



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<br>1 <u>N</u> 2 <u>5</u> | NPDES #<br><del>WA00001400</del> | yr/mo/day<br><b>13/12/03</b><br>(December 3, 2013) | Inspection Type<br><u>P</u> | Inspector<br>19 <u>S</u> | Fac Type<br><u>1</u> |
|---|----------------------------------|--|-----------------------------|--------------------------|----------------------|

Remarks

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

Section B: Facility Data

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

|  |                     |
|--|---------------------|
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)<br>Jeff Kerwin (425) 257-8241<br>Gene Bennett (425) 257-8241   | Other Facility Data |
| Name, Address of Responsible Official/Title/Phone and Fax Number.<br>Jeff Kerwin<br>Industrial Wastewater Pretreatment Program<br>3200 Cedar Street<br>Everett, WA 98201<br>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.

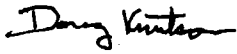

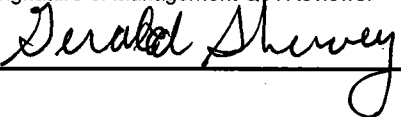

In addition, his inspector (Doug Knutson) has reviewed human health-based "screening levels" as published in Appendix I to USEPA's local limit guidance document. The screening levels were developed based on Henry's Law calculations under the assumption of equilibrium conditions between phases and the 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)<br>Doug Knutson<br> | Agency/Office/Telephone<br>WA Dept. of Ecology/NWRO/(425)649-7025<br><br>3190 - 160th SE, Bellevue, WA 98008-5452 | Date<br>January 9 <sup>th</sup> ,<br>2014  |
|   |   |  |
| Signature of Management Q.A. Reviewer<br>                   | Agency/Office/Phone and Fax Numbers<br>WA Dept. of Ecology/NWRO/(425)649-7000<br>fax (425)649-7098                | Date<br> Feb 18, 2014 |

**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 <i>(Specify in Remarks Columns)</i> | 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                                     | IU File Evaluation  |
| <input checked="" type="checkbox"/> Section I  | Supplemental Data Review/Interview                            |
| <input checked="" type="checkbox"/> Section II | Evaluation and Summary  |
| <input type="checkbox"/> Section III           |   |
| <input type="checkbox"/> Attachment A          | Pretreatment Program Status Update                            |
| <input type="checkbox"/> Attachment B          | Pretreatment Program Profile Worksheets                       |
| <input type="checkbox"/> Attachment C          | <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)    |
| Attachment D                                   | Supporting Documentation                                      |

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

### 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

BMR  
CA  
CFR  
CIU  
CSO  
CWA  
CWF  
DSS  
EP  
EPA  
ERP  
FTE  
FWA  
gpd  
IU  
IWS  
MGD  
MSW  
NA  
N/D  
NPDES  
O&G  
PIRT  
POTW  
RCRA  
RNC  
SIU  
SNC  
TCLP  
TRC  
TTO  
WENDB

## Term

Baseline Monitoring Report  
Control Authority  
Code of Federal Regulations  
Categorical industrial user  
Combined sewer overflow  
Clean Water Act  
Combined wastestream formula  
Domestic Sewage Study  
Extraction Procedure  
U.S. Environmental Protection Agency  
Enforcement response plan  
Full-time equivalent  
Flow-weighted average  
Gallons per day  
Industrial user  
Industrial waste survey  
Million gallons per day  
Municipal solid waste  
Not applicable  
Not determined  
National Pollutant Discharge Elimination System  
Oil and grease  
Pretreatment Implementation Review Task Force  
Publicly owned treatment works  
Resource Conservation and Recovery Act  
Reportable noncompliance  
Significant industrial user  
Significant noncompliance  
Toxicity Characteristic Leachate Procedure  
Technical review criteria  
Total toxic organics  
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>3917</u> Industry name and address<br>Blue Streak Finishes Ltd.<br>1520 - 80th Street SW<br>Building A<br>Everett, WA 98203 | Total flow (gpd)<br>10,000                       | Process flow (gpd)<br>3500   |  |
|   |  | Type of industry (products manufactured)<br>Anodizing, color coating, non-destructive testing  |  |
| Industry visited during PCI<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                                  | Applicable Federal category<br>40CFR Part 433.17 | Compliance status <input type="checkbox"/> SNC (period: _____)<br><input checked="" type="checkbox"/> Noncompliance/corrected<br><input type="checkbox"/> Noncompliance/continuing |  |
| Comments  |  |  |  |

