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State of Washington Department of Ecology
Northwest Regional Office
WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

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

Transaction Code 1 <u>N</u> 2 <u>5</u>	NPDES # WA00001400	yr/mo/day 13/12/03 (December 3, 2013)	Inspection Type <u>P</u>	Inspector 19 <u>S</u>	Fac Type <u>1</u>
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Remarks

Inspection work days 67 _____ 69	Facility Self-Monitoring Evaluation Rating 70 <u>5</u>	BI 71 <u>N</u>	QA 72 <u>N</u>	Reserved 73 _____ 74 75 _____ 80
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Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Everett <u>WWTP</u> Industrial Wastewater Pretreatment Program 3200 Cedar Street Everett, WA 98201	Entry Time/Date 9:30AM December 3, 2013	Permit Effective Date September 1, 2009
	Exit Time / Date 3:00PM December 3, 2013	Permit Expiration Date October 1, 2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Kerwin (425) 257-8241 Gene Bennett (425) 257-8241	Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number. Jeff Kerwin Industrial Wastewater Pretreatment Program 3200 Cedar Street Everett, WA 98201 Phone Number (425) 257-8241 Fax _____ 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"/> Flow Measurement	<input type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Purpose of Inspection/Methodology

This inspection was conducted in order to evaluate the City of Everett's compliance with state and federal requirements related to administration of its delegated industrial wastewater pretreatment program. The inspection consisted of a review of industrial user permit files, including permits, inspection reports, self-monitoring reports, POTW sampling reports, slug discharge control plans, spill plans, and enforcement documents. The inspection also included interviews with pretreatment program inspectors and program managers.

File Review

The Department of Ecology Inspector reviewed two industrial user permittee files during this Pretreatment Compliance Inspection, those for Blue Streak Finishers, Ltd. and StockPot, Inc. Both of the permits were current and contained all the necessary provisions. The permit files were complete and contained the required number of control authority sampling records and inspection records. The City of Everett normally inspects and samples each significant industrial user at least two times per year.

StockPot, Inc. Compliance Status

The StockPot, Inc. permit file was reviewed to evaluate the adequacy of the City of Everett's enforcement actions for any violations, as well as to review the progress the industrial user's plant had made in coming into compliance with the pH standards in their permit. The City of Everett identified a flow violation which occurred during the applicable compliance period (The flow violation occurred in October 2013.). Issuance of a notice of violation was pending at the time of this

pretreatment compliance inspection (December 3, 2013.) The Department of Ecology inspector has determined this enforcement response to be adequate. Actions taken by the City of Everett have been successful in bringing this discharger back into compliance with pH standards.

Report Submitted on Measures Undertaken to Improve Enforcement Responses

The 2011 pretreatment compliance inspection report described a series of pH violations at StockPot, Inc. At the request of USEPA Region 10, the Department of Ecology inspector reviewed records of self monitoring reports by Stockpot Inc. for the period January 2009 through November 2011. The 2011 pretreatment compliance inspection report contained the inspector's determination that although the City of Everett's lack of timely enforcement did not meet the criteria for SNC (Significant Non-Compliance), it nevertheless indicated a deficiency in the program. The 2012 pretreatment compliance report contained a requirement that the City of Everett submit "a report to the Department of Ecology in which it has described the measures it has undertaken to ensure that timely and adequate enforcement responses are taken in the future. The City of Everett responded by sending a letter to the Department of Ecology, dated April 16, 2013, entitled "*Measures to Ensure Timely and Adequate Enforcement Response*". The letter contained the following steps:

- Purchased software from Linko Data Systems which synchronizes events in Linko compliance monitoring software with Microsoft Outlook calendars.
- Established interim internal deadlines for review of industrial user self-monitoring reports, and for completion of data entry into the compliance monitoring software
- Routed violation reports generated by the compliance monitoring software to management
- Management is now informed of all user violations by means of e-mail from the inspectors in order to track enforcement progress
- Internal deadlines have been established for completion of the initial drafts of Notices of Violation and other enforcement actions
- All violations will receive, at a minimum, the same initial response, which is a Notice of Violation.
- All pretreatment staff have reviewed the current Enforcement Response Plan and periodic reviews of that plan are being scheduled
- \$60 is the minimum penalty for a standards violation
- Penalties of \$30 per day are being levied for late reports

Additional measures being taken to improve the timeliness and magnitude of enforcement actions, are described in the section below entitled "*Review of Enforcement Response Plan Requested*".

