City of Salinas

Industrial Wastewater Treatment Facility

2023 Annual Report

WDR NO. R3-2004-0066
WDID NO. 3 27011003

SALINAS
RICH IN LAND | RICH IN VALUES

Public Works Department
Environmental & Maintenance Services
Wastewater Division

Report Due
January 31, 2024

CITY OF SALINAS ANNUAL REPORT
COVER SHEET

WDR Holder Authority Name:	City of Salinas
Report Date:	January 31, 2023
Period Covered by This Report:	Jan 1, 2023, through Dec 31, 2023
Period Covered by Previous Report:	Jan 1, 2022, through Dec 31, 2022

Name of Wastewater Plant	**WDR Number**
Salinas Industrial Wastewater Treatment Facility	R3-2004-0066

Person to contact concerning information contained in this report:

Name:	Gary Gabriel
Title:	Wastewater Manager
Mailing Address:	426 Work Street Salinas, CA 93901
Telephone No.:	(831) 758 -7103

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

January 31, 2024

Date

Gary Gabriel
Wastewater Manager

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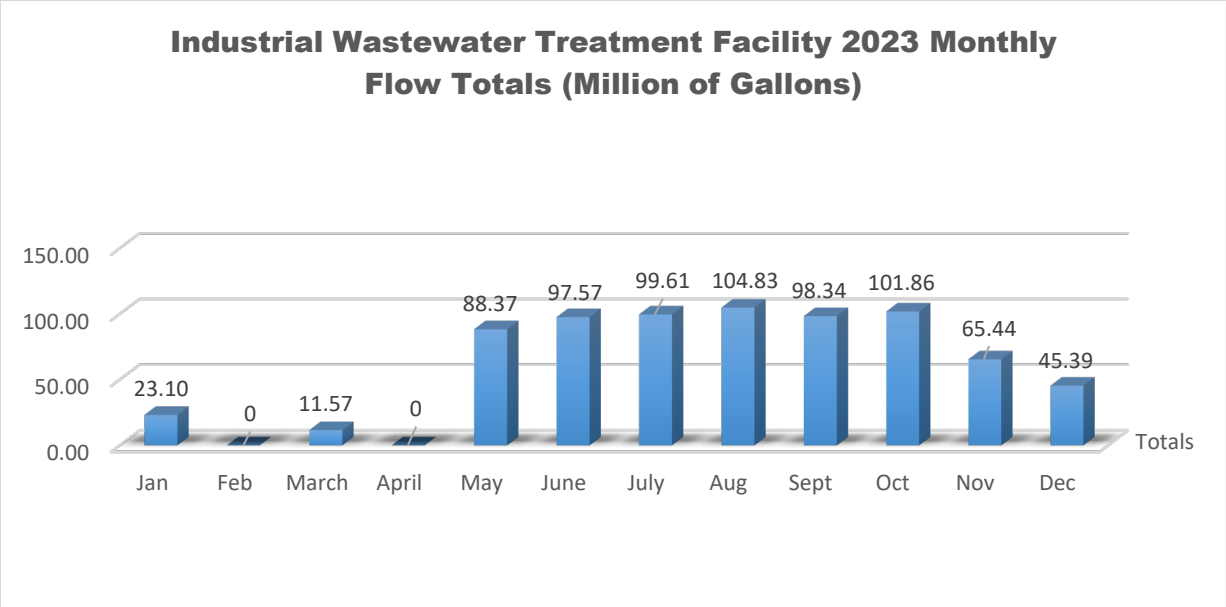
Industrial Wastewater Treatment Facility (IWTF)

NEW FOR 2023

During 2023, the Industrial Wastewater Treatment Facility (IWTF) received and processed 736.08 million gallons of agricultural wastewater. Under a short-term agreement with Monterey One Water (M1W) and the Monterey County Water Resources Agency (MCWRA), 139.97 million gallons (Mgals) of agricultural wastewater was diverted (via the Shunt located at TP-1) and 73.1 Mgals of effluent through Pond 3 Pump Station (P3PS) and then to the Regional Treatment Plant (RTP) between January and September 2023 for water reuse by the Castroville Seawater Intrusion Project (CSIP).



In accordance with the revised Monitoring and Reporting Program (implemented in October 2019) and changes to the City's Waste Discharge Requirements permit, 4.83 million gallons of stormwater were diverted to IWTF in 2023 for reuse.

M1W, in partnership with the City, has now operated the Salinas Storm Water Grant projects (Phases 1A and 1B) for over two years. These projects enable storm water from the City's Salinas River watershed to be diverted to the IWTF when feasible, given trash loading, and the hydraulic capacity limits in the pipeline and the IWTF. More information is provided in the section "A Unique System Introduction and Facility History" below.

On October 31, 2022 Agreement Number D 2112160 was executed for the Salinas Project to Enhance Regional Stormwater Supply (SPERSS) in the amount of $8,799,154 by the State Water Resources Control Board (State Board) Proposition 1 Storm Water Grant Program.

Components of the grant include:

- Modifications to the existing Influent Pump Station (IPS) at the IWTF

- Construction of a new IPS at the IWTF
- Installation of a Trash Capture Unit and Vault Structure
- Segregated Stormwater conveyance using existing infrastructure.

The City has retained E2 Consulting Engineers to design the project. E2 Consulting Engineers and their sub-consultants have been working on the plans and specification which are currently at 60%.

The City, M1W and the Monterey County Water Resources Agency have been actively engaged in negotiations over a long-term usage agreement for industrial wastewater from the Pond 3 Pump Station. Beneficiaries of the recycled water would include CSIP and Pure Water Monterey. The current negotiations were stalled in 2023 due to staffing changes at the City and Monterey County Water Resources Agency.

PROBLEMS EXPERIENCED

There were no outstanding water quality concerns in 2023. Flooding event during early 2023 caused Industrial Wastewater Treatment Facility to be inundated by Salinas River Flooding taking Facility offline till May 2023. See Plant Operations pg. 13 for more detail on flooding event.

A UNIQUE SYSTEM INTRODUCTION AND FACILITY HISTORY

The City of Salinas operates a unique industrial wastewater collection and treatment system. While most municipalities only maintain a Storm Sewer and a Sanitary Sewer System, Salinas maintains a third collection system for a service area on the southern end of the City. The Industrial Wastewater System receives Industrial Wastewater (IW) discharges from 22 industrial users via permitted connections; and conveys the discharge to a treatment plant located along the Salinas River. Separate Sanitary Sewer and Storm Sewer Systems serve the same area to collect municipal sewage and storm water runoff, respectively. Municipal sewage flows are prohibited in the Industrial Wastewater System.

The Industrial Wastewater Treatment Facility (IWTF) has been treating Industrial Wastewater from agriculture-based industries for many years. In an agreement with the City, E.H. Spiegl, a local businessperson, originally began building elements of the facility in 1943, to serve his dehydrated vegetable manufacturing plant that supplied the civilian population and the armed forces during World War II. In accordance with the agreement, ownership and operation of the facility transferred to the City after the war.

Prior to 1966, the facility consisted of a series of percolation ponds covering approximately 20 acres with a percolation capacity of 0.75 MGD. In 1966, the City expanded the facility to 35 acres with 3 acres of anaerobic settling ponds, thus increasing the disposal capacity to 1.5 MGD. During this time, the facility had a difficult time controlling odor generated by the treatment processes.
Under the California Clean Water Grant Program and the Federal Water Pollution Control Act, the City received State and Federal assistance to upgrade the facility, which was completed in 1973. The newly upgraded facility included an aeration lagoon that would enhance treatment and reduce odor problems.

In 1983, Federal Regulations contained in 40 CFR 403 required that a Pretreatment Program be developed and implemented. The City retained James Montgomery Consulting Engineers, Inc. (JMM) to create the Pretreatment Program. The EPA approved the City's new Pretreatment Program in May 1983.

The following year, in 1984, the Central Coast Regional Water Quality Control Board (Regional Board) revised requirements to prohibit discharge of treated water to the Salinas River. To comply with this requirement, construction of a pumping station began in October 1984. Completed in March 1985, this pumping station allowed the discharge of water from Pond #3 to 67 acres of disposal beds. However, the City continued to request the Regional Board's permission to discharge to the river during wet weather when the treatment facility's percolation capacities were reduced.

Responding to the City's request, the Regional Board granted the City a new NPDES permit in 1987, which allowed the City to discharge into the Salinas River when there was 100:1 river water to wastewater dilution.

A threat to the continued operation of the facility arose in 1990-91 when several of the facility's largest users left the area. The loss in revenues obligated the City to consider raising rates to meet operational costs.

In 1992, the Regional Board issued a revised discharge permit. This permit included a higher TDS limit of 1,500 mg/L in recognition of increasing levels of salt in the wells used to supply the industries. Additionally, this discharge permit acknowledged the reduced flows and past pretreatment compliance of the industries and granted some relief on Pretreatment Program reporting requirements.

To help recover revenues lost in 1991, the City completed a collection system expansion project in June 1994 adding almost a mile of Industrial Waste sewer line. This project allowed the connection of three significant volume dischargers that were outside of the City's former service area, thereby improving the financial viability of the IWTF.

In 1995, a 500-year storm event resulted in the flooding of the Salinas River. In addition to damaging the pond levees and roadways, the Salinas River deposited silt into the ponds and disposal beds. For several years after, the City negotiated with the Federal Emergency Management Agency (FEMA) on determining reimbursable costs to repair the facility. Throughout these years, adequate treatment and disposal continued to be accomplished. In 2000, the City began repairs to the damages caused by past storms. Final work on the storm damage repairs was completed in early 2002 that included repair of access roads at the plant and completion of the damaged perimeter fencing.

In 2002, after reviewing the requirements for renewing the City's NPDES permit, and with the Regional Board's recommendation, the City applied for a new Waste Discharge Requirement (WDR) in lieu of a NPDES permit. An NPDES permit is designed to protect the water quality of the receiving water body (the Salinas River). New NPDES requirements would have resulted in a significant increase in required monitoring, along with associated costs.

In 2013, the influent flow was at an annual average of 2.88 MGD. At this rate, the IWTF would have adequate capacity to preclude the need to discharge to the Salinas River. However, throughout the 2011, 2012 and 2013 process seasons, staff noticed a general reduction in percolation rates from the rapid infiltration disposal beds. Staff speculates that the local ground water table may have been at higher levels than had been experienced in the past during that time. Lower percolation rates have

been informally confirmed in conversation with staff from the Toro Park Sanitary Sewer Treatment Facility approximately 1-2 miles upstream of the IWTF. Regional Board staff member, Tom Kukol, had conveyed a similar observation from the City of Soledad Treatment Facility and most recently from Monterey County Water Resources Agency (MCWRA), groundwater data for the area of the Industrial Waste Ponds.

It is uncertain to what extent, if any, Monterey County's Salinas River Diversion Facility, as part of the Salinas Valley Water Project, may have been increasing the water levels in the Salinas River as far up stream as the IWTF. It is also uncertain how increased quantities of water in the Salinas River adjacent to the Facility might be affecting the levels in the local ground water table. The reduced dry weather disposal capacity had left higher than normal levels of water in the facility's major ponds, pending disposal, before the new process season began again in April 2014.

Additionally, several industries have stayed in Salinas instead of moving to Yuma, Arizona during the winter season thus increasing the amount of flow to the facility during the wet weather season. The higher groundwater level and increased flow during the winter months posed a significant challenge for water disposal that continued to be of concern. The City continued to work with the M1W to explore other water reuse opportunities throughout the 2013 process season. The drought conditions improved the winter season conditions at the IWTF facility allowing for better evaporation and percolation properties that are allowing the facility to dry more rapidly than in prior seasons.

In March 2013, the City's Wastewater Manager contacted the CCRWQCB to express concern that the facility was still retaining too much water and would not be prepared to accept the industrial flows over the course of the new process season unless additional disposal area were constructed. In March, City staff constructed a series of rapid infiltration beds adjacent to Ponds 1, 2, and 3 between the ponds and the Salinas River. The disposal beds were in use throughout the 2013 process season and assisted the City in meeting the disposal needs throughout the year.

Because of rising ground waters and reduced percolation rates, the City also petitioned the Regional Board in December 2011 to reduce the freeboard requirement from 2 foot to 1 foot in the 3 major ponds. The Regional Board approved the lesser freeboard with the submittal of a document from a Certified Engineer as to the sound condition of the Industrial Waste Pond levees. The City also petitioned the Regional Board in December 2012 to continue the lesser free board requirement through 2013 and 2014 with submittal of a recertification document from a Certified Engineer as to the condition of the levee system to support the higher freeboard. In a letter dated December 20, 2013, the Executive Officer approved the continued use of the emergency temporary rapid infiltration beds and the one-foot freeboard limit with a requirement to recertify the levees on an annual basis. Because of the conditions at the facility, the need for the extra freeboard has not been an issue since 2013, except for minor concerns during the recent construction of the Salinas Storm Water Phase 1B project.

From 2014 through 2017, IW was diverted to the M1W Regional Treatment Plant (RTP) to supply additional irrigation water to the farmers within the Castroville Seawater Intrusion Project (CSIP). This operational change was due to drought in winters of 2013 to 2017 and the associated lack of water available to (MCWRA's) Salinas River Diversion Facility for crop irrigation within the CSIP area. Such diversions were possible due to agreement between the City of Salinas, M1W and MCWRA to reuse of the Salinas Agricultural Wash Water that was being discharged to the IWTF for disposal. Actual diversion to M1W for reuse was accomplished by shunting the IW into the M1W's existing Salinas Pump Station (SAPS) at Hitchcock Road south of the City of Salinas. The IW was mixed with wastewater from the

sanitary sewer and pumped to the M1W RTP where the water was treated, recycled and distributed for reuse.

In addition, the Pure Water Monterey Groundwater Replenishment (PWM/GWR) Project identified the opportunity to divert urban storm water flows from the southwestern portion of Salinas to the RTP for treatment and recycling. The storm water flows previously passed adjacent to the (SAPS) and discharged to the Salinas River. To most efficiently use all available sources and meet recycled water demands, the PWM/GWR Project included several Salinas Water components designed to divert storm water to the IWTF, and to divert IW (before or after treatment) and comingled with storm water to the M1W RTP.

The Industrial Wastewater Diversion Project, completed in 2016, allows IW flows to be diverted directly to the M1W's SAP where it is quantified and monitored for quality. From SAPS the flows are then conveyed to the RTP typically during peak recycled water demand months (April through October). This project also included construction of an emergency wastewater bypass system to allow mixed wastewaters to flow to the IWTF instead of to the Salinas River in the event of a catastrophic failure at the M1W SAPS.

In October of 2017, M1W received the executed Salinas Area Storm Water Grant agreement. This grant project included capturing and conveying storm water, dry weather runoff, and agricultural tile drain water to the RTP through the construction of diversion structures, pump stations, and conveyance pipelines as part of the larger regional PWM/GWR Project. The grant agreement included the Salinas Storm Water (SSW) Grant Projects: The Salinas Dry Weather Flow Diversion (Phase 1A) and the Salinas Treatment Facility Storage and Recovery (Phase 1B). Construction was substantially complete and the new facilities operational by December 2020.

An agreement between M1W and the City, approved on June 4, 2019, granted M1W the right to access and construct the grant funded infrastructure at the IWTF and at the City's TP1 site. An additional agreement in October 2020, provides M1W right of entry and ability to operate the SSW Projects (Phases 1A and 1B) in accordance with the relevant grant agreement.

In June 2022, the City approved agreements with consultants to make improvements to the IWTF to accept and treat larger quantities of IW and to enhance the ability to recycle IW. On December 13, 2022 the City adopted a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the proposed Salinas Industrial Wastewater Treatment Facility Improvements Project. The project is comprised of four Capital Improvement Projects: (1) the Aeration Lagoon Improvements Project; (2) the Pond Automation/Distribution and Pond 3 Pump Station Project; (3) the Variable Frequency Drives (VFDs) and Backup Power Project; and (4) the Airport Lift Station Project. In 2023 the plans for the project have moved to the 90% level and the City is currently looking into financing for the project. Once financing is finalized the project is expected to be bid in the first quarter of 2024.

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WASTEWATER TREATMENT PROCESS

All wastewater entering the facility must pass through a bar screen at the influent pumping station. The station includes three identical 4.0-MGD pumps that can handle the design peak flow of 6.8 MGD. Piping and valves allow the direct pumping to the aeration lagoon, the percolation ponds, and the disposal beds. Subsequent flow within the facility is by gravity except for water pumped from Pond #3 to the disposal beds.

Treatment is achieved in a facultative aeration lagoon. The lagoon is maintained aerobic to at least a third of the water depth with the help of twelve 50-horsepower surface aerators. Natural anaerobic decomposition then completes treatment with the breakdown of settled solids in the lower layer of the lagoon. The aeration lagoon was designed with a water surface of 13 acres and a depth of 10 feet. It was originally sized to hold an average design flow of 4.0 MGD for 10 days. With the increased freeboard requirements in the current permit, detention time is estimated to be nine days.

Treated effluent is disposed of in three percolation/evaporation ponds in series, along with 54 rapid infiltration-drying beds. The total surface area of these ponds is 110 acres, and the drying beds contain 67 acres. Water depth in the ponds ranges from five to 8 feet, when filled to capacity. Water levels are required to be kept at 24-inches of freeboard in all three ponds and in the aeration lagoon.

The 54 shallow rapid infiltration disposal beds are alternately loaded with water for rapid disposal by percolation and evaporation. When in use, the beds have a design disposal rate of 1.7 MGD.

STAFF AND ORGANIZATION

Public Works, Engineering, Environmental & Maintenance Services Division

The IWTF is part of the Wastewater Division of Salinas Public Works, which is also charged with the maintenance of the City's sanitary and storm sewer lines. The Wastewater Manager is involved in matters that require consulting firms and dealing with regulatory agencies such as State Water Resources Control Board (SWRCB), Regional Board, Environmental Protection Agency (EPA) and Department of Homeland Security (DOHS). The collections systems unit, the other branch of the Wastewater Division, also provides support for the IWTF in some areas of maintenance and repairs. The Street Maintenance and Fleet/ Equipment Maintenance Divisions personnel also support the IWTF operation as needed.

The IWTF is managed as an enterprise operation under the City of Salinas Public Works Department with the support of the Wastewater Division of Environmental & Maintenance Services and with assistance from the Engineering & Traffic Division (E&T). E&T currently has on its staff, four engineers licensed in the State of California. The City engineering staff provides planning and development decisions that affect the IWTF. They also provide input and recommendations on matters such as repairs, construction inspection and major construction.

OPERATIONS AND MAINTENACE (O&M)

City staff that oversee operations at the IWTF consist of one (1) Wastewater Operator with Grade II certification. The Wastewater Operator is registered as the Chief Plant Operator, which is responsible for reporting and oversight of the City of Salinas's IWTF. The Chief Plant Operator is also responsible for training and oversite of the two (2) O.I.T's (Operators in Training). During this reporting period one of the OIT's obtained their Wastewater Treatment Plant Operator Certificate through the State of California Water Resources Control Board. Bringing the total to two (2) certified plant operators at the I.W.TF. M1W continues to provide support in the form of inspection of industrial user sites, sample collection for billing, and identifying compliance issues at the various Industrial sites, to maintain compliance with the City's Permit obligations and approved Pretreatment Program.

The City's Treatment Plant Grade II, Chief Plant Operator is registered with the SWRCB and oversees the operations and maintenance (O&M) activities at the IWTF. The Chief Plant Operator and Operators in Training (O.I.T's) at the facility report to the Wastewater Manager. The operators' goal is to determine and provide optimal treatment effectiveness and efficiency. Operational duties include flow and load monitoring, dissolved oxygen control, hydraulic loading control for the ponds, and the monitoring and evaluation of wastewater treatment efficiencies. The treatment plant operators are also responsible for meeting the requirements of the facility's (WDR) Permit.

Typical maintenance duties include scheduled maintenance of electrical systems, repair and maintenance of pumps, reinforcement of levees and percolation ponds when needed, disking of rapid infiltration beds, drying beds, weed control and water distribution through the plant. M1W operates and maintains its infrastructure at TP1 and at the Salinas IWTF in accordance with the City's permit and the agreements between M1W and the City.

Operation and Maintenance Manual

The City of Salinas IWTF O&M Manual was updated July 2022 and was reviewed during the 2023 season no changes took place in 2023.

PRETREATMENT PROGRAM AND LABORATORY ANALYSIS

The City has continued to contract the Industrial and Commercial Source Control Inspections and Monitoring Program, including IWTF Compliance monitoring, to M1W.

The goal of the Source Control Inspection and Monitoring Program is threefold: 1) to identify and monitor Industrial Users whose wastewater may cause by-pass, upset, and/or interference of treatment plant operations; 2) prevent violations of the Facility's WDR due to discharges from industrial users and 3) protection of the health and safety of workers through control and prevention of hazardous materials discharged to the facility.

To accomplish these ends, the Source Control Inspector exacts compliance from dischargers under the legal authority of local, State and Federal regulations. Routine compliance inspections and compliance monitoring is conducted throughout the year. Samples collected are either processed in the field (Temperature, Chlorine, and pH) or may be sent to a State-Certified commercial laboratory. Independent State-certified laboratories conduct wastewater analysis on semi-annual monitoring and compliance monitoring samples. Much of the facility's analysis is currently conducted at contract laboratories as listed below.

List of the laboratories used by the Discharger to monitor compliance:

MBAS Monterey Bay Analytical Services ELAP #2385	4 Justin Court, Suite D Monterey CA, 93940 (831) 375-6227 Fax: (831) 641-0734 WWW.MBSAinc.com
WECK Laboratories Inc. ELAP-CA #1132 ● EPA-UCMR #CA00211 ● Guam-EPA #17-008R ● HW-DOH # ● ISO 17025 #L2457.01 ● LACSD #10143 ● NELAP-CA #04229CA ● NELAP-OR #4047 ● NJ-DEP #CA015 ● NV-DEP #NAC 445A ● SCAQMD #93LA1006	14859 Clark Avenue City of Industry CA, 91745 (626) 336-2139 Fax: (626) 336-2634
Fruit Growers Laboratory, Inc. dba FGL Environmental ELAP-CA #1573	853 Corporation Street Santa Paula CA 93060 (805) 392-2023 Fax: (805) 525-4172

STAFFING SUMMARY

CITY OF SALINAS
DEPARTMENT OF PUBLIC WORKS
INDUSTRIAL WASTEWATER TREATMENT FACILITY

Position Title	Name	State/CWEA Certification Number	* Certification
ENGINEERING STAFF			
City Engineer	Adriana Robles	C 69142	E
Senior Engineer	Brian Frus	C 52282	E
WASTEWATER DIVISION			
Wastewater Manager	Gary Gabriel	1308215678	CWEA Grade II C
OPERATIONS/ MAINTENANCE, LABORATORY/ PRETREATMENT			
City/Chief Plant Operator, Wastewater Operator Treatment Plant Operator	Ambika Prasad	41550	Grade II C
City/Wastewater Operator Treatment Plant Operator	Eric Ruloph	77901	Grade I C
City/ Wastewater Operator in Training	James McGann Jr.	O.I.T-I	C
M1W/Environmental Compliance Inspector II	Juan Arreguin	II-111242003 I-1308211179	CWEA ECI Grade II
M1W/Environmental Compliance Inspector I	Marshall Compton	I-1308235271	CWEA ECI Grade II

During the time period covered by this report the facility was operated under the license of the City of Salinas

*Key to Certification Categories
(O) Operations
(L) Laboratory
(EC) Environmental Compliance
(E) Engineering
(C) Collection Systems

2023 Annual Summary

PLANT OPERATIONS

Operations/Maintenance Summary

The IWTF received flows from the Industrial users based on 9 months of operation in 2023 due to flooding events in January and March 2023. The IWTF average daily flow for 2023 was 2.00 MGD which reflects a decrease of 0.06 MGD from 2022. M1W diverted 131.97 million gallons during 2023 primarily due to flooding events of January and March to assist with managing Industry water while the Industrial Wastewater Treatment Facility was offline. During this period (March. -May 2023) all industry water was shunted to M1W Salinas pump station.

During 2023 the Industrial Wastewater Treatment Facility was inundated by flood waters due to January and March storm events which caused the Salinas River to rise and flood the facility. This is the first time since the 1995 floods that the Industrial facility was taking offline due to flooding. Monterey One Water and the City worked together to keep the industries in operation by shunting industry water through the Salinas Pump Station until dewatering of the flood water from the ponding system was completed. The Industrial Wastewater Treatment Facility began taking water in May and continued through December. Over the past year repairs were undertaken to fix eroded levees on the northside of pond one and pond two. Staff rehabilitated the rapid infiltration beds and build up dirt berms along the river during 2023. During 2023 Carollo was retained to work with the City on two projects from the 2023 floods. The sediment removal project which will remove sediment from the ponding system to reestablish the percolation of the ponds. And the levee repair project to address eroded levees and damage to the drying beds. Both projects are projected to start in the spring of 2024. Pictured below flooding that occurred January and March of 2023.

During 2023 as part of the Storm Water Grant Phase 1A stormwater was diverted to the IWTF for storage and water reuse. M1W diverted stormwater during 2023 for a total recapture of 4.83 million gallons. Due to flooding event in January and March dry weather diversions were suspended due to freeboard in the ponding system.

SUMMARY OF TREATMENT FACILITY VIOLATIONS

The IWTF became completely inundated with floodwaters from the Salinas River on March 13, 2023. To get the IWTF operating the river water needed to be removed from the ponds. Starting on April 7, 2023, water was pumped into the Rapid Infiltration Beds, which overflowed to the Salinas River. Weekly reports were sent to the Central Coast Regional Water Quality Control Board through July 7, 2023, reporting the discharges to the Salinas River.

TRAINING

During 2023 City employees received H2S monitoring training, annual pesticide application training including hazardous material spills and cleanup, Confined Space training and Emergency Response. Training for City employees also includes monthly tailgate safety meetings that have included collection system safety and hazardous spill response. During 2023 the Overflow Emergency Response Plan (OERP) was replaced with the required Spill Emergency Response Plan (SERP). SERP training was provided to staff during 2023 as ongoing training for spill mitigation and response.

All M1W Source Control staff members are trained and annually recertified in CPR, First Aid, Confined Space, Fire extinguisher, Traffic/Roadway Safety, Chlorine Safety, and Haz-Mat training. All are certified as Haz-Mat first responders, are members certified by the California Water Environmental Association (CWEA) and have been trained in the appropriate FEMA training modules.

Source Control Inspection and Monitoring Program

There are currently 22 industries on the City roster of industrial users. All these Industrial Users have been issued and hold wastewater discharge permits in accordance with the same Federal, State and local regulations that establish the legal authority for the IWTF regulatory function. Inspections and discharge monitoring activities conducted regularly by the IWTF personnel are adequate for the protection of personnel, receiving waters and the treatment facility.

