



THE CITY OF SAN DIEGO

February 27, 2015

Mr. David W. Gibson, Executive Officer
California Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Dear Mr. Gibson:

Subject: RWQCB Order No. R9-2009-0001, NPDES Permit No. CA0107409
Point Loma POTW Semi-annual SIU Compliance Status Report, Jul - Dec 2014

The San Diego Public Utilities Department Industrial Wastewater Control Program (IWCP) Point Loma POTW SIU Compliance Status Report for the period of July 1 through December 31, 2014 is hereby submitted in accordance with the requirements of Order No. R9-2009-0001, adopted June 10, 2009. Table 1 presents a summary of pollutant and reporting violations for all significant industrial users (SIUs) during this reporting period and Table 2 lists NOV administrative fees recovered. Table 3 describes on-going active enforcement actions taken in response to SIU noncompliance identified in previous reports.

During this reporting period, no ANO penalty payments were collected.

During this reporting period, no IUs were required to prepare and/or implement pollution prevention plans pursuant to CA SB 709 and SB 2165.

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for

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submitting false information, including the possibility of fine and imprisonment.

Should you have any questions regarding information provided in this semi-annual report, please contact John Steger, Industrial Wastewater Control Program Compliance Supervisor, at (858) 654-4103.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter S. Vroom".

Peter S. Vroom. Ph.D.
Public Utilities Deputy Director
Environmental Monitoring and Technical Services Division

BLS

cc: Amelia Whitson, Pretreatment Coordinator, EPA Region IX
Regulatory Unit, Water Quality Div., State Water Resources Control Board
Halla Razak, Director of Public Utilities, City of San Diego
Robert Mulvey, Assistant Director of Public Utilities, City of San Diego
Barbara Sharatz, Pretreatment Program Manager, City of San Diego
File

Table 1 Semi-Annual SIU Compliance Status Report

01-Jul-2014 through 31-Dec-2014

SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
Cubic Defense Applications Inc 9233 Balboa Av, San Diego	06-0026	1	360	No		160	01-Nov-14	Zinc, Total	1.91	1.48	MO	F	Y
Doncasters GCE Industries 757 Main St, Chula Vista	13-0115	1	913	No		330	01-Jul-14	Chromium, Total	7.71	1.71	MO	F	Y
						330	01-Jul-14	Lead, Total	.68	.43	MO	F	Y
						330	01-Jul-14	Nickel, Total	2.53	2.38	MO	F	N
						330	01-Jul-14	Zinc, Total	5.26	1.48	MO	F	Y
						330	31-Jul-14	Chromium, Total	7.71	2.77	DM	F	Y
						330	31-Jul-14	Zinc, Total	5.26	2.61	DM	F	Y
						330	20-Oct-14	SMR Incomplete - failed notify in 24 hrs					
						330	20-Oct-14	SMR Incomplete - failed to resample					
GKN Aerospace Chem-tronics Inc 1150 W Bradley Av, El Cajon	16-0520	1	26826	Yes	SNC2 - TRC (MO): Zn 1/2,Zn 1/3	460	01-Sep-14	Zinc, Total	2.38	1.48	MO	F	Y
						460	26-Sep-14	Zinc, Total	4.76	2.61	DM	F	Y
General Services Administration - SYLPOE 720 E San Ysidro Bl, San Diego	12-0285	3	1470	No		110	21-Jul-14	SMR Late - written notice					
						110	22-Sep-14	SMR Late - written notice					
						120	21-Jul-14	SMR Late - written notice					
						120	22-Sep-14	SMR Late - written notice					
						130	21-Jul-14	SMR Late - written notice					
						130	22-Sep-14	SMR Late - written notice					
							02-Jul-14	Delinquent Requirement					
Hotel Del Coronado 1500 Orange Av, Coronado	14-0034	3	29187	No		110	28-Jul-14	SMR Incomplete					
						110	27-Oct-14	SMR Incomplete					
Jensen Meat Company Inc 2550 Britannia Bl Suite 101, San Diego	12-0275	3	20076	No		110	28-Jul-14	SMR Incomplete					
						110	28-Jul-14	SMR Incomplete					
						110	20-Oct-14	SMR Incomplete					

