



THE CITY OF SAN DIEGO

August 29, 2014

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

Attention: Pretreatment Coordinator

Dear Mr. Gibson:

Subject: Board Order No. R9-2009-0001 NPDES Permit No. CA0107409
Point Loma POTW Semi-annual SIU Compliance Status Report, Jan – Jun 2014

The San Diego Metropolitan Wastewater Pretreatment Program Semi-annual SIU Compliance Status Report for the period of January 1 through June 30, 2014, due September 1, 2014, is hereby submitted in accordance with the requirements of NPDES Permit No. CA0107409, adopted by the Regional Water Quality Control Board on June 10, 2009 and issued by the U.S. Environmental Protection Agency on June 16, 2010. 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 non-compliance 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



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information is true, accurate and complete. I am aware that there are significant penalties for 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, IWCP Compliance Supervisor, at (858) 654-4103.

Sincerely,



Peter S. Vroom, Ph.D.
Deputy Director, EMTS Division

BLS/

Enclosure

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
Barbara Sharatz, Pretreatment Program Manager, City of San Diego
File

Table 1. Semi-Annual SIU Compliance Status Report

01-Jan-2014 through 30-Jun-2014

SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
AP Precision Metals 1215 30th St, San Diego	12-0144	1	75	No		110	29-Apr-14	SMR Late - written notice					
						110	05-May-14	SMR Incomplete					
Alsco Inc 705 W Grape St, San Diego	09-0001	3	45908	No		100	21-Feb-14	Oil and grease, Total	912	667	DM	L	Y
						100	27-Feb-14	Oil and grease, Total	868	667	DM	L	Y
						100	24-Mar-14	SMR Incomplete - failed notify in 24 hrs					
						100	24-Mar-14	SMR Incomplete - failed to resample					
CP Kelco 2025 E Harbor Dr, San Diego	11-0444	2	673257	No		430	18-Feb-14	Sulfides, Dissolved	1.1	1	DM	L	N
Chromalloy San Diego 7007 Consolidated Wy, San Diego	05-0985	1	50	No		130	21-Jan-14	SMR Incomplete					
						130	23-Jan-14	SMR Incomplete					
						130	23-Jan-14	SMR Incomplete					
						130	23-Jan-14	SMR Incomplete					
Circle Foods LLC 8411 Siempre Viva Rd, San Diego	12-0220	3	59574	No		110	27-Feb-14	Oil and grease, Total	625	500	DM	L	N
Cubic Defense Applications Inc 9233 Balboa Av, San Diego	06-0026	1	360	No		160	10-Feb-14	SMR Incomplete - failed notify in 24 hrs					
						160	01-Mar-14	Copper, Total	2.33	2.07	MO	F	N
						160	13-Mar-14	Copper, Total	4.43	3.38	DM	F	Y
						160	01-Apr-14	Copper, Total	2.28	2.07	MO	F	N
Emerald Textiles LLC 1725 Dornoch Ct, San Diego	12-0065	3	67703	No		110	26-Mar-14	SMR Late - written notice					
Garvin Industries 316 Millar Av, El Cajon	16-0033	1	37	No		110	01-Apr-14	Copper, Total	2.12	2.07	MO	F	N

Semi-Annual SIU Compliance Status Report

01-Jan-2014 through 30-Jun-2014

SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
Golden State Metal Finishing 2737 Via Orange Wy, Spring Valley	34-0070	1	350	No		110	01-Apr-14	Cyanide, Total	1.13	.65	MO	F	Y
						110	15-Apr-14	pH-Instantaneous	4.1	5-12.5	DM	L	N
Jensen Meat Company Inc 2550 Britannia Bl Suite 101, San Diego	12-0275	3	22288	No		110	29-Apr-14	SMR Late - written notice					
						110	22-May-14	SMR Late - written notice					
						110	27-May-14	SMR Incomplete					
						110	24-Jun-14	SMR Late - written notice					
K-Tube Corporation 13400 Kirkham Wy, Poway	20-0122	1	1738	No		120	28-Apr-14	pH-lowest value	3.7	5	DM	L	N
Kyocera America Inc 8611 Balboa Av, San Diego	06-0058	1	43590	No		130	18-Jun-14	SMR Incomplete					
						140	18-Jun-14	SMR Incomplete					
Pacira Pharmaceuticals Inc 10450 Science Center Dr, San Diego	02-0762	1	3535	Yes	SNC2 - TRC (MO): MthCl 1/2, MthCl 1/3	110	01-Jan-14	Methylene chloride - 40CFR136.3 Table 1F	1880	700	MO	F	Y
						110	15-Jan-14	Methylene chloride - 40CFR136.3 Table 1F	3600	3000	DM	F	N
Spec-Built Systems Inc 2150 Michael Faraday Dr, San Diego	12-0202	1	30	No		110	29-Apr-14	SMR Late - written notice					