# SECTION I: IU FILE EVALUATION (Continued)

## NARRATIVE COMMENTS

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

## NARRATIVE COMMENTS

|   |                             |   |                    |
|---|-----------------------------|---|--------------------|
| FILE _____ Industry name and address  |                             | Total flow (gpd)  | Process flow (gpd) |
|   |                             | Type of industry (products manufactured)  |                    |
| Industry visited during PCI<br>Yes <input type="checkbox"/> No <input type="checkbox"/> | Applicable Federal category | Compliance status <input type="checkbox"/> SNC (period: _____)<br><input type="checkbox"/> Noncompliance/corrected<br><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<br><br>Yes <input type="checkbox"/> No <input type="checkbox"/> | Applicable Federal category | Compliance status <input type="checkbox"/> SNC (period: _____ )<br><input type="checkbox"/> Noncompliance/corrected<br><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<br><br>Yes <input type="checkbox"/> No <input type="checkbox"/> | Applicable Federal category | Compliance status <input type="checkbox"/> SNC (period: _____ )<br><input type="checkbox"/> Noncompliance/corrected<br><input type="checkbox"/> Noncompliance/continuing |

Comments

## SECTION I: IU EVALUATION (Continued)

|  |      |      |      |      |  |                      |
|--|------|------|------|------|--|----------------------|
| Industry Name  |      |      |      |      | <p><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></p> |                      |
| File   | File | File | File | File |  |                      |
| 7917   | 7303 | —    | —    | —    | <b>IU FILE REVIEW</b>  | <b>Reg.<br/>Cite</b> |
| OKO  | OKO  | OKO  | OKO  | OKO  |  |                      |
| A. CA NOTIFICATION OF IU   |      |      |      |      |  |                      |
| 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> <p>① 433.17 (40 CFR)</p> <p>② SIU by virtue of flow, non-categories!</p> |      |      |      |      |  |                      |

# SECTION I: IU EVALUATION (Continued)

| File  | File | File | File | File | IU FILE REVIEW  | Reg. Cite        |
|---|------|------|------|------|---|------------------|
| 7703  | 7703 |      |      |      | <b>B. ISSUANCE OF IU CONTROL MECHANISM</b>                          |                  |
| OK  | OK   |      |      |      | 1. Issuance or reissuance of control mechanism                      | 403.8(f)(1)(iii) |
| OK  | OK   |      |      |      | 2. Control mechanism contents                                       | 403.8(f)(1)(iii) |
| OK  | OK   |      |      |      | a. Statement of duration ( $\leq 5$ years)                          |                  |
| OK  | OK   |      |      |      | b. Statement of nontransferability                                  |                  |
| OK  | OK   |      |      |      | c. Applicable effluent limits (local limits, categorical standards) |                  |
|   |      |      |      |      | d. Self monitoring requirements -                                   |                  |
|   |      |      |      |      | • 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             |                  |
|   |      |      |      |      | 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           |                  |
|   |      |      |      |      | 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 &amp; 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 cup 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 |      |      |      | <b>C. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>        |                                  |
| OK                              | OK   |      |      |      | 1. IU categorization   | 403.8(f)(1)(ii)                  |
|                                 |      |      |      |      | 2. Calculation and application of categorical standards      | 403.8(f)(1)(ii)                  |
| OK                              | N/A  |      |      |      | a. Classification by category/subcategory                    |                                  |
| OK                              | N/A  |      |      |      | b. Classification as new/existing source                     |                                  |
| OK                              | N/A  |      |      |      | c. Application of limits for all regulated pollutants        |                                  |
| OK                              | OK   |      |      |      | 3. Application of local limits                               | 403.5(c)&(d)&<br>403.8(f)(1)(ii) |
| N/A                             | N/A  |      |      |      | 4. Calculation and application of production based-standards | 403.6(c)                         |
| N/A                             | N/A  |      |      |      | 5. Calculation and application of CWF or FWA                 | 403.6(d)&(e)                     |
| OK                              | OK   |      |      |      | 6. Application of most stringent limit                       | 403.8(f)(1)(ii)                  |
| Comments<br>① AOCFR Part 433.17 |      |      |      |      |  |                                  |

