



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

December 2, 2014

Mr. Kevin Cooke  
Spokane County Division of Utilities  
1026 Broadway Ave  
Spokane, WA 99206-0430

Re: Spokane County's Pretreatment Program Compliance Inspection Results  
NPDES Permit No. WA0024473, WA0093317 and State Permit No. ST0008045

Dear Mr. Cooke:

We sincerely appreciate the time your staff spent with Ecology during the Pretreatment Compliance Inspection (PCI) on June 27, 2014 and July 23, 2014. Enclosed is the PCI Report.

Based on the attached PCI checklist, Spokane County's Pretreatment Program is in compliance.

Ecology recommends the following pretreatment program improvements for Spokane County:

- Add electronic reporting to sewer use ordinance.
- Conduct Industrial User Survey (IUS) for at least 20 percent of existing industrial users every year. This will meet your requirement to survey all industrial dischargers every 5 years.
- IUS results/Matrix:
  - Separate out Industrial Users
    - North Valley Interceptor
    - South Valley Interceptor
    - North Spokane County Interceptor
  - Add restaurants, schools, and other commercial industries that may discharge fats, oil, and grease (FOG)
  - Add dentists, flows, chemicals, and treatment systems (for example: settling, grease traps, amalgam traps, and pH neutralization).

If you have any questions, please contact me at (509) 329-3473 or [smal461@ecy.wa.gov](mailto:smal461@ecy.wa.gov).

Sincerely,

Scott Mallery, PE  
Pretreatment Engineer  
Water Quality Program

SM:jab

Enclosure: Water Compliance Inspection Report

cc: Dale Arnold, City of Spokane  
Dave Moss, PE, Spokane County  
Dave J. Knight, SWRO, Department of Ecology  
Michael Le, EPA Region 10-Pretreatment





# Water Compliance Inspection Report

Transaction Code		NPDES										yr/mo/day							Inspection Type		Inspector		Fac Type					
1	N	2	5	3	W	A	0	0	9	3	3	1	7	11	12	1	4	0	6	2	7	17	18	P	19	S	20	1
Remarks																												

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67   0   8   0   69	70   3	71   N	72   N	73       74   75             80

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) Spokane County, Division of Utilities, 1026 W Broadway Ave, Spokane, WA 99260 City of Spokane Wastewater Treatment Plant, 4401 N Aurbrey L. White Parkway, Spokane, WA 99205 NPDES number: WA-0093317; WA-002447-3 State number: ST0008045	Entry Time/Date 10:00am/Jun 27, 2014 09:00am/Jul 23, 2014	Permit Effective Date 11-Nov-11
	Exit Time/Date 3:00pm/Jun 27, 2014 4:00pm/July 23, 2014	Permit Expiration Date 31-Nov-16
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers Dave Moss, Spokane County Pretreatment Coordinator, (509) 477-7268 Stela Matei, Spokane County Pretreatment Engineer, (509) 477-7177 Anthony Benavidez, Pretreatment/CH2MHill, (509) 536-3703	Other Facility Data (e.g., SIC, NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Scott Mallery, Pretreatment Engineer Washington State Department of Ecology 4601 North Monroe St, Spokane, Washington 99205 (509) 329-3473; Fax (509) 329-3570	Contacted <input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No	

X	Permit	X	Self-Monitoring Program	X	Pretreatment		MS4
X	Records/Reports		Compliance Schedule		Pollution Prevention		
	Facility Site Review		Laboratory		Storm Water		
	Effluent/Receiving Waters		Operations & Maintenance		Combined Sewer Overflow		
	Flow Measurement		Sludge Handling/Disposal		Sanitary Sewer Overflow		

*(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
Scott Mallory <i>Scott Mallory</i>	Ecology/Spokane/(509)329-3479 Fax-(509) 329-3570	10/21/2014
Signature of Management QA Reviewer <i>[Signature]</i>	Agency/Office/Phone and Fax Numbers	Date 10/25/14

# 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 pretreatment compliance inspection (PCI) on Spokane County on June 27 and July 23, 2014. Based off the attached PCI checklist, the Spokane County Pretreatment Program is in compliance.

Ecology recommends the following pretreatment program improvements for Spokane County:

- Add electronic reporting to sewer use ordinance
- Conduct Industrial User Survey (IUS) for at least 20 percent of existing industrial users every year. This will meet your requirement to survey all industrial dischargers every 5 years.
- IUS results/Matrix:
  - Separate out Industrial Users
    - North Valley Interceptor
    - South Valley Interceptor
    - North Spokane County Interceptor
  - Add restaurants, schools, and other commercial industries that may discharge fats, oil, and grease (FOG)
  - Add dentists, flows, chemicals, and treatment systems (for example: settling, grease, traps, amalgam traps, and pH neutralization)

Section D: COMPLETED BY: *Scott Mallery*

TITLE: *Pretreatment Engineer*

DATE: *10/21/2014*

TELEPHONE: *509-329-3473*



# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

## PCI CHECKLIST CONTENTS

Cover Page



Section I

IU File Evaluation



Section II

Supplemental Data Review/Interview



Section III

Evaluation and Summary



Attachment A

Pretreatment Program Status Update



Attachment B

Pretreatment Program Profile



Attachment C

Worksheets



WENDB Data Entry Worksheet



RNC Worksheet



IU Site Visit Report Form (Optional)



File Review Worksheets (Optional)

Attachment D

Supporting Documentation

PUBLIC NOTICE OF SUE FOR KERNICA & GALAXY  
LETTER (11/27/13) NOTICE SUE FOR GALAXY  
SOLUTIONS OF GALAXY PERMIT  
SOLUTIONS OF KERNICA PERMIT + FACT SHEET

CA name and address:

SPOKANE COUNTY REGIONAL WATER RECLAMATION FACILITY  
CNPDES No. WA0093317  
SPOKANE COUNTY UTILITY HANOMAN HILLS (STATE No. S2008045)  
CITY OF SPOKANE AWWTP (CNPDES No. WA004473) CO-PERMITEE FOR PRETREATMENT

Date(s) of PCI

JUNE 27, 2014 & JULY 23, 2014

Period covered by PCI

JAN 1, 2013 THRU DEC 31, 2013

PIRT/DSS incorporated in NPDES permit?

Yes

No

X

### INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
SCO H MALLERY	PRETREATMENT ENGINEER	509-329-3473
PAT HALLINAN	ENVIRONMENTAL ENGINEER	509-329-3500

### CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
DAVE MOSS	PRETREATMENT COORDINATOR / SPOKANE COUNTY	509-477-7268
STEVE MATEI	PRETREATMENT ENGINEER / SPOKANE COUNTY	
ANTHONY BENAVIDEZ	PRETREATMENT / H2M HILL	509-536-3703

identified program contact

## ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full-Time Equivalent
FWA	Flow-Weighted Averaging
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base



# SECTION I: IU FILE EVALUATION

**INSTRUCTIONS:** Select a representative number of files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS			
<b>FILE <u>1</u> Industry name and address</b> SPOKANE COUNTY UTILITIES DIVISION MICA LANDFILL 1026 W BROADWAY AVE SPOKANE, WA 99260		<b>Total flow (gpd)</b>	<b>Process flow (gpd)</b> 126,000 MAX 78000 NEW AVG
		<b>Type of industry (products manufactured)</b> LANDFILL	
<b>Industry visited during PCI</b>  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<b>Applicable Federal category</b>	<b>Compliance status</b>	<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing
<b>Comments</b>			

## SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u>2</u> Industry name and address <u>NOVATION INCORPORATED</u> <u>2616 NORTH LOCUS ROAD</u> <u>SPOKANE VALLEY, WA 99206</u>		Total flow (gpd) <u>                    </u>	Process flow (gpd) <u>10000 MON AUG-</u> <u>12000 DAILY MAX</u>
		Type of industry (products manufactured) <u>METAL FINISHING</u>	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category <u>433.17</u>	Compliance status <input type="checkbox"/> SNC (period: <u>                    </u> ) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			
FILE <u>3</u> Industry name and address <u>KEMIRA WATER SOLUTIONS</u> <u>2315 N SULLIVAN ROAD</u> <u>SPOKANE, VALLEY WA 99216</u>		Total flow (gpd) <u>                    </u>	Process flow (gpd) <u>42,000 BATCH</u>
		Type of industry (products manufactured) <u>INORGANIC CHEMICAL MFG</u>	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category <u>40 CER 415.14</u> <u>&amp; 415.24</u>	Compliance status <input checked="" type="checkbox"/> SNC (period: <u>2013</u> ) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			
<u>PERMIT # SIU-2819-01</u> <u>EXPIRATION: 1/30/15</u> <u>MODIFIED W/UPDATE</u> <u>TO LOCAL LIMITS</u>			
<u>INORGANIC CHEMICALS:</u> <u>• ALUMINUM SULFATE</u> <u>• POLYALUMINUM CHLORIDE</u>			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u>4</u> Industry name and address <u>GALAXY COMPOUND SEMICONDUCTOR</u> <u>9922 E MONTGOMERY AVE SUITE 7</u> <u>SPOKANE VALLEY, WA 99206</u>		Total flow (gpd) <u>10,150</u>	Process flow (gpd) <u>AVG - 8400</u>
		Type of industry (products manufactured) <u>METAL FINISHER</u>	
Industry visited during PCI Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category <u>40317</u>	Compliance status <input checked="" type="checkbox"/> SNC (period: <u>2013</u> ) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
<p>Comments</p> <p><u>NEW PERMIT ID 2014</u> <u>EFFECTIVE DATE: July 1, 2014</u> <u>EXPIRES = 6/30/2019</u></p> <p><u>SLUG DISCHARGE PLAN DUE 9/30/14</u> <u>(UPDATE)</u></p>			
FILE _____ Industry name and address <u>NAI</u>		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			



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# SECTION I: IU FILE EVALUATION (Continued)

Industry Name					<p><i>INSTRUCTIONS: Evaluate the contents of SIU files. Indicate problem areas with an (✓). Use N/A (not applicable) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Leave the space blank when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.</i></p>	
MICA LANDFILL	NOVATION	KEMIRA	GALAXY			
File 1	File 2	File 3	File 4	File	IU FILE REVIEW	Reg. Cite
					<b>A. CA NOTIFICATION OF IU</b>	
					1. Notification of classification or change in classification	403.8(f)(2)(iii)
					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>						

**SECTION I: IU FILE EVALUATION (Continued)**

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>—</u>	IU FILE REVIEW	Reg. Cite
					<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	
<u>A</u>	<u>A</u>				1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
					a. Statement of duration ( $\leq$ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards)	
					d. Self-monitoring requirements	
<u>B</u>					• Identification of pollutants to be monitored	
					• Sampling frequency	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
<u>C</u>	<u>C</u>	<u>C</u>	<u>C</u>		f. Compliance schedules	
<u>D</u>		<u>D</u>	<u>D</u>		g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
<u>E</u>					k. Slug discharge control plan requirement	
<p><b>Comments</b></p> <p>1. A. ISSUED - 11/1/2012 MODIFIED 2/1/14, EXPIRES 10/31/2017</p> <p>2. A. UPDATED LOCAL LIMITS INCLUDED EN PERMIT LIMITS</p> <p>3. C. COMPLETED COMPLIANCE SCHEDULE - NOV 30, 2011</p> <p>4. C. COMPLETED COMPLIANCE SCHEDULE</p> <p>3. D. ACCIDENTAL SPILL PLAN - SLUG DISCHARGE PLAN PRESENTED.</p> <p>4. D. UPDATED SLUG DISCHARGE PLAN DUE 9/2014</p>						



# SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>			
					<b>C. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>	
					1. IU categorization	403.8(f)(1)(ii)
					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	
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA	NA	NA	NA		4. Calculation and application of production-based standards	403.6(c)
NA	NA	NA	NA		5. Calculation and application of CWF or FWA	403.6(d)&(e)
					6. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION I: IU FILE EVALUATION (Continued)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File ___	IU FILE REVIEW	Reg. Cite
					<b>D. CA COMPLIANCE MONITORING</b>	
					<b>Sampling</b>	
<u>A</u>					1. Sampling (once a year)	403.8(f)(2)(v)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis of results for all parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					<b>Inspection</b>	
					6. Inspection (once a year)	403.8(f)(2)(v)
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
<u>B</u>					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(v)
<p><b>Comments</b></p> <p>1. A. LOCAL LIMITS NOT TESTED ON AN ANNUAL BASIS: PRIORITY  pollutant SCAN - 3x's in 2011, ONCE IN 2013, ONCE IN 2015.</p> <p>1. B. IN FACT SHEET UNDER ACCIDENTAL PREVENTION PLAN. SLUG  DISCHARGE CONTROL PLAN NOT REQUIRED.</p>						



# SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1	2	3	4			
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
	A	A	A		2. Calculation of SNC	403.8(f)(2)(vii)
		B	B		3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
		C	C		5. Publication for SNC	403.8(f)(2)(vii)
<b>Comments</b> 3 & 4 A, B, & C: IT APPEARS THAT SPOKANE COUNTY CALCULATED SNC, ADHERED TO APPROVED ERP, AND PUBLISHED SNC CORRECTLY. HOWEVER, THE 2013 ANNUAL REPORT WAS NOT CLEAR ON VIOLATION & CALCULATION FOR SNC						



# SECTION I: IU FILE EVALUATION (Continued)

File 1	File 2	File 3	File 4	File 5	IU FILE REVIEW	Reg. Cite
					<b>F. IU COMPLIANCE STATUS</b>	
					<b>Self-Monitoring and Reporting</b>	
					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b)&(d)
					4. Periodic self-monitoring reports	403.12(e)&(h)
	A				5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Submission of compliance schedule reports by required dates	403.12(c)
					8. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					9. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
B					10. Notification of hazardous waste discharge	403.12(j)&(p)
C					11. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					12. Notification of significant changes	403.12(j)
<b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.</b>						
					<b>Discharge</b>	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
		X	X		b. TRC	
					c. Pass through or interference	[403.5(a)(1)]
					• Spill or slug load	[403.12(f)]
					d. Other discharge violations (specify)	
					<b>Reporting</b>	
			X		15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
		X	X		16. SNC with reporting requirements	403.8(f)(2)(vii)
<b>Comments</b> 2. A. PRIOR PERMIT PERIOD - SAMPLING 11 WEEKS @ FACILITY 1 DME DID NOT HAVE REPORTING FOR MONTHLY AVERAGE VALUES 1. B. IN PERMIT PART II SECTION C 1. C. NOT REQUIRED						



## SECTION I: IU FILE EVALUATION (Continued)

[illegible]

SECTION 1 COMPLETED BY: SCOTT MALLERY  
TITLE: PRETREATMENT ENGINEER

DATE: 10/21/2014  
TELEPHONE: 509-329-3473

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## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

**INSTRUCTIONS:** Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

### A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e.g., definitions, limits)?

Yes	No
	X

If yes, describe.

2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?

Yes	No
	X

If yes, describe.

- SPOKANE COUNTY ADDED A PRETREATMENT WEBSITE FOR THE PUBLIC TO ACCESS. - NOT NEED TO MODIFY PROGRAM FOR THIS ADDITION.
- SUGGESTED TO ADD ELECTRONIC ~~REPORT~~ REPORTING TO ORDINANCE.



## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### B. IU CHARACTERIZATION [403.8(f)(2)(i)&(iii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(ii)]

EVERY 5 YEARS SPOKANE COUNTY UPDATE WASTEWATER DISCHARGE  
TO EXISTING IUS BY SENDING OUT SURVEY.

Every new **IU** is Providing **IU SURVEY** by Business Licenses, Newspaper  
Sewer/water Hookup.

