n.a.	n.a.	n.a.	0.57	n.a.	179	n.a.	n.a.	n.a.
1/29/2012	1.61	n.a.	<0.40	n.a.	4.54	n.a.	109	n.a.	3.64	n.a.	n.a.	n.a.	8.65	n.a.	n.a.	n.a.	0.51	n.a.	161	n.a.	n.a.	n.a.
1/30/2012	1.65	n.a.	<0.40	n.a.	5.12	n.a.	125	n.a.	4.01	n.a.	n.a.	n.a.	9.46	n.a.	n.a.	n.a.	0.95	n.a.	179	n.a.	n.a.	n.a.
1/31/2012	1.55	n.a.	<0.40	n.a.	4.75	n.a.	107	n.a.	4.14	n.a.	n.a.	n.a.	8.81	n.a.	n.a.	n.a.	0.81	n.a.	167	n.a.	n.a.	n.a.
2/1/2012	1.56	n.a.	<0.40	n.a.	4.83	n.a.	118	n.a.	7.05	n.a.	n.a.	n.a.	11.0	n.a.	n.a.	n.a.	0.68	n.a.	171	n.a.	n.a.	n.a.
2/2/2012	1.51	n.a.	<0.40	n.a.	4.64	n.a.	111	n.a.	3.48	n.a.	n.a.	n.a.	11.8	n.a.	n.a.	n.a.	0.71	n.a.	160	n.a.	n.a.	n.a.
2/3/2012	1.60	n.a.	<0.40	n.a.	4.97	n.a.	127	n.a.	3.72	n.a.	n.a.	n.a.	11.1	n.a.	n.a.	n.a.	0.77	n.a.	206	n.a.	n.a.	n.a.
2/4/2012	1.64	n.a.	0.41	n.a.	5.62	n.a.	130	n.a.	14.3	n.a.	n.a.	n.a.	11.7	n.a.	n.a.	n.a.	1.02	n.a.	216	n.a.	n.a.	n.a.
2/5/2012	1.52	n.a.	<0.40	n.a.	4.56	n.a.	116	n.a.	14.3	n.a.	n.a.	n.a.	9.67	n.a.	n.a.	n.a.	0.53	n.a.	185	n.a.	n.a.	n.a.
2/6/2012	1.74	0.66	<0.40	<0.10	4.56	0.45	124	3.15	2.90	0.53	0.101	0.00147	9.80	5.49	4.65	0.46	0.70	<0.10	196	27.1	<3.0	<3.0
2/7/2012	1.82	n.a.	<0.40	n.a.	4.64	n.a.	134	n.a.	3.81	n.a.	n.a.	n.a.	9.31	n.a.	n.a.	n.a.	0.80	n.a.	189	n.a.	n.a.	n.a.
2/8/2012	1.83	n.a.	<0.40	n.a.	4.92	n.a.	142	n.a.	3.38	n.a.	n.a.	n.a.	11.2	n.a.	n.a.	n.a.	0.96	n.a.	190	n.a.	n.a.	n.a.
2/9/2012	1.82	n.a.	<0.40	n.a.	5.78	n.a.	136	n.a.	3.85	n.a.	n.a.	n.a.	12.8	n.a.	n.a.	n.a.	0.86	n.a.	181	n.a.	n.a.	n.a.
2/10/2012	1.59	n.a.	<0.40	n.a.	5.44	n.a.	121	n.a.	8.12	n.a.	n.a.	n.a.	16.0	n.a.	n.a.	n.a.	0.85	n.a.	175	n.a.	n.a.	n.a.
2/11/2012	1.97	n.a.	<0.40	n.a.	4.09	n.a.	129	n.a.	3.41	n.a.	n.a.	n.a.	10.2	n.a.	n.a.	n.a.	0.92	n.a.	166	n.a.	n.a.	n.a.

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
2/12/2012	2.26	n.a.	<0.40	n.a.	4.24	n.a.	116	n.a.	2.94	n.a.	n.a.	n.a.	8.27	n.a.	n.a.	n.a.	0.50	n.a.	171	n.a.	n.a.	n.a.
2/13/2012	1.78	n.a.	<0.40	n.a.	4.58	n.a.	114	n.a.	4.23	n.a.	n.a.	n.a.	17.6	n.a.	n.a.	n.a.	0.80	n.a.	159	n.a.	n.a.	n.a.
2/14/2012	1.91	n.a.	<0.40	n.a.	4.96	n.a.	130	n.a.	4.13	n.a.	n.a.	n.a.	9.79	n.a.	n.a.	n.a.	1.72	n.a.	177	n.a.	n.a.	n.a.
2/15/2012	2.21	n.a.	<0.40	n.a.	6.02	n.a.	145	n.a.	4.76	n.a.	n.a.	n.a.	16.6	n.a.	n.a.	n.a.	0.87	n.a.	200	n.a.	n.a.	n.a.
2/16/2012	1.75	n.a.	<0.40	n.a.	5.64	n.a.	125	n.a.	3.57	n.a.	n.a.	n.a.	13.8	n.a.	n.a.	n.a.	0.90	n.a.	174	n.a.	n.a.	n.a.
2/17/2012	1.86	n.a.	<0.40	n.a.	5.75	n.a.	138	n.a.	4.73	n.a.	n.a.	n.a.	12.5	n.a.	n.a.	n.a.	0.80	n.a.	209	n.a.	n.a.	n.a.
2/18/2012	2.53	n.a.	<0.40	n.a.	4.67	n.a.	130	n.a.	2.72	n.a.	n.a.	n.a.	11.2	n.a.	n.a.	n.a.	1.35	n.a.	180	n.a.	n.a.	n.a.
2/19/2012	1.99	n.a.	<0.40	n.a.	5.42	n.a.	148	n.a.	3.50	n.a.	n.a.	n.a.	11.5	n.a.	n.a.	n.a.	0.76	n.a.	210	n.a.	n.a.	n.a.
2/20/2012	1.85	n.a.	<0.40	n.a.	8.82	n.a.	129	n.a.	2.66	n.a.	n.a.	n.a.	10.1	n.a.	n.a.	n.a.	0.74	n.a.	196	n.a.	n.a.	n.a.
2/21/2012	1.77	n.a.	<0.40	n.a.	4.78	n.a.	127	n.a.	4.29	n.a.	n.a.	n.a.	11.6	n.a.	n.a.	n.a.	0.78	n.a.	185	n.a.	n.a.	n.a.
2/22/2012	2.18	n.a.	<0.40	n.a.	4.72	n.a.	132	n.a.	4.19	n.a.	n.a.	n.a.	9.78	n.a.	n.a.	n.a.	1.33	n.a.	188	n.a.	n.a.	n.a.
2/23/2012	1.83	n.a.	<0.40	n.a.	4.32	n.a.	113	n.a.	7.73	n.a.	n.a.	n.a.	17.0	n.a.	n.a.	n.a.	0.74	n.a.	174	n.a.	n.a.	n.a.
2/24/2012	1.61	n.a.	<0.40	n.a.	4.27	n.a.	112	n.a.	2.61	n.a.	n.a.	n.a.	9.72	n.a.	n.a.	n.a.	1.01	n.a.	165	n.a.	n.a.	n.a.
2/25/2012	1.68	n.a.	<0.40	n.a.	3.94	n.a.	111	n.a.	3.76	n.a.	n.a.	n.a.	9.76	n.a.	n.a.	n.a.	0.63	n.a.	170	n.a.	n.a.	n.a.
2/26/2012	2.26	n.a.	<0.40	n.a.	3.91	n.a.	178	n.a.	2.36	n.a.	n.a.	n.a.	8.54	n.a.	n.a.	n.a.	0.60	n.a.	175	n.a.	n.a.	n.a.
2/27/2012	1.70	n.a.	<0.40	n.a.	3.88	n.a.	116	n.a.	4.38	n.a.	n.a.	n.a.	9.95	n.a.	n.a.	n.a.	0.91	n.a.	172	n.a.	n.a.	n.a.
2/28/2012	2.30	n.a.	<0.40	n.a.	4.01	n.a.	119	n.a.	10.2	n.a.	n.a.	n.a.	9.98	n.a.	n.a.	n.a.	1.00	n.a.	167	n.a.	n.a.	n.a.
2/29/2012	2.06	n.a.	<0.40	n.a.	5.59	n.a.	127	n.a.	2.99	n.a.	n.a.	n.a.	14.9	n.a.	n.a.	n.a.	0.80	n.a.	208	n.a.	n.a.	n.a.
3/1/2012	1.90	0.98	<0.40	<0.10	7.44	0.51	160	4.21	7.29	0.27	0.0870	0.00275	14.7	7.13	1.67	0.56	1.10	<0.10	197	30.3	<3.0	7.2
3/2/2012	1.79	n.a.	<0.40	n.a.	5.97	n.a.	134	n.a.	2.91	n.a.	n.a.	n.a.	10.8	n.a.	n.a.	n.a.	0.82	n.a.	182	n.a.	n.a.	n.a.
3/3/2012	1.64	n.a.	<0.40	n.a.	4.90	n.a.	126	n.a.	2.46	n.a.	n.a.	n.a.	10.0	n.a.	n.a.	n.a.	0.64	n.a.	166	n.a.	n.a.	n.a.
3/4/2012	1.47	n.a.	<0.40	n.a.	4.33	n.a.	127	n.a.	2.45	n.a.	n.a.	n.a.	7.85	n.a.	n.a.	n.a.	0.45	n.a.	183	n.a.	n.a.	n.a.
3/5/2012	1.69	n.a.	<0.40	n.a.	4.78	n.a.	155	n.a.	18.0	n.a.	n.a.	n.a.	10.2	n.a.	n.a.	n.a.	1.42	n.a.	189	n.a.	n.a.	n.a.
3/6/2012	1.89	n.a.	<0.40	n.a.	6.05	n.a.	129	n.a.	13.3	n.a.	n.a.	n.a.	12.4	n.a.	n.a.	n.a.	0.81	n.a.	185	n.a.	n.a.	n.a.
3/7/2012	1.71	n.a.	<0.40	n.a.	4.62	n.a.	147	n.a.	3.75	n.a.	n.a.	n.a.	10.9	n.a.	n.a.	n.a.	1.17	n.a.	174	n.a.	n.a.	n.a.
3/8/2012	1.59	n.a.	<0.40	n.a.	4.47	n.a.	126	n.a.	6.20	n.a.	n.a.	n.a.	9.58	n.a.	n.a.	n.a.	0.74	n.a.	166	n.a.	n.a.	n.a.
3/9/2012	1.72	n.a.	<0.40	n.a.	4.89	n.a.	121	n.a.	3.61	n.a.	n.a.	n.a.	9.53	n.a.	n.a.	n.a.	0.79	n.a.	169	n.a.	n.a.	n.a.
3/10/2012	1.82	n.a.	<0.40	n.a.	4.34	n.a.	134	n.a.	3.16	n.a.	n.a.	n.a.	9.28	n.a.	n.a.	n.a.	0.70	n.a.	176	n.a.	n.a.	n.a.
3/11/2012	1.85	n.a.	<0.40	n.a.	4.50	n.a.	118	n.a.	2.55	n.a.	n.a.	n.a.	8.23	n.a.	n.a.	n.a.	0.60	n.a.	181	n.a.	n.a.	n.a.
3/12/2012	1.91	n.a.	<0.40	n.a.	4.86	n.a.	133	n.a.	3.70	n.a.	n.a.	n.a.	22.2	n.a.	n.a.	n.a.	0.84	n.a.	199	n.a.	n.a.	n.a.
3/13/2012	2.01	n.a.	<0.40	n.a.	4.76	n.a.	117	n.a.	13.9	n.a.	n.a.	n.a.	13.6	n.a.	n.a.	n.a.	0.84	n.a.	170	n.a.	n.a.	n.a.
3/14/2012	1.78	n.a.	<0.40	n.a.	6.62	n.a.	127	n.a.	3.77	n.a.	n.a.	n.a.	12.3	n.a.	n.a.	n.a.	0.92	n.a.	185	n.a.	<3.0	<3.0
3/15/2012	1.83	n.a.	<0.40	n.a.	4.64	n.a.	126	n.a.	2.57	n.a.	n.a.	n.a.	9.44	n.a.	n.a.	n.a.	0.84	n.a.	164	n.a.	<3.0	<3.0
3/16/2012	2.21	1.06	<0.40	<0.10	4.27	0.44	107	3.63	266000	0.89	n.a.	n.a.	9.01	5.95	n.a.	n.a.	2.06	<0.10	167	22.7	<3.0	<3.0
3/17/2012	2.03	1.18	<0.40	<0.10	3.83	0.52	107	3.44	4.47	0.46	n.a.	n.a.	8.26	6.08	n.a.	n.a.	0.93	<0.10	178	25.4	n.a.	n.a.
3/18/2012	2.09	n.a.	<0.40	n.a.	4.27	n.a.	110	n.a.	3.49	n.a.	n.a.	n.a.	8.63	n.a.	n.a.	n.a.	0.53	n.a.	169	n.a.	n.a.	n.a.
3/19/2012	2.05	n.a.	<0.40	n.a.	4.49	n.a.	119	n.a.	4.88	n.a.	n.a.	n.a.	15.1	n.a.	n.a.	n.a.	0.75	n.a.	239	n.a.	n.a.	n.a.
3/20/2012	2.86	n.a.	<0.40	n.a.	4.84	n.a.	123	n.a.	6.33	n.a.	n.a.	n.a.	13.1	n.a.	n.a.	n.a.	0.92	n.a.	189	n.a.	n.a.	n.a.
3/21/2012	2.25	n.a.	<0.40	n.a.	4.85	n.a.	211	n.a.	4.58	n.a.	n.a.	n.a.	11.8	n.a.	n.a.	n.a.	0.79	n.a.	194	n.a.	n.a.	n.a.
3/22/2012	2.03	n.a.	<0.40	n.a.	4.90	n.a.	128	n.a.	3.52	n.a.	n.a.	n.a.	11.8	n.a.	n.a.	n.a.	0.90	n.a.	188	n.a.	n.a.	n.a.
3/23/2012	1.73	n.a.	<0.40	n.a.	5.07	n.a.	122	n.a.	5.62	n.a.	n.a.	n.a.	11.7	n.a.	n.a.	n.a.	1.31	n.a.	181	n.a.	n.a.	n.a.
3/24/2012	1.84	n.a.	<0.40	n.a.	4.83	n.a.	116	n.a.	2.79	n.a.	n.a.	n.a.	11.2	n.a.	n.a.	n.a.	0.60	n.a.	189	n.a.	n.a.	n.a.

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
3/25/2012	1.89	n.a.	<0.40	n.a.	5.34	n.a.	112	n.a.	16.9	n.a.	n.a.	n.a.	11.7	n.a.	n.a.	n.a.	0.52	n.a.	184	n.a.	n.a.	n.a.
3/26/2012	2.03	n.a.	<0.40	n.a.	203	n.a.	122	n.a.	3.26	n.a.	n.a.	n.a.	73.6	n.a.	n.a.	n.a.	0.77	n.a.	176	n.a.	n.a.	n.a.
3/27/2012	2.19	n.a.	<0.40	n.a.	6.26	n.a.	149	n.a.	5.44	n.a.	n.a.	n.a.	15.7	n.a.	n.a.	n.a.	0.85	n.a.	219	n.a.	n.a.	n.a.
3/28/2012	2.04	n.a.	<0.40	n.a.	5.52	n.a.	135	n.a.	4.00	n.a.	n.a.	n.a.	23.0	n.a.	n.a.	n.a.	1.79	n.a.	203	n.a.	n.a.	n.a.
3/29/2012	1.79	n.a.	<0.40	n.a.	4.46	n.a.	136	n.a.	3.89	n.a.	n.a.	n.a.	12.7	n.a.	n.a.	n.a.	0.90	n.a.	177	n.a.	n.a.	n.a.
3/30/2012	1.82	n.a.	<0.40	n.a.	4.60	n.a.	123	n.a.	3.58	n.a.	n.a.	n.a.	11.6	n.a.	n.a.	n.a.	0.84	n.a.	176	n.a.	n.a.	n.a.
3/31/2012	1.77	n.a.	<0.40	n.a.	4.36	n.a.	528	n.a.	9.86	n.a.	n.a.	n.a.	12.9	n.a.	n.a.	n.a.	0.73	n.a.	434	n.a.	n.a.	n.a.
4/1/2012	1.68	n.a.	<0.40	n.a.	3.97	n.a.	114	n.a.	9.71	n.a.	n.a.	n.a.	9.25	n.a.	n.a.	n.a.	1.03	n.a.	171	n.a.	n.a.	n.a.
4/2/2012	1.81	n.a.	<0.40	n.a.	4.32	n.a.	114	n.a.	4.35	n.a.	n.a.	n.a.	11.7	n.a.	n.a.	n.a.	0.61	n.a.	165	n.a.	n.a.	n.a.
4/3/2012	1.78	n.a.	<0.40	n.a.	4.15	n.a.	117	n.a.	3.39	n.a.	n.a.	n.a.	10.5	n.a.	n.a.	n.a.	1.11	n.a.	167	n.a.	n.a.	n.a.
4/4/2012	1.78	n.a.	<0.40	n.a.	8.63	n.a.	125	n.a.	3.33	n.a.	n.a.	n.a.	11.6	n.a.	n.a.	n.a.	1.07	n.a.	206	n.a.	n.a.	n.a.
4/5/2012	2.42	0.94	<0.40	<0.10	7.69	0.56	168	3.33	4.59	0.48	0.0937	0.00124	12.6	7.23	1.70	0.54	0.94	<0.10	217	26.0	<3.0	<3.0
4/6/2012	1.69	n.a.	<0.40	n.a.	5.84	n.a.	137	n.a.	3.31	n.a.	n.a.	n.a.	11.4	n.a.	n.a.	n.a.	1.03	n.a.	193	n.a.	n.a.	n.a.
4/7/2012	1.76	n.a.	<0.40	n.a.	5.20	n.a.	129	n.a.	3.76	n.a.	n.a.	n.a.	9.77	n.a.	n.a.	n.a.	0.70	n.a.	195	n.a.	n.a.	n.a.
4/8/2012	1.47	n.a.	<0.40	n.a.	3.92	n.a.	106	n.a.	2.80	n.a.	n.a.	n.a.	7.92	n.a.	n.a.	n.a.	0.55	n.a.	169	n.a.	n.a.	n.a.
4/9/2012	1.70	n.a.	<0.40	n.a.	4.76	n.a.	131	n.a.	9.10	n.a.	n.a.	n.a.	14.6	n.a.	n.a.	n.a.	0.71	n.a.	189	n.a.	n.a.	n.a.
4/10/2012	1.87	n.a.	<0.40	n.a.	4.52	n.a.	130	n.a.	4.30	n.a.	n.a.	n.a.	9.97	n.a.	n.a.	n.a.	1.0	n.a.	178	n.a.	n.a.	n.a.
4/11/2012	1.77	n.a.	<0.40	n.a.	5.28	n.a.	121	n.a.	3.89	n.a.	n.a.	n.a.	11.4	n.a.	n.a.	n.a.	0.85	n.a.	198	n.a.	n.a.	n.a.
4/12/2012	2.73	n.a.	<0.40	n.a.	4.67	n.a.	116	n.a.	3.89	n.a.	n.a.	n.a.	11.1	n.a.	n.a.	n.a.	0.95	n.a.	184	n.a.	n.a.	n.a.
4/13/2012	2.27	n.a.	<0.40	n.a.	5.40	n.a.	119	n.a.	4.88	n.a.	n.a.	n.a.	11.9	n.a.	n.a.	n.a.	0.96	n.a.	195	n.a.	n.a.	n.a.
4/14/2012	2.36	n.a.	<0.40	n.a.	8.30	n.a.	112	n.a.	4.66	n.a.	n.a.	n.a.	11.5	n.a.	n.a.	n.a.	0.68	n.a.	180	n.a.	n.a.	n.a.
4/15/2012	1.87	n.a.	<0.40	n.a.	4.10	n.a.	106	n.a.	3.15	n.a.	n.a.	n.a.	9.12	n.a.	n.a.	n.a.	0.80	n.a.	169	n.a.	n.a.	n.a.
4/16/2012	1.77	n.a.	<0.40	n.a.	4.46	n.a.	114	n.a.	3.45	n.a.	n.a.	n.a.	12.8	n.a.	n.a.	n.a.	0.81	n.a.	173	n.a.	n.a.	n.a.
4/17/2012	1.85	n.a.	<0.40	n.a.	4.60	n.a.	177	n.a.	3.66	n.a.	n.a.	n.a.	10.9	n.a.	n.a.	n.a.	1.05	n.a.	182	n.a.	n.a.	n.a.
4/18/2012	1.79	n.a.	<0.40	n.a.	5.47	n.a.	121	n.a.	3.11	n.a.	n.a.	n.a.	13.6	n.a.	n.a.	n.a.	1.68	n.a.	177	n.a.	n.a.	n.a.
4/19/2012	1.87	n.a.	<0.40	n.a.	4.66	n.a.	133	n.a.	3.56	n.a.	n.a.	n.a.	14.9	n.a.	n.a.	n.a.	1.02	n.a.	186	n.a.	n.a.	n.a.
4/20/2012	1.89	n.a.	<0.40	n.a.	5.07	n.a.	118	n.a.	3.17	n.a.	n.a.	n.a.	12.0	n.a.	n.a.	n.a.	0.84	n.a.	171	n.a.	n.a.	n.a.
4/21/2012	1.98	n.a.	<0.40	n.a.	4.70	n.a.	143	n.a.	3.28	n.a.	n.a.	n.a.	10.2	n.a.	n.a.	n.a.	0.88	n.a.	196	n.a.	n.a.	n.a.
4/22/2012	1.61	n.a.	<0.40	n.a.	3.95	n.a.	105	n.a.	2.71	n.a.	n.a.	n.a.	8.21	n.a.	n.a.	n.a.	0.56	n.a.	166	n.a.	n.a.	n.a.
4/23/2012	1.79	n.a.	<0.40	n.a.	6.35	n.a.	114	n.a.	3.39	n.a.	n.a.	n.a.	9.16	n.a.	n.a.	n.a.	0.76	n.a.	170	n.a.	n.a.	n.a.
4/24/2012	1.88	n.a.	<0.40	n.a.	5.65	n.a.	134	n.a.	5.43	n.a.	n.a.	n.a.	13.1	n.a.	n.a.	n.a.	1.02	n.a.	191	n.a.	n.a.	n.a.
4/25/2012	1.81	n.a.	<0.40	n.a.	5.36	n.a.	127	n.a.	3.82	n.a.	n.a.	n.a.	11.7	n.a.	n.a.	n.a.	1.10	n.a.	180	n.a.	n.a.	n.a.
4/26/2012	1.98	n.a.	<0.40	n.a.	4.94	n.a.	118	n.a.	5.18	n.a.	n.a.	n.a.	10.3	n.a.	n.a.	n.a.	1.13	n.a.	208	n.a.	n.a.	n.a.
4/27/2012	1.73	n.a.	<0.40	n.a.	5.05	n.a.	109	n.a.	3.34	n.a.	n.a.	n.a.	12.2	n.a.	n.a.	n.a.	0.88	n.a.	164	n.a.	n.a.	n.a.
4/28/2012	1.89	n.a.	<0.40	n.a.	4.07	n.a.	108	n.a.	2.45	n.a.	n.a.	n.a.	8.76	n.a.	n.a.	n.a.	0.68	n.a.	160	n.a.	n.a.	n.a.
4/29/2012	1.72	n.a.	<0.40	n.a.	4.49	n.a.	108	n.a.	2.38	n.a.	n.a.	n.a.	8.47	n.a.	n.a.	n.a.	0.48	n.a.	177	n.a.	n.a.	n.a.
4/30/2012	1.66	n.a.	<0.40	n.a.	5.78	n.a.	107	n.a.	3.95	n.a.	n.a.	n.a.	9.27	n.a.	n.a.	n.a.	0.81	n.a.	177	n.a.	n.a.	n.a.
5/1/2012	1.80	0.78	<0.40	<0.10	6.42	0.53	128	3.65	3.60	0.15	0.173	0.00117	10.9	5.47	1.69	0.50	1.39	<0.10	193	20.1	<3.0	<3.0
6/1/2012	1.74	1.28	0.46	<0.10	5.96	<0.10	451	2.28	8.04	0.26	0.114	0.00127	12.0	5.74	2.48	0.49	1.46	<0.10	255	18.0	<3.0	<3.0