Any Industrial user is considered a significant industrial user (SIU) if; a) The discharge is determined categorical, b) average discharges are at or greater than 25,000 gallons per day of “process wastewater” (excludes non-contact cooling water and boiler blow down wastewaters), c) the industry contributes a process waste stream which makes up five percent or more of the average dry weather hydraulic or organic loading capacity, or d) has a reasonable potential, in the opinion of the Control or Approval Authority, to adversely affect the treatment plant (40 CFR 403.3 (t) (ii)). A SIU is required to conduct self-monitoring semi-annually. The City, through a contract with M1W provides sampling services for these requirements as an option for the industrial users. There are currently 10 SIUs in the City’s system.

SUMMARY OF PRETREATMENT ACTIVITIES

The majority of Industrial Users from last year remained in the system. Most of the IWTF users are fresh vegetable processors, packers, and coolers. Included in this group are the fresh-pack salad producers that continue to be the fastest growing segment of the City's users. Chlorinated effluent, ammonia refrigerant, solids, and hydraulic oil spills typify the general concerns with their process wastewater.

Two box companies comprise the next group of users. These companies manufacture corrugated cardboard containers using prefabricated rolled paper and use ink and waxes in the process of labeling and finishing the boxes. Control of heavy metals, hydraulic oil spills, wax and starch spills, high TDS, varying pH, and slug discharges are the chief concerns from this group.

Monterey Fish Company is the sole processor of seafood at one main facility. During 2023, squid and anchovies were the main products that were frozen and packaged. From this seafood facility, the City specifically monitors BOD, screening, and sanitation processes. High Sodium, Chloride, TDS, pH, and FOG (Fats, Oil & Grease) are concerns of this industry.

SUMMARY OF COLLECTION SYSTEM MANAGEMENT PLANS

The Sanitary System Management Plan (SSMP) for the Industrial Waste system was audited on August 24, 2022, and the plan was revised and completed on October 1, 2022. The Industrial Waste SSMP was uploaded to the CWIQS database on November 11, 2022. During 2023 staff reviewed SSMP and plan to have SSMP audited by required audit due date of 5/2/24 per General Order.

PRETREATMENT ANNUAL REPORT

POTW Name: SALINAS, CITY OF

WDR: R3-2004-0066

Period Covered By This Report: 1-1-23 (PSSD) 12-31-23 (PSED)

Number of SIUs in SNC With Pretreatment Compliance Schedule:	0	(SSNC)
Number of Notices of Violation and/or Administrative Orders Issued Against SIUs:	0	(FENF)
Number of Civil & Criminal Judicial Actions Against SIUs:	0	(JUDI)
Number of SIUs with Significant Violations Published:	0	(SVPU)
Number of Industrial Users from Which Penalties Have Been Collected:	0	(IUPN)

INFILTRATION/INFLOW

In October of 2003, the City completed televising approximately 80% of the Industrial Waste pipeline. The resulting data confirmed pipeline sizes, flow capacity and pipeline condition to determine the potential for inflow and infiltration. With the exception of minor groundwater infiltration at two buried manhole locations between the Hitchcock Road facility and the influent pump station at the treatment ponds. No other infiltration was observed. This pipeline has recently been replaced with HDPE pipe upsized from 33 inches to 42 inches.

Inflow into the facility appears to be attributable to drains in open areas at the industrial facilities that are intended to capture cooling water or water used in various processes for discharge to the IWTF. These same drains act as storm water drains during periods of rainfall. Several facilities with major storm water runoff discharges have installed diversion valves that are kept in the Industrial Waste mode during the production months and then switched to the storm water mode during non-production winter months. Pretreatment staff has identified these drains and require the industries to take corrective action to ensure that the diversion valves are in the proper mode dependent on the time of season and process operations that are still in place. These storm pipelines are to be professionally cleaned or flushed with the equivalence of ½ inch of rainfall before the lines used for process flow can be diverted back to the storm water collection system. Staff also participates in plan reviews for upgrades, changes in process or new construction to minimize infiltration and inflow impacts to the facility from the industrial users.

SALT MANAGEMENT

The salt monitoring program has been primarily used as an opportunity to educate users regarding salt management and its impact on the IWTF. During 2023, this continued during site visits and annual inspections when operations have been observed that may contribute to salt loading from the facility. This generally is addressed verbally on site with appropriate staff members of the facility with follow-up requirements issued on an inspection form that necessitates the facility making improvements or changes. Several options are given to the facility to reduce the amount of sodium being discharged to the Industrial Wastewater Collection and Conveyance System. Replacing outdated timer-style water softener units with high efficiency flow or hardness sensor style units, substituting potassium chloride salt for sodium chloride salt, utilizing a portable exchange water softener service, and utilizing all the salt slurries prepared for icing of product containers, thus eliminating discharge of unused portions to the industrial sewer system. Several of these industries have already made process changes or installed new equipment that has lowered the discharge concentration from their facilities. Pretreatment staff members will continue to work with the industries to keep pollutant concentrations as low as possible to ensure the maximum efficiency of the IWTF and improve water quality diverted for reuse to the M1W RTP.

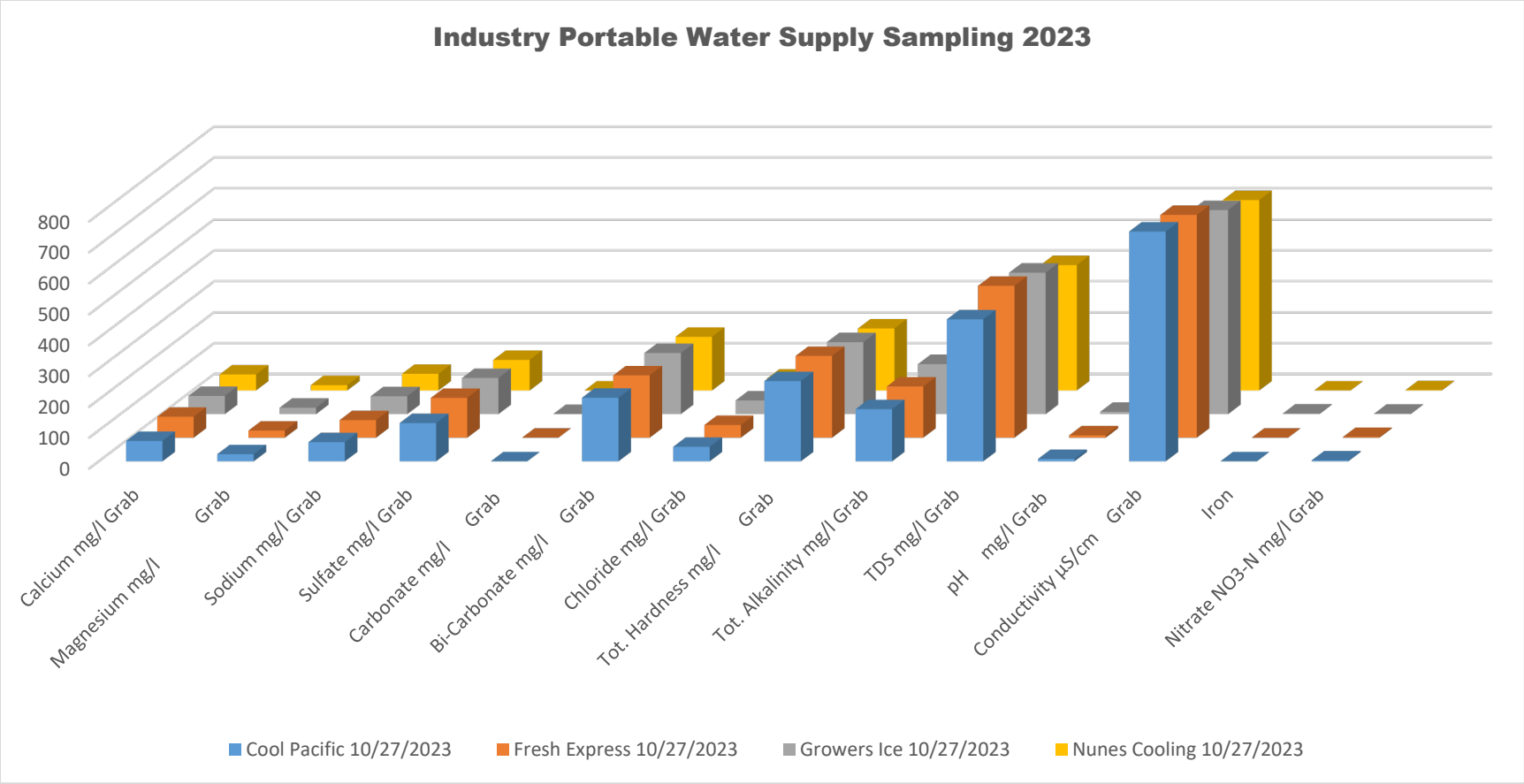
WATER SUPPLY MONITORING

During 2023, the City conducted sampling of the City's Potable Water Supply to determine background pollutant levels. Supply water for most of the Industrial Users comes from several wells operated by California Water Service. In lieu of sampling the wells directly, samples were collected from several industries that would be representative of the water blend seen from the different wells. In addition, the one private well for the Grower's Ice complex was sampled directly. The analytical results for this monitoring can be found in the following tables:

INDUSTRY POTABLE WATER SUPPLY SAMPLING 2023

		Calcium mg/l Grab	Magnesium mg/l Grab	Sodium mg/l Grab	Sulfate mg/l Grab	Carbonate mg/l Grab	Bi-Carbonate mg/l Grab	Chloride mg/l Grab	Tot. Hardness mg/l Grab	Tot. Alkalinity mg/l Grab	TDS mg/l Grab	pH mg/l Grab	Conductivity µS/cm Grab	Iron mg/l Grab	Nitrate NO_3-N mg/l Grab
Location	Sample Date	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)	Annual (Oct)
Cool Pacific	10/27/2023	66	23.1	62	124	ND	206	47.1	260	169	460	7.7	744	0.01	3.1
Fresh Express	10/27/2023	68	23.1	57	129	ND	202	41.3	265	166	492	7.8	721	ND	2.3
Growers Ice	10/27/2023	59	20.6	58	117	ND	198	44.2	233	162	458	7.7	660	2.01	1.4
Nunes Cooling	10/27/2023	52	17.2	54	99	ND	174	38.5	201	143	406	7.7	616	ND	0.9

Result indicates Not Detected (ND)


Industry Portable Water Supply Sampling 2023
800
700
600
500
400
300
200
100
0
Calcium mg/l Grab
Magnesium mg/l
Grab
Sodium mg/l Grab
Sulfate mg/l Grab
Carbonate mg/l
Grab
Bi-Carbonate mg/l
Grab
Chloride mg/l Grab
Tot. Hardness mg/l
Grab
Tot. Alkalinity mg/l Grab
TDS mg/l Grab
pH
mg/l Grab
Conductivity µS/cm
Grab
Iron
Nitrate NO3-N mg/l Grab
Cool Pacific 10/27/2023
Fresh Express 10/27/2023
Growers Ice 10/27/2023
Nunes Cooling 10/27/2023

CITY OF SALINAS IWTF INDUSTIAL USER ROSTER AS OF 12/31/23

Name	Location	Type of Industry	SIU	Compliance Status
Braga Fresh Foods	1347 Harkins Rd.	Non- Categorical	No	A
Central Coast Cooling, LLC	1107 Merrill St.,1069 & 1166 Growers St.	Non- Categorical	NO	A
Cool Pacific Land Company	1160 Terven Ave.	Non- Categorical	YES	A
Dandy Cooling Company	1252 Growers St.	Non- Categorical	NO	A
Fresh Express, Inc.	900 E. Blanco Rd.	Non- Categorical	YES	A
Fresh Express, Inc. (Merrill St. Plant)	1341 Merrill St.	Non- Categorical	NO	A
General Farm Investment Company	1037 Abbott St.	Non- Categorical	NO	A
GreenGate Fresh, LLLP	1222 Merrill St.	Non- Categorical	YES	A
Growers Ice Co.	1050 Growers St.	Non- Categorical	NO	A
International Paper Company	1345 Harkins Rd.	Non- Categorical	NO	A
Ippolito International, LP	1107 & 1155 Merrill St.	Non-Categorical	YES	A
Del Monte Fresh/Mann Packing Co.	1230 Hansen St.	Non- Categorical	YES	A
Monterey Fish Company	960 S. Sanborn Rd.	Non- Categorical	NO	A
Nunes Cooling, Inc.	930 Johnson Ave.	Non- Categorical	NO	A
Organic Girl, LLC	900 Work St.	Non-Categorical	YES	A
Smart Wash Solutions	1129 Harkins Rd.	Non- Categorical	NO	A
Taylor Farms California, Inc. (Abbott St. facility)	1207 Abbott St.	Non- Categorical	Yes	A
Taylor Farms California, Inc. (1225 Abbott St. facility)	1225 Abbott St.	Non- Categorical	NO	A
Taylor Farms California, Inc. (1085 Abbott St. facility)	1085 Abbott St.	Non- Categorical	NO	A
Taylor Farms California, Inc. (Schilling Plant)	1400 Schilling Pl.	Non- Categorical	YES	A
Taylor Farms Retail, Inc.	1275 Hansen St.	Non- Categorical	YES	A
Titan Frozen Fruit	950 S. Sanborn Rd.	Non- Categorical	YES	A
WestRock Company	1078 Merrill St.	Non- Categorical	NO	A

*Growers Ice Co. (1050 Growers St.): Industry no longer in operation; facility was sold, and Permit was deleted.

* Mann Packing Co. (1250 Hansen St.): Industry changed name; now operating as *Del Monte Fresh/Mann Packing*. New address is 1230 Hansen St.

* Taylor Farms California, Inc. (Abbott St. Facility): Industry's facility was rebuilt and back in operation in 2023. New Industrial Wastewater Discharge Permit issued.

Compliance Status Code:

A Consistently achieving compliance

B Inconsistently achieving compliance

C Significantly violated pretreatment requirements

D On a compliance schedule

E Not achieving compliance and not on a compliance schedule

F Compliance Status Unknown

Appendix A

2023 Annual Summary of IWTF Sampling and Analysis

	Annual Average	Annual Average
Parameter	**Influent**	**Effluent**
Monthly		
Flow	*2.00 MGD*	
BOD	*339.89 mg/L*	*6.33 mg/L*
Setteable Solids		*ND*
TSS	*11.89 mg/L*	*57.44 mg/L*
TDS	*998.11 mg/L*	*656.88 mg/L*
Total Haloacetic Acids	*Appendix B*	*Pollutant Monitoring*
Total Trihalomethanes	*Appendix B*	*Pollutant Monitoring*
Quarterly	**Influent**	**Effluent**
Sodium	*125.33 mg/L*	*144.67 mg/L*
Chloride	*133.73 mg/L*	*161.67 mg/L*
Sulfate	*120.33 mg/L*	*128.33 mg/L*
Nitrate or Nitrite + Nitrate	*5.75 mg/L*	*0.8 mg/L*
Total Kjeldahl Nitrogen (as N)	*8.77 mg/L*	*2.67 mg/L*
Total Nitrogen (as N)	*19.87 mg/L*	*4.13 mg/L*
Total Residual Chlorine	*2.31 mg/L*	*ND*
Semiannually		
Metals	*Appendix B*	*Semi Annual Monitoring*
Aluminum	*Appendix B*	*Semi Annual Monitoring*

Annually	Influent	Effluent
Total Phosphate (as P)		*24.3 mg/L*
Orthophosphate		*19 mg/L*
Carbonate		*ND*
Bicarbonate		*206 mg/L*
Calcium		*50 mg/L*
Magnesium		*29.4 mg/L*
Potassium		*42.7 mg/L*
Total Coliform		*>24200 mg/L*
Oil and Grease		*ND*
Cooper		*ND*
Pesticides		*ND*

Result indicates Not Detected (ND)

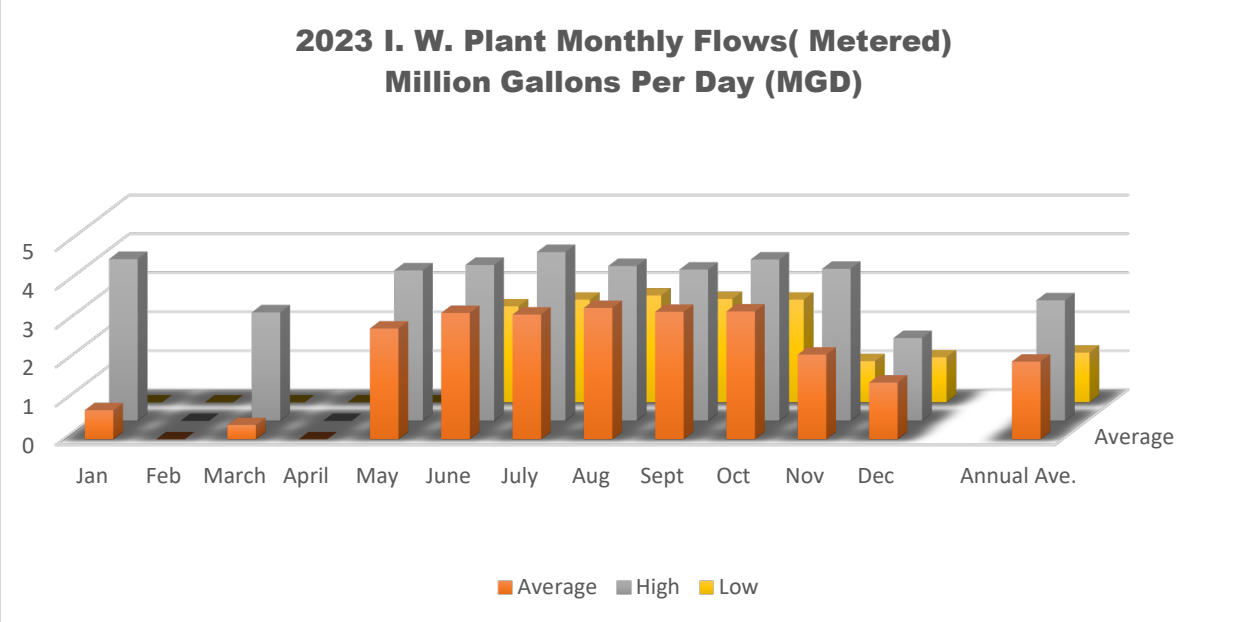
APPENDIX B

SUMMARIES OF ANALYTICAL RESULTS

Flow Monitoring Monthly

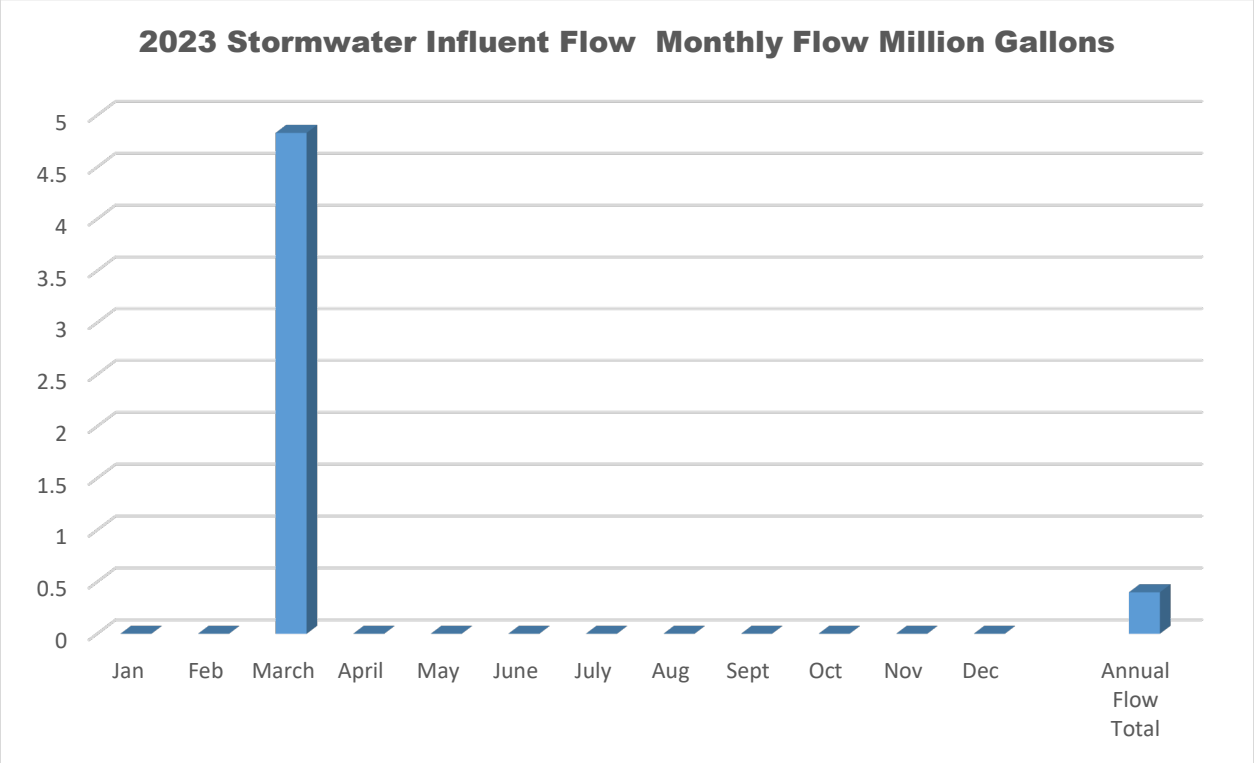
2023 I.W. Monthly Flows

Month	Average	Max Peak Daily flow	Low
Jan	0.75	4.16	0
Feb	0	0	0
March	0.37	2.79	0
April	0	0	0
May	2.85	3.87	0
June	3.25	4.01	2.47
July	3.21	4.34	2.64
Aug	3.38	3.98	2.75
Sept	3.28	3.89	2.66
Oct	3.29	4.15	2.64
Nov	2.18	3.91	1.06
Dec	1.46	2.13	1.16
Annual Ave.	**2.00**	**3.10**	**1.28**



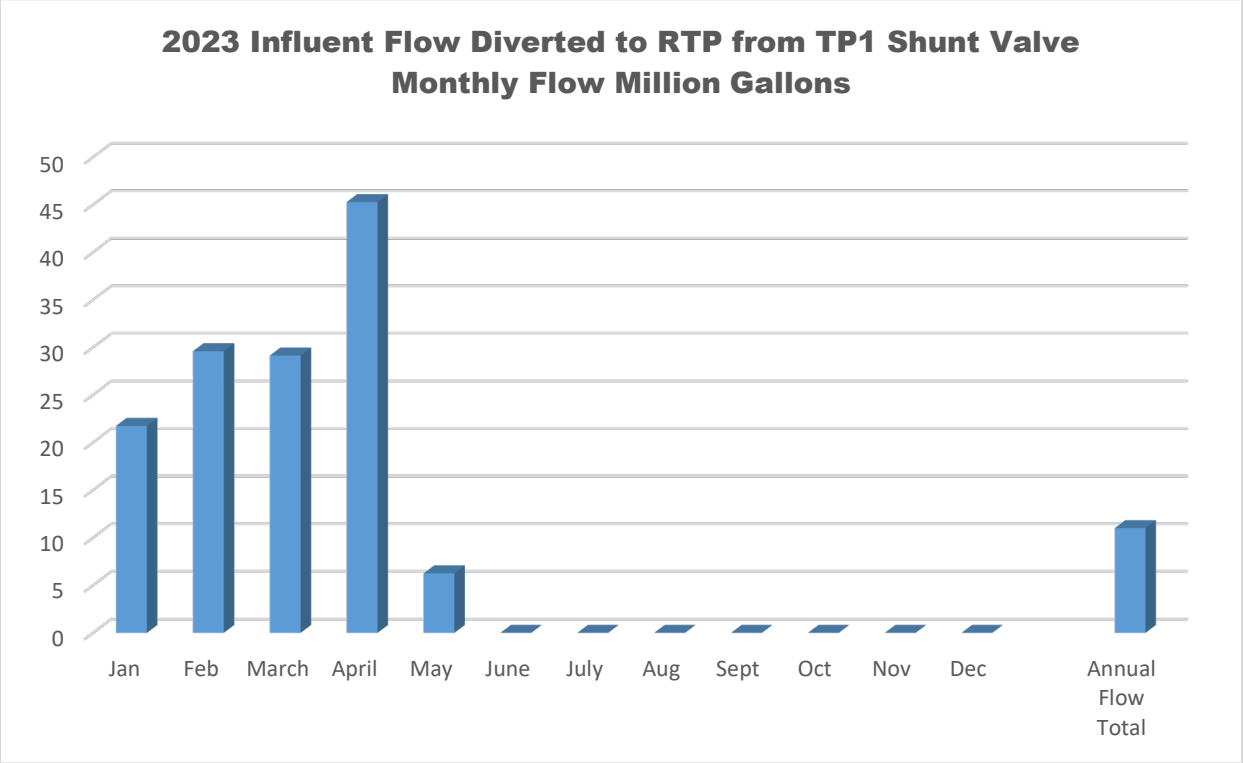
Stormwater Influent Flow

Month	Monthly Flow Million Gallons	*Frequency*
Jan	0	*Monthly*
Feb	0	*Monthly*
March	4.83	*Monthly*
April	0	*Monthly*
May	0	*Monthly*
June	0	*Monthly*
July	0	*Monthly*
Aug	0	*Monthly*
Sept	0	*Monthly*
Oct	0	*Monthly*
Nov	0	*Monthly*
Dec	0	*Monthly*
Annual Flow Ave.	**0.40**	



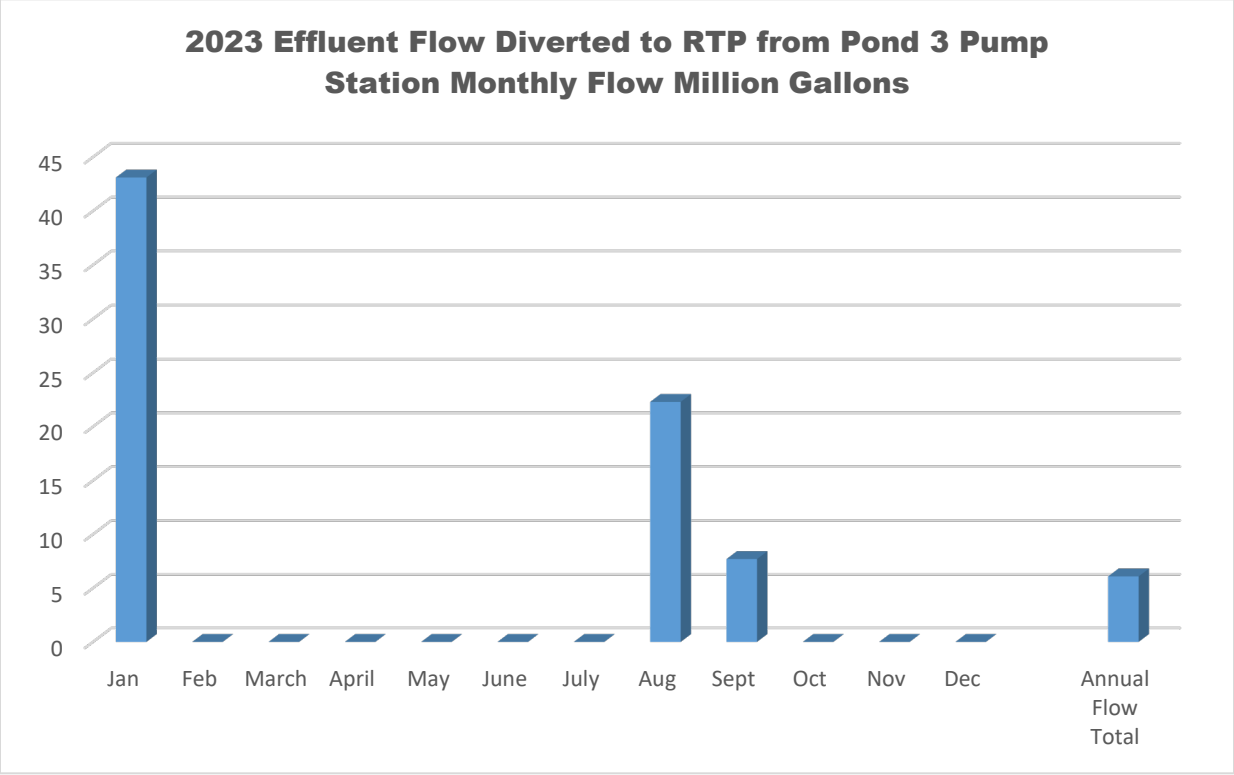
Influent Flow Diverted to RTP from TP1 Shunt Valve