Semi-Annual SIU Compliance Status Report

01-Jul-2014 through 31-Dec-2014

SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
Kyocera America Inc 8611 Balboa Av, San Diego	06-0058	1	43590	No		140	13-Oct-14	pH-lowest value	3.2	5	DM	F	N
Major Scientific Industries 3557 Dalbergia St, San Diego	11-0272	1	5	No		110	23-Jul-14	Delinquent Requirement					
						110	23-Oct-14	SMR Late - written notice					
RJ Donovan Correctional Facility 480 Alta Rd, San Diego	12-0038	3	48948	No		100	21-Nov-14	SMR Late - written notice					
Southern California Plating Company Inc 3261 National Av, San Diego	11-0024	1	1292	No		110	28-May-14	Cadmium, Total	.1				N
						110	28-May-14	Lead, Total	.5				N
						110	28-May-14	Silver, Total	.5				
						110	01-Jul-14	Zinc, Total	1.55	1.48	MO	F	N
						110	05-Aug-14	SMR Incomplete					
Southwest Products LLC dba Circle Foods 8411 Siempre Viva Rd, San Diego	12-0220	3	99222	No		110	27-Aug-14	Temperature-Instantaneous	32				
						110	01-Oct-14	SMR Incomplete					
USN;Naval Base Coronado - NASNI NAS North Island, San Diego	08-0018	1	34167	Yes	SNC2 - TRC (DM): SulfD 10/19,SulfD 5/12	100	15-Jul-14	Sulfides, Dissolved-Instantaneous	5.12	1	DM	L	Y
						100	25-Aug-14	Sulfides, Dissolved-Instantaneous	3	1	DM	L	Y
						100	27-Aug-14	Sulfides, Dissolved-Instantaneous	3.5	1	DM	L	Y
						100	15-Dec-14	Sulfides, Dissolved-Instantaneous	1.5	1	DM	L	Y
						100	15-Dec-14	Sulfides, Dissolved-Instantaneous	5.5	1	DM	L	Y
UT; G & M Oil Company 3774 Main St, San Diego	11-0539	2	1901	No		100	17-Nov-14	SMR Incomplete					
UT; HPS Mechanical Inc 1900 Avenida De La Playa, La Jolla	04-0489	3	2016000	No		1000	06-Jan-15	SMR Incomplete					

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SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
UT; SCS Engineers Inc 101 16th St, San Diego	11-0559	2	14400	No		100	22-Sep-14	SMR Incomplete					
						100	06-Jan-15	SMR Incomplete					
UT; T2 Development 2137 Pacific Highway, San Diego	11-0567	2	36000	No		100	21-Jul-14	SMR Late - written notice					
						100	02-Sep-14	SMR Incomplete					
UT; Western Pump Inc 3355 Terminal Rd, San Diego	08-0594	2	115200	No		100	23-Oct-14	SMR Late - written notice					
						100	21-Nov-14	SMR Late - written notice					
UT; World Oil Marketing Company 685 H St, Chula Vista	13-0303	2	14400	No		100	31-Dec-14	Minimum gals/min thru meter when discharging	.4	.5	DM	L	N
Unifirst Corporation 4041 Market St, San Diego	11-0398	2	24268	No		110	03-Nov-14	SMR Incomplete					
						110	14-Nov-14	Oil and grease, Total-Instantaneous	710	500	DM	L	Y
Vanguard Space Technologies Inc 5660 Eastgate Dr Suite D, San Diego	02-1136	1	17	No		110	01-Oct-14	Zinc, Total	1.61	1.48	MO	F	N
						110	23-Oct-14	SMR Late - written notice					
						120	23-Oct-14	SMR Late - written notice					

Table 2 NOVs Issued in 2nd half of 2014 for SIUs Discharging to Treatment Plant 1