n.a. = not available

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

ESD Laboratory MDLs

Analyte	Method	MDL	Analyte	Method	MDL
		ug/L			ug/L
As(influent)	EPA 200.8	0.095	**Ni(influent)**	EPA 200.8	0.057
As(effluent)	EPA 200.8	0.095	**Ni(effluent)**	EPA 200.8	0.057
Cd(influent)	EPA 200.8	0.016	**Se(influent)**	EPA 200.9	0.0075
Cd(effluent)	EPA 200.8	0.016	**Se(effluent)**	EPA 200.9	0.0075
Cr(influent)	EPA 200.8	0.073	**Ag(influent)**	EPA 200.8	0.045
Cr(effluent)	EPA 200.8	0.073	**Ag(effluent)**	EPA 200.8	0.045
Cu(influent)	EPA 200.8	0.017	**Zn(influent)**	EPA 200.8	0.65
Cu(effluent)	EPA 200.8	0.017	**Zn(effluent)**	EPA 200.8	0.65
Pb(influent)	EPA 200.8	0.061	**Cyanide(influent)**	SM4500-CN E	0.4
Pb(effluent)	EPA 200.8	0.061	**Cyanide(effluent)**	SM4500-CN E	0.4
Hg(influent)	EPA 1631	0.000022			
Hg(effluent)	EPA 1631	0.000022	MDL = Method Detection Limit		

SAMPLE TYPE	DATE	METHOD	UNITS	Dichlorodifluoromethane	Chloroethane	Vinyl Chloride	1,1-Dichloroethene	Methylene Chloride	Trichlorofluoromethane	1,1-Dichloroethane	Trans-1,2-dichloroethene	Chloroform	1,2-Dichloroethane	1,1,1-Trichloroethane
Influent	3/1/2012	EPA 624	µg/L	<1.0	<1.0	<1.0	<1.0	**1.4**	<1.0	<1.0	<1.0	**3.3**	<1.0	<1.0
Effluent	3/1/2012	EPA 624	µg/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	**34.9**	<1.0	<1.0
Sludge	3/1/2012	EPA 8260B	µg/Kg	<5.0	<5.0	<5.0	<5.0	<20	<5.0	<2.0	<2.0	<2.0	<2.0	<2.0
Influent		EPA 624	µg/L											
Effluent		EPA 624	µg/L											
Sludge		EPA 8260B	µg/Kg											
CTR Limit			**ug/L**	**NA**	**NA**	**525**	**3.2**	**1600**	**NA**	**NA**	**140,000**	**470**	**99**	**NA**

SAMPLE TYPE	DATE	METHOD	UNITS	Phenol	Bis (2-Chloroethyl) Ether	2-Chlorophenol	1,3-Dichlorobenzene	1,4-Dichlorobenzene	1,2-Dichlorobenzene	Bis (2-Chloroisopropyl) Ether	N-Nitrosodi-n-Propylamine	Hexachloroethane	Isophorone	2-Nitrophenol
Influent	3/1/2012	EPA 625	µg/L	**9.47**	<1.1	<1.1	*	*	*	<1.1	<1.1	<1.1	<1.1	<1.1
Effluent	3/1/2012	EPA 625	µg/L	<1.1	<1.1	<1.1	*	*	*	<1.1	<1.1	<1.1	<1.1	<1.1
Sludge	3/1/2012	EPA8270C	mg/Kg	<6.6	<3.4	<6.6	<6.6	<6.6	<6.6	<6.6	<5.0	<6.6	<6.6	<6.6
Influent		EPA 625	µg/L											
Effluent		EPA 625	µg/L											
Sludge		EPA8270C	mg/kg											
CTR Limit			**µg/L**	**4,600,000**	**1.4**	**400**	**2,600**	**2,600**	**17,000**	**170,000**	**1.4**	**8.9**	**600**	**NA**

SAMPLE TYPE	DATE	Carbon Tetrachloride	2-Chloroethyl Vinyl Ether	1,2-Dichloropropane	Cis-1,3-dichloropropene	Trans-1,3-dichloropropene	Trichloroethene	Benzene	Toluene	1,1,2-Trichloroethane	1,1,2,2-Tetrachloroethane	Tetrachloroethene	Chlorobenzene	Ethylbenzene	Xylenes,Total
Influent	3/1/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	**4.2**	<1.0	<1.0	<1.0	<1.0	**1.0**	<3.2
Effluent	3/1/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<3.0
Sludge	3/1/2012	<5.0	<5.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<4.0
Influent															
Effluent															
Sludge															
CTR Limit		**4.4**	**NA**	**39**	**1,700**	**1,700**	**81**	**71**	**200,000**	**42**	**11**	**8.85**	**21,000**	**29,000**	**NA**

SAMPLE TYPE	DATE	2,4-Dimethylphenol	Bis (2-Chloroethoxy) Methane	2,4-Dichlorophenol	1,2,4-Trichlorobenzene	Naphthalene	Hexachlorobutadiene	4-Chloro-3-Methylphenol	2,4,6-Trichlorophenol	2-Chloronaphthalene	Acenaphthylene	Dimethylphthalate	2,6-Dinitrotoluene	Acenaphthene	2,4-Dinitrophenol
Influent	3/1/2012	<1.1	<1.1	<1.1	<1.1	<0.10	<1.1	<1.1	<1.1	<1.1	<0.10	<2.2	<1.1	<0.10	<5.5
Effluent	3/1/2012	<1.1	<1.1	<1.1	<1.1	<0.10	<1.1	<1.1	<1.1	<1.1	<0.10	<2.2	<1.1	<0.10	<5.5
Sludge	3/1/2012	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<13
Influent															
Effluent															
Sludge															
CTR Limit		**2,300**	**NA**	**790**	**NA**	**NA**	**50**	**NA**	**6.5**	**4,300**	**NA**	**2,900,000**	**NA**	**2,700**	**14,000**

SAMPLE TYPE	DATE	1,4-Dichlorobenzene	1,2-Dichlorobenzene	1,3-Dichlorobenzene	Bromomethane	Chloromethane	Bromodichloromethane	Dibromochloromethane	Bromoform
Influent	3/1/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Effluent	3/1/2012	<1.0	<1.0	<1.0	<1.0	<1.0	**20.2**	**13.9**	<1.0
Sludge	3/1/2012	<2.0	<2.0	<2.0	<5.0	<5.0	<2.0	<2.0	<5.0
Influent									
Effluent									
Sludge									
CTR Limit		**2,600**	**17,000**	**2,600**	**4,000**	**NA**	**46**	**34**	**360**

SAMPLE TYPE	DATE	4-Nitrophenol	2,4-Dinitrotoluene	Fluorene	Diethyl Phthalate	4-Chlorophenyl Phenyl Ether	4,6-Dinitro-2-Methylphenol	4-Bromophenyl Phenyl Ether	Hexachlorobenzene	Pentachlorophenol	Phenanthrene	Anthracene	Di-n-Butyl Phthalate	Fluoranthene	Pyrene
Influent	3/1/2012	<5.5	<5.5	<0.10	<2.2	<1.1	<5.5	<1.1	<1.1	<5.5	<0.10	<0.10	<5.5	<0.10	<0.10
Effluent	3/1/2012	<5.5	<5.5	<0.10	<2.2	<1.1	<5.5	<1.1	<1.1	<5.5	<0.10	<0.10	<5.5	<0.10	<0.10
Sludge	3/1/2012	<17	<6.6	<6.6	<6.6	<6.6	<8.4	<6.6	<6.6	<17	<6.6	<6.6	<6.6	<6.6	<6.6
Influent															
Effluent															
Sludge															
CTR Limit		**NA**	**9.1**	**14,000**	**120,000**	**NA**	**765**	**NA**	**0.00077**	**8.2**	**NA**	**110,000**	**12,000**	**370**	**11,000**

SAMPLE TYPE	DATE	Butyl Benzyl Phthalate	Benzo[a]anthracene	Hexachlorocyclopentadiene	Chrysene	Bis(2-Ethylhexyl)Phthalate	Di-n-Octyl Phthalate	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene	Dibenz[a,h]anthrecene	Benzo[ghi]perylene
Influent	3/1/2012	<5.5	<0.10	<5.5	<0.10	**20**	<5.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
Effluent	3/1/2012	<5.5	<0.10	<5.5	<0.10	<5.5	<5.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
Sludge	3/1/2012	<6.6	<6.6	<17	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<6.6	<8.4	<6.6
Influent													
Effluent													
Sludge													
CTR Limit		**5,200**	**0.049**	**17000**	**0.049**	**5.9**	**NA**	**0.049**	**0.049**	**0.049**	**0.049**	**0.049**	**NA**

RAW DATA

[available upon request]

Semi-Annual Industrial User Violation Report

San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Advanced Metal Finishers, LLC 1291 Oakland Rd San Jose, CA 95112 SJ-606B **Flow =** 146 (on 11/22/11) 40 CFR 433.17 Subpart A	SNF/ SNL	IF/ IL	IF/ IL	NS	11/22/2011	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 negligence on the part of the IU. The IU responded to the violation by collecting samples on 2/3/2012 and establishing protocols for sample collection and analysis, as verified during an inspection on 1/24/2012.
					1/24/2012	OTHER						WN	The violation was for failing to comply with a permit condition – failure to maintain paper in pH chart recorder. The cause of the violation was determined to be negligence. The IU responded to the violation by installing paper, as verified during an inspection on 3/23/2012.

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
* - 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 Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
Advanced Metal Finishers, LLC 1291 Oakland Rd San Jose, CA 95112 SJ-606B **Flow =** 146 (on 11/22/11) 40 CFR 433.17 Subpart A	SNF/ SNL	IF/ IL	IF/ IL	NS	2/17/2012	OTHER	pH	4.8 (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 85 minute pH violation was identified during an inspection on 2/29/2012. The IU failed to report the pH violation within 24 hours. The cause of the violation was determined to be pH chart recorder malfunction. The IU responded to the violation by servicing the unit, as verified during an inspection on 3/23/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 5/30/2012 were in compliance. The IU failed to collect subsequent samples or respond to the violation in writing, resulting in additional enforcement actions. AC $500 fine issued for Corrosive Matter per San Jose Municipal Code 15.14.575.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Advanced Metal Finishers, LLC 1291 Oakland Rd San Jose, CA 95112 SJ-606B **Flow =** 146 (on 11/22/11) 40 CFR 433.17 Subpart A	SNF/ SNL	IF/ IL	IF/ IL	NS	2/29/2012	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 85 minute pH violation was identified during an inspection on 2/29/2012. The IU failed to report the pH violation within 24 hours. The cause of the violation was determined to be pH chart recorder malfunction. The IU responded to the violation by servicing the unit, as verified during an inspection on 3/23/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 5/30/2012 were in compliance. The IU failed to collect subsequent samples or respond to the violation in writing, resulting in additional enforcement actions.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Advanced Metal Finishers, LLC 1291 Oakland Rd San Jose, CA 95112 SJ-606B **Flow =** 146 (on 11/22/11) 40 CFR 433.17 Subpart A	SNF/ SNL	IF/ IL	IF/ IL	NS	4/14/2012	OTHER						NV AC	The violation was for failure to submit an enforcement action response that was due on 4/13/2012. A Compliance Meeting will be held to discuss this violation. $500 fine issued for failure to submit a report requested by City in response to enforcement actions per San Jose Municipal Code 15.14.695.
Advanced Surface Finishing Inc. 1181 N 4th St, Suite 50 San Jose, CA 95112 SJ-514B **Flow =** 361 40 CFR 433.17 Subpart A	CC	IF/ IL	SNL	SNF/ SNL	4/1/2012	OTHER						WN	The violation was for failing to comply with permit condition - sampling within the 10/1/2011 to 3/31/2012 reporting period. The cause of the violation was determined to be an oversight by the IU. The IU responded to the violation by collecting compliance samples on 4/2/2012.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Applied Materials, Bldgs. 2 & 3 3300 Scott Blvd Santa Clara, CA 95054 SC-092A **Flow =** 49,307 40 CFR 433.17 Subpart A	CC	IL	NS	CC	1/24/2012	IU	CN-T	1.7		0.5		WN	The violation was for exceeding the local maximum allowable cyanide concentration limit. The cause of the violation was determined to be wastewater generated at the point-of-use (POU) abatement units of the Neon tools. The IU responded to the violation by installing a cyanide treatment system. An inspection on 5/22/2012 verified the IU had installed the cyanide treatment system. The results of subsequent samples collected by the IU on 3/15/2012, 3/20/2012, 3/23/2012, 4/23/2012, and 5/21/2012 and collected by the City on 3/22/2012, 3/29/2012, and 4/20/2012 were in compliance. See 3/2/2012 Compliance Meeting for additional details.

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Semi-Annual Industrial User Violation Report

San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Applied Materials, Bldgs. 2 & 3 3300 Scott Blvd Santa Clara, CA 95054 SC-092A **Flow =** 49,307 40 CFR 433.17 Subpart A	CC	IL	NS	CC	2/8/2012	IU	CN-T	2.05		0.5		NV	The violation was for exceeding the local maximum allowable cyanide concentration limit. The cause of the violation was determined to be wastewater generated at the point-of-use (POU) abatement units of the Neon tools. The IU responded to the violation by installing a cyanide treatment system. An inspection on 5/22/2012 verified the installation of cyanide treatment system. The results of subsequent samples collected by the IU on 3/15/2012, 3/20/2012, 3/23/2012, 4/23/2012 and 5/21/2012 and collected by the City on 3/22/2012, 3/29/2012 and 4/1/2012 were in compliance. See 3/2/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
												CM	At a Compliance Meeting on 3/2/2012 the violations and a Compliance Agreement were discussed. The IU responded to the violation by installing a cyanide treatment system and collecting samples for 3 months - March 2012, April 2012, and May 2012. In addition to these requirements, the IU attended the City's 2012 IU Academy. An inspection on 5/22/2012 verified the installation of the cyanide treatment system at the treatment pad. The results of subsequent samples collected by the IU on 3/15/2012, 3/20/2012, 3/23/2012, 4/23/2012, and 5/21/2012 and collected by the City on 3/22/2012, 3/29/2012, and 4/1/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Arnold's Metal Finishing 805 Aldo Ave, Unit 104 Santa Clara, CA 95054 SC-369B **Flow =** 1,762 40 CFR 433.17 Subpart A	CC	IL	CC	IL	1/21/2012	OTHER	pH	14			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of two pH violations with durations of 44 hours and 45 minutes were identified during an inspection on 3/28/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. The IU responded to the violations by performing equipment maintenance, as verified during an inspection on 6/11/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 5/2/2012 and collected by the City on 5/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Arnold's Metal Finishing 805 Aldo Ave, Unit 104 Santa Clara, CA 95054 SC-369B **Flow =** 1,762 40 CFR 433.17 Subpart A	CC	IL	CC	IL	1/28/2012	OTHER	pH	14			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of two pH violations with durations of 44 hours and 45 minutes were identified during an inspection on 3/28/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. The IU responded to the violations by performing equipment maintenance, as verified during an inspection on 6/11/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 5/2/2012 and collected by the City on 5/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Arnold's Metal Finishing 805 Aldo Ave, Unit 104 Santa Clara, CA 95054 SC-369B **Flow =** 1,762 40 CFR 433.17 Subpart A	CC	IL	CC	IL	3/28/2012	OTHER						NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of two pH violations with durations of 44 hours and 45 minutes were identified during an inspection on 3/28/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. The IU responded to the violations by performing equipment maintenance, as verified during an inspection on 6/11/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 5/2/2012 and collected by the City on 5/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Averatek Corp. 550 Nuttman St Santa Clara, CA 95054 SC-406B **Flow =** 47 40 CFR 433.17 Subpart A	IF/ IL	NS	CC	CC	4/25/2012	IU	CN-T	1.0		0.5		WN	The violations were for exceeding the federal monthly average and the local maximum allowable total cyanide concentration limits, and failure to report violations. The federal monthly average concentration limit violation was an average of one sample. The violations were identified during a review of the IU's 5/31/2012 SMR. The IU failed to report the total cyanide violations within 24 hours. The cause of the violations could not be determined. The IU responded to the violations by purchasing cyanide testing equipment and supplies to monitor cyanide concentrations. An inspection on 7/16/2012 verified the IU had implemented in-house monitoring for cyanide. The results of subsequent samples collected by the City on 6/1/2012 and collected by the IU on 6/21/2012 and 6/25/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Averatek Corp. 550 Nuttman St Santa Clara, CA 95054 SC-406B **Flow =** 47 40 CFR 433.17 Subpart A	IF/ IL	NS	CC	CC	4/30/2012	OTHER	CN-T	1.00		0.65				WN	The violations were for exceeding the federal monthly average and the local maximum allowable total cyanide concentration limits, and failure to report violations. The federal monthly average concentration limit violation was an average of one sample. The violations were identified during a review of the IU's 5/31/2012 SMR. The IU failed to report the total cyanide violations within 24 hours. The cause of the violations could not be determined. The IU responded to the violations by purchasing cyanide testing equipment and supplies to monitor cyanide concentrations. An inspection on 7/16/2012 verified the IU had implemented in-house monitoring for cyanide. The results of subsequent samples collected by the City on 6/1/2012 and collected by the IU on 6/21/2012 and 6/25/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Averatek Corp. 550 Nuttman St Santa Clara, CA 95054 SC-406B **Flow =** 47 40 CFR 433.17 Subpart A	IF/ IL	NS	CC	CC	5/31/2012	OTHER						WN	The violations were for exceeding the federal monthly average and the local maximum allowable total cyanide concentration limits, and failure to report violations. The federal monthly average concentration limit violation was an average of one sample. The violations were identified during a review of the IU's 5/31/2012 SMR. The IU failed to report the total cyanide violations within 24 hours. The cause of the violations could not be determined. The IU responded to the violations by purchasing cyanide testing equipment and supplies to monitor cyanide concentrations. An inspection on 7/16/2012 verified the IU had implemented in-house monitoring for cyanide. The results of subsequent samples collected by the City on 6/1/2012 and collected by the IU on 6/21/2012 and 6/25/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	1/18/2012	POTW	Cu	3.84		3.38	2.7	NV	The violations were 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 two samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by implementing improved water usage practices. The results of subsequent samples collected by the IU on 3/13/2012 and 3/23/2012 were in compliance. The results of subsequent samples collected by the City on 3/15/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	1/31/2012	OTHER	Cu	2.35		2.07				NV	The violations were 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 two samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by implementing improved water usage practices. The results of subsequent samples collected by the IU on 3/13/2012 and 3/23/2012 were in compliance. The results of subsequent samples collected by the City on 3/15/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	2/10/2012	POTW	Cu	5.20		3.38	2.7	NV	The violations were 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 two samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage and increasing sludge removal from clarifier. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 3/13/2012 and 3/23/2012 were in compliance. The results of subsequent samples collected by the City on 3/15/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	2/29/2012	OTHER						VW	The violation was for late submittal of a Compliance Agreement action item that was due on 2/29/2012, but was not received until 3/6/2012. The IU has committed to timely submittal of reports in the future.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	2/29/2012	OTHER	Cu	3.48		2.07				NV	The violations were 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 two samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage and increasing sludge removal from clarifier. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 3/13/2012 and 3/23/2012 were in compliance. The results of subsequent samples collected by the City on 3/15/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	3/15/2012	POTW	Cu	6.11		3.38	2.7	NV	The violations were for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper and lead concentration limits. The federal monthly average concentration limit violation was an average of three samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage, increasing sludge removal from clarifier and switching to waste hauling for their lead waste stream. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 4/18/2012 were in compliance. The results of subsequent samples collected by the City on 4/24/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	3/15/2012	POTW	Pb	1.82		0.69		0.4		NV	The violations were for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper and lead concentration limits. The federal monthly average concentration limit violation was an average of three samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage, increasing sludge removal from clarifier and switching to waste hauling for their lead waste stream. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 4/18/2012 were in compliance. The results of subsequent samples collected by the City on 4/24/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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Semi-Annual Industrial User Violation Report

