AMENDED (6.1

-	State of Washington Depail Northwest Region WATER COMPLIANCE INS	-	substitute for OMB No. 2040- 0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)					
	Section A: National Data Sy	ystem Co	ding (i.e., PC	,S)				
Transaction Code	NPDES #	yr	r/mo/day	Inspe	ection Type	In	spector	Fac Type
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	WA-0024490		ecember ¹ , 2011)					
	Remar		,,					,
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POTW name and NPI	DES permit number)		ļ	1		. !		. ast
,			J	9:30AM/December September 1 st , 2011 2009			•	
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City of Everett			1	Exit Time		I		xpiration Date
l e	vater Pretreatment Program		1		M/Decembe	er	Octobe	er 1 st , 2015
3200 Cedar Stree			. 1	6 th , 201	.1	ľ		
Everett, WA 9820	<i>1</i> 1		1	i		1	l	
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Name (a) of On Cita D	(All the control of t			L De				
Name(s) of On-Site Ri	Representative(s)/Title(s)/Phone and Fax Number(s)		Other	Facility Dat	(a			
Jeff Kerwin (425)	257-8241			•				
Gene Bennett (42								•
	sponsible Official/Title/Phone and Fax Number.		\rightarrow					
Jeff Kerwin	The state of the s						*	
	vater Pretreatment Program							
	et, Everett, WA 98201 (425) 257-8241							
) 257-8241 _{Contacted?} Yes No					,		
	Section C: Areas Evaluated During Inspection	ion (Che	ck only those	areas evr	aluated)			
☑ Permit	☐ Flow Measurement		perations&N			CSO	/SSO (Sev	ver Overflow)
□ Records/Rep			ludge Handl		osal 🔲	Poll	ution Prev	ention

(note: This amended 2011Pretreatment Compliance Report has been issued to correct an error in the original 2011 Pretreatment Compliance Report. The original report specified the the date by which the City of Everett must submit a report to the Department of Ecology, in which the City of Everett describes the measures it has undertaken to ensure that timely and adequate enforcement responses are undertaken in the future. The original 2011 Pretreatment Compliance Report erroneously specified a submittal deadline of May 15, 2012. The correct submittal deadline is May 15, 2013, as specified in this corrected 2011 Pretreatment Compliance Report. The corrected date has been set forth in boldface in the text below. In addition, the permit number in the upper left block of the inspection report has been changed to WA24490 to conform to the Department of Ecology's most recent reconfiguration of its numerical permit designation nomenclature. The cross reference to the previous Pretreatment Compliance Inspection Report permit designation, is permit number WA24490.)

Pretreatment

Storm Water

Compliance Schedules

Laboratory

Multimedia

other

Purpose of Inspection/Methodology

Facility Site Review

Effluent/Receiving water

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 permittee 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 Naval Station Everett, and Stockpot, Inc. The permits were current and contained all the necessary provisions. The permit files were complete and contained the required number of sampling and inspections. Everett normally inspects and samples each significant industrial user at least two times per year. Timeliness of enforcement action against Stockpot, Inc. was determined to be inadequate, as discussed in more detail below, in this inspection report.

New Compliance Tracking Software Acquired

The City of Everett pretreatment program has acquired a new compliance monitoring software. The Linko brand software is designed for use as a grease control compliance module. However, the program expects that it will also be fully functional as a general pretreatment tracking tool.

New Upgrade Phase Begun on POTW Plant

The City of Everett has begun the next phase of a plan to increase plant capacity. This phase includes replacement of the biomedia in the air filter used for odor control. The site is also being prepared to begin construction of a new digester. Eventually, upgrades will include two new trickling filters, two new digesters, solids handling equipment for the digesters, and an additional secondary clarifier.

City of Snohomish to Connect to City of Everett POTW

The contract to accept wastewater from the City of Snohomish is expected to be signed in January 2012. The City of Everett expects to receive the first wastewater from the City of Snohomish in 2016. The decision of the City of Snohomish to transfer wastewater to the City of Everett POTW resulted from a consent decree between the Department of Ecology and the City of Snohomish.

Interjurisdictional Agreement Planned with City of Snohomish

The City of Everett plans to negotiate an interjurisdictional agreement with the City of Snohomish. The City of Everett expects that the interjurisdictional agreement will contain a provision under which the City of Snohomish is required to conduct an industrial user survey. Once the transfer of wastewater begins, the City of Everett expects to be responsible for all pretreatment functions in the Snohomish service area with the exception of administering the oil and grease program.

Grease Collection/ Dewatering Plant

The City of Everett expects that a private company will build a new grease-collection dewatering plant which is expected to begin operation next year. The plant is expected to have a batch discharge of approximately 50,000 gallons per day from a large equalization tank. The plant will be operated by Trans Energy and Standard Biodiesel. Mono- and di-glycerides from grease will be processed into boiler fuel at the plant.

Enforcement Response Plan Under Evaluation

The City of Everett is re-evaluating its Enforcement Response Plan (ERP) to determine whether it should be changed to simplify the manner in which administrative penalties are computed.

Boeing Undertaking Major Groundwater Cleanup Project

Boeing is undertaking a major groundwater cleanup project which is intended to remediate a tetrachloroethane plume. Discharges to the City of Everett POTW may be as high as 32,000 gpd. Startup of the plant is expected in the first quarter of 2012. The City of Everett is considering rolling

authorization for this discharge into Boeing's existing permit.

Permit Application Sent to Kimberly Clark

The new owner's plans for the Kimberly Clark paper mill property were still in flux at the time of the pretreatment compliance inspection. Shutting the pulp mill but keeping the paper mill open was under consideration. The plant was a direct discharger. If Kimberly Clark had commenced indirect discharge to the City of Everett POTW, the food-to-microorganism ratio at the POTW, could have been disrupted, with potential high-strength discharges of up to five million gallons per day. However both the paper mill and pulp mill were shut down in April 2012, and demolition of both the pulp mill and the paper mill commenced in August 2012. At this time, it is unclear whether site cleanup activities will result in any significant discharges to the City of Everett POTW.

Septic Sewage Conditions in Naval Station Everett Line

Septic sewage incidents have resurfaced in the sanitary sewer line leading from the Naval Station Everett. The Navy, under the technical guidance of The City of Everett's Technical Services Group, had been, for a period, adding ferrous sulfate to its wastewater to prevent anaerobic conditions from developing in this line. The Navy had apparently eliminated or reduced the dose of ferrous sultate applications. Following re-establishment of communications with the Technical Services Group, the incidence of anaerobic conditions was greatly reduced.

Stockpot Inc. pH Violations-Lack of Timely Enforcement Action

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 records indicated that pH violations hadoccurred during most of those months. However, the City of Everett did not take enforcement (a Notice of Violation and an Administrative Order) action until August 4, 2011. The Department of Ecology has evaluated the City of Everett's response, and has determined that although the City of Everett's lack of timely enforcement does not meet the criteria for SNC (Significant Non-Compliance), it nevertheless indicates a deficiency in the program.

The Department of Ecology is aware how difficult it is for a pretreatment system to achieve compliance under a system of continuous monitoring. Such systems often display intermittent low and high pH spikes, where a spike is defined as an excursion of brief duration outside the permitted standards. Despite the challenges in achieving consistent compliance, the City of Everett is required under its pretreatment delegation to take timely enforcement action to discourage further violations.

The Department of Ecology has determined that the City of Everett, although deficient in the timeliness of its enforcement action against Stockpot, Inc., is not in Significant Non-Compliance (SNC), as the City's ordinance gives the City of Everett a significant amount of discretion with respect to the types of enforcement actions it takes. However, it is the Department of Ecology's determination that the City of Everett came close to taking undue recourse to the enforcement discretion afforded in the language of its ordinance.

The following outlines enforcement actions the City of Everett has taken against Stockpot, Inc., as well as Stockpot Inc's responses to the enforcement actions:

- August 4, 2011: The City of Everett issued a Notice of Violation and Administrative Order to Stockpot, Inc. The City of Everett's Administrative Order required Stockpot to "provide a schedule with milestones for engineering and installing a system engineered to eliminate these types of violations.
- August 30, 2011: Stockpot, Inc. sent a letter to the City of Everett, in response to the City of Everett's Notice of Violation. In the letter, Stockpot notified the City of Everett that it had

11/28/2012

retained Dennis Group, LLC to "support our engineering requirements outlined in the Compliance Plan". The letter contained a compliance plan consisting of eight individual milestones and the estimated completion date for each milestone. Startup of the treatment system was associated with an estimated completion date of July 27, 2012.