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<i>Name</i>	<i>Facility</i>	<i>Conn</i>	<i>NOV</i>	<i>Identified</i>	<i>Action</i>	<i>Viol Date</i>	<i>Fee</i>	<i>Level</i>
AlSCO Inc	09-0001	100	73992	24-Mar-2014	28-Aug-2014	27-Feb-2014	75	Second notice
Circle Foods LLC	12-0220	110	76012	01-Oct-2014	01-Oct-2014	27-Aug-2014	50	Notice only
Coating Services Group LLC	33-0044	110	73756	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
Cubic Defense Applications Inc	06-0026	160	73747	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
			75483	20-Aug-2014	20-Aug-2014	10-Apr-2014	50	Notice only
			76138	20-Oct-2014	30-Oct-2014	31-Jul-2014	100	Initial notice
Doncasters GCE Industries	13-0115	330	76138	20-Oct-2014	03-Nov-2014	31-Jul-2014	100	Final notice
			76448	12-Nov-2014	12-Nov-2014	31-Jul-2014	100	Initial notice
			73753	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
Doncasters GCE Industries	13-0115	410	73753	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
Emerald Textiles LLC	12-0065	110	76108	20-Oct-2014	21-Oct-2014	15-Jul-2014	0	Notice only
GKN Aerospace Chem-tronics Inc	16-0520	460	76371	10-Nov-2014	10-Nov-2014	26-Sep-2014	100	Initial notice
			76668	12-Nov-2014	12-Nov-2014	26-Sep-2014	100	Initial notice
GKN Aerospace Chem-tronics Inc	16-0520	510	73755	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
Garvin Industries	16-0033	110	75494	20-Aug-2014	20-Aug-2014	09-Apr-2014	100	Initial notice
General Dynamics NASSCO	11-0051	310	73750	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
General Services Administration - SYLPOE	12-0285	110	75264	21-Jul-2014	21-Jul-2014		100	Initial notice
			75985	22-Sep-2014	22-Sep-2014		100	Initial notice
General Services Administration - SYLPOE	12-0285	120	75265	21-Jul-2014	21-Jul-2014		100	Initial notice
			75986	22-Sep-2014	22-Sep-2014		100	Initial notice
General Services Administration - SYLPOE	12-0285	130	75266	21-Jul-2014	21-Jul-2014		100	Initial notice
			75987	22-Sep-2014	22-Sep-2014		100	Initial notice
Golden State Metal Finishing	34-0070	110	74403	15-May-2014	27-Aug-2014	17-Apr-2014	75	Second notice
			75505	20-Aug-2014	20-Aug-2014	17-Apr-2014	100	Initial notice
Hotel Del Coronado	14-0034	110	75273	28-Jul-2014	28-Jul-2014		50	Notice only
			76178	27-Oct-2014	27-Oct-2014		50	Notice only
Jensen Meat Company Inc	12-0275	110	75272	28-Jul-2014	31-Jul-2014	03-Jul-2014	50	Notice only
			76109	20-Oct-2014	21-Oct-2014	04-Sep-2014	50	Notice only
Kyocera America Inc	06-0058	140	76713	17-Nov-2014	24-Nov-2014	14-Oct-2014	100	Initial notice
Major Scientific Industries	11-0272	110	75269	23-Jul-2014	23-Jul-2014		100	Final notice
			76174	23-Oct-2014	23-Oct-2014		50	Notice only
RJ Donovan Correctional Facility	12-0038	100	76790	21-Nov-2014	21-Nov-2014		50	Notice only
Southern California Plating Company Inc	11-0024	110	75328	05-Aug-2014	06-Aug-2014	30-Jun-2014	50	Notice only
			76437	12-Nov-2014	12-Nov-2014	11-Jul-2014	100	Initial notice
Spectex Inc dba Specialty Textile Services	12-0283	110	76235	27-Oct-2014	27-Oct-2014	26-Sep-2014	100	Initial notice
Thermal Management Solutions dba Santier	03-0722	110	76871	01-Dec-2014	01-Dec-2014	15-Oct-2014	0	Initial notice
			76910	08-Dec-2014	08-Dec-2014	23-Oct-2014	0	Initial notice