- SUGGESTED: TO ~~DO~~ 20% OF EXISTING IVS EVERY YEAR  
 TO SEPARATED IVS OUT BY NORTH VALLEY INTERSEPTOR  
 SOUTH VALLEY " " " "  
 NORTH - GORHAM CITY LINE  
 NEED TO ADD RESTAURANTS/SCHOOLS ETC FOR FUG  
 + DENTISTS  
 ENSURE THAT FLOWS/CHEMICALS/TREATMENTS SYSTEMS ARE  
 ON IV SURVEY RESULTS/MATRIX.

2. How many IUs are currently identified by the CA in each of the following groups?

a.	§	SIUs (as defined by the CA) [WENDB-SIUS]
----	---	--

6 CIUs [WENDB-CIUS]

### Noncategorical SIUs

b.	1	Other regulated noncategorical IUs (specify)
----	---	--

TOTAL

- ~~NO~~ DISCHARGE FACILITY
- MACKAY MANUFACTURING (40 CFR 433 POSSIBLE C.I.U.)

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

**C. CONTROL MECHANISM EVALUATION** [403.2(f)(1)(iii)]

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism?

9

b. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENDB-NOCM] [RNC-II]

0

%

If any, explain.

2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]

0

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs were not evaluated for the need to develop slug discharge control plans in the last 2 years? [403.8(f)(2)(v)]

0

b. List the SIUs below or attach additional sheets as needed.

IF the Facility need or Doesnt need is stated in the FACT SHEET.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?

N/A	Yes	No
		X

If yes, identify the industries.

If no, explain.

THE COUNTY only accepts Domestic WASTE HAULERS  
THEIR PLANT IS SPECIALLY Design to HANDLE this WASTE.

3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes	No
	X

If yes, identify and explain.



## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### E. COMPLIANCE MONITORING

1. Identify the following.

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
<b>a. Inspection</b>			
• CIUs	6	6	
• Other SIUs	2	2	
<b>b. Sampling (by CA)</b>			
• CIUs	6	6	
• Other SIUs	2	2	
<b>c. Self-Monitoring</b>			
• CIUs	6	6	
• Other SIUs	2	2	
<b>d. Reporting</b>			
• CIUs	6	6	
• Other SIUs	2	2	

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

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

b. Not sampled at least once

c. Not inspected at least once

If any, explain.

	0	%
	0	%
	0	%

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

N/A	Yes	No
	✓	
		✓
		✓
		✓
		✓
		✓
		✓
		✓
	✓	

a. Notice or letter of violation

b. Administrative Orders

c. Administrative fines

d. Show cause hearings

e. Compliance schedules

f. Permit revocation

g. Civil suits

h. Criminal suits

i. Termination of service

j. Other (specify)

Explain if appropriate.

Spokane County Response was appropriate for the enforcement actions  
NEED

2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC-II]

N/A	Yes	No
	✓	

3. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements for the most recent full quarter.

SNC Evaluation Period: Apr - June 2014

0	%
0	%
0	%

Applicable pretreatment standards and reporting requirements

Self-monitoring requirements

Pretreatment compliance schedules

\*SNC defined by:

POTW	✓
EPA	✓



# SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

## F. ENFORCEMENT (Continued)

4. Did the CA publish all SIUs in SNC in the largest daily newspaper in accordance with NPDES permit requirements? [403.8(f)(2)(vii)]

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes, attach a copy. - KEMIRA & GALAXY

If no, explain.

5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB-SNIN]

6. a. Did the CA experience any of the following caused by industrial discharges?

- Interference
- Pass through
- Fire or explosions (flashpoint, etc.)
- Corrosive structural damage
- Flow obstructions
- Excessive flow rates
- Excessive pollutant concentrations
- Heat problems
- Interference due to O&G
- Toxic fumes
- Illicit dumping of hauled wastes
- Worker health and safety
- Other (specify)

Yes	No	Unk	Explain
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		

- b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC-I]

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules?

0

b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date
NA	NA

8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)]

Yes

No

If yes, identify and explain.

9. Did the SIUs return to compliance by any of the following? [RNC-I] (SNL - SIU)

Yes

No

a. Within 90 days

✓

b. Within the time specified in the ERP

✓

c. Through a compliance schedule

✓

### G. ADDITIONAL EVALUATIONS

**INSTRUCTIONS:** Attach additional sheets as needed.

SECTION II COMPLETED BY: SCOTT MALLERY

TITLE: PRETREATMENT ENGINEER

POTW REPRESENTATIVE STELA MATEI

PROVIDING RESPONSES:

DATE: 10/21/2014

TELEPHONE: 509-329-3473

DATE: 7/23/2014

TELEPHONE: 509-477-7177



### SECTION III: EVALUATION AND SUMMARY

**INSTRUCTIONS:** Identify program components that the CA is recommended (Rec.) or required (Req.) to implement in order to effectively implement the pretreatment program and/or to meet its regulatory requirements. Specify the corrective action the CA needs to take.

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>				
1. Notify of program modification	403.18	II.A		
<b>B. IU CHARACTERIZATION</b>				
1. Identify and locate all SIUs	403.8(f)(2)(i)	II.B	X	
<p>o CONDUCT INDUSTRIAL USER SURVEY FOR 20% OF EXISTING IUs Every Year</p> <p>o INDUSTRIAL USER SURVEY/RESULTS/MATRIX:</p> <ul style="list-style-type: none"> <li>- SEPARATE OUT INDUSTRIAL USERS BY: NORTH VALLEY INTERCEPTOR, SOUTH VALLEY INTERCEPTOR AND NORTH SPOKANE COUNTY INTERCEPTOR</li> <li>- ADD RESTAURANTS, SCHOOLS, ETC FOR FAT, OIL, AND GREASE (FOG) AND DENTISTS</li> <li>- ADD FLOWS, CHEMICALS, AND TREATMENT SYSTEMS</li> </ul>				
2. Identify the character and volume of pollutants contributed to POTW by IUs	403.8(f)(2)(ii)	II.B.1; II.E.1		
<b>C. CONTROL MECHANISM EVALUATION</b>				
1. Issue individual control mechanisms to all SIUs	403.8(f)(1)(iii)	I.B.1; II.C.1&2		



### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>C. CONTROL MECHANISM EVALUATION (Continued)</b>				
2. Ensure control mechanisms contents include: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;">             a. A statement of duration              b. A statement of nontransferability              c. Effluent limits              d. Self-monitoring requirements              e. A statement of penalties           </div> <div style="width: 45%;">             f. Compliance schedules              g. Notice of slug loading              h. Notification of spills, bypasses, upsets, etc.              i. Notification of significant change in discharge              j. 24-hour notification of violation/resample requirement           </div> </div>	403.8(f)(1)(iii)	I.B.2.a-j		
<b>D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>				
1. Apply all applicable pretreatment standards	403.8(f)(1)(iii); 403.5	I.C.1-6; II.D.2		
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(v)	I.D.9; II.D.1		
<p style="color: blue; font-family: cursive;">SPOKANE COUNTY EVALUATES EACH SIU FOR SLUG DISCHARGE. TO ENSURE THAT FACILITY IS AWARE OF THIS, COUNTY STATES IN THEIR FACT SHEET IF THE FACILITY NEEDS OR DOESN'T NEED A SLUG DISCHARGE CONTROL PLANS.</p>				
<b>E. COMPLIANCE MONITORING</b>				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.D.2&7; II.E.1		

### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
E. COMPLIANCE MONITORING (Continued)				
2. Inspect and sample each SIU once a year	403.8(f)(2)(v)	I.D.1&6; II.E.1&2		
3. Use proper sampling analysis (40 CFR Part 136) and inspection procedures	403.8(f)(2)(vi)	I.D.3,5&8		
4. Require, receive, and analyze reports from SIUs	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12; II.E.1		
5. Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2)	I.F.3,4&9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months	403.12(g)(1)	I.F.2&5		

### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months	403.12(h)	I.F.2&5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed	403.12(l); 403.6(e)(2)(iii)	I.F.6		
9. Receive notification of hazardous waste discharges	403.12(j)&(p)	I.F.10; II.D.3		
<b>F. ENFORCEMENT</b>				
1. Implement approved ERP	403.8(f)(5)	I.E.3; II.F.2		
2. Annually publish a list of IUs in SNC	403.8(f)(2)(vii)	I.E.5; II.F.4		
CONTINUE TO PUBLISH A LIST OF IUS IN SNC IF NEEDED.				



### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>F. ENFORCEMENT (Continued)</b>				
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1,7&9		
<p style="color: blue; font-style: italic;">CONTINUE to provide IU compliance schedules if needed.</p>				
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	II.F.8		
5. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge	403.12(d)	I.F.3		
<b>G. ADDITIONAL EVALUATIONS</b>				
<p style="color: blue; font-style: italic;">ADD ELECTRONICAL REPORTING TO ORDINANCE.</p>			<p style="color: blue;">II.A. 2</p> <div style="border: 1px solid black; width: 40px; height: 40px; margin: 0 auto; display: flex; align-items: center; justify-content: center;"> <span style="color: blue; font-size: 2em;">X</span> </div>	

SECTION III COMPLETED BY: <u>SCOTT MALLEY</u> TITLE: <u>PRETREATMENT ENGINEER</u>	DATE: <u>10/21/2014</u> TELEPHONE: <u>509-329-3473</u>
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**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 update 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:  
Stela Matei-Rowley

b. Mailing address:  
1026 W Broadway Avenue, 4<sup>th</sup> Floor  
Spokane, WA 99260-0430

c. Title: Pretreatment Engineer

d. Telephone number: (509) 477-7177

3. Date of last CA report to Approval Authority: April 2014

4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?

Yes

No

no

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s)

#### Parameters Violated

#### Cause(s)

Effluent Cadmium daily max. and monthly avg.

Higher than normal influent Cadmium loading

b. Has the treatment plant sludge violated these tests?

- EP toxicity
- TCLP

Yes

No

no

6. Does the treatment plant discharge to a 303(d) impaired waterbody?  
If yes, list the pollutants of concern.

Yes

No

✓

7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed?

Yes

No

yes

If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).

There is a Dissolved Oxygen TMDL covering the water body (Spokane River) receiving flows from the Riverside Park Water Reclamation Facility (RPWRF) and the Spokane County Regional Water Reclamation Facility (SCRWRF).

The pollutants of concern are: Phosphorus, CBOD5, Ammonia (the river is impaired for DO). See NPDES permits WA-002447-3 (RPWRF) and WA-0093317 (SCRWRF) for details.

## PRETREATMENT PROGRAM STATUS UPDATE

### B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

- a. Program modification
- b. Legal authority
- c. Local limits
- d. IU characterization
- e. Control mechanism
- f. Application of Pretreatment Standards
- g. Compliance monitoring
- h. Enforcement program
- i. Data management
- j. Program resources
- k. Other (specify)

[illegible]

2. Is the CA presently in RNC for any of these violations?

- a. Failure to enforce against pass through and/or interference  
[ RNC - I ] [ SNC ]
- b. Failure to submit required reports within 30 days [ RNC - I ] [ SNC ]
- c. Failure to meet compliance schedule milestones within 90 days  
[ RNC - I ] [ SNC ]
- d. Failure to issue/reissue control mechanisms to 90% of SIUs within  
6 months [ RNC - II ]
- e. Failure to inspect or sample 80% of SIUs within the past 12 months  
[ RNC - II ]
- f. Failure to enforce standards and reporting requirements [ RNC - II ]
- g. Other (specify) [ RNC - II ]

[illegible]

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
Kemira Water Solutions	Now in compliance	2013 Pretreatment Report
Galaxy Semiconductors	Now in compliance	2013 Pretreatment Report

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	1/2013 to 12/2013
2	25 %	Applicable Pretreatment Standards and reporting requirements	<b>*SNC defined by:</b>	
0	0 %	Self-monitoring requirements	POTW	2
0	0 %	Pretreatment compliance schedules	EPA	2



## PRETREATMENT PROGRAM STATUS UPDATE

### B. PRETREATMENT PROGRAM STATUS (continued)

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

Spokane County did not experience problems for the implementation of the pretreatment program.

ATTACHMENT A COMPLETED BY: Stela Matei-Rowley, PE

DATE: 6/6/2014

TITLE: Pretreatment Engineer

TELEPHONE: (509)477-7177

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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.

<b>A. CA INFORMATION</b>				
1. CA name    Spokane County				
2. Original pretreatment program submission date    11-10-1998				
3. Required frequency of reporting to Approval Authority    Once a year – the annual report				
4. Specify the following CA information				
<b>Treatment Plant Name</b>	<b>NPDES Permit Number</b>	<b>Effective Date</b>	<b>Expiration Date</b>	
Spokane County Regional Water Reclamation Facility (SCRWRF)	WA-0093317	12/1/2011	11/30/2016	
City of Spokane Riverside Park Water Reclamation Facility (RPWRF)	WA-002447-3	7/1/2011	6/30/2016	
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.			<b>Yes</b> Yes	<b>No</b> 
<b>POTW Name</b>	<b>Issuing Authority</b>	<b>Issuance Date</b>	<b>Expiration Date</b>	<b>Regulated Pollutants</b>
Spokane County General Permit for Biosolids Management #BT1103	State of WA Dept. of Ecology	8/20/10	8/20/15	N/A
<b>B. PRETREATMENT PROGRAM MODIFICATIONS</b>				
1. When was the CA's NPDES permit first modified to require pretreatment implementation?				
2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]				
<b>Date Approved</b>	<b>Name of Modification</b>	<b>Date Incorporated in NPDES Permit</b>		
10/3/2013 <i>7/15/2013</i>	Local Limits update <i>streaming updates</i>	Effective date for new Local Limits: 1/1/2014		

## PRETREATMENT PROGRAM PROFILE (Continued)

<b>C. TREATMENT PLANT INFORMATION</b>																					
<b>INSTRUCTIONS:</b> Complete this section for each treatment plant operated under an NPDES permit issued to the CA.																					
<b>1. Treatment plant name</b> Spokane County Regional Water Reclamation Facility (SCRWRF)  City of Spokane Riverside Park Water Reclamation Facility (RPWRF)					<b>2. Location address</b> 1004 N Freya Street, Spokane, WA 99202  4401 N Aubrey L. White Parkway, Spokane, WA 99205-3939																
<b>3. a. NPDES permit number</b> WA-0093317 WA-002447-3		<b>b. Expiration date</b> 11/30/2016 6/30/2016		<b>4. Treatment plant wastewater flows</b>  <table style="width: 100%; border: none;"> <tr> <td style="text-align: right;">Design</td> <td style="border: 1px solid black; width: 50px; text-align: center;">8</td> <td style="text-align: right;">mgd</td> <td style="text-align: right;">Actual</td> <td style="border: 1px solid black; width: 50px; text-align: center;">6.8</td> <td style="text-align: right;">mgd</td> </tr> <tr> <td></td> <td style="border: 1px solid black; text-align: center;">44</td> <td></td> <td></td> <td style="border: 1px solid black; text-align: center;">28.4</td> <td></td> </tr> </table>						Design	8	mgd	Actual	6.8	mgd		44			28.4	
Design	8	mgd	Actual	6.8	mgd																
	44			28.4																	
<b>5. Sewer System</b>		<b>a. Separate</b> 100 %		<b>b. Combined</b> 0 %		<b>c. Number of CSOs</b> 0															
<b>6. a. Industrial contribution (mgd)</b>  2013 SCRWRF 0.0544 2013 RPWRF 0.447		<b>b. Number of SIUs discharging to plant</b>  2013 SCRWRF 7 2013 RPWRF 16		<b>c. Percent industrial flow to plant</b>  2013 SCRWRF 0.8 2013 RPWRF 1.6																	
<b>7. Level of treatment</b>			<b>Type of Process(es)</b>																		
<b>a. Primary</b>		SCRWRF  RPWRF	Fine screens, aerated grit collection, chemically enhanced primary treatment  Fine screens, aerated grit collection, chemically enhanced primary treatment																		
<b>b. Secondary</b>		SCRWRF  RPWRF	Step-feed nitrification/denitrification aeration basins combined with ultrafiltration membrane bioreactors (MBR), using ferric chloride addition for odor control and Phosphorus removal  Conventional activated sludge aeration basins, secondary clarifiers and seasonal alum addition for Phosphorus removal																		
<b>c. Tertiary</b>		SCRWRF RPWRF	MBR included with Secondary treatment process N/A																		
<b>8. Indicate methods of sludge disposal.</b> Note for 8.g.: SCRWRF sent Class B biosolids to Barr-Tech who treated to Class A compost.																					
Quantity of sludge					Quantity of sludge																
<b>a. Land application</b>		<input style="width: 80px;" type="text"/> dry tons/year	<b>e. Public distribution</b>		<input style="width: 80px;" type="text"/> dry tons/year																
<b>b. Incineration</b>		<input style="width: 80px;" type="text"/> dry tons/year	<b>f. Lagoon storage</b>		<input style="width: 80px;" type="text"/> dry tons/year																
<b>c. Monofill</b>		<input style="width: 80px;" type="text"/> dry tons/year	<b>g. Other (specify)</b>		<input style="width: 80px; text-align: center; border: 1px solid black;" type="text"/> 1689	dry tons/year															
<b>d. MSW landfill</b>		<input style="width: 80px;" type="text"/> dry tons/year																			
<b>D. APPLICATION OF STANDARDS</b>																					
If there is more than one treatment plant, were local limits established specifically for each plant?					<b>N/A</b>	<b>Yes</b>	<b>No</b>														
						Yes															