Month	Monthly Flow Million Gallons	*Frequency*
Jan	21.74	*Monthly*
Feb	29.58	*Monthly*
March	29.13	*Monthly*
April	45.27	*Monthly*
May	6.25	*Monthly*
June	0	*Monthly*
July	0	*Monthly*
Aug	0	*Monthly*
Sept	0	*Monthly*
Oct	0	*Monthly*
Nov	0	*Monthly*
Dec	0	*Monthly*
Annual Flow Ave.	**11.0**	



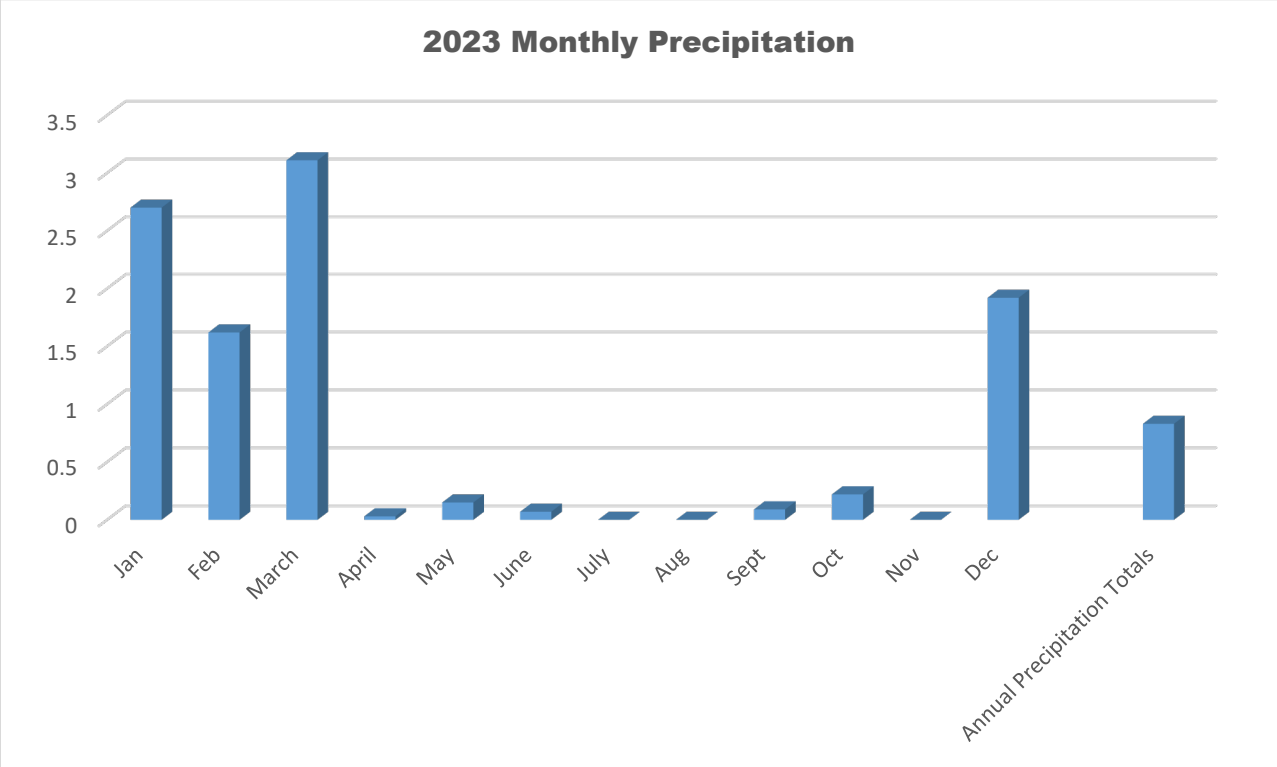
Effluent Flow diverted to RTP from Pond 3 Pump Station

Month	Monthly Flow Million Gallons	*Frequency*
Jan	43.1	*Monthly*
Feb	0.00	*Monthly*
March	0.00	*Monthly*
April	0.00	*Monthly*
May	0.00	*Monthly*
June	0.00	*Monthly*
July	0.00	*Monthly*
Aug	22.3	*Monthly*
Sept	7.70	*Monthly*
Oct	0.00	*Monthly*
Nov	0.00	*Monthly*
Dec	0.00	*Monthly*
Annual Flow Ave.	**6.09**	



Precipitation

Month	Monthly Precipitation Inches	*Frequency*
Jan	2.7	*Monthly*
Feb	1.62	*Monthly*
March	3.11	*Monthly*
April	0.03	*Monthly*
May	0.15	*Monthly*
June	0.07	*Monthly*
July	0	*Monthly*
Aug	0	*Monthly*
Sept	0.09	*Monthly*
Oct	0.22	*Monthly*
Nov	0	*Monthly*
Dec	1.92	*Monthly*
Annual Precipitation Ave.	**0.83**	



2023 Pollutant Monitoring Monthly

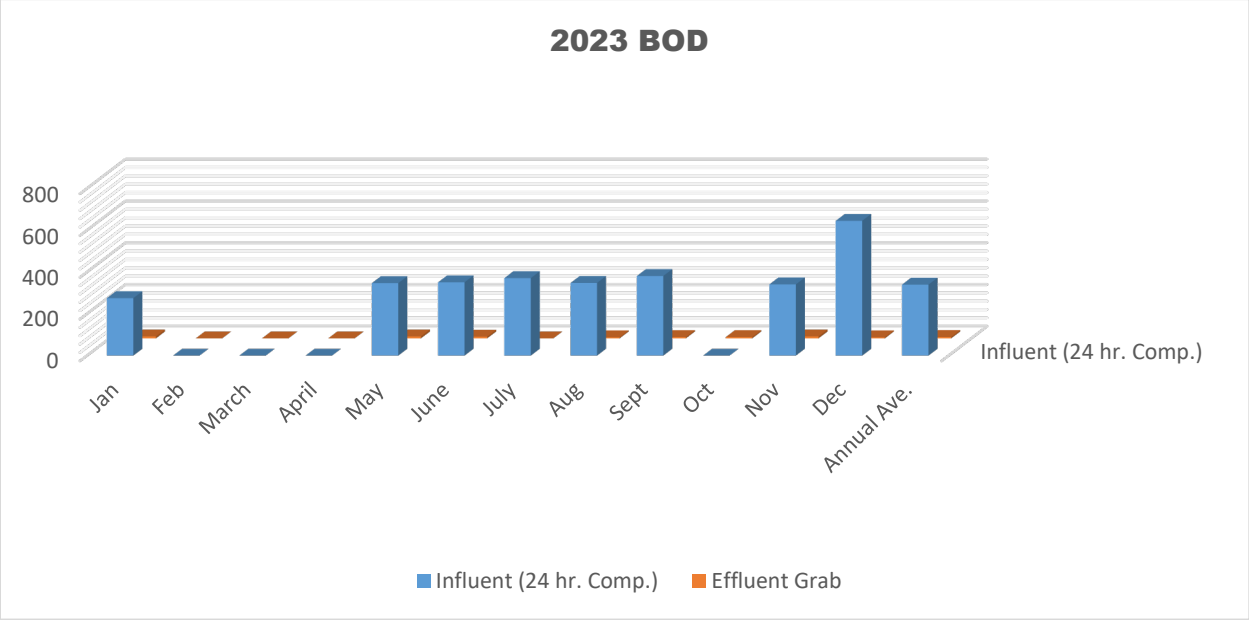
2023 I.W. BOD

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	275	9	*mg/l*	*Monthly*
Feb	*	*	*mg/l*	*Monthly*
March	*	*	*mg/l*	*Monthly*
April	*	*	*mg/l*	*Monthly*
May	347	9	*mg/l*	*Monthly*
June	351	8	*mg/l*	*Monthly*
July	371	ND	*mg/l*	*Monthly*
Aug	348	5	*mg/l*	*Monthly*
Sept	381	6	*mg/l*	*Monthly*
Oct	•	6	*mg/l*	*Monthly*
Nov	341	9	*mg/l*	*Monthly*
Dec	645	5	*mg/l*	*Monthly*
Annual Ave.	**339.89**	**6.33**	*mg/l*	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

- **Due to lab error sample for Oct. 2023 was not analyzed for Influent BOD**

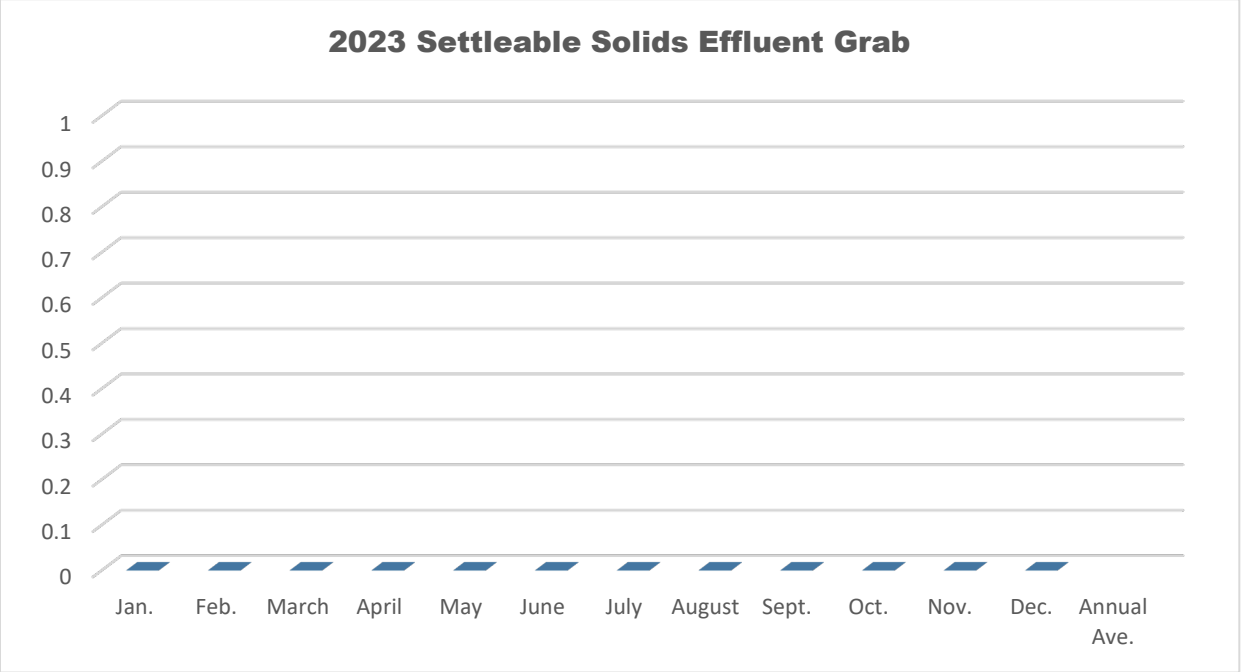


2023 I.W. Settleable Solids

Month	Effluent Grab	Unit	Frequency
Jan	ND	*mg/l*	*Monthly*
Feb	*	*mg/l*	*Monthly*
March	*	*mg/l*	*Monthly*
April	*	*mg/l*	*Monthly*
May	ND	*mg/l*	*Monthly*
June	ND	*mg/l*	*Monthly*
July	ND	*mg/l*	*Monthly*
Aug	ND	*mg/l*	*Monthly*
Sept	ND	*mg/l*	*Monthly*
Oct	ND	*mg/l*	*Monthly*
Nov	ND	*mg/l*	*Monthly*
Dec	ND	*mg/l*	*Monthly*
Annual Ave.	**ND**	*mg/l*	

Result indicates Not Detected (ND)

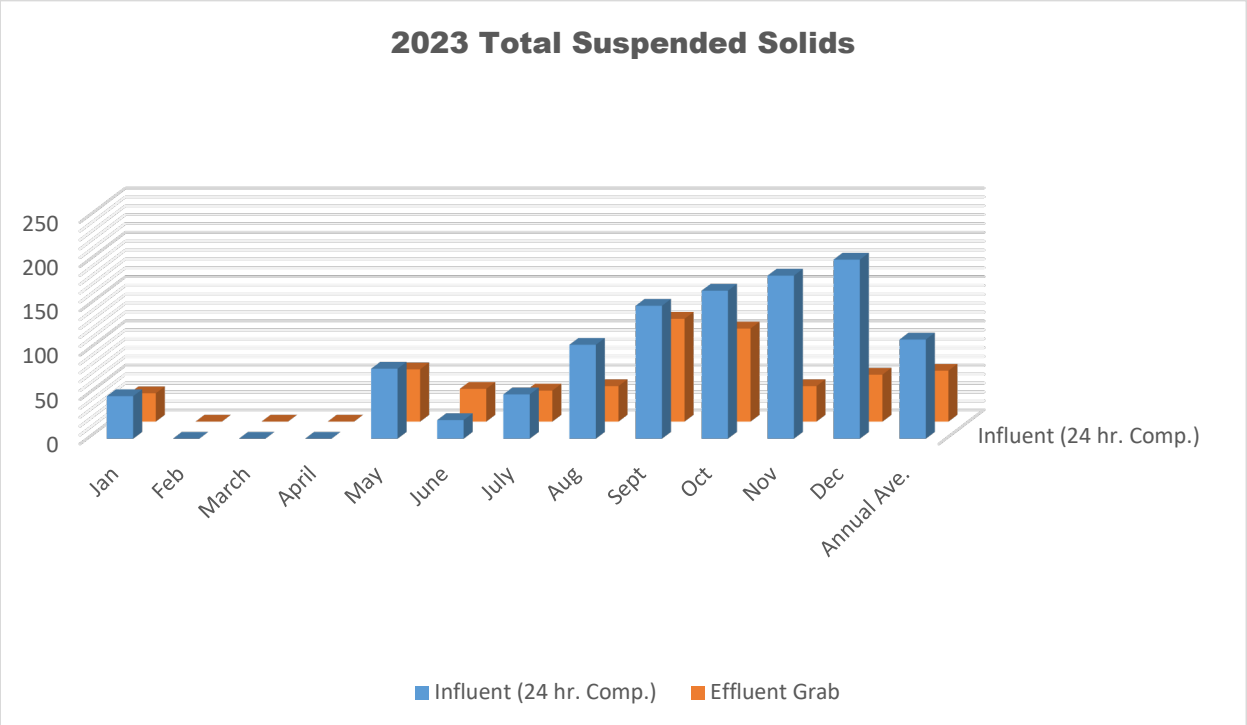
*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**



2023 I.W. Total Suspended Solids

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	48	32	mg/l	*Monthly*
Feb	*	*	mg/l	*Monthly*
March	*	*	mg/l	*Monthly*
April	*	*	mg/l	*Monthly*
May	79	59	mg/l	*Monthly*
June	21	37	mg/l	*Monthly*
July	50	35	mg/l	*Monthly*
Aug	106	40	mg/l	*Monthly*
Sept	150	116	mg/l	*Monthly*
Oct	167	105	mg/l	*Monthly*
Nov	184	40	mg/l	*Monthly*
Dec	202	53	mg/l	*Monthly*
Annual Ave.	**111.89**	**57.44**	mg/l	

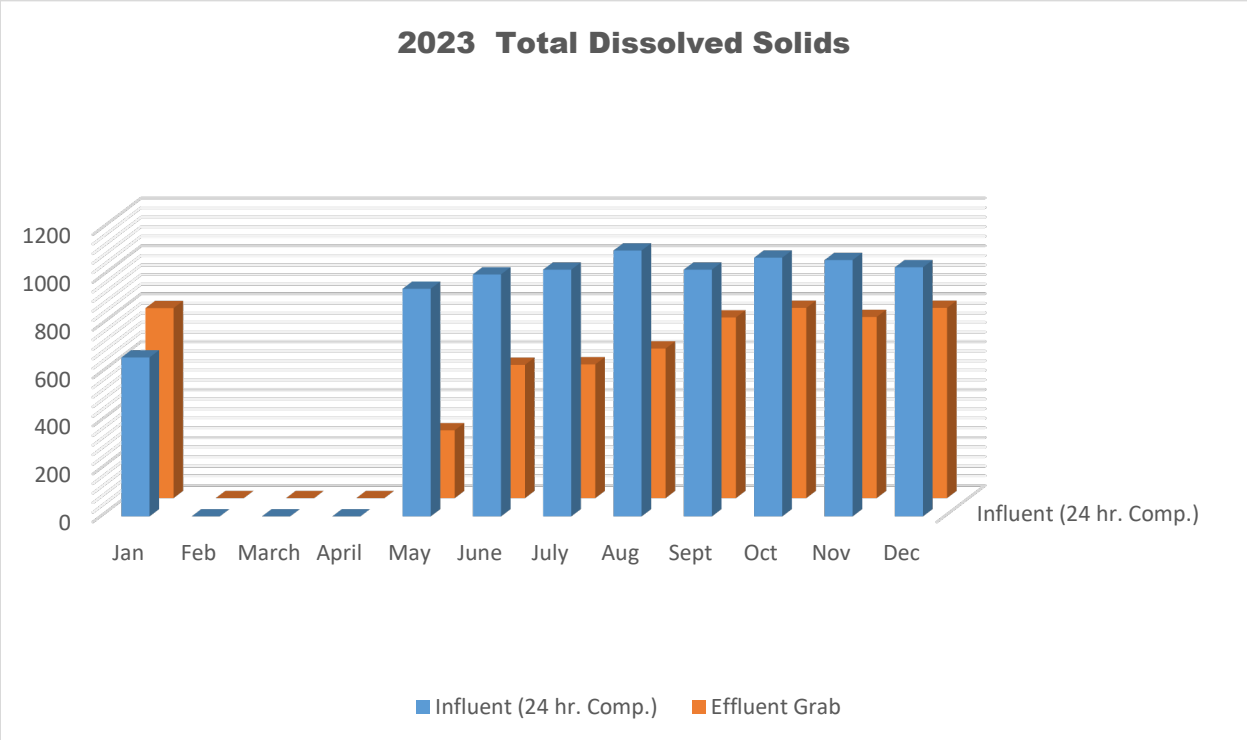
*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**



2022 I.W. Total Dissolved Solids

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	663	793	mg/l	*Monthly*
Feb	*	*	mg/l	*Monthly*
March	*	*	mg/l	*Monthly*
April	*	*	mg/l	*Monthly*
May	950	283	mg/l	*Monthly*
June	1010	556	mg/l	*Monthly*
July	1030	558	mg/l	*Monthly*
Aug	1110	624	mg/l	*Monthly*
Sept	1030	754	mg/l	*Monthly*
Oct	1080	794	mg/l	*Monthly*
Nov	1070	756	mg/l	*Monthly*
Dec	1040	794	mg/l	*Monthly*
Annual Ave.	**998.11**	**656.88**	mg/l	

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**



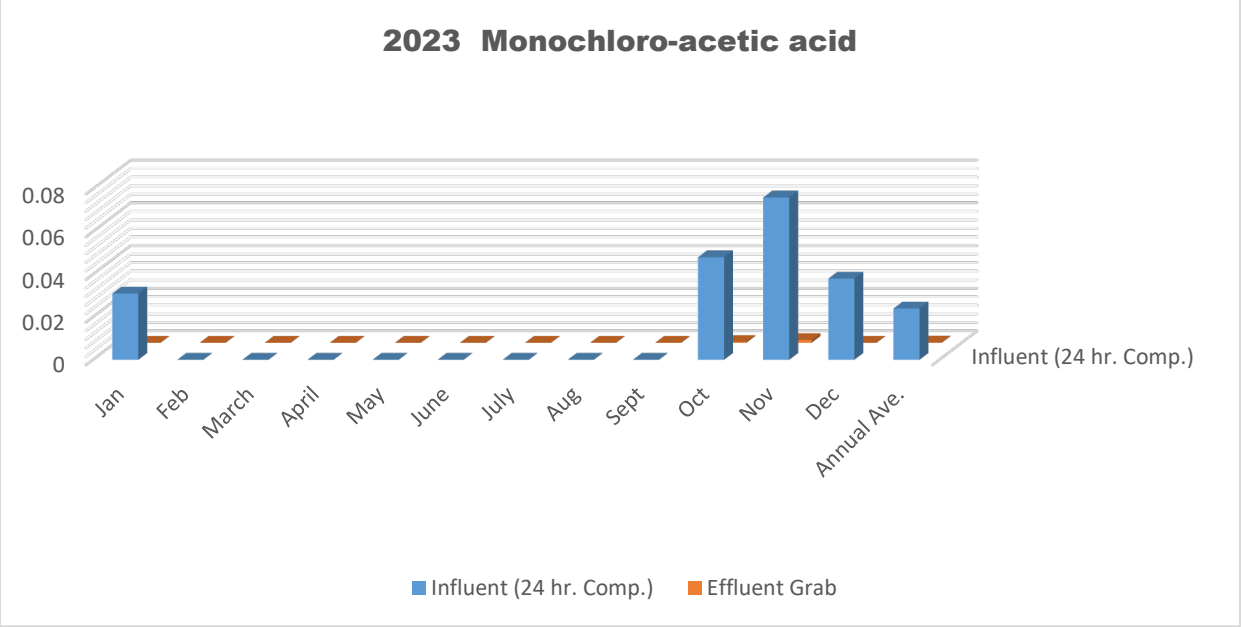
Haloacetic Acids

2023 I.W. Monochloro-acetic acid

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.031	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	ND	ND	mg/l	Monthly
June	ND	ND	mg/l	Monthly
July	ND	ND	mg/l	Monthly
Aug	ND	ND	mg/l	Monthly
Sept	ND	ND	mg/l	Monthly
Oct	0.048	0.00038	mg/l	Monthly
Nov	0.076	0.0013	mg/l	Monthly
Dec	0.038	ND	mg/l	Monthly
Annual Ave.	**0.024**	**0.0001**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

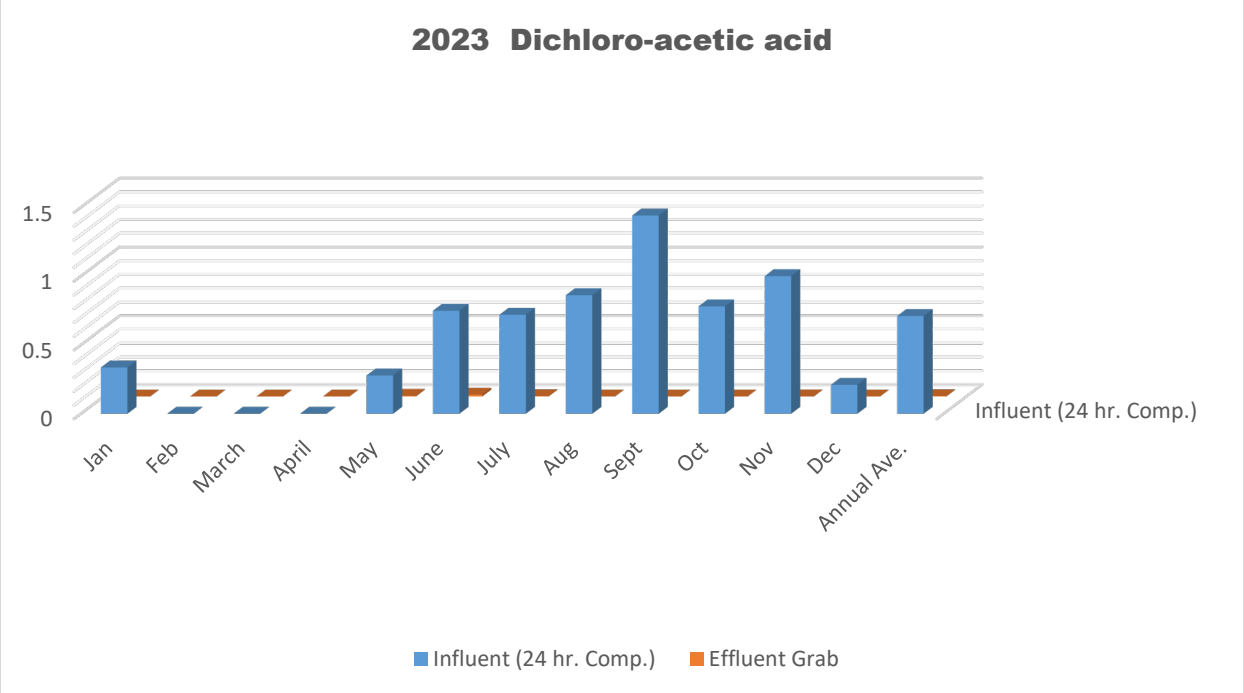


2023 I.W. Dichloro-acetic acid

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.336	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.278	0.005	mg/l	Monthly
June	0.748	0.013	mg/l	Monthly
July	0.719	0.002	mg/l	Monthly
Aug	0.861	ND	mg/l	Monthly
Sept	1.44	ND	mg/l	Monthly
Oct	0.78	ND	mg/l	Monthly
Nov	1	0.00041	mg/l	Monthly
Dec	0.210	ND	mg/l	Monthly
Annual Ave.	**0.71**	**0.002**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