Table 2 NOVs Issued in 2nd half of 2014 for SIUs Discharging to Treatment Plant 1

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<i>Name</i>	<i>Facility</i>	<i>Conn</i>	<i>NOV</i>	<i>Identified</i>	<i>Action</i>	<i>Viol Date</i>	<i>Fee</i>	<i>Level</i>
USN;Naval Base Coronado - NASNI	08-0018	100	73749	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
			75380	11-Aug-2014	14-Aug-2014	10-Jun-2014	50	Notice only
			75382	11-Aug-2014	14-Aug-2014	25-Jun-2014	50	Notice only
			75856	02-Sep-2014	03-Sep-2014	15-Jul-2014	50	Notice only
			76122	20-Oct-2014	20-Oct-2014	27-Aug-2014	50	Notice only
			76990	23-Dec-2014	23-Dec-2014	15-Dec-2014	50	Notice only
UT; G & M Oil Company	11-0539	100	76708	17-Nov-2014	17-Nov-2014	31-Oct-2014	100	Initial notice
UT; Innovative Environmental Solutions	13-0454	100	73788	31-Dec-2013	30-Jul-2014	31-Dec-2013	266	Final notice
UT; SCS Engineers Inc	11-0559	100	75948	22-Sep-2014	23-Sep-2014		50	Notice only
UT; T2 Development	11-0567	100	75091	30-Jun-2014	02-Jul-2014	31-May-2014	100	Initial notice
			75263	21-Jul-2014	21-Jul-2014		100	Initial notice
			75848	02-Sep-2014	02-Sep-2014		50	Notice only
			75090	30-Jun-2014	01-Jul-2014	31-May-2014	50	Notice only
UT; Transtar Pipeline Inc	09-0987	100	75090	30-Jun-2014	01-Jul-2014	31-May-2014	50	Notice only
UT; Western Pump Inc	08-0594	100	76173	23-Oct-2014	05-Nov-2014		50	Notice only
			76896	21-Nov-2014	02-Dec-2014		100	Initial notice
			76290	03-Nov-2014	03-Nov-2014	30-Sep-2014	100	Initial notice
Unifirst Corporation	11-0398	110	76290	03-Nov-2014	03-Nov-2014	30-Sep-2014	100	Initial notice
			76290	03-Nov-2014	03-Nov-2014	30-Sep-2014	100	Final notice
Vanguard Space Technologies Inc	02-1136	110	76169	23-Oct-2014	23-Oct-2014		0	Notice only
Vanguard Space Technologies Inc	02-1136	120	76170	23-Oct-2014	23-Oct-2014		0	Notice only
Veridiam Inc	16-0348	110	71850	30-Jun-2013	30-Jul-2014	30-Jun-2013	266	Final notice
Total fees:							\$5,478	
NOV count:			56					

Table 3 SIU Enforcement Actions Initiated, Continued, or Finalized in CY2014

Coating Services Group LLC; IU # 33-0044/21-0331

This metal finisher performs contract coating, including etching, from which there is no discharge. An average of 30 gpd is discharged from an associated cleaning operation without any pretreatment. A single sample collected by the IWLab in December resulted in both a daily maximum and monthly average TRC violation for chromium and in SNC status for the 4th quarter. NOVs were issued and the IU reported it believes the sample was not representative of the actual discharge to sewer, concluding it contained sediment that had accumulated in the sample box since the sample's appearance was "cloudy gray" instead of the typical "clear and colorless" and because it was collected from the bottom, instead of the middle, of the sampling box. Additional program monitoring was scheduled for the first half of 2014 to determine whether the IU's planned periodic cleaning of the sample box is sufficient to ensure compliance and whether on-going results support the IU's conclusion that the December sample was not representative. In 2014, all 13 monitoring events (8 by the program) demonstrated compliance and no further enforcement actions are planned.