San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	3/31/2012	OTHER	Cu	2.70		2.07				NV	The violations were for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper and lead concentration limits. The federal monthly average concentration limit violation was an average of three samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage, increasing sludge removal from clarifier and switching to waste hauling for their lead waste stream. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 4/18/2012 were in compliance. The results of subsequent samples collected by the City on 4/24/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	3/31/2012	OTHER	Pb	0.70		0.43				NV	The violations were for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable copper and lead concentration limits. The federal monthly average concentration limit violation was an average of three samples. The cause of the violations was determined to be excessive flow through treatment system. The IU responded to the violations by decreasing water usage, increasing sludge removal from clarifier and switching to waste hauling for their lead waste stream. An inspection on 4/24/2012 verified flow reduction changes. The results of subsequent samples collected by the IU on 4/18/2012 were in compliance. The results of subsequent samples collected by the City on 4/24/2012 were not in compliance, resulting in additional enforcement actions. See 4/12/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
												CM	At a second Compliance Meeting on 4/12/2012, the violations and Compliance Agreement were discussed. The IU responded to the violations by implementing offsite disposal of lead and silver waste, reducing water usage, increasing sludge removal, and collecting samples for 3 months – April 2012, May 2012, and June 2012. In addition to these requirements, the IU was required to submit a plan to prevent violations until treatment system changes and upgrades were implemented, including the above measures. An inspection on 4/24/2012 verified flow reduction, waste hauling, and sludge removal practices. The results of subsequent samples collected by the IU on 4/18/2012, 5/17/2012, and 6/14/2012 and by the City on 6/8/2012 were in compliance. The results of subsequent samples collected by the City on 4/24/2012 were not in compliance, resulting in additional enforcement actions.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
CBR Circuits 116 Minnis Cir Milpitas, CA 95035 MI-013B **Flow =** 1,610 (on 09/13/11) 40 CFR 433.17 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	4/24/2012	POTW	Cu	3.8		3.38		2.7		REF	The violations were 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 two samples. The IU was referred to the City of Milpitas for enforcement.
					4/30/2012	OTHER	Cu	2.90		2.07				REF	The violations were 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 two samples. The IU was referred to the City of Milpitas for enforcement.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	10/4/2011	OTHER	pH	13.4		12.5		NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	10/5/2011	OTHER	pH	12.8			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	10/7/2011	OTHER	pH	12.6			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	10/11/2011	OTHER	pH	13.2			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	10/12/2011	OTHER	pH	12.8			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/7/2011	OTHER	pH	12.6			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/9/2011	OTHER	pH	12.6			12.5	NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/13/2011	OTHER	pH	12.8			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/14/2011	OTHER	pH	12.8			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/22/2011	OTHER	pH	12.8			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/29/2011	OTHER	pH	13.6			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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Semi-Annual Industrial User Violation Report

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	12/30/2011	OTHER	pH	12.8			12,5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	1/21/2012	OTHER	pH	12.6			12.5			NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cirexx International, Inc 3391 Keller St Santa Clara, CA 95054 SC-428B **Flow =** 29,269 40 CFR 433.17 Subpart A	CC	CC	IL	CC	2/15/2012	OTHER						NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, and failure to report violations. A total of 13 pH violations with durations of 45, 15, 30, 90, 20, 30, 40, 75, 30, five, 30, 45, and 45 minutes were identified during an inspection on 2/15/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be equipment malfunction. An inspection on 5/1/2012 verified the IU performed the required equipment maintenance. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/8/2012 and collected by the IU on 3/28/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Coatek 2272 Calle de Luna Santa Clara, CA 95054 SC-026B **Flow =** 1,553 40 CFR 433.17 Subpart A	CC	SNL	CC	CC	3/22/2012	POTW	Ni	1.42		0.5				WN	The violation was for exceeding the local maximum allowable nickel concentration limit. The cause of the violation was determined to be accidental introduction of incompatible wastewater into wastewater treatment system by a maintenance employee. The IU responded to the violation by providing training to maintenance staff. An inspection on 6/14/2012 verified the treatment system was cleaned, checked and maintained and training to staff was provided. The results of subsequent samples collected by the IU on 5/8/2012 and collected by the City on 5/31/2012 were in compliance.
Coherent, Inc. 5100 Patrick Henry Dr Santa Clara, CA 95054 SC-173B **Flow =** 13,944 40 CFR 433.17 Subpart A	IF/ IL	CC	CC	CC	5/1/2012	OTHER								WN	The violation was for failing to comply with a permit condition – sampling within the 11/1/2011 - 4/30/2012 reporting period. The cause of the violation was determined to be a misunderstanding of conditions of newly issued permit. The IU responded to the violation by collecting compliance samples on 5/3/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Avg / Local Avg	Federal Max / Federal Avg	Local Max / Local Avg		
Cordova Printed Circuits 1648 Watson Ct Milpitas, CA 95035 MI-017B **Flow =** 3,004 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	IF/ IL	4/1/2011	OTHER						WN	The violation was for failing to comply with a permit condition – semiannual sampling of total cyanide from the federal sample point. The cause of the violation was determined to be insufficient volume of wastewater in the sample point. The IU responded to the violation by sampling for total cyanide from the federal sample point on 2/1/2012.
					10/1/2011	OTHER						WN	The violation was for failing to comply with a permit condition – semiannual sampling of total cyanide from the federal sample point. The cause of the violation was determined to be insufficient volume of wastewater in the sample point. The IU responded to the violation by sampling for total cyanide from the federal sample point on 2/1/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Cordova Printed Circuits 1648 Watson Ct Milpitas, CA 95035 MI-017B **Flow =** 3,004 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	IF/ IL	4/1/2012	OTHER						NV	The violation was for failing to comply with a permit condition – semiannual sampling of total cyanide from the sample point. The cause of the violation was determined to be negligence by IU. The IU responded to the violation by sampling for total cyanide from the sample point on 5/15/2012.
					5/15/2012	OTHER						WN	The violation was for late submittal of an SMR that was due on 3/31/2012 but was not received until 5/15/2012. The IU has committed to timely submittal of reports in the future.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
EPZ, Inc. 3005 Copper Rd Santa Clara, CA 95051 SC-328B **Flow =** 3,850 40 CFR 433.17 Subpart A	CC	CC	IL	CC	1/17/2012	OTHER						VW	The violation was for late submittal of an SMR that was due on 12/31/2011 but was not received until 1/17/2012. The IU has committed to timely submittal of reports in the future.
Gordon Biersch Brewing Company, Inc. 357 E Taylor St San Jose, CA 95112-3105 SJ-352C **Flow =** 32,867 SIU based on flow	CC	CC	CC	CC	6/20/2012	POTW	pH	5.7 (min)			6.0 (min)	VW	The violation was for failing to meet the local pH limit. The cause of the violation was determined to be failure of one of the caustic metering pumps. The IU responded to the violation by replacing the pump. An inspection on 7/9/2012 verified that the pretreatment system was operating normally. The results of subsequent samples collected by the IU on 6/29/2012 and collected by the City on 6/27/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Intricast Co., Inc. 2160 Walsh Ave Santa Clara, CA 95050 SC-439B **Flow =** 1,427 40 CFR 464 Subpart C 40 CFR 464 Subpart A 40 CFR 464	NS	NS	NS	NS	12/9/2011	OTHER						NV	The violation was for discharging without a valid Industrial Wastewater Discharge Permit. During inspections on 12/9/2012 and 12/15/2012, the facility was observed to be discharging wastewater from the investment casting process to sanitary sewer. The facility submitted an Industrial Wastewater Discharge Permit application on 2/23/2012. Based on a review of the Industrial Wastewater Discharge Permit application, it was confirmed the facility was discharging wastewater from a categorical process. The City is currently processing an Industrial Wastewater Discharge Permit for this facility.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
KLA-Tencor Corporation 5 Technology Dr Milpitas, CA 95035 MI-137B **Flow =** 349 40 CFR 433 Subpart A	IF/ IL	IF/ IL	UN	UN	2/15/2012	OTHER						NV	The violation was for discharging without a valid Industrial Wastewater Discharge Permit. During an inspection on 2/15/2012, the facility was observed to be discharging wastewater from the wafer grinding process to sanitary sewer. The facility responded to the violation by submitting an Industrial Wastewater Discharge Permit application on 3/22/2012. The facility was issued Industrial Wastewater Discharge Permit MI-137B on 5/11/2012.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max Fed Avg Local Avg	Federal Max	Federal Avg	Local Max	Local Avg
KLA-Tencor Corporation 5 Technology Dr Milpitas, CA 95035 MI-137B **Flow =** 349 40 CFR 433 Subpart A	IF/ IL	IF/ IL	UN	UN	4/4/2012	OTHER	pH	3.12 (min)	5.0 (min)		6.0 (min)	WN	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. A total of two pH violations with durations of one minute each were identified during an inspection on 6/8/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be an improperly located pH probe. The IU will respond to the violations by moving the pH probe to the sample point by 7/31/2012. During an inspection on 7/18/2012, the pH chart recorder was reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 7/18/2012 and the City on 7/20/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
KLA-Tencor Corporation 5 Technology Dr Milpitas, CA 95035 MI-137B **Flow =** 349 40 CFR 433 Subpart A	IF/ IL	IF/ IL	UN	UN	6/4/2012	OTHER	pH	5.43 (min)				6.0 (min)		WN	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. A total of two pH violations with durations of one minute each were identified during an inspection on 6/8/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be an improperly located pH probe. The IU will respond to the violations by moving the pH probe to the sample point by 7/31/2012. During an inspection on 7/18/2012, the pH chart recorder was reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 7/18/2012 and the City on 7/20/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
KLA-Tencor Corporation 5 Technology Dr Milpitas, CA 95035 MI-137B **Flow =** 349 40 CFR 433 Subpart A	IF/ IL	IF/ IL	UN	UN	6/8/2012	OTHER						WN	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. A total of two pH violations with durations of one minute each were identified during an inspection on 6/8/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be an improperly located pH probe. The IU will respond to the violations by moving the pH probe to the sample point by 7/31/2012. During an inspection on 7/18/2012, the pH chart recorder was reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 7/18/2012 and the City on 7/20/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Avg / Local Avg	Federal Max / Avg	Local Max / Avg		
Miasole 2590 Walsh Ave Santa Clara, CA 95051 SC-391B **Flow =** 2,094 40 CFR 433.17 Subpart A	IF/ IL	IL	IF/ IL	CC	3/13/2012	OTHER	pH	5.5 (min)			6.0 (min)	WN	The violation was for failing to meet the local pH limit, as noted on the IU's pH chart recorder. The 3.5 hour pH violation was reported by the IU on 3/13/2012. The cause of the violation was determined to be recent changes in discharge flow stream. The IU responded to the violation by implementing a two stage remediation plan, as verified during an inspection on 3/20/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 3/20/2012 and collected by the IU on 3/27/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max Fed Avg Local Avg	Federal Max	Federal Avg Local Max Avg		
Miasole 2590 Walsh Ave Santa Clara, CA 95051 SC-391B **Flow =** 2,094 40 CFR 433.17 Subpart A	IF/ IL	IL	IF/ IL	CC	4/25/2012	OTHER	pH	3.4 (min)	5.0 (min)	6.0 (min)	WN	The violation was for failing to meet the federal and local pH limit, as noted on the IU's pH chart recorder. The 22 minute pH violation was reported by the IU on 4/25/2012. The cause of the violations could not be determined. The IU responded to the violations by immediately calibrating the pH meter, implementing more stringent operating procedures, and installing a new wastewater pH neutralization treatment system due for completion on 7/15/2012, as verified during an inspection on 4/27/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 5/23/2012 and collected by the City on 6/1/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
M-Pulse Microwave, Inc. 576 Charcot Ave San Jose, CA 95131-2201 SJ-035B **Flow =** 316 40 CFR 469 Subpart A	CC	CC	IL	CC	4/26/2012	IU	TTO-F	1.50		1.37				WN	The violations were for exceeding the federal daily maximum allowable Total Toxic Organic (TTO) concentration limit, and failure to report the violation. The violation was identified during a review of the IU's 5/31/2012 SMR. The IU failed to report the TTO violation within 24 hours. The cause of the violation was determined to be improper rinsing techniques. The IU responded to the violation by adding a methanol rinse to the process line. An inspection on 6/20/2012 verified the additional rinsing step was in place. The results of subsequent samples collected by the City on 6/19/2012 and collected by the IU on 6/21/2012 were in compliance.

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Semi-Annual Industrial User Violation Report

San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
M-Pulse Microwave, Inc. 576 Charcot Ave San Jose, CA 95131-2201 SJ-035B **Flow =** 316 40 CFR 469 Subpart A	CC	CC	IL	CC	5/31/2012	OTHER						WN	The violations were for exceeding the federal daily maximum allowable Total Toxic Organic (TTO) concentration limit, and failure to report the violation. The violation was identified during a review of the IU's 5/31/2012 SMR. The IU failed to report the TTO violation within 24 hours. The cause of the violation was determined to be improper rinsing techniques. The IU responded to the violation by adding a methanol rinse to the process line. An inspection on 6/20/2012 verified the additional rinsing step was in place. The results of subsequent samples collected by the City on 6/19/2012 and collected by the IU on 6/21/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Pac Tech USA Packaging 328 Martin Ave Santa Clara, CA 95050 SC-343B **Flow =** 5,320 40 CFR 433.17 Subpart A	SNF/ SNL	CC	IF/ IL	CC	5/3/2012	IU	Ni	5.5		3.98		0.5		NV	The violation was for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable nickel concentration limit. The federal monthly average concentration limit violation was an average of one sample. The violation was reported by the IU on 5/22/2012. The cause of the violation was determined to be depleted ion exchange bottles. The IU responded to the violation by immediately replacing the ion exchange bottles and resampling on 5/25/2012 to confirm compliance. An inspection on 6/21/2012 verified the new ion exchange bottles had been installed. The results of subsequent samples collected by the City on 6/15/2012 were in compliance. The IU is required to collect subsequent samples by 7/16/2012. A Compliance Meeting will be held to discuss this violation.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Pac Tech USA Packaging 328 Martin Ave Santa Clara, CA 95050 SC-343B **Flow =** 5,320 40 CFR 433.17 Subpart A	SNF/ SNL	CC	IF/ IL	CC	5/31/2012	OTHER	Ni	2.76		2.38				NV	The violation was for exceeding the federal monthly average, the federal daily maximum, and the local maximum allowable nickel concentration limit. The federal monthly average concentration limit violation was an average of one sample. The violation was reported by the IU on 5/22/2012. The cause of the violation was determined to be depleted ion exchange bottles. The IU responded to the violation by immediately replacing the ion exchange bottles and resampling on 5/25/2012 to confirm compliance. An inspection on 6/21/2012 verified the new ion exchange bottles had been installed. The results of subsequent samples collected by the City on 6/15/2012 were in compliance. The IU is required to collect subsequent samples by 7/16/2012. A Compliance Meeting will be held to discuss this violation.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
PK Selective Metal Plating, Inc. 415 Mathew St Santa Clara, CA 95050 SC-013B **Flow =** 176 40 CFR 433.17 Subpart A	CC	CC	CC	CC	10/5/2011	OTHER	pH	3.0 (min)	5.0 (min)	6.0 (min)	WN	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 five minute pH violations were identified during an inspection on 11/23/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be failure to document a calibration of the pH recorder. The IU responded to the violations by retraining staff as verified during an inspection on 5/3/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 12/6/2011 and collected by the City on 2/24/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
PK Selective Metal Plating, Inc. 415 Mathew St Santa Clara, CA 95050 SC-013B **Flow =** 176 40 CFR 433.17 Subpart A	CC	CC	CC	CC	11/23/2011	OTHER						WN	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 five minute pH violations were identified during an inspection on 11/23/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be failure to document a calibration of the pH recorder. The IU responded to the violations by retraining staff as verified during an inspection on 5/3/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 12/6/2011 and collected by the City on 2/24/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
QuantumClean 1710 Ringwood Dr San Jose, CA 95131-1711 SJ-545B **Flow =** 478 40 CFR 433.17 Subpart A	CC	IL	CC	CC	2/29/2012	OTHER						NV AC	The violation was for late submittal of an SMR that was due on 1/31/2012 but was not received until 2/29/2012. The IU has committed to timely submittal of reports in the future. $250 fine issued for Discharge Reports - Late Reporting per San Jose Municipal Code 15.14.695.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant I 2101 O'Toole Ave San Jose, CA 95131 SJ-022A **Flow =** 20,736 40 CFR 433.17 Subpart A	CC	CC	CC	CC	5/10/2011	OTHER	pH	5.2 (min)				6.0 (min)		WN	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. A total of two pH violations with durations of 15 and five minutes were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be mechanical and electrical problems with the pH recorder. The IU responded to the violation by training their operators to report problems with the recorder and conduct more frequent visual inspections of the recorder, as verified during inspections on 3/27/2012 and 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/19/2012 and 4/20/2012 and collected by the IU on 3/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
Sanmina Corp Plant I 2101 O'Toole Ave San Jose, CA 95131 SJ-022A **Flow =** 20,736 40 CFR 433.17 Subpart A	CC	CC	CC	CC	9/16/2011	OTHER	pH	4.4 (min)	5.0 (min)	6.0 (min)	WN	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. A total of two pH violations with durations of 15 and five minutes were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be mechanical and electrical problems with the pH recorder. The IU responded to the violation by training their operators to report problems with the recorder and conduct more frequent visual inspections of the recorder, as verified during inspections on 3/27/2012 and 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/19/2012 and 4/20/2012 and collected by the IU on 3/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant I 2101 O'Toole Ave San Jose, CA 95131 SJ-022A **Flow =** 20,736 40 CFR 433.17 Subpart A	CC	CC	CC	CC	11/22/2011	OTHER						WN	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. A total of two pH violations with durations of 15 and five minutes were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be mechanical and electrical problems with the pH recorder. The IU responded to the violation by training their operators to report problems with the recorder and conduct more frequent visual inspections of the recorder, as verified during inspections on 3/27/2012 and 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/19/2012 and 4/20/2012 and collected by the IU on 3/31/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	1/28/2011	OTHER	pH	12.8		12.5		WN	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. A total of two pH violations with durations of five minutes each were identified during an inspection on 12/12/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be operator error during periodic calibrations. The IU responded to the violation by retraining staff, as verified during an inspection on 6/20/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 4/30/2012 and collected by the City on 1/10/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	5/27/2011	OTHER	pH	1.4 (min)	5.0 (min)	6.0 (min)	WN	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. A total of two pH violations with durations of five minutes each were identified during an inspection on 12/12/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be operator error during periodic calibrations. The IU responded to the violation by retraining staff, as verified during an inspection on 6/20/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 4/30/2012 and collected by the City on 1/10/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	6/8/2011	POTW	Cu	7.79				2.3		REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 6/1/2011 to 6/8/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					6/8/2011	POTW	Ni	0.70				0.5		REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 6/1/2011 to 6/8/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/1/2011	POTW	Cu	3.90			2.3	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 6/27/2011 to 7/1/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/1/2011	POTW	Ni	1.0			0.5	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 6/27/2011 to 7/1/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/6/2011	POTW	Ni	1.37			0.5			REF	The nickel maximum allowable concentration limit violation resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 7/1/2011 to 7/6/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/14/2011	POTW	Cu	10.2			2.3			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 12:00 AM on 7/14/2011 to 10:45 PM on 7/14/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/14/2011	OTHER	Ni	3.02			0.5	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 12:00 AM on 7/14/2011 to 10:45 PM on 7/14/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/15/2011	POTW	Cu	6.42			2.3	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/15/2011 to 8:47 AM on 7/16/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/16/2011	POTW	Cu	4.47			2.3			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/15/2011 to 8:47 AM on 7/16/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/16/2011	POTW	Ni	2.09			0.5			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/15/2011 to 8:47 AM on 7/16/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/18/2011	POTW	Cu	10.9			2.3	REF	The copper maximum allowable concentration limit violation resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 11:00 AM on 7/18/2011 to 9:47 AM on 7/19/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/19/2011	POTW	Cu	2.88			2.3	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 11:00 AM on 7/18/2011 to 9:47 AM on 7/19/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/19/2011	POTW	Ni	0.60			0.5			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 11:00 AM on 7/18/2011 to 9:47 AM on 7/19/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/22/2011	POTW	Cu	4.36			2.3			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/22/2011 to 8:47 AM on 7/23/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/22/2011	POTW	Ni	2.57			0.5			REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/22/2011 to 8:47 AM on 7/23/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/23/2011	POTW	Ni	0.64			0.5			REF	The nickel maximum allowable concentration limit violation resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 10:00 AM on 7/22/2011 to 8:47 AM on 7/23/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/26/2011	POTW	Cu	15.4			2.3	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 9:00 AM on 7/26/2011 to 7:47 AM on 7/27/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.
					7/26/2011	POTW	Ni	1.07			0.5	REF	The copper and nickel maximum allowable concentration limit violations resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 9:00 AM on 7/26/2011 to 7:47 AM on 7/27/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	7/27/2011	POTW	Cu	2.84		2.3		REF	The copper maximum allowable concentration limit violation resulted from surveillance monitoring sampling in a manhole directly downstream of the facility. Since samples were collected in the manhole, only local limits apply. The samples were collected from 9:00 AM on 7/26/2011 to 7:47 AM on 7/27/2011. This case was referred to the City Attorney's Office for enforcement. A Settlement Agreement was signed by the IU and City on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Avg / Local Avg	Federal Max / Federal Avg	Local Max / Local Avg		
Sanmina Corp Plant II 2068 Bering Dr San Jose, CA 95131-2009 SJ-043A **Flow =** 194,813 40 CFR 433.17 Subpart A	CC	CC	CC	SNL	12/12/2011	OTHER						WN	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. A total of two pH violations with durations of five minutes each were identified during an inspection on 12/12/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be operator error during periodic calibrations. The IU responded to the violation by retraining staff, as verified during an inspection on 6/20/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the IU on 4/30/2012 and collected by the City on 1/10/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Silicon Microstructures 1701 McCarthy Blvd Milpitas, CA 95035 MI-108B **Flow =** 3,863 40 CFR 469 Subpart A	IF/ IL	CC	IF/ IL	CC	5/21/2012	OTHER						NV CM	The violation was for late submittal of letter that was due on 5/16/2012. See 6/21/2012 Compliance Meeting for additional details. At a Compliance Meeting on 6/21/2012, the violation and Compliance Agreement were discussed. The IU responded to the violation by submitting the the letter that was due on 5/16/2012 on 6/29/2012. In addition to these requirements, the IU was required to designate an environmental contact responsible for timely notification of violations and submittal of required documents and information to the City. The IU also committed to timely submittal of reports in the future.
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	10/1/2011	OTHER						NV	The violation was for failing to submit an SMR that was due on 9/30/2011 and for failing to comply with a permit condition – collecting samples within the 4/1/2011 to 9/30/2012 reporting period. The cause of the violation was determined to be negligence on the part of the IU. This case has been referred to the City Attorney's Office for enforcement. See 7/11/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	1/31/2012	OTHER	pH	5.2 (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 violations. The ten minute pH violations were identified during an inspection on 3/29/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be failure to properly rinse containers. The IU responded to the violations by having additional staff rinse these containers and adding additional oversight into their process, as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 4/20/2012 and collected by the IU on 5/14/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	2/27/2012	OTHER	pH	5.3 (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 violations. The ten minute pH violations were identified during an inspection on 3/29/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be failure to properly rinse containers. The IU responded to the violations by having additional staff rinse these containers and adding additional oversight into their process, as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 4/20/2012 and collected by the IU on 5/14/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	3/29/2012	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 violations. The ten minute pH violations were identified during an inspection on 3/29/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be failure to properly rinse containers. The IU responded to the violations by having additional staff rinse these containers and adding additional oversight into their process, as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 4/20/2012 and collected by the IU on 5/14/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	4/1/2012	OTHER						NV	The violations were for late submittal of an SMR that was due on 3/31/2012, but was not received until 6/8/2012 and for failing to comply with a permit condition – collecting samples within the 10/1/2011 to 3/31/2012 reporting period. The cause of the violations was determined to be negligence on the part of the IU. This case has been referred to the City Attorney's Office for enforcement. See 7/11/2012 Compliance Meeting for additional details.
					6/8/2012	OTHER						NV	The violations were for late submittal of an SMR that was due on 3/31/2012, but was not received until 6/8/2012 and for failing to comply with a permit condition – collecting samples within the 10/1/2011 to 3/31/2012 reporting period. The cause of the violations was determined to be negligence on the part of the IU. This case has been referred to the City Attorney's Office for enforcement. See 7/11/2012 Compliance Meeting for additional details.
												AC	$625 fine issued for Permit Conditions – Late Reporting per San Jose Municipal Code 15.14.795.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	6/14/2012	OTHER						NV AC	The violation was for late submittal of a letter that was due on 5/10/2012, but was not received until 6/14/2012. The IU has committed to timely submittal of reports in the future. $500 fine issued for Discharge Reports – Late Reporting per San Jose Municipal Code 15.14.695.