Semi-Annual SIU Compliance Status Report

01-Jan-2014 through 30-Jun-2014

SIU Name	IU#	Class	IW Disch	SNC?	[If Yes, Why]	Conn	Violation Date	Description/Parameter	Value	Limit	Period	Cat	TRC
USN; Naval Base Coronado - NASNI NAS North Island, San Diego	08-0018	1	34167	Yes	SNC2 - TRC (DM): SulfD 10/20,SulfD 7/13	100	10-Feb-14	Sulfides, Dissolved	1.5	1	DM	L	Y
						100	10-Mar-14	Sulfides, Dissolved	3.5	1	DM	L	Y
						100	27-Mar-14	Sulfides, Dissolved	1.5	1	DM	L	Y
						100	04-Apr-14	Sulfides, Dissolved	4.5	1	DM	L	Y
						100	10-Apr-14	Sulfides, Dissolved	3.5	1	DM	L	Y
						100	14-Apr-14	Sulfides, Dissolved	7	1	DM	L	Y
						100	08-May-14	Sulfides, Dissolved	4	1	DM	L	Y
						100	10-Jun-14	Sulfides, Dissolved	2.87	1	DM	L	Y
						100	12-Jun-14	Sulfides, Dissolved	4	1	DM	L	Y
						100	25-Jun-14	Sulfides, Dissolved	1.56	1	DM	L	Y
UT; City of San Diego - Storm Water Dept 111 W Harbor Dr, San Diego	11-0534	3	400960	No		110	31-Jan-14	Minimum gals/min thru meter when discharging	57	105	DM	L	N
						110	28-Feb-14	Minimum gals/min thru meter when discharging	94	105	DM	L	N
						120	31-Jan-14	Minimum gals/min thru meter when discharging	54	105	DM	L	N
						120	28-Feb-14	Minimum gals/min thru meter when discharging	48	105	DM	L	N
						210	31-Jan-14	Minimum gals/min thru meter when discharging	55	105	DM	L	N
						210	28-Feb-14	Minimum gals/min thru meter when discharging	94	105	DM	L	N
UT; G & M Oil Company 3774 Main St, San Diego	11-0539	2	1901	No		100	29-Jan-14	SMR Late - written notice					
UT; HPS Mechanical Inc 1900 Avenida De La Playa, La Jolla	04-0489	3	1008000	No		100	25-Mar-14	Delinquent Requirement					
UT; SCS Engineers Inc 101 16th St, San Diego	11-0559	2	14400	No		100	29-Apr-14	SMR Late - written notice					

Semi-Annual SIU Compliance Status Report

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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; T2 Development 2137 Pacific Highway, San Diego	11-0567	2	36000	No		100	30-Jun-14	SMR Incomplete					
UT; TRS Group Inc 11620 Sorrento Valley Rd, San Diego	02-1098	2	72000	No		100	26-Feb-14	Manganese, Total	.41	.05	DM	L	N
						100	26-Feb-14	pH-Instantaneous					N
						100	01-Apr-14	SMR Incomplete - missing lab data					
UT; Transtar Pipeline Inc Harbor & Pacific Hwy, San Diego	09-0987	3	144000	No		100	30-Jun-14	SMR Incomplete					
UT; West Tech 1901 Main St, San Diego	11-0566	2	14400	No		100	27-Jan-14	SMR Incomplete					
UT; Wing Avenue Flood Control Improvement Project 4218 Wing Av, El Cajon	21-0329	2	30000	No		100	22-May-14	SMR Late - written notice					
						100	24-Jun-14	SMR Late - written notice					
Veridiam Inc 1717 Cuyamaca St, El Cajon	16-0348	1	4758	No		110	01-Mar-14	Ammonia (as nitrogen)	14.7	9.03	MO	F	Y