Cubic Defense Applications Inc; IU # 06-0026

This manufacturer of electronic equipment is regulated as a metal finisher and discharges an average of 360 gpd from 3 monitoring points. The operations discharging are wave soldering to Connection 150, deburring, cleaning, and silkscreening to Connection 160, and testing to Connection 170. At Connection 160, monthly average violations for copper in October and December 2013 resulted in SNC status for the 4th quarter. NOVs were issued and the IU attributed the violations to the tumbler deburring wastestream after establishing that 2 of the aluminum alloys used contain copper and discovering that employees were not discharging the recycled wastestream from its bucket on a regular basis, but instead were leaving the task to the next person until the sludge build-up on the bottom and foam cap on top made it unusable. The operator has been instructed to discharge the wastewater daily and a mechanic will perform weekly checks of the bucket to confirm. In 2014, there were additional monthly average violations for copper in March and April and for zinc in November, but the IU avoided SNC status. NOVs were issued and the IU suspended discharge at Connection 160 from August to October while it installed a filtering system to ensure consistent compliance. IU self monitoring in December was in compliance for all regulated pollutants and additional program monitoring has been scheduled for the first half of 2015.

Doncasters GCE Industries; IU # 13-0115

This sheet metal fabricator of components for stationary turbine power units discharges about 900 gpd from associated metal finishing operations, including 340 gpd to Connection 410 from dye penetrant testing and water jet cutting. A single sample at Connection 410 in October 2013 exceeded the daily maximum and monthly average for chromium and resulted in SNC status for the fourth quarter. NOVs were issued for the violations and in its response the IU indicated it had not changed out its filter media frequently enough to meet the demand of production levels and would implement a bi-monthly change out going forward. In 2014, all 9 monitoring events at Connection 410 (5 by the program) demonstrated compliance and no further enforcement actions are planned.

GKN Aerospace Chem-tronics Inc; IU # 16-0520

This metal finisher performs fabrication and repair of engine components and discharges a combined total of approximately 27,000 gpd to 5 outfalls after monitoring at 10 process sample

points. A monthly average and two daily maximum violations for zinc at Connection 510 in September 2013 resulted in SNC status for the 3rd and 4th quarters. Connection 510 is the monitoring point for the discharge of 130 gpd from the dye penetrant operation in Building 8. In its investigation the IU identified a nearby corroded galvanized steel frame for the mist suppression filter bank as the source of zinc, concluding the pressure washing of the dye penetrant booth in the week before the initial violation had dislodged corrosion salts and flushed them to the drain. The IU has since applied a corrosion resistant coating to the galvanized frame and thoroughly cleaned the entire system to the sampling trap. NOVs were issued and all subsequent monitoring events (13 total, 7 by the program) through the end of 2014 demonstrated compliance; therefore no further enforcement actions are planned.

In September 2014, a single sample at Connection 460 exceeded the monthly average and daily maximum for zinc resulting in SNC status for the 4th quarter. Connection 460 is the monitoring point for the discharge of 100 gpd from the dye penetrant operation in Building 6. In response to the NOVs the IU stated that none of the parts cleaned in this booth contain zinc, but a possible source is solids inadvertently captured during the sampling from the sump. Although the building 6 sump is regularly cleaned quarterly, the IU planned to have it cleaned out by December 5 as a precaution. Additional program monitoring has been scheduled for the first half of 2015 to determine whether this action was sufficient to ensure compliance.

General Dynamics NASSCO; IU # 11-0051

This shipbuilding and repair facility is regulated as a metal finisher and discharges about 7,400 gpd from their wastewater treatment facility to Connection 310. A single sample at Connection 310 in October 2013 exceeded the monthly average for copper and resulted in SNC status for the fourth quarter. In its response to the NOV, the IU attributed the violation to a faulty diaphragm pump between the surge tank and retention tank that injects air into the wastestream. The pump was replaced and the IU's subsequent self monitoring in mid-November was in compliance. For 2014, all 7 monitoring events (3 by the program) demonstrated compliance; no further enforcement actions are planned.

