



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

May 2, 2024

Rob Lindsay
Environmental Services Administrator
Spokane County Regional Water Reclamation Facility
1116 W Broadway Ave
Spokane, WA 99260

RE: Spokane County Municipal Permit No. WA0093317
Pretreatment Compliance Audit (PCA) Report and Checklist

Dear Rob Lindsay:

I appreciate the time your staff spent with Ecology during the Pretreatment Compliance Audit (PCA) conducted in various sessions on Oct. 30, 2023, Nov. 1, 2023, Nov. 21, 2023, and an in-person site visit on Dec. 12, 2023. Enclosed is the Pretreatment Compliance Audit Report and Checklist.

Based on the PCA Checklist, Spokane County's pretreatment program is in compliance with state and federal rules. Ecology's audit found some identified requirements, with our recommendations included in the checklist. The following is the main requirement from the list:

- CA is advised to complete Cross-Media Electronic Reporting Rule (CROMERR) and have in place before December 20, 2025.

If you have any questions, please contact me at vijay.kubsad@ecy.wa.gov or (509) 329-3473.

Sincerely,

Vijay Kubsad, PhD, PE
Pretreatment Engineer
Water Quality Program, Eastern Region

VK:red

cc/enc: Joshua Villa, Spokane County
Michael Le, EPA Region 10-Pretreatment
Art Jenkins, Ecology, Eastern Region



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code 1 N 2 5	NPDES 3 WA0093317	yr/mo/day 12 231212 17	Inspection Type 18 G	Inspector 19 S	Fac Type 20 1
Remarks 21 _____ 66					
Inspection Work Days 67 20069	Facility Self-Monitoring Evaluation Rating 70 3	BI 71 N	QA 72 N	Reserved 73 _____ 74 75 _____ 80	

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Spokane County 1004 N Freya Street, Spokane, WA 99202 Spokane County, WA 99202 NPDES number: Municipal Wastewater Treatment plant: WA0093317	Entry Time/Date Virtual sessions - 3 and Site visit on 12/12/2023	Permit Effective Date WA0093317 08/01/2022
	Exit Time/Date Site visit in-person 12/12/2023	Permit Expiration Date 31-Jul-27
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers Joshua Villa, Pretreatment Coordinator, email: jvilla@spokanecounty.org; (509) 477-7296 Mia Suhrbier, Engineer 1, email: msuhrbier@spokanecounty.org; (509) 477-7177	Other Facility Data (e.g., SIC, NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Vijay Kubsad, PhD, PE Pretreatment Engineer, Washington State Department of Ecology, WQP 4601 North Monroe St, Spokane, Washington 99205 (509) 329-3473; Fax (509) 329-3570	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	_____

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Vijay Kubsad, PE	Ecology/Spokane/(509) 329-3473 Fax-(509) 329-3570	May 2, 2024
Signature of Management QA Reviewer: Art Jenkins, PE	Ecology/Spokane/(509) 329-3499 Fax-(509) 329-3570	
		May 2, 2024

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A	State (Contractor)	O	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B	EPA (Contractor)	P	Other Inspectors, State (Specify in Remarks columns)
E	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
L	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

EPA Water Compliance Inspection Report

Section D. Summary of Findings/Comments (continued)

The State of Washington Department of Ecology conducted a Pretreatment Compliance Audit (PCA) of the Spokane County's pretreatment program in 3- various sessions in 2023 on: 10/30, 11/1, 11/21 and in-person site visit on 12/12/2023.

Ecology approved the County's pretreatment program and delegated authority for permitting to the County on January 01, 1998. The Spokane County is noted as the Control Authority (CA) in this report.

Ecology identified one-requirement in the pretreatment program that the County (CA) should address. Ecology asks the County to complete the requirement by December 30, 2025.

This finding does not constitute "significant non-compliance" with State and Federal rules.

OBSERVATIONS OF ECOLOGY:

Requirement:

1. Requirement: CA is advised to complete the Cross-Media Electronic Reporting Rule in place (CROMERR) before December 20, 2025.

Upon request, Ecology will assist the County in locating any referenced guidance or EPA manuals to move forward in updating its program.

Section D: COMPLETED BY: **Vijay Kubsad**

TITLE: **Pretreatment Engineer**

DATE: **12/12/2023**

TELEPHONE: **(509) 329-3473**

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS				
Cover Page and Acronym/Abbreviation List				
Section I		Data Review		
Section II		IU File Evaluation		
Section III		Observations and Concerns		
<input checked="" type="checkbox"/>	Attachment A	Pretreatment Program Status Update		
<input checked="" type="checkbox"/>	Attachment B	Pretreatment Program Profile		
<input type="checkbox"/>	Attachment C	Legal Authority Review Checklist		
Attachment D		Worksheets		
<input checked="" type="checkbox"/>		Site Visit Data Sheet		
<input checked="" type="checkbox"/>		WENDB Data Entry Worksheet		
<input type="checkbox"/>		PCA Required ICIS Data Elements Worksheet		
<input checked="" type="checkbox"/>		RNC Worksheet		
Attachment D		Supporting Documentation		
2022 Spokane County Annual pretreatment report (reference)				
Site visit report of Galaxy Compound Semiconductors, Inc. (Galaxy)				
Site visit report of Novation, Inc. (Novation)				
Control Authority (CA) name and address				Date(s) of audit
Spokane County 1004 N Freya Street, Spokane, WA 99202				Virtual Sessions (3): 10/30/2023; 11/1;11/21; and in-person site visit on 12/12/23
Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Spokane County Regional Water Reclamation Facility	WA0093317	08/01/2022	7/31/2027	Yes
AUDITOR(S)				
Name	Title/Affiliation	Telephone Number	Email Address	
Vijay Kubsad	Permit Manager / ERO	(509) 329-3473	vkub461@ecy.wa.gov	
CA REPRESENTATIVE(S)				
Name	Title/Affiliation	Telephone Number	Email Address	
Joshua Villa Mia Suhrbier	Pretreatment Coordinator Engineer 1	(509) 477-7296 (509) 477-7177	jvilla@spokanecounty.org msuhrbier@spokanecounty.org	

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	<i>Code of Federal Regulations</i>
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

<p>1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, <u>less stringent limits</u>, multijurisdictional situation)?</p> <p>If yes, discuss.</p>	Yes	No
		X

<p>b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?</p> <p>If yes, describe.</p>	Yes	No
		X

CA has 2- multijurisdictional agreements in place:

- [Millwood Multijurisdictional Agreement](#)
- [Spokane City and Spokane County Multijurisdictional Agreement](#)

<p>c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?</p> <p>If yes, describe.</p>	Yes	No
		X

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

- N/A, included all of these in the program at delegation.

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

Yes	No

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

Yes	No
	X

If yes, check which ones.