Blue Streak Compliance Status

According to City of Everett pretreatment staff, Blue Streak's compliance has been good. The company has, however, received a penalty from the Department of Ecology Hazardous Waste and Toxics Reduction Unit for failure to perform a designation of a penetrant dye rinsewater discharge which the HWTR program felt had the potential to designate as *dangerous waste*. The HWTR Program made the determination following an April 2013 inspection. The Department of Ecology informed the City of Everett of the penalty shortly after it was issued. The City conducted an inspection after notification and did not identify any violations. The Department of Ecology's Water Quality Program's Doug Knutson is coordinating with the Department of Ecology's Hazardous Waste and Toxics Reduction Program staff to review the analytical results for the penetrant dye rinse wastewater. The results of the fish bioassay had not been completed at the time of the preparation of this pretreatment compliance inspection report.

Flow Transfer from City of Snohomish System Now Unlikely – Work on Interjurisdictional Agreement and Industrial User Survey Suspended

At the time of the previous (2012) Pretreatment Compliance Inspection, the City of Everett had anticipated that the City of Snohomish would initiate transfer of a portion of its flow to the City of Everett POTW for treatment. At this time it appears unlikely that this flow transfer will be initiated at any time in the next five years, if at all. Therefore, the City of Everett has discontinued its work on negotiating an interjurisdictional agreement to accommodate these flows.

Foss Shipyard Expected to Occupy a Portion of Former Kimberly Clark Site

Foss Shipyard currently conducts operations in Seattle. Foss Shipyard is expected to commence operations at the former Kimberly Clark plant in Everett in the near future. The City of Everett has obtained a copy of the permit issued to Foss by King County, and plans to use it to gain insight on possible impacts from the proposed operations at the Everett site.

Umbra Cucinetti Request for Re-Classification

Umbra Cucinetti recently moved into the City of Everett service area. The City of Everett classified this company as being subject to 40 CFR Part 433 metal finishing standards. The company has contacted the mayor to contest this classification. However, the company has not requested re-classification from the pretreatment program itself. At this time Umbra Cucinetti remains subject to the categorical standards set forth in 40 CFR Part 403.

JAMCO: Former Zero-Discharge Permit Begins Discharge

JAMCO, a former zero-discharge permit holder applied last year to the City of Everett for a permit modification to authorize the discharge of metal finishing wastewater and water jet cutting wastewater to the sanitary sewer. The City of Everett has issued the modified permit to Jamco. The City has determined that the discharge is subject to 40 CFR Part 433 standards.

Status of Boeing Plant Pretreatment System

The new pretreatment system installed at the Boeing Plant (in Building 45-08) approximately two years ago is still not functioning as required, due to a tendency of the wastewater to dissolve the membranes in the filters. The plant employs pH adjustment, filtration, and ozonation. The metal finishing wastewater is still being treated in Boeing's older conventional (chemically aided flocculation and settling) wastewater treatment system.

Review of Enforcement Response Plan Requested

I asked the City of Everett to evaluate its Enforcement Response Plan to ensure that it is in conformance with the requirements in 40 CFR Part 403.8(f)(5). The basic requirements as stated in this provision are that the Enforcement Response Plan must:

- *"Describe how the POTW will investigate instances of non compliance;*
- *Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of industrial user violations and time periods in which responses will take place;*
- *Identify by title the official(s) responsible for each type of response;*
- *Adequately reflect the POTW's primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8(f)(1) and (f)(2)."* (note this means requirements as detailed in the ordinance and the permits)

USEPA Region 10's pretreatment coordinator (Michael Le) has recently emphasized to the Department of Ecology, the importance of enforcement actions being of sufficient magnitude to provide a deterrent effect with respect to further violations. He has explained that this also means that there should be provision (and the City should make provisions in its enforcement response plan for the use of it) to levy penalties based on economic benefit. The Department of Ecology requests that the City of Everett review its Enforcement Response Plan to identify any areas in which the Plan is deficient with respect to the criteria named in 40 CFR Part 403.8(f)(5) (listed above), as well the additional deterrent and economic benefit criteria listed in this paragraph. The City of Everett should submit its evaluation, and a description of any proposed changes within six months of its receipt of this inspection report. The City should also include an evaluation of whether any of its proposed changes to the Enforcement Response Plan require changes in its ordinance to be implemented, and submit a description of proposed changes (if any are required) to the ordinance.