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Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Solar Junction Inc. 401 Charcot Ave San Jose, CA 95131 SJ-624B **Flow =** 450 40 CFR 469 Subpart A	SNF/ SNL	SNF/ SNL	SNF/ SNL	CC	6/26/2012	OTHER						NV	The violation was for failing to submit an SMR that was due on 9/30/2011 and for failing to comply with a permit condition – collecting samples within the 4/1/2011 to 9/30/2012 reporting period. The cause of the violation was determined to be negligence on the part of the IU. This case has been referred to the City Attorney's Office for enforcement. See 7/11/2012 Compliance Meeting for additional details.
												AC	$750 fine issued for Permit Conditions – Late Reporting per San Jose Municipal Code 15.14.795.
												CM	At a Compliance Meeting on 7/11/2012 the violations and Compliance Agreement were discussed. The IU responded to the violations by committing to timely submittal of future reports. In addition, the IU is required to conduct sampling and submit the SMR that was due 9/30/2011 by 7/31/2012.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	12/20/2011	OTHER						NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failure to report violations, and failure to maintain continuous pH chart recorder. The 75 minute pH violation was identified during an inspection on 12/20/2011. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be improper training and failure to follow procedures. The IU responded to the violations by retraining employees and implementing daily checks of the pH chart recorder, as verified during an inspection on 2/3/2012. The pH chart recorder was also reviewed and no further violations were noted. The result of a subsequent sample collected by the IU on 2/6/2012 was not in compliance, resulting in additional enforcement actions. The result of a subsequent sample collected by the City on 2/13/2012 was in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	12/20/2011	OTHER	pH	13 13(min)		12.5		NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failure to report violations, and failure to maintain continuous pH chart recorder. The 75 minute pH violation was identified during an inspection on 12/20/2011. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be improper training and failure to follow procedures. The IU responded to the violations by retraining employees and implementing daily checks of the pH chart recorder, as verified during an inspection on 2/3/2012. The pH chart recorder was also reviewed and no further violations were noted. The result of a subsequent sample collected by the IU on 2/6/2012 was not in compliance, resulting in additional enforcement actions. The result of a subsequent sample collected by the City on 2/13/2012 was in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	1/5/2012	OTHER						NV	The violations were for failing to meet the local pH limit, as noted on the IU's pH chart recorder, failure to report violations, and failure to maintain continuous pH chart recorder. The 75 minute pH violation was identified during an inspection on 12/20/2011. The IU failed to report the pH violation within 24 hours. The causes of the violations were determined to be improper training and failure to follow procedures. The IU responded to the violations by retraining employees and implementing daily checks of the pH chart recorder, as verified during an inspection on 2/3/2012. The pH chart recorder was also reviewed and no further violations were noted. The result of a subsequent sample collected by the IU on 2/6/2012 was not in compliance, resulting in additional enforcement actions. The result of a subsequent sample collected by the City on 2/13/2012 was in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	1/6/2012	OTHER						NV	The violation was for late submittal of an SMR that was due on 11/30/2011 but was not received until 1/6/2012 and late submittal of a violation response that was due on 12/16/2011 but was not received until 1/6/2012. The IU has committed to timely submittal of reports in the future.
					1/20/2012	OTHER						WN	The violation was for late submittal of a violation response that was due on 1/10/2012 but was not received until 1/20/2012. The IU has committed to timely submittal of reports in the future.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011		POTW/ IU/ OTHER		Max	Fed Avg / Local Avg	Federal Max / Federal Avg	Local Max / Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	2/6/2012	OTHER						NV	The violations were for failing to comply with a permit conditions - failure to analyze and collect samples using 40 CFR 136 methods, failing to meet the local pH limit, failure to report violations, and local falsification of information. The causes of the violations were determined to be IU personnel taking pH sample, instead of requesting service from certified laboratory. The IU responded to the violations by retraining all employee's including supervisors and managers and resampling. An inspection on 3/9/2012 verified IU understood that all sample results in violation must be reported within 24 hours and pH samples must be analyzed by a certified lab within 15 minutes from collection time. The results of subsequent samples collected by the IU on 3/14/2012 and collected by the City on 3/28/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	2/6/2012	OTHER	pH	5.53 (min)			6.0 (min)		NV	The violations were for failing to comply with a permit conditions - failure to analyze and collect samples using 40 CFR 136 methods, failing to meet the local pH limit, failure to report violations, and local falsification of information. The causes of the violations were determined to be IU personnel taking pH sample, instead of requesting service from certified laboratory. The IU responded to the violations by retraining all employee's including supervisors and managers and resampling. An inspection on 3/9/2012 verified IU understood that all sample results in violation must be reported within 24 hours and pH samples must be analyzed by a certified lab within 15 minutes from collection time. The results of subsequent samples collected by the IU on 3/14/2012 and collected by the City on 3/28/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Streamline Circuits 1415 Richard Ave Santa Clara, CA 95050 SC-350A **Flow =** 114,193 40 CFR 433.17 Subpart A	CC	IF/ IL	SNF/ SNL	SNF/ SNL	3/28/2012	OTHER						NV	The violation was for late submittal of a violation response that was due on 2/29/2012 but was not received until 3/28/2012. The IU has committed to timely submittal of reports in the future.
Sun Surface Technology 950 Rincon Cir San Jose, CA 95131 SJ-510B **Flow =** 308 40 CFR 433.17 Subpart A	CC	IF/ IL	CC	CC	2/22/2012	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 failure to analyze the pH sample within the 15 minute hold time. The IU responded to the violation by resampling and ensuring that pH analysis will be conducted on site by their contract laboratory, as verified during an inspection on 4/10/2012.

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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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Supertex, Inc. 71 Vista Montana Dr San Jose, CA 95134 SJ-398B **Flow =** 16,565 (on 12/05/11) 40 CFR 469 Subpart A	CC	CC	IF/ IL	CC	11/13/2011	OTHER	pH	5.0 (min)			6.0 (min)	WN	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. A total of two pH violations with durations of five and 10 minutes were identified during an inspection on 12/13/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a clogged chemical feed tube. The IU responded to the violations by enlarging the size of the chemical feed tubing as verified during an inspection on 6/14/2012. The pH chart recorder was also reviewed and an additional violation was noted. The results of samples collected by the City on 12/15/2012 and by the IU on 3/2/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)	Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
Supertex, Inc. 71 Vista Montana Dr San Jose, CA 95134 SJ-398B **Flow =** 16,565 (on 12/05/11) 40 CFR 469 Subpart A	CC	CC	IF/ IL	CC	11/25/2011	OTHER	pH	4.8 (min)	5.0 (min)	6.0 (min)	WN	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. A total of two pH violations with durations of five and 10 minutes were identified during an inspection on 12/13/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a clogged chemical feed tube. The IU responded to the violations by enlarging the size of the chemical feed tubing as verified during an inspection on 6/14/2012. The pH chart recorder was also reviewed and an additional violation was noted. The results of samples collected by the City on 12/15/2012 and by the IU on 3/2/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011		POTW/ IU/ OTHER		Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Supertex, Inc. 71 Vista Montana Dr San Jose, CA 95134 SJ-398B **Flow =** 16,565 (on 12/05/11) 40 CFR 469 Subpart A	CC	CC	IF/ IL	CC	12/13/2011	OTHER						WN	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. A total of two pH violations with durations of five and 10 minutes were identified during an inspection on 12/13/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a clogged chemical feed tube. The IU responded to the violations by enlarging the size of the chemical feed tubing as verified during an inspection on 6/14/2012. The pH chart recorder was also reviewed and an additional violation was noted. The results of samples collected by the City on 12/15/2012 and by the IU on 3/2/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max Avg	Local Max Avg		
T. Marzetti Co.- West 876 Yosemite Dr Milpitas, CA 95035 MI-004C **Flow =** 34,819 SIU based on flow	IL	IL	IL	CC	3/28/2012	POTW	O&G	6,190		150		NV	The violation was for exceeding the local maximum allowable oil & grease concentration limit. The cause of the violation was determined to be improper treatment of oil & grease wastewater. The IU responded to the violation by updating their standard operating procedures for employees that are new to wastewater treatment. An inspection on 6/26/2012 verified that the new standard operating procedures were in place. The result of subsequent samples collected by the IU on 6/4/2012 and collected by the City on 6/7/2012 were in compliance. See 6/14/2012 Compliance Meeting for additional details.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
												CM	At a Compliance Meeting on 6/14/2012, the violation and Compliance Agreement were discussed. The IU responded to the violations by conducting additional training, submitting revised standard operating procedures (SOPs) for wastewater treatment and record keeping, and submitting a detailed diagram of the wastewater treatment system piping. In addition to these requirements, the IU is required to conduct semi-annual wastewater treatment operator training and collect samples for three months – June 2012, July 2012, and August 2012. An inspection on 6/26/2012 verified that the IU has updated their SOPs for wastewater treatment and record keeping and that wastewater treatment operator training has been conducted. The results of subsequent samples collected by the IU on 6/4/2012 and collected by the City on 6/7/2012 were in compliance.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
T. Marzetti Co.- West 876 Yosemite Dr Milpitas, CA 95035 MI-004C **Flow =** 34,819 SIU based on flow	IL	IL	IL	CC	5/25/2012	OTHER						VW	The violation was for failing to comply with a permit condition – failure to maintain continuous pH recorder. The cause of the violation was determined to be an oversight by the IU. The IU responded to the violation by taking corrective action, as verified during an inspection on 5/25/2012.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
United Supertek, Inc. 118 Charcot Ave San Jose, CA 95131 SJ-122B **Flow =** 747 40 CFR 433.17 Subpart A	NS	CC	NS	CC	3/7/2011	OTHER	pH	5.1 (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 violations. A total of three pH violations with durations of 10 minutes each were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a faulty pH recorder. The IU responded to the violations by replacing the chart recorder as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/4/2012 and collected by the IU on 2/22/2012 were in compliance.

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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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
United Supertek, Inc. 118 Charcot Ave San Jose, CA 95131 SJ-122B **Flow =** 747 40 CFR 433.17 Subpart A	NS	CC	NS	CC	3/22/2011	OTHER	pH	5.4 (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 violations. A total of three pH violations with durations of 10 minutes each were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a faulty pH recorder. The IU responded to the violations by replacing the chart recorder as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/4/2012 and collected by the IU on 2/22/2012 were in compliance.

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VW - Verbal Warning
SC - Sewer Surcharge
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CM - Compliance Meeting

Semi-Annual Industrial User Violation Report

San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
United Supertek, Inc. 118 Charcot Ave San Jose, CA 95131 SJ-122B **Flow =** 747 40 CFR 433.17 Subpart A	NS	CC	NS	CC	3/24/2011	OTHER	pH	5.2 (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 violations. A total of three pH violations with durations of 10 minutes each were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a faulty pH recorder. The IU responded to the violations by replacing the chart recorder as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/4/2012 and collected by the IU on 2/22/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
United Supertek, Inc. 118 Charcot Ave San Jose, CA 95131 SJ-122B **Flow =** 747 40 CFR 433.17 Subpart A	NS	CC	NS	CC	11/22/2011	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 violations. A total of three pH violations with durations of 10 minutes each were identified during an inspection on 11/22/2011. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be a faulty pH recorder. The IU responded to the violations by replacing the chart recorder as verified during an inspection on 6/7/2012. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 1/4/2012 and collected by the IU on 2/22/2012 were in compliance.

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Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
U-Tech Media USA, LLC 1105 Montague Ct Milpitas, CA 95035 MI-124B **Flow =** 79 40 CFR 433.17 Subpart A	IF/ IL	CC	CC	IL	4/19/2012	OTHER						WN	The violation was for failing to comply with a permit condition – using required sample collection method. The cause of the violation was determined to be an oversight on the part of the IU. The IU was unable to resample in response to this violation since they had ceased discharge and closed their facility, as verified during inspections on 5/15/2012 and 5/31/2012.
Vector Fabrication 1629 Watson Ct Milpitas, CA 95035 MI-059B **Flow =** 445 40 CFR 433.17 Subpart A	CC	IL	NS	CC	4/30/2012	OTHER						VW	The violation was for late submittal of an SMR that was due on 3/31/2012 but was not received until 4/30/2012. The IU has committed to timely submittal of reports in the future.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Max	Local Avg		
Viasystems Corporation 335 Turtle Creek Ct San Jose, CA 95125 SJ-625B **Flow =** 46,189 40 CFR 433.17 Subpart A	CC	CC	CC	CC	6/18/2012	OTHER	pH	3.0 (min)	5.0 (min)	6.0 (min)	WN	The violations were for failing to meet the federal and local pH limits, as noted on the IU's pH chart recorder. The seven minute pH violations were reported by the IU on 6/18/2012. The cause of the violations were determined to be operator error. The IU responded to the violations by performing an internal corrective/preventative action report, terminating the employee identified to have failed to follow their internal written procedure, installing a pH activated pump shutoff at the source location, and retraining employees as verified during an inspection on 6/22/2012. The pH chart recorder was also reviewed and no further violations were noted.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max Fed Avg Local Avg	Federal Max	Federal Avg Local Max Local Avg		
Vishay/Siliconix 2201 Laurelwood Rd Santa Clara, CA 95054 SC-282A **Flow =** 258,333 (on 08/03/11) 40 CFR 433.17 Subpart A 40 CFR 469 Subpart A	CC	CC	NS	CC	4/22/2012	OTHER	pH	2.6 (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 2.5 minute pH violation was reported by the IU on 4/23/2012. The cause of the violation was determined to be a failure of the sodium hydroxide injection system. The IU responded to the violation by manually adjusting the sodium hydroxide injection system, as verified during 4/23/2012 inspection. The pH chart recorder was also reviewed and no further violations were noted. The results of subsequent samples collected by the City on 4/23/2012 and by the IU on 5/9/2012 were in compliance.

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San Jose/Santa Clara Water Pollution Control Plant

Reporting Period 1/1/2012 to 6/30/2012

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 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Wafer Reclaim Service, LLC 2240 Ringwood Ave San Jose, CA 95131 SJ-552B **Flow =** 31,653 SIU based on flow	CC	IL	CC	CC	1/27/2012	OTHER	pH	5.6 (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 violations. The five minute and 15 minute pH violations were identified during an inspection on 5/9/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be inadequate procedures. The IU responded to the violation by adding additional procedures for response to pH alarms.
					2/9/2012	OTHER	pH	5.6 (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 violations. The five minute and 15 minute pH violations were identified during an inspection on 5/9/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be inadequate procedures. The IU responded to the violation by adding additional procedures for response to pH alarms.

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	Current		Previous					Reported Level (mg/L)		Discharge Limit (mg/L)			
	Q2 2012	Q1 2012	Q4 2011	Q3 2011				Max	Fed Local Avg	Federal Max	Federal Avg	Local Max	Local Avg		
Wafer Reclaim Service, LLC 2240 Ringwood Ave San Jose, CA 95131 SJ-552B **Flow =** 31,653 SIU based on flow	CC	IL	CC	CC	5/9/2012	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 violations. The five minute and 15 minute pH violations were identified during an inspection on 5/9/2012. The IU failed to report the pH violations within 24 hours. The cause of the violations was determined to be inadequate procedures. The IU responded to the violation by adding additional procedures for response to pH alarms.

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COMPLIANCE WITH PRETREATMENT PROGRAM REQUIREMENTS

2009 Pretreatment Program Compliance Audit

On January 4, 2011, the City received the 2009 City of San José Pretreatment Compliance Audit Summary Report (2009 PCA Summary Report) for an audit conducted by United States Environmental Protection Agency (EPA) contractors from Tetra Tech, Inc. and PG Environmental, LLC on October 28-29, 2009. The City has responded to all findings of the 2009 PCA Summary Report; a summary is attached.

2011 Pretreatment Program Compliance Inspection

On April 11, 2011, the City received the 2011 City of San José Pretreatment Compliance Inspection Summary Report (2011 PCI Summary Report) for an inspection conducted by EPA contractors from PG Environmental, LLC on January 24-25, 2011. The City has responded to all findings of the 2011 PCI Summary Report; a summary is attached.

2012 Pretreatment Compliance Inspection

On January 5, 2012, a Pretreatment Compliance Inspection was conducted by EPA contractors from PG Environmental, LLC. The inspection report is pending as of the date of this report.