# SECTION I: IU EVALUATION (Continued)

| File   | File | File | File | File | IU FILE REVIEW   | Reg. Cite       |
|--|------|------|------|------|--|-----------------|
| 1717   | 7703 |      |      |      | <b>D. CA COMPLIANCE MONITORING</b>                       |                 |
| OK   | OK   |      |      |      | 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    |                 |
| Comments<br>① November 1, 2013, April 8, 2013<br>② include evaluation of slug control plan.<br>③ 05/10/2013, 10/31/2013<br>④ 05/09/2013, 10/23/2013<br>⑤ 11/13/2013, 5/07/2013 |      |      |      |      |  |                 |

## SECTION I: IU EVALUATION (Continued)

| File  | File | File | File | File | IU FILE REVIEW                      | Reg. Cite       |
|---|------|------|------|------|-------------------------------------|-----------------|
| 7717  | 7703 |      |      |      | <b>E. CA ENFORCEMENT ACTIVITIES</b> |                 |
| OK  | OK   |      |      |      | 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. 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   |      |      |      | 5. Publication for SNC              | 403.8(f)(2)(vi) |
| Comments<br>① One flow discharge violation - October 2013, Notice of Violation Pending<br>② No SNC (not in SNC) |      |      |      |      |                                     |                 |



# SECTION I: IU EVALUATION (Continued)

| File  | File | File | File | File | IU FILE REVIEW   | Reg. Cite        |
|---|------|------|------|------|--|------------------|
| 777   | 770  |      |      |      | <b>F. IU COMPLIANCE STATUS</b>                                     |                  |
| OK  | OK   |      |      |      | Self-Monitoring and Reporting                                      |                  |
| OK  | OK   |      |      |      | 1. Sampling at frequency specified in control mechanism/regulation | 403.12(e)&(h)    |
| OK  | OK   |      |      |      | 2. Analysis of all required pollutants                             | 403.12(g)(1)&(h) |
| OK  | OK   |      |      |      | 3. Submission of BMR/90-day report                                 | 403.12(b) &(d)   |
| OK  | OK   |      |      |      | 4. Periodic self monitoring reports                                | 403.12(e)&(h)    |
| OK  | OK   |      |      |      | 5. Reporting all required pollutants                               | 403.12(g)(1)&(h) |
| OK  | OK   |      |      |      | 6. Signatory/certification of reports                              | 403.12(i)        |
| OK  | OK   |      |      |      | 7. Submission of compliance schedule reports by required dates     | 403.12(c)        |
| OK  | OK   |      |      |      | 8. Notification within 24-hours of becoming aware of violations    | 403.12(g)(2)     |
| OK  | OK   |      |      |      | • Discharge violation  |                  |
| OK  | OK   |      |      |      | • Slug load  |                  |
| OK  | OK   |      |      |      | • Accidental spill   | 403.12(g)(2)     |
| OK  | OK   |      |      |      | 9. Resampling/reporting within 30 days of knowledge of violation   | 403.12(j)&(p)    |
| OK  | OK   |      |      |      | 10. Notification of hazardous waste discharge                      | 403.8(f)(2)(v)   |
| OK  | OK   |      |      |      | 11. Submission/implementation of slug discharge control plan       | 403.12(j)        |
| OK  | OK   |      |      |      | 12. Notification of significant changes                            |                  |
| DIS   | OK   |      |      |      |  |                  |
| <b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.</b>  |      |      |      |      |  |                  |
| OK  | OK   |      |      |      | <b>Discharge</b>   |                  |
| OK  | OK   |      |      |      | 13. Noncompliance with discharge limits (but not SNC)              | 403.8(f)(2)(vii) |
| OK  | OK   |      |      |      | 14. SNC  |                  |
| OK  | OK   |      |      |      | a. Chronic violations  |                  |
| OK  | OK   |      |      |      | b. TRC   | 403.5(a)(1)      |
| OK  | OK   |      |      |      | c. Pass through or interference                                    | 403.12(f)        |
| OK  | OK   |      |      |      | • Spill or slug load   |                  |
| OK  | OK   |      |      |      | d. Other discharge violations (specify)                            |                  |
| OK  | OK   |      |      |      | <b>Reporting</b>   |                  |
| OK  | OK   |      |      |      | 15. Noncompliance with reporting requirements (but not SNC)        | 403.8(f)(2)(vii) |
| OK  | OK   |      |      |      | 16. SNC with reporting requirements                                | 403.8(f)(2)(vii) |
| <b>Comments</b><br>① compliance schedule reports required.<br>② no violations / 15 / 4g discharges / spills<br>③ no hazardous waste discharge<br>④ submitted as Accidental Spill Discharge Control Plan - City evaluated to be consistent 5kg Discharge Control Plan requirements.<br>⑤ one flow violation, October 4, 2012<br>⑥ flow monitored continuously - Notice of Violation for flow violation pending<br>⑦ N, hazardous waste discharge |      |      |      |      |  |                  |