Golden State Metal Finishing; IU# 34-0070

This job shop metal finisher discharges around 350 gpd to Connection 110 of pH-adjusted rinse water from aluminum anodizing, etching, and coating operations. A monthly average violation for cyanide in April for one of three months sampled resulted in SNC status for the six-month period ending in September 2014. An NOV was issued for the violation, and in response the IU indicated it had no explanation for the high level observed and noted it hauls off as hazardous waste all the rinsewater from the small chemfilm line. As all 7 subsequent monitoring events in 2014 demonstrated compliance; no further enforcement actions are planned.

Pacira Pharmaceuticals Inc; IU # 02-0762

This pharmaceutical company transitioned from clinical trials to the manufacture of therapeutic products in November 2004 and has subsequently been regulated under the pretreatment standards set forth at 40 CFR 439.47, for a discharge of just over 3500 gpd. A single sample in January caused the IU to exceed its monthly average for methylene chloride and resulted in SNC status for the first quarter of 2014. In its response to the NOV, the IU attributed the violation to an accidental spill during the internal cleaning of the process equipment. To prevent recurrence, future spills inside the manufacturing area are to be contained and collected until proper characterization and disposal methods are determined. As all 6 subsequent monitoring events in 2014 (2 by the program) demonstrated compliance; no further enforcement actions are planned.

Unifirst Corporation; IU # 11-0398

This industrial laundry and textile rental service discharges an average of 26,000 gpd to a single outfall designated as Connection 110. The IU is required to self monitor quarterly at this location for pH, oil and grease, COD, TSS, and metals. In September of 2012 the IU disclosed it had failed to submit all representative Self-Monitoring (SM) analyses conducted in the first half of the year. Thus with its 3rd quarter SM Report, the IU submitted results from 10 additional sampling events it had conducted from January to June 2012. As a result, the IU met the SNC criteria for the 6 month period ending with the 3rd quarter of 2012 for 1) late reporting (SM data was submitted late by more than 45 days); and 2) because 5 of the 14 samples analyzed exceeded the daily maximum for oil and grease by more than the TRC. NOVs were issued and the IU responded that they had:

- 1) cleaned out their sludge tank;
- 2) power washed the lines to make sure there is no build-up,
- 3) upgraded their waste water instrumentation system and installed new pH probes and analyzers,
- 4) worked with corporate engineering and the soap vendor to minimize impacts on the oil and grease levels in the discharge due to switching from powder to liquid detergent, and
- 5) monitored the wastewater system to make sure everything is working properly.

Compliance Order (CO) No. 2013-69962, issued May 1, 2013, ordered the IU to: 1) submit an engineering plan by June 15, 2013, outlining the steps necessary to achieve and maintain compliance; 2) either cease discharge or take necessary corrective actions to achieve consistent compliance with permit limits by October 1, 2013; and 3) submit specified financial information by October 15, 2013. In response, the IU installed a dissolved air floatation (DAF) system in August and met all the CO deadlines. All 8 monitoring events in 2013 (4 by the IU and 4 by the IWLab) demonstrated compliance with the oil and grease limit with the 3 subsequent to the DAF installation yielding values at or below 200 mg/L compared to the prior values between 330 – 500 mg/L. In 2014, 8 of 9 (4 by the program) monitoring events demonstrated compliance, but a November self monitoring sample exceeded the oil and grease limit. An NOV was issued and the IU stated its investigation led it to replace the check valve on the DAF chemical feed tank. The subsequent resample in November demonstrated a return to compliance; a penalty order is planned for 2015.