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
1	The City's SUO does not specify the required federal certification statement [40 CFR 403.12(l)] that must be submitted with baseline monitoring reports, report on compliance with categorical pretreatment standard deadline, and periodic compliance reports. Therefore, the City is required to revise the SUO to include the required certification statement that must be submitted with reports. (Section 5.3, Reporting Requirements)	While the City's SUO allows sufficient legal basis under sections 15.14.585, 15.14.695, and 15.14.745 to implement the minimum federal reporting requirements listed at 40 CFR 403.8 and 403.12, the City updated its SUO 15.14.745 to include the following, "Reports subject to the requirements of Title 40 of the Code of Federal Regulations shall include the certification statement as contained in Title 40 of the Code of Federal Regulations (40 CFR 403.12(l))." Additionally, the City includes the specific federal certification language in the reporting forms for each instance where federal regulations require the certifying statement. Copies of a blank Industrial Waste Discharge Permit (Discharge Permit) Application, a blank Self Monitoring Report with blank Total Toxic Organic Certification attachment, a blank Baseline Monitoring Report, and a blank zero discharge categorical certification statement were included in Attachments 43, 44, 45, and 46, respectively from *5/27/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response (5/27/2011 Response)* .	Completed
2	The City is not adequately characterizing its nondomestic dischargers. The City is required to ensure that it correctly classifies Coast Engraving and issues it a correct permit as necessary. Furthermore, the City is required to formally evaluate the deburring/tumbling operation at Kearney Pattern Works and Foundry and ensure that the City adequately classifies, permits, and monitors all process wastewater discharges. (Section 6, Nondomestic User Characterization)	The City was, at the time of the PCA, in the process of re-permitting Coast Engraving based on our Program's identification of this facility discharging while under permit as a Categorical Zero Discharger. Coast Engraving has now been re-permitted as an Industrial Discharger under the federal categorical standard at 40 CFR 433.17(a) for New Source Metal Finishers. This Industrial User was formerly permitted as a Categorical Zero Discharger under 40 CFR 413 Subpart A-H. Although they perform chemical etching and milling operations, which are subject to the subpart F, when they changed their operations to begin pretreatment of their wastewater for discharge to the sanitary sewer, they had the opportunity to upgrade their treatment system, bringing them under the categorical standards at 40 CFR 433.17(a). A copy of Coast Engraving's Zero Discharge Categorical Permit and factsheet are included in Attachment 15 in the *5/27/2011 Response* .	Completed
		The City correctly characterized Kearney Pattern Works as a Zero Discharge Categorical user for their foundry process under 40 CFR 464 because there is no discharge of categorical process wastewater to the sanitary sewer. However, the City had not documented the presence of the machining operation and the facility's discharge as part of the Zero Discharge Categorical Permit. The City now documents clearly any non-categorical discharges at a Zero Discharge Categorical Process. The City's standard business practice does not require a Discharge Permit for tumbler wastewater from machine shop processes to be discharged to the sanitary sewer. Industrial Users performing this operation are instructed to follow Best Management Practices (BMPs) for handling wastes. This Industrial User has been given a copy of BMPs for Machine Shops, which has procedures for the discharge of waste waters from tumbled aluminum parts. A copy of the updated factsheet, which now reflects the presence of the machining operation as well as the distribution of the BMPs, is included in Attachment 22 in the *5/27/2011 Response* .	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
3	The file review revealed that Advanced Surface Finishing's permit expired on September 15, 2009. Therefore, the City is required to ensure that the Advance Surface Finishing is not discharging without a valid permit or the City should reissue Advance Surface Finishing a permit to ensure that the facility is not in violation of the City's SUO. (Section 7.1, Expired Permits)	The City issued a Discharge Permit to Advanced Surface Finishing on 12/23/2009. Copies of the permit and factsheet are included in Attachment 1 in the *5/27/2011 Response*. The City also revised permitting procedures to ensure alignment of permit expiration and reissuance, and has applied this practice to all permits issued since April 2011.	Completed
4	The permits reviewed do not adequately require nondomestic users to report all significant changes. Therefore, the City is required to ensure that its requirement of notification of significant change also includes decreases in production and flow. (Section 7.2, Notification of Significant Change)	In response to the PCA, the City now includes in its permit language for all new permits issued to Industrial Users, including those with production based limits, the requirement for notification of decreases in volume of discharge which may be considered substantial pursuant to 40 CFR 403.12(j). Existing Industrial User permits with production-based limits are in the process of being reissued. Copies of Jennings Technology Corporation's Discharge Permit and factsheet will be included as an attachment to the response that will be included in the "Program Changes" section of the 2011 Annual Industrial User Pretreatment Compliance Report (2011 Annual Report) pending EPA staff guidance on the Discharge Permit limits. Also, the City updated its SUO section 15.14.405, to further define and clarify when an increase or decrease in flow indicates a significant change.	Completed
5	The PCA revealed several instances where the City is inappropriately applying pretreatment standards and requirements. The City is required to revise Clean Harbors' permit to include the correct list of applicable categorical effluent limits. In addition, the City is required to determine whether Coast Engraving is an existing electroplating facility or a new metal finishing facility and apply the applicable categorical standards in the revised permit. Furthermore, the City is required to evaluate the tin casting operations at Babbitt Bearing Company to determine if the facility should also be subject to 40 CFR Part 471 and revise its permit accordingly. (Section 8, Application of Pretreatment Standards and Requirements)	The City has revised Clean Harbor's Discharge Permit and factsheet to include the correct list of applicable categorical effluent limits. The removal of the federal selenium and cyanide limits were also discussed with the industrial user during their 9/21/2010 inspection. Copies of the Discharge Permit, factsheet, and 9/21/2010 inspection report are included in Attachments 11 and 12 in the *5/27/2011 Response*. Coast Engraving, Inc. has been permitted as an industrial discharger under the new source metal finisher categorical standard at 40 CFR 433.17(a). The facility significantly changed their process in 2009 by becoming a discharging Categorical Industrial User and installing a pretreatment system. Copies of the Discharge Permit and factsheet are included in Attachment 15 in the *5/27/2011 Response*. The City has evaluated the tin casting operation at Babbitt Bearing Company. 40 CFR 471 Nonferrous Metals Forming and Metal Powders, does not apply because the tin casting operation does not involve either the forming operations or the ancillary operations described in 40 CFR 471.01. 40 CFR 464 Metal Molding and Casting Industry Point Source Category and Effluent Limitations Guidelines, Pretreatment Standards also does not apply to the operation as indicated in the Final Rule from the Federal Register, October 30, 1985, in Appendix H, Subcategories and Process Segments, where it lists under the heading of: Not Regulated Because they Do Not Generate Wastewater, the Tin Casting operation. Copies of the Zero Discharge Categorical Permit and factsheet are included in Attachment 9 in the *5/27/2011 Response*.	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
6	The Jennings Technology Corporation files do not contain the necessary historical information for the auditors to make the determination whether the City correctly classified the facility, and City personnel were unsure about when the facility began its metal finishing process operations. The City is required to have adequate documentation of its categorical determinations such that an oversight authority can review them. The auditors strongly recommend that the City document such information in each Significant Industrial User file, such as in a fact sheet. (Section 8, Application of Pretreatment Standards and Requirements)	The City's current factsheet is limited by the functionality of the data management system, and only captures the date current operations began, date construction began, date pretreatment began, and date of initial discharge in the factsheet. The factsheet can indicate if the facility was previously permitted and the previous permit number if it is different than the current one, but cannot list a historical record of the process changes and associated categorical determinations at the facility. The City developed a new database upgrade that allows more flexibility for storing and using company data, and a new factsheet that is able to store a historical record of process changes to the process line or facility. The City also is including a summary of historical information and justification for decisions in the permit factsheets for permit renewals and amendments. Jennings Technology Corporation is to include this historical information, as part of the reissue of its current permit. During drafting of the new permit, the City identified calculated limit issues, outside the scope of the 2009 PCA/2011 PCI response, that required EPA staff assistance on how to best address permitting this facility. The recommended solution by EPA staff requires adopting portions of the streamlining rule. As a result, the reissuance of Jennings Technology Corporation's Permit is expected to be delayed until after streamlining rule adoption. However, the current factsheet for Jennings Technology Corporation does include the historical information. A copy of this factsheet is included as Attachment 1 of this update.	Completed
7	Mohawk Packing's permit states that the facility is subject to the categorical standards of 40 CFR 432.8 subpart H; however, no such categorical standards exist. Therefore, the City is required to revise Mohawk Packing's permit to reflect the facility's correct classification. Furthermore, because no pretreatment regulations are listed in 40 CFR 432.80, the City can classify the facility as a noncategorical SIU rather than a CIU. (Section 8, Application of Pretreatment Standards and Requirements)	The City amended the permit for Mohawk Packing to remove the reference to 40 CFR 432.8 subpart H. The permit has been amended to reflect the facility's classification as a noncategorical SIU because there are no pretreatment regulations listed in 40 CFR 432.80. A copy of the 2/28/2011 Discharge Permit amendment letter is included in Attachment 28 in the *5/27/2011 Response* .	Completed
8	The auditors could not find any cyanide compliance monitoring during the second half of 2008 or any for 2009 at Jennings Technology Corporation sampling point 002. Therefore, the City is required to conduct compliance monitoring for cyanide at sampling point 002 to comply with the pretreatment program implementation requirements listed at 40 CFR 403.8(f)(2)(v). (Section 9.1, Compliance Sampling)	Copies of City sample results from 2008 and 2009 for Jennings Technology Corporation sample point 02 are included in Attachment 19 in the 5/27/2011 Response. Current information regarding the results was available at the time of the PCA through the program database; hard copies of these documents have since been re-filed.	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
9	The audit team could not find documented and complete pretreatment inspection reports for Univar USA, Inc., and SVTC Technology. Because the City has established a more frequent compliance inspection frequency than the minimum federal requirements, the City is required to implement its pretreatment program as established. These annual inspections should include a complete walk-through of an SIU's facility, including its process lines, chemical and hazardous waste storage areas, pretreatment facilities, and spill-prevention procedures. Therefore, the City is required to ensure that it inspects all SIUs at the frequency established by the City's approved pretreatment program and that the City adequately document those inspections. (Section 9.2, Compliance Inspections)	Section 9.3 of the PCA Summary Report states on page 26 for Univar USA, Inc. that: On November 3, 2009, the City conducted a follow-up inspection to determine whether or not industrial wastewater is discharged by the facility. According to the City's inspection report, the City inspectors confirmed that the facility discharges only domestic wastewater and that the facility does not wash any drums, totes, or containers on site. Therefore, no additional action is required. The City concurs with this finding.	Completed
		The City has conducted all inspections, as necessary, to ensure adequate compliance. SVTC Technologies, LLC has had several ownership changes; however the facility, through the changes, have been inspected at least twice per year as required for this "consistent" type of discharger. In 2008, the facility was repermitted as SVTC Technologies, Inc. SJ-569B. A permit inspection was conducted on 6/13/2008. Source Control inspections were conducted on 7/24/2008 (Compliance), 9/12/2008 (Annual), 4/8/2009 (Compliance), 9/22/2009 (Annual), and 10/28/2009 (Compliance). The facility had an ownership change in 2010 and the facility was repermitted as SJ-611B. A permit inspection was conducted on 2/4/2010. Source Control inspections were conducted on 5/18/2010 (Compliance), 10/29/2010 (Annual), and 12/8/2010 (Compliance Enforcement follow-up). Copies of these inspection reports are included in Attachment 37 in the *5/27/2011 Response*.	Completed
		The City has a program to ensure that it inspects all SIUs at the frequency established by the City's approved pretreatment program. The City uses a database to track inspections completed throughout the year compared to the number of inspections required. In addition, the City finalized inspection procedures and that requires documenting a complete walk-through of an SIU's facility, including its process lines, chemical and hazardous waste storage areas, pretreatment facilities, and spill-prevention procedures. The City implemented the database upgrade that included an improved inspection module in March 2012. Inspectors were also trained to include all details in the comments section of the inspection reports.	Completed
10	The site visit to Advance Surface Finishing revealed that the facility's pretreatment system might be using dilution to meet effluent limits. The City is required to thoroughly evaluate the treatment process with the operations manager to ensure that dilution is not being used. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	During the time of the EPA audit, the City was conducting surveillance sampling of the site and found the facility in non-compliance. The facility was found to have several copper, lead, nickel, and silver local maximum allowable concentration violations and were issued several enforcement actions included in Attachment 3 from *5/27/2011 Response*. The City reinspected the facility on 11/23/2010 and 5/2/2011 and conducted surveillance at the end of 2010, and the facility was in compliance. Copies of the inspection reports are included in Attachment 2 in the *5/27/2011 Response*. The City reviewed the flow of the facility and confirmed that no dilution appears to be occurring.	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
11	ALSCO's site visit revealed several deficiencies with the facility's storage procedures. The facility is required by law to label the waste oil as hazardous waste. The facility is required to take immediate action to eliminate the leak from the FOG waste bin. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has verified that ALSCO has taken action to eliminate the leak from the FOG waste bin by installing secondary containment for the oil and grease waste holding tank. The unlabeled, used hydraulic oil drum indicated has been labeled and is also secondarily contained. All drummed waste, including empty drums, and the solid dumpster bin have been replaced as well. Copies of the 10/28/2009 and 3/9/2010 inspection reports are included in Attachment 4 in the *5/27/2011 Response* .	Completed
12	An inspection ALSCO's bulk chemical storage and cleaning solution area showed that the tank hose taps do not have permanent spill trays, and a garden-type hose that appeared to be used for cleanup (by hosing the area down) was observed. The facility is required to remove the garden hose from the bulk chemical and solution storage area and implement a dry cleanup standard operating procedure. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has verified that ALSCO has taken action to remove the garden hose from the bulk chemical and solution storage area. A copy of the 3/9/2010 inspection report is included in Attachment 4 in the *5/27/2011 Response* . ALSCO was also recently required to submit a slug plan to document control of gray water release and clean up procedure. The City received a slug discharge control plan from ALSCO on 7/20/2011, after ALSCO requested additional time for completion. The first page of this Slug Plan is included in Attachment 1 of *7/29/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* included in the *2011 1st Semi-Annual Industrial User Pretreatment Compliance Report* (*7/29/2011 Response*).	Completed
13	ALSCO has a water softener system designed to treat up to 131,600 gpd. The facility is required to evaluate and provide the maintenance requirements (i.e., regeneration protocols) for the water softener system. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	ALSCO has provided, via e-mail, a description of their water softener maintenance requirements for the system. This 2/3/2011 e-mail is included in Attachment 5 of the 5/27/2011 Response, along with the operating procedures for the ultra pure water system "Norchem reclaim system," which reuses wash process water. At the 5/25/2011 inspection, ALSCO stated that the brine discharged to the a "black water holding pit." However, this was not the case. On 7/20/2011 ALSCO provided a correction to the plumbing diagram showing that the water softener discharges directly to the sample point or is stored in a brine tank that discharges to the sample point. A copy of the 5/25/2011 inspection report is included in Attachment 4 in the 5/27/2011 Response. The permit fact sheet was updated with this information. A copy of the updated factsheet is included in Attachment 1 from the updated *12/20/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* .	Completed
14	APCT is using dilution as a substitution for treatment. The City is required to evaluate the facility's wastewater flow and rinse water operations and to ensure that the facility's pretreatment system is adequately designed to handle chemical concentrations without the use of dilution. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	A review of the process lines during 5/13/2011 inspection indicate the facility is not using dilution in its process, and that the facility uses various water conservation practices in its process such as dragout tanks, part agitation, spray rinsing, and shutting off rinse tanks at breaks. Also, according to the facility contact, the site's water use has remained the same while the production has doubled. A copy of the 5/13/2011 inspection report is included in Attachment 6 in the *5/27/2011 Response* .	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
15	The site visit to Babbitt Bearing Company revealed that the facility has mislabeled its process tanks. The City is required to ensure that the facility properly labels and manages process tanks. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has verified that Babbitt Bearing has taken action to label properly their process tanks. Copies of the inspection reports on 3/25/2010 and 6/16/2010 documenting their actions taken are included in Attachment 10 in the *5/27/2011 Response* .	Completed
16	The Clean Harbor representative indicated that some of the drummed acid and alkaline wastes are stabilized on-site and then repackaged for off-site disposal or additional off-site treatment. Because the facility is not permitted to discharge such wastes to the City, the City is required to ensure that the wastes are properly disposed of and not discharged to the City. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City met with representatives of Clean Harbors San Jose, LLC on 5/25/2011 to discuss their waste management system and inspect the facility. Since Clean Harbors San Jose, LLC is regulated by the California Department of Toxic Substances Control (DTSC), Clean Harbors has a sophisticated tracking system database that tracks each tanker truck or drum of waste entering into each storage tank or treatment tank and the eventual discharge or loading of wastes to a tanker truck. Solvents from small drums and tanker trucks are pumped separately into designated tanks permitted by the DTSC for only that purpose before pumping into larger trucks for disposal off site. Waste manifests are also kept on site for each load documenting the treatment and trucking of the waste. There are also wastes treated onsite that are hauled off site. This waste is segregated into its own treatment tank. Clean Harbors San Jose, LLC does a waste analysis profile of all waste entering the site to ensure that waste is designated for hauling, treatment, offsite or sanitary sewer disposal. A copy of the 5f/25/2011 inspection report is included in Attachment 12 in the *5/27/2011 Response* and the procedure for waste analysis profiling and examples of different types of tracking reports generated from the waste tracking system are included in Attachment 13 in the *5/27/2011 Response* .	Completed
17	During the Coast Engraving site visit, about a dozen, mostly uncovered barrels and buckets were in the wastewater treatment area filled with several hundred gallons of untreated wastewater. The City is required to ensure that the facility is adequately treating and storing its process wastewater and chemicals. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has verified that Coast Engraving has taken action to store adequately their chemicals. A copy of the 2/26/2010 inspection report is included in Attachment 16 in the *5/27/2011 Response* .	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
18	Even though the City permits Kearney Pattern Works and Foundry as a zero-discharger, the auditor identified a deburring/tumbling operation in the maintenance room that discharges to the City sanitary sewer. The City is required to formally evaluate the deburring/tumbler operations and ensure that all discharges are properly permitted and monitored. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City correctly characterized Kearney Pattern Works as a Zero Discharge Categorical user for their foundry process under 40 CFR 464 because there is no discharge of categorical process wastewater to the sanitary sewer. However, the facility's permit application and factsheet did not document the non-categorical discharge. The City's standard business practice does not require a Discharge Permit for tumbler wastewater from machine shop processes to be discharged to the sanitary sewer. Industrial Users performing this operation are instructed to follow Best Management Practices for handling wastes. This Industrial User has been given a copy of BMPs for Machine Shops, which has procedures for the discharge of waste waters from tumbled aluminum parts. Copies of the 3/28/2008 Zero Discharge Categorical Permit and 1/20/2011 updated factsheet, reflecting the presence of the Machining operation as well as the distribution of the BMPs, is included in Attachment 22 in the *5/27/2011 Response*.	Completed
19	The auditor also noticed two 55-gallon drums of motor oil stored in an area of heavy traffic and not contained in secondary containment. The City is required to ensure that the facility properly manages and stores the motor oils. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has verified that Kearny Pattern Works and Foundry has taken action to properly manage and store their motor oils. The motor oil is normally kept in secondary containment, however, on the day of inspection, the company had changed oil in one of their vehicles and had not returned the barrel to the contained area. This practice is being abandoned. The company has installed a concrete barrier to improve their secondary containment. The installation was verified in the 5/20/2010 inspection report. A copy of the report is included in Attachment 23 in the *5/27/2011 Response*.	Completed
20	The auditor could not determine how and where the wastewater from cleaning Micrel, Inc.'s air scrubber filter is discharged into the pretreatment system. The City is required to confirm that there is no short-circuiting of the pretreatment system and that the pretreatment system is properly designed to treat the air scrubber cleaning wastes. Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	Based on the pink discharge and recent pH violations, the City required Micrel, Inc. to complete a slug plan that was received on 4/29/2010. In the slug plan, there is a flow diagram showing the discharge of the air scrubbers to the acid waste neutralization system. Copies of the front page of the slug plan and a flow diagram are included in Attachment 27 in the *5/27/2011 Response*. The City verified the scrubber discharge to the acid waste neutralization system during the 5/6/2011 inspection. A copy of this inspection report is included in Attachment 26 in the *5/27/2011 Response*.	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
21	The auditor noted a temporary rubber hose connecting the sump in Micrel's pretreatment area to the effluent flume. The City is required to evaluate the discharge location of the sump within the pretreatment secondary containment area, specifically addressing why the sump was discharging to the effluent flume during the site visit, and the City should document what corrective actions have been implemented to ensure that bypassing will not reoccur. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City has evaluated the discharge location of the sump within Micrel, Inc.'s pretreatment secondary containment area, and found no overarching reason why the sump needed to discharge to the effluent flume. The temporary rubber hose has been removed and the sump pump has been redirected to the acid waste neutralization system per the slug plan to prevent any contaminated rainwater from entering the storm drain. Also, during rain events the facility covers the pretreatment secondary containment area to prevent collection of rainwater, as verified during the 3/24/2010 inspection. A copy of the slug plan response letter is included in Attachment 27 of the *5/27/2011 Response* , and a copy of the inspection report is included in Attachment 26 of the *5/27/2011 Response* .	Completed
22	During the Prudential Overall Supply and T. Marzetti Company site visits, the auditor noticed that the temperature inside the sampler was noncompliant with the sampling requirements of 40 CFR Part 136. Therefore, the City is required to conduct a follow-up inspection at the facility to ensure that the facility's sampler is operating within the temperature requirements of 40 CFR Part 136. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City issued a Verbal Warning to Prudential Overall Supply for failing to comply with a permit condition - maintaining sampling equipment. An inspection on 11/30/2009 verified the Industrial User had calibrated the sample refrigerator to the correct temperature. Copies of the 10/29/2009 Verbal Warning Enforcement Action Approval Form and 11/30/2009 inspection report are included in Attachments 32 and 33 in the *5/27/2011 Response* .	Completed
		The City issued a Verbal Warning to T. Marzetti for failing to comply with a permit condition - maintaining sampling equipment. An inspection on 1/26/2010 verified the Industrial User had calibrated the sample refrigerator to the correct temperature. Copies of the 10/29/2009 Verbal Warning Enforcement Action Approval Form and 1/26/2010 inspection report are included in Attachments 39 and 40 in the *5/27/2011 Response* .	Completed
23	The SVTC Technologies representatives stated that the company was evaluating the possibility of expanding the services and fabrication tools available to clients. The City is required to formally review current and possible future operations to ensure that the facility's operations do not fall under 40 CFR Part 469 for the manufacturing of semiconductors. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The facility has not made the described process changes and were recently re-permitted due to ownership change in 2010. Copies of the 2010 permit and factsheet are included in Attachment 36 in the *5/27/2011 Response* .	Completed
24	The file reviews revealed several violations that City personnel failed to identify. Therefore, the City is required to review all sampling reports to ensure that sample holding times are not exceeded. (Section 9.4, Requesting, Receiving, and Analyzing Reports)	The City began ensuring consistent review of Self Monitoring Reports for pH hold time in January 2011. The City has also initiated using a Self Monitoring Report Checklist to assist inspectors during review of reports, including reviewing pH hold time. A copy of the Self Monitoring Report Checklist in included in Attachment 42 in the *5/27/2011 Response* .	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
25	Mohawk Packing's file review revealed that the discharger violated its oil and grease limit during the City's compliance monitoring (November 26, 2008). Therefore, the City is required to ensure that all instances of effluent limit exceedances are adequately documented in the permit files. (Section 9.4, Requesting, Receiving, and Analyzing Reports)	The City issued a Verbal Warning to Mohawk Packing on 12/23/2008 for exceeding the local limit for oil and grease. Copies of the 12/23/2008 Verbal Warning Enforcement Action Approval Form and the 11/26/2008 oil and grease sample result are included in Attachment 30. Current information regarding the results was available at the time of the PCA through the program database; hard copies of these documents have since been re-filed. The City uses its database to flag unenforced violations regularly. A copy of a 1/24/2011 Unenforced Violations report is included in Attachment 42 in the *5/27/2011 Response* as an example of the database's ability to flag violations.	Completed
26	Clean Harbors' file review revealed that the discharger is using the wrong analytical method for analyzing titanium. Therefore, the City is required to have procedures to ensure that all analyses used during SIU self-monitoring events are in compliance with the regulations set forth at 40 CFR Part 136. (Section 9.4, Requesting, Receiving, and Analyzing Reports)	The City has verified that Clean Harbor has a letter in their Industrial User file that includes a determination by EPA on the appropriateness of the testing method they use for analyzing titanium. A copy of this letter is included in Attachment 14 in the 5/27/2011 Response. Also, the City initiated the use of a Self Monitoring Report Checklist in January 2011 to assist inspectors during review of reports, including reviewing sample collection using 40 CFR methods 136. A copy of the Self Monitoring Report Checklist included in Attachment 41 in the *5/27/2011 Response* .	Completed
27	The COC reports submitted by Mohawk Packing and Jennings Technology do not specify the type of samples taken. Therefore, the City is required to review all SIU self-monitoring reports to ensure that the correct sample type was used during the self-monitoring event. (Section 9.4, Requesting, Receiving, and Analyzing Reports)	The City began ensuring consistent review of Self Monitoring Reports for the type of sample collected, grab versus composite in January 2011. The City has also initiated using a Self Monitoring Report Checklist to assist inspectors during review of reports, including the type of sample collected. A copy of the Self Monitoring Report Checklist in included in Attachment 41 in the *5/27/2011 Response* .	Completed
28	The site visits conducted during the PCA revealed that several additional SIUs should be required to develop and implement a slug discharge control plan. Therefore, the City is required to formally evaluate those facilities to determine if slug discharge control plans are needed. (Section 9.5, Slug Discharge Control Plans)	The City received slug plans from Micrel, Inc.; SVTC Technologies, LLC; and Jennings Technology Corporation. Copies of the front pages of these slug plans are included in Attachments 27, 38, and 21, respectively of the *5/27/2011 Response* .	Completed
		The City received a slug plan from ALSCO on 7/20/2011. A copy of the front page of this slug plan is included in Attachment 1 of the *7/29/2011 Response* .	Completed
29	Table 5 of the ERP includes a violation type of *Falsification-Bypassing Sample Point* . The title of the violation is not consistent with the federal definition of a bypass. Therefore, the City is required to revise its description of the violation to reflect the federal definition. (Section 10.1, Deficiencies with the ERP)	This was a title error. The City updated the title of this violation type in its ERP to reflect that bypass relates to diversion from the treatment facility and the sample point.	Completed