- October 4, 2011: The City of Everett issued a letter entitled "Compliance Plan Approval", in which it conveyed its approval of Stockpot, Inc's proposed compliance plan, as set forth in its letter of August 30, 2011.
- October 18, 2011: The City of Everett received a letter from Stockpot, Inc., in which Stockpot advised the City of Everett that it had met the first milestone (Treatment System Technical Feasibility Evaluation) on schedule.
- November 14, 2011: The City of Everett received a letter from Stockpot Inc., in which the company notified the City of Everett that it had completed Task 2 (Treatment System Process Design) on time (in compliance with the scheduled date of October 28, 2011).
- January 12, 2012: The City of Everett received a letter from Stockpot Inc. in which the company notified the City of Everett that it had completed Task 3 (Treatment System Detailed Design) on time (in compliance with the scheduled date of December 30, 2011).
- April 17, 2012: The City of Everett received a letter from Stockpot, Inc., in which the company notified the City of Everett that it had completed Task 4 (Procurement) and Task 5 (Fabrication) on time (in compliance with the scheduled date of March 30, 2012).
- July 12, 2012: The City of Everett received a letter from Stockpot Inc., in which the company notified the City of Everett that it expected to run behind the scheduled milestone date (July 27, 2012) for Task 6 (Construction and Installation). As this date was later than the milestone date specified in the approved project schedule, the City of Everett included citation of this violation in its Notice of Violation dated August 6, 2012. Stockpot reported in a later letter that had completed Task 6 on August 20, 2012.
- September 17, 2012: Stockpot Inc. informed the City of Everett, in a letter, that it had achieved Milestone 7 (Startup of Treatment Plant) on August 31, 2012. This date was later than the plant startup date specified in the approved project schedule. The City of Everett had already included citation of this violation in its Notice of Violation dated August 6, 2012.
- A number of pH violations occurred during the construction phase of the project. The City of Everett issued a Notice of violation for these violations on August 6, 2012, for violations which occurred between February 2012 and June 2012, as well as for the failure to achieve milestones 6 and 7 by the required dates.
- Following startup of the new pH adjustment pretreatment system, a shake-down and
 adjustment period was required for Stockpot Inc's discharge to achieve consistent compliance
 with pH standards. During this adjustment period, Stockpot experienced a number of
 additional pH violations. The City of Everett is in the process of issuing a Notice of Violation
 for these violations. The City of Everett has evaluated the functioning of the new plant
 following the shake-down period and has determined that compliance with pH standards is
 greatly improved.

City of Everett Must Submit Report of Measures to Ensure Timely and Adequate Enforcement

11/28/2012

In the case of Stockpot Foods' pH violations, the City of Everett appears to have made excessive use of the discretionary provisions in its Enforcement Response Plan. The City of Everett should have begun taking enforcement action and escalating it as necessary, in a more timely manner, to bring Stockpot's discharges back into compliance with pH standards. Nevertheless, due to the existence of the discretionary provisions contained in the Enforcement Response Plan, the fact that the violations did not result in pass-through or interference at the POTW, and the fact that the City of Everett's enforcement action was appropriate and effective once undertaken, the Department of Ecology has determined that the City of Everett is not in Significant Non-Compliance (SNC) or Reportable Non-Compliance (RNC). However, no later than May 15, 2013, the City of Everett must submit a report to the Department of Ecology in which it describes the measures it has undertaken to ensure timely and adequate enforcement responses are undertaken in the future. The report may contain, as appropriate, proposed changes to the City of Everett's *Enforcement Response Plan*, as well as other similar remedies, such as internal review procedures.

Name(s) and Signatures of Inspector(s) Doug Knutson Doug Knuteson	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649- 3190-160th Avenue SE, Bellevue, WA 98008-5452	Date November 26, 2012
Signature of Management Q A Reviewer Lucky Management Q A Reviewer	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date 1 - 7 - 13

ANNOUNCED Inspection

INSTRUCTIONS

Section A: National Date 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:

Performance Audit

Compliance Biomonitoring

Compliance Evaluation (non-С sampling)

Diagnostic

Corps of Engineers Inspection

Pretreatment Follow-up Pretreatment Audit G

E - Corps of Engineers

Industrial User (IU) Inspection

Enforcement Case Support

Multimedia

Pretreatment Compliance Inspection

Reconnaissance

Compliance Sampling

IU Inspection with Pretreatment Audit

Х **Toxics Inspection**

Z Sludge 2 IU Sampling Inspection

IU Non-Sampling Inspection

IU Toxics Inspection

IU Sampling Inspection with Pretreatment

IU Non-Sampling Inspection with

pretreatment

IU Toxics with Pretreatment

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)

J - Joint EPA/State Inspectors - EPA Lead

N - NEIC inspectors

R - EPA Regional Inspector

S - State Inspector

T - Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use of 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 Section I Section II Section III	IU File Evaluation Supplemental Data Review/Interview Evaluation and Summary	
<u> </u>	Pretreatment Program Status Update Pretreatment Program Profile Worksheets [] WENDB Data Entry Worksheet [] RNC Worksheet [] IU Site Visit Report Form (Option [] File Review Worksheets (Optional	al) al)
Attachment D	Supporting Documentation	
DA name and address:	· · · · · · · · · · · · · · · · · · ·	Date(s) of PCI
City of Everett		December 6th, 2011
City of Everett	er-Pretreatment Program	December 6th, 2011 Period covered by PCI October 1st 2010 through September 30th, 2011
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201	er-Pretreatment Program	Period covered by PCI October 1st 2010 through
City of Everett Industrial Wastewat 3200 Cedar Stree	er Pretreatment Program t	December 6th, 2011 Period covered by PCI October 1st 2010 through September 30th, 2011
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City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI	Ex Pretreatment Program ES permit? INSPECTOR (S) Title/Affiliation Pretreatment Engineer	Period covered by PCI October 1st 2010 through September 30th, 2011 Yes No Telephone Number (425) 649-7025
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name	Ex Pretreatment Program INSPECTOR (S) Title/Affiliation	Period covered by PCI October 1st 2010 through September 30th, 2011 Yes No Telephone Number (425) 649-7025
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name	Ex Pretreatment Program INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology	Period covered by PCI October 1st 2010 through September 30th, 2011 Yes No Telephone Number (425) 649-7025
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name	Ex-Pretreatment Program ES permit? INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology CA REPRESENTATIVE (S)	Period covered by PCI October 1st 2010 through September 30th 2011 Yes No Telephone Number (425)649-7025
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name	Ex-Pretreatment Program ES permit? INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology CA REPRESENTATIVE (S) Title/Affiliation	Period covered by PCI October 1st 2010 through September 30th, 2011 Yes No Telephone Number (425)645-7025 Telephone Number
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name Doug Knutson	Expermit? INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology CA REPRESENTATIVE (S) Title/Affiliation Industrial Pretreatment Progres	Period covered by PCI October 1st 2010 through September 30th 2011 Yes No Telephone Number (425) 649-7025 Telephone Number 1 Manager (425) 259-8241
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name Doug Knutson Name	Ex Pretreatment Program INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology CA REPRESENTATIVE (S) Title/Affiliation Industrial Pretreatment Program Industrial Waste Inspector	Period covered by PCI October 1st 2010 through September 30th 2011 Yes No Telephone Number (425) 649-7025 Telephone Number n Manager (425) 259-8241 (425) 257-8240
City of Everett Industrial Wastewat 3200 Cedar Stree Everett, WA 98201 PIRT/DSS incorporated in NPDI Name Doug Knutson Name Jeff Kerwin	Expermit? INSPECTOR (S) Title/Affiliation Pretreatment Engineer Washington State Department of Ecology CA REPRESENTATIVE (S) Title/Affiliation Industrial Pretreatment Progres	Period covered by PCI October 1st 2010 through September 30th 2011 Yes No Telephone Number (425) 649-7025 Telephone Number 1 Manager (425) 259-8241

^{*}Identified program contact

ACRONYM LIST

	Term
Acronym	
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
	Gallons per day
gpd 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
. VV CIVUU	

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.