## PRETREATMENT PROGRAM PROFILE (Continued)

### E. ADDITIONAL INFORMATION

During 2013 the Spokane County Regional Water Reclamation Facility (SCRWRF) treated 2438.45 MG. The total wastewater flows for Spokane County's service area were 2578.18 MG for 2013. Hence 139.73 MG were treated at Riverside Park Water Reclamation Facility (RPWRF).

ATTACHMENT B COMPLETED BY: Stela Matei-Rowley, PE

DATE: 6/4/2014

TITLE: Pretreatment Engineer

TELEPHONE: (509) 477-7177

АТТАШМЕНТ С<sup>9</sup>

# WENDB DATA ENTRY WORKSHEET

## I. WENDB DATA ENTRY WORKSHEET

**INSTRUCTIONS:** Enter the data provided by the specific checklist questions that are referenced.

CA name SPOKANE COUNTY Division of Utilities

NPDES number WA 002473 & LAO 093317, STATE PERMIT: ST0008045

Date of inspection 6/27/14 & 7/23/2014

Date entered into PCS

	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.B.2.a	<u>8</u>
• Number of CIUs	CIUS	II.B.2.a	<u>6</u>
- Number of SIUs without control mechanism	NOCM	II.C.1.b	
- Number of SIUs not inspected or sampled	NOIN	II.E.2	
- Number of SIUs in SNC** with standards or reporting	PSNC	Att. A.B.4	<u>2</u>
- Number of SIUs in SNC with self-monitoring	MSNC	Att. A.B.4	
- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN	II.F.5	

\*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.

WENDB DATA ENTRY WORKSHEET

COMPLETED BY:

Scott Mallory

TITLE:

Pretreatment Engineer

DATE: 10/31/2014

TELEPHONE: 509-329-3473

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# RNC WORKSHEET

## II. RNC WORKSHEET

**INSTRUCTIONS:** Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.

CA name SPOKANE COUNTY Utilities

NPDES number WA 0093317, WA 0024473, STATE Permit No. ST0008045

Date of inspection 6/27/14 & 7/23/2014

Date entered into QNCR

	Level	Checklist Reference
<input type="radio"/> Failure to enforce against pass through and/or interference	I	II.F.6.b&9
<input type="radio"/> Failure to submit required reports within 30 days	I	Att. A.A.3
<input type="radio"/> Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
<input type="radio"/> Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
<input type="radio"/> Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
<input type="radio"/> Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
<input type="radio"/> Other (specify)	II	

### SNC

☐ CA in SNC for violation of any Level I criterion

☐ CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements.

SPOKANE COUNTY IS IN COMPLIANCE WITH THEIR PRETREATMENT PROGRAM  
Ecology RECOMMENDS THE FOLLOWING PRETREATMENT IMPROVEMENTS FOR SPOKANE COUNTY:

- ADD ELECTRONIC Reporting to SEWER USE ORDINANCE
- CONDUCT INDUSTRIAL USER SURVEY (IUS) FOR AT LEAST 20 PERCENT OF EXISTING INDUSTRIAL USERS EVERY YEAR. THIS WILL MEET YOUR REQUIREMENT TO SURVEY ALL INDUSTRIAL DISCHARGES EVERY 5 YEARS.
- IUS RESULTS/MATRIX:
  - SEPARATE OUT INDUSTRIAL USERS
    - NORTH VALLEY Interceptor
    - SOUTH VALLEY Interceptor

- NORTH SPOKANE Interceptor
- ADD RESTAURANTS, SCHOOLS, AND OTHER COMMERCIAL INDUSTRIES THAT MAY DISCHARGE FATS, OIL, AND GREASE (FOG)
- ADD DENTISTS, FLOWS, CHEMICALS, AND TREATMENT SYSTEMS (FOR EXAMPLE: SETTLING, GREASE TRAPS, AMALGAM TRAPS, AND PH NEUTRALIZATION)

RNC WORKSHEET COMPLETED BY: SCOTT MALLERY

TITLE: PRETREATMENT ENGINEER

DATE: 10/21/2014

TELEPHONE: 509-329-3473

3.

**PCI REFERENCE MATERIAL**

PUBLIC NOTICE OF  
SIGNIFICANT NONCOMPLIANCE  
SPOKANE COUNTY  
DIVISION OF UTILITIES  
Industrial Pretreatment Program

NOTICE: The company shown below had violations during the period January 1 to December 31, 2013 and was found in Significant Noncompliance (SNC) during the reporting period:

Company name: Kemira Water Solutions, 2315 N. Sullivan Rd., Spokane Valley, WA 99216

Nature of Violation/Type of Pollutant: Exceeded Selenium daily maximum limit for the month of June

Basis for Significant Noncompliance: Exceeded the Technical Review Criteria in one six-month evaluation period (for Selenium).

Penalty: Publication of this notice, written notice of SNC and additional sampling to ensure compliance with the Wastewater Discharge Permit conditions.

SR27450

\*Federal Tax ID No. 68-0617327

AFFIDAVIT OF PUBLICATION

STATE OF WASHINGTON  
County of Spokane} ss

Name:	Spokane County Utilities	Client ID:	22373
P.O. No.	SR27450	No. Lines:	33
Total Cost:	\$51.81	Order No:	151260

I, Joni L. Vincent

do solemnly swear that I am the Principal Clerk of *The Spokesman-Review*, a newspaper established and regularly published, once each day in the English language, in and of general circulation in the City of Spokane County, Washington; and in the City of Coeur d'Alene, Kootenai County, Idaho; that said newspaper has been so established and regularly published and has had said general circulation continuously for more than six (6) months prior to the 23rd day of July, 1941; that said newspaper is printed in an office maintained at its place of publication in the City of Spokane, Washington; that said newspaper was approved and designated as a legal newspaper by order of the Superior Court of the State of Washington for Spokane County on the 23rd day of July, 1941, and that said order has not been revoked and is in full force and effect; that the notice attached hereto and which is a part of the proof of publication, was published in said newspaper one time(s), the publication having been made once each time on the following dates:

March 5, 2014

That said notice was published in the regular and entire issue of every number of the paper during the period of time of publication, and that the notice was published in the newspaper proper and not in a supplement.