Table 1: 2009 Pretreatment Compliance Audit Summary Report - Requirements

#	Description	Response	Target
30	The City failed to take appropriate enforcement actions against Mohawk Plating for violating its oil and grease effluent limit. Mohawk Packing exceeded its oil and grease limit on November 26, 2008. Therefore, the City must take enforcement action against Mohawk Packing for failure to comply with its discharge permit. (Section 10.2, Failure to Take Appropriate Enforcement Actions)	The City took timely enforcement action regarding this violation by issuing a Verbal Warning to this industrial user. A copy of the 12/23/2008 Verbal Warning Enforcement Action Approval Form is included in Attachment 30 of the *5/27/2011 Response*. Current information regarding the results was available at the time of the PCA through the program database; hard copies of these documents have since been re-filed.	Completed
31	The City failed to take appropriate enforcement actions against Mohawk Plating and Prudential Overall Supply for exceeding the holding times of their pH samples. Therefore, the City must take enforcement actions against Mohawk Plating and Prudential Overall Supply for failure to comply with sampling requirements. (Section 10.2, Failure to Take Appropriate Enforcement Actions)	The Mohawk Packing Self Monitoring Report that was received on 2/28/2010 shows pH was analyzed past the hold time. However, Mohawk Packing did analyze the pH within the necessary hold for Self Monitoring Reports received on 8/10/2010 and 11/16/2010. A Notice of Violation was issued on 5/16/2011 based on the dates of violations in 2009 and 2/28/2010. A copy of the 5/16/2011 Notice of Violation issued is included in Attachment 30 of the *5/27/2011 Response*. Prudential Overall Supply has routinely exceeded its hold time, and a Notice of Violation and a Compliance Agreement were issued based on violations in 2009 and 2010. A copy of the 3/23/2011 Notice of Violation and the 3/29/2011 Compliance Agreement are included in Attachment 33 of the *5/27/2011 Response*.	Completed
32	The site visit to Kearney Pattern Works and Foundry revealed that the facility was in violation of its zero-discharge permit. The City is required to take enforcement actions against Kearney Pattern Works and Foundry for violating its zero-discharge requirement. (Section 10.2, Failure to Take Appropriate Enforcement Actions)	The City finds that an enforcement action is not required in response to this item. The City correctly characterized Kearney Pattern Works as a Zero Discharge Categorical user for their foundry process under 40 CFR 464 because there is no discharge of categorical process wastewater to the sanitary sewer. The Zero Discharge Categorical Permit prohibits the discharge of wastewater from any categorical operation to the sanitary sewer. The tumbler wastewater from the machining operation in not a categorical wastewater. This IU has been given a copy of BMPs for Machining Shops which has procedures for the discharge of waste waters from tumbled aluminum parts. The permit fact sheet was updated to reflect the presence of the Machining operation as well as the distribution of the BMPs. Copies of the Zero Discharge Categorical Permit and factsheet are included in Attachment 22 of the *5/27/2011 Response*.	Completed
33	Advance Surface Finishing's file review revealed that the facility is discharging without a valid permit, which is in violation of the City's SUO. Therefore, the City is required to take enforcement actions against Advance Surface Finishing for an unpermitted discharge. (Section 10.2, Failure to Take Appropriate Enforcement Actions)	The City issued a Discharge Permit to Advanced Surface Finishing on 12/23/2009. Copies of the permit and factsheet are included in Attachment 1 of the *5/27/2011 Response*. The City has also revised its permitting procedures to ensure alignment of permit expiration and reissuance, and has applied this practice to all permits issued since April 2011.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
1	Chapter 15.14 of the City's Sewer Use Regulations does not specifically outline all nondomestic discharger reporting requirements. To ensure that all nondomestic dischargers are aware of all reporting requirements, the City should include in its SUO either a reference to the reporting requirements listed at 40 CFR 403.8 and 403.12, or a list of the minimum federal reporting requirements. (Section 5.1, Required Streamlining Rule Changes)	While the existing SUO allows sufficient legal basis under sections 15.14.585, 15.14.695, and 15.14.745 to implement the minimum federal reporting requirements listed at 40 CFR 403.8 and 403.12, the City updated its SUO section 15.14.695 to include the following, "Dischargers are subject to the reporting requirements as contained in Title 40 of the Code of Federal Regulations as described in 40 CFR 403.8 and 403.12." The City updated its SUO section 15.14.745 (C) to include the following, "Reports subject to the requirements of Title 40 of the Code of Federal Regulations shall include the certification statement as contained in Title 40 of the Code of Federal Regulations (40 CFR 403.12(l))."	Completed
2	The City's definition of *significant change* in the SUO does not include decreases in a nondomestic discharger's production or flow rate. Therefore, the auditors strongly recommend that the City revise its definition of significant change to include decreases in production and discharge flow. (Section 5.2, Definitions)	The City adequately requires notification of significant changes in the existing SUO 15.14.765 (7), which includes the addition or deletion of process discharge. However, the City updated its SUO section 15.14.405, to further define when an increase or decrease in flow indicates a significant change. In response to the PCA, the City now includes in its permit language for all new permits issued to Industrial Users, including those with production based limits, the requirement for notification of decreases in volume of discharge which may be considered substantial pursuant to 40 CFR 403.12(j). The City has modified its permit template language for all new permits issued after 5/31/2011, to include the language regarding decreases in volume of discharge which may be considered substantial pursuant to 40 CFR 403.12(j). The City changed the language in the third paragraph of the permit cover letter template included in Attachment 47 in the 5/27/2011 Response to "If the quantity or strength of the wastewater discharge from your firm substantially changes, an application for a new permit must be submitted pursuant to [Applicable tributary agency sewer use regulations]." The City also changed the language in the Notification of Change, paragraph 2 of the Stipulations section of the permit (page 2 of Attachment 47 in the *5/27/2011 Response*) to, "In the event that the permittee anticipates an average daily production or average daily flow increase or decrease of 20% or more for a period of more than 60 calendar days, the permittee shall notify the Director of Environmental Services in writing prior to the change." In addition, the City has revised its procedures for identifying significant changes.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
3	The SUO does not specifically list all the federally required reports. To ensure that all nondomestic dischargers are aware of all reporting requirements, the City should either include a reference to the reporting requirements listed at 40 CFR 403.8 and 403.12, or include in its SUO a list of the minimum federal reporting requirements. (Section 5.3, Reporting Requirements)	While the existing SUO allows sufficient legal basis under sections 15.14.585, 15.14.695, and 15.14.745 to implement the minimum federal reporting requirements listed at 40 CFR 403.8 and 403.12, the City updated its SUO section 15.14.695 to include the following, "Dischargers are subject to the reporting requirements as contained in Title 40 of the Code of Federal Regulations as described in 40 CFR 403.8 and 40 CFR 403.12." The City also updated its 15.14.745(C) to include the following, "Reports subject to the requirements of Title 40 of the Code of Federal Regulations shall include the certification statement as contained in Title 40 of the Code of Federal Regulations (40 CFR 403.12(l))."	Completed
4	Section 15.14.585 does not specify that the director has the authority to develop additional limitations as deemed necessary. Therefore, the audit team recommends that the City revise its SUO to include a provision that allows the director to develop and implement additional limits as deemed necessary. (Section 5.4 Pretreatment Standards-Local Limits)	The City's process for adopting new local limits requires an ordinance change which requires the approval of the City Council. The Director may recommend local limit changes, and implement the changes if approved by the Council.	Completed
5	Coast Engraving's zero-discharge permit lists the applicable local limits, but it does not list the categorical effluent limits that would apply if the facility was to discharge process wastewater. Therefore, the auditors strongly recommend that the City includes in all zero discharging CIU permits all applicable effluent limits—both local limits and categorical effluent limits. (Section 7.3, Categorical Standards)	The City considered including the categorical effluent limits during the development of the Zero Discharge Categorical Permit. The Zero Discharge Categorical Permit does not allow any categorical wastewater to be discharged, and listing an effluent limit could give the impression that a discharge of categorical wastewater would be acceptable up to the limits in the permit. The categorical effluent limits were left out of the Zero Discharge Categorical Permits to prevent any confusion, and the City does not agree that Zero Discharge Categorical Permits should list Federal Categorical effluent limits.	Completed
6	The Jennings Technology Corporation's permit does not specify which limits (local limits or the adjusted categorical limits) are more stringent at sampling point 002. Because that is not clearly reflected in the permit, the auditors strongly recommend that the City revise Jennings Technology Corporation's permit to clearly reflect that both the local limits and the adjusted categorical limits are applicable at sampling point 002 and that the discharge could violate both sets of limits at the sampling point. Furthermore, the auditors recommend that the City clearly document this rationale within the facility's fact sheet. (Section 7.4, Application of Most Stringent Limit)	The summary report incorrectly identifies "sample point 02" as "002." The local and adjusted categorical limits are not applied at sample point 02. Sample point 02 is the federal categorical cyanide sampling point, used to monitor cyanide only. The final sample point 01 applies both the adjusted federal limits and the local limits. The City enforces both the local and federal limits at the final discharge point, not only the more stringent limit. The City has carefully reviewed the current permit for Jennings and finds that the permit clearly documents the limits applied at sample point 01, with the federal adjusted categorical limits shown on page 2 and the local limits shown on page 15.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
7	The fact sheets do not contain enough historical data to track or ensure that a discharger is correctly classified as an existing or new source. Therefore, the audit team strongly recommends that the City include in each of the SIU fact sheets a timeline outlining the first date of production and any subsequent changes to the process line or facility. (Section 7.5, Fact Sheets)	The City's previous database management system factsheet module had limited functionality, and only captured the date current operations began, the date construction began, the date pretreatment began, and the date of initial discharge in the factsheet. The factsheet could indicate if the facility was previously permitted and the previous permit number if it was different than the current one, but could not list a historical record of the process changes and associated categorical determinations at the facility. On March 2012, the City implemented a new database upgrade, which allows more flexibility for storing and using company data, and a new factsheet that is able to store a historical record of process changes to the process line or facility. The City is including a summary of the historical information and justification for decisions in the permit factsheets for applicable permit renewals and permit amendments.	Completed
8	The audit team found several deficiencies with the City's inspection procedures. The City should evaluate its inspection training modules for its inspectors to ensure that they emphasize the importance of thorough documentation, and the City should offer periodic training for inspectors to ensure that they are aware of the documentation requirements. (Section 9.2, Compliance Inspections)	The City updated its inspection report procedures to require documenting a complete walk-through of an SIU's facility, including its process lines, chemical and hazardous waste storage areas, pretreatment facilities, and spill-prevention procedures. The City is also instituting regular training sessions for all inspectors.	Completed
		In addition, the new Environmental Enforcement Database inspection report form module was redesigned to provide for additional comments versus check boxes to better document inspection activities. The City implemented the database upgrade in March 2012. Inspectors were also trained to include all details in the comments section of the inspection reports.	Completed
9	During the site visits, the audit team noticed that the City inspectors routinely sign in at the facilities they are inspecting. Therefore, City inspectors should determine, before signing in, whether it would preclude them from reporting what they see during the inspection. (Section 9.2, Compliance Inspections)	After consulting with the City Attorney, the City had determined that confidentiality statements do not necessarily preclude using any information collected during an inspection for enforcement. The City has updated entrance procedures to reflect this policy.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
10	Advance Surface Finishing's operations log, as explained by the facility representative, does not provide adequate operational data to confirm how much wastewater is generated in a day, how wastewater is being properly treated on that day, if the wastewater is stored for an additional period, or what the actual discharge volume was on a day. The City should require the facility to develop a batch discharge log to clearly document volumes of wastewaters generated, treated, or discharged daily. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	A copy of the 5/2/2011 inspection report documenting the review of treatment and discharge logs is included in Attachment 2 in the 5/27/2011 Response. The facility does log the various wastewaters treated and discharged. At the time of the *7/29/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* included in the *2011 1st Semi-Annual Industrial User Pretreatment Compliance Report* (*7/29/2011 Response*) the facility was an intermittent discharger; discharging continuously some days and not at all on others due to changes in production and the use of ion exchange. The facility was not a true batch discharger and has not been permitted as such. Therefore, the facility was required to collect a 24 hour composite sample as a representative sample. Subsequent to the *7/29/2011 Response*, the facility responded to a 10/27/2011 Compliance Agreement and other enforcement actions issued for violations identified outside of the PCA and PCI by changing its process to a true batch discharging process. The City requested an updated Discharge Permit Application that reflects the change in process. The City will be continuing to review, monitor, and enforce, as necessary, the implementation of the process change.	Completed
11	Advance Surface Finishing's wastewater pipes that convey industrial flows were not labeled. The audit team recommends that the facility properly label wastewater pipes so that industrial flows can be properly identified. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	A copy of the 6/4/2010 inspection report documenting the labeling of pipes is included in Attachment 2 in the *5/27/2011 Response*.	Completed
12	The volume of Advance Surface Finishing's pH alarm was very low, and the audit team could barely hear it. The audit team recommends that the facility increase the volume of the audible alarm used to indicate pH values approaching effluent limits. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	A copy of the 6/4/2010 inspection report where the pH alarms was tested is included in Attachment 2 in the *5/27/2011 Response*.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
13	Advance Surface Finishing and ALSCO did not have any cleaning documentation or calibration records to document proper maintenance of the pH probe. The City should require these facilities to implement a pH logging system to document pH probe cleaning, calibration, and general maintenance. The log should contain pH values, dates, times, and documentation of the person performing the tasks. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	Logs for pH were reviewed for pH probe cleaning, calibration, and general maintenance as documented in 2010 and 2011 inspection reports. Copies of 2/22/2010, 11/23/2010, and 5/2/2011 Advanced Surface Finishing inspection reports are included in Attachment 2 in the *5/27/2011 Response* , and the 3/9/2010 and 2/28/2011 ALSCO inspection reports are included in Attachment 4 in the *5/27/2011 Response* .	Completed
14	The APCT facility representative was confused as to where the correct sampling point for cyanide was. Even through the facility's cyanide sampling location is correct, the auditor strongly recommends that the City review with the facility representative the cyanide wastewater process and sample collection location to ensure that the representative understands the collection location. The collection location should also be noted on the map associated with the facility's fact sheet. The audit team also recommends that the City's industrial pretreatment discharges to the sewer system (i.e., wastewater sample locations). The facility representatives should not be modifying operations that affect the quality of wastewaters discharged to the sewer system without properly notifying the City. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	APCT, Inc. was formerly named Advanced Printed Circuit Technology. In the fourth quarter of 2008, after a name and ownership change, the facility was repermitted as APCT, Inc. The previous facility had an inactive gold line. The new owners wanted to use the gold line and requested a sample location for the line in the permit; however, they were not ready to use the line in 2008 and the first half of 2009 as documented in inspection reports on 3/24/2009 and 6/08/2009. On 9/28/2009, the gold line was put into production. The purpose of the 10/29/2009 Audit inspection was to clarify with the Industrial User the location of the cyanide sample point, as documented in the 10/29/2009 inspection report. City staff did review with the facility representative the cyanide wastewater process and sample collection location and the permit monitoring requirements. The City also discussed the importance of modifications to operations that affect the quality of wastewater discharged to the sanitary sewer. Copies of the inspection reports are included in Attachment 6 in the *5/27/2011 Response* . However, process change communication was an ongoing issue with this industrial user. Therefore, the City issued a Notice of Violation. This Notice of Violation is included in Attachment 2 of the *7/29/2011 Response* . On 8/29/2011, APCT, Inc. notified the City of a significant change. A new permit was issued on 12/7/2011. This permit describes the specific location of the cyanide sample collection point by the tank number.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
15	The APCT facility representative was not knowledgeable of the types of products that are rinsed and cleaned in the *general rinse area* adjacent to the pretreatment area. The auditor recommends that the facility develop a standard for what items are appropriate to be rinsed in the general rinse area so the facility is aware of what waste streams are flowing to its pretreatment system and so that noncategorical waste streams are not being discharged with the categorical waste streams. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	APCT submitted a standard operating procedure for the general rinse area adjacent to the pretreatment area describing what types of products are rinsed and cleaned, and how they monitor and control the work that is performed in this area.	Completed
16	APCT's containment area did not appear to be large enough to contain the contents of the drums. The auditor recommends that the City discuss other means of chemical storage to ensure that chemicals are adequately contained. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City discussed storage evaluations with the City of Santa Clara Fire Department. A copy of their report and recent correspondence with EPA regarding a 2009 investigation is included in Attachment 7 in the *5/27/2011 Response* .	Completed
17	Coast Engraving's sampling methods are insufficient. The City should conduct a follow-up inspection to ensure that the facility is using appropriate sampling methods during its sample collection. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	One of the items discussed at a compliance meeting conducted on 7/8/2011 was the methods used for collecting samples. The Compliance Agreement required the following: submit self monitoring reports for samples collected monthly for three months starting August 2011 for metals, cyanide and total toxic organics using the appropriate EPA methods 608, 624, and 625; submittal by 10/31/2011: procedures for pretreatment system operation and monitoring, an updated solvent management plan that includes all solvents maintained on site, and a slug discharge prevention plan certified by a Professional Engineer; and attendance at the next Industrial Users Academy. A copy of the Compliance Agreement is included in Attachment 4 of the *7/29/2011 Response* . Coast Engraving has responded to the Compliance Agreement by resampling using appropriate sampling methods, and submitting the resulting self monitoring reports. In addition, Coast Engraving has submitted a solvent management plan, a pretreatment system operation and monitoring procedure, and a slug discharge prevention plan. The City has reviewed the submittals and they appear to be complete. The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
18	The HED Battery Corporation facility representatives stated that they had never seen a copy of the facility's permit. The City should ensure that all zero-discharge permittees receive copies of their permits. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	A copy of 3/15/2010 inspection report verifies that the permit was reviewed and discussed. However, HED Battery Corporation has since closed and is no longer in business. A copy of the 3/15/2010 inspection report is included in Attachment 17 of the *5/27/2011 Response* .	Completed
19	During the Jennings Technology Corporation site visit, the auditor noted several areas of concern. The Tetra Tech inspectors strongly recommend that the City follow up with the facility to ensure that all the deficiencies noted during the inspection are corrected. Therefore, the City should conduct a follow-up visit with Jennings Technology to ensure that all the areas of concern observed during this site visit are corrected or resolved. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	On 10/27/2009 the City issued a Notice of Violation for the bypassing, falsification of information, prohibition of accidental discharge, failure to notify significant change, and prohibition on use of diluting waters violations found during 10/19/2009 inspection and were continuing at the time of the PCA. The Notice of Violation required Jennings Technology Corporation to take a number of actions. In addition, the City had a Compliance Meeting with the facility manager for Jennings Technology Corporation on 1/12/2010 to discuss the Notice of Violation and develop a Compliance Agreement. The Compliance Schedule included in the Compliance Agreement summarized items already required in the Notice of Violation and documented the items Jennings Technology Corporation already responded to on 11/11/2009. These items included: • Submittal of updated permit application, permit fee, and slug prevention plan; • Addition of foot pedal controlled rinse shutoffs to the cyanide process line; • Repair of alarm and pH recording equipment; • Removal of hoses; and • Completion of annual employee training. In addition to the requirements already required and completed by the Industrial User, the City required Jennings Technology Corporation staff to attend the 4/28/2010 Industrial User Academy, which the Industrial User also completed. Since most items were already completed, the City conducted a follow up inspection on 1/15/2010 to verify the completion of the compliance schedule items. There was no foaming in the sample point at the time of the inspection. The foaming was caused by too low pH in a process tank upstream of the pretreatment system and that had since been adjusted. Copies of the 1/15/2010 inspection report, the City sampling reports, the Enforcement Actions including the Notice of Violation, the Administrative Citation, the Compliance Agreement, and the Significant Non-Compliance article from 2/24/2010 San Jose Mercury News, and the title pages of the Jennings Technology Corporation Slug Control Plan are included in Attachments 18, 19, 20, and 21, respectively of the 5*/27/2011 Response* . The Industrial User also installed a sign for the hand sink discussed in the PCA stating- "No Disposal of Chemicals in This Sink," as verified during 3/28/2011 inspection. A copy of the inspection report is included in Attachment 18 of the *5/27/2011 Response* .	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
20	Micrel plans to expand its dry operations over the 2009 Christmas break. The audit team recommends that the City request the facility to give a formal submittal of the proposed changes before the Christmas break. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The original reference was made for the Christmas of 2009, however, during the 5/2/2011 inspection, the inspector discussed with Micrel, Inc. if there were any process changes that the City was not aware since 2009. The only change in process has been the expansion of a developer process that did lead to a minimal increase in process flow. However, this was not significant enough to require a permit amendment.	Completed
21	Micrel has recently modified its pretreatment system in an effort to eliminate pH exceedances. The audit team recommends that the City request a timeline for the facility to formally modify its pretreatment system's standard operating procedures. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	During an inspection on 5/2/2011, the standard operating procedures for the pH system and responding to pH exceedances were reviewed. A copy of the 5/2/2011 inspection report is included in Attachment 26 of the *5/27/2011 Response*.	Completed
22	Micrel does not have the ability to shut down or divert flows to holding tanks if the pH of the wastewater drops below the permitted limit of 6.5 standard units (S.U.). The City should evaluate whether the pH alarm set point of 6.5 S.U. is adequate to ensure that effluent will remain in compliance during peak flows. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The actual local permit limit is 6.0 S.U. not 6.5 S.U., as stated in the comment. Micrel submitted a letter detailing their process for responding to a pH alarm, and evaluating the set point for triggering the alarm. A copy of this letter is included in Attachment 5 of the *7/29/2011 Response*. The City has also required Micrel, Inc. to develop a slug control plan and a copy of the title page is included in Attachment 27 of the *5/27/2011 Response*.	Completed
23	At Mohawk Packing, the auditor noticed that the boiler chemicals are stored in a drum in the boiler room and are not secondarily contained (a floor drain is in the room). Therefore, the auditor recommends that the City inform the discharger of the secondary containment requirements of all chemicals, and the City should conduct a follow-up inspection to ensure that the facility is properly storing all chemicals. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City verified appropriate secondary containment during 3/15/2010 inspection. A copy of the inspection report is included in Attachment 29 of the *5/27/2011 Response*.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
24	At Prudential Overall Supply, the auditor noted a hand washing sink in the chemical storage area. The audit team recommends that the City require the facility to place a sign above the sink to warn against dumping any spent or unused chemicals down the drain. In addition, the audit team recommends that the City require the facility to conduct periodic training for employees on the proper chemical handling and disposal practices. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The Industrial User installed a sign in English and Spanish - "No Disposal of Chemicals in This Sink," as verified during 1/5/2010 inspection. A copy of the inspection report is included in Attachment 32 of the *5/27/2011 Response*.	Completed
25	At Solopower, Inc., the auditor discussed permanently capping or plugging the facility's severed connection to the City's POTW system to ensure that discharges have been eliminated. The auditor recommends that the City follow up with facility to ensure that the facility has adequately capped or plugged its industrial wastewater connection to the City's POTW. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The Industrial User does not want to cap permanently the discharge line, since the facility does plan to make changes to its process and discharge. However, it does have an adequate cap to prevent discharge from this sample point. Also, they are required to submit certified self monitoring reports with zero discharge. However, they are required to notify us if they plan to discharge in the future with a written permit application, and the connection will be checked on all inspections.	Completed
26	The THAT Corporation representative was unaware of how the water softener is maintained or where the brine regenerate water is disposed of. The audit team recommends that the City follow up with the facility to review the facility's water softener regeneration operation and discharge location. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City confirmed that That Corporation discharges the water softener and reverse osmosis brine water in the acid waste neutralization system at an inspection on 7/19/2011. A copy of the 7/19/2011 inspection report is included in Attachment 6 of the *7/29/2011 Response*. The City then reviewed the current flow information and determined that the facility has undergone a significant change due to increasing flow rates identified in the March 2011 and September 2011 self monitoring reports. The amended Industrial Wastewater Discharge Permit includes revised TTO limits using the combined waste stream formula. A copy of the updated Discharge Permit is included as Attachment 1 to the 2009 PCA and 2011 PCI report responses included in the "Program Changes" section of the *2011 Annual Industrial User Pretreatment Compliance Report for the San Jose/Santa Clara Water Pollution Control Plant*.	Completed