	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]		
2. a. Are there any planned changes to the POTW's treatment plant(s)? If yes, describe.	Yes	No
		X
b. Are these changes to the treatment plant(s) due to pretreatment issues? <ul style="list-style-type: none"> • No pass through and no treatment interference If yes, what were the issues?	Yes	No
		X
B. LEGAL AUTHORITY [403.8(f)(1)]		
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW? If yes, complete questions b–e. b. List the contributing jurisdictions.	Yes	No
<ul style="list-style-type: none"> • Cities and towns in Spokane county (Millwood Town) • City of Spokane (partial) c. Does the CA have an agreement in place that addresses pretreatment program responsibilities? <ul style="list-style-type: none"> • The legal agreement between the City of Spokane and CA is in place. d. Is the CA or the contributing jurisdiction responsible for the following:	X	
	Yes	No
	X	
	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS	X	
Notifying IUs of requirements	X	
Issuance of control mechanisms	X	
Receiving and reviewing IU reports	X	
Conducting inspections	X	
Conducting compliance monitoring	X	
Enforcement of Pretreatment Standards and Requirements	X	

SECTION I: DATA REVIEW (CONTINUED)

B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)		
<p>e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?</p> <p>If yes, explain.</p>	Yes	No
		X
<p>2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?</p> <p>b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?</p> <p>c. Did the CA update its procedures and ERP to implement the changes in its SUO?</p> <p>Explain</p> <ul style="list-style-type: none"> No changes were made to existing ERP plan in place, CA has implemented it effectively. 	Yes	No
	X	
	X	
	X	
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>	Yes	No
		X

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

- The CA uses the federal definition for SIU

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU*?

- N/A

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

- N/A

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

- SIUs are identified based on the volume and characteristics of wastewater discharge.

Discuss any problems.

- No problems noted.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

- The County reviews applications for new business licenses and State Environmental Policy Act (SEPA) documents. CA sends an industrial user survey form to the business entity to identify possible IU or SIU/CIU. Then CA updates its IWS.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

- CA has developed a plan to keep SIU survey current and implemented. This CA surveys ¼ of the IUs every year. The CA has documented the survey process.

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)			
4. How many IUs are identified by the CA in each of the following groups?			
a.	1	SIUs (as defined by the CA) [WENDB – SIUs, RIDE – SIUs]	
		6	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUs, RIDE - CIUs]
		0	Middle-tier CIUs** (specify below)
		0	Noncategorical SIUs
b.	0	Other regulated nonsignificant IUs (specify)	
		0	Noncategorical nonsignificant IUs
		0	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
		2	Zero-discharging CIUs** (specify below)
c.	7	TOTAL	
<p>** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.</p> <p align="center">List of NSCIUs and zero-discharging CIUs:</p> <p>6 CIU</p> <ul style="list-style-type: none"> • Galaxy Compound Semiconductors • Honeywell • Kemira Water Solutions • Lloyd Industries • Novation • US Wax & Polymer <p>1 SIU</p> <ul style="list-style-type: none"> • American On-Site <p>2 MIU</p> <ul style="list-style-type: none"> • Wagstaff Engineering - zero-discharge • MacKay Manufacturing - zero-discharge • zero-discharging - <p align="center">List of Middle-Tier CIUs: <i>N/A</i></p> <p>If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? <u> <i>N/A</i> </u></p> <p align="center">List of SIUs with general control mechanisms: <i>N/A</i></p>			

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]										
<p>1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]</p> <ul style="list-style-type: none"> • All 7 permits and 2- zero-discharge are current. <p>b. Has the CA implemented any general control mechanisms?</p> <ul style="list-style-type: none"> • No general control mechanism, CA has individual permits. <p>c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism:</p> <p style="padding-left: 20px;">N/A</p> <p>d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II] If any, explain.</p>	0	0 %								
<p>2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?</p> <p>b. How are control mechanisms (specifically limits) developed for these facilities? Discuss</p>	N/A									
<p>3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?</p> <p>b. Is any of the waste hazardous as defined by RCRA?</p> <p>c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?</p> <p>d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]</p> <ul style="list-style-type: none"> • The Spokane County RWRf does <u>not</u> have anything coming into the facility via truck or rail, just the dedicated wastewater lines. 	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e0e0e0;"> <th style="padding: 5px;">Yes</th> <th style="padding: 5px;">No</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; padding: 5px;"></td> <td style="text-align: center; padding: 5px;">X</td> </tr> <tr> <td style="text-align: center; padding: 5px;"></td> <td style="text-align: center; padding: 5px;">X</td> </tr> <tr> <td style="text-align: center; padding: 5px;">X</td> <td style="text-align: center; padding: 5px;"></td> </tr> </tbody> </table>	Yes	No		X		X	X		
Yes	No									
	X									
	X									
X										

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

- N/A

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

- Training, manual reading, regular meetings, pretreatment conference and information provided by the Approval Authority.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set?

- Metals (As, Ca, Cr, Cu, Cyanide, Pb, Hg, Ni, Ag, Zinc, Mo), Selenium, Benzene, Total petroleum, and Fats, oils and grease, pH; these pollutants referenced in Spokane County Local limit document submittal.

b. How were these pollutants selected?

- Based on the industry type, wastewater volume and characteristics, and discharge location i.e. groundwater or surface water.

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

- CA adopted limits based on Groundwater Criteria for the industrial POTW, and NPDES limits for the municipal POTW.

d. Which allocation method(s) were used?

- Used uniform concentration method.

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

- The local limits are based on daily maximum and concentration.

f. When was the CA's last local limits evaluation? What was the approval date?

- CA local limits evaluation was completed in 2013 and implemented effective on January 1, 2014.

g. Has the CA identified any pollutants of concern beyond those in its local limits?

Yes	No
	X

If yes, how has this been addressed?

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

- None

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

- CA manages 9-facilities.
- CA does an inspection and samples at least once a year.
- CA determines IU monitoring based on previous permit monitoring results, volume, and characteristic of wastewater, local limits, and EPA guidelines.
- The frequency of monitoring is based on previous permit monitoring results, volume, characteristics, local limits, and EPA guidelines.

b. Is the frequency established above more, less, or the same as required?

Explain any difference.

- pH – Same
 - BOD, TSS and TDS – Same
 - Priority pollutants – Same
- The detail monitoring data were available for review. The facility has asked to include the trend analysis in the annual pretreatment report.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

- The facilities self-monitor. However, the CA does random sampling of BOD and TSS as a check.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period 01/01/2022 to 12/31/2022)

a. Not sampled or not inspected at least once [WENDB – NOIN]

100

%

b. Not sampled at least once [RIDE – SIUs Not Sampled]

100

%

c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]

100

%

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

- All 7 facilities are sampled once in a year.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)							
3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]							
SNC Evaluation Period			01/01/2022 to 12/31/2022				
0	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by:				
0	%	Self-monitoring requirements					
0	%	Pretreatment compliance schedule(s)					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; padding: 5px;">POTW</td> <td style="width: 10%; text-align: center; padding: 5px;">0</td> </tr> <tr> <td style="padding: 5px;">EPA</td> <td style="text-align: center; padding: 5px;">0</td> </tr> </table>				POTW	0	EPA	0
POTW	0						
EPA	0						
b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.: No							
c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements. Evaluation Period: 01/01/2022 to 12/31/2022 Number of SIUs: <u> 1 </u>							
Names of SIUs: 100% in compliance							
1. American On-Site							
4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f) (2) (v) & (vii)].							
<ul style="list-style-type: none"> • The CA uses their own form. The form developed by the CA includes basic inspection requirements. Request a copy of the CA's inspection form, if applicable: Copy of CA inspection form was available for review.							
5. Who performs the CA's compliance monitoring analysis?							
<ul style="list-style-type: none"> • All 7 facilities are sampled once in a year by the CA's contactor-Jacobs. The samples are analyzed by Anatek Labs, Spokane (Accredited by Washington State Department of Ecology). 							
		Performed by: Contract Laboratory					
		Spokane County Water Reclamation facility					
• Metals	Anatek Labs, Spokane						
• Cyanide	Anatek Labs, Spokane						
• Organics	Anatek Labs, Spokane						
• Other (specify): BOD, TSS, TDS, DO, and COD: Anatek Labs, Spokane.							