Name	FACILIT	Conn	NOV	Identified	Action	Viol_Date	Fee	Level	
AlSCO Inc	09-0001	100	73992	24-MAR-14	24-MAR-14	27-FEB-14	\$100	Initial notice	
					25-MAR-14	27-FEB-14	\$100	Final notice	
			74123	14-APR-14	14-APR-14	21-FEB-14	\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
	count		3						
	sum					\$250			
AP Precision Metals	12-0144	110	74332	29-APR-14	29-APR-14		\$50	Notice only	
			74368	05-MAY-14	05-MAY-14	31-MAR-14	\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
			count		2				
	sum					\$100			
Chromalloy San Diego	05-0985	130	73062	21-JAN-14	21-JAN-14		\$50	Notice only	
			73148	23-JAN-14	23-JAN-14		\$50	Notice only	
			73149	23-JAN-14	23-JAN-14		\$50	Notice only	
			73150	23-JAN-14	23-JAN-14		\$50	Notice only	
			73151	23-JAN-14	23-JAN-14		\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
			count		5				
	sum					\$250			
Circle Foods LLC	12-0220	110	74071	01-APR-14	01-APR-14	27-FEB-14	\$50	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$50			
Coating Services Group LLC	33-0044	110	73143	21-JAN-14	21-JAN-14	05-DEC-13	\$100	Initial notice	
			73669	10-FEB-14	10-FEB-14	11-DEC-13	\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
			count		2				
	sum					\$150			
CP Kelco	11-0444	430	73929	17-MAR-14	17-MAR-14	18-FEB-14	\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$100			
Cubic Defense Applications Inc	06-0026	160	73335	10-FEB-14	10-FEB-14	19-DEC-13	\$50	Notice only	
			73371	10-FEB-14	10-FEB-14	16-OCT-13	\$50	Notice only	
			73514	10-FEB-14	10-FEB-14	19-DEC-13	\$50	Notice only	
			74263	28-APR-14	28-APR-14	13-MAR-14	\$50	Notice only	
			74635	21-MAY-14	21-MAY-14	13-MAR-14	\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
count		5							
	sum					\$250			
Doncasters GCE Industries	13-0115	410	73391	10-FEB-14	10-FEB-14	29-OCT-13	\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$50			
Emerald Textiles LLC	12-0065	110	74030	26-MAR-14	26-MAR-14		\$50	Notice only	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$50			
General Dynamics NASSCO	11-0051	310	73388	10-FEB-14	10-FEB-14	31-OCT-13	\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$100			
GKN Aerospace Chem-tronics Inc	16-0520	210	73107	21-JAN-14	21-JAN-14	04-DEC-13	\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$100			
Golden State Metal Finishing	34-0070	110	74403	15-MAY-14	15-MAY-14	17-APR-14	\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$100			
Jensen Meat Company Inc	12-0275	110	74334	29-APR-14	29-APR-14		\$100	Initial notice	
			74846	22-MAY-14	22-MAY-14		\$100	Initial notice	
			75063	24-JUN-14	24-JUN-14		\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		3						
	sum					\$300			
K-Tube Corporation	20-0122	120	75004	23-JUN-14	23-JUN-14	29-APR-14	\$100	Initial notice	
			*****	*****	-----	*****	*****	-----	
	count		1						
	sum					\$100			
Kyocera America Inc	06-0058	130	74958	18-JUN-14	18-JUN-14	27-NOV-13	\$50	Notice only	
			140	74959	18-JUN-14	18-JUN-14	27-NOV-13	\$50	Notice only
			*****	*****	-----	*****	*****	-----	

Name	FACILIT	Conn	NOV	Identified	Action	Viol_Date	Fee Level
UT; Wing Avenue Flood Control Improvement Project	21-0329	100	74861	22-MAY-14	22-MAY-14		\$50 Notice only
			75073	24-JUN-14	24-JUN-14		\$50 Notice only
			count	2			
			sum				\$100
Veridiam Inc	16-0348	110	74377	05-MAY-14	05-MAY-14	19-MAR-14	\$0 Initial notice
			74762	21-MAY-14	21-MAY-14	19-MAR-14	\$100 Final notice
			count	2			
			sum				\$100
*****			count	70			
			sum				\$5,075

70 rows selected.

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 is 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 the first half of 2014, all 9 monitoring events (6 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 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, but the IU avoided SNC status. NOVs were issued and the IU indicates it is evaluating whether to install a filtering system ensure consistent compliance. Additional program monitoring has been scheduled for the second half of 2014.

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 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 the first half of 2014, all 5 monitoring events (3 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 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 additional program monitoring has been scheduled for the first half of 2014 to determine whether these actions are sufficient to ensure compliance. In the fourth quarter of 2013 and first half of 2014, all 9 monitoring events (5 by the program) demonstrated compliance and no further enforcement actions are planned.

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 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. Additional program monitoring has been scheduled for the first half of 2014. In the first half of 2014, all 4 monitoring events (2 by the program) demonstrated compliance and 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. Additional program monitoring has been scheduled for the second half of 2014.

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 the first half of 2014, all 4 monitoring events (2 by the program) continued to demonstrate compliance. A penalty order is planned for the second half of 2014.

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

This Navy base 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. NOV's 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 widespread nature of the sewer system and large size of the facility, this may take multiple studies 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 the 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 carrier piers and the Oil Recovery Plant as sources and the actions taken to achieve compliance include treatment with metered chemical (ferrous chloride) injection at lift station 1250 to control hydrogen sulfide levels and increasing the frequency of wet well cleaning. The IU asserts its self monitoring for dissolved sulfides on December 18, 2013 yielding < 0.5 mg/L demonstrates their return to compliance. Several additional steps are being taken to further evaluate upstream sources; establish a standard operating procedure to flush remote lift stations when not operating to prevent stagnation; and award 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 (20 events, 12 by the program) in the first half of 2014 established that the IU remained in SNC status for the six-month periods ending in the first and second 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.

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 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 7 monitoring events including 2 by the program in the first half of 2014, confirmed that compliance was re-established for benzene, and although no further enforcement actions are planned, the permit is being amended to require an Operations and Maintenance SOP for the GAC system to ensure the vessels are adequately changed out in the future.