

City of



**Department of Public Utilities**

Wastewater Management Division  
5607 West Jensen Avenue  
Fresno, California 93706-9458  
559-621-5100 – FAX 559-498-1700  
[www.fresno.gov](http://www.fresno.gov)



*Providing Life's Essential Services*

April 30, 2009

Lonnie Wass  
California Regional Water Quality Control Board  
Central Valley Region  
1685 E Street  
Fresno, CA 93706-2020

APR 27 2009

Dear Mr. Wass:

**SUBJECT: CITY OF FRESNO FIRST QUARTER 2009 PRETREATMENT REPORT**

Enclosed please find one copy of the First Quarter Pretreatment Report for your review. If you have any questions regarding this report, please call me at (559) 621-5130.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosa Lau-Staggs".

Rosa Lau-Staggs  
Chief of Wastewater Environmental Services

Enclosures

c: Stephanie Trotter, State Water Resources Control Board, Division of Water Quality  
Linh Tran, U.S. Environmental Protection Agency  
Lisa Koehn, Public Utilities Department, City of Clovis  
Department of Public Utilities, City of Fresno  
File

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April 30, 2009

Linh Tran  
Regional Administrator  
U.S. Environmental Protection Agency  
Regional IX – Attention W-5  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Tran:

**SUBJECT: CITY OF FRESNO FIRST QUARTER 2009 PRETREATMENT REPORT**

Enclosed please find one copy of the First Quarter 2009 Pretreatment Report for your review. If you have any questions regarding this report, please call me at (559) 621-5130.

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Rosa Lau-Staggs  
Chief of Wastewater Environmental Services

Enclosures

c: Stephanie Trotter, State Water Resources Control Board, Division of Water Quality  
Lonnie Wass, California Regional Water Quality Control Board  
Lisa Koehn, Public Utilities Department, City of Clovis  
Department of Public Utilities, City of Fresno  
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*Providing Life's Essential Services*

April 30, 2009

Stephanie Trotter  
Division of Water Quality  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Trotter:

**SUBJECT: CITY OF FRESNO FIRST QUARTER 2009 PRETREATMENT REPORT**

Enclosed please find one copy of the First Quarter 2009 Pretreatment Report for your review. If you have any questions regarding this report, please call me at (559) 621-5130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rosa Lau-Staggs".

Rosa Lau-Staggs  
Chief of Wastewater Environmental Services

Enclosures

c: Lonnie Wass, California Regional Water Quality Control Board  
Linh Tran, U.S. Environmental Protection Agency  
Lisa Koehn, Public Utilities Department, City of Clovis  
Department of Public Utilities, City of Fresno  
File

CITY OF FRESNO - WASTEWATER MANAGEMENT  
POTW PRETREATMENT QUARTERLY REPORT  
1st QUARTER 2009

NPDES Permit Holder or Sewer Authority Name:

City of Fresno

Report Date:

April 30, 2009

Period Covered by this Report:

January 1, 2009 to March 30, 2009

Period Covered by Previous Report:

October 1, 2008 to December 31, 2008

Name of Wastewater Treatment Plant

Plant No. 1

Reporting Program Number

5-01-254

Person to contact concerning information contained in this report:

Name:

Rosa Lau-Staggs

Title:

Chief of Wastewater Environmental  
Services

Mailing Address:

5607 West Jensen Avenue

Fresno, CA 93706-9458

Telephone Number:

(559) 621-5130

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

SUBMITTED BY:

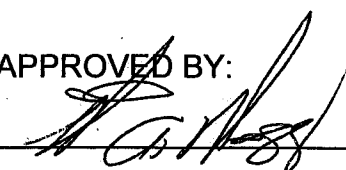


Rosa Lau-Staggs  
Chief of Wastewater Environmental Services

April 21, 2009

Date

APPROVED BY:

  
Stephen A. Hogg  
Assistant Director of Public Utilities-  
Wastewater

April 23, 2009  
Date

City of



# ***1st Quarter 2009 Pretreatment Report***

***Department of Public Utilities  
Wastewater Management Division  
Environmental Services Section***

| <b>JANUARY 2009 ENFORCEMENT</b> |                    |             |                              |                |
|---------------------------------|--------------------|-------------|------------------------------|----------------|
| <b>Industry</b>                 | <b>Constituent</b> | <b>Date</b> | <b>Results</b>               | <b>Samples</b> |
| LiDestri Foods, Inc             | O&G                | 01/15       | Grab Samples<br>Violating    | 3              |
| WCR                             | Metals             | 01/21       | Grab Samples<br>No Violation | 1              |