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)			
6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)] Check all that are applicable.			
QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	x	Sample Splits	x
Chain-of-custody forms	x	Sample Blanks	x
New Sampling Tubes	x	Sample Spikes	x
Field Blanks	x	Other:	
Other:			
7. Discuss any problems encountered in identification of sample location, collection, and analysis. <ul style="list-style-type: none"> • None, Lab did not report any errors. 			
8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)]			
		Yes	No
If yes, summarize.			X
b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs? <ul style="list-style-type: none"> • Hazardous waste reporting requirement is in the facility permit. 			
9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)] <ul style="list-style-type: none"> • Annually List SIUs required to have a slug discharge control plan: <ul style="list-style-type: none"> • All 6-CIU and 1-SIU have slug discharge control plan 			
b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?		Yes	No
		X	
If not, which SIUs have not been evaluated?			

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

- As defined in 40 CFR 403.8(f) (2) (viii); SNC definition exists in the pretreatment program manual; also mentioned below.

Significant Industrial User (or any Industrial User which violates paragraphs (f)(2)(viii)(C), (D), or (H) of this section) is in significant noncompliance if its violation meets one or more of the following criteria:

- (C) Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the public).
- (D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge.
- (H) Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

- Yes

b. Has the ERP been approved by the Approval Authority?

- Yes

c. Does the ERP describe how the CA will investigate instances of noncompliance?

- Yes

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response?

- Yes

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

- Yes

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

- Yes

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

- Yes, ERP is effective. CA had an example to review at the time of inspection.

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.

Yes	No
	X
	X

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)				
	Yes	No		
4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]		X		
If yes, attach a copy.				
If no, explain.				
- No SNC's				
5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?			0	
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?			0	
6. a. Did the CA experience any of the following caused by industrial discharges?				
	Yes	No	Unknown	Explain
• Interference		X		
• Pass through		X		
• Fire or explosions (flashpoint, and such)		X		
• Corrosive structural damage		X		
• Flow obstruction		X		
• Excessive flow rates		X		
• Excessive pollutant concentrations		X		
• Heat problems		X		
• Interference due to oil and grease (O&G)		X		
• Toxic fumes		X		
• Illicit dumping of hauled wastes		X		
• Worker health and safety		X		
• Other (specify)		X		

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)		
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]	Yes	No
		X
7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?	Yes	No
		X
b. If yes, how many were due to nondomestic waste issues (O&G blockages)?		
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
1. How is confidential information handled by the CA? [403.14]		
<ul style="list-style-type: none"> The confidential files are kept in a locked cabinet; Computer files are handled by designated persons using password. Confidential requirements are handled by CA as per County's public disclosure procedure. 		
2. How are requests by the public to review files handled?		
<ul style="list-style-type: none"> Public request for review of files is made to the CA. CA authorizes to review the files. 		

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

- Yes, CA accept electronic report.
- CA is advised to complete Cross-Media Electronic Reporting Rule (CROMERR) and have in place before December 30, 2025.
- It is an online electronic reporting system so that the tributary industrial users can submit the report/DMRs online.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

- Yes, effective and getting better.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

- Revisions to SUO/local limits are processed through County ordinance which goes through County Commission. The County publishes the notice of adoption in the local newspaper and public is given a comment period of 30 days from time of notice.

6. Explain any public or community issues affecting the CA's pretreatment program.

- None

7. How long are records maintained? [403.12(o)]

- 3 years and / or throughout the course of any ongoing litigation related to the IU.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program.

- Legal assistance is referred to the CA's Attorney.
- Permitting / Inspections / Sample Collection / Data Analysis / Enforcement has been handled by the Pretreatment Coordinator and Engineer.
- Sample Analysis handled by outside commercial labs.

Activity	FTEs	Activity	FTEs
Legal Assistance County Attorney	0.1	Sample Analysis	0.2
Permitting	0.6	Data Analysis: Review and Response	0.3
Inspections	0.3	Enforcement	0.3
Sample Collection	0.1	Administration	0.5

Total Number of FTEs | 2.4

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

Yes	No
X	

If not, explain.

3. a. Estimate the annual operating budget for the CA's program.

| \$ **300,000**

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?
Discuss any changes in funding.

- [County is committed to increase funding of the program as needed](#)

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

- [County is committed to full funding of the program.](#)

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)		
<p>c. Is the CA reporting these results to the Approval Authority? If yes, at what frequency?</p> <ul style="list-style-type: none"> • Quarterly and annually in the annual report. 	Yes	No
	X	
<p>2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:</p> <ul style="list-style-type: none"> • Improvements in POTW operations • Loadings to and from the POTW • NPDES permit compliance • Sludge quality? • Sludge disposal options? <p>b. Has the CA documented these findings?</p> <p>Explain. (Attach a copy of the documentation, if appropriate.)</p> <ul style="list-style-type: none"> • CA has an on-line monitoring system to view and control the performance of WWTP. CA has done the trend analysis for pollutants, loading and overall performance parameters. CA is asked to provide this information in the annual report. The sludge is sent to composting. 	Yes	No
	X	
	X	
	X	
	X	
	X	
	X	
<p>3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)</p> <ul style="list-style-type: none"> • CA has done the trend analysis for pollutants and overall performance parameters. The influent loading to POTW is less than 85% of the designed loading. <p>Discuss on a pollutant-by-pollutant basis.</p> <ul style="list-style-type: none"> • The trend analysis for pollutants and overall performance parameters are detailed in the 2022 annual report. 		

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)		
	Yes	No
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	X	

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

- CA's efforts were apparent on pollution prevention in waste/solids minimization.
- County has worked on Pollution minimization plan. The step feed aerator has up to eight dissolved oxygen zones for flexibility in operation. CA (contractor Jacob) has upgraded the primary sludge pumps and planned to replace the membranes and cassettes.
- CA has constructed an equalization tank to streamline the flow to enhance the performance.
- CA is working with Spokane City on PCB evaluation and control plan.

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes	No
X	

Explain.

- CA's efforts were apparent on pollution prevention in waste/solids minimization. CA has documentation of the pollution prevention: see Section I, Subsection K. ADDITIONAL EVALUATIONS/INFORMATION.