Industrial User Survey Procedures-Review Requested

The City of Everett described the following procedures which it uses to identify significant industrial users:

- Pretreatment program staff receive, and review, on a monthly basis, the list of new business licenses issued within the City.
- Pretreatment program staff receive significant preconstruction documents (e.g. SEPA notices, pre-permit application notifications, building permit applications, notifications of pre-permit meetings) and attend meetings between the City and project proponents as appropriate.
- Pretreatment program staff drive through business parks, industrial areas and other likely locations for new industrial dischargers, specifically to locate new industrial users. (Inspectors have found hot summer days to be ideal because doors are more likely to be rolled up.)
- The list of water users with flows greater than 25,000 gallons per year is reviewed.
- Staff remain vigilant during their inspection (typically two times per year) and sampling activities (typically two times per year) for identification of new or missed existing industrial users.
- Staff sample selected manholes and follow up stream as appropriate
- Pretreatment staff attend monthly Sewer User Group meetings with supervisors of technical services group representatives (e.g. backflow prevention inspectors, surface water engineering group, capital projects engineers).

During this inspection I emphasized the importance which USEPA Region 10 places on identifying significant industrial users in a timely manner. Therefore, I have asked the City of Everett to review and update as necessary, its industrial user survey procedures, and to submit the procedures to the Department of Ecology no later than six months after receipt of this pretreatment compliance inspection report.

Shin Nippon Biomedical Laboratories-Penalty Issued for pH Violations

The City of Everett identified seven brief (typically less than five minutes each) pH violations which occurred during the period of August 2013 through October 2013, which occurred at SNBL's (Shin Nippon Biomedical Laboratory's) research facility. The City took timely enforcement action against the discharger, by issuing a penalty of \$3000 and by issuing an administrative order requiring the company to develop and submit a proposed schedule, subject to City of Everett review, for engineering and installing a system designed to eliminate pH violations. The magnitude of the penalty and timeliness of The City of Everett's enforcement action were in marked contrast to those observed in the delayed enforcement action taken against StockPot, Inc. for pH violations which occurred approximately two years ago.

The pH non-compliance at SNBL was associated with malfunction of equipment designed to clean animal cages and adjust the pH of the cleaning water discharge. The low pH of the discharge apparently resulted from failure to properly neutralize UriSol, a urinal cleaning product more commonly employed in bathrooms located in commercial establishments. SNBL was originally classified by the City of Everett as an SIU (Significant Industrial User) based on the fact that SNBL had originally planned to discharge at a rate of greater than 25,000 gallons per day and had planned to discharge wastewater containing radioactive isotope tracers. Although the flow never reached 25,000 gallons per day and the discharge of the radioactive tracers never materialized, the City has retained its classification of the SNBL plant as an SIU. The City of Everett has been considering reclassification.

Boeing Site-Powder Mill Gulch-Groundwater Cleanup Site - Discharge of Airstrippe/Activated Carbon-Treated Wastewater (Designation as Significant Industrial User)

This cleanup site discharges approximately 4.3 million gallons per month. The previous pretreatment compliance inspection report noted that Michael Le of USEPA Region 10, had stated that this discharge should be classified as a Significant Industrial User. A review conducted during this pretreatment compliance inspection confirmed that this site has been classified as a *significant industrial user* by the City of Everett and has been issued a full permit as opposed to a discharge authorization.