| <b>JANUARY 2009 CONTINUED COMPLIANCE MONITORING</b> |                    |                |                                    |                |
|---|--------------------|----------------|------------------------------------|----------------|
| <b>Industry</b>                                     | <b>Constituent</b> | <b>Date</b>    | <b>Results</b>                     | <b>Samples</b> |
| Ameripride Uniform Services                         | 601/602            | 01/23          | Grab Samples<br>No Violations      | 4              |
|   | O&G                |                |                                    | 4              |
|   | pH                 |                |                                    | 4              |
| Ano-Tech Metal Finishing                            | Metals             | 01/27<br>01/28 | Composite Samples<br>No Violations | 2              |
| Aramark Uniform Service                             | 601/602            | 01/23          | Grab Samples<br>No Violations      | 3              |
|   | O&G                |                |                                    | 3              |
|   | pH                 |                |                                    | 3              |
| Beef Packers  | O&G                | 01/16          | Grab Samples<br>No Violations      | 4              |
|   | pH                 |                |                                    | 4              |
| California Dairies, Inc.                            | O&G                | 01/15          | Grab Samples<br>No Violations      | 4              |
|   | pH                 |                |                                    | 4              |
| Darling International, Inc.                         | O&G                | 01/15          | Grab Samples<br>No Violations      | 4              |
|   | pH                 |                |                                    | 4              |
| Clovis Specialty Plating                            | Metals             | 01/27<br>01/28 | Composite Samples<br>No Violations | 2              |
| Commercial Electroplating                           | Metals             | 01/27<br>01/28 | Composite Samples<br>No Violations | 2              |
| Foster Farms, Belgravia Plant                       | O&G                | 01/16          | Grab Samples<br>No Violations      | 8              |
|   | O&G                |                |                                    | 8              |
|   | pH                 |                |                                    | 8              |
| Foster Farms Dairy                                  | O&G                | 01/16          | Grab Samples<br>No Violations      | 4              |
|   | pH                 |                |                                    | 4              |

|                      |     |       |                               |   |
|----------------------|-----|-------|-------------------------------|---|
| Foster Farms Poultry | O&G | 01/16 | Grab Samples<br>No Violations | 4 |
|                      | pH  |       |                               | 4 |
| Fruit Fillings       | pH  | 01/15 | Grab Samples<br>No Violations | 4 |

# FIRST QUARTER 2009 REPORT COMMENTS

The fourth quarter 2009 report includes a review of the enforcement and compliance samples for each Class I industry, a summary of the enforcement charges and administrative penalties, and a summary of the compliance status of each Significant Industrial User (SIU) who has been in violation of discharge limits or administrative requirements.

The compliance status terminology consists of Achieved Compliance, Consistently Achieving Compliance, Inconsistently Achieving Compliance, and Significant Noncompliance.

This terminology is defined as follows:

**Achieved Compliance** indicates that an industry successfully completed corrective actions for violations occurring during the previous quarter and was in 100% compliance during the reporting quarter.

**Consistently Achieving Compliance (CAC)** indicates that an industry was in 100% compliance during the reporting quarter.

**Inconsistently Achieving Compliance (IAC)** indicates that an industry was not in 100% compliance during the reporting quarter but did not meet the criteria of Significant Noncompliance.

**Significant Noncompliance (SNC)** as defined in CFR 403.8 is a compliance status in which the industry meets any of the following criteria:

- Violations of Wastewater Discharge Limits
  - a. Chronic Violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average for the same pollutant parameter.
  - b. Technical Review Criteria (TRC) Violations, defined here as those in which thirty-three percent (33%) or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH.
  - c. Any other violation or violations of an effluent limit (average or daily maximum) that the Control Authority believes has caused, alone or in combination with other discharges, interference or pass through, or endangered the health of the POTW personnel or the general public.
  - d. Any discharge of a pollutant that has caused imminent endangerment to human health/welfare or to the environment and resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- Failure to meet, within ninety (90) days after the schedule date, a compliance schedule milestone contained in a local order for starting construction, completing construction, or attaining final compliance.
- Failure to provide reports within forty-five (45) days from the due date
- Failure to accurately report noncompliance.
- Any other violation or group of violations that the Control Authority considers being significant.

The City of Fresno realized a 98% discharge compliance rate for SIUs operating in this quarter, having forty-two out of forty-three discharging SIUs in compliance. For administrative parameters, a 100% compliance rate was realized.