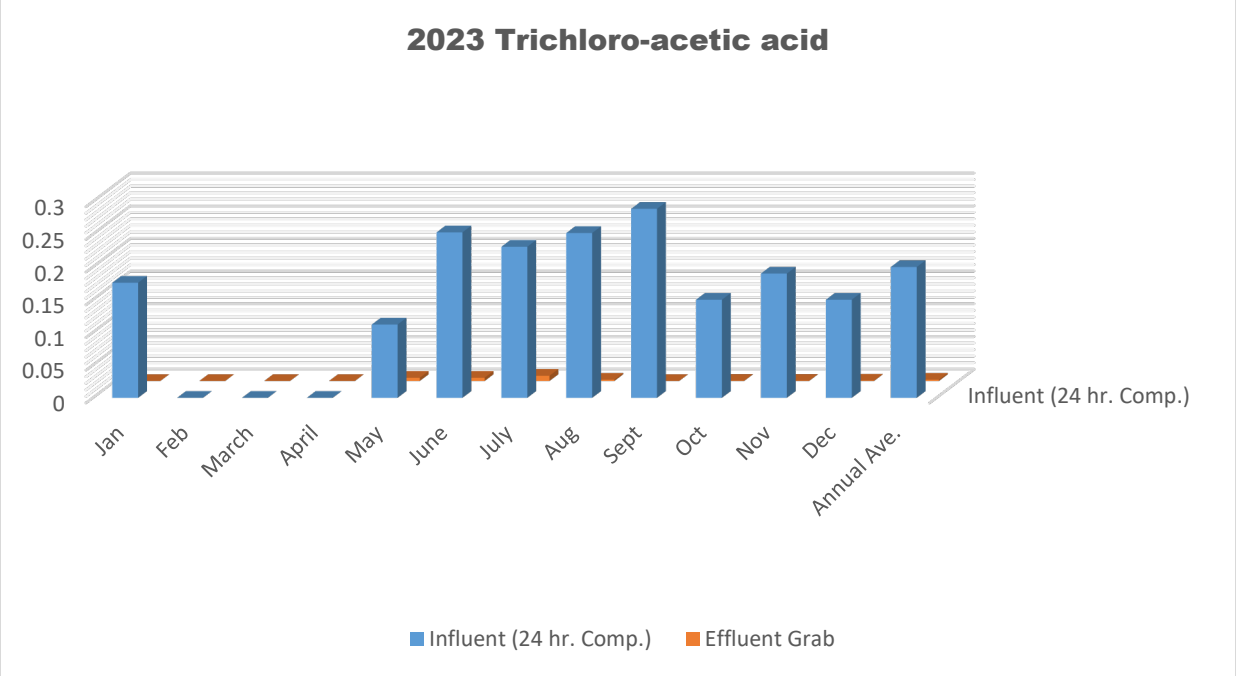


2023 I.W. Trichloro-acetic acid

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.176	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.112	0.005	mg/l	Monthly
June	0.253	0.005	mg/l	Monthly
July	0.231	0.008	mg/l	Monthly
Aug	0.252	0.002	mg/l	Monthly
Sept	0.289	ND	mg/l	Monthly
Oct	0.15	0.00034	mg/l	Monthly
Nov	0.19	0.00031	mg/l	Monthly
Dec	0.15	0.0005	mg/l	Monthly
Annual Ave.	**0.2**	**0.002**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

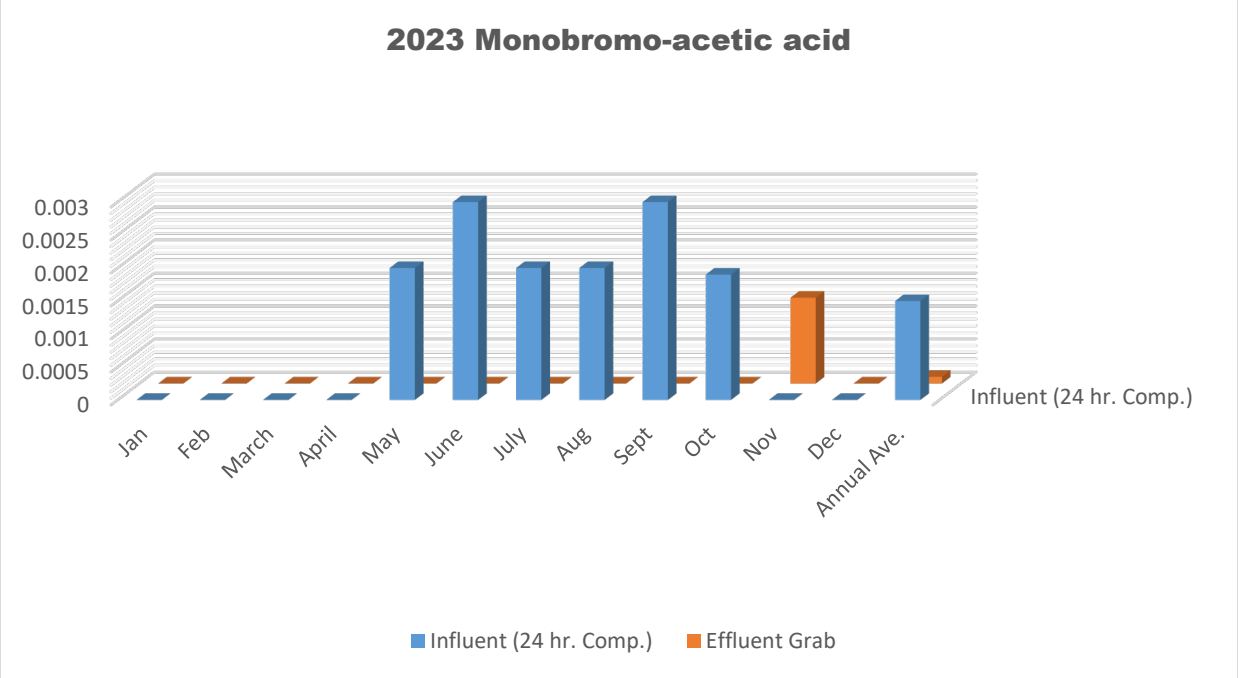


2023 I.W. Monobromo-acetic acid

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	ND	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.002	ND	mg/l	Monthly
June	0.003	ND	mg/l	Monthly
July	0.002	ND	mg/l	Monthly
Aug	0.002	ND	mg/l	Monthly
Sept	0.003	ND	mg/l	Monthly
Oct	0.0019	ND	mg/l	Monthly
Nov	ND	0.0013	mg/l	Monthly
Dec	ND	ND	mg/l	Monthly
Annual Ave.	**0.0015**	**0.0001**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

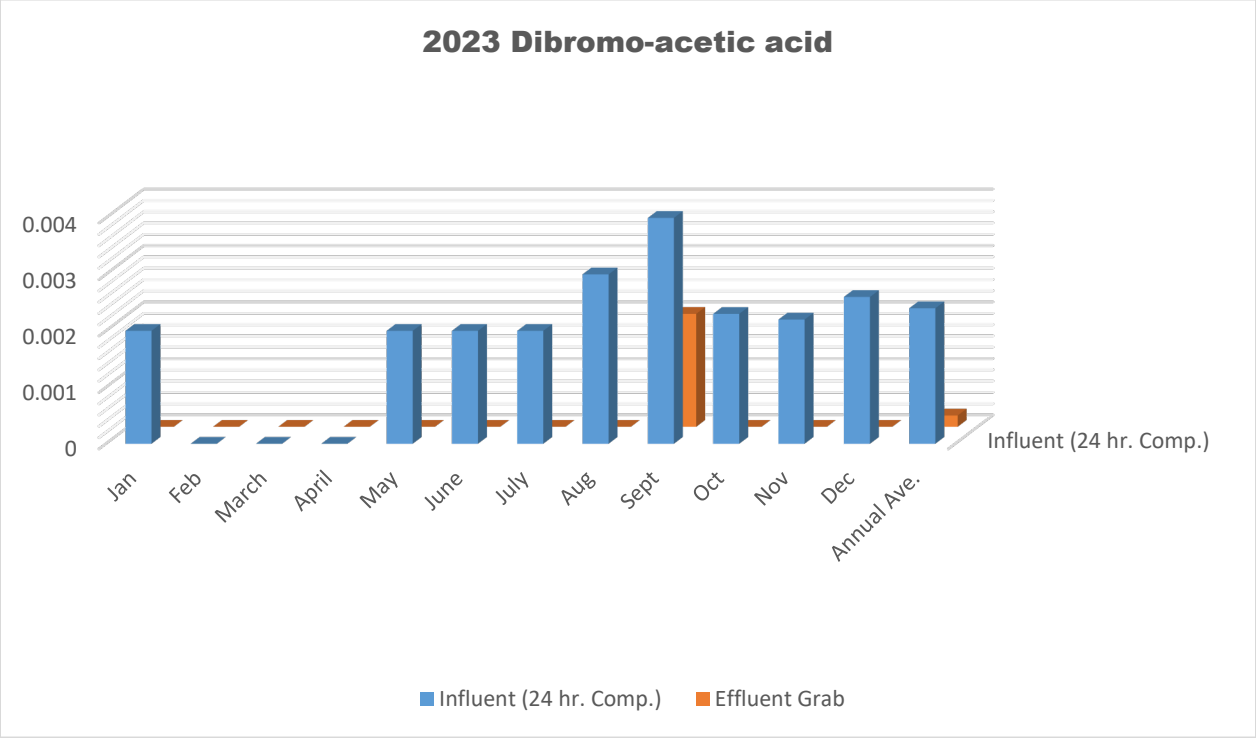


2023 Dibromo-acetic acid

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.002	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.002	ND	mg/l	Monthly
June	0.002	ND	mg/l	Monthly
July	0.002	ND	mg/l	Monthly
Aug	0.003	ND	mg/l	Monthly
Sept	0.004	0.002	mg/l	Monthly
Oct	0.0023	ND	mg/l	Monthly
Nov	0.0022	ND	mg/l	Monthly
Dec	0.0026	ND	mg/l	Monthly
Annual Ave.	**0.0024**	**0.0002**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

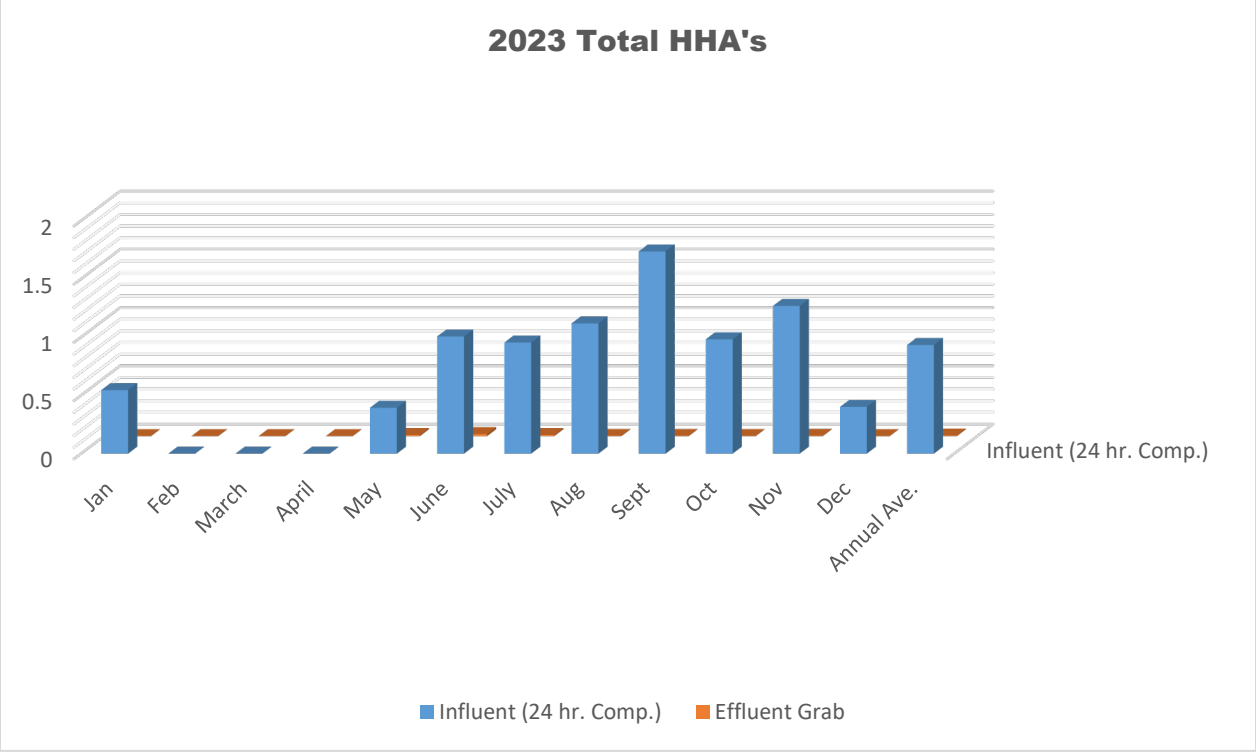


2023 I.W. Total HAA's

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.545	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.394	0.01	mg/l	Monthly
June	1.006	0.018	mg/l	Monthly
July	0.954	0.01	mg/l	Monthly
Aug	1.118	0.002	mg/l	Monthly
Sept	1.736	0.002	mg/l	Monthly
Oct	0.982	0.00072	mg/l	Monthly
Nov	1.268	0.0033	mg/l	Monthly
Dec	0.401	0.0005	mg/l	Monthly
Annual Ave.	**0.933**	**0.005**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**



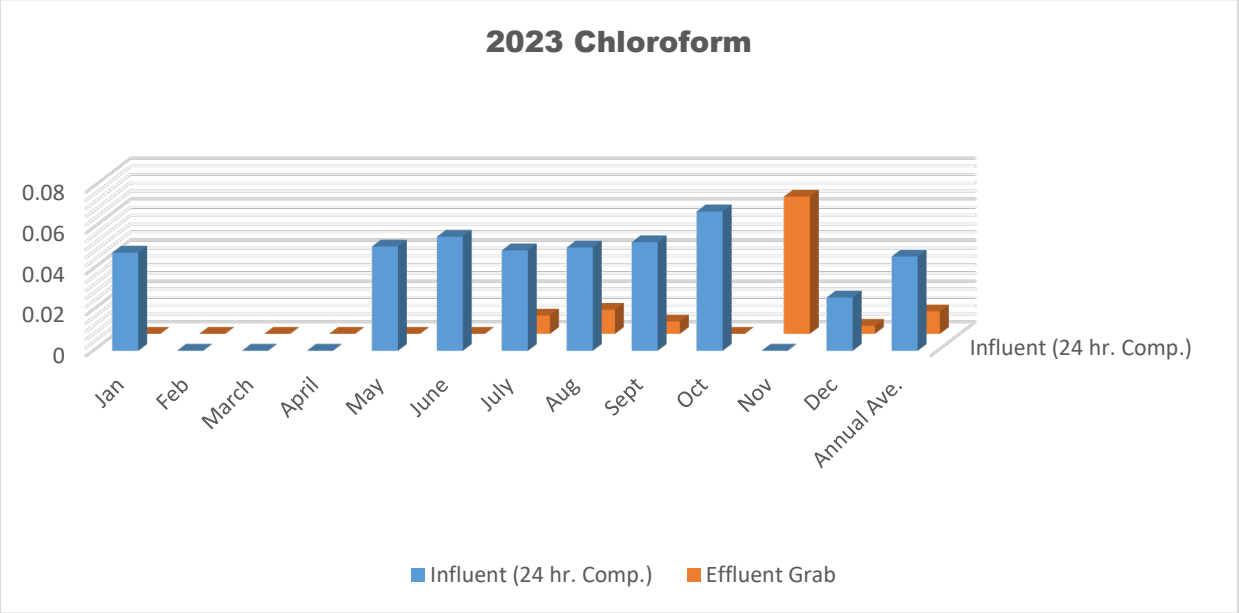
Trihalomethanes Acids

2023 I.W. Chloroform

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.0479	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.0509	ND	mg/l	Monthly
June	0.0557	ND	mg/l	Monthly
July	0.049	0.0089	mg/l	Monthly
Aug	0.0504	0.0117	mg/l	Monthly
Sept	0.053	0.006	mg/l	Monthly
Oct	0.068	ND	mg/l	Monthly
Nov	ND	0.067	mg/l	Monthly
Dec	0.026	0.0039	mg/l	Monthly
Annual Ave.	**0.046**	**0.01**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

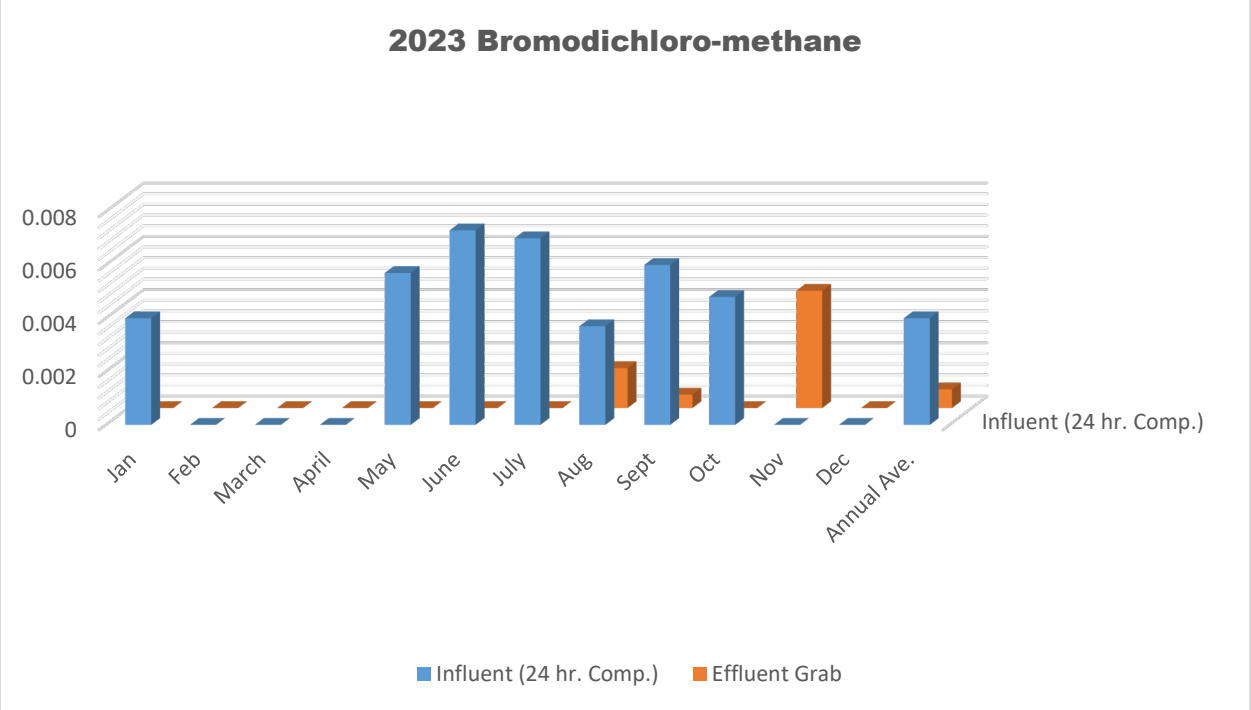


2023 I.W. Bromodichloro-methane

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.004	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.0057	ND	mg/l	Monthly
June	0.0073	ND	mg/l	Monthly
July	0.007	ND	mg/l	Monthly
Aug	0.0037	0.0015	mg/l	Monthly
Sept	0.006	0.0005	mg/l	Monthly
Oct	0.0048	ND	mg/l	Monthly
Nov	ND	0.0044	mg/l	Monthly
Dec	ND	ND	mg/l	Monthly
Annual Ave.	**0.004**	**0.0007**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

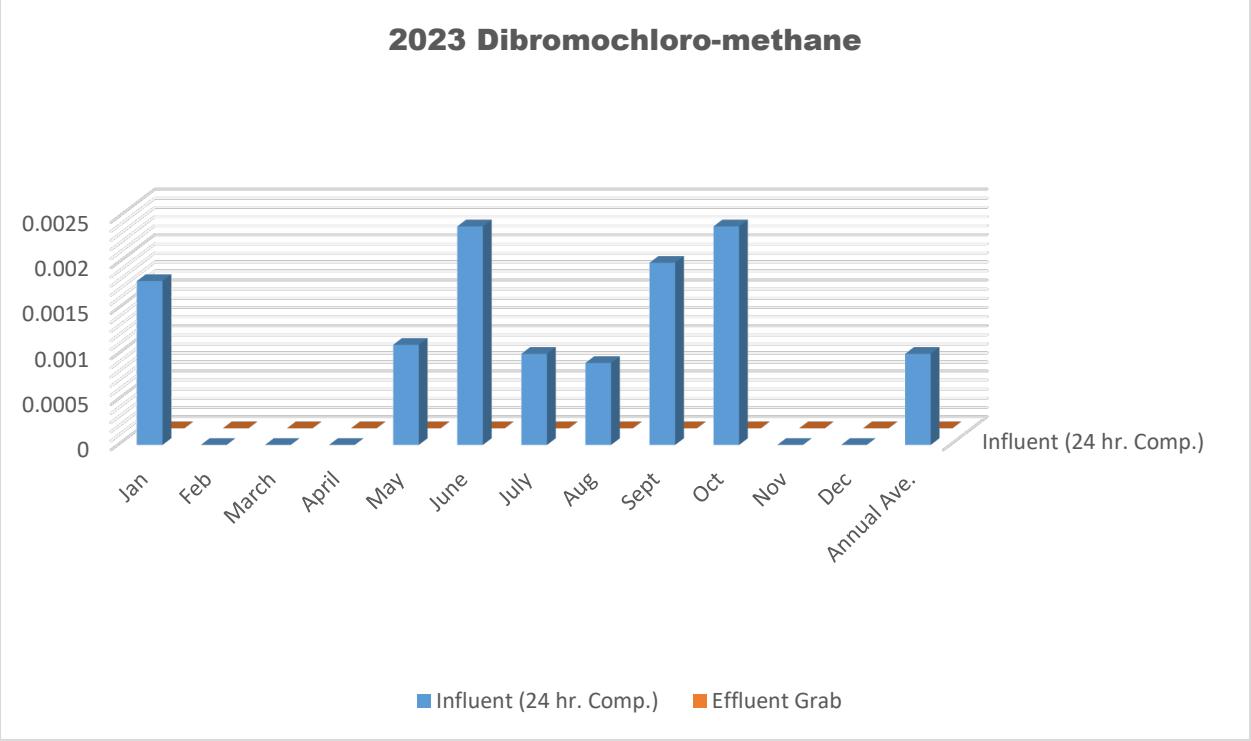


2023 I.W. Dibromochloro-methane

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.0018	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.0011	ND	mg/l	Monthly
June	0.0024	ND	mg/l	Monthly
July	0.001	ND	mg/l	Monthly
Aug	0.0009	ND	mg/l	Monthly
Sept	0.002	ND	mg/l	Monthly
Oct	0.0024	ND	mg/l	Monthly
Nov	ND	ND	mg/l	Monthly
Dec	ND	ND	mg/l	Monthly
Annual Ave.	**0.001**	**ND**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**



2023 I.W. Bromoform

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.0017	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	ND	ND	mg/l	Monthly
June	0.0007	ND	mg/l	Monthly
July	ND	ND	mg/l	Monthly
Aug	ND	ND	mg/l	Monthly
Sept	0.002	ND	mg/l	Monthly
Oct	ND	ND	mg/l	Monthly
Nov	ND	ND	mg/l	Monthly
Dec	ND	ND	mg/l	Monthly
Annual Ave.	**0.0004**	**ND**	mg/l	

Result indicates Not Detected (ND)

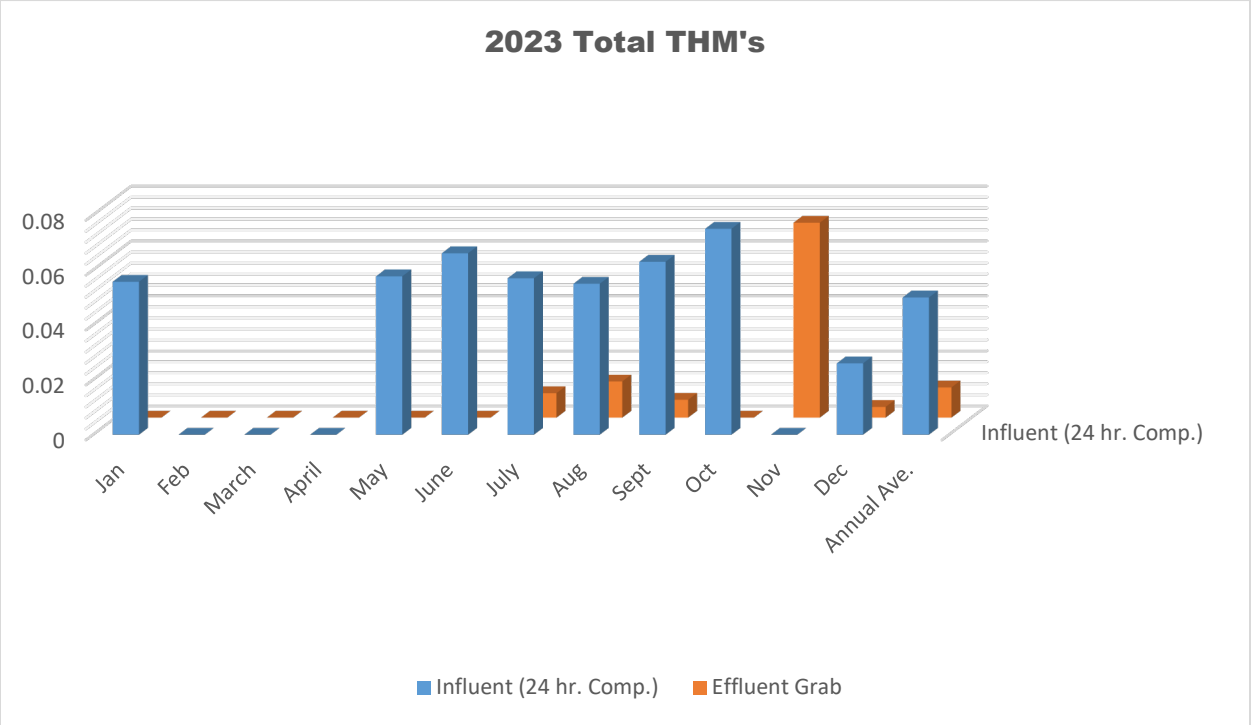
*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

2023 I.W. Total THM's

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	0.0557	ND	mg/l	Monthly
Feb	*	*	mg/l	Monthly
March	*	*	mg/l	Monthly
April	*	*	mg/l	Monthly
May	0.0577	ND	mg/l	Monthly
June	0.0661	ND	mg/l	Monthly
July	0.057	0.0089	mg/l	Monthly
Aug	0.055	0.0132	mg/l	Monthly
Sept	0.063	0.0065	mg/l	Monthly
Oct	0.075	ND	mg/l	Monthly
Nov	ND	0.071	mg/l	Monthly
Dec	0.026	0.0039	mg/l	Monthly
Annual Ave.	**0.05**	**0.01**	mg/l	

Result indicates Not Detected (ND)