Evaluation of Potential of Powder Mill Gulch Wastewater to Cause Pass-Through, Interference or Human Health Effects

The wastewater from this remediation project is treated by means of air stripping and activated carbon prior to discharge to the sanitary sewer. Michael Le (USEPA Region 10) has requested that the City of Everett evaluate the potential of the organic compounds present in the Powder Mill Gulch wastewater to cause interference, pass-through or other problems at the POTW. In response, the City of Everett's plant process engineer began the evaluation, first focusing on the main toxic organic compounds likely to be present in this effluent at detectable levels, specifically tetrachloroethene, cis-1,2-dichloroethene, and trichloroethene. The plant engineer determined that these compounds were consistently non-detectable in POTW plant influent at the 0.2 microgram per liter level. The POTW plant influent values are well below the 2.7 microgram per liter fresh water criterion for TCE (trichloroethene), the 0.8 micrograms per liter criterion for tetrachloroethene, and the 700 microgram per liter criterion for trans-1,2-dichloroethene which USEPA has established as National Recommended water Quality Criteria for Priority Pollutants as published in its Local Limits Guidance. I have listed the trans isomer criterion, above, for the dichloroethene species for purposes of comparison, as the USEPA list from the appendix does not include a recommended criterion for the cis isomer. The above standards are based on human health effects from consumption of both the water and organisms from the water.

In addition, his inspector (Doug Knutson) has reviewed human health-based "screening levels" as published in Appendix I to USEPA's local limit guidance document. The screening levels were developed based on Henry's Law calculations under the assumption of equilibrium conditions between phases and the application of human-health-based inhalation standards. The screening levels published in USEPA's local limits document are 0.026 mg/L for trichloroethylene and 0.945 mg/L for tetrachloroethylene. As Henry's law imputed health/inhalation-based screening levels were not available in Appendix I for cis-1,2 dichloroethene, this inspector estimated it using the nearest structural analogue which is trans-1,2-dichloroethene, which displays a screening level of 2.040 mg/L. I am asking the City of Everett to compare the screening levels with the assays in the discharge from the air stripping unit/activated carbon unit (as opposed to POTW plant influent). We can review the results during the pretreatment compliance inspection next year. However, review of these criteria may not be necessary at that time, as the Boeing Everett cleanup site anticipates that it will have received an NPDES permit under which it will be authorized to discharge directly to Powder Mill Gulch (also known as Powder Mill Creek).

Fluke Corporation's Evergreen Way Site Now Classified as Non-Significant Industrial User

Based on information provided by Fluke Corporation, and on findings of an inspection of Fluke Corporation's Evergreen Way site, the City of Everett concluded there were no longer any categorical processes being conducted at the site. In addition, the City of Everett concluded that the site no longer met any of the criteria for being classified as a significant industrial user, as there were no longer any industrial processes discharging to the sanitary sewer. The City of Everett notified Fluke Corporation of the cancellation of its permit on April 24, 2013.

Conclusion

The Department of Ecology has determined that the City of Everett is operating its pretreatment program in compliance with state and federal regulatory requirements. The timeliness and magnitude of the City's enforcement actions has greatly improved, as evidenced by recent enforcement actions against SNBL in response to recent pH non-compliance. The City of Everett has also taken the necessary enforcement action to bring StockPot, Inc. into compliance with pH standards. Nevertheless, the Department of Ecology has requested, in response to a USEPA Region 10 request, that the City of Everett review its Enforcement Response Plan and related provisions of its ordinance. The Department of Ecology has also requested the City of Everett to review and update as necessary, its Industrial User Survey procedures.

Name(s) and Signatures of Inspector(s) Doug Knutson <i>Doug Knutson</i>	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649-7025 3190 - 160th SE, Bellevue, WA 98008-5452	Date January 9 th , 2014
#		
Signature of Management Q.A Reviewer <i>Derald Shewey</i>	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date <i>Feb 18, 2014</i>

ANNOUNCED Inspection

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. (Use the Remarks columns to record 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., 94/06/30 = June 30, 1994).