Subscribed and sworn to before me at the City of Spokane, this  
6th            day of March, 2014.

*Joni L. Vincent*



Notary Public in and for the State of Washington,  
residing at Spokane County, Washington

Notary Stamp

Spo Co Utilities Order # 151260 Mar 5.xls

PUBLIC NOTICE OF  
SIGNIFICANT NONCOMPLIANCE  
SPOKANE COUNTY  
DIVISION OF UTILITIES  
Industrial Pretreatment Program

\*Federal Tax ID No. 68-0617327

AFFIDAVIT OF PUBLICATION

STATE OF WASHINGTON  
County of Spokane} ss

NOTICE: The company shown below had violations during the period January 1 to December 31, 2013 and was found in Significant Noncompliance (SNC) during the reporting period;

Company name: Galaxy Compound Semiconductors, Inc., 9922 E Montgomery Avenue, Suite 7, Spokane Valley, WA 99206

Nature of Violation/Type of Pollutant: Exceeded Cadmium limit for the month of July.

Basis for Significant Noncompliance: Exceeded the Technical Review Criteria in one six-month evaluation period (for Cadmium).

Penalty: Publication of this notice, written notice of SNC.

SR27451

Name:	<u>Spokane County Utilities</u>	Client ID:	<u>22373</u>
P.O. No.	<u>SR27451</u>	No. Lines:	<u>30</u>
Total Cost:	<u>\$47.10</u>	Order No:	<u>151261</u>

I, Joni L. Vincent  
do solemnly swear that I am the Principal Clerk of ***The Spokesman-Review***, a newspaper established and regularly published, once each day in the English language, in and of general circulation in the City of Spokane County, Washington; and in the City of Coeur d'Alene, Kootenai County, Idaho; that said newspaper has been so established and regularly published and has had said general circulation continuously for more than six (6) months prior to the 23rd day of July, 1941; that said newspaper is printed in an office maintained at its place of publication in the City of Spokane, Washington; that said newspaper was approved and designated as a legal newspaper by order of the Superior Court of the State of Washington for Spokane County on the 23rd day of July, 1941, and that said order has not been revoked and is in full force and effect; that the notice attached hereto and which is a part of the proof of publication, was published in said newspaper one time(s), the publication having been made once each time on the following dates:

March 5, 2014

That said notice was published in the regular and entire issue of every number of the paper during the period of time of publication, and that the notice was published in the newspaper proper and not in a supplement.

Subscribed and sworn to before me at the City of Spokane, this  
6th day of March, 2014.

*Joni L. Vincent*

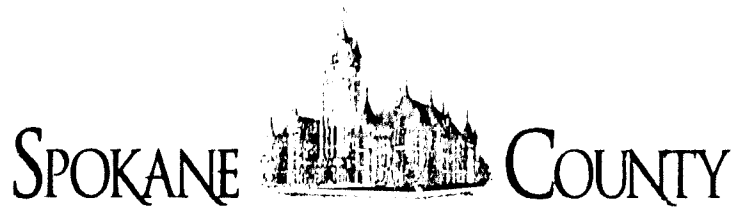


Notary Public in and for the State of Washington,  
residing at Spokane County, Washington

Notary Stamp

Spo Co Utilities Order # 151261 Mar 5.xls





UTILITIES DIVISION

KEVIN R. COOKE, P.E., DIRECTOR

A DIVISION OF THE PUBLIC WORKS DEPARTMENT

**Notice of Significant Noncompliance**

November 27, 2013

John Trevethan, Operations Manager  
Galaxy Compound Semiconductors  
9922 E. Montgomery, Suite #7  
Spokane Valley, WA 99206

Mr. Trevethan:

This letter is written to formally notify you that Spokane County has found an occurrence of Significant Noncompliance with your Wastewater Discharge Permit number SIU-3499-01-A, in an analysis of the six-month time interval from April 1 through September 30, 2013.

The definition of Significant Noncompliance (SNC) in Spokane County Code 8.03A.0801B.5.:

*"The term "significant noncompliance" means:*

*Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of Wastewater measurements taken for each Pollutant parameter during a rolling six (6) month period equal or exceed the product of the numeric Pretreatment Standard or Requirement, (including Instantaneous Limits, as referenced in Article 2), multiplied by the applicable criteria. Applicable criteria are 1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other Pollutants except pH. ["1.4" and "1.2" as used herein mean 140% or 120% respectively of applicable permit limits].*

Spokane County performs a rolling six month analysis at the end of each calendar quarter (example: from 4/1/13 through 9/30/13).

Your facility violated its Wastewater Discharge Permit, **Part I - Wastewater Discharge Limitations and Monitoring Requirements; Section B, 6 –Discharge limits.** As part of the annual pretreatment inspection County staff collected samples at your facility on July 31, 2013. The laboratory result for Cadmium at Suite 6&7 Etch shows a concentration of 0.145 mg/L. This exceeded the permit limit for Cadmium of 0.11 mg/L.

Three results are available for cadmium within the six-month time period (from 4/1/2013 through 9/30/2013). One result (the one sampled on 7/31/13) is higher than 1.2 times

the permitted limit or 33% of measurements are higher than 1.2 times the permitted limit. Therefore the wastewater measurements taken for Cadmium at Suite 6&7 Etch, during the six months period analysis are in Technical Review Criteria (TRC) Significant Noncompliance as stated in SCC 8.03A.0801.B.5. above.

Spokane County Code 8.03A.0801.A states:

*Publishing: The Director publishes annually a list of the Users which, at any time during the previous calendar year, were in significant noncompliance with applicable Pretreatment Standards and Requirements. The list is published in a newspaper of general circulation in Spokane County. Costs of publication will be billed to the Users.*

This Significant Noncompliance violation will be published in 2014.

**Corrective Action:**

Please analyze and eliminate or control any possible source for Cadmium throughout your facility in order to prevent similar noncompliance from occurring. If your facility continues to be out of compliance with parameters in its permit, such as Cadmium, the noncompliance will result in escalation of enforcement response.

**Deadline for Corrective Action**

Spokane County requires your response in writing, within **30 days** of the date of this notice, detailing how you plan to correct and prevent similar noncompliance from occurring. You also have to resample Cadmium to prove compliance with the Wastewater Discharge Permit.

*Failure to implement corrective actions as specified above will result in administrative penalties as provided in SCC 8.03A1401 Pretreatment Fees.*

This action may be appealed using procedures provided in SCC 8.03A.0904

**Administrative Appeals.**

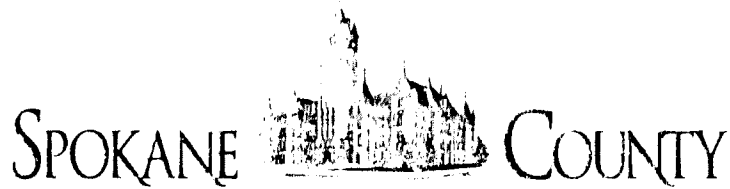
If you have questions or comments about the actions listed above, please contact me at 477-7177.

Sincerely,

A handwritten signature in black ink that reads "Stela Matei-Rowley" followed by a stylized flourish.

Stela Matei-Rowley, P.E.  
Pretreatment Engineer

C: Brian Ruchert, Galaxy Compound Semiconductors  
Anthony Benavidez, Pretreatment Specialist, CH2M Hill



## UTILITIES DIVISION

KEVIN R. COOKE, P.E., DIRECTOR  
A DIVISION OF THE PUBLIC WORKS DEPARTMENT

### **Notice of Significant Noncompliance**

August 1, 2013

Jane Bittle, Plant Manager  
Kemira Water Solutions  
2315 N Sullivan Rd.  
Spokane Valley, WA 99216

Ms. Bittle:

This letter is written to formally notify you that Spokane County has found an occurrence of Significant Noncompliance with your Wastewater Discharge Permit number SIU-2819-01, in an analysis of the six-month time interval from January 1 through June 30, 2013.