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

“Spokane County Pretreatment Program – Report on Pollution Prevention (PCBs/PBDEs, PFAS, Mercury), November 09, 2023

The Spokane County Pretreatment Program intends to meet all requirements of our permit and to maintain/operate the SCRWRF to uphold the effective treatment of PCBs/PBDEs. To date, our treatment process has demonstrated success in removing 99% of the PCBs that enter our facility. The data shows there have been significant reductions of PCBs and PBDEs in our influent flow without implementing traditional source control measures. However, the significant reductions in our influent flow have yet to translate into a significant reduction in effluent, likely due to the high removal efficiency. Spokane County cannot improve the removal of the PCBs that enter our POTW, and as shown by the data, even if the influent load is reduced, it is unlikely to significantly influence our discharge. Further, the data demonstrates that most of the PCBs are a result of domestic users, not industrial users. Spokane County has no means of regulating our domestic users and regulating our industrial users is unlikely to make a substantial reduction. Therefore, Spokane County does not have a PCB/PBDE minimization strategy, other than to continue educating our customer base about PCBs, operating POTW and implementing our IPP program in accordance with regulations, and continuing to monitor our influent/effluent, in case there is new regulatory guidance that requires a change in our strategy.

For PFAS, Spokane County has started inventorying our permitted industrial facilities that use PFAS as part of their processes. Until Spokane County receives guidance on EPA approved PFAS sampling methods and requirements, we are not looking at phasing out or sampling any of the facilities for PFAS in our program.

Finally, for Mercury, our pretreatment program has a local limit for significant industrial users and uses the Dental Amalgam Program to manage waste from dental facilities. “

SECTION I COMPLETED BY : Vijay Kubsad TITLE: Pretreatment Engineer

DATE: 12/12/2023 TELEPHONE: (509) 329-3473

ATTACHMENT A: PRETREATMENT

FILE <u>1</u> Industry name and address Galaxy Compound Semiconductors Inc. (Galaxy) 9922 E Montgomery Ave. Suite 8, Spokane Valley, WA 99206 Permit no.: 3499-01-A	Type of industry: Semiconductor substrate material SIC Code: 3674 NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____ <input type="checkbox"/> Other: <input type="checkbox"/> SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Average total flow (gpd) 1083 gpd	Average process flow 743 gpd
Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Comments <ul style="list-style-type: none"> Manufactures semiconductor substrate material for infrared detectors and metal finishing processes. The hazardous slurry (aluminum oxide) produced during the process (40-50gpd) is disposed offsite. 		
FILE <u>2</u> Industry name and address U.S. Wax and Polymer 17625 E. Euclid Ave Spokane Valley, WA 99216 Permit no.: 3471-02	Type of industry: Food Preparations. Freshly processed potato products; vegetable and pasta side dishes (Year around operation). SIC Code: 2099 NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____ <input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Average total flow (gpd) 7,000 gpd	Average process flow 2,700 gpd
Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Comments <ul style="list-style-type: none"> Anodization of aluminum parts manufactured according to customer 		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	Reg. Cite
File 1	File 2	File	File	File		
Galaxy						
U S Wax & Polymer						
					A. ISSUANCE OF IU CONTROL MECHANISM	
✓	✓				1. Control mechanism application form	
✓	✓				2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
✓	✓				a. Individual control mechanism	
N/A	N/A				b. General control mechanism	403.8(f)(1)(iii)(A)
✓	✓				4. Control mechanism contents	403.8(f)(1)(iii)(B)
✓	✓				a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
✓	✓				b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
✓	✓				c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
					Comments	
					<ul style="list-style-type: none"> The Spokane County has issued Permit to all 7 facilities (6 CIU + 1 SIU). Documents and records are available 	

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓	✓				• Identification of pollutants to be monitored	
N/A	N/A				• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
N/A	N/A				• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
Y	Y				• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
					• Sampling frequency	
N	N				- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
✓	✓				• Sampling locations/discharge points	
✓	✓				• Sample types (grab or composite)	
✓	✓				• Reporting requirements (including all monitoring results)	
✓	✓				• Record-keeping requirements	
<p>Comments</p> <ul style="list-style-type: none"> • File 1 – CA has developed the permit and fact sheet shell per the Ecology and EPA reference. • CA has the filing system for the permits; the documents were available during the audit, I suggested CA to maintain the documents in the following orderly manner. <ul style="list-style-type: none"> - Permit file - Correspondence - DMR - Spill and Slug response documents - Inspection/ Sampling - Enforcements - O & M and Engineering files 						

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
✓	✓				e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
✓	✓				f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
✓	✓				g. Notice of slug loadings	403.12(f)
✓	✓				h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
✓	✓				i. Notification of significant change in discharge	403.12(j)
✓	✓				j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
✓	✓				k. 24-hour notification of violation/resample requirement	403.12(g)(2)
✓	✓				l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments: Spill and Slug discharge and reporting requirement exist in the permit.						

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
N/A	N/A				5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	

					e. Documentation to support the POTW's determination	
Comments:						
- None						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
B. CA APPLICATION OF IU PRETREATMENT STANDARDS						
✓	✓				1. IU categorization	403.8(f)(1)(ii)
N/A	N/A				2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification as an NSCIU	403.3(v)(2)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
✓	✓				3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
N/A	N/A				4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
N/A	N/A				5. Calculation and application of production-based standards	403.6(c)
Comments						
<ul style="list-style-type: none"> None 						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
N/A	N/A				6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
N/A	N/A				7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
N/A	N/A				8. Calculation and application of CWF or FWA	403.6(d)&(e)
N/A	N/A				9. Application of most stringent limit	403.8(f)(1)(ii)
Comments <ul style="list-style-type: none"> • None 						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
N/A	N/A				1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
✓	✓				2. Inspection at frequency specified in approved program	403.8(c)
✓	✓				3. Documentation of inspection activities	403.8(f)(2)(v)
✓	✓				4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
✓	✓				5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
N/A	N/A				a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
					• Sample waived pollutant(s) at least once during the term of the control mechanism	
N/A	N/A				b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
✓	✓				6. Sampling at the frequency specified in approved program	403.8(c)
✓	✓				7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
✓	✓				8. Analysis for all regulated parameters	403.12(g)(1)
✓	✓				9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
<p>Comments</p> <ul style="list-style-type: none"> • CA has not reduced any IU's reporting requirements. • Facilities do their own sampling and analysis as per the permit requirements. 						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
✓	✓				1. Identification of violations	403.8(f)(2)(vii)
✓	✓				a. Discharge violations	
✓	✓				• IU self-monitoring	
✓	✓				• CA compliance monitoring	
✓	✓				b. Monitoring/reporting violations	
✓	✓				• IU self-monitoring	
✓	✓				– Reporting (e.g., frequency, content)	
✓	✓				– Sampling (e.g., frequency, pollutants)	
✓	✓				– Record-keeping	
✓	✓				• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
✓	✓				• Slug discharge control plan	
✓	✓				• Compliance schedule/reports	
✓	✓				c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
<p>Comments</p> <ul style="list-style-type: none"> During the inspection I observed that the U.S. Wax & Polymer facility stores pH adjustment chemicals in the totes. Some of the chemical totes do not have secondary containment, and facility is advised to provide secondary containment to some missing chemical tanks. CA will monitor the requirements. 						

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
✓	✓				2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
✓	✓				3. Response to violation	
✓	✓				4. Adherence to approved ERP	403.8(f)(5)
✓	✓				5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
N	N				6. Escalation of enforcement	403.8(f)(5)(ii)
N/A	N/A				7. Publication for SNC	403.8(f)(2)(viii)
<p>Comments</p> <ul style="list-style-type: none"> No SNC violation 						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File		Reg.
<u>1</u>	<u>2</u>	___	___	___	IU FILE REVIEW	Cite
					E. IU COMPLIANCE STATUS	
✓	✓				1. Self-monitoring and reporting	
✓	✓				a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓	✓				b. Analysis of all required pollutants	403.12(g)(1)&(h)
✓	✓				c. Appropriate analytical methods (40 CFR Part 136)	
✓	✓				d. Appropriate sample collection methods	
✓	✓				e. Compliance with sample collection holding times	
✓	✓				f. Submission of BMR/90-day report	403.12(b) &(d)
✓	✓				g. Periodic self-monitoring reports	403.12(e)&(h)
✓	✓				h. Reporting all required pollutants	403.12(g)(1)&(h)
✓	✓				i. Signatory/certification of reports	403.12(l)
N/A	N/A				j. Annual certification by NSCIUs	403.12(q)
✓	✓				k. Submission of compliance schedule reports by required dates	403.12(c)
✓	✓				l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
✓	✓				• Discharge violation	
✓	✓				• Slug load	
✓	✓				• Accidental spill	
✓	✓				m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
N	N				n. Notification of hazardous waste discharge	403.12(j)&(p)
✓	✓				o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
✓	✓				p. Notification of significant changes	403.12(j)
Comments						

- Facilities do their own sampling and analysis as per the permit requirement.
- The permit for the facility does not require hazardous waste discharge notification.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
E. IU COMPLIANCE STATUS (continued)						
N/A	N/A				2. Compliance with all general control mechanism requirements	
N/A	N/A				3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller) 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant 	
N/A	N/A				4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
					<ul style="list-style-type: none"> • Certification statements with each compliance report 	
Y	Y				5. Compliance with BMR requirements, if applicable (Y/N)	
N/A	N/A				6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
					<ul style="list-style-type: none"> • IU discharges less than 100 gpd of total categorical wastewater 	
					<ul style="list-style-type: none"> • Annual certification statements from the IU 	
Comments: None						

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
E. IU COMPLIANCE STATUS (continued)						
N/A	N/A				7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					<ul style="list-style-type: none"> • IU is effectively operating treatment technologies to achieve compliance 	
					<ul style="list-style-type: none"> • IU is recording the facility's flow rates 	
					<ul style="list-style-type: none"> • IU is recording the facility's production rates 	
					<ul style="list-style-type: none"> • IU has notified the CA whenever production rates vary 	
					<ul style="list-style-type: none"> • IU continues to employ water conservation methods/technologies 	
Comments : None						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File ---	File ---	File ---	IU FILE REVIEW	Reg. Cite
N/A	N/A					
<p>Comments</p> <ul style="list-style-type: none"> None 						
SECTION II COMPLETED BY: Vijay Kubsad					DATE:	12/12/2023
TITLE: Pretreatment Engineer					TELEPHONE:	(509) 329-3473

SECTION III: OBSERVATIONS AND CONCERNS

INSTRUCTIONS: On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.		
Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications <ul style="list-style-type: none"> - Effective • Modification to the program to accommodate the 2005 General Pretreatment Regulation changes <ul style="list-style-type: none"> - N/A 	403.18	I.A.1
	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements <ul style="list-style-type: none"> - Yes, CA lawyer deals with legal issues. • Adequate multijurisdictional agreements <ul style="list-style-type: none"> - Legal multijurisdictional service area document is in place. 	403.8(f)(1)	I.B.2&3
	403.8(f)(1)	I.B.1&3

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> • Application of <i>significant industrial user</i> definition <ul style="list-style-type: none"> - CA use the federal definition. • Application of <i>middle-tier CIU</i> definition <ul style="list-style-type: none"> - CA use the federal definition. • Application of <i>NSCIU</i> definition <ul style="list-style-type: none"> - CA use the federal definition. • Identify and categorize IUs <ul style="list-style-type: none"> - CA use the federal definition. 	403.3(v)(1)	I.C.1; Attach B.E.2
	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> • Issuance of individual or general control mechanisms to all SIUs <ul style="list-style-type: none"> - Issued individual permit to SIUs - effective • Adequate control mechanisms <ul style="list-style-type: none"> - Permits are adequate • Adequate control of trucked, railed, and dedicated pipe wastes <ul style="list-style-type: none"> - No trucked wastewater is discharged at WWTP. 	403.8(f)(1)(iii)	I.D.1
	403.8(f)(1)(iii)(B)	II.A.4
	403.5(b)(8)	I.D.2&3, E.1

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> • Appropriately categorize, notify, and apply all applicable pretreatment standards <ul style="list-style-type: none"> - Yes • Basis and adequacy of local limits <ul style="list-style-type: none"> - The local limits are based on daily maximum and concentration. 	403.8(f)(1)(ii)&(iii)4 03.5	II.B
	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> • Adequate sampling and inspection frequency <ul style="list-style-type: none"> - Yes, effective 	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> • Adequate inspections <ul style="list-style-type: none"> - Yes, effective 	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> • Adequate sampling protocols and analysis <ul style="list-style-type: none"> - Yes 	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
<ul style="list-style-type: none"> • Adequate IU self-monitoring <ul style="list-style-type: none"> - Yes, effective • Notification of changed and hazardous waste discharges <ul style="list-style-type: none"> - Facility notifies any hazardous waste discharge • Evaluate the need for SIUs to develop slug discharge control plans <ul style="list-style-type: none"> - Slug and spill plans are in place. • Monitor to demonstrate continued compliance and resampling after violation(s) <ul style="list-style-type: none"> - Yes, facility does resample when it is required or pointed out by CA 	403.8(f)(2)(iv)	I.F.6,G.5; II.E
	403.12(j)&(p)	I.F.8; II.D.1.b
	403.8(f)(2)(vi)	I.F.9; II.C.4
	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5

G. ENFORCEMENT		
<ul style="list-style-type: none"> • Appropriate application of <i>significant noncompliance</i> definition <ul style="list-style-type: none"> - The CA uses the federal definition for SIU. 	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
<ul style="list-style-type: none"> • Develop and implement an ERP <ul style="list-style-type: none"> - ERP plan is in place with effective implementation. 	403.8(f)(5)	I.G.2; II.D.3
<ul style="list-style-type: none"> • Annually publish a list of IUs in SNC <ul style="list-style-type: none"> - No SNC 	403.8(f)(2)(viii)	I.G.4; II.D.7

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
<ul style="list-style-type: none"> • Effective enforcement <ul style="list-style-type: none"> - Yes, ERP plan is effective. 	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> • Effective data management/public participation <ul style="list-style-type: none"> - Yes, the CA has an effective data management system and are making improvements. The CA is advised to work on pollutant of concern (POC) based on the WWTP performance and the trend analysis. - CA is advised to make improvements to the monitoring plan based on the WWTP performance. - CA has established good communication with industries (email/phone/in person). 	403.5(c)(3); 403.12(o); 403.14	I.H
I. RESOURCES		
<ul style="list-style-type: none"> • Adequate resources • The CA has fulltime dedicated staff to run the pretreatment program and attend the ongoing activities. 	403.8(f)(3)	I.I

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> • Understanding of pollutants from all sources <ul style="list-style-type: none"> - The CA to provides trend analysis and include along with the organized data in the annual report. CA is doing good progress in this direction. 		I.J.1&3
<ul style="list-style-type: none"> • Documentation of environmental improvements/effectiveness <ul style="list-style-type: none"> - CA documented environmental improvements. 		I.J.2
<ul style="list-style-type: none"> • Integration of pollution prevention <ul style="list-style-type: none"> - None currently. 		I.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		
<ul style="list-style-type: none"> - CA is works with Spokane City on pollution prevention plan. 		
SECTION II COMPLETED BY: Vijay Kubsad	DATE: 12/12/2023	
TITLE: Pretreatment Engineer	TELEPHONE: (509) 329-3473	

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE

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PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. Either the auditor or CA should updated this form before each audit on the basis of information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.			
A. CA INFORMATION			
1. CA name: Spokane County			
2. a. Pretreatment contact Joshua Villa (jvilla@spokanecounty.org)		b. Mailing address 1026 W Broadway Avenue Spokane, WA 99206-0430	
c. Title: Pretreatment Coordinator		d. Telephone number (509) 477-7177	
3. Date of last CA report to Approval Authority: - May 1, 2023			
4. Is the CA operating under any pretreatment-related consent decree, <u>Administrative Order</u> , compliance schedule, or other enforcement action?			Yes
			No
			X
5. Effluent and sludge quality			
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)			
Parameters Violated		Cause(s)	
No sludge or effluent limit violations			
b. Has the treatment plant sludge violated these tests?			Yes
<ul style="list-style-type: none"> • EP toxicity • TCLP 			No
			X
			X
6. Does the treatment plant discharge to a 303(d) impaired waterbody? If yes, list the pollutants of concern. – Polychlorinated biphenyls (PCB)			Yes
			No
			X
7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed? If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).			Yes
			No
			X
<ul style="list-style-type: none"> • Spokane River Dissolved Metals TMDL. Zinc, Cadmium, and Lead, May 1999. <ul style="list-style-type: none"> ○ The waste load allocation is based on the most restrictive permit limits based on the comparison of: <ul style="list-style-type: none"> ▪ Potential limits based on meeting aquatic life criteria at effluent hardness, or ▪ Potential limits, plus 10%, based on maintaining existing concentrations of metals in effluent, where adequate data exist. ○ Whichever method results in the lower limit is established as the waste load allocation. • Spokane River and Lake Spokane Dissolved Oxygen TMDL. Ammonia, Phosphorus, and CBOD, February 2010. <ul style="list-style-type: none"> ○ For SCRWRf during treatment season, limits are (TMDL Table 5): <ul style="list-style-type: none"> ▪ Ammonia: variable by month ▪ Phosphorus: 2.80 lbs/day ▪ CBOD: 280.4 lbs/day 			

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS			
1. Indicate components that were identified as deficient.			
	Last PCI	Last Audit	Program Report
	Date: 6/27/2014	Date: 2/27/2019	Date:
a. Program modification	N/A	N/A	
b. Legal authority	N/A	N/A	
c. Local limits	N/A	N/A	
d. IU characterization	N/A	N/A	
e. Control mechanism	N/A	N/A	
f. Application of Pretreatment Standards	N/A	N/A	
g. Compliance monitoring	N/A	N/A	
h. Enforcement program	N/A	N/A	
i. Data management	N/A	N/A	
j. Program resources	N/A	N/A	
k. Other (specify)	N/A	N/A	
2. Is the CA presently in RNC for any of these violations?			
	Data Source	Yes	No
a. Failure to enforce against pass through and/or interference [RNC - I] [SNC]			X
b. Failure to submit required reports within 30 days [RNC - I] [SNC]			X
c. Failure to meet compliance schedule milestones within 90 days [RNC - I] [SNC]			X
d. Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months [RNC - II]			X
e. Failure to inspect or sample 80% of SIUs within the past 12 months [RNC - II]			X
f. Failure to enforce standards and reporting requirements [RNC - II]			X
g. Other (specify) [RNC - II]			X
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
Name of SIU in SNC	Compliance Status	Source	
None identified			
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
			SNC Evaluation Period
0	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by:
0	%	Self-monitoring requirements	POTW 0
0	%	Pretreatment compliance schedules	EPA 0

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

- County has not experienced any problem in implementing the program.

ATTACHMENT A COMPLETED BY: Vijay Kubsad

TITLE: Pretreatment Engineer

DATE: 12/12/2023

TELEPHONE: (509) 329-3473

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ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. The auditor or CA should obtain the needed information from the original, approved pretreatment program submission and modifications and the NPDES permit. The auditor or CA should update this from, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name: Spokane County

2. Original pretreatment program submission date: 11-10-1998

3. Required frequency of reporting to Approval Authority: Annual

4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
<u>Spokane County Regional Water Reclamation Facility (SCRWRF)</u>	<u>WA-0093317</u>	<u>08/01/2022</u>	<u>07/31/2027</u>

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?
If yes, provide the following information.

Yes	No
<u>X</u>	

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
<u>Spokane County Regional Water Reclamation Facility (SCRWRF)</u>	<u>Ecology</u>	<u>08/01/2022</u>	<u>07/31/2027</u>	<u>CBOD₅, TSS, Dissolved Oxygen, Total Residual Chlorine, Fecal Coliform, TN, NO₃, NO₂, NH₃, Alkalinity, pH, TP, TRP, Total Recoverable Al, As, Cd, Cu, Pb, Zn, Hg, Ag, Total PCBs, 2,3,7,8 TCDDs, PBDE, Priority Pollutants, Biomonitoring.</u>

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation?

N/A

2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18] - None

Date Approved	Name of Modification	Date Incorporated in NPDES Permit
	<u>N/A</u>	

PRETREATMENT PROGRAM PROFILE (Continued)

INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.

C. TREATMENT PLANT INFORMATION			
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.			
1. Treatment plant name Spokane County Regional Water Reclamation Facility (SCRWRF)		2. Location address 1004 N Freya Street, Spokane, WA 99202	
3. a. NPDES permit number WA 0093317	b. Expiration date 07/31/2027	4. Treatment plant wastewater flows Design <input type="text" value="8.0"/> mgd Actual <input type="text" value="7.0"/> mgd	
5. Sewer System	a. Separate <input type="text" value="100"/> %	b. Combined <input type="text" value="0"/> %	c. Number of CSOs
6. a. Industrial contribution (mgd)	b. Number of SIUs discharging to plant		c. Percent industrial flow to plant
2021 <input type="text" value="0.10"/>	2019-2021 <input type="text" value="8.0"/>	2021 <input type="text" value="1.30%"/>	
2022 <input type="text" value="0.11"/>	2021-2022 <input type="text" value="7.0"/>	2022 <input type="text" value="1.52%"/>	
7. Level of treatment	Type of Process(es)		
a. Primary	<input checked="" type="checkbox"/>	Fine screens, aerated grit collection, chemically enhanced primary treatment	
b. Secondary	<input checked="" type="checkbox"/>	Step-feed nitrification/denitrification aerated basins combined with ultrafiltration membrane bioreactors (MBR), using ferric chloride addition for odor control and phosphorus removal.	
c. Tertiary	<input checked="" type="checkbox"/>	MBR included with secondary treatment process.	
8. Indicate methods of sludge disposal: Sent to beneficial use facility and land applied.			
Quantity of sludge		Quantity of sludge	
a. Land application	<input type="text"/>	dry tons/year	e. Public distribution
b. Incineration	<input type="text"/>	dry tons/year	f. Lagoon storage
c. Monofill	<input type="text"/>	dry tons/year	g. Other (specify) 2022
d. MSW landfill	<input type="text"/>	dry tons/year	Class B biosolids treated to Class A Compost 2021
			<input type="text" value="1923.3"/> dry tons/year
			2009.2 dry tons/year
D. APPLICATION OF STANDARDS			
If there is more than one treatment plant, were local limits established specifically for each plant?		N/A	Yes
			<input checked="" type="checkbox"/>
			<input type="checkbox"/>

PRETREATMENT PROGRAM PROFILE (Continued)

E. ADDITIONAL INFORMATION

- All biosolids are transported offsite for composting at Barr-Tech.

ATTACHMENT B COMPLETED BY: Vijay Kubsad

DATE: 12/12/2023

TITLE: Pretreatment Engineer

TELEPHONE: (509) 329-3473

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ATTACHMENT C: LEGAL REVIEW CHECKLIST

No Changes in the Sewer Use Ordinance (SUO). Not evaluated during this Audit

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**ATTACHMENT D: SITE VISIT DATA SHEET, WENDB DATA ENTRY WORKSHEET, PCA
REQUIRED ICIS DATA ELEMENTS WORKSHEET, RNC WORKSHEET**

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SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Galaxy Compound Semiconductors, Inc.					
Address of industry: 9922 E Montgomery Ave., Suite 8, Spokane Valley, WA 99206					
Date of visit: 12/12/2023			Time of visit: 1:00 PM to 3:00 PM		
Name of inspector(s):					
<ol style="list-style-type: none"> 1. Vijay Kubsad, Ecology, ERO, Spokane, WA 2. Joshua Villa, Spokane County's representative 3. Mia Suhrbier, Spokane County's representative 					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/E-mail	
Brian Ruchert		HSE Coordinator		(509) 892-1114	
IU Permit Number: SIU 3499-01		Exp Date: 6/30/2024		IU Classification: CIU	
Inspection		<input checked="" type="checkbox"/> Scheduled		<input type="checkbox"/> Unscheduled	
Type/Purpose		<input type="checkbox"/> PCA		<input checked="" type="checkbox"/> PCA	
		<input type="checkbox"/> New Company		<input type="checkbox"/> Complaint	
Please provide the following documentation:					
1. Nature of operation:					
Manufacturer of semiconductor substrate material for infrared detectors and metal finishing processes. SIC Code: 3674					
2. Number of employees		16		Number of shifts:	
				2	
Hours of operation:		5am - 1 am			
3. Water source: Municipal					
4. Waste stream flow(s) discharged to the POTW: Yes					
Sanitary:		340 (gpd)		Process:	
				743(gpd)	
Combined:		1083 (gpd)			
5. Describe any significant changes in process or flow:					
<ul style="list-style-type: none"> • None 					
6. Type of pretreatment system (Describe): Filtration and pH adjustment					
Continuous flow		<input checked="" type="checkbox"/> Batch		<input type="checkbox"/> Combined	
7. Condition/operation of pretreatment system (Describe):					
<ul style="list-style-type: none"> • Condition of operation is good and secured. 					
Any unusual conditions or problems with the pretreatment system:					
<ul style="list-style-type: none"> • 40-50 gallons/year of Aluminum oxide collected as an annual cleanup is disposed off-site. 					

SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used):</p> <p>Raw materials used: Indium antimonide, gallium antimonide, various strong acids for etching processes, alumina, solvents, toluene, methanol, isopropanol.</p> <p>Processes used: refining metals through growing crystals, sawing, etching and polishing wafers.</p>			
<p>9. Condition/operation of process area (Describe):</p> <ul style="list-style-type: none"> • The condition of the operating area is clean. <p>Any unusual conditions or problems with the process area:</p> <ul style="list-style-type: none"> • None 			
<p>10. General housekeeping in process area (Describe):</p> <ul style="list-style-type: none"> • Good 			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):</p> <ul style="list-style-type: none"> • Chemicals stored: nitric acid, hydrofluoric acid, hydrochloric acid, acetic acid, toluene, isopropanol, methanol, caustic soda, crystal cut 300, hydrogen peroxide 30%, maba oil, sodium bicarbonate, soft water salt, tartaric acid. • Chemicals are stored in the secured location and in the containments. 			
Any floor drains?	Yes	Any spill control measures?	Yes
<p>General housekeeping of chemical storage area (Describe):</p> <ul style="list-style-type: none"> • General housekeeping is good. The chemicals are stored and used as per the MSDS. 			
<p>12. Are hazardous wastes drummed and labeled? Yes</p>			
<p>13. Does the IU have hazardous waste manifests? Yes</p>			
<p>Any problems associated with hazardous waste: None</p>			

SITE VISIT DATA SHEET (Continued)

14. Solid waste production: <i>Solid waste is produced from the raw products cleaning/unpacking.</i>					
Solid waste disposal method(s): <ul style="list-style-type: none">• <i>Solid waste is disposed off-site.</i>					
15. Description of sample location: <ul style="list-style-type: none">• <i>The facility has the composite sampler and the flow measurement device at the discharge outlet.</i>					
Sampling method/technique:					
16. Evaluation of self-monitoring data:	X	Yes		No	N/A
If yes, was self-monitoring adequate: <i>Yes.</i>					
17. Who performs the self-monitoring analysis? <ul style="list-style-type: none">• <i>Galaxy performs pH adjustment on-site and sends other samples to contract lab for analysis.</i>					
Notes:					
<ul style="list-style-type: none">• <i>None</i>					

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: U.S. Wax and Polymer					
Date of visit: 12/12/2023			Time of visit: 9:30 AM to 11:30 AM		
Name of inspector(s):					
<ul style="list-style-type: none"> 1. Vijay Kubsad, Ecology, ERO, Spokane, WA 2. Stela Matei-Rowley, Spokane County's representative 3. Anthony Benavidez, Spokane County's representative 					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/E-mail	
Eric Messingale		Manager		(509) 701-8689	
IU Permit Number: SIU 3471-02		Exp. Date: 3/31/2019		IU Classification: CIU	
Inspection		<input checked="" type="checkbox"/> Scheduled		<input type="checkbox"/> Unscheduled	
Type/Purpose		<input type="checkbox"/> PCI		<input checked="" type="checkbox"/> PCA	
				<input type="checkbox"/> New Company	
				<input type="checkbox"/> Complaint	
Please provide the following documentation:					
1. Nature of operation: Anodization of aluminum parts manufactured according to customer specifications.					
2. Number of employees		30		Number of shifts:	
				1	
				Hours of operation:	
				9am – 5pm	
3. Water source: Municipal					
4. Waste stream flow(s) discharged to the POTW: Year 2022					
Sanitary:		4,300 (gpd)		Process:	
				2,700 (gpd)	
				Combined:	
				7,000 (gpd)	
5. Describe any significant changes in process or flow: None					
6. Type of pretreatment system (Describe): pH neutralization					
<input checked="" type="checkbox"/> Continuous flow		<input checked="" type="checkbox"/> Batch		<input type="checkbox"/> Combined	
7. Condition/operation of pretreatment system (Describe):					
<ul style="list-style-type: none"> • Pretreatment is in good condition, some of the chemical totes does not have the secondary containment, and facility is advised to provide secondary containment to some missing chemical tanks. CA will monitor the requirements. 					
Any unusual conditions or problems with the pretreatment system:					
<ul style="list-style-type: none"> • None 					

SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used):</p> <ul style="list-style-type: none"> • Aluminum anodizing, tumbling, polishing, and hexavalent chrome conversion (SIC code 3471). 			
<p>9. Condition/operation of process area (Describe):</p> <ul style="list-style-type: none"> • The condition of the operating area is clean. 			
<p>Any unusual conditions or problems with the process area:</p> <ul style="list-style-type: none"> • None 			
<p>10. General housekeeping in process area (Describe):</p> <ul style="list-style-type: none"> • Good and clean. 			
<p>Any unusual conditions or problems with general housekeeping in process area:</p> <ul style="list-style-type: none"> • None 			
<p>11. Chemical storage area(identify the chemicals that are maintained on-site and how they are stored):</p> <ul style="list-style-type: none"> • Sulfuric acid, nitric acid, phosphoric acid, caustic soda, DeOx. 			
Any floor drains?	Yes	Any spill control measures?	Yes
<p>General housekeeping of chemical storage area (Describe):</p> <ul style="list-style-type: none"> • General housekeeping is good and clean. 			
12. Are hazardous wastes drummed and labeled?		Yes	
13. Does the IU have hazardous waste manifests?		Yes	
Any problems associated with hazardous waste:		None, hazardous waste is sent off-site.	

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:						
<ul style="list-style-type: none"> • Solid waste is produced from the raw products package and cleaning. 						
Solid waste disposal method(s):						
<ul style="list-style-type: none"> • Nonhazardous waste is disposed off-site. 						
15. Description of sample location:						
<ul style="list-style-type: none"> • A composite sampler and a flow measurement device located at the discharge outlet. 						
Sampling method/technique: N/A						
16. Evaluation of self-monitoring data:			Yes	X	No	N/A
If yes, was self-monitoring adequate:						
<ul style="list-style-type: none"> • Yes 						
17. Who performs the self-monitoring analysis?						
<ul style="list-style-type: none"> • Facility staff performs regular monitoring and sampling, samples are sent to a contracted Lab for analysis; pH is measured at the site. 						
Notes:						
<ul style="list-style-type: none"> • None 						

WENDB DATA ENTRY WORKSHEET

WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name: Spokane County			
NPDES number: WA0093317			
Date of inspection: 12/12/2023		Date entered into PCS	
<ul style="list-style-type: none"> • Number of SIUs* <ul style="list-style-type: none"> - Number of SIUs without control mechanism - Number of SIUs not inspected or sampled - Number of SIUs in SNC** with standards or reporting - Number of SIUs in SNC with self-monitoring - Number of SIUs in SNC with self-monitoring and not inspected or sampled • Number of CIUs 	PCS Code	Checklist Reference	Data
	SIUS	I.B.2.a	1
	NOCM	I.C.1.b	0
	NOIN	I.E.2	0
	PSNC	I.F.3.a	0
	MSNC	I.F.3.a	0
	SNIN	I.G.5	0
	CIUS	I.B.2.a	6
*The number of SIUs entered into PCS is based on the CA's definition of <i>Significant Industrial User</i> .			
**As defined in EPA's 1986 <i>Pretreatment Compliance Monitoring and Enforcement Guidance</i> .			
WENDB DATA ENTRY WORKSHEET COMPLETED BY: Vijay Kubsad		DATE: 12/12/2023	
TITLE: Pretreatment Engineer		TELEPHONE: (509) 329-3473	

PCA REQUIRED ICIS DATA ELEMENTS WORKSHEET

▶ TYPE OF COMPLIANCE MONITORING: PCA	
▶ NAME OF PRETREATMENT PROGRAM: Spokane County	
▶ CONTROLLING AUTHORITY NPDES ID: WA0093317	
START DATE OF INSPECTION: virtual sessions on 10/30, 11/1, 11/21, and site inspection on 12/12/2023	▶ END DATE OF INSPECTION: 12/12/2023 (site inspection)
LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]): Vijay Kubsad, Washington State Dept. of Ecology, ERO Spokane WA; (509) 329-3473; vkub461@ecy.wa.gov	
ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]):	

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
▶ SIUs*:	II.B.2.a	I.C.4.a	1
▶ SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	0
▶ SIUs Not Inspected:	II.E.2.c	I.F.2.c	0
▶ SIUs Not Sampled:	II.E.2.b	I.F.2.b	0
▶ SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	0
▶ SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	0
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	0
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	0
Criminal Suits Filed Against SIUs:	II.F.1		0
CATEGORICAL INDUSTRIAL USERS (CIUs)			
▶ CIUs:		I.C.4.a	6
OTHER INFORMATION			
Pass-Through/Interference Indicator (none, Yes, or No)		I.G.6	none
DEFICIENCIES			
Control Mechanism Deficiencies (No or Yes)		I.D.1;II.A.4	No
Inadequacy of Sampling and Inspections (No or Yes)		II.C and Site Visit Sheets	No
Adequacy of Pretreatment Resources (Yes or No)		I.I	Yes

FOOTNOTES:

▶ denotes required information

* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."

** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

DATA ENTRY WORKSHEET COMPLETED BY: Vijay Kubsad, PhD, PE	DATE: 12/12/2023
TITLE: Pretreatment Engineer	TELEPHONE NO.: (509) 329-3473

RNC WORKSHEET

RNC WORKSHEET		
INSTRUCTIONS: Place a check in the appropriate box to the left, if the CA is found to be in RNC or SNC.		
CA name: Spokane County		
NPDES number: WA0093317		
Date of audit: 01/01/2022 and 12/31/2022		
	Level	Checklist Reference
<input type="checkbox"/> Failure to enforce against pass through and/or interference	I	I.G.6
<input type="checkbox"/> Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/> Failure to meet compliance schedule milestone date within 90 days	I	Attach A.B.2.c
<input type="checkbox"/> Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	I.D.1.c
<input type="checkbox"/> Failure to inspect or sample 80% of SIUs within the past 12 months	II	I.F.2.a
<input type="checkbox"/> Failure to enforce Pretreatment Standards and reporting requirements (more than 15% of SIUs in SNC)	II	II.D.1; I.G.2
<input type="checkbox"/> Other (specify)	II	
Note 1 CA is advised to complete the Cross-Media Electronic Reporting Rule (CROMERR) in place before December 20, 2025.	N/A	
SNC		
Please see the attached RNC work sheet report.		
<input type="checkbox"/> 0	CA in SNC for violation of any Level I criterion	
<input type="checkbox"/> 0	CA in SNC for violation of two or more Level II criterion	
For more information on RNC, see EPA's 1990 <i>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</i>		

RNC WORKSHEET COMPLETED BY: Vijay Kubsad, PhD, PE	DATE: 12/12/2023
TITLE: Pretreatment Engineer	TELEPHONE: (509) 329-3473