*** No sampling due to flooding event Feb.-April (Annual Average based on sampled months)**

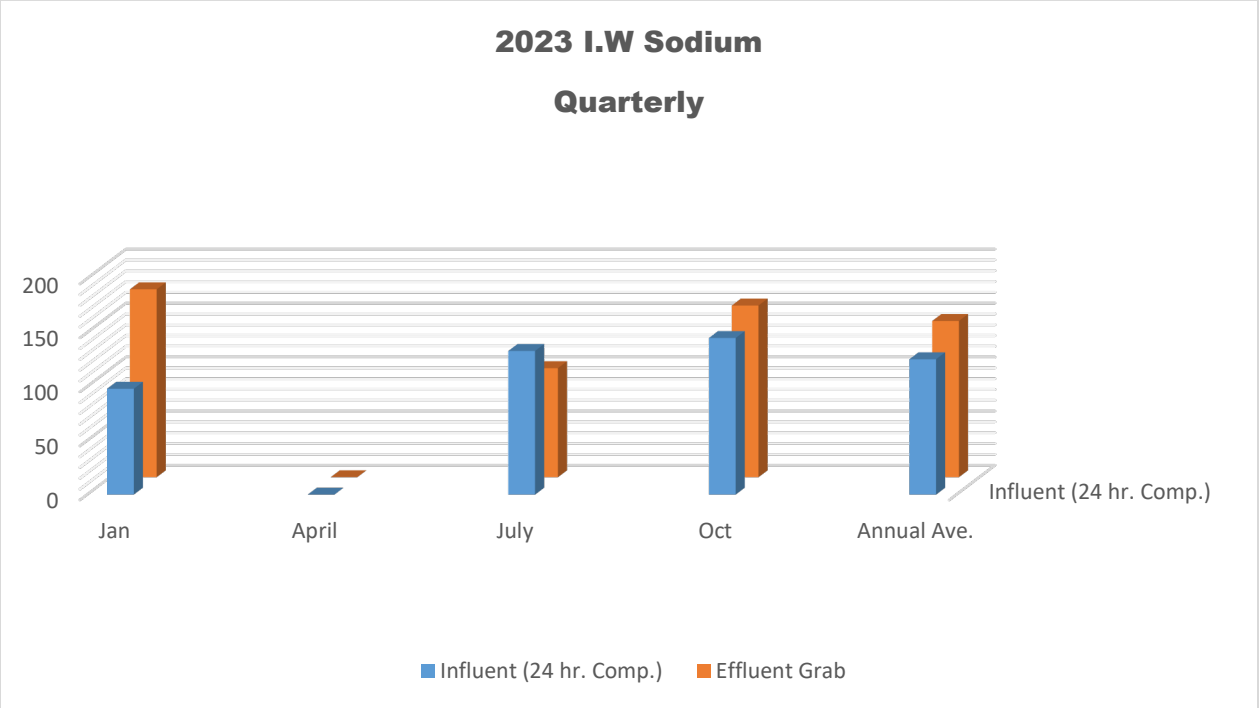


2023 Influent & Effluent Quarterly Sampling

2023 I.W. Sodium

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
January	98	174	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	133	101	mg/l	*Quarterly*
October	145	159	mg/l	*Quarterly*
Annual Ave.	**125.33**	**144.67**	mg/l	

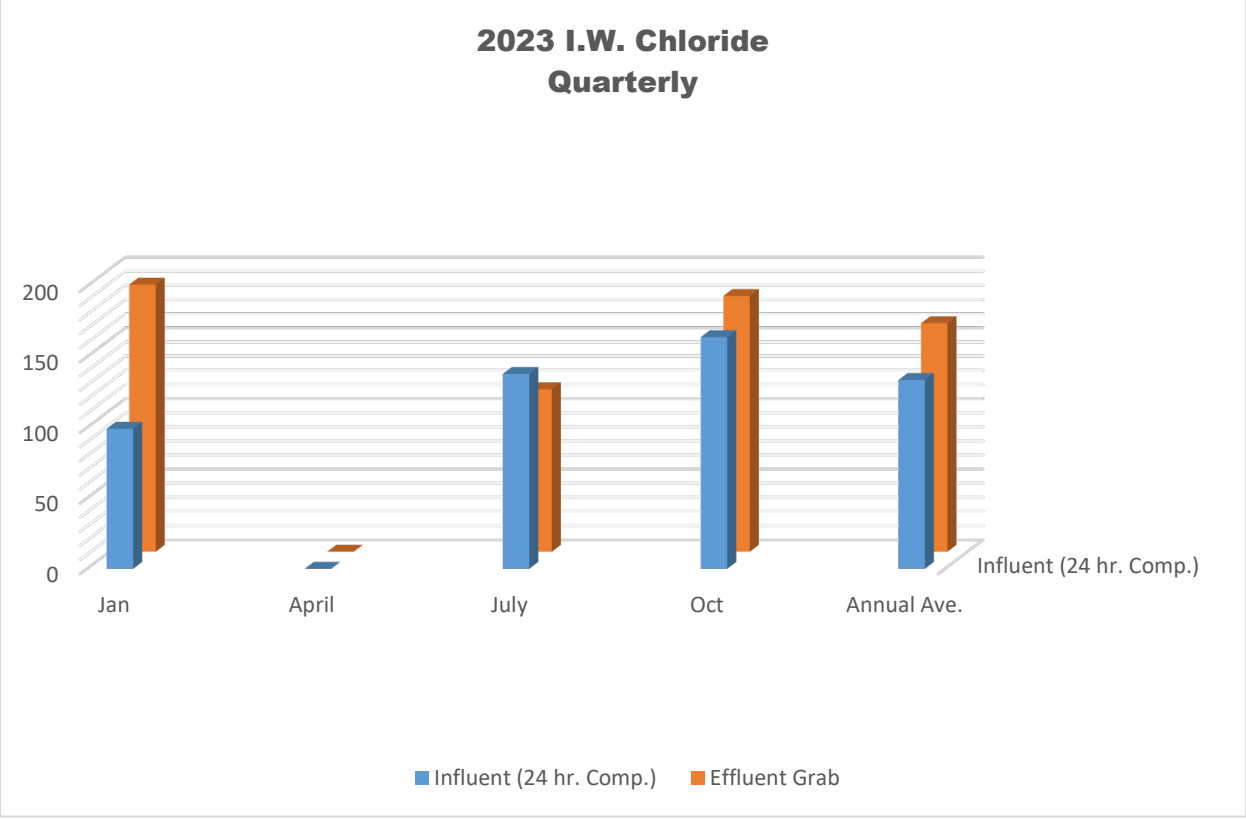
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 I.W. Chloride

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
January	99.2	189	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	138	115	mg/l	*Quarterly*
October	164	181	mg/l	*Quarterly*
Annual Ave.	**133.73**	**161.67**	mg/l	

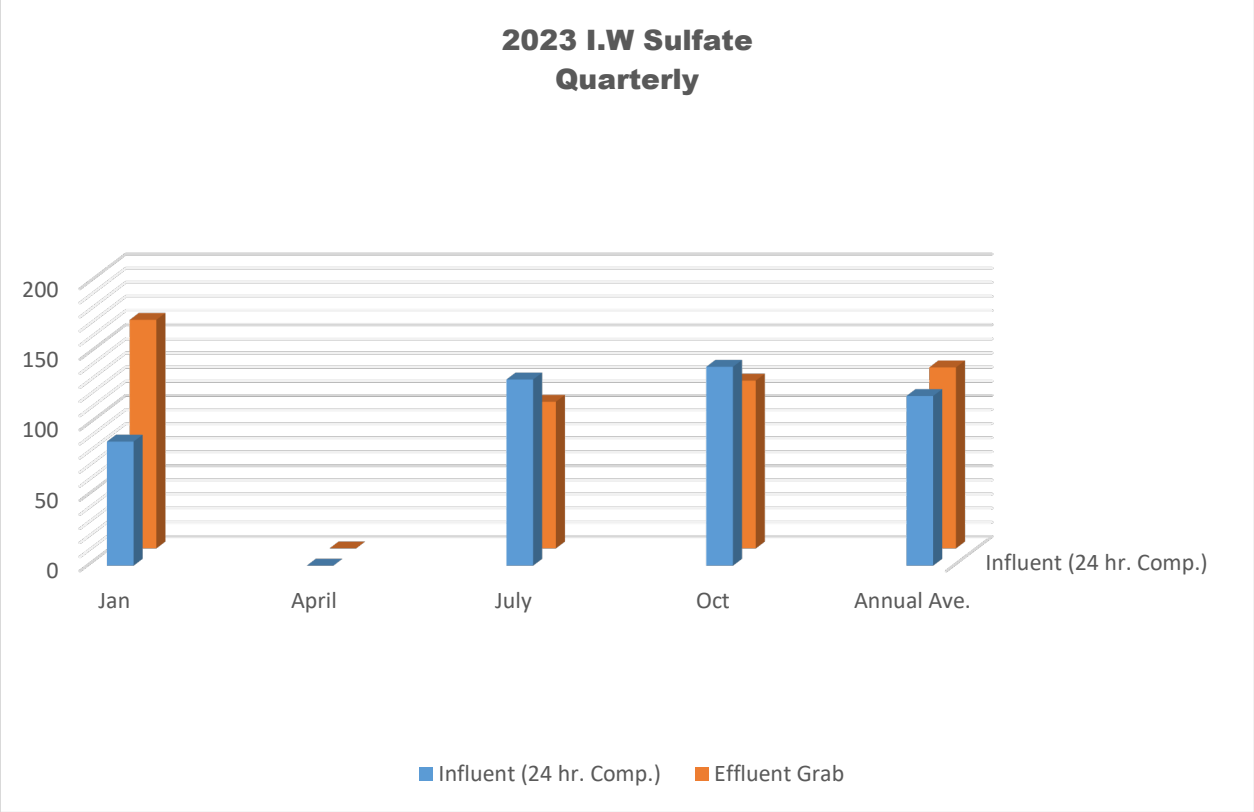
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 I.W. Sulfate

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
January	88	162	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	132	104	mg/l	*Quarterly*
October	141	119	mg/l	*Quarterly*
Annual Ave.	**120.33**	**128.33**	mg/l	

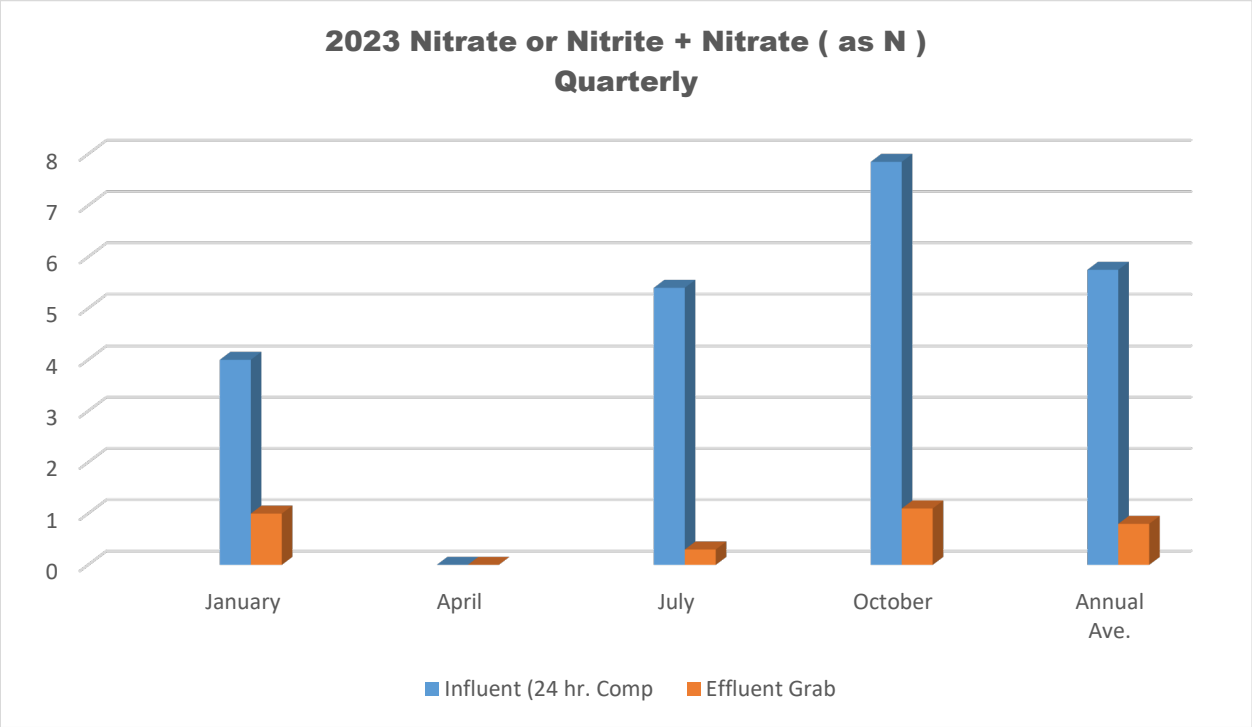
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 I.W. Nitrate or Nitrite + Nitrate (as N)

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
January	4	1	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	5.4	0.3	mg/l	*Quarterly*
October	7.85	1.1	mg/l	*Quarterly*
Annual Ave.	**5.75**	**0.8**	mg/l	

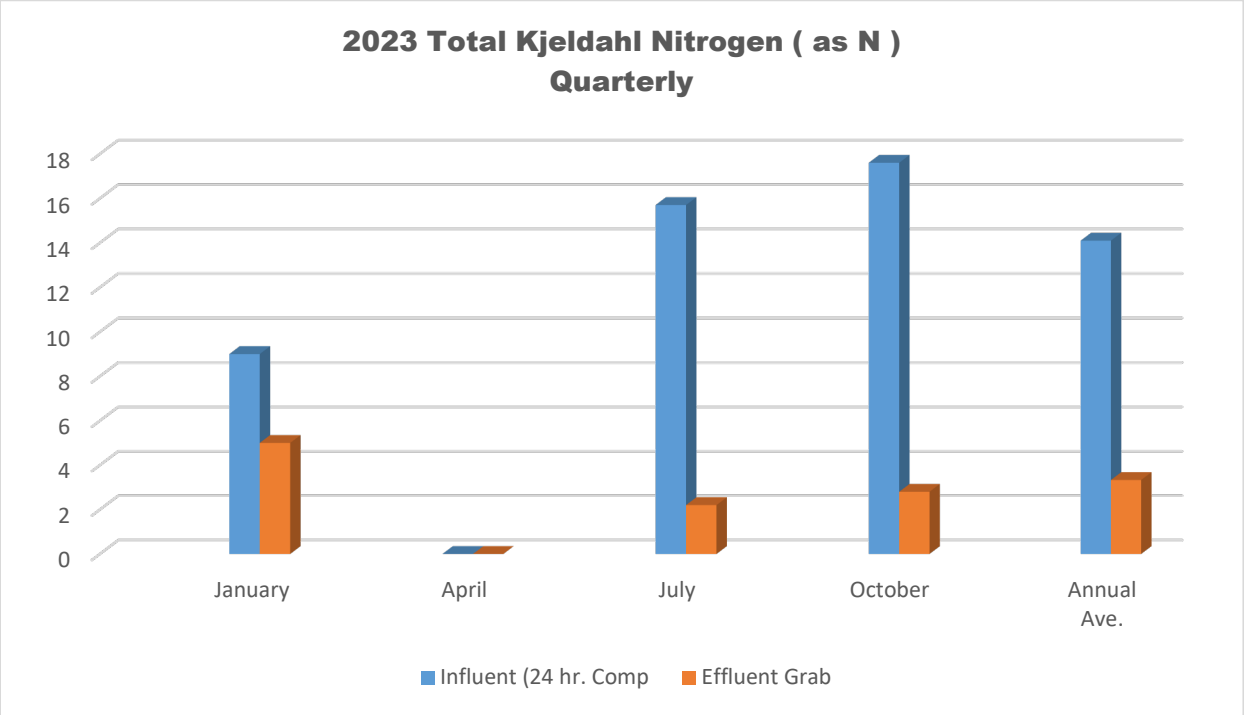
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 I.W. Total Kjeldahl Nitrogen (as N)

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	9	3	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	15.7	2.2	mg/l	*Quarterly*
Oct	17.6	2.8	mg/l	*Quarterly*
Annual Ave.	**8.77**	**2.67**	mg/l	

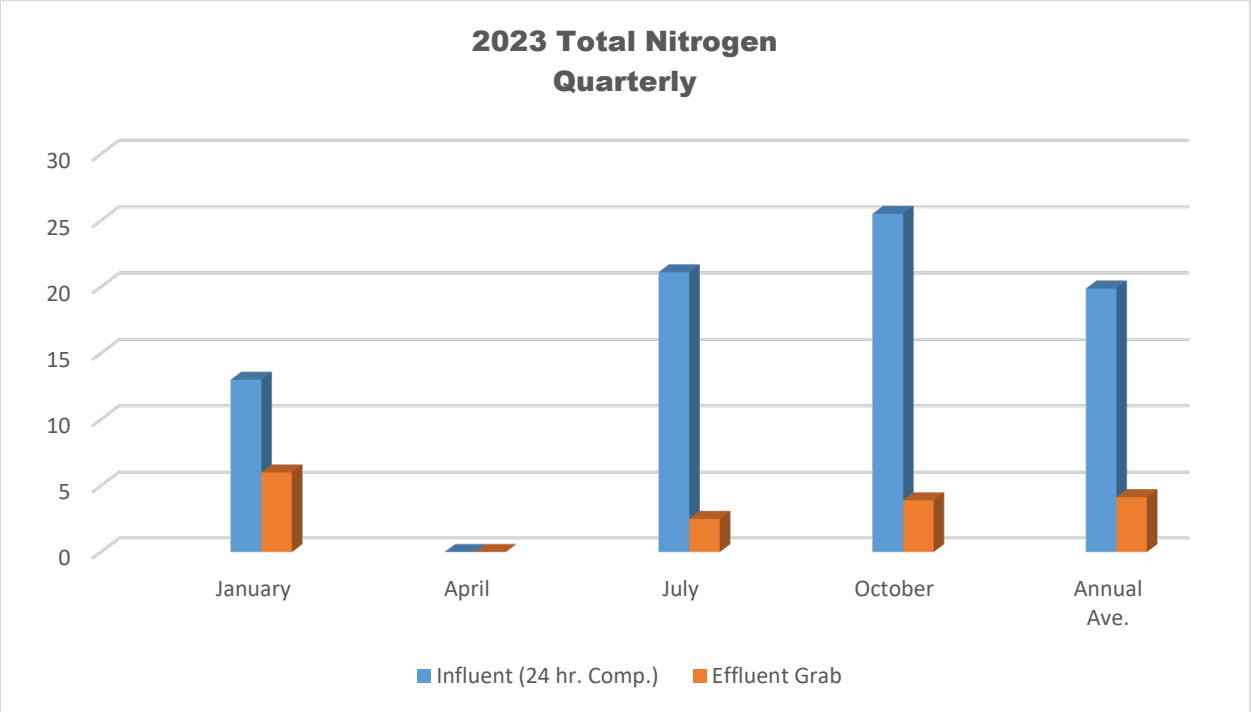
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 I.W. Total Nitrogen (as N)

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	13	6	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	21.1	2.5	mg/l	*Quarterly*
Oct	25.5	3.9	mg/l	*Quarterly*
Annual Ave.	**19.87**	**4.13**	mg/l	

*** No sampling In April due to March flooding event (Annual Average based on sampled months)**

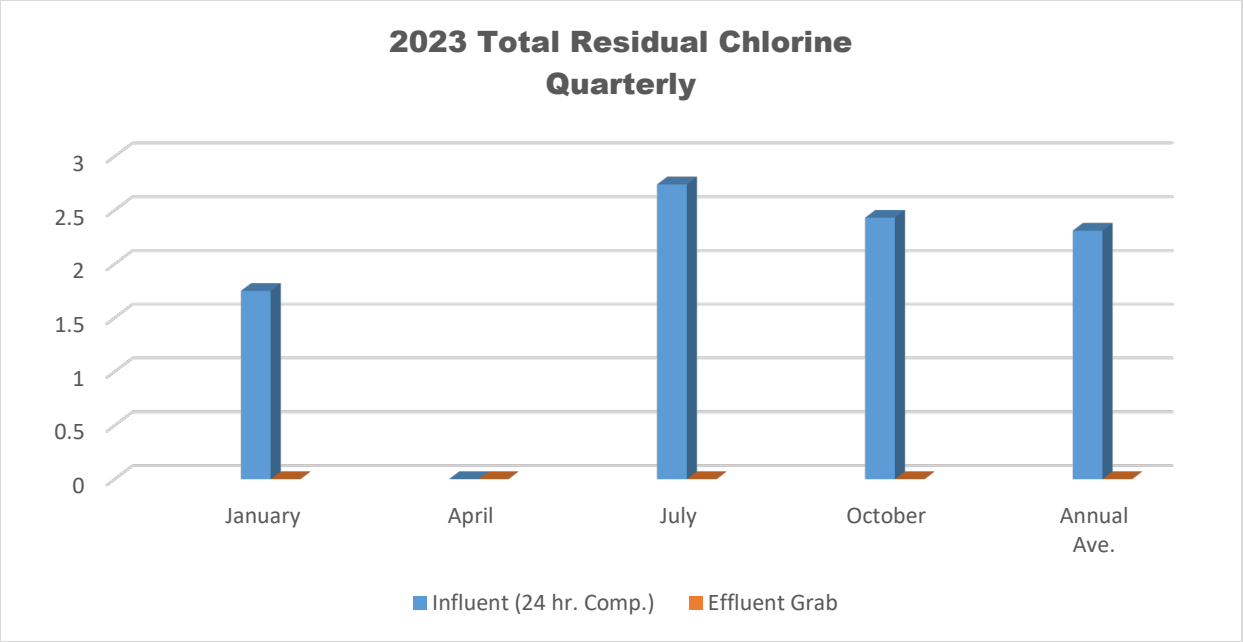


2023 I.W. Total Residual Chlorine

Month	Influent (24 hr. Comp.)	Effluent Grab	Unit	Frequency
Jan	1.75	ND	mg/l	*Quarterly*
April	*	*	mg/l	*Quarterly*
July	2.74	ND	mg/l	*Quarterly*
Oct	2.43	ND	mg/l	*Quarterly*
Annual Ave.	**2.31**	**ND**	mg/l	

Result indicates Not Detected (ND)

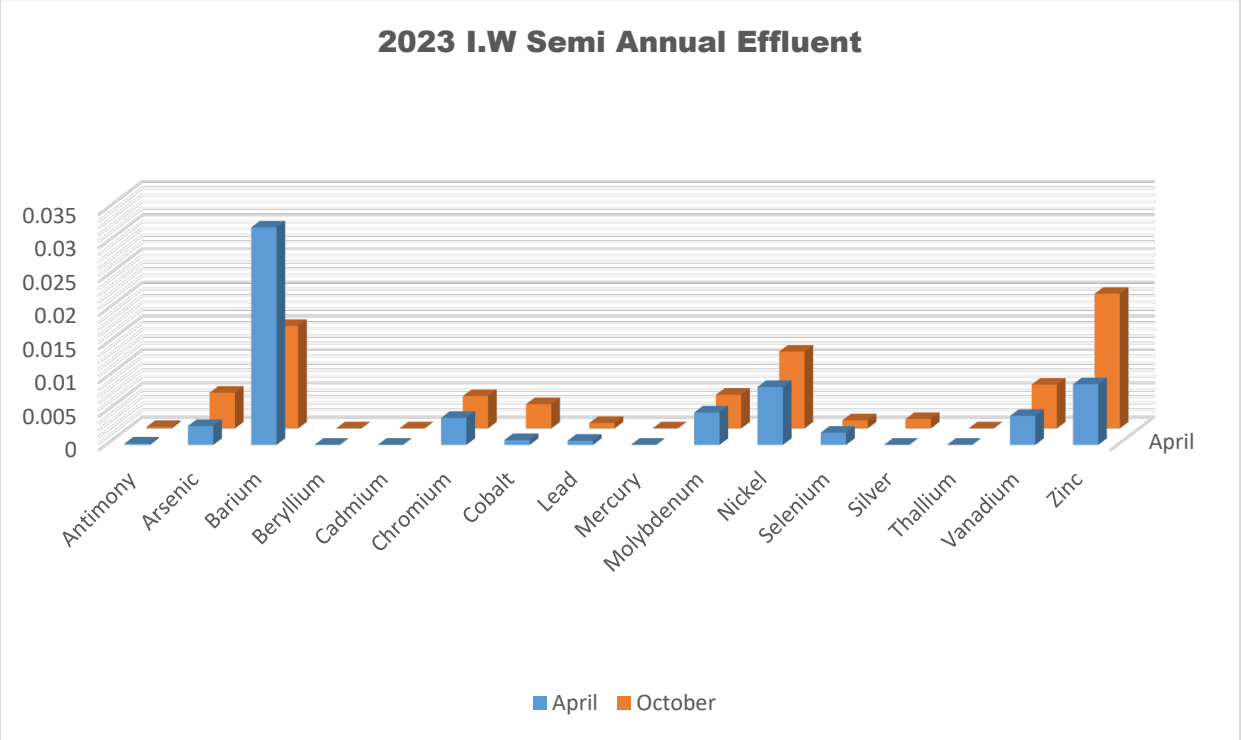
*** No sampling In April due to March flooding event (Annual Average based on sampled months)**



2023 Semi Annual Effluent Monitoring

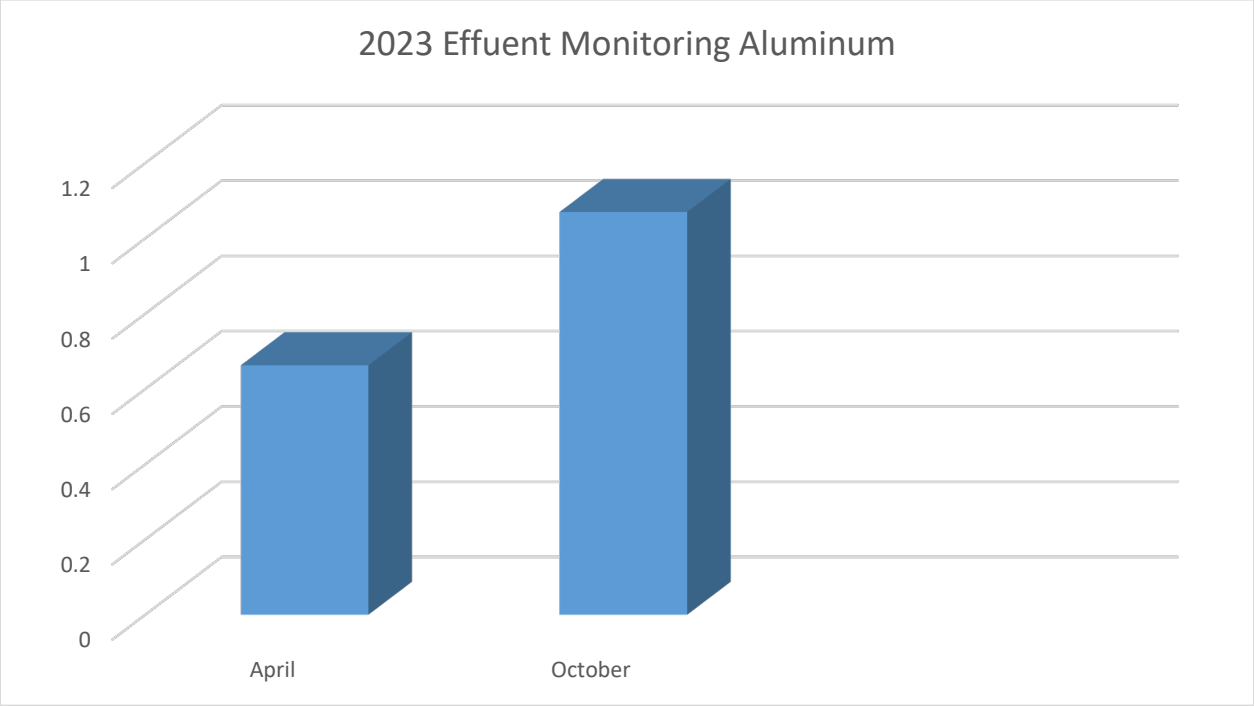
Analyte	April	October	Unit
Antimony	0.0002	0.0002	mg/l
Arsenic	0.0028	0.0053	mg/l
Barium	0.0323	0.0152	mg/l
Beryllium	ND	ND	mg/l
Cadmium	ND	ND	mg/l
Chromium	0.004	0.0008	mg/l
Cobalt	0.0007	0.0036	mg/l
Lead	0.0006	0.0008	mg/l
Mercury	ND	ND	mg/l
Molybdenum	0.0048	0.005	mg/l
Nickel	0.0086	0.0114	mg/l
Selenium	0.0018	0.0012	mg/l
Silver	ND	0.0014	mg/l
Thallium	ND	ND	mg/l
Vanadium	0.0043	0.0065	mg/l
Zinc	0.009	0.02	mg/l