## SECTION I: IU EVALUATION (Continued)

| File     | File | File | File | File | IU FILE REVIEW  | Reg.<br>Cite |
|----------|------|------|------|------|-----------------|--------------|
|          |      |      |      |      | <b>G. OTHER</b> |              |
|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
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|          |      |      |      |      |                 |              |
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|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
|          |      |      |      |      |                 |              |
| Comments |      |      |      |      |                 |              |

|   |   |
|---|---|
| SECTION I COMPLETED BY: <u>Doug Knutson</u><br>TITLE: <u>Environmental Engineer</u> | DATE: <u>December 26<sup>th</sup>, 2003</u><br>TELEPHONE: <u>425 649 7025</u> |
|---|---|

## 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/Workbooks, 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. | <div style="border: 1px solid black; padding: 2px; display: inline-block;">21</div> | SIUs (as defined by the CA) [WENDB - SIUS]   |
|    | <div style="border: 1px solid black; padding: 2px; display: inline-block;">10</div> | CIUs (including zero-discharging CIUs)[WENDB - CIUS]                               |
|    | <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div>  | Zero-discharging CIUs  |
|    | <div style="border: 1px solid black; padding: 2px; display: inline-block;">11</div> | Noncategorical SIUs (including zero-discharging noncat. SIUs)                      |
|    | <div style="border: 1px solid black; padding: 2px; display: inline-block;">0</div>  | Zero-discharger noncategorical SIUs  |
| b. | <div style="border: 1px solid black; padding: 2px; display: inline-block;">12</div> | Other regulated noncategorical IUs (specify) <i>(mainly short term dewatering)</i> |
| c. | <div style="border: 1px solid black; padding: 2px; display: inline-block;">33</div> | 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 ? 21

b. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism ? [WENDB - NOCM] [RNC - II] 0 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)(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]

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

- 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)

| N/A | Yes | No |
|-----|-----|----|
|     | X   |    |
|     | X   |    |
|     | X   |    |
|     |     | X  |
|     | X   |    |
|     |     | X  |
|     |     | X  |
|     |     | X  |
|     |     | X  |
|     |     |    |

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)

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

*N/A - no dischargers classified as SNC*

Yes

No

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 - SINN]

0

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 obstruction
- 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  |     |         |

\* Obstruction of lines occurred due to oil & grease from restaurants and dense residential developments.

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

Yes

No

## 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.*  
*Start by 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: *Doug Knutson*  
 TITLE: *Environmental Engineer*

POTW REPRESENTATIVE  
 PROVIDING RESPONSES:

DATE: *December 26th 2013*  
 TELEPHONE: *(425) 649-7025*  
 DATE:   
 TELEPHONE: