

Table 1—Malaga County Water District Pretreatment Program Compliance 2015 Status

Pretreatment Program Element	Current Compliance Status
Control contribution of SIUs through permits that meet the minimum requirements of the pretreatment program pursuant to 40 CFR section 403.8(f)(1)(iii)(B)	At the 2015 PCI, inspectors observed that SIU permits lacked effective dates and were unsigned. Inspectors also observed that sampling locations were absent or inadequate in permits. Inspectors also observed that District had modified SUI permits to include statement of civil and criminal penalties.
Inspect and sample SIUs once a year as required by 403.8(f)(2)(v)	At the 2015 PCI, sampling and inspection records were so deficient that inspectors could not confirm whether District had complied with requirements.
Require, receive, and analyze reports from its SIUs pursuant to the requirements in 40 CFR section 403.8(f)(2)(iv)	At 2015 PCI, inspectors could not confirm that the industrial user self-monitoring samples were collected and analyzed in accordance with the regulations at 40 CFR 136 due to incomplete records.
Publish a list of users in significant non-compliance as required by 40 CFR section 403.8 (f)(2)(viii)	<p>At 2015 PCI, District representatives appeared unaware of how and when to perform SNC calculations.</p> <p>SNC data calculation sheets provided with 2015 Annual Pretreatment Report indicate that District has developed a protocol for calculating SNC in accordance with federal regulations.</p>
Evaluate whether slug control plan is necessary for each SIU and produce upon request pursuant to 40 CFR section 403.8 (f)(2)(vi)	<p>At 2015 PCI, District representatives seemed unaware of difference between terms “batch discharge” and “slug discharge.”</p> <p>Review of the MCWD Slug Evaluation Report, received on 11 March 2016, is in progress. Preliminary review indicates significant progress in Discharger’s understanding and implementation of requirement.</p>
File materially sufficient annual pretreatment reports pursuant to 40 CFR section 403.12(i), Provision VI. C.5.a.ii at p. 25 of the 2008 Permit, and Provision X.D.4 at pp. E-17-20 of MRP	<p>Not evaluated as part of 2015 PCI.</p> <p>2015 Annual Report (958 pages), dated 29 February 2016, is currently under review by staff for compliance with the 2014 NPDES Permit.</p>
File adequate quarterly pretreatment reports pursuant to the requirements of Provision VI.C.5.a.ii at p. 25 of the 2008 Permit, and Provision X.D.4.d at pp. E-18-19 of the MRP of the 2008 Permit	<p>Not evaluated as part of 2015 PCI.</p> <p>Compliance evaluation of 2014 NPDES Permit Quarterly Pretreatment Reporting requirements is in progress.</p>