Result indicates Not Detected (ND)



2023 Semi Annual Effluent Monitoring Aluminum

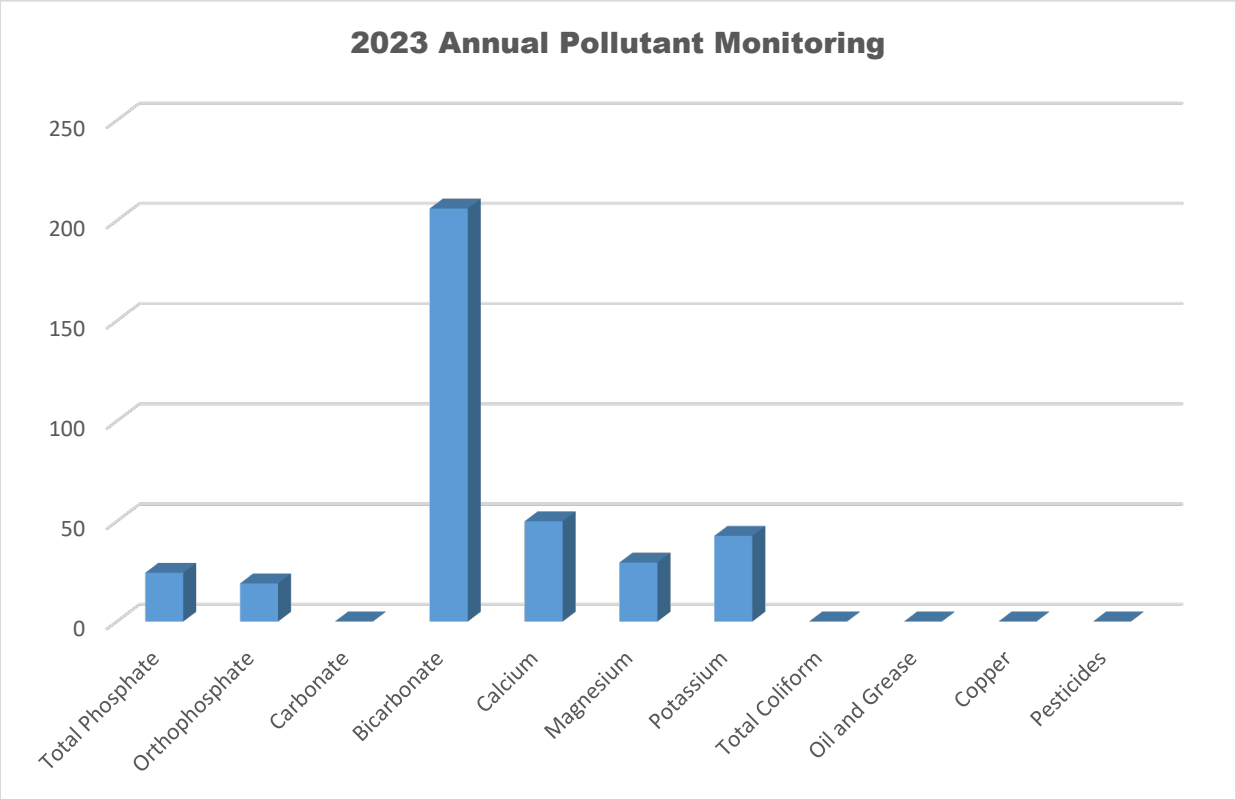
Analyte	April	October	Unit
Aluminum	0.663	1.070	mg/l



2023 I.W. Pollutant Monitoring October Annual

Analyte	Effluent Grab	Unit	Frequency
Total Phosphate	24.3	*mg/l*	*Annual*
Orthophosphate	19	*mg/l*	*Annual*
Carbonate	ND	*mg/l*	*Annual*
Bicarbonate	206	*mg/l*	*Annual*
Calcium	50	*mg/l*	*Annual*
Magnesium	29.4	*mg/l*	*Annual*
Potassium	42.7	*mg/l*	*Annual*
Total Coliform	>24200	*mg/l*	*Annual*
Oil and Grease	ND	*mg/l*	*Annual*
Copper	ND	*mg/l*	*Annual*
Pesticides	ND	*mg/l*	*Annual*

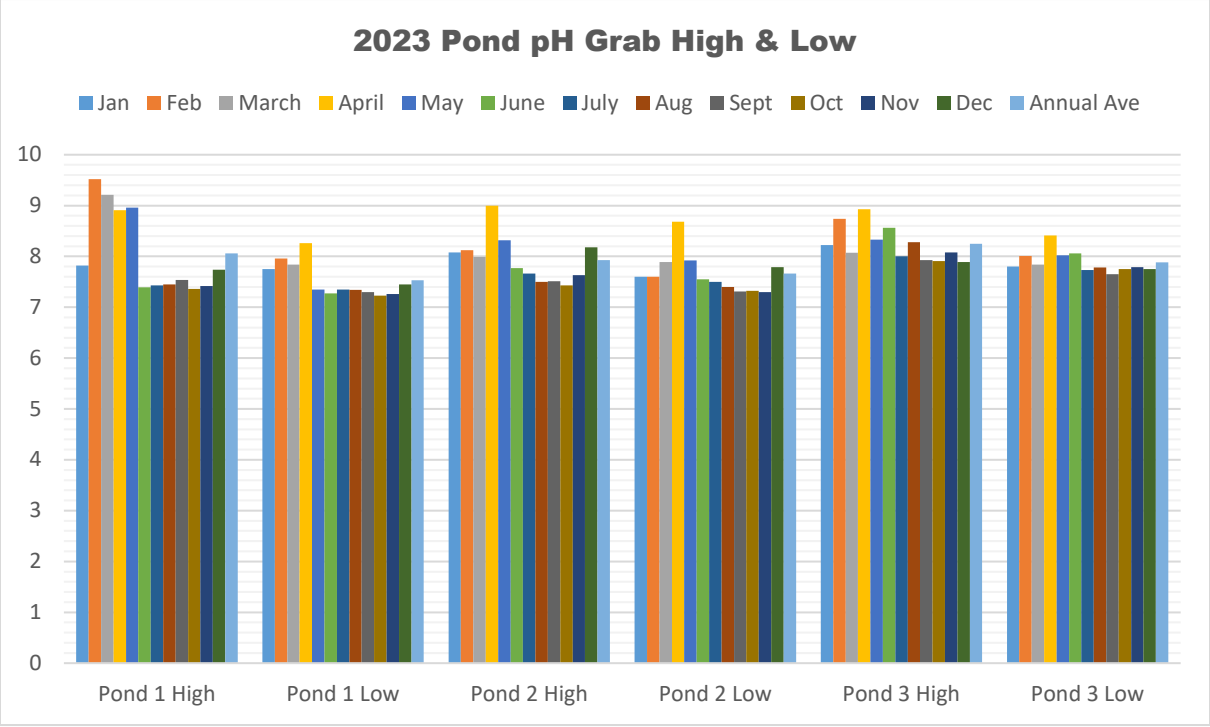
Result indicates Not Detected (ND)



POND MONITORING

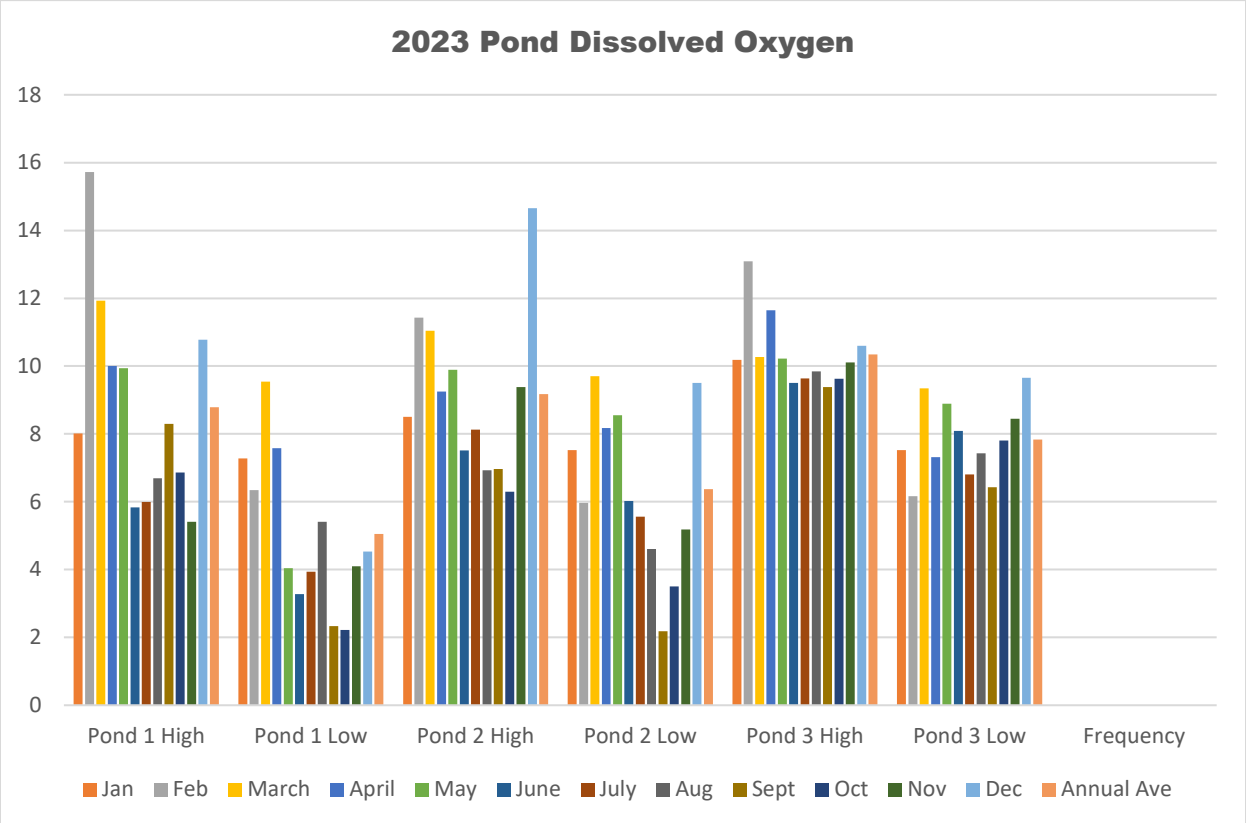
2023 pH (Grab)

Month	Pond 1 High	Pond 1 Low	Pond 2 High	Pond 2 Low	Pond 3 High	Pond 3 Low
Jan	7.82	7.75	8.08	7.6	8.22	7.8
Feb	9.52	7.96	8.12	7.6	8.74	8.01
March	9.21	7.84	7.99	7.89	8.07	7.84
April	8.91	8.26	9.00	8.68	8.93	8.41
May	8.96	7.35	8.32	7.92	8.33	8.02
June	7.39	7.27	7.77	7.55	8.56	8.06
July	7.43	7.35	7.66	7.50	8.00	7.73
Aug	7.45	7.34	7.50	7.4	8.28	7.78
Sept	7.54	7.3	7.51	7.31	7.93	7.65
Oct	7.36	7.23	7.43	7.32	7.91	7.75
Nov	7.42	7.26	7.63	7.3	8.08	7.79
Dec	7.74	7.45	8.18	7.79	7.89	7.75
Annual Ave	8.06	7.53	7.93	7.66	8.25	7.88
Sample Freq.	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly



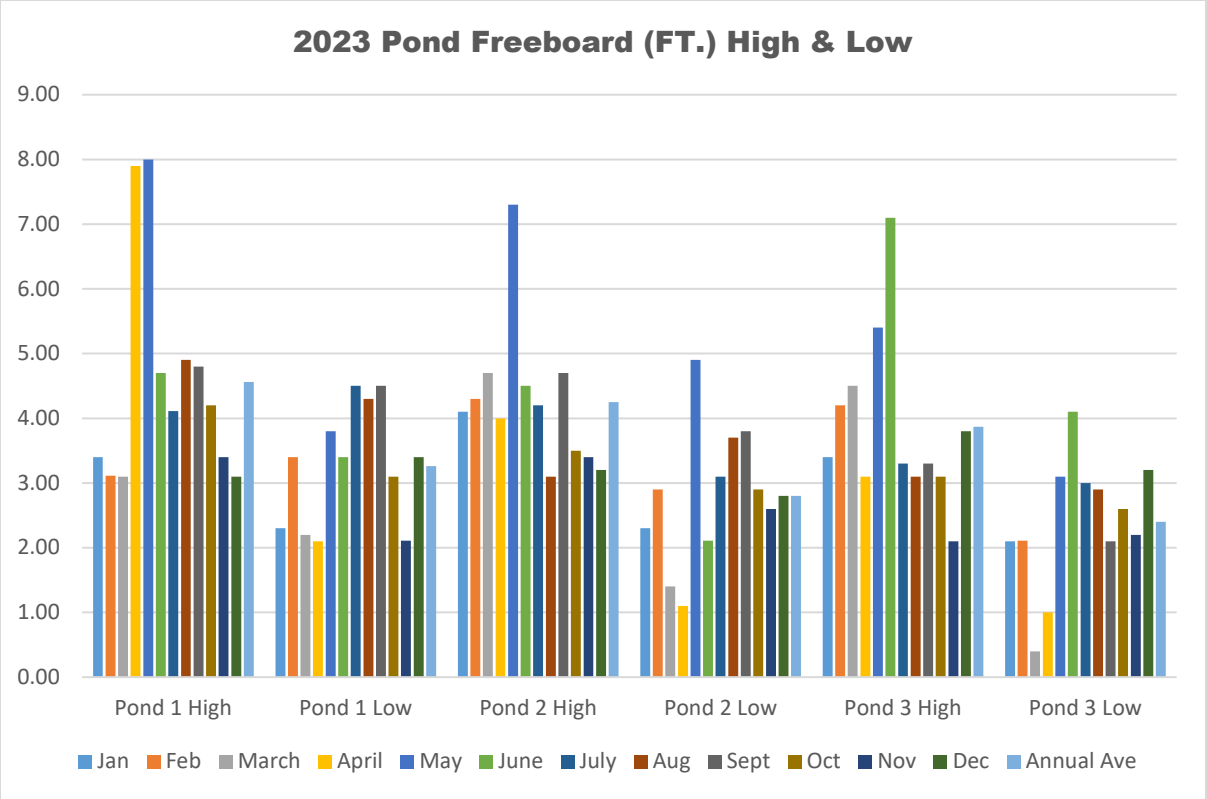
2023 Dissolved Oxygen

Month	Pond 1 High	Pond 1 Low	Pond 2 High	Pond 2 Low	Pond 3 High	Pond 3 Low	Frequency
Jan	8.01	7.28	8.5	7.52	10.18	7.52	Weekly
Feb	15.72	6.34	11.43	5.97	13.09	6.16	Weekly
March	11.93	9.54	11.04	9.70	10.27	9.34	Weekly
April	10.00	7.58	9.25	8.17	11.65	7.32	Weekly
May	9.94	4.04	9.89	8.55	10.22	8.89	Weekly
June	5.83	3.28	7.51	6.02	9.5	8.09	Weekly
July	5.99	3.94	8.13	5.56	9.64	6.81	Weekly
Aug	6.69	5.41	6.93	4.61	9.84	7.43	Weekly
Sept	8.3	2.33	6.97	2.18	9.38	6.43	Weekly
Oct	6.86	2.22	6.3	3.5	9.63	7.81	Weekly
Nov	5.41	4.1	9.38	5.18	10.11	8.45	Weekly
Dec	10.78	4.53	14.66	9.5	10.6	9.66	Weekly
Annual Ave	**8.79**	**5.05**	**9.17**	**6.37**	**10.34**	**7.83**	



2023 Pond Freeboard (Feet)

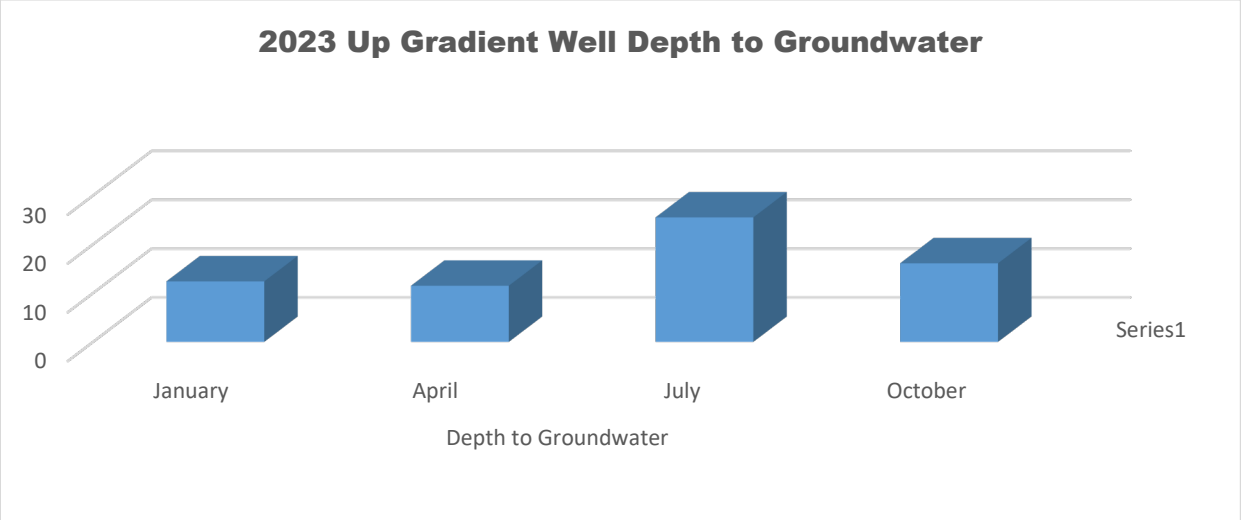
Month	Pond 1 High	Pond 1 Low	Pond 2 High	Pond 2 Low	Pond 3 High	Pond 3 Low
Jan	3’.4”	2’.3”	4’.1”	2’.3”	3’.4”	2’.1”
Feb	3’.10”	3’.4”	4’.3”	2’.10”	4’.2”	2’.11”
March	3’.10”	2’.2”	4’.7”	1’.4”	4’.5”	0’.4”
April	7’.9”	2’.1”	4’.0”	1’.10”	3’.10”	1’.0”
May	8’.0”	3’.8”	7’.3”	4’.9”	5’.4”	3’.10”
June	4’.7”	3’.4”	4’.5”	2’.11”	7’.10”	4’.1”
July	4’.11”	4’.5”	4’.2”	3’.1”	3’.3”	3’
Aug	4’.9”	4’.3”	3’.10”	3’.7”	3’.1”	2’.9”
Sept	4’.8”	4’.5”	4’.7”	3’.8”	3’.3”	2’.10”
Oct	4’.2”	3’.1”	3’.5”	2’.9”	3’.1”	2’.6”
Nov	3’.4”	2’.11”	3’.4”	2’.6”	2’.10”	2’.2”
Dec	3’10”	3’4”	3’2”	2’8”	3’8”	3’2”
Annual Ave	**4’5”**	**3’2”**	**4’2”**	**2’8”**	**3’8”**	**2’4”**
Sample Freq.	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly



Ground Water Monitoring

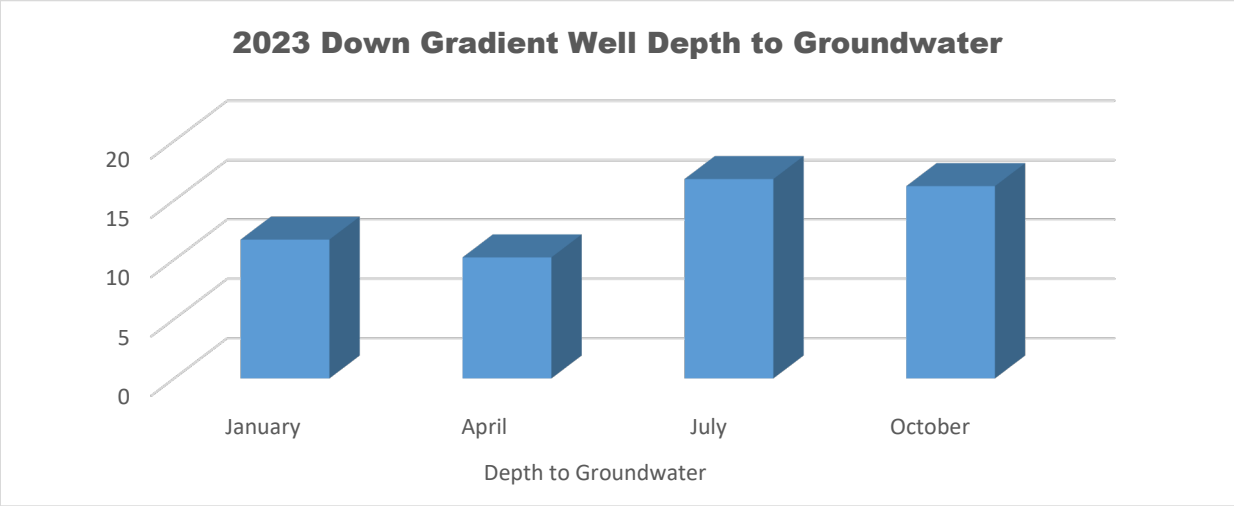
Up-Gradient U2 Well 2023 Depth to Groundwater Quarterly

	January	April	July	October
Depth to Groundwater	12.4	11.5	25.5	16.1



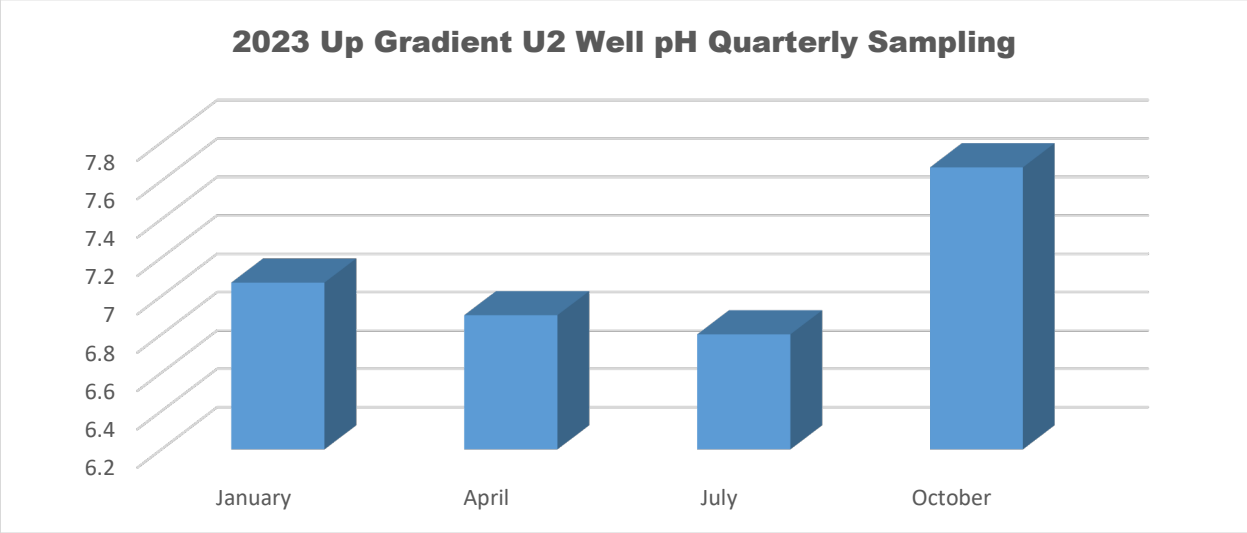
Down-Gradient D2 Well 2022 Depth to Groundwater Quarterly