	COMMENTS	
	Total flow (gpd)	Process flow (gpd)
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Naval Station Everett	maximum	·
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Evenett, WA 98207	Naval Home bosse	<u>-</u>
		SNC (period. 3rt 97 2011)
ndustry visited during PCI Applicable Federal category	Compliance status	Noncompliance/corrected Noncompliance/continuing
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NARRATIVE	COMMENTS	
FILE 7703 Industry name and address	Total flow (gpd)	Process flow (gpd)
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Stock Pot, Inc.	- 0,0-0	:
1200 Merrill Creek Parkway	Type of industry (products m	anufactured)
Everet, WA 38203	Soup manufacturing	
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	Compliance status [] SI	NC (period:
Industry visited during PCI Applicable Federal category	_[] No	ncompliance/corrected
Yes [] No [Y N//]	No.	ncompliance/continuing
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SECTION I: IU FILE	VALUATION (Continued)
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	Type of industry (products manufactured)
	Type of mass y d
	Compliance status [] SNC (period:)
dustry visited during PCI Applicable Federal categor	r 1 Noncompliance/corrected
	Noncompliance/continuing
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and address	TVE COMMENTS Total flow (gpd) Process flow (gpd)
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	Total flow (gpd) Type of industry (products manufactured) Gory Compliance status [] SNC (period:)
FILEIndustry name and address Industry visited during PCI Applicable Federal cates	Total flow (gpd) Type of industry (products manufactured) Type of industry (products manufactured)
FILEIndustry name and address Industry visited during PCI Applicable Federal cates Yes [] No []	Total flow (gpd) Type of industry (products manufactured) Gory Compliance status [] SNC (period:)
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	Indu	stry Na	ime	l	INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for question, mark the square with a check (v). Use (Not Applicable) where nece ND (Not Determined) where there is insufficient information to evaluate/determined implementation status. Where a problem is indicated, mark with a numerical value provide a corresponding explanation in the comment area below. Comment of problem identified. For example, if the file is missing a notification of classification in the square and a matching statement as to the nature of the problem that space below. The next problem would be marked as (2) and so on. Clearly in that each comment pertains to; also indicate where a comment applies to all the square and a square and the square and the square area of the problem would be marked as (2).	nine value and in each ation, place a at exists in the ndicate the file
File	File	File	File	File	IU FILE REVIEW	Cite
1475	170	<u> </u>	<u> </u>	<u> </u>	THE REPORT OF THE	
					A. CA NOTIFICATION OF IU Notification of classification or change in classification	403.8(f)(2)(iii)
OK	OK			<u> </u>	d	403.8(f)(2)(iii)
OK	ok			١,	2. Notification of applicable standards/requirement	
Cor	nmer	ıts	•			