USN;Naval Base Coronado – NASNI; IU # 08-0018

This large Navy base on San Diego Bay discharges around 100,000 gpd of combined sanitary and pretreated industrial wastewater through a single sewer outfall designated as Connection 100. Industrial processes are monitored at 6 upstream sampling locations, most notably at Connection 120, which receives an average of 5700 gpd from the Industry Wastewater Treatment Plant, and Connection 150 which receives about 27,200 gpd from the Oil Recovery Plant. After program monitoring at Connection 100 yielded elevated values for dissolved sulfides, the permit was amended in January 2013 to include the dissolved sulfides local limit (1 mg/L) and add self-monitoring requirements for this pollutant.

Daily maximum violations for dissolved sulfides in April and then June through December 2013 resulted in SNC status for the six-month periods ending in the 2nd, 3rd, and 4th quarters. NOVs were issued for the violations and in response to the 2nd quarter violations the IU reported 1) it has been investigating dissolved sulfides to determine the source so mitigation can be implemented, 2) samples were collected from seven locations in January 2013 and from eight different locations in February 2013, however the results were inconclusive, 3) due to the intermittent nature of some discharges and the large size of the collection system, multiple sampling studies may be required to narrow down the source(s), and 4) it is pursuing a contract

to sample 47 lift stations weekly for four consecutive weeks.

A Preliminary Conference was held on October 30, 2013 in response to the continuing violations and to assess the IU's progress in determining the cause and corrective actions. Compliance Order (CO) No. 2013-72092, issued November 6, 2013, ordered the IU to: 1) submit an assessment of causes for the violations and a list of planned corrective actions by November 20, 2013; and 2) either cease discharge or take necessary corrective actions to achieve consistent compliance with permit limits by January 15, 2014. In response the IU reported its sampling study of the base's lift stations has identified the aircraft carrier piers and the Oil Recovery Plant as sources and the actions taken to achieve compliance include (1) treatment with metered chemical (ferrous chloride) injection at lift station 1250 to control hydrogen sulfide levels, and (2) increased frequency of wet well cleaning. The IU asserted its self monitoring for dissolved sulfides on December 18, 2013 yielding < 0.5 mg/L demonstrated their return to compliance. Several additional steps were planned to further evaluate upstream sources. These included establishing a standard operating procedure to flush remote lift stations when not operating to prevent stagnation, and awarding a contract to assess the existing base sewer layout, wet well cleaning schedule, and chemical treatment strategy, and provide recommendations for potential improvements.

Extensive monitoring (34 events, 20 by the program) in 2014 established that the IU remained in SNC status for all 4 quarters. NOVs were issued for the dissolved sulfides daily maximum violations and in response the IU submitted an implementation schedule for further corrective actions to be completed by the end of the year. Monthly progress reports were required and by end of 2014 the IU had (1) implemented a quarterly wet well cleaning schedule including the carrier pier and cleaned 11 MHs in the low flow, southeast portion of the base; (2) upgraded the ferrous chloride injection system for the east side of the facility from time to level (flow) control; (3) obtained funding and approvals for installing a second ferrous chloride level-controlled injection system for the west side of the facility (targeting completion in January 2015, system startup in February 2015); and (4) finalized the scope of work for replacing the interim calcium hypochlorite treatment with hydrogen peroxide addition at the Oil Recovery Plant (ORP)/Industrial Wastewater Treatment Plant (IWTP). The hydrogen peroxide addition is anticipated to be in place by the January 2016. Continued monitoring is scheduled for 2015 to determine whether these actions are sufficient to ensure compliance.

UT; Innovative Environmental Solutions; IU # 13-0454

This groundwater remediation site with free product discharges an average of 300 gpd after pretreatment including an oil water separator, microfiltration, and carbon absorption. Four consecutive self monitoring violations for benzene in August through November 2013 resulted in SNC status for the 4th quarter. Furthermore, the IU had failed to notify the program within 24 hours of becoming aware of each of the 4 violations. NOVs were issued for the violations and in its response the IU stated it had established that the 3 granular activated carbon (GAC) vessels had been saturated when the violations occurred, and that they were replaced on December 5, 2013. Subsequent monitoring by the IU on December 8 and all 11 monitoring events including 4 by the program in 2014, confirmed that compliance was re-established for benzene. A penalty order is planned.