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

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

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

C - Contractor or Other Inspectors (Specify in Remarks Columns)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

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

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 follow-up 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, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page <input checked="" type="checkbox"/> Section I <input checked="" type="checkbox"/> Section II <input type="checkbox"/> Section III <input type="checkbox"/> Attachment A <input type="checkbox"/> Attachment B <input type="checkbox"/> Attachment C Attachment D	IU File Evaluation Supplemental Data Review/Interview Evaluation and Summary Pretreatment Program Status Update Pretreatment Program Profile Worksheets <input type="checkbox"/> WENDB Data Entry Worksheet <input type="checkbox"/> RNC Worksheet <input type="checkbox"/> IU Site Visit Report Form (Optional) <input type="checkbox"/> File Review Worksheets (Optional) Supporting Documentation <hr/> <hr/> <hr/>
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CA name and address:
City of Everett
Industrial Wastewater Pretreatment Program
3200 Cedar Street
Everett, WA 98201

Date(s) of PCI
December 3rd, 2013

Period covered by PCI
October 1, 2012 - September 30, 2013

PIRT / DSS incorporated in NPDES permit?

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

INSPECTOR (S)

Name	Title/Affiliation	Telephone Number
Doug Knutson	Environmental Engineer - Washington State Department of Ecology	(425) 649-7025

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Jeff Kerwin	Industrial Pretreatment Program Manager	(425) 257-8241
Gene Bennett	Industrial Waste Inspector	(425) 257-8240

*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 average
gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	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 SIU 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			
FILE <u>7917</u> Industry name and address Blue Streak Finishes, Ltd. 1520 - 80th street SW Building A Everett, WA 98203	Total flow (gpd) 10,000	Process flow (gpd) 3500	
		Type of industry (products manufactured) Anodizing, color coating, non-destructive testing	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category 40CFR Part 433.17	Compliance status <input type="checkbox"/> SNC (period: _____) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

FILE <u>7703</u> Industry name and address StackPot, Inc. 1505 Industry Street Everett, WA 98203		Total flow (gpd) 400,000	Process flow (gpd) 350,000
		Type of industry (products manufactured) Manufacturer of soup	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category N/A	Compliance status <input type="checkbox"/> SNC (period: _____) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments Notice of violation issued for flow violation which occurred on October 4, 2013 (not SNC)			

NARRATIVE COMMENTS

FILE _____ Industry name and address		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			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

FILE _____ Industry name and address	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

NARRATIVE COMMENTS

FILE _____ Industry name and address	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

SECTION I: IU EVALUATION (Continued)