ile File File File	File		Reg.
File Fi	' ""	IU FILE REVIEW	Cite
		B. ISSUANCE OF IU CONTROL MECHANISM	, , , , , , , , , , , , , , , , , , ,
· ·		Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
ok ok	┸{	Control mechanism contents	403.8(f)(1)(iii);
-A	 -	a. Statement of duration (≤ 5 years)	
K OK		L Obstance of pontransterability	
OK OKO	1	c. Applicable effluent limits (local limits, categorical standards)	
oki oka		d Self monitoring requirements	
10 OKO		Identification of pollutants to be monitored	
~~~		Sampling frequency	17.5
NO OK	+	<ul> <li>Sampling locations/discharge points</li> </ul>	pi .
7200	<del></del>	Sample types (grab or composite)	
	1.	Reporting requirements	
	+	Pacord-keeping requirements	
OK OK	-:	e. Statement of applicable civil and criminal penalties	
OKO OKO		f. Compliance schedules	
OK OR		7 a Notice of stud loading	1
OK OK		h. Notification of spills, bypasses, upsets, etc.	
OKOK		i. Notification of significant change in discharge	
		j. 24-hour notification of violation/resample requirement	<u> </u>
OK OK	<u> </u>	k. Slug discharge control plan requirement	
1 Metals, PH,	, 2009 Bod 5,	9- September 29th, 2014 , TSS, FOG, no polar FOG, closed ap flesh point	
1 Motals, pH,	Bod 5	, TSS, FOG, no polar FOG, chised ap their point	• •
(B) Motals, PH,  (B) Monthly  (Comp Water Comple	Bod so Tee Nertio	\$ 611 water separation discharge 1sit.  Management)	•
1 Motals, pH, 2 Monthly 2 CCM Sample (Comp Water Co D No Compliana	Bod 3	\$ 511 water separation discharge point.  Management)  edule in permit	· ·
3 Motals, pH, 3 Monthly 1 CCM Sample (Comp Water Co  No Compliance	Bod 3	\$ 511 water separation discharge point.  Management)  edule in permit	he a 101 FA MOON
Motals, pH, Monthly Monthly CCM Sample Comp Water G No Compliand Rant V. E - ne Spill plan C	Bod 3	\$ 511 water separation discharge point.  Management)  edule in permit	keq ostemeq
Motals, pH, Monthly  Monthly  COM Sample  Comp Water Co  No Compliance  Pant V. E - no  Spli plan C	Bod of The lestion lestion scheme	to 1 water separation discharge point.  A fill water separation discharge point.  My Aguagement)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIA. Spill Plan has implement in thin aix months	tequiremeq
Motals, pH,  Monthly  Monthly  Comp water Compliance  No Compliance  Pant V. E - no  Spll plan C  In parmit.  B July 1, 2011	Bod so The lestion lestion sche he re overes	to 1 water separation discharge point.  A fill water separation discharge point.  My Aguagement)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIA. Spill Plan has implement in thin six months  30, 2016	
Motals, pH,  Monthly  Monthly  Comp water Compliance  No Compliance  Pant V. E - no  Spll plan C  In parmit.  B July 1, 2011	Bod so The lestion lestion sche he re overes	to 1 water separation discharge point.  A fill water separation discharge point.  My Aguagement)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIA. Spill Plan has implement in thin six months  30, 2016	
Motals, pH,  Monthly  Monthly  Comp water G  No Compliance  Pant V. E - no  Spll plan C  In pormit.  As, Cd, Cr,  by BODA	Bod of The lestion Lestion School of the Werel Light Cu,	TSS, FOG, no polar FOG, chised as p their point  f oil mater separation discharge port.  m f Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIIA. Spill Plan has my lement in this aix months  e 30, 2016  Pb, Hg, Ni, Ag, Zh, C. N  Total FOG, FOG non-polar, desired asp Flesh poin	
Motals, pH,  Monthly  Com Sample  Comp Water G  No Compliance  Pant V. E - no  Spill plan C  In pormit.  July 1, 2011  As, CJ, Cr,  PH, BODS,	Bod of The lesting Lesting School the Overell Lung Cu, TSG	# 51 mater separation discharge point  # 61/ mater separation discharge point  m # Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIIA. Spill Plan has implement in thin aix months  e 30, 2016  Pb, Hg, Ni, Ag, Zh, C. N  Total FOG, FOG non-polar, closed ap Flesh point  thour and we latins)	
Motals, pH,  Monthly  CCM Sample  Comp Water G  No Compliance  Pant V. E - no  Spill plan C  In pormit.  July 1, 2011  At CJ, Cr,  PH, BODG,	Bod of The lesting Lesting School the Overell Lung Cu, TSG	# 51 mater separation discharge point  # 61/ mater separation discharge point  m # Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIIIA. Spill Plan has implement in thin aix months  e 30, 2016  Pb, Hg, Ni, Ag, Zh, C. N  Total FOG, FOG non-polar, closed ap Flesh point  thour and we latins)	
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - ne  Spll plan C  In pormit.  July 1, 2011  As, CJ, Cr,  pH & Flow  Monitoning for	BoD of The Flore School of the Testing Cu , TSG have pl	# 51 mater separation discharge port.  # 61 mater separation discharge port.  m # Management)  edula in permit  quired (anticipate that spill plan will cover spills)  d in PartIIIA. Spill Plan has implement in thin aix months  e 30, 2016  Pb, Hg, Ni, Ag, En, C. N  Total FOG, Fob non-polar, classed ap flash poin  been their only violations)  11 continuous pill limite are 5.0 to 11.0	
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - no  Pant V. E - no  Dily 1, 2011  At , CJ, Cr,  PH & Flow  Monitorial for  Monitorial for	BoD of The lestion E sche were were Lyne Cu, buch plushing	FOG, no polar FOG, chised ap flesh point  f oil mater separation discharge port.  m f Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIII A. Spill Plan has implement in thin aix months  e 30, 2016  Pb, Hg, Ni, Ag, Zh, C. N  Total FOG, Fold non-polar, closed ap flesh poin  been their only violations)  is continuous pill limit are 5.0 to 11.6	
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - no  Pant V. E - no  Dolly 1, 2011  At , CJ, Cr,  pH & Flow  Monitorial for  Monitorial for	BoD of The lestion E sche were were Lyne Cu, buch plushing	FOG, no polar FOG, chised ap flesh point  f oil mater separation discharge port.  m f Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIII A. Spill Plan has implement in thin aix months  e 30, 2016  Pb, Hg, Ni, Ag, Zh, C. N  Total FOG, Fold non-polar, closed ap flesh poin  been their only violations)  is continuous pill limit are 5.0 to 11.6	
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - no  Pant V. E - no  No pormit  My July 1, 2011  As, CJ, Cr,  pH, BODS  (pH & Flow  monitoring for  Motals com	Bodos Tee Ilertio E sche Nere  Cu TSG have  hitery posik	FOI water separton discharge point  of oil water separton discharge point  of Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in Part III A. Spill Plan has implement in thin six months  of 30, 2016  Pb. Hg; Ni, Ag, En, C. N  Total FOG, Fob non-polar, closed ap flesh poin  been their only violations)  is continuous pill limits are 5.0 to 11.6  ing manbole  ph continuous, BODs/TSS/FOb are 2/week	+
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - no  Pant V. E - no  Dily 1, 2011  As, CJ, Cr,  pH, BODS  (pH & Flow  monitoring for  Motals com	Bodos Tee Ilertio E sche Nere  Cu TSG have  hitery posik	FOI water separton discharge point  of oil water separton discharge point  of Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in Part III A. Spill Plan has implement in thin six months  of 30, 2016  Pb. Hg; Ni, Ag, En, C. N  Total FOG, Fob non-polar, closed ap flesh poin  been their only violations)  is continuous pill limits are 5.0 to 11.6  ing manbole  ph continuous, BODs/TSS/FOb are 2/week	+
Motals, pH,  Monthly  CCM Sample  Comp Water Co  No Compliance  Pant V. E - no  Pant V. E - no  No pormit  My J, 2011  As, CJ, Cr,  pH, BODS  (pH & Flow  monitoring for  Motals com	Bodos Tee Ilertio E sche Nere  Cu TSG have  hitery posik	FOI water separton discharge point  of oil water separton discharge point  of Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in Part III A. Spill Plan has implement in thin six months  of 30, 2016  Pb. Hg; Ni, Ag, En, C. N  Total FOG, Fob non-polar, closed ap flesh poin  been their only violations)  is continuous pill limits are 5.0 to 11.6  ing manbole  ph continuous, BODs/TSS/FOb are 2/week	+
Motals, pH,  Monthly  Monthly  Comp water Co  No Compliance  No Compliance  Pant V. E - no  Pant V. E - no  No pormit  Moly 1, 2011  As, CJ, Cr,  pH, BODS  (pH & Flow  monitoring for  Motals com	Bodos Tee Ilertio E sche Nere  Cu TSG have  hitery posik	FOI water separton discharge point  # 61/ water separton discharge point  m & Management)  edule in permit  quired (anticipate that spill plan will cover spills)  d in PartIII A. Spill Plan has implement within aix months  e 30, 2016  PO, Hg, Ni, Ag, En, C. N  Total FOG, Fob non-polar, closed ap tlash poin  been their only violations)  is continuous, pill limite are 5.0 to 11.0  ing manhole  pH continuous, BOD; /TSS/FOG are 2/ week	+

	· 		1			Reg.
File	File	File	File	File	IU FILE REVIEW	Cite
		<u> </u>			C. CA APPLICATION OF IU PRETREATMENT STANDRDS	
6	മ					403.8(f)(1)(ii)
OK	OK		L	<u></u>	1: IU categorization	403.8(f)(1)(ii)
	<b>5</b>				Calculation and application of categorical standards	
OKLIVA	OKINI	<b>1</b> 22			a. Classification by category/subcategory	
OKIN	POKIN	WY .			b. Classification as new/existing source	
1	DELIN	1.27			c. Application of limits for all regulated pollutants	403.5(c)&(d)&.
	AV	1			3. Application of local limits	. 403.8(f)(1)(ii)
OK	8V	(B)	<u> </u>	<u> </u>	4. Calculation and application of production based-standards	403.6(c)
OKIY	<b>NOTION</b>	125	<u> </u>	<u> </u>	Calculation and application of production of State       Calculation and application of CWF or FWA	403.6(d)&(e)
OKNA	nkin	<i>5</i> 2	1	<u> </u>	5. Calculation and application of CVVI of CVVI	403.8(f)(1)(ii) *
OK	OK	1		1	Application of most stringent limit	

Comments

D non-categorical

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
		<u> </u>	<u></u>	<u> </u>		
					D. CA COMPLIANCE MONITORING	
	0	 }	1	1	Sampling  1. Sampling (once a year)	403.8(f)(2)(v)
OK	OK				Sampling at frequency specified in approved program     Documentation of sampling activities	403.8(f)(2)(vi)
OK OK	DIC				Analysis for all regulated parameters     Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
ok ©	) of	l	<u> </u>	 	Inspection  6. Inspection (once a year)	403.8(f)(2)(v)
O.K	OK	1			7. Inspection at frequency specified in approved program  8. Documentation of inspection activities	403.8(f)(2)(vi)
ok ok	OK				Documentation of inspection activities     Evaluation of need for slug discharge control plan	403.8(f)(2)(v)

### Comments

Sample Date for treatment plant sample sample Dak , for treatment plant semple D 03/29/11 03/14/11 Sample Parte barge (only sample one sample as only talle one each six months and there were normally expect more than one discharge in second six months. The neeson for no discharge is that discharge in the second six months from the barge is that bange worten is now boing sent through treatment plant. hote: The bange comp water was sent through cyclone.