Table 2: 2009 Pretreatment Compliance Audit Summary Report - Recommendations

#	Description	Response	Target
27	During the Xstrata Recycling site visit, there were no discussions about wet scrubbers, which are commonly used in processes such as those in operation at the facility. The auditor recommends that the City determine if the facility uses any wet scrubbers in any of its processes. If the facility does use wet scrubbers, the City should also discuss disposal practices for the wastewater generated from the wet scrubber. (Section 9.3, Nondomestic User Site Inspections Conducted during the Audit)	The City reviewed the flow at Xstrata Recycling and found that the wet scrubber wastewater is either recirculated back into the scrubbers or manifested for disposal offsite as hazardous waste, as appropriate for a zero categorical discharge facility.	Completed
28	The ERP does not define the term prolonged periods. Therefore, the audit team strongly recommends that the City establishes a specific definition of prolonged periods so that the City can take consistent enforcement actions. (Section 10.1, Deficiencies with the ERP)	The ERP does escalate enforcement based on various periods specific to each type of violation. The periods are defined in the tables listing each violation, located in Appendix A of the ERP.	Completed
29	The audit team was unable to find adequate documentation in Coast Engraving's file to evaluate the facility's correct categorical classification. The auditors strongly recommend that the City research the history of the facility and resolve the missing information that could not be found in the files. Furthermore, the auditors recommend that the City maintain a comprehensive history of all SIUs to ensure that the City's classification rationale can be validated. (Section 11, Data Management)	The City finds that Coast Engraving is properly classified as a new source metal finisher under 40 CFR 433.17. Coast Engraving was a categorical zero discharger that began operating under a discharge permit in 2010. Although the process at Coast Engraving remains unchanged, their change in operations, to pretreat wastewater and discharge to the sanitary sewer instead of hauling these wastes off site, afforded them the opportunity to install the Best Available Technologies pretreatment for permitted discharge to the sanitary sewer.	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
1	As required at 40 CFR 403.8(f)(1)(iii)(B)(1), permits must contain a statement of duration, which should include an effective date and an expiration date. A number of the permits reviewed during the inspection contain a permit effective date that predates the issuance date. The City is required to implement the appropriate procedural changes to ensure that permits are issued before their effective date. (Section 6.1, Permit Issuance)	The City has implemented steps to ensure that permits issued do not have an expiration prior to the issuance date. The City began providing more outreach to industrial users and improving the permit tracking process. The City has revised its permitting procedures to ensure alignment of permit expiration and reissuance, and this practice has been applied to all permits issued since April 2011.	Completed
2	Inspection procedures were found to greatly vary between the different City inspectors. A component of the inspection was to observe City inspectors performing their typical annual inspection procedures. Some of the City inspections thoroughly covered, reviewed, and inspected facility records, processes, pretreatment systems, and monitoring devices, whereas other inspections did not. For example, the contract inspection team identified a number of items of concern at Pyramid Circuits, including the storage of chemicals in relation to drains and the pretreatment system, the overall operation of the pretreatment system (i.e., the method for pH adjustment), the discharge of rainwater from the chemical storage area to the pretreatment system, general housekeeping, and incorrect pretreatment schematics. Thorough inspection procedures by the City should have identified and addressed those items. The federal regulations at 40 CFR 403.8(f)(2) require the City to develop and implement procedures to ensure compliance with the requirements of the pretreatment program. The City is required to implement thorough inspection procedures at all inspected industries. (Section 8.2,Compliance Inspections)	The City has revised its inspection procedures and other mechanisms to support review of pretreatment systems, onsite records, flow schematics documentation, chemical storage and its relationship to drains in the pretreatment system and rainwater, general housekeeping, and monitoring equipment maintenance documentation requirements. Regarding Pyramid Circuits, the City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting to address these specific issues. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 from *5/27/2011 Response* . Also the City contacted the City of Santa Clara Fire Department Hazardous Materials Section to follow up on a 4/7/2011 investigation they conducted with EPA and State Board representatives. Mr. Hansen, City of San Jose Hazardous Materials Inspector normally responsible for inspecting Pyramid Circuits, provided the City a draft letter documenting the deficiencies found during the inspection, a 5/13/2011 Pre-Citation Notice, a 3/24/2010 Notice to Comply, and a copy of 9/11/2009 inspection report. Copies of these documents are included in Attachment 35 from *5/27/2011 Response* .	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
3	Some of the hazardous waste containers were not within secondary containment at M-Pulse Microwave. The City is required to reevaluate the facility's slug control plan to ensure that the facility's chemical and hazardous waste management practices do not propose a threat to the POTW. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. An element of the Agreement includes requiring a slug plan for this facility to ensure that the facility's chemical and hazardous waste management practices do not pose a threat to the San Jose/Santa Clara Water Pollution Control Plant. In addition, the City has referred the facility to the County of Santa Clara Department of Environmental Health Hazardous Material Compliance Division. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 from 5/27/2011 Response and a copy of the 4/29/2011 e-mail referring M-Pulse Microwave to the County is included in Attachment 25 from 5/27/2011 Response. M-Pulse Microwave responded to the Compliance Agreement by submitting a slug plan on 8/25/2011 that appeared to be complete. A copy of the first page of the slug plan is included in Attachment 2 from the updated *12/20/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* (*12/20/2011 Response*). Upon inspection, the City did identify discrepancies with this plan and is following up with enforcement actions. The City will continue to review, monitor, and enforce, as necessary, the implementation of the updated slug plan.	Completed
4	The January 11, 2011, manifest at M-Pulse Microwave summarizes the disposal of eleven 55-gallon drums, two 15-gallon drums, and one 5-gallon drum, as well as vermiculite, 409 cleaner, and cleaning rags. The manifest also shows an additional charge for a "Supervisor" to "pack and sort fuming drums." Based on the observations made concerning the facility's hazardous waste management practices, the "fuming" of drums, and the number of small volumes of hazardous waste throughout the facility, there appears to be a risk to employee safety and a potential for noncompliance with environmental regulations. The City is required to reevaluate the facility's slug control plan to ensure that the facility's chemical and hazardous waste management practices do not propose a threat to the POTW. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. An element of the Agreement includes requiring a slug plan for this facility to ensure that the facility's chemical and hazardous waste management practices do not pose a threat to the San Jose/Santa Clara Water Pollution Control Plant. In addition, the City has referred the facility to the County of Santa Clara Department of Environmental Health Hazardous Material Compliance Division. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 from 5/27/2011 Response, and a copy of the 4/29/2011 e-mail referring M-Pulse Microwave to the County is included in Attachment 25 from 5/27/2011 Response. M-Pulse Microwave responded to the Compliance Agreement by submitting a slug plan on 8/25/2011 that appeared to be complete. A copy of the first page of the slug plan is included in Attachment 2 from the *12/20/2011 Response*. Upon inspection, the City did identify discrepancies with this plan and is following up with enforcement actions. The City will continue to review, monitor, and enforce, as necessary, the implementation of the updated slug plan.	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
5	The inspection team was informed by the facility representative at M-Pulse Microwave that soap bubbles sometimes blind the pH probe, which results in the discharge valve closing. This situation could be an indicator that the probe is not operating properly. The City is required to have the facility ensure that its entire pretreatment system is designed and operating properly. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. An element of the Agreement includes requiring the facility to have a third party pretreatment system evaluation by professional engineer. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 from 5/27/2011 Response. In response to the Compliance Agreement, M-Pulse Microwave submitted the following. In 8/25/2011, M-Pulse Microwave submitted a Neutralization System Standard Operating Procedure that describes among other things, cleaning pH probes prior to calibration. In addition, on 10/17/2011, M-Pulse Microwave submitted a "Tank & Containment Audit" report that included an evaluation of the treatment system, with recommended upgrades to the monitoring system, which appear to be complete. A copy of the current procedure and the first page of the 10/17/2011, "Tank & Containment Audit" are included in Attachment 2 from the *12/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed
6	The facility representative at M-Pulse Microwave stated that new pH probes are not calibrated when installed. The City is required to have the facility ensure that all instrumentation is properly installed and calibrated as required. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. Elements of the Agreement include requiring the facility to have a third party evaluation of the pretreatment system (the pretreatment system includes the pH monitoring system) by a professional engineer, requiring the facility to calibrate the pH meter, and providing a log of pH maintenance activities including calibration. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 from 5/27/2011 Response. M-Pulse Microwave responded to the Compliance Agreement by submitting on 8/25/2011 an example pH calibration sheet and a Neutralization System Standard Operating Procedure that describes among other things, calibration of the pH system. Copies of the pH calibration sheet and procedure are included in Attachment 2 from the *12/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
7	At M-Pulse Microwave, the inspection team observed that some of the wiring associated with the operation of the pretreatment system components (e.g., pump motor, control panel) was rusted, in various states of disrepair, and in some case not connected to the appropriate locations. The City is required to have the facility ensure that its entire pretreatment system is designed and operating properly.	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. An element of the Agreement includes requiring the facility to have a third party pretreatment system evaluation by a professional engineer. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 from 5/27/2011 Response. M-Pulse Microwave responded to the Compliance Agreement by submitting on 10/17/2011, a "Tank & Containment Audit" report that included an evaluation of the treatment system, with recommended upgrades to the monitoring system. A copy of the current procedure and the first page of the 10/17/2011, "Tank & Containment Audit" are included in Attachment 2 from the *12/20/2011 Response*. The City has reviewed the submitted product and is in the process of updating the Compliance Agreement to include an implementation plan. The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed
8	The chemical storage area at Pyramid Circuits is outside, uncovered, and bermed. The facility representative stated that the facility pumps collected rainwater from the chemical storage area sump to the pretreatment system sump for treatment and discharge to the POTW. Section 15.14.545 of the City's Sewer Use Regulations states that "No person shall discharge, cause, allow or permit any stormwater, surface water or roof runoff, to be discharged into the sanitary sewer system or any part thereof." The City is required to ensure that stormwater is not being discharged to the sanitary sewer system as required in section 15.14.545 of the City's Sewer Use Regulations. It should also be noted that the facility's pretreatment collection sump is located outside and covered with a grate, thereby also allowing stormwater to enter the sanitary sewer via the pretreatment system. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. An element of the Agreement included requiring the facility to have a third party evaluation of operations by a professional engineer that includes investigating rerouting of the stormwater discharges. Replumbing or covering the chemical storage area was not feasible for this facility. The City recognizes that protecting discharges to the storm sewer system may require discharging contaminated stormwater to the sanitary sewer for some facilities. Therefore, the City updated its SUO section 15.14.545 to allow permitted discharge of contaminated stormwater to the sanitary sewer, when necessary, to ensure the best protection for the environment. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 from 5*/27/2011 Response*.	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
9	The pH recorder at Pyramid Circuits for the pH meter in the sample tank had a calibration sticker from CT Services; however, the calibration date and next calibration date were faded and could not be read. The pH recorder had a high set point of 14.1 standard units (S.U..) and a low set point of 14.0 S.U.. Part B of the facility's permit requires that "all wastewater pretreatment and monitoring devices shall be properly operated and maintained in proper working condition." The City is required to ensure that the pH meter has been properly calibrated and the set points are properly maintained. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. Elements of the Agreement include requiring the facility to have a third party evaluation of its pretreatment system (includes pH monitoring system) by a professional engineer, to calibrate the pH meter, and to provide a log of pH maintenance activities including calibration. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 from 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting a permit application, standard operating procedures for wastewater treatment and batch treatment systems, a report evaluating the pretreatment and monitoring system, and a slug plan. Their submissions appear to be complete. The permit issued on 10/24/2011 included a compliance schedule for implementation of the upgraded system by 12/24/2011, and re-evaluation of the upgraded treatment system by 3/24/2012. The City extended these dates to 2/29/2012 and 5/31/2012, respectively. The facility implemented the upgraded system on 2/29/2012 and submitted the resulting reevaluation on 5/30/2012. Copies of the procedures, first page of the initial pretreatment system evaluation, and the first page of the slug plan are included in Attachment 4 and a copy of the Discharge Permit is included in Attachment 3 from the 1*2/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed
10	The 2008 permit application for Pyramid Circuits contains a schematic flow diagram of the pretreatment system. This schematic was also posted in two locations in the pretreatment area at the facility. It was observed during the facility inspection that the schematic is incorrect. The City should have recognized this incorrect pretreatment diagram during its facility inspections and its review of the permit application. The federal regulations at 40 CFR 403.8(f)(2) require the City to develop and implement procedures to ensure compliance with the requirements of the pretreatment program; therefore, the City is required to develop and implement procedures to ensure that all document received from industrial users are accurate. (Section 8.4, Requesting, Receiving, and Analyzing Reports)	The City revised its permit application submittal procedures and is evaluating other mechanisms to support accurate submittals of flow schematics and other documents. In addition, the City has updated its inspection report procedures and is instituting regular training sessions for all inspectors. Also, the City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. An element of the agreement includes requiring the facility to submit an updated flow diagram. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 from *5/27/2011 Response* .	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
11	The federal pretreatment regulations at 40 CFR 403.12(g)(3) require that sampling protocols (including appropriate preservation) be used as specified in 40 CFR Part 136. The federal regulations at 40 CFR Part 136, Table II, require that pH be analyzed within 15 minutes of collection. A number of the SMRs and chain-of-custody reports in the files reviewed did not state the time when wastewater for pH analysis was collected and analyzed, or whether the analysis was completed in the field; therefore, whether the requirements at 40 CFR Part 136 had been met could not be determined. The City is required to ensure that all monitoring events meet the requirements at 40 CFR Part 136. (Section 8.4, Requesting, Receiving, and Analyzing Reports)	The City trained inspectors in January 2011 to implement a new Self Monitoring Report Checklist to assist and document inspector review of self monitoring reports, including specifically reviewing pH hold time. A copy of the Self Monitoring Report Checklist in included in Attachment 41 from *5/27/2011 Response* .	Completed
12	In the SMR received by the City, no "Date Received" was included for the Philips Lumileds Lighting Company's monitoring event on October 17, 2009. Therefore, whether the City had received the SMR by the permit-required due date, October 31, could not be determined. The federal regulations at 40 CFR 403.8(f)(2) require the City to develop and implement procedures to ensure compliance with the requirements of the pretreatment program; therefore, the City is required to develop and implement procedures to ensure that all documents are properly received. (Section 8.4, Requesting, Receiving, and Analyzing Reports)	Phillips Lumileds Lighting Company did submit a self monitoring report in October 2009 with a sample date in June 2009 within the appropriate compliance timeframe for that time period. However, Phillips Lumileds did sample a month too early for the April 2010 self monitoring compliance reporting period. The inspector at the time, now retired, confused the six month compliance period for the self monitoring report due on April 2010 as being October 2009 to March 2009 instead of November 2009 to April 2009. The City issued a Warning Notice in response to the violation. A copy of the 5/24/2011 Warning Notice is included in Attachment 31 from *5/27/2011 Response* . The City also revised self monitoring report procedures in response to the upgrade of the program data management system and these procedure updates provided clarified compliance periods.	Completed

Table 3: 2011 Pretreatment Compliance Inspection Report - Requirements

#	Description	Response	Target
13	The City's standardized checklist, referred to as the "Evaluation Checklist for Slug Discharge Prevention Plan Requirement," was reviewed. During the facility inspections, the contractor inspection team asked to review various items from the checklist that the City inspectors had indicated/documented were present and implemented. It was found that a number of items indicated as present and implemented on the checklist were neither available nor implemented at Pyramid Circuits. Based on the discrepancies between the City's checklist and the observations, the City is required to reevaluate Pyramid Circuits' need for a slug discharge control plan and thoroughly and accurately document the checklist items. (Section 8.5, Slug Discharge Control Plans)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. An element of the Agreement includes requiring the facility to complete a slug plan. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 from 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting a slug plan on 10/26/2011, which appeared to be complete. A copy of the front page of this slug plan is included in Attachment 4 from the *12/20/2011 Response*. The City will continue to review, monitor, and enforce, as necessary, the implementation of the slug plan.	Completed
14	The contract inspection team asked to review facilities' accidental spill logs and batch discharge logs and observed other conditions indicated on the City's "Evaluation Checklist for Slug Discharge Prevention Plan Requirement." It was found that facilities did not have or had not implemented some of the items that the City had documented the facilities as having. Therefore, the City is required to accurately document all items on its checklist so that the City can adequately determine whether a facility needs a slug discharge control plan. (Section 8.5, Slug Discharge Control Plans)	The City, with consultant assistance, evaluated its existing slug discharge evaluation process and training. The consultant also benchmarked the City's program against five other California jurisdictions. The conclusions of this analysis were used to develop a new and more comprehensive slug discharge evaluation procedure. This procedure was finalized on 10/31/2011. A new checklist was also developed, for more accurate documentation, with input from staff, and finalized in December 2011. In January 2012, the City will begin using the new procedures for facility evaluations as part of the SIU/CIU permitting process and annual inspections.	Completed

Table 4: 2011 Pretreatment Compliance Inspection Report - Recommendations

#	Description	Response	Target
1	Based on observations at Pyramid Circuits, it is strongly recommended that the City require the facility to develop and implement a slug discharge control plan. (Section 8.5, Slug Discharge Control Plans)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. An element from the Agreement includes requiring the facility to submit a slug plan. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 in the 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting a slug plan on 10/26/2011, which appeared complete. A copy of the front page of this slug plan is included in Attachment 4 from the updated *12/20/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* (1*2/20/2011 Response*). The City will continue to review, monitor, and enforce, as necessary, the implementation of the slug plan.	Completed
2	It is strongly recommended that the City modify the permit for Philips Lumileds Lighting Company to cease or minimize effluent flow during SSO events to prevent excess discharge from the SSO. (Section 6.2, Sanitary Sewer Overflows)	The recent sanitary sewer overflow does not appear to have been caused by Phillip Lumileds Lighting Company. However, the City met with Phillips Lumileds Lighting Company on 7/14/2011 to discuss if there are any potential mechanisms for minimizing the impact of sanitary sewer overflows. This facility is a 24-hour, 7-days-a-week operation with little opportunities to reduce flow rates. The facility can shut down their operations and divert flows if the facility is responsible for an overflow. The facility is also updating their notification procedures for sanitary sewer overflows so that their security guards directly notify the City for all sanitary sewer overflows. The City has also responded to the sanitary sewer overflow by installing a SmartCover in the manhole on Trimble Road adjacent to Philips Lumileds. The SmartCover device will detect and send preemptive signals to maintenance personnel if sewage flow level starts rising above a pre-set level in the manhole. The City also cleaned debris from a siphon located downstream from the IU and the sanitary sewer segments are now on a six month cleaning cycle.	Completed

Table 4: 2011 Pretreatment Compliance Inspection Report - Recommendations

#	Description	Response	Target
3	The inspection team asked to review the accidental spill log at Arnold's Metal Finishing, as indicated on the City's "Evaluation Checklist for Slug Discharge Prevention Plan Requirement." The facility representative stated that the facility has "never had one." The City inspector recommended that the facility develop an accidental spill log and keep it on top of the facility's spill kit. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	Surveillance sampling conducted at Arnold's Metal Finishing resulted in several nickel violations. These violations were addressed with Notices of Violations and a Compliance Agreement from a 3/10/2011 Compliance Meeting. An element from the Agreement includes requiring the facility to submit a slug plan that will contain a procedure for spill response, including the maintenance of an accidental spill log. A Copy of the Notices of Violation and the 3/10/2011 Compliance Meeting were included in Attachment 8 in the *5/27/2011 Response*. At a permit inspection conducted on 7/11/2011 the City was able to confirm that the facility is maintaining a spill log. The spill log fulfills the recommended action. Subsequently, Arnold's Metal Finishing did not submit a slug discharge prevention plan and the City issued a Notice of Violation. A copy of the inspection report and Notice of Violation are included in Attachment 3 of the *7/29/2011 San Jose/Santa Clara Water Pollution Control Plant 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Reports Response* included in the *2011 1st Semi-Annual Industrial User Pretreatment Compliance Report* (*7/29/2011 Response*). Arnold's Metal Finishing did respond to the Notice of Violation by submitting a slug plan. Upon further review of the submittal and in response to violations identified outside of the PCI, the City issued additional enforcement actions including requiring submittal of an updated and more complete slug management plan. The City will continue to review, monitor, and enforce, as necessary, the implementation of the slug plan.	Completed
4	M-Pulse Microwave had many hazardous waste containers with dates exceeding the 90-day hold requirements and some of the hazardous waste containers were not within secondary containment. The City should forward the findings of the inspection (i.e., questionable hazardous waste management practices) to the proper authorities for evaluation with respect to safety and regulatory compliance. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City has referred information regarding M-Pulse Microwave to the County of Santa Clara Department of Environmental Health Hazardous Material Compliance Division. A copy of the e-mail sent to the County is included in Attachment 25 in the *5/27/2011 Response*.	Completed