Industry Name					<i>INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.</i>	
File	File	File	File	File		
7917	7303	___	___	___		
IU FILE REVIEW					Reg. Cite	
A. CA NOTIFICATION OF IU						
OK	OK				1. Notification of classification or change in classification	403.8(f)(2)(iii)
OK	OK				2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
Comments ① 433.17 (AD CFR) ② SIU by virtue of flow, non-categorical						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7717	7703				B. ISSUANCE OF IU CONTROL MECHANISM	
OK ¹	OK ²				1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
OK ³	OK ⁴				2. Control mechanism contents	403.8(f)(1)(iii)
OK	OK				a. Statement of duration (≤ 5 years)	
OK	OK				b. Statement of nontransferability	
OK	OK				c. Applicable effluent limits (local limits, categorical standards)	
OK ⁵	OK ⁶				d. Self monitoring requirements	
OK ⁷	OK ⁸				• Identification of pollutants to be monitored	
OK ⁹	OK ¹⁰				• Sampling frequency	
OK ¹¹	OK ¹²				• Sampling locations/discharge points	
DL	OK				• Sample types (grab or composite)	
OK ¹³	OK				• Reporting requirements	
OK ¹⁴	OK				• Record-keeping requirements	
OK ¹⁵	OK				e. Statement of applicable civil and criminal penalties	
OK ¹⁶	OK ¹⁷				f. Compliance schedules	
OK	OK				g. Notice of slug loading	
OK ¹⁸	OK ¹⁹				h. Notification of spills, bypasses, upsets, etc.	
OK	OK				i. Notification of significant change in discharge	
OK ²⁰	OK				j. 24-hour notification of violation/resample requirement	
OK ²¹	OK ²²				k. Slug discharge control plan requirement	
<p>Comments</p> <p>① March 31, 2010 - March 30, 2015</p> <p>② Most stringent of local limits & 40CFR Part 433.17</p> <p>③ Monthly</p> <p>④ Weir box in discharge line.</p> <p>⑤ Composite (except EN, TTD, FDG)</p> <p>⑥ No compliance schedule</p> <p>⑦ Accidental Spill Prevention Plan which City of Everett has determined to be effective for Slug Control Plan purposes.</p> <p>⑧ July 1, 2011 - June 30, 2016</p> <p>⑨ 2/month for metals, pH continuous, BODs 2/week</p> <p>⑩ Flare in monitoring hole</p> <p>⑪ composite except pH, FDG, closed up flash point</p> <p>⑫ Complied with compliance schedule ending August 31, 2012.</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7919	7908				C. CA APPLICATION OF IU PRETREATMENT STANDRDS	
OK	OK				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)
					4. Calculation and application of production based-standards	403.6(c)
					5. Calculation and application of CWF or FWA	403.6(d)&(e)
					6. Application of most stringent limit	403.8(f)(1)(ii)
OK	N/A					
OK	N/A					
DK	N/A					
OK	OK					
N/A	N/A					
N/A	N/A					
OK	OK					
Comments ① AOCFR Part 433.17						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	403.8(f)(2)(v)
OK	OK				1. Sampling (once a year)	
OK	OK				2. Sampling at frequency specified in approved program	403.8(f)(2)(vi)
OK	OK				3. Documentation of sampling activities	
OK	OK				4. Analysis for all regulated parameters	403.8(f)(2)(vi)
OK	OK				5. Appropriate analytical methods (40 CFR Part 136)	
					Inspection	403.8(f)(2)(v)
OK	OK				6. Inspection (once a year)	
OK	OK				7. Inspection at frequency specified in approved program	403.8(f)(2)(vi)
OK	OK				8. Documentation of inspection activities	403.8(f)(2)(v)
OK	OK				9. Evaluation of need for slug discharge control plan	
<p>Comments</p> <p>① November 1, 2013, April 8, 2013</p> <p>② includes evaluation of slug control plan.</p> <p>③ 05/10/2013, 10/31/2013</p> <p>④ 08/09/2013, 10/23/2013</p> <p>⑤ 11/13/2013, 5/07/2013</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7717	7703	---	---	---	E. CA ENFORCEMENT ACTIVITIES	
OK	OK ¹				1. Identification of violations	403.8(f)(2)(vi)
OK	OK				a. Discharge violations	
OK	OK				b. Monitoring/reporting violations	
OK	OK				c. Compliance schedule violations	
OK	OK ²				2. Calculation of SNC	403.8(f)(2)(vi)
OK	OK				3. Adherence to approved ERP	403.8(f)(5)
OK	OK				4. Escalation of enforcement	403.8(f)(5)
OK	OK ²				5. Publication for SNC	403.8(f)(2)(vi)
<p>Comments</p> <p>① One flow discharge violation - October 2013, Notice of Violation Pending</p> <p>② No SNC (not in SNC)</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
777	7703				F. IU COMPLIANCE STATUS	
OK	OK				Self-Monitoring and Reporting	
OK	OK				1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h) 403.12(g)(1)&(h)
OK	OK				2. Analysis of all required pollutants	403.12(b) &(d)
OK	OK				3. Submission of BMR/90-day report	403.12(e)&(h)
OK	OK				4. Periodic self monitoring reports	403.12(g)(1)&(h)
OK	OK				5. Reporting all required pollutants	403.12(i)
OK	OK				6. Signatory/certification of reports	403.12(c)
OK	OK				7. Submission of compliance schedule reports by required dates	403.12(g)(2)
OK	OK				8. Notification within 24-hours of becoming aware of violations	
					• Discharge violation	
					• Slug load	
					• Accidental spill	403.12(g)(2)
					9. Resampling/reporting within 30 days of knowledge of violation	403.12(j)&(p)
					10. Notification of hazardous waste discharge	403.8(f)(2)(v)
					11. Submission/implementation of slug discharge control plan	403.12(j)
					12. Notification of significant changes	
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
OK	X				Discharge	
					13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
					a. Chronic violations	
					b. TRC	403.5(a)(1)
					c. Pass through or interference	403.12(f)
					• Spill or slug load	
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
<p>Comments</p> <p>① compliance schedule reports required.</p> <p>② no violations 15/4g discharges/spills</p> <p>③ no hazardous waste discharge</p> <p>④ submitted as Accidental Spill Discharge Control Plan - City evaluated to be consistent 5kg Discharge Control Plan requirements.</p> <p>⑤ one flow violation, October 4, 2012</p> <p>⑥ flow monitored continuously - Notice of Violation for flow violation pending</p> <p>⑦ N, hazardous waste discharge</p>						

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.