(2) October 24th, 2011 and March 29th, 2011.

09/28/2011/09/22/2011/06/16/2011/06/17/2011/ 09/15/2010/09/16/2010/04/20/2010/09/2010 12/12/2009/12/02/2009/04/06/2009/04/07/2009

( Nov 15, 20 11, June 11, 2011, Sept 14, 2010, April 22, 2010, June 15, 200, Oct 24, 2009, June 15, 2009

File	File	File	File	File		Reg.
				·	IU FILE REVIEW	Cite
	<u> </u>			<u></u>	E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations a. Discharge violations b. Monitoring/reporting violations c. Compliance schedule violations 2. Calculation of SNC 3. Adherence to approved ERP	403.8(f)(2)(vi) 403.8(f)(2)(vi) 403.8(f)(5)
					Escalation of enforcement     Publication for SNC	403.8(f)(5) 403.8(f)(2)(vi)

Comments

IU FILE REVIEW   F.   IU COMPLIANCE STATUS	File File File File File File File File	12(e)&(h) 2(g)(1)&(h) 12(e)&(h) 12(e)&(h) 12(e)&(h) 13.12(l) 3.12(c) .12(g)(2) .12(g)(2) .12(g)(2)
F. IU COMPLIANCE STATUS  Self-Monitoring and Reporting  1. Sampling at frequency specified in control mechanism/regulation  1. Submission of BMR/90-day report  1. Submission of Compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule reports by required dates  1. Submission of compliance schedule gelostions  1. Submission of schedule gel	IU FILE REVIEW   Self-Monitoring and Reporting   1. Sampling at frequency specified in control mechanism/regulation   1. Sampling at frequency specified in control mechanism/regulation   1. Sampling at frequency specified in control mechanism/regulation   403.12   403.12   403.13   403.14   403.14   403.14   403.14   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15   403.15	12(e)&(h) 2(g)(1)&(h) 12(b) &(d) 12(e)&(h) 12(e)&(h) 13.12(l) 3.12(c) .12(g)(2)
Self-Monitoring and Reporting 1. Sampling at frequency specified in control mechanism/regulation 2. Analysis of all required politutants 3. Submission of BMR/90-day report 403.12(e)(1)(4) 404. Periodic self-monitoring reports 403.12(e)(1)(4) 403.12(e)(2) 403.12(e)(1)(4) 403.12(e)(2) 403.12	Self-Monitoring and Reporting  1. Sampling at frequency specified in control mechanism/regulation  2. Analysis of all required pollutants  2. Analysis of all required pollutants  3. Submission of BMR/90-day report  4. Periodic self monitoring reports  5. Reporting all required pollutants  6. Signatory/certification of reports  7. Submission of compliance schedule reports by required dates  8. Notification within 24-hours of becoming aware of violations  8. Notification within 24-hours of becoming aware of violations  9. Discharge violation  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  10. Notification of hazardous waste discharge  11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  NSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations  b. TRC	2(g)(1)&(h) 12(b) &(d) 12(e)&(h) 2(g)(1)&(h) 13.12(l) 3.12(c) .12(g)(2) .12(g)(2) .12(j)&(p) .8(f)(2)(v)
Self-Monitoring and Reporting 1. Sampling at frequency specified in control mechanism/regulation 2. Analysis of all required politutants 3. Submission of BMR/90-day report 403.12(e)(1)(4) 404. Periodic self-monitoring reports 403.12(e)(1)(4) 403.12(e)(2) 403.12(e)(1)(4) 403.12(e)(2) 403.12	Self-Monitoring and Reporting  1. Sampling at frequency specified in control mechanism/regulation  2. Analysis of all required pollutants  2. Analysis of all required pollutants  3. Submission of BMR/90-day report  4. Periodic self monitoring reports  5. Reporting all required pollutants  6. Signatory/certification of reports  7. Submission of compliance schedule reports by required dates  8. Notification within 24-hours of becoming aware of violations  8. Notification within 24-hours of becoming aware of violations  9. Discharge violation  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  10. Notification of hazardous waste discharge  11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  NSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations  b. TRC	2(g)(1)&(h) 12(b) &(d) 12(e)&(h) 2(g)(1)&(h) 13.12(l) 3.12(c) .12(g)(2) .12(g)(2) .12(j)&(p) .8(f)(2)(v)
1. Sampling at frequency specified in control mechanism regulation  2. Analysis of all required pollutants  3. Submission of BMR/90-day report  403.12(g/1)&60  403.12(g/1)&60	1. Sampling at frequency specified in control mechanism/regulation 2. Analysis of all required pollutants 3. Submission of BMR/90-day report 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 403.12 4	2(g)(1)&(h) 12(b) &(d) 12(e)&(h) 2(g)(1)&(h) 13.12(l) 3.12(c) .12(g)(2) .12(g)(2) .12(j)&(p) .8(f)(2)(v)
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Slug load  ONU  Slug load  Accidental spill  ONU  Resampling/reporting within 30 days of knowledge of violation  Responsibility  Responsibility  Reporting  Resampling/reporting within 30 days of knowledge of violation  Size of the standard of the standard of slug discharge control plan  403.12(0)(20)(20)(11)  Responsibility  Reporting in concompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  SISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  403.12(0)  403.12(0)  403.12(0)  403.8(f)(2)(vii)  403.8(f)(2)(vii)  403.12(0)  403.8(f)(2)(viii)  403.12(0)  403.8(f)(2)(viii)  403.12(0)  403.8(f)(2)(viii)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  403.12(0)  4	Slug load Accidental spill Resampling/reporting within 30 days of knowledge of violation 9. Resampling/reporting within 30 days of knowledge of violation 403. 403. 403. 404. 405. 406. 407. 408. 409. 409. 409. 409. 409. 409. 409. 409	.12(j)&(p) .8(f)(2)(v)
Accidental spill  NK  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  9. Resampling/reporting within 30 days of knowledge of violation  10. Notification of hazardous waste discharge  11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  ITRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  14. SNC  15. SNC  16. SNC  16. SNC  17. Other discharge violations (specify)  18. Noncompliance with reporting requirements (but not SNC)  18. Other discharge violations (specify)  19. Other discharge violations (specify)  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  17. Noncompliance schedule in permit.  18. Noncompliance with reporting requirements (but not SNC)  19. Other discharge violations (specify)  19. Noncompliance with reporting requirements (but not SNC)  19. Other discharge violations (specify)  19. Noncompliance with reporting requirements (but not SNC)  19. Noncompliance with reporting requirements (but not SNC)  19. Noncompliance with reporting requirements  19. Noncompliance with reporting requirements (but not SNC)  10. Solid Soli	Accidental spill     Resampling/reporting within 30 days of knowledge of violation     Resampling/reporting within 30 days of knowledge of violation     Resampling/reporting within 30 days of knowledge of violation     10. Notification of hazardous waste discharge     11. Submission/implementation of slug discharge control plan     12. Notification of significant changes     12. Notification of significant changes     12. Notification of significant changes     13. Noncompliance status by placing and "X" in the appropriate box.      Discharge     13. Noncompliance with discharge limits (but not SNC)     14. SNC     a. Chronic violations     b. TRC     403.	.12(j)&(p) .8(f)(2)(v)
9. Resampling/reporting within 30 days of knowledge of violation  10. Notification of hazardous waste discharge  11. Submission/implementation of stug discharge control plan  12. Notification of significant changes  ISTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  15. TRC  16. C. Pass through or interference  20. Spill or stug load  30. Cher discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  403.8(f)(2)(vii)  15. Noncompliance with reporting requirements  15. Noncompliance with reporting requirements  15. Noncompliance with reporting requirements  16. Now with reporting requirements  17. Navy assembly that it was not aware of spill  18. Navy assembly that it was not aware of spill  19. Submitted as any has chiscontinued discharging through that sample point.  19. Shung assembly that a paparation (submitted but required in paparatic.)  19. Shung assembly that a sumplimic flow Michael but required in paparatic.  19. Shung assembly that a sumplimic flow Michael but required in paparatic.  19. Shungs on auditable flow Michael and 2432011 & another a Dethazo 2011  19. Shungs on auditable spills. Notification for put no letters was made in a timely major by Stockfort by e-mq. I.	9. Resampling/reporting within 30 days of knowledge of Violation  10. Notification of hazardous waste discharge  11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  13. Noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations b. TRC  403.	.12(j)&(p) .8(f)(2)(v)
10. Notification of hazardous waste discharge control plan  11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  13. Notification of significant changes  1403.12(i)  15. Notification of significant changes  15. Notification of significant changes  16. Notification of significant changes  17. Notification of significant changes  18. Notification of significant changes  19. Notification  1	10. Notification of hazardous waste discharge 11. Submission/implementation of slug discharge control plan 12. Notification of significant changes  VSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge 13. Noncompliance with discharge limits (but not SNC) 14. SNC 2 Chronic violations 3 Discharge limits (but not SNC) 403.	.8(f)(2)(v)
11. Submission/implementation of slug discharge control pian (403.120)  12. Notification of significant changes (403.120)  13. Noncompliance status by placing and "X" in the appropriate box.  Discharge (13. Noncompliance with discharge limits (but not SNC)  14. SNC (14. SNC)  14. SNC (14. SNC)  15. Noncompliance with discharge limits (but not SNC)  16. C. Pass through or interference (16.3.12(n))  17. C. Pass through or interference (16.3.12(n))  18. SNC (19. Spill or slug load (19. Other discharge violations (specify))  19. Reporting (19. Spill or slug load (19. Other discharge violations (specify))  19. Reporting (19. Spill or sugments)  19. Noncompliance with reporting requirements (but not SNC) (19. A03.8(n)(2)(vii)  19. Noncompliance schedule in permit.  19. Noncompliance schedule i	11. Submission/implementation of slug discharge control plan  12. Notification of significant changes  12. Notification of significant changes  13. Noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations b. TRC  403.	