The definition of Significant Noncompliance (SNC) in Spokane County Code 8.03A.0801B:

*"The term "significant noncompliance" means:*

- 1. Any violation of a Pretreatment Standard or Requirement, including numerical limits, narrative Standards, and Prohibitions, that the Superintendent determines has caused, alone or in combination with other causes, Interference or Pass Through, or otherwise endangered the health of POTW personnel or the general public.*
- 2. Any Discharge of a Pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Superintendent's exercise of emergency authority to halt or prevent such a Discharge.*
- 3. Any violation(s), including of BMPs, which the Superintendent determines will adversely affect the operation or implementation of the local Pretreatment program.*
- 4. Chronic violations of Wastewater Discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same Pollutant parameter taken during a rolling six (6) month period exceed, by any magnitude, a numeric Pretreatment Standard or Requirement, including Instantaneous Limits.*
- 5. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of Wastewater measurements taken for each Pollutant parameter during a rolling six (6) month period equal or exceed the product of the numeric Pretreatment Standard or Requirement, (including Instantaneous Limits, as referenced in Article 2, multiplied by the applicable criteria. Applicable*

*criteria are 1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other Pollutants except pH. ["1.4" and "1.2" as used herein mean 140% or 120% respectively of applicable permit limits].*

6. *Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a Wastewater Discharge Permit or enforcement order for starting construction, completing construction, or attaining final compliance.*
7. *Failure to provide any required report within thirty (30) calendar days after the due date. This includes initial and periodic monitoring reports, and reports on initial compliance and on meeting compliance schedules.*
8. *Failure to accurately report noncompliance."*

Spokane County performs a rolling six month analysis at the end of each calendar quarter (example: from 1/1/13 through 6/30/13).

Your facility violated its Wastewater Discharge Permit, **Part I - Wastewater Discharge Limitations and Monitoring Requirements; Section B, 6 –Discharge limits**. Our records indicate your facility self-monitored and reported results for selenium that exceeded the permit limit of 1.7 mg/L. The reported concentration of the selenium sample collected on May 21, 2013 was 2.44 mg/L.

One result is available for selenium within the six-month time period (from 1/1/2013 through 6/30/2013) and it is higher than 1.2 times the permitted limit or 100% of measurements are higher than 1.2 times the permitted limit. Therefore the wastewater measurements taken for selenium during the six months period are in Technical Review Criteria Significant Noncompliance.

The 100% of selenium measurements qualifies as TRC Significant Noncompliance, because it is greater than 33% of all of the measurements as stated in SCC 8.03A.0801.B4 above.

Spokane County Code 8.03A.0801.A states:

*Publishing: The Director publishes annually a list of the Users which, at any time during the previous calendar year, were in significant noncompliance with applicable Pretreatment Standards and Requirements. The list is published in a newspaper of general circulation in Spokane County. Costs of publication will be billed to the Users.*

This Significant Noncompliance violation will be published in 2014.

#### **Corrective Action:**

Please analyze and eliminate or control any possible source for selenium throughout your facility in order to prevent similar noncompliance from occurring. If your facility continues to be out of compliance with parameters in its permit, such as selenium, the noncompliance will result in escalation of enforcement response.

#### **Deadline for Corrective Action**

Please submit within **30 days** of the date of this notice a plan that details the actions taken to correct and prevent this noncompliance. You also have to resample selenium to prove compliance with the Wastewater Discharge Permit.



*Failure to implement corrective actions as specified above will result in administrative penalties as provided in SCC 8.03A1401 Pretreatment Fees.*

This action may be appealed using procedures provided in SCC 8.03A.0904 **Administrative Appeals**.

If you have questions or comments about the actions listed above, please contact me at 477-7177.

Sincerely,

A handwritten signature in black ink that reads "Stela Matei-Rowley". The signature is written in a cursive, flowing style.

Stela Matei-Rowley, P.E.  
Pretreatment Engineer

cc: Dave Moss, P.E., Pretreatment Coordinator, Spokane County  
Randy Kueter, Pretreatment Specialist, CH2M Hill

6. Discharge limits: Derived from the Spokane County Local Discharge Limits, Spokane County Code 8.03A.0201 and 8.03A.0204.

<b>EFFLUENT CHARACTERISTICS</b>	<b>UNIT OF MEASUREMENT</b>	<b>DAILY MAXIMUM</b>
Arsenic	mg/L	0.41
Cadmium	mg/L	0.11
Chromium	mg/L	117
Copper	mg/L	1.9
Cyanides	mg/L	1.9
Lead	mg/L	0.32
Mercury	mg/L	0.05
Molybdenum	mg/L	1.5
Nickel	mg/L	3.98
Selenium	mg/L	1.7
Silver	mg/L	1.7
Zinc	mg/L	5.6
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	mg/L	Sum $\leq$ 1.4
TPH	mg/L	100

The Effluent Guidelines for the Landfill Category, 40 CFR Part 445, do not apply because this category does not contain Pretreatment Standards. The industry is a non-categorical Significant Industrial User. It is classified as such due to a process wastewater discharge greater than 25,000 gallons per day, as well as the potential to cause pass through or interference at the Publicly Owned Treatment Works.

7. The following self-monitoring requirements shall apply at the wet well at the northwest collection pond. The flow will be measured downstream at the Parshall Flume.

PARAMETER	ANALYTICAL METHOD (1)	SAMPLING FREQUENCY	TYPE OF SAMPLE
Flow (final effluent) (2)	Parshall Flume	Continuous	N/A
pH (2)	SM 4500-HB	Two events per week, when there is sufficient flow for measurement (2)	Grab
BTEX (3)	EPA 602 or 624	Two events per calendar year; in January and July	Four grabs per event
Priority Pollutants	EPA 602, 608, 624, 625, 200.7, 245.1, 335.4	Three per permit cycle 2011 (completed), 2013, 2015	Grab

Notes:

1. Methods for analysis must conform to those specified in 40 Code of Federal Regulations Part 136.
2. Flows and pH shall be reported on a monthly basis. When the sampling point for pH is not accessible due to inclement weather, the sampling frequency should be no less than four (4) events per month.
3. BTEX shall be sampled at least twice per calendar year (in January and July), by Permittee. Results for BTEX shall be reported as part of the February and August monthly reports. BTEX is the sum of five separate analyses results: Benzene, Ethylbenzene, Toluene, o-Xylene, and m+p-Xylene
  - a. If all five of the analyses are non-detect (ND), add up the five detection limits and report them as <sum (for example <0.400).
  - b. If one or more has a hit, report the sum of all five numbers as <sum.
  - c. If all five have hits, add all five together and report the sum.

The sum must be equal to or less than 1.4 mg/L. The County may increase the frequency of sampling based on the analytical results submitted

8. The following Spokane County monitoring requirements shall apply at the wet well at the northwest collection pond.

PARAMETER	ANALYTICAL METHOD (1)	SAMPLING FREQUENCY (2)	TYPE OF SAMPLE
pH	SM 4500-HB	Once per calendar year	Grab
BTEX	EPA 602 or 624	Once per calendar year	Four grabs per event

Notes:

1. Methods for analysis must conform to those specified in 40 Code of Federal Regulations Part 136.
2. Sampling performed by the Spokane County completed as part of the annual inspection program does not preclude any self-sampling requirements defined in this permit.

**C. DEFINITIONS**

1. The “monthly average” other than pH is the arithmetic mean of samples collected during a calendar month.
2. The “daily maximum” is defined as the greatest allowable value for any calendar day.
3. A “Grab” sample is an individual sample collected in less than 15 minutes, without regard for flow or time.

**D. SAMPLING FOR BTEX**

Four discrete grab samples shall be collected throughout the wastewater discharge day; with each aliquot being collected in a separate preserved 40 ml VOC vial. The User shall take special precautions to ensure that the sample vial contains no bubbles and that overfilling of the vial and washout of the preservative shall be prevented. The samples may be analyzed individually by the Lab and the four results averaged or the Lab, under controlled conditions, may composite the samples and conduct one analysis on the composite.