	January	April	July	October
Depth to Groundwater	11.7	10.2	16.8	16.2



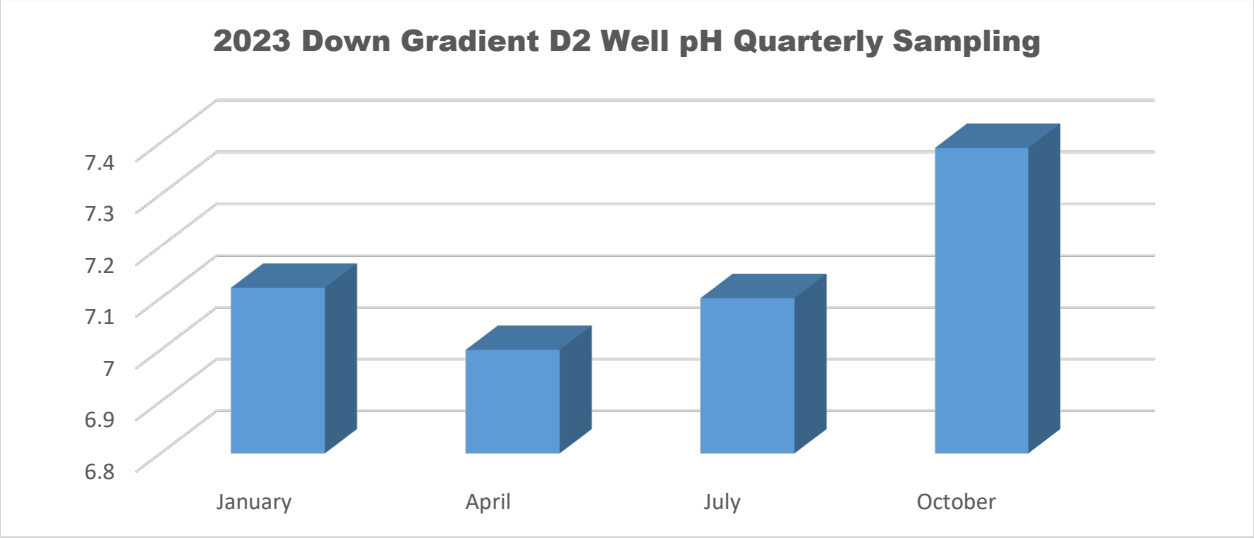
Up-Gradient U2 Well 2023 pH Quarterly

Pollutant	January	April	July	October
pH	7.07	6.90	6.80	7.67



Down-Gradient D2 Well 2023 pH Quarterly

Pollutant	January	April	July	October
pH	7.12	7.0	7.10	7.39

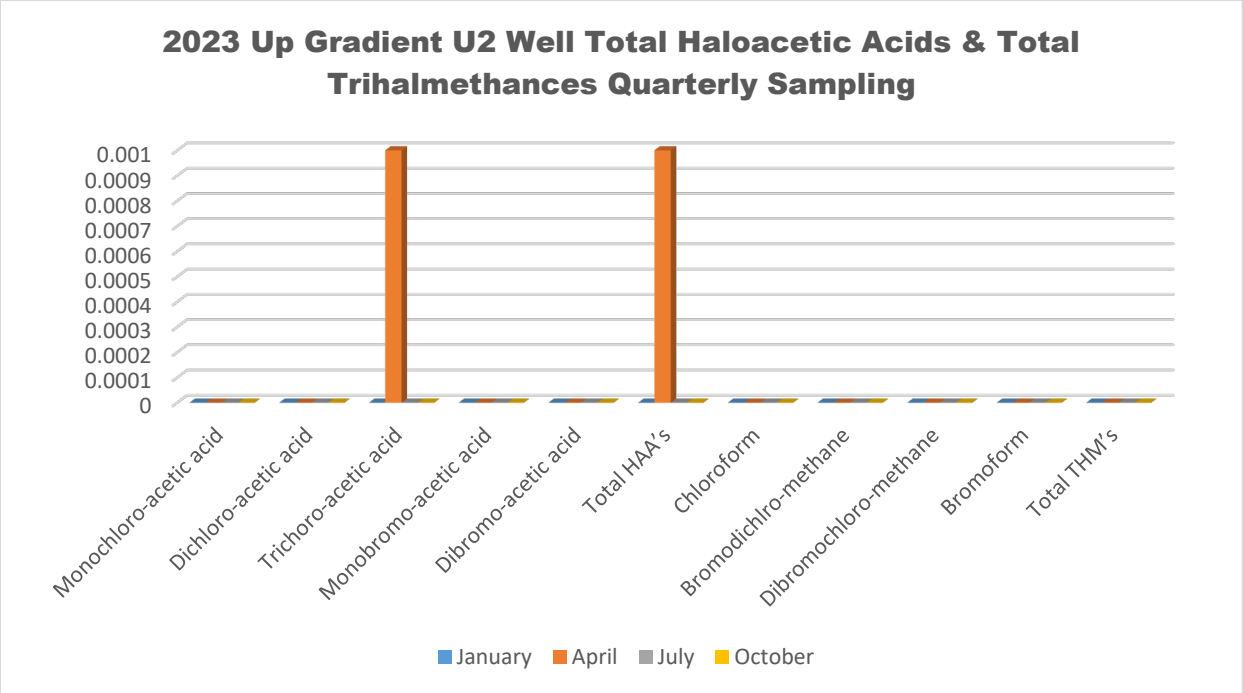


Up-Gradient U2 Well 2023 Quarterly

Total Haloacetic Acids & Total Trihalomethanes

Pollutant	January	April	July	October
Monochloro-acetic acid	ND	ND	ND	ND
Dichloro-acetic acid	ND	ND	ND	ND
Trichoro-acetic acid	ND	0.001	ND	ND
Monobromo-acetic acid	ND	ND	ND	ND
Dibromo-acetic acid	ND	ND	ND	ND
Total HAA's	ND	0.001	ND	ND
Chloroform	ND	ND	ND	ND
Bromodichlro-methane	ND	ND	ND	ND
Dibromochloro-methane	ND	ND	ND	ND
Bromoform	ND	ND	ND	ND
Total THM's	ND	ND	ND	ND

ND = Not Detected

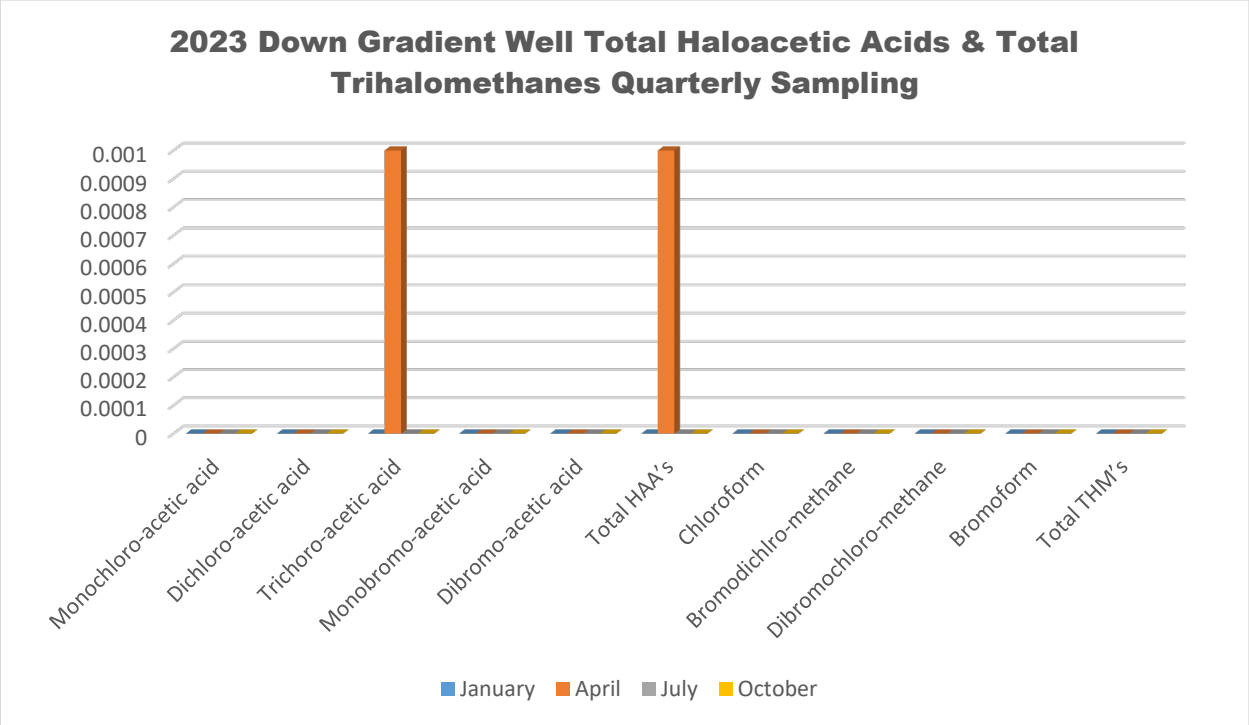


Down-Gradient D2 Well 2023 Quarterly

Total Haloacetic Acids & Total Trihalomethanes

Pollutant	January	April	July	October
Monochloro-acetic acid	ND	ND	ND	ND
Dichloro-acetic acid	ND	ND	ND	ND
Trichoro-acetic acid	ND	0.001	ND	ND
Monobromo-acetic acid	ND	ND	ND	ND
Dibromo-acetic acid	ND	ND	ND	ND
Total HAA's	ND	0.001	ND	ND
Chloroform	ND	ND	ND	ND
Bromodichlro-methane	ND	ND	ND	ND
Dibromochloro-methane	ND	ND	ND	ND
Bromoform	ND	ND	ND	ND
Total THM's	ND	ND	ND	ND

ND = Not Detected

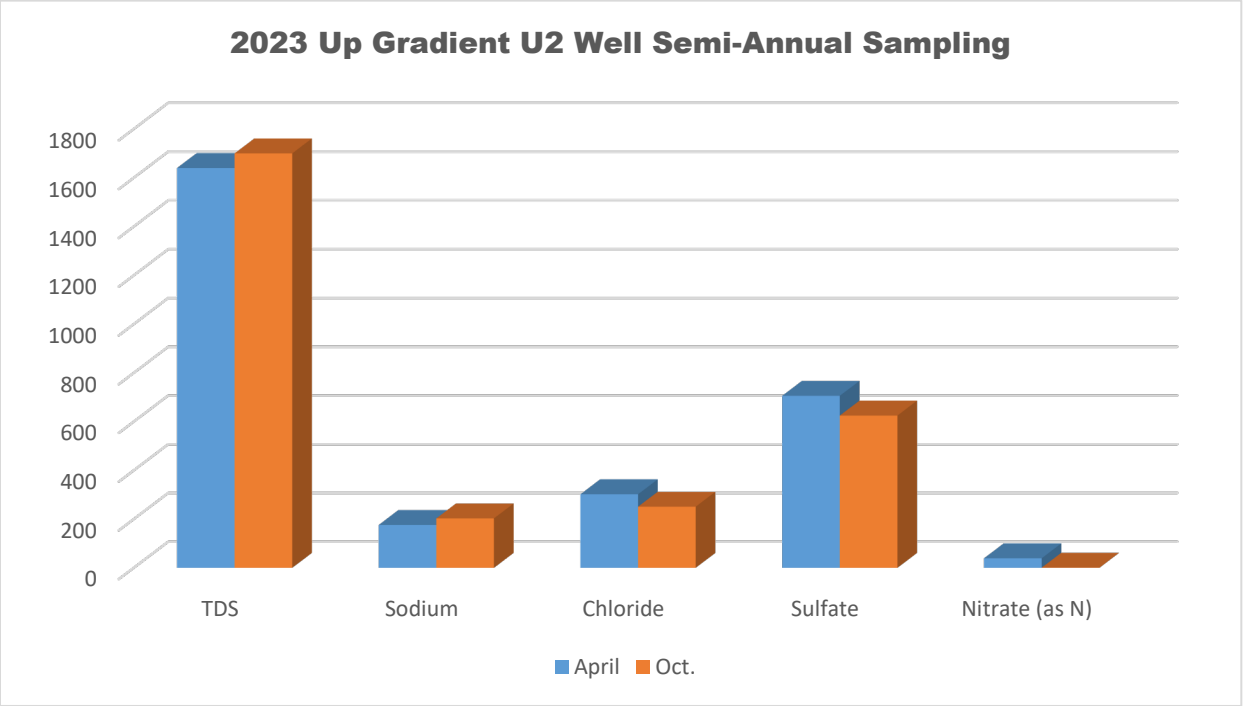


Up-Gradient & Down-Gradient Wells 2023 (Semi-Annual)

Up-Gradient U2 Well 2023 (Semi-Annually)

Pollutant	April	October
TDS	1640	1700
Sodium	176	203
Chloride	302	251
Sulfate	706	625
Nitrate (as N)	39.2	0.8

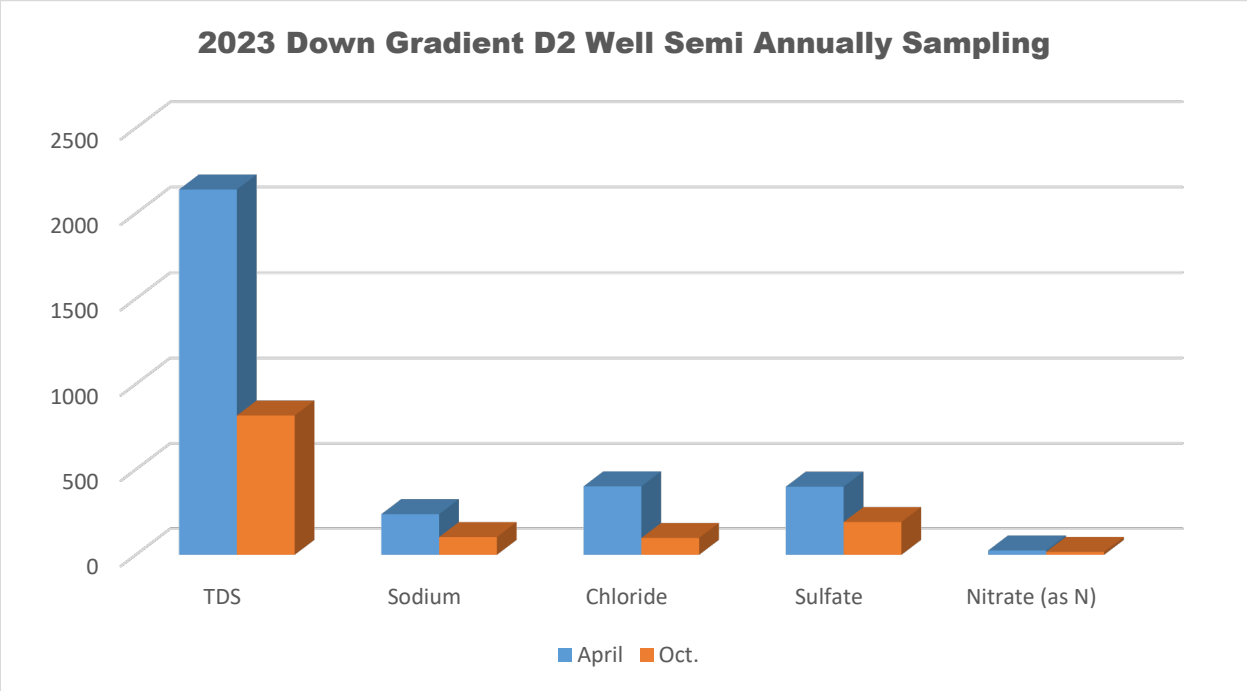
ND = Not Detected



Down-Gradient D2 Well 2023 (Semi-Annually)

Pollutant	April	October
TDS	2140	816
Sodium	238	104
Chloride	401	98.8
Sulfate	399	192
Nitrate (as N)	25.6	17

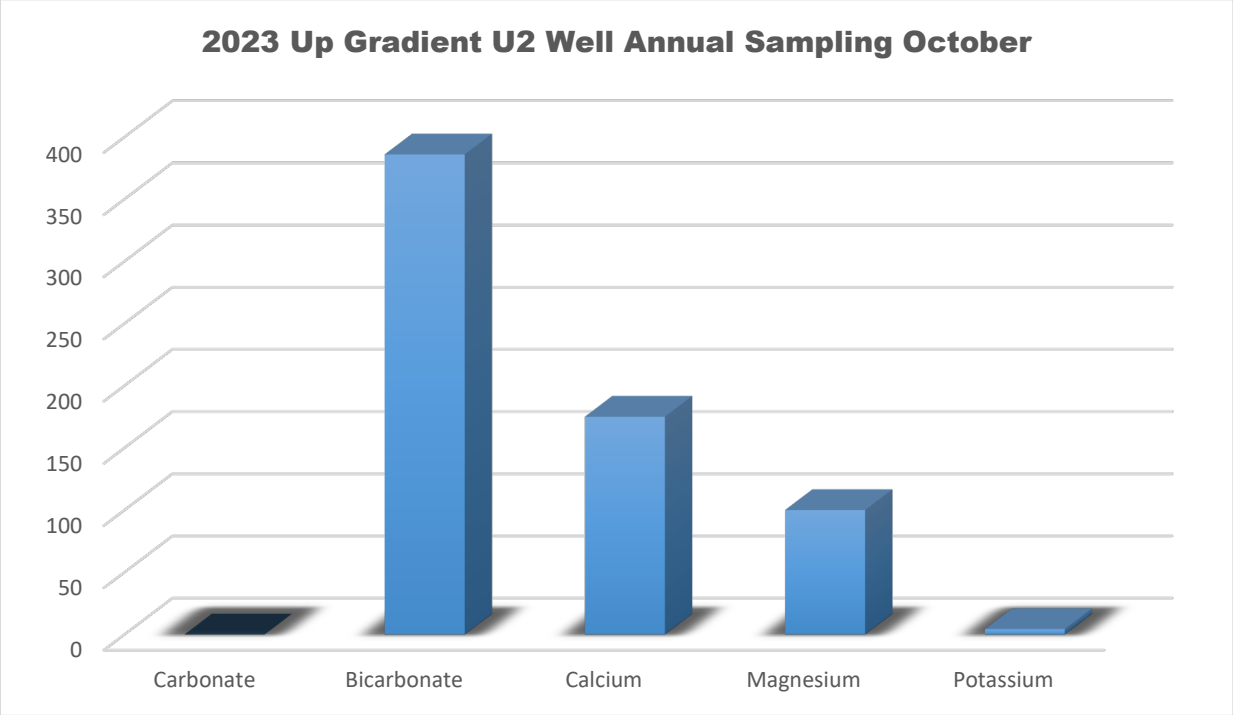
ND = Not Detected



Up-Gradient U2 Well 2023 (Annually)

Pollutant	October
Carbonate	ND
Bicarbonate	386
Calcium	175
Magnesium	100
Potassium	4.4

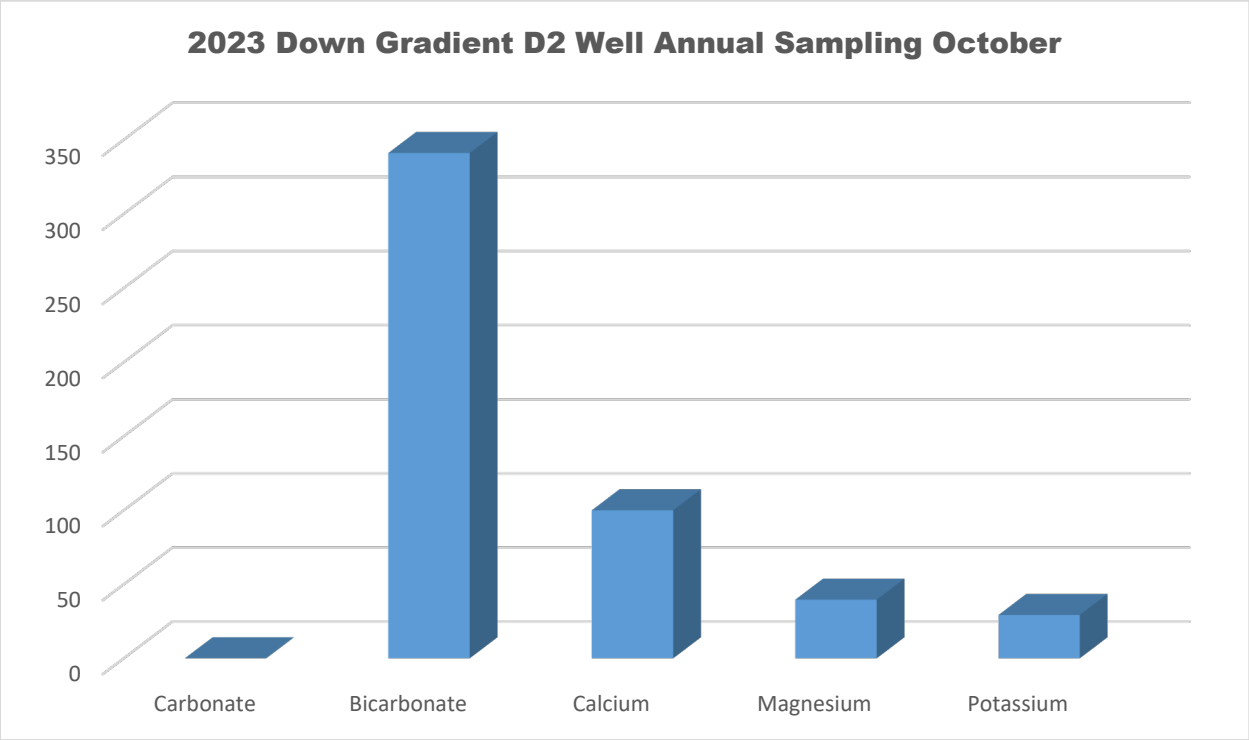
ND = Not Detected



Down-Gradient D2 Well 2023 (Annually)

Pollutant	October
Carbonate	ND
Bicarbonate	341
Calcium	100
Magnesium	39.6
Potassium	29.3

ND = Not Detected



APPENDIX C

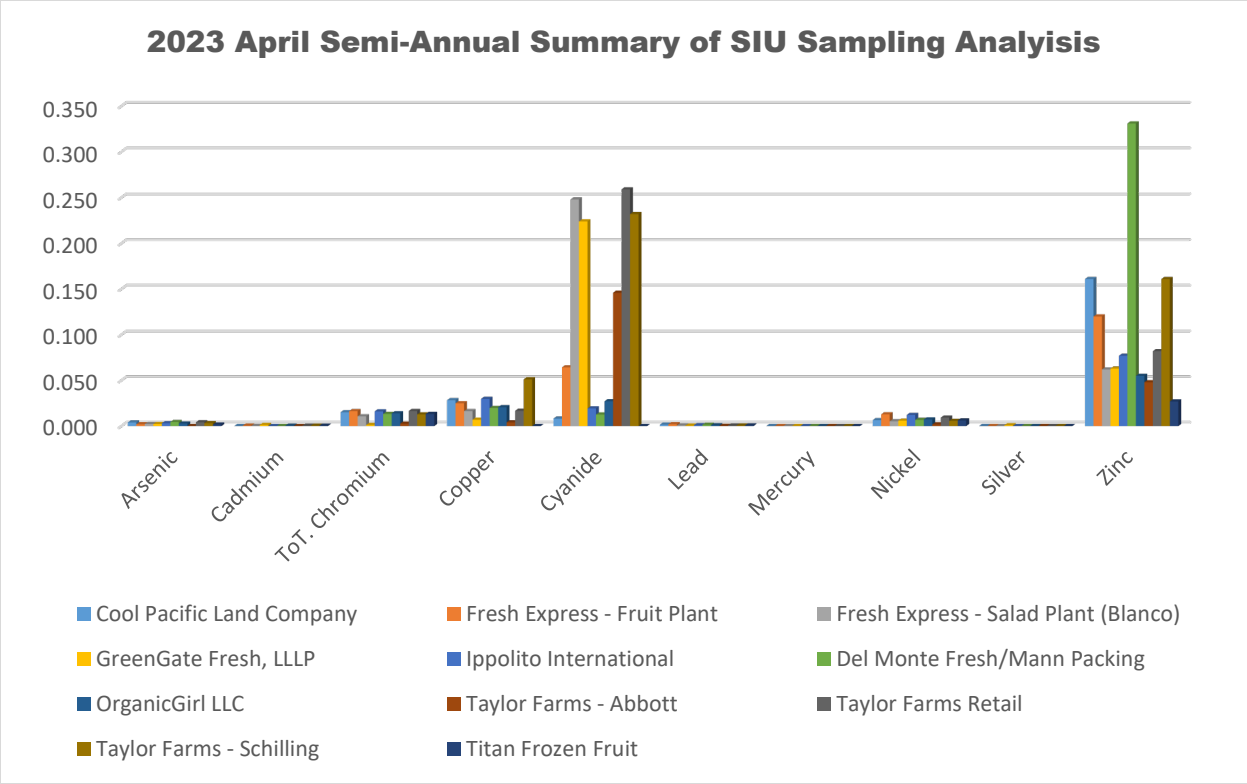
2023 SEMI-ANNUAL SUMMARY OF SIU SAMPLING AND ANALYSIS

April 2023

Pollutant	Arsenic	Cadmium	ToT. Chromium	Copper	Cyanide	Lead	Mercury	Nickel	Silver	Zinc
Cool Pacific Land Company	0.004	ND	0.0152	0.0284	0.0082	0.0016	ND	0.0065	ND	0.161
Fresh Express Fruit Plant	0.002	0.0005	0.0164	0.025	0.0643	0.002	ND	0.0129	ND	0.120
Fresh Express Salad Plant	0.0023	0.0002	0.0107	0.0164	0.248	0.0007	ND	0.005	ND	0.062
GreenGate Fresh LLLP	0.0023	0.0012	0.0012	0.007	0.224	0.0005	ND	0.006	0.0009	0.063
Ippolito International	0.0032	ND	0.0161	0.0298	0.0194	0.001	ND	0.0122	ND	0.077
Del Monte Fresh /Mann Packing	0.0045	ND	0.0133	0.0198	0.0127	0.0014	ND	0.0068	ND	0.331
Organic Girl LLC	0.0029	0.0004	0.014	0.0207	0.0272	0.0009	ND	0.0073	ND	0.055
Taylor Farms - Abbott	ND	ND	0.0027	0.0041	0.146	0.0002	ND	0.0018	ND	0.048
Taylor Farms-Retail	0.0042	0.0004	0.0165	0.0167	0.259	0.0006	ND	0.0093	ND	0.082
Taylor Farms-Schillings	0.0033	0.0004	0.0128	0.0512	0.232	0.0006	ND	0.0057	ND	0.161
Titan Frozen Fruit	0.0017	0.0004	0.0133	ND	ND	0.0007	ND	0.0062	ND	0.027

All analytical results are listed in mg/L with the exception of pH, which is listed in Standard pH Units

ND = Not detected



2023 SEMI-ANNUAL SUMMARY OF SIU SAMPLING AND ANALYSIS

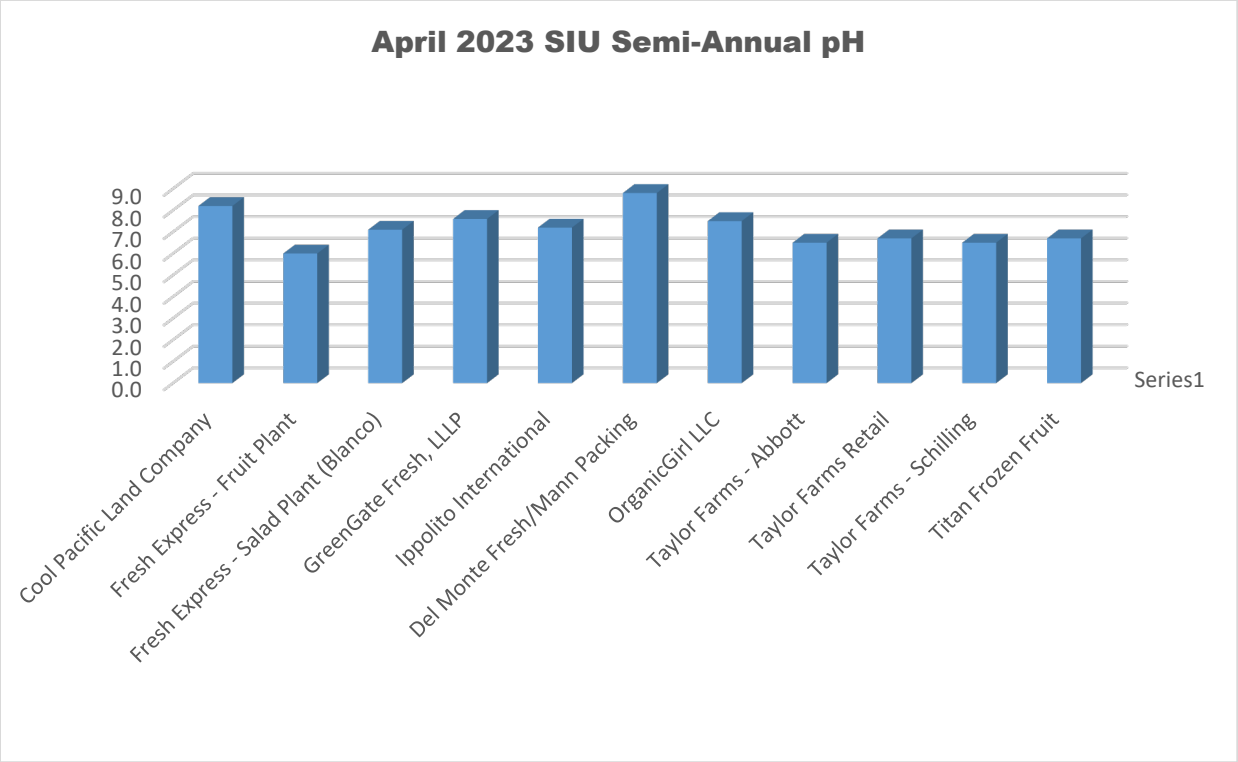
April 2023

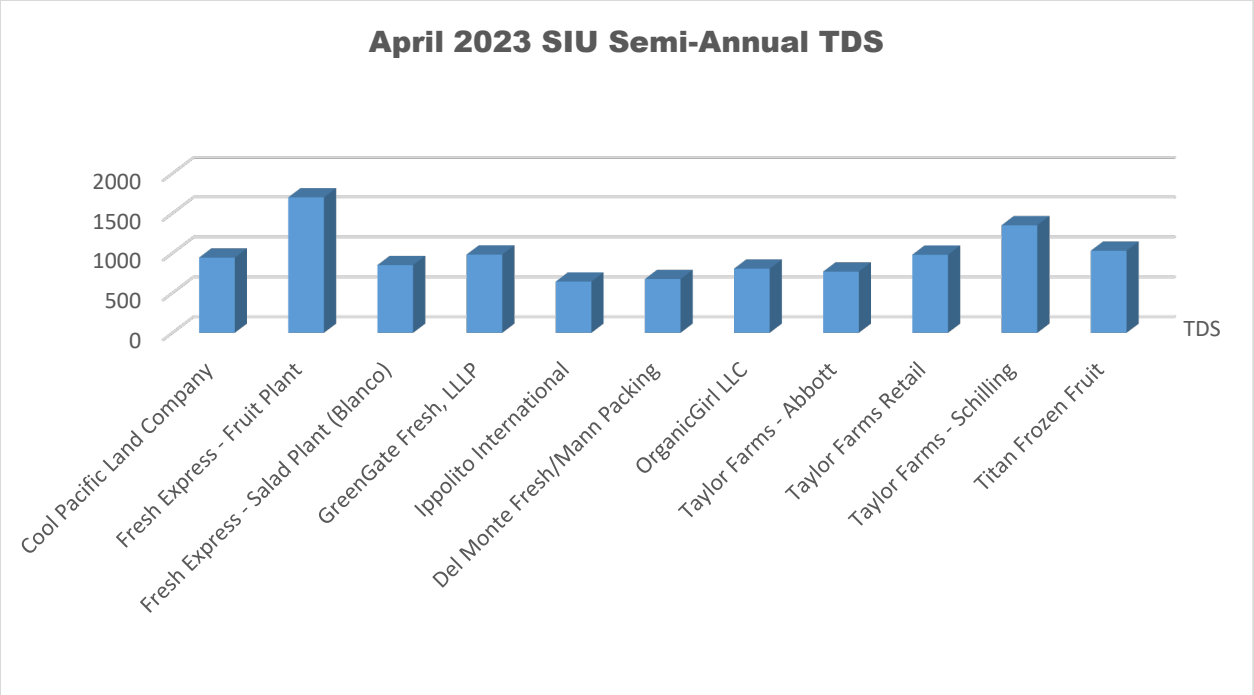
Pollutant	pH	TDS	Chloride
Cool Pacific Land Company	8.2	944	194
Fresh Express Fruit Plant	6.0	1700	21.4
Fresh Express Salad Plant	7.1	850	120
GreenGate Fresh LLLP	7.6	982	129
Ippolito International	7.2	643	77.1
Del Monte Fresh/ Mann Packing	8.8	675	106

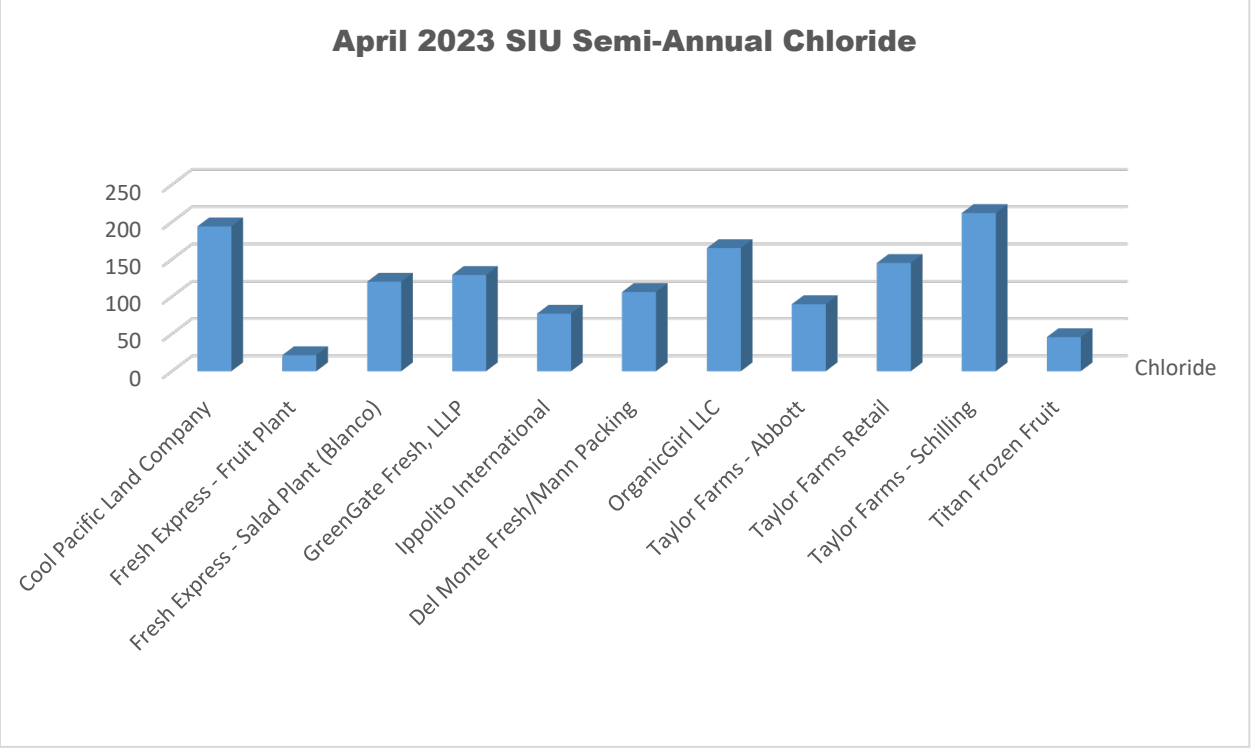
Organic Girl LLC	7.5	805	165
Taylor Farms - Abbott	6.5	768	89.7
Taylor Farms- Retail	6.7	980	145
Taylor Farms- Schillings	6.5	1350	212
Titan Frozen Fruit	6.7	1030	45.6

All analytical results are listed in mg/L with the exception of pH, which is listed in Standard pH Units

ND = Not detected




April 2023 SIU Semi-Annual TDS
2000
1500
1000
500
0
TDS
Cool Pacific Land Company
Fresh Express - Fruit Plant
Fresh Express - Salad Plant (Blanco)
GreenGate Fresh, LLLP
Ippolito International
Del Monte Fresh/Mann Packing
OrganicGirl LLC
Taylor Farms - Abbott
Taylor Farms Retail
Taylor Farms - Schilling
Titan Frozen Fruit


April 2023 SIU Semi-Annual Chloride
250
200
150
100
50
0
Chloride
Cool Pacific Land Company
Fresh Express - Fruit Plant
Fresh Express - Salad Plant (Blanco)
GreenGate Fresh, LLLP
Ippolito International
Del Monte Fresh/Mann Packing
OrganicGirl LLC
Taylor Farms - Abbott
Taylor Farms Retail
Taylor Farms - Schilling
Titan Frozen Fruit

APPENDIX C

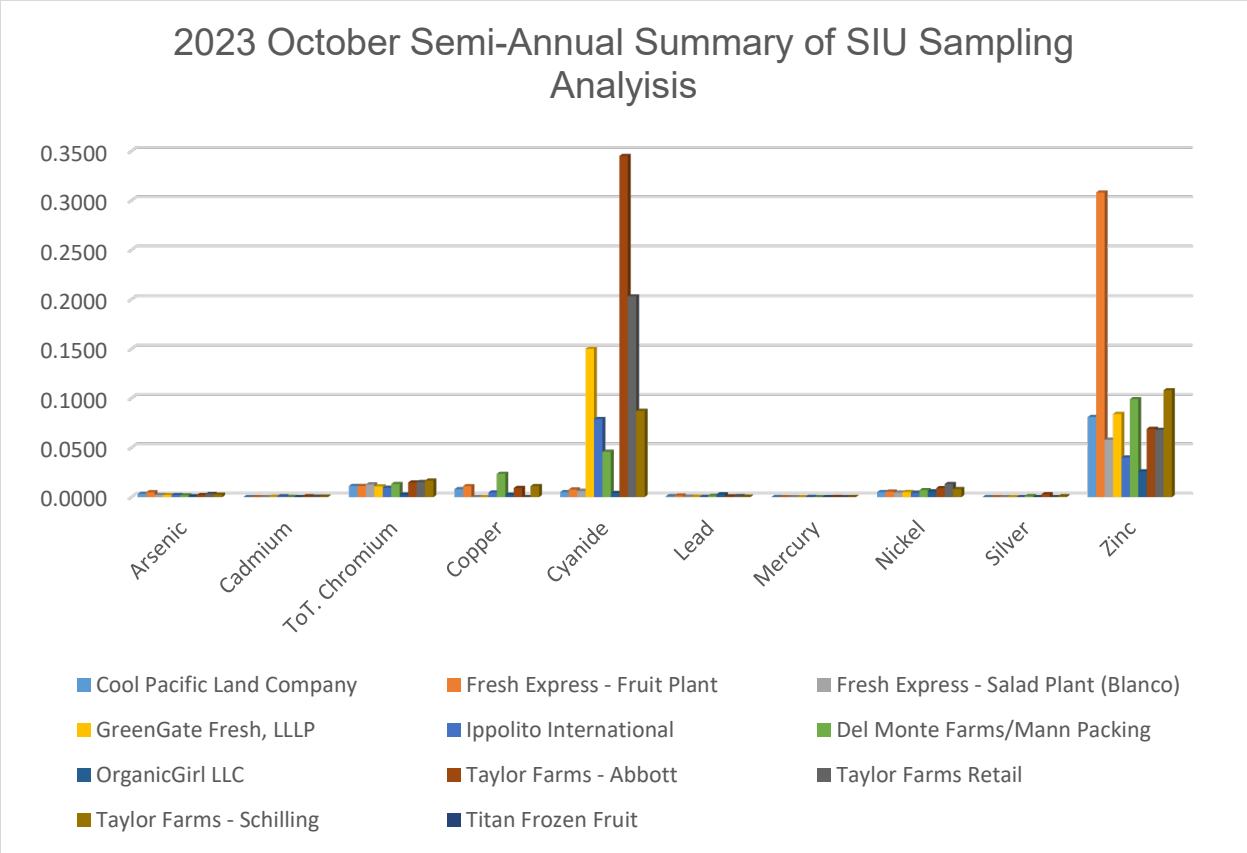
2023 SEMI-ANNUAL SUMMARY OF SIU SAMPLING AND ANALYSIS

October 2023

Pollutant	Arsenic	Cadmium	ToT. Chromium	Copper	Cyanide	Lead	Mercury	Nickel	Silver	Zinc
Cool Pacific Land Company	0.0033	ND	0.0112	0.008	0.005	0.0009	0.000052	0.005	ND	0.081
Fresh Express Fruit Plant	0.0049	ND	0.0112	0.011	0.0076	0.0015	ND	0.0055	ND	0.308
Fresh Express Salad Plant	0.0022	ND	0.0128	ND	0.0062	0.0004	ND	0.0046	ND	0.058
GreenGate Fresh LLLP	0.0021	0.0003	0.0108	ND	0.150	0.0003	ND	0.0051	ND	0.084
Ippolito International	0.0021	0.0008	0.0094	0.0047	0.0789	0.0002	0.00014	0.0044	ND	0.040
Del Monte Fresh /Mann Packing	0.0018	0.0002	0.0132	0.0235	0.0458	0.0013	ND	0.007	0.001	0.099
Organic Girl LLC	0.0008	ND	0.0027	0.0025	0.0041	0.0029	ND	0.0058	ND	0.026
Taylor Farms - Abbott	0.0021	0.0008	0.0147	0.0092	0.345	0.0007	0.00010	0.0091	0.003	0.069
Taylor Farms-Retail	0.0032	0.0004	0.0152	ND	0.203	0.001	ND	0.0132	ND	0.068
Taylor Farms-Schillings	0.0026	0.0004	0.0167	0.0111	0.0872	0.0004	0.000056	0.0081	0.0009	0.108
Titan Frozen Fruit	*	*	*	*	*	*	*	*	*	*

* All analytical results are listed in mg/L with the exception of pH, which is listed in Standard pH Units
* (Titan Frozen Fruit) was not processing during Oct. sampling.

ND = Not detected



2023 SEMI-ANNUAL SUMMARY OF SIU SAMPLING AND ANALYSIS

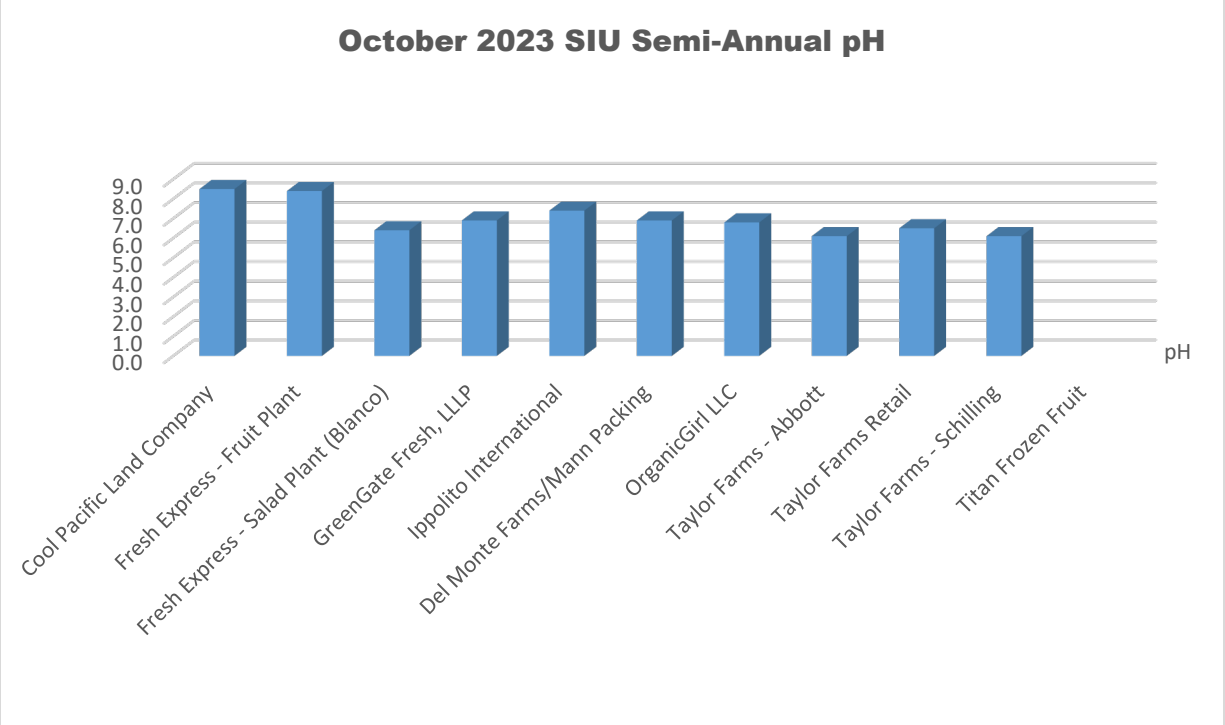
October 2023

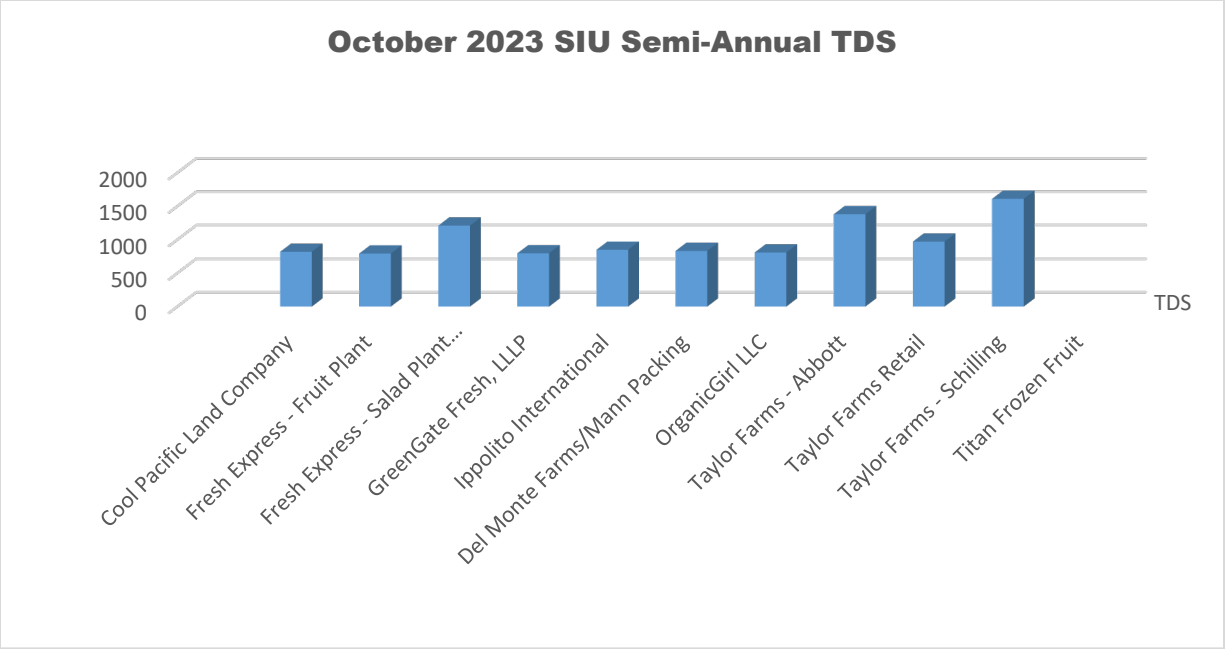
Pollutant	pH	TDS	Chloride
Cool Pacific Land Company	8.5	818	129
Fresh Express Fruit Plant	8.4	792	126
Fresh Express Salad Plant	6.4	1210	48.3
GreenGate Fresh LLLP	6.9	796	108
Ippolito International	7.4	848	109

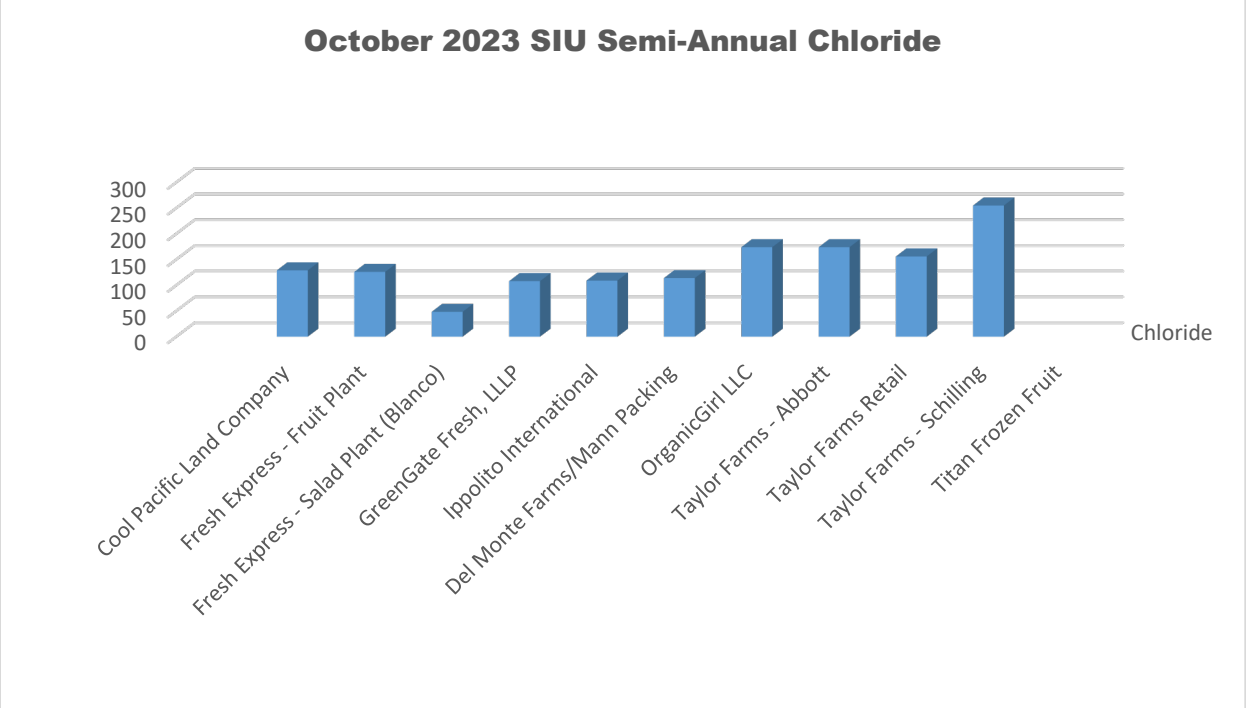
Del Monte Farms/ Mann Packing	6.9	832	114
Organic Girl LLC	6.8	808	174
Taylor Farms - Abbott	6.1	1380	174
Taylor Farms- Retail	6.5	970	156
Taylor Farms- Schillings	6.1	1610	255
Titan Frozen Fruit	*	*	*

All analytical results are listed in mg/L with the exception of pH, which is listed in Standard pH Units
* (Titan Frozen Fruit) was not processing during Oct. sampling.

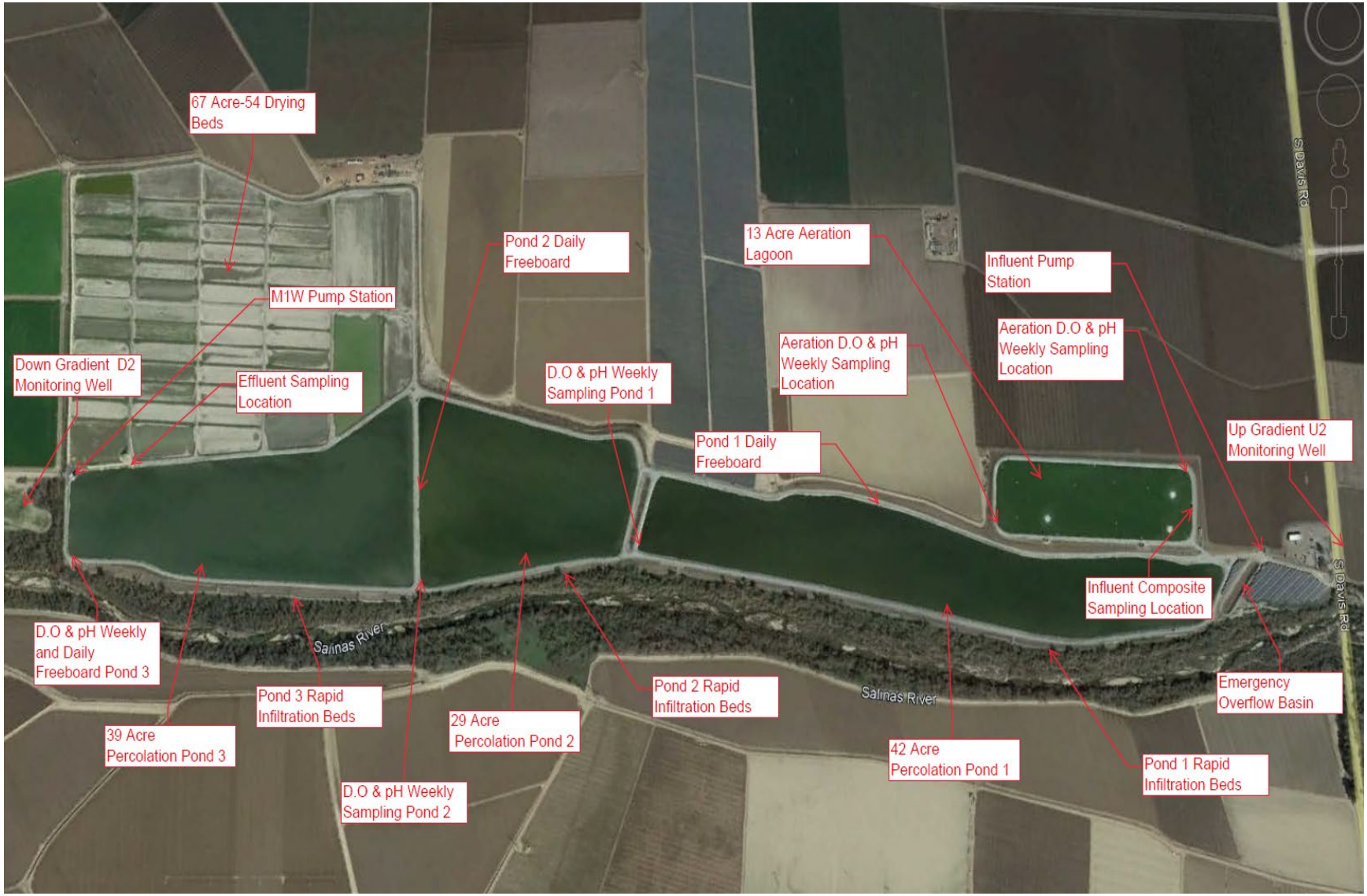
ND = Not detected




October 2023 SIU Semi-Annual TDS
2000
1500
1000
500
0
TDS
Cool Pacific Land Company
Fresh Express - Fruit Plant
Fresh Express - Salad Plant...
GreenGate Fresh, LLLP
Ippolito International
Del Monte Farms/Mann Packing
OrganicGirl LLC
Taylor Farms - Abbott
Taylor Farms Retail
Taylor Farms - Schilling
Titan Frozen Fruit


October 2023 SIU Semi-Annual Chloride
300
250
200
150
100
50
0
Chloride
Cool Pacific Land Company
Fresh Express - Fruit Plant
Fresh Express - Salad Plant (Blanco)
GreenGate Fresh, LLLP
Ippolito International
Del Monte Farms/Mann Packing
OrganicGirl LLC
Taylor Farms - Abbott
Taylor Farms Retail
Taylor Farms - Schilling
Titan Frozen Fruit

2023 Industrial Waste Treatment Facility Map



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