12. Notification of significant changes   13. Noncompliance status by placing and "X" in the appropriate box.	12. Notification of significant changes  NSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.  Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations b. TRC  403	
Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  14. SNC  AD3.8(f)(2)(vii)  15. Noncompliance with discharge limits (but not SNC)  16. SNC with reporting requirements (but not SNC)  17. Noncompliance with discharge limits (but not SNC)  18. OK  19. C. Pass through or interference  19. Spill or slug load  19. Noncompliance with reporting requirements (but not SNC)  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  16. SNC with reporting requirements  16. Now a compliance schedule in permit.  16. Navn assents that it was not aware of spill.  17. Presampling not conducted as Navy has chiscontinued discharging through that sample foint.  18. Show assents it was not aware of spill.  19. Sibmitted a compliance Plan preparation (subantited not required in permit.)  19. Now assents it was not aware of spill.  19. Sibmitted a compliance Plan Mikston Letter in 24, 2011 & amother a Decharge, 2011  19. No Ships on according to the Mikston Letter in 24, 2011 & amother a Decharge, 2011  19. No Ships on according to the plane.  19. No Ships on according to the plane.  19. Shorthard by Stockyet by e-mq. 1.  19. March 31, 2010 (Ship Plan Update).	Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations  b. TRC  403.	
Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  14. SNC  14. SNC  15. TRC  16. Pass through or interference  25. Spill or slug load  36. Other discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  16. SNC with reporting requirements  16. Noncompliance schedule in permit.  16. Now assents that it was not aware of spill.  17. Presampling not conducted as Navy has chiscontiqued discharging through that sample fourt.  17. Slug discharge plan preparation/submitted not required in permit.  17. Navy assents it was not aware of spill.  18. Silvent of aware of spill.  19. Silvent or additional plan Misston Letter in 24, 2011 & another an Octobary 2011  19. No Slives or additional spills. Notification for pil violations were male in a timely manger by Stockpot by e-mg, 1.  18. March 31, 2010 (Sling Plan Updale).	Discharge  13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations b. TRC  403.	
13. Noncompliance with discharge limits (but not SNC)  14. SNC  a. Chronic violations b. TRC c. Pass through or interference e. Spill or slug load d. Other discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  No compliance schedule in permit.  Navy asserts that it was not aware of spill.  Presampling not conducted as Navy has chiscontinued discharging through that sample fourt.  Slug discharge plan preparation/submitted but required in prehabit.  Navy asserts it was not aware of spill.  Submitted a compliance Plan Misston Letter in 24, 2011 & another on cothars, 2011  No Slugs on additional spills. Notification for pil violations were made in a timely manger by Stockpot by e-Mg. 1.  March 31, 2010 (Slug Plan Updale).	13. Noncompliance with discharge limits (but not SNC) 14. SNC a. Chronic violations b. TRC 403.	
14. SNC a. Chronic violations b. TRC c. Pass through or interference spill or slug load d. Other discharge violations (specify)  Reporting 15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  No compliance schedule in permit.  Navy asserts that it was not aware of spill resampling not conducted as Navy has chiscontiqued discharging through that sample front.  Slug discharge plan preparation/submitted not required in parait. Navy asserts it was not aware of spill.  Sign discharge plan preparation/submitted not required in parait. Navy asserts it was not aware of spill.  Sign ittel a complime Plan Meeton Letter in 24,2011 & another on October 2011  No Slugs on accompliance Plan Meeton Letter in 24,2011 & another on October 2011  No Slugs on accompliance Plan Meeton Letter in 24,2011 & another on October 2011  No Slugs on accompliance Plan Meeton Letter in 24,2011 & another on October 2011  Minuly Mynna by Stockypt by e-Mg. 1.  March 31, 2010 (Slug Plan Update).	14. SNC  a. Chronic violations  b. TRC  403	0(#\/C\/#i)
b. TRC c. Pass through or interference spill or slug load d. Other discharge violations (specify)  Reporting 15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  None compliance schedule in securit.  Navy asserts that it was not aware of aprill resampling not conducted as Navy has chiscontiqued discharging through that sample fount.  Sly discharge plan preparation/submitted not required in Pannit. Navy asserts; two not aware of april.  Signification and income plan preparation/submitted not required in Pannit. Navy asserts; two not aware of april.  Signification and income plan preparation/submitted not required in pannit.  Now asserts; two not aware of april.  Signification for pill not plan to be a second of a second	b. TRC	O(1)(Z)(VII)
De CK C. Pass through or interference  Spill or slug load  d. Other discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  Comments  No compliance schedule in permit.  Navy asserts that it was not aware of spill  resampling not conducted as Navy has discontinued discharging through that sample fourt.  Slug discharge plan preparation/submitted not required in Parmit.  Navy asserts it was not aware of spill.  Sibnited a complime Plan Misston Lother in 24,2011 & another in October 20,2011  No Slugs on according by Stockyot by e-Mg. 1.  March 31,2010 (Slug Plan Updak).	OK b. TRC 400	•
C. Pass through or interference  Spill or slug load  d. Other discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  No compliance schedule in permit.  Navy assents that it was not aware of spill  resampling not conducted as Navy has chiscontiqued discharging through that sample foint.  Slug discharge plan preparation/subantital not regimed in permit.  Navy assents it was not aware of spill.  Sibnited a complimic Plan Mikston Letter in 24,2011 & another in permit.  No Slugs on according by Stockfort by e-Mg, 1.  March 31,2010 (Slug Plan Updale)		3 5(a)(1)
OK OK Other discharge violations (specify)  Reporting  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  17. Navy asserts that it was not aware of spill  18. resampling not conducted as Navy has chiscontiaved discharging through that sample foint.  18. Sluy discharge plan preparation/submitted not required in prehait.  18. Navy asserts it was not aware of spill.  18. Sibnited a complimic Plan Mileston Letter in 24,2011 & another on Dethisology.  19. Notification for ph violations were mall in a timely impanse by Stockpot by e-mg. 1.  18. March 31,2010 (Shy Plan Update)		
Reporting Reporting 15. Noncompliance with reporting requirements (but not SNC)  15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  No compliance schedule in permit.  Namy assents that it was not aware of spill  resampling not conducted as Navy has discontinued discharging through that sample foint.  5 lly discharge plan preparation/submitted hot required in parail.  Navy assents it was not aware of spill.  Submitted as compliance Plan Mikeston Letter in 2452011 & another an actorization of Not Slays on action fall spills. Notification for ph notations were made in a timely image by Stockart by e-may.  16. March 31, 2010 (Slay Plan Update).	• Spill or siug load	00.12(1)
15. Noncompliance with reporting requirements (but not SNC)  16. SNC with reporting requirements  16. SNC with reporting r	d. Other discharge violations (specify)	
15. Noncompliance with reporting requirements (but not one)  16. SNC with reporting requirements  17. Navy asserts that it was not aware of spill.  17. Slug discharge plan preparation/submitted not regimed in public.  18. Slug discharge plan preparation/submitted not regimed in public.  19. Slugs on according Plan Mileston Letter in 24, 2011 & another on Dethically.  19. Slugs on according Plan Mileston Letter in 24, 2011 & another on Dethically.  19. Slugs on according to the starting for pil moletters were made in a timely improve by Stockpit by e-mail.  19. March 31, 2010 (Slug Plan Updale.)	Reporting 403	8(f)(2)(vii)
16. SNC with reporting requirements  No compliance schedule in permit.  Navy asserts that it was not aware of 3PIII  resampling not conducted as Navy has discontinued discharging through that sample front.  Slug discharge plan preparation/submitted not regimed in premit.  Navy asserts it was not aware of 3PIII.  Sibnitted a compliance Plan Mileston Letter in 24,2011 & another on act 20,2011  No Slugs on according all spills. Notification for pil violations were made in a timely manner by Stockjot by e-Mg. 1.  (B) March 31,2010 (Slag Plan Update.)	15. Noncompliance with reporting requirements (but not one)	
Normalismone schedule in permit.  Navy assents that it was not aware of spill  resampling not conducted as Navy has discontinued discharging through that sample point.  They discharge plan preparation/submitted not regimed in premait.  Navy assents it was not aware of spill.  Sibnited as complimed Plan Mileston Letter in 24,2011 & another as October, 2011  No Slugs on according a spills. Notification for pil violations were made in a timply manner by Stockart by e-mail.  March 31,2010 (Slug Plan Update)	16. SNC with reporting requirements	
to the lack of a increasing pro	sample front.  5 sumple front.  6 sumple front.  7 sumple front.  6 sumple	
and the stars for blues being in 5NC under 40CFR Port 403(f)(2)(viii).	(5) March 31, 2010 (Slay Plan Update.)	ر}

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## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

	JCTIONS: Complete this documentation where ap	AM MODIFIC	ATION [40	)3.18]			Yes	No
<u> </u>	documentation where ap PRETREATMENT PROGE			Ť			163	
	Did the CA make substan	tial changes to	the pretre	eatment progr	am that were not			
	Did the CA make substant approved by the Approval	Authority (e. g	., gemanoi	101 11111107	· · · · · · · · · · · · · · · · · · ·			
	If yes, describe.							
	•	•			•			
				•				
						i		
	•				•			
		•		1 .	•			•
	•	,		/				
					•			•
							Vac	.No
	Is the CA in the process	of modifying a	ny approv	red pretreatm	ent program		Yes	No No
•	Is the CA in the process component (including le	of modifying a	iny approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
•	component (including le	of modifying a	ny approv ocal limits,	ed pretreatm DSS require	ent program ments, etc.) ?		Yes	No