A 40 mL VOC bottle filled with helium or nitrogen purged DI water, with no bubbles, shall be prepared and shall accompany the other four sample bottles through every step of the sampling and storage procedure. This vial of purged DI water is called a “trip blank” and must be analyzed with the four discrete samples if the presence of a toxic organic is detected.

**Part II: REPORTING REQUIREMENTS**

**A. PRODUCTION INFORMATION AND PROCESS FLOWS [SCC 8.03A.0405]**

Emergency Notification: Spokane County Utilities (509) 477-1984,  
Spokane County Regional Water Reclamation Facility – (509) 536-3700 or (509) 979-4708  
City of Spokane RPWRF – (509) 625-4600, or (509) 625-4610



**SPOKANE COUNTY  
DIVISION OF UTILITIES  
WASTEWATER DISCHARGE PERMIT**

Company Name: Kemira Water Solutions  
Mailing Address: 2315 North Sullivan Road  
Spokane Valley, WA 99216  
Facility Address: 2315 North Sullivan Road  
Spokane Valley, WA 99216  
Phone Number: (509) 922-2244  
Signatory Authority: Jane D. Bittle, Plant Manager  
Facility Contact: Jane D. Bittle

The above Industrial User is authorized to discharge industrial wastewater to the Spokane County sewer system in compliance with the County's Ordinance, Spokane County Code (SCC) Chapter 8.03A, the current effective County Wastewater Rates and Regulations Resolution, pursuant to the provisions of the General Pretreatment Regulations (40 CFR, Part 403) of the Environmental Protection Agency under provisions of the Federal Water Pollution Control Act, also known as the Clean Water Act, 33 U.S.C. 1251 et seq. The applicable State of Washington regulations are State Waste Discharge Permit (WAC 173-216) under provisions of Revised Code of Washington (RCW 90.48). This wastewater discharge is approved in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the permit renewal application form filed on **April 16, 2010**, in the office of Spokane County, Division of Utilities, and in conformity with plans, specifications, and other data submitted to the City of Spokane. ~~The City~~ County Contractor will perform sampling and analyses and will coordinate inspections and assist the County to enforce the requirements of this permit. ~~The City~~ County will bill the cost of sampling and analyses to the permittee at the rates or fees established by County ordinance and the permittee will pay these costs within thirty days of the ~~City's~~ County's invoice. This permit shall expire no later than five years from the effective date, and is not transferable. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of SCC 8.03A.0313, a minimum of 180 days prior to the expiration date listed below.

Permit Fee: \$250.00  
Effective date: December 1, 2010  
Modified date: November 1, 2012  
Expiration date: November 30, 2015

N. Bruce Rawls 10-30-2012  
N. Bruce Rawls, Division of Utilities Director

**Emergency Notification:**  
Spokane County Utilities (509) 477-1984,  
City of Spokane RPWRF—(509) 625-4600, or (509) 625-4610 and  
Spokane County Regional Water Reclamation Facility-(509) 536-3700 or (509) 979-4708

### Part III: SPECIAL CONDITIONS

#### A. ACCIDENTAL SPILL PREVENTION PLAN [SCC 8.03A.0211]

The User is required to develop and implement an Accidental Spill Prevention Plan (ASPP), including any facilities or procedures ordered to support the same, all at the User's expense. The plan must be submitted to the County within ninety days **(by February 28, 2011.)** The User must implement the plans as approved by the Director. These requirements are cumulative with other requirements and not in the alternative.

The ASPP, developed by the User, shall address the following categories of management practices:

1. Prevention: The plan must include prevention practices (i.e. monitoring systems, non-destructive testing, labeling, covering or enclosing materials, equipment or process operations) and other techniques used to prevent material spills.
2. Containment: Containment practices used to contain or capture releases of materials within the industrial premises.
3. Mitigation: Mitigation practices for the cleanup and treatment of spill materials.
4. Ultimate Disposition: Practices for the proper disposal of spilled materials.
5. Education and Training: Education and training of staff on proper procedures. At a minimum posting phone numbers **(509) 477-1984 (Spokane County) and (509) 625-4600 (City of Spokane), or after hours (509) 625-4610 SCRWRP (509) 536-3700 or after hours (509) 979-4708.**

NOTES: 1. EPA Region 10's Guidance Manual for the Development of an Accidental Spill Prevention Program can be used as a guide in developing a Spill Prevention Plan.

#### B. OPERATION AND MAINTENANCE MANUAL [WAC 173-240-150]

A detailed Operation and Maintenance Manual must be prepared for an industrial wastewater facility that includes mechanical components. The manual is to be submitted to Washington State Department of Ecology for review and approval within ninety days **(by February 28, 2011).** The purpose of the manual is to present technical guidance and regulatory requirements to the operator to enhance operation under both normal and emergency conditions.

The Operation and Maintenance Manual shall include the following topics:

Emergency Notification:  
Spokane County Utilities (509) 477-1984, and  
~~City of Spokane RPWRF (509) 625-4600, or (509) 625-4610~~  
**Spokane County Regional Water Reclamation Facility-(509) 536-3700 or (509) 979-4708**  
Kemira Water Solutions

**FACT SHEET**  
**Wastewater Discharge Permit No. SIU-2819-01**  
**Facility Name: KEMIRA WATER SOLUTIONS**

## **SUMMARY**

An application for a Wastewater Discharge Permit renewal to discharge pollutants to the Spokane County sewage system was received on **April 16, 2010** from **Kemira Water Solutions**. This is in compliance with the provisions of the General Pretreatment Regulations, 40 Code of Federal Regulations (CFR) Part 403. These regulations are authorized by the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 United States Code 1251 et seq. This permit is also regulated by Washington State Waste Discharge Permit, Washington Administrative Code (WAC) 173-216, under provisions of Revised Code of Washington (RCW) 90.48. This application is also regulated by the Spokane County Code (SCC) regulating the facility's wastewater discharge by Chapter 8.03A, "Pretreatment," and specifically, the Local Discharge Limits, SCC 8.03A.0201, and 8.03A.0204.

Applicant Location:       Kemira Water Solutions  
                                  2315 North Sullivan Road  
                                  Spokane Valley, WA 99216

The Monthly Average Flow Limit is regulated not to exceed **42,000 gallons per production day**. Monthly Average Flow is to be calculated by summing all daily flows for the month, then dividing by the number of discharge days in the month.

Regulated flows are discharged via the North Valley Interceptor to Spokane County Regional Water Reclamation Facility and the City of Spokane Riverside Park Water Reclamation Facility (Publicly Owned Treatment Works or POTW).

Spokane County proposes to renew the permit to the above listed applicant allowing wastewater discharges subject to limitations. These limitations may require the installation of treatment facilities, schedules of compliance, and other conditions necessary to carry out the provisions of municipal, state, and federal law. The proposed limitations, schedules, and conditions are tentative.

## NON-ROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater, that is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for non-routine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Washington State Department of Ecology may authorize a direct discharge to the municipality, require the wastewater to be placed through the facilities wastewater treatment process or require the water to be reused. [SCC 8.03A.0407]

## ACCIDENTAL SPILL PREVENTION PLAN

The County has determined that the Permittee has the potential for a batch discharge or a spill that could adversely affect the POTW. Therefore a slug discharge control plan is required (40 CFR § 403.8 (f)). Part III.--A. "Accidental Spill Prevention Plan," outlines the categories of management practices to be covered. The plan must be updated to reflect any changes in the process and submitted to the County within 90 days of the effective date of this permit (**by February 28, 2011**) [SCC 8.03A.0211].

## OPERATIONS AND MAINTENANCE MANUAL

A detailed Operation and Maintenance Manual must be prepared by an industrial wastewater facility [WAC 173-240-150]. The purpose of the manual is to present technical guidance and regulatory requirements to the operator to enhance operation under both normal and emergency conditions. Part III.—B. "Operation and Maintenance Manual" outlines the topics to be covered. The manual is to be submitted to Washington State Department of Ecology for review and approval within ninety days, **February 28, 2011**.