Accordingly, staff issued zero (0) Administrative Violation Notices, and only two (2) Notice of Noncompliance. Cost recovery charges for the quarter were \$1,032.00 in discharge enforcement charges, zero in administrative enforcement charges, and zero in penalties.

In addition to responding to violations, staff has a policy of communication to help SIUs identify and resolve problems before they escalate into a more serious situation. Consequently, there were forty-three (43) Compliance Inspections and two (2) Enforcement Inspections, for a total of forty-five (45) inspections conducted during the first quarter of 2009.

An adequate sampling program is also crucial in monitoring the rate of compliance and, subsequently, the effectiveness of a pretreatment program. In the first quarter of 2009, 347 samples were collected and analyzed for metals, oil and grease, cyanide, and pH. A review of the data reveals that two of the 25 Oil and Grease samples (8%) were in violation, and zero for the other samples.

The City of Fresno is currently operating under the Pretreatment Program as it was approved on 14 January 2004 by the CRWQCB and later revised to address reference changes to the recently updated Fresno Municipal Code and Joint Powers Agreements with the City of Clovis and the County of Fresno. Since that time, a number of changes to the General Pretreatment Regulations and the Fresno Municipal Code have required a third revision to the Pretreatment Program. This includes incorporating Best Management Practices, the FOG (Fats, Oils, and Grease) Program, the Hauled Waste Program, and the updated Enforcement Response Plan. The Pretreatment Program has been completed and will be submitted to the Regional Board for approval in the next quarter.

In order to disseminate the latest information concerning the Pretreatment Program and other issues that might impact the industrial users, regular meetings are being held. These meetings are open to both significant and non-significant industrial users. The first meeting was held in March 2007 and occurs once in each calendar quarter. Topics cover any subject pertinent to the Pretreatment Program and have included the Pretreatment Streamlining Regulations and subsequent local municipal code amendments, local limits, pretreatment system technology, etc. Other areas of interest are also covered including rate increases that were adopted by the City Council and research into forming a special district that will be separate from the City of Fresno. Suggestions are also requested for future meetings.

The first quarterly meeting for calendar year 2009 occurred on 11 February 2009. The agenda included an update to the expansion project going on at the regional facility, a presentation on how to complete wastewater discharge permit applications and flow monitoring reports, and updates on the Enforcement Response Plan and Pretreatment Program revisions.

The City of Fresno and Fresno Metropolitan Flood Control District continue to work in mutual cooperation toward maintaining the Storm Water Program. Pretreatment Program inspections have incorporated Storm Water concerns. Each agency investigates complaints and reports of illegal discharges and will make referrals to the other agency when necessary.

Keeping lines of communication open with the industrial users is always beneficial but a strong public education program is essential to support the Pretreatment Program. As such, the City of Fresno has allocated a substantial amount of funds to promote pollution prevention for the non-regulated dischargers. Previous reports highlighted the various aspects of the different public campaigns including the printed materials and media outreach specifically for the FOG Program and the Seriousness of Salt campaign. During the first quarter of 2009, the City of Fresno had the opportunity to participate in the following:

- Spring Home and Garden Show at the Fresno County Fairgrounds
- A tour of the plant facility by 94 students and their teachers from a local elementary school
- Water, Manufacturing and Food Processing Cluster Meeting and Career Expo

Participating in these events allows for one-on-one communication with the public to discuss the FOG and Salt programs as well as the new statewide campaign concerning endocrine disrupting compounds from pharmaceuticals and personal care products.

CITY OF FRESNO - WASTEWATER MANAGEMENT  
POTW PRETREATMENT QUARTERLY REPORT  
1st QUARTER 2009

**Glossary of Acronyms**

|      |  |
|------|--|
| AC   | Achieved Compliance                    |
| CAC  | Consistently Achieving Compliance      |
| CDO  | Cease and Desist Order                 |
| CMO  | Compliance Order                       |
| CNO  | Consent Order                          |
| ESS  | Environmental Services Section         |
| HWM  | Hazardous Waste Manifest               |
| IAC  | Inconsistently Achieving Compliance    |
| IU   | Industrial User                        |
| NON  | Notice of Noncompliance                |
| PSES | Pretreatment Standards Existing Source |
| PSNS | Pretreatment Standards New Source      |
| SIU  | Significant Industrial User            |
| SMR  | Self-Monitoring Report                 |
| SNC  | Significant Noncompliance              |
| TRC  | Technical Review Criteria              |
| VND  | Violation Notice Discharge             |
| VNA  | Violation Notice Administrative        |
| VNT  | Violation Notice Telephone             |
| WN   | Warning Notice                         |