-	component (including le	of modifying a	пу approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a	any approv ocal limits,	ed pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, lo	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approvocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	ed pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, lo	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	ed pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No
	component (including le	of modifying a gal authority, k	any approv ocal limits,	red pretreatm DSS require	ent program ments, etc.) ?		Yes	No

B. IU CHARACTERIZATION [ 403.8(f)(2)(i)	&(ii)]	·
11 - O TAND D/E/D\/3\1	•	hanges in wastewater discharges at existing
o monthly review of	business luances	
ocoordinate with E	ng invering & Public Se	ervices on new building
Iran-pround su	rveys	
· coordinate with a	building inspectors	
· coordinate with a	, water use rec	ords -
,		
	. •	
How many IUs are currently identif	ried by the CA in each of the folio	owing groups?
	efined by the CA) [WENDB - SIUS	
a. 21 5103 (as us	CIUs (including zero-dischargi	
1 <u>2</u>		g zero-discharging noncat. SIUs)
b. 8 Other regul	Zero-discharger noncategorical ated noncategorical IUs (specify	1) (discharge, authorizations,
c. 29 TOTAL		many construction dewatery
		ma grand or le creatop.

	mechanism?		•			covered b			•		
	o. How many SIUs a	not cove	arod by an	existina. (	unexpire	d permit or	other		$\bigcirc$ .		<i>O</i> .
ŀ	<ul> <li>How many SIUs a individual control</li> </ul>	mechanism	? [WEND	B - NOCM	] [RNC - I	1]		•			
	If any, explain.										
	ø			•				•			
	•										
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	•				•		•				
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	•				•						
									£ 16 a	Т	0
	How many control r	mechanism	s were no	t issued w	ithin 180	days of the	e expirat	ion date o	f the		0
·•	previous control me	mechanism echanism ?	s were no [RNC - II]	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	How many control of previous control me	mechanism echanism ?	s were no [RNC - II]	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
· ·	previous control me	mechanism echanism ?	s were no [RNC - II]	t issued w	ithin 180	days of the	expirat	on date o	f the		0
•	previous control me	mechanism echanism ?	s were no [RNC - II]	t issued w	ithin 180	days of the	e expirat	on date o	f the	,	0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0
	previous control me	mechanism echanism ?	s were no	t issued w	ithin 180	days of the	e expirat	on date o	f the		0

D. AF	PPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS				
1.	<ul> <li>a. How many SIUs were not evaluated for the need to develop slug discharge the last 2 years? [403.8(f)(2)(vi)]</li> </ul>	e control	plans in		0
	b. List the SIUs below or attach additional sheets as needed.				
			. 1		•
			N/A	Yes	No
2.	Did the CA apply all applicable categorical standards and local limits to IUs		X	.03	. 10
,	whose wastes are hauled to the POTW?  The City of Eventh ordinance does not allow discharge of he	aled	wäste	<b>!</b> \$ .:	
	If yes, identify the industries.			, -	
			•		
					•
	lf no, explain.				
•					
3.	Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]	<u> </u>		Yes	No ×
	If yes, identify and explain.				
	n yes, rectury and explain.			•	• .
				đ	
		•			
-					
			٠		

E. APPLICATION OF PRETE	REATMENT STA	ANDARDS AND	REQUIREMENTS			
1. Identify the following.			<del></del>			
Program	Required	Actual		Explain Difference		
Aspect	Frequency	Frequency	1	EXPIGNITE INTERPRETATION		
a. Inspection	1	- <del> </del>	I			
• CIUs		2	· · ·			
<ul> <li>Other SIUs</li> </ul>						
b. Sampling (by CA)						
• ClUs		2				
Other SIUs		2	<u> </u>			
c. Self – Monitoring		The state of the s	Consimply frequest	Ch )		
• CIUs		guenting	(minimum they	dia		
<ul> <li>Other SIUs</li> </ul>		gucuterly	Contraction vicin	The state of the s		
d. Reporting	·	- 1 - 1 - 1 - 1	Commen frequence	**************************************		
• CIUs						<u> </u>
Other SIUs		d what percent	age of SIUs were the	e following? [403.8(f)(2)	(vi)] [WENDB -	
2. In the past 12 months	s, now many, ar	d wikat percent	age of, clos trains			
NOIN] [RNC - II] a. Not sampled or no	nt inspected at le	east once (WEN	NDB - NOIN]	0#***		<u>%</u>
b. Not sampled at le	ast once			<u> </u>	<u> </u>	<u>%</u> %
c. Not inspected at le	east once			0 .	<u>O</u>	70
C. Not hispected at it						

If any, explain.

* except for zono discharges & NSCIU for which frequency of inspection is one peryler ** except for zero discharges (0) and NSCIU(1)

*** except non discharges CIUS & NSCIUS annually

*** except zero obstruspes not samples.

F. ENFORCEMENT				
Which of the following enforcement actions did the CA	use?		· 	NIc.
The state of the s		N/A	Yes	No.
a. Notice or letter of violation	·		<del>- \\ \</del> -	
b. Administrative orders			_ <del>\</del> \	
c. Administrative fines	·			<del></del>
d. Show cause hearings	· · ·		<del></del>	
e. Compliance schedules	<u> -</u> -	<del>  </del>		<del></del>
f. Permit revocation	<u> </u>			
g. Civil suits	<del> </del>			$\prec \sim$
h. Criminal suits			<del></del>	$\rightarrow$
i. Termination of services				$\rightarrow$
j. Other (specify)	<u> </u>			
	•		•	
Explain if appropriate				
	•		•	
		•		
				,
•				· -
	÷			
,	•			
	•			
	•			
		N/A	Yes	No
2 Did the CA comply with its approved ERP? [403.8(f)(5)	] [RNC - II]			•
2. Did the CA comply with its approved ERP? [403.8(f)(5)	] [RNC-II]			•
2. Did the CA comply with its approved ERP? [403.8(f)(5) * However, the City of Grenett, in the co	] [RNC-11] Lise of Stockpot			•
2. Did the CA comply with its approved ERP? [403.8(f)(5)  * However, the City of Grenett, in the ca to have made excessive use the disc	] [RNC-11] Lise of Stockpot Listouary Provisio			•
2. Did the CA comply with its approved ERP? [403.8(f)(5)  * However, the City of Grenett, in the ca to have made excessive use the disc Enforcement Response Plan. (582 Name	IRNC-111 use of Stockpot metionary provision mative portion of			**
* However, the City of Everett, in the co to have made excessive use the disc Enforcement Response Plan. (SPR Man	I [RNC-11] use of Stockpot metrousing provision mative portion of			•
* However, the City of Everett, in the ca to have made excessive use the disc Enforcement Response Plan. (SRE Man for greater detail.	use of Stockpot metionary provision mative portion of	Foods us of uspecto	appeau 1ts	s ort
* However, the City of Grenett, in the ca to have made excessive use the disc Enforcement Response Plan. (SRE Man for greater detail.	use of Stockpot metionary provision mative portion of	Foods us of uspecto	appeau 1ts	s ort
However, the City of Grenett, in the ca to have made excessive use the disc Enforcement Response Plan. (SER Man for greater detail.	netionary provision ative portion of	Foods as of Inspecto	appear 175 09 hep	erits from
However, the City of Grenett, in the car to have made excessive use the disc Enforcement Response Plan. (SRE Nam for Jungter detail.  3. Indicate the number and percent of SIUs that were ide the CA's last pretreatment program report. If the CA'	entified as being in SNC* with	Feeds  as of  Inspector  the following information	appear 175 09 hep ng requiren n, obtain th	nents from
However, the City of Grenett, in the ca to have made excessive use the disc Enforcement Response Plan. (SER Man for greater detail.	entified as being in SNC* with	the following information	appear  1 ts  on rep  ing requiren  n, obtain th	nents from e
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However, the City of Grenett, in the care to have made excessive use the disc Enforcement Response Plan. (SR Namber June ter detail.  3. Indicate the number and percent of SIUs that were idented the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the CA's Self - monitoring requirements.	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period and and reporting requirements	the following information the series *SN	appear  1 ts  on hep  ing requiren  n, obtain the  sophe  IC defined	nents from e
However, the City of Grenett, in the care to have made excessive use the disc Enforcement Response Plan. (SR Namber Jean detail.)  3. Indicate the number and percent of SIUs that were idented the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the care of the CA's last pretreatment program report. If the CA's last pretreatment program reports in the CA's last pretreatment program requirements and the care of the care o	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period and and reporting requirements	the following information that the following information the following information the following information that the following information information the following information information the following information inform	appear  1 ts  on hep  ing requiren  n, obtain the  sophe  IC defined	nents from e
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However, the City of Grenett, in the control have made excessive use the edisc Enforcement Response Plan. (SR Name for Junature detail.  3. Indicate the number and percent of SIUs that were idented the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the control of the most recent four full quarters during the control of the most recent four full quarters during the control of the most recent four full quarters during the control of the c	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period ards and reporting requirements are sedules	the following information that the following information the following information that the following information information the following information informatio	appear its on hep ing requirent in, obtain the copie	nents from e
However, the City of Grenett, in the care to have made excessive use the disc Enforcement Response Plan. (SRe Namber Jean detail.)  3. Indicate the number and percent of SIUs that were identified the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the CA's last pretreatment full quarters during t	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period ards and reporting requirements are sedules	the following information that the following information the following information that the following information information the following information informatio	appear its on hep ing requirent in, obtain the copie	nents from e
However, the City of Grenett, in the care to have made excessive use the disc Enforcement Response Plan. (SRe Namber Jean detail.)  3. Indicate the number and percent of SIUs that were identified the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the CA's last pretreatment full quarters during t	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period ards and reporting requirements are sedules	the following information that the following information the following information that the following information information the following information informatio	appear its on hep ing requirent in, obtain the copie	nents from e
However, the City of Grenett, in the control have made excessive use the edisc Enforcement Response Plan. (SR Name for Junature detail.  3. Indicate the number and percent of SIUs that were idented the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the case of the case	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period ards and reporting requirements are sedules	the following information that the following information the following information that the following information information the following information informatio	appear its on hep ing requirent in, obtain the copie	nents from e
However, the City of Grenett, in the care to have made excessive use the disc Enforcement Response Plan. (SRe Namber Treater detail.)  3. Indicate the number and percent of SIUs that were idented the CA's last pretreatment program report. If the CA' information for the most recent four full quarters during the CA's last pretreatment full quarters during the CA	entified as being in SNC* with s report does not provide this ag the inspection.  SNC Evaluation Period ards and reporting requirements are sedules	the following information that the following information the following information that the following information information the following information informatio	appear its on hep ing requirent in, obtain the copie	nents from e

F FN	FORCEMENT (Continued)	Yes	No
1 . 1.		×	
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)]		
		•	
		•	
		•	
		• • • • • • • • • • • • • • • • • • • •	
1		`	
<u></u>	How many SIUs are in SNC with self-monitoring requirements and were not inspect	ed and/or	0
5.	How many SiUs are in SNC with schill quarters)? [WENDB - SINN] sampled (in the four most recent full quarters)? [WENDB - SINN]		
6.	a. Did the CA experience any of the following caused by industrial discharges?	·	
	Yes No	Unk	Explain
	X		·
	• Interference		
	<ul> <li>Pass through</li> <li>Fire or explosions (flashpoint, etc.)</li> </ul>	<u> </u>	
1	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		<u> </u>
	* Morker health and salety  Other (specify)  * Investigating correspond passibly due to Navy distributes of Sally waits  * Navy desci sall	r (comment holding to	an kist, balane water Fluidg: weiter
	* investigating corrusion possibly	Yes	No
	b. If yes, did the CA take enforcement action against the IUs causing or	X	
	h if ves, gig the CA take enforcement	_	
	continuing to pass an original and the forter to low late 18 re	coverect.	
	Notice of Violetian issued to Navy, & Casts Calculate 1.8 re		

ENI	FORCEMENT (Continued)			/
	a. How many SIUs are on compliance schedules?	•		
	b. List these SIUs by name and compliance schedule end date	s (attach additional she	ets as needed)	
•	b. List these SIUs by hame and compilates solution of sale	End Date		
		Aryust 21, 2012.		
	5fockpot	7.		
			Yes	No
	Were any CIUs allowed more than 3 years from the effective da	ate of a categorical		V
	Were any Clus allowed more than 3 years from the checked as		· · · · · · · · · · · · · · · · · · ·	
	standard to achieve compliance? [403.6(b)]			
	If yes, identify and explain.			
		•		
		•	•	
			Yes	No
٠,			162	i NO
	Did any SIUs return to compliance by any of the following? [RN	[C -1]		T
	a. Within 90 davś	-	$-\hat{\mathbf{x}}$	
	b. Within the time specified in the ERP	<u> </u>		
	c. Through a compliance schedule	tt-\0		
	component (including legal authority, local limits, DSS requires	nents, etc.) ?		
		•	•	
			•	
			•	
		•		
	DDITIONAL EVALUATIONS			
AL	JUITIONAL EVALUATIONS			
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			r .	
	TION II COMPLETED BY: Day Knitery		DATE: Def	m15 20
ンニし	TITLE: Environmental Engineer	TE	LEPHONE:	.,
	111 POLITICAL PROPERTY OF THE		DATE:	

TELEPHONE:

POTW REPRESENTATIVE

PROVIDING RESPONSES:

## SECTION III: EVALUATION AND SUMMARY

STRUCTIONS: Identify program components that the plement in order to effectively implement the pretreasecify the corrective action the CA needs to take.			Checklist	Act	ion
echy the control		Regulatory	· Question(s)	Rec.	Req.
Description		Citation	Question(e)		
CA PRETREATMENT PROGRAM MODIFICATION		100.40	II.A	T T	
Netific of program modification	L	403.18			
No further requirements.	•	•		• .	
	*	*			
1					
• ,		*		•	• •
		•			·
	•				
. IU CHARACTERIZATION		403.8(f)(2)(i)	· II.B		
Identify and locate all SIUs	· L_	400.0(.)(-)(7			
No further requirements.					
The first time			•		
•			•		
				٠.	
					•
	-			•	
					T
2. Identify the character and volume of pollutants		403.8(f)(2)(ii)	II.B.1; II.E.1		
contributed to POTW DV IUS	•		•		•
No further requirements.					
No further requirements.	•			•	:
		•			
	•	•	•	·	
•					
C. CONTROL MECHANISM EVALUATION		403 8(f)(1)(iii)	I.B.1; II.C.1 & 2	2	
1 Issue individual control mechanisms to all order	L	403.0(1)(1)(1)			
No further requirements.					
				,	
			•		
	*				

# ( SECTION III: EVALUATION AND SUMMARY (Continued)

		Regulatory	Checklist	Ac	tion ·
Description	.	Citation	Question(s)	Rec.	Req.
CONTROL MECHANISM EVALUATION (Con	tinued)				
Ensure control mechanisms contents include:		403.8(f)(1)(iii)	I.B.2.a-j	T .	
. Ensure control mechanisms contents include.	l.	100:0(1)(1)(1)(1)			
<ul><li>a. A statement of duration</li><li>b. A statement of nontransferability</li></ul>	g. Notic	liance schedules e of slug loading	passes, upsets, etc.		•
<ul><li>c. Effluent limits</li><li>d. Self - monitoring requirements</li><li>e. A statement of penalties</li></ul>	<ol> <li>Notific</li> </ol>	cation of significan	t change in discharge olation/resample requi	rement	•
No further requirements.	<b>a</b>	. :			
O. APPLICATION OF PRETREATMENT STAND	ARDS AND	REQUIREMENT	S .		,
. Apply all applicable pretreatment standards		403.8(f)(1)(iii)	I.B.2.a-j	<u> </u>	1
No further requirements	S,				
	••	• 		·	•
2. Evaluate the need for SIUs to develop slug disc		403.B(f)(1)(ii); 403	.5   I.C.1 - 6; II:D.2	Τ .	1
control plans	G ILI 90				
No further requirements.					
		• .		•	
•					
E COMBULANCE BEOMITODING			•		
E. COMPLIANCE MONITORING  1. Inspect and sample each SIU in accordance w	<i>r</i> ith .	Approved progra	m   I.D.2 & 7; II.E.1		1
<ol> <li>Inspect and sample each SIU in accordance w approved program</li> </ol>	• *	Approved progra	m   I.D.2 & 7; II.E.1		
1. Inspect and sample each SIU in accordance w	• *	Approved progra	m   I.D.2 & 7; II.E.1		
<ol> <li>Inspect and sample each SIU in accordance w approved program</li> </ol>	• *	Approved progra	m   I.D.2 & 7; II.E.1		

# SECTION III: EVALUATION AND SUMMARY (Continued)

	Regulatory	Checklist	Act	
	Citation	Question(s)	Rec.	Req.
Description			•	
COMPLIANCE MONITORING (Continued)	403.8(f)(2)(v)	I.D.1 & 6; II.E.1 &		i
Inspect and sample each SIU once a year	403.0(1)(2)(1)	2		L
al C II was a waste			•	
No further requirements.				
	•	•		
	•	,		
		,	. •	-
•		1.D.3, 5 & 8	Τ	T
Use proper sampling analysis (40 CFR Part 136) and	403.8(f)(2)(vi)	1.υ.3, 5 α δ		
inspection procedures				
Inspection procedures	•			
No further requirements.	•			•
•				
•			<del></del> -	
SIIIs	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12;		1
. Require, receive, and analyze reports from SIUs		II.E.1		
No further requirements.		•	٠.	-
No further 127011211				
		•		
		•		
		•		
t maliance and	403.8(f)(2)(vi)	1.F.3, 4 & 9		
5. Monitor to demonstrate continued compliance and		•		
resampling after violation(s)		•		
No further requirements.			-	
•	•			
	•			
	402.42(a)(1)8.(	(2) I.F.2 & 5		
6. Ensure CIUs report on all regulated pollutants at le	east 403.12(g)(1)&(	<u></u>		
was every 6 months				
No further requirements.		•		
TAD INVINCE		· ·		
·				•
U.				

## SECTION III: EVALUATION AND SUMMARY (Continued)

COMPLIANCE MONITORING (Continued)  Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months  No further requirements.  Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed	Rec.	Req.
COMPLIANCE MONITORING (Continued)  Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months  No further requirements.  Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed		
Ensure noncategorical SIUs self-monitor and report and regulated pollutants at least once every 6 months  No further requirements.  Require self-monitoring reports from CIUs to be signed  and certified and reports from SIUs to be signed		
No further requirements.  Require self-monitoring reports from CIUs to be signed  403.12(I); 403.6(a)(2)(ii)  And certified and reports from SIUs to be signed		
No further requirements.  Require self-monitoring reports from CIUs to be signed 403.12(I); 1.F.6 403.6(a)(2)(ii) and certified and reports from SIUs to be signed		
Require self-monitoring reports from ClUs to be signed  403.6(a)(2)(ii)  403.6(a)(2)(iii)		
Require self-monitoring reports from ClUs to be signed  403.6(a)(2)(ii)  403.6(a)(2)(iii)		
Require self-monitoring reports from ClUs to be signed  and certified and reports from SlUs to be signed	. 1	
and certified and reports from SIUs to be signed		
$J_{-}$		
No further requirements		
	<del></del>	
9. Receive notification of hazardous waste discharges 403.12(j)&(p) 1.F.10; II.D.3		
No further requirements.	•	
		.·
		•
F. ENFORCEMENT 1. Implement approved ERP 403.8(f)(5) 1.E.3; II.F.2		×

# SECTION III: EVALUATION AND SUMMARY (C. .tinued)

	Regulatory	Checklist	Action
Description	Citation	Question(s)	Rec. Req.
F. ENFORCEMENT (Continued)			
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1, 7 &	<u>                                   </u>
		9	
The city of Everett must develop compas necessary to bring dischargers lase narrative inspection report for r	pliance schedu	les in a tim	ely manner
as necessary to bring dischargers	back into con	ADLIGHEN CUM	In stouch I'm
Con mannador mora de la suit C	man (-1 1)	Thunke wil	" SHILLERED.
ave marative inspection report ton r	rore aetail.)		
	•		
		•	
4. Ensure IU compliance within 3 years of standards	403.6(b)	II.F.8	
effective date (or less than 3 years where required by			
standard)			
No further requirements.		•	
/	•		
5. Ensure new sources report on compliance with	403.12(d)	1.F.3	
appropriate standards within first 90 days of discharge			
No further requirements		•	
<b>√</b>	•		
		•	
G. ADDITIONAL EVALUATIONS	:		
O. ADDITIONAL LYALDALIONS			
		•	
		•	
			·
		•	

SECTION III COMPLETED BY: Doug Vintage	DATE: October 15th 2012
SECTION III COMPLETED BY.	
9	
TITLE: Environmental Engineer	TELEPHONE: 426 649 4025
TILE: Living Confermal 2 Miller	1222 110112

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