Table 4: 2011 Pretreatment Compliance Inspection Report - Recommendations

#	Description	Response	Target
5	The January 11, 2011, manifest at M-Pulse Microwave shows an additional charge for a "Supervisor" to "pack and sort fuming drums." Based on the observations made concerning the facility's hazardous waste management practices, the "fuming" of drums, and the number of small volumes of hazardous waste throughout the facility, there appears to be a risk to employee safety and a potential for noncompliance with environmental regulations. The City should forward the findings of the inspection (i.e., "fuming drums") to the proper authorities for evaluation with respect to safety and regulatory compliance. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City has referred the information regarding M-Pulse Microwave to the County of Santa Clara Department of Environmental Health Hazardous Material Compliance Division. A copy of the e-mail sent to the County is included in Attachment 25 in the *5/27/2011 Response*.	Completed
6	The inspection team asked the facility representative at M-Pulse Microwave if the facility has a written SOP for its pretreatment system. The facility does not. It is strongly recommended that the facility be required to develop a SOP for its pretreatment system. The SOP should include the regular calibration of the pH probe on a standardized log form or log book. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, M-Pulse Microwave at a 5/12/2011 Compliance Meeting. Elements of the Agreement include requiring the facility to have a third party evaluation of the pretreatment system (the pretreatment system includes the pH monitoring system) by a professional engineer, requiring the facility to calibrate the pH meter, and providing a log of pH maintenance activities including calibration. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 24 in the 5/27/2011 Response. M-Pulse Microwave responded to the Compliance Agreement by submitting its Neutralization System Standard Operating Procedure, which appeared complete. The procedure includes a description of regular calibration of the pH probe and a sample pH calibration log was also included in the submittal. Copies of the sample pH calibration sheet and procedure are included in Attachment 2 from the 1*2/20/2011 Response*. The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed

Table 4: 2011 Pretreatment Compliance Inspection Report - Recommendations

#	Description	Response	Target
7	The State Water Board inspector asked the Pyramid Circuits representative and the City inspector if there was a standard operating procedure (SOP) for the pretreatment system. The facility representative was unaware of an SOP and the City inspector thought that there might be one in the file at the City's offices. The inspection team was unable to find a pretreatment SOP but was able to find the same incorrect pretreatment flow schematics that were posted in the facility's pretreatment area. It is recommended that the facility develop a written SOP for the operation of the pretreatment system and the batch discharge practices. The SOP should address the facility's pH adjustment practice described below. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. The Compliance Agreement includes requirements for the facility to have a third party registered engineer develop a written SOP for the operation of Pyramid Circuits pretreatment system and batch treatment and discharge practices, following a full an evaluation of the pretreatment system operation, capacity, and effectiveness. Other elements of the Compliance Agreement include requirements for the facility to calibrate the pH meter and maintain a log of pH maintenance activities, including the calibration. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 in the 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting on 10/26/2011 standard operating procedures for the wastewater treatment system and batch treatment system, which appeared complete. Copies of the procedures are included in Attachment 4 from the *12/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed
8	The pH in the pretreatment collection sump at Pyramid Circuits is adjusted by manually tipping a 5-gallon container of caustic soda on its side, opening a spigot, and allowing the chemical to drip or pour into the sump. Based on this practice and the chemical storage encompassing the pretreatment's collection sump, it is strongly recommended that the City require the facility to develop a slug discharge control plan and that a more precise method for adding treatment chemicals be developed by the facility's operations staff. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. Elements of the Agreement requires the facility to provide a slug plan and an evaluation of the pretreatment system by a professional engineer with a schedule for any upgrades. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 in the 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting a permit application, standard operating procedures for wastewater treatment and batch treatment systems, a report evaluating the pretreatment and monitoring system, and a slug plan. The City reviewed the submittals for completion. The submission appeared complete. The permit issued on 10/24/2011 included a compliance schedule for implementation of the upgraded system by 12/24/2011, and re-evaluation of the upgraded treatment system by 3/24/2012. The City extended these dates to 2/29/2012 and 5/31/2012, respectively. The facility implemented the upgraded system on 2/29/2012 and submitted the resulting reevaluation on 5/30/2012. One of the recommendations to be implemented includes installation of an automatic pH adjustment system. Copies of the procedures, first page of the initial pretreatment system evaluation, and the first page of the slug plan are included in Attachment 4, and a copy of the Discharge Permit is included in Attachment 3 from the *12/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed

Table 4: 2011 Pretreatment Compliance Inspection Report - Recommendations

#	Description	Response	Target
9	The inspection team asked to see the Batch Discharge Log at Pyramid Circuits for a review of documentation structure and operational practices. According to the City's "Evaluation Checklist for Slug Discharge Prevention Plan Requirement," the facility's staff maintained a batch discharge log. The facility representative stated that he was "unaware of a log." The City inspector thought that the facility "used to have one." It is recommended that the facility develop and implement a batch discharge log. Refer to section 8.4 of the Summary Report for a further discussion. (Section 8.3, Nondomestic User Site Inspections Conducted during the Inspection)	The City issued a Notice of Violation to, and developed a Compliance Agreement with, Pyramid Circuits at a 5/12/2011 Compliance Meeting. Elements of the Agreement include requiring a pretreatment system evaluation, and development of pretreatment standard operating procedures (batch discharge logs are part of the pretreatment system operation) by a professional engineer. Copies of the Notice of Violation and Compliance Agreement are included in Attachment 34 in the 5/27/2011 Response. Pyramid Circuits responded to the Compliance Agreement by submitting on 10/26/2011 a standard operating procedure for the Batch Treatment System. This procedure describes in detail the logging of each treated and disposed batch. A copy of the procedure is included in Attachment 4 from the *12/20/2011 Response* . The City will continue to review, monitor, and enforce, as necessary, the implementation of these products.	Completed

Table 5: July 27, 2012 Updated Combined 2009 Pretreatment Compliance Audit and 2011 Pretreatment Compliance Inspection Response List of Attachments

Attachment #	Facility Name	Type of Document	Dates and Description	PCA Requirement	PCA Recommend	PCI Requirement	PCI Recommend
1	Jennings Technology Corporation	Permit Factsheet	7/24/2012 Fact sheet	6			

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

Permit Fact Sheet

POTW: San Jose/Santa Clara Water Pollution Control Plant

Part I General Information

Industry Name:	Jennings Technology Corporation	Facility ID:	60247
Owner or Responsible Managing Employee:	Bob Thompson, Facilities Manager 408-282-0398		
Discharge Address:	970 McLaughlin Ave.		
City, State, Zip:	San Jose, CA 95122		
Phone:			
Mailing Address:	970 McLaughlin Ave		
City, State, Zip:	San Jose, CA 95122		

Permit:

Permit Number: SJ-634B

Effective Date: 09/01/2012 Expiration Date: 08/31/2017

Permit Type: New Issue

Sewer Connections:

Number of Process Connections:	1	Action:	Paid in Full		
Number of Sanitary Connections:	1	Allotment:	214,812	STP Fees Paid:	N/A
Date current operations began:	08/01/1944	Date Pretreatment began:		08/01/1980	
Date construction began:		Date of Initial Discharge:		08/01/1944	

STP Discussion:

Note: All connection locations must be documented in Part II C.

Facility History:

None

Compliance:

Jurisdictional area: City of San Jose

Comments: Jennings Technology has an x-ray processor that discharges industrial wastewater. This source of wastewater was not included in their previous permit applications. A new permit application was submitted to cover this Significant Change to Jennings permit, and a new permit is being issued to account for this change. In addition, Jennings is now classified as a New Source and the categorical limits are different. With the Copper Forming limits being based on production, a recalculation of the final limits was completed using recent production data. The production based monthly average limit for TTOs is below background TTO levels in the source water. After consultation with EPA Region 9 staff, their recommendation was to implement the Pretreatment Streamlining waiver for pollutants not present. San Jose has submitted a notification to implement the pretreatment streamlining changes and is awaiting approval from local Regional Board and EPA. Once approved, Jennings will request a waiver of sampling for pollutants not present for TTOs. If the sample results establish that TTOs are not added to the water during any of Jennings' processes, the monitoring requirements for TTOs will be waived.

Compliance Status:

Year	Quarter	Compliance Status

Number of violations in the last 12 Months: 0 Number of Compliance Meetings: 0

Enforcements issued on violations occurring in the last 12 months

Enf #	Issued On	Comments

Permit Compliance Information:

Violation History:

Date	Parameter/Violation	Concentration	Permit Limit	Violation Explanation	Enf #

Part II Basis for Permit

A. Sample Locations

Permit No.	Sample Point	Federal Category	Local Jurisdication
SJ-634B	01 - Final Sample Point	40 CFR 468 Subpart A	City of San Jose Municipal Code Chapter 15.14
SJ-634B	01 - Final Sample Point	40 CFR 433 Subpart A (No CN)	City of San Jose Municipal Code Chapter 15.14
SJ-634B	02 - Federal Cyanide Sample Point	40 CFR 433 Subpart A (CN Only)	Include on annual

B. Analytical Data Summary for last 12 months

Sample Loc	Sample #	Sample Date	Parameter	Result	Units	Sample Type	Source

C. Plant Layout

See Permit File

D. Pollutant Loading

See Permit File

Part III Operation Detail

General Description of Operation: Manufacturing of vacuum and gas-filled capacitors and relays, vacuum interrupters, contactors, and coaxial relays.

Categorical Determination: Jennings Technology Corporation forms copper parts using dies and presses. They assemble the copper parts with other work pieces and perform plating on the pieces and assemblies. The plating and other aqueous processes associated with the copper parts are regulated under the Copper Forming category. The plating of the other parts are regulated under the Metal Finishing category. Jennings Technology has operated at this location since the 1940s, performing the same type of work. The copper forming presses have been in use since that time. However, they have changed their wet processes over time and added additional pretreatment processes since 1990. The plating lines were modified for water conservation, tanks were moved and processes were added in the plating room since the new source standards were in place (1982). A summary for Jennings process and pretreatment changes is attached. They are considered a new source. Jennings Technology will be regulated under the New Source Metal Finishing and New Source Copper Forming categories under 40CFR433.17 and 40CFR468.15. Jennings Technology performs operations defined as Pickling, Pickling rinsing, Pickling Fume Scrubbing, Tumbling, and Miscellaneous under the Copper Forming category, 40CFR468.15(k),(m),(n),(o),(q).

Categorical Processes:

Process Name	Startup Date	Max Daily Flow	Avg Daily Flow	Category
Copper Forming	3/9/11	7,947 GPD	3,977 GPD	40 CFR 468 Subpart A
Description/Comments: Copper parts are formed by dies in hydraulic presses				
Metal Finishing	3/9/11	7,103 GPD	3,555 GPD	40 CFR 433 Subpart A (No CN)
Description/Comments: Nickel, cadmium, chromium, and silver-cyanide plating is performed				
Metal Finishing	3/9/11	1,900 GPD	979 GPD	40 CFR 433 Subpart A (CN Only) - Include on annual
Description/Comments: Nickel, cadmium, chromium, and silver-cyanide plating is performed				

Non-Categorical Processes:

Process Name	Startup Date	Max Daily Flow	Avg Daily Flow
		N/A	N/A
Description/Comments:			

Part IV Discharge Points

Categorical Discharge Points: 2

Sample Point 01 - Final Sample Point

Flow Stream:	Metal Finishing
Average Daily Flow:	3,555 GPD
Maximum Daily Flow:	7,103 GPD
Frequency of Discharge	Continuous
Description of all Processes contributing to this Wastestream:	Silver, cadmium, chromium, nickel plating.
Description of all dilution streams:	None
Flow Stream:	Copper Forming
Average Daily Flow:	3,977 GPD
Maximum Daily Flow:	7,947 GPD
Frequency of Discharge	Continuous
Description of all Processes contributing to this Wastestream:	Copper forming operations include pickling baths and rinses, fume scrubbing, tumbling, and miscellaneous wastestreams. The basis for the off-kg values used in the calculation of production-based limits (multipliers used for each Copper Forming subpart) can be found in the files.
Description of all dilution streams:	None

Sample Point 02 - Federal Cyanide Sample Point

Flow Stream:	Cyanide-based plating
Average Daily Flow:	979 GPD
Maximum Daily Flow:	1,900 GPD
Frequency of Discharge	Continuous
Description of all Processes contributing to this Wastestream:	Cyanide based plating
Description of all dilution streams:	None

Non Categorical Discharge Points: 0

Part V Existing Pretreatment

Pretreatment Process

CN destruction
Chromium Reduction
Heavy metals removal (Flocculation, Metal hydroxide precipitation, Clarifier, Filtration)
Ion exchange

Adequacy of Pretreatment

Pretreatment is the Best Applicable or Practical Control Technology for this process.

Certification

IU has certified that the Pretreatment equipment is adequate to meet all local and federal limits.

Part VI Discussion of Pollutants; Rationale for Limits and Special Conditions

A. Discussion of Pollutants

Sample Location	Pollutant Discussion
01 - Final Sample Point	Copper parts are formed using presses and dies. IU plates silver, chromium, cadmium, and nickel. IU uses cyanide based chemistry for plating. Corrosive solutions are used in plating and pretreatment processes. Review of records shows no TTOs regulated under 40 CFR 468 or 40 CFR433 on site.
02 - Federal Cyanide Sample Point	Cyanide based chemistry is used for plating.

B. Rationale for Limits

Sample Location	Limit Rationale
01 Final Sample Point	Jennings Technology is identified as a Metal Finishing -New Source and Copper Forming-New Source and regulated under 40 CFR 433.17 and 40 CFR 468.15. There are federal limits for cadmium, chromium, copper, cyanide, lead, nickel, oil & grease, silver, TTOs, and zinc for these categories. The final federal limits are based on the conversion of the copper forming mass-based limits to concentration-based limits and then the use of the Combined Wastestream Formula to combine the copper forming and metal finishing limits. A separate cyanide sample point is in place so the cyanide federal limits do not apply at this sample point. Federal and local limits for pH apply to all discharges. Jennings may certify in lieu of testing for TTOs that no TTOs are stored or used at their facility. The alternate oil & grease limit may not be used due to the limit being below standard laboratory detection values. Jennings discharges more than 1000 gpd, therefore they are identified as a standard flow discharger for the local limits. The monthly average TTO limit is below background TTO levels in drinking water. Jennings may document the absence of TTOs at their facility through evaluation of chemistry and sampling. If they are able to document that TTOs are not added to the wastewater from their processes, the monitoring requirement for TTOs will be waived. The sampling waiver must be reestablished with each discharge permit.
02 Federal Cyanide Sample Point	This is a federal cyanide sample point monitoring the discharge of cyanide-bearing wastewater after cyanide pretreatment. The federal daily maximum and monthly average total cyanide limits will be monitored at this sample point.

C. Full Chemical Disclosure:

See application file for chemical inventory

Part VII Calculation(s) Used to Derive Limits (if applicable).

A. Combined Wastestream Formula calculations — Yes

B. Equivalent Mass or Equivalent Concentration-Based limit calculations — Yes

C. Production-Based limit calculations — Yes

Combined Wastestream Formula Permit Limits

Parameter	Daily Max.	Monthly Avg.	Daily Avg.	4 Day Avg.

Part VIII Sampling Frequencies and Methods

SMR Sampling

Sampling Location: 01 - Final Sample Point

Sampling Frequency:	Parameter	Type

Semiannually in Mar, Sep	Cadmium	COMP
	Chromium Total	COMP
	Copper	COMP
	Cyanide Total	GRAB
	Lead	COMP
	Nickel	COMP
	pH	GRAB
	Silver	COMP
	Total Toxic Organics	
	Zinc	COMP

Discussion

The City considers any SIU that has processes that do not produce a discharge that changes over time or days, discharge less than 5000 gpd, or include in their treatment ion exchange, membrane or ultra filtration, or is not a Centralized Waste Treatment facility, to be a non-variable discharger. Maintaining a standard monitoring frequency of semiannually for the IU and POTW is intended to capture sample data that is representative of their discharge practices. This discharger is considered a non-variable discharger and will be monitored at the standard frequency of semiannually.

Jennings Technology uses ion exchange for pretreatment of metals from their process wastewater discharge. The use of ion exchange produces a discharge that does not vary over time or days. Jennings Technology will be monitored semiannually as a non-variable discharger.

Sampling Location: 02 - Federal Cyanide Sample Point

Sampling Frequency:	**Parameter**	**Type**
Semiannually in Aug, Feb	Cyanide Total	GRAB

Discussion

The City considers any SIU that has processes that do not produce a discharge that changes over time or days, discharge less than 5000 gpd, or include in their treatment ion exchange, membrane or ultra filtration, or is not a Centralized Waste Treatment facility, to be a non-variable discharger. Maintaining a standard monitoring frequency of semiannually for the IU and POTW is intended to capture sample data that is representative of their discharge practices. This discharger is considered a non-variable discharger and will be monitored at the standard frequency of semiannually.

Jennings Technology uses ion exchange for pretreatment of metals from their process wastewater discharge. The use of ion exchange produces a discharge that does not vary over time or days. Jennings Technology will be monitored semiannually as a non-variable discharger.

POTW Sampling

Sampling Location: 01 -Final Sample Point

Sampling Frequency:	**Parameter**	**Type**
Semiannually	Cadmium	COMP
	Chromium Total	COMP
	Copper	COMP
	Cyanide Total	GRAB
	Lead	COMP
	Nickel	COMP
	pH	GRAB
	Silver	COMP
	Total Toxic Organics	
	Zinc	COMP

Discussion

The City considers any SIU that has processes that do not produce a discharge that changes over time or days, discharge less than 5000 gpd, or include in their treatment ion exchange, membrane or ultra filtration, or is not a Centralized Waste Treatment facility, to be a non-variable discharger. Maintaining a standard monitoring frequency of semiannually for the IU and POTW is intended to capture sample data that is representative of their discharge practices. This discharge is considered a non-variable discharger and will be monitored at the standard frequency of semiannually.
Jennings Technology uses ion exchange for pretreatment of metals from their process wastewater discharge. The use of ion exchange produces a discharge that does not vary over time or days. Jennings Technology will be monitored semiannually as a non-variable discharger.

Sampling Location: 02 -Federal Cyanide Sample Point

Sampling Frequency:	Parameter	Type
Semiannually	Cyanide Total	GRAB

Discussion

The City considers any SIU that has processes that do not produce a discharge that changes over time or days, discharge less than 5000 gpd, or include in their treatment ion exchange, membrane or ultra filtration, or is not a Centralized Waste Treatment facility, to be a non-variable discharger. Maintaining a standard monitoring frequency of semiannually for the IU and POTW is intended to capture sample data that is representative of their discharge practices. This discharge is considered a non-variable discharger and will be monitored at the standard frequency of semiannually.
Jennings Technology uses ion exchange for pretreatment of metals from their process wastewater discharge. The use of ion exchange produces a discharge that does not vary over time or days. Jennings Technology will be monitored semiannually as a non-variable discharger.

Baseline Monitoring Report:

Due on: 12/20/1983 Received on: 02/29/1984

Comments:

Part IX Solvent Management Plan

A. Required as a condition of the permit:

No

B. Justification

There are no solvents used that are considered TTOs for either applicable category.

C. Description of Solvent Management Plan

Jennings may certify in lieu of testing for TTOs. In order to waive the monitoring requirement for TTOs, Jennings must demonstrate that they are not present through documentation and sampling.

Part X SIU Determination [40 CFR 403.3(t)]

This IU has a categorical operation making them an SIU.

SIU Letter Issue Date: 08/07/1992

Part XI RCRA Notification Letter

Issue Date: 12/29/1993

Part XII Slug Prevention Plan Evaluation

Required?	Last Evaluated	Due	Submitted	Last Submitted	Last Reviewed	Approved
N	12/17/2010					
N	12/17/2011					

Part XIII Water/Wastewater Information

Account Number	Meter Number
217984-4	2
217983-6	1

Inspector: C Cassidy — Colleen Cassidy — 7/24/12 — Date

Permit Writer: Stephen Lowes — Steve Lowes — 7/24/12 — Date

Jennings Technology Corporation

Historical Information Related to Categorization

Date	Event	Information Source
1944	Jennings begins operating	Permit applications
1950s	Pretreatment installed	1992 Fact Sheet
1980	Pretreatment updated	1992 Fact Sheet
1982	Metal finishing date for new sources 8/31/82, copper forming date for new sources 11/12/82.	EPA
11/13/90	EPA Inspection conducted due to multiple violations from 1987 to 1990. Diagram of pretreatment area and pretreatment description includes cyanide destruction, chromium reduction, precipitation, clarification, and filter press. Requirement to evaluate pretreatment system for possible improvements. EPA concludes Jennings is an existing source electroplater and copper former.	EPA inspection report and order issued to Jennings
2/28/92	1991 Pretreatment Annual Report notes for Jennings state that additional pretreatment was installed during the fourth quarter of 1991 to achieve compliance.	91 Annual Report
11/94	Jennings pretreatment system diagram shows the addition of ion exchange columns.	1995 permit application
6/7/95	New inspector notes that many changes and improvements have occurs since their previous inspection done in 1994.	Inspection report file
9/28/95	Cyanide and chromium treatment tanks were replaced during shutdown.	Inspection report file
5/13/97	Chromium treatment process changed to meet compliance	Compliance meeting notes
5/21/97	New sand filter installed at discharge from clarifier and significant reduction in pollutant discharge concentrations was observed	7/27/97 letter from Jennings summarizing compliance schedule completion
2012	Jennings installed a new electropolishing line	Field observation