In the process of reviewing both oil & grease & pretreatment ordinances.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

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)(i)]

Update of the industrial user inventory is a continuous process based on the following activities and procedures:

- Program staff receive and review, on a monthly basis, a list of new business licenses issued within the City.
- Program staff receive significant preconstruction documents related to building permits (e.g. SEPA Notices/Worksheets, prepermit application notifications, building permit applications, notifications of pre-permit meetings) and attend meetings between building permitting projects and project proponents.
- Staff drive around business parks, industrial areas, and other locations to reconnoiter with the specific goal of identifying new or hitherto unidentified industrial users.
- Staff remain vigilant during their travels associated with inspections (at least two times per year per industrial user) and sampling visits (at least two times per year per industrial user) for identification of industrial users.
- Sampling of selected manholes, following evidence upstream as appropriate.
- Attend monthly meetings with various City technical service group representatives (e.g. backflow prevention inspectors, surface water engineering group, capital projects, etc.)
- Complaints lodged by competitors/disgruntled etc.

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

a.	21	SIUs (as defined by the CA) [WENDB - SIUS]
	10	CIUs (including zero-discharging CIUs)[WENDB - CIUS]
	2	Zero-discharging CIUs
	11	Noncategorical SIUs (including zero-discharging noncat. SIUs)
	0	Zero-discharger noncategorical SIUs
b.	12	Other regulated noncategorical IUs (specify) (mainly short term dewatering)
c.	33	TOTAL

(and one NSCIU)

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

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

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

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]

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)(vi)] 0

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

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		

trucked or hauled waste prohibited

If yes, identify the industries.

If no, explain.

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. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. Identify the following.

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs		2yr*	
• Other SIUs		2yr*	
b. Sampling (by CA)			
• CIUs		2yr*	
• Other SIUs		2yr*	
c. Self - Monitoring			
• CIUs		monthly**	
• Other SIUs		monthly**	
d. Reporting			
• CIUs		monthly**	
• Other SIUs		monthly**	

2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [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

0	0	%
0	0	%
0	0	%

If any, explain.

* Except for non-discharging SIUs & non-discharging CIUs and non significant categorical industrial users. (All of the three latter receive one inspection per year and one sample per year for non-significant categorical industrial user.)

* several quarterly sampling schedule

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

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

N/A	Yes	No
	X	
	X	
	X	
		X
	X	
		X
		X
		X
		X
		X
		X

- 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 services
- j. Other (specify)

Explain if appropriate

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

N/A	Yes	No
	X	

3. 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 inspection.

SNC Evaluation Period October 1, 2012 - September 30, 2013

0	0	%
0	0	%
0	0	%

- Applicable pretreatment standards and reporting requirements
- Self - monitoring requirements
- Pretreatment compliance schedules

*SNC defined by:

POTW	✓
EPA	✓

3a. Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?

Evaluation Period: October 1, 2012 - September 30, 2013

Number of SIUs: 10

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules? *SNBL has been ordered to submit compliance schedule, but is not on it yet.*
Stock has achieved compliance by August 2012. (outside of period covered in OTHUS PCT)

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

SIU	End Date

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

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

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

- a. Within 90 days
- b. Within the time specified in the ERP
- c. Through a compliance schedule component (including legal authority, local limits, DSS requirements, etc.)?

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

G. ADDITIONAL EVALUATIONS

SECTION II COMPLETED BY: <i>Doug Knutson</i>	DATE: <i>December 26th 2013</i>
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POTW REPRESENTATIVE PROVIDING RESPONSES:	DATE:
	TELEPHONE: