


( AMENDED ( 6.1

		State of Washington Department of Ecology Northwest Regional Office <b>WATER COMPLIANCE INSPECTION REPORT</b>			substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)	
Section A: National Data System Coding (i.e., PCS)						
Transaction Code <b>C</b> 2 <b>5</b>	NPDES # 3 <b>WA24490</b> 11 <i>WA 002 4490</i>	yr/mo/day 12 <b>11/12/06</b> <sup>17</sup> <b>(December 6<sup>th</sup>, 2011)</b>	Inspection Type 18 <b>P</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>1</b>	
Remarks						
Inspection work-days 67      69	Facility Self-Monitoring Evaluation Rating 70 <b>5</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	Reserved 73      74      75      80		
Section B: Facility Data						
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)  City of Everett Industrial Wastewater Pretreatment Program 3200 Cedar Street Everett, WA 98201			Entry Time/Date 9:30AM/December 6 <sup>th</sup> , 2011		Permit Effective Date September 1 <sup>st</sup> , 2009	
			Exit Time / Date 3:00PM/December 6 <sup>th</sup> , 2011		Permit Expiration Date October 1 <sup>st</sup> , 2015	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Jeff Kerwin (425) 257-8241 Gene Bennett (425) 257-8241			Other Facility Data			
Name, Address of Responsible Official/Title/Phone and Fax Number. Jeff Kerwin Industrial Wastewater Pretreatment Program 3200 Cedar Street, Everett, WA 98201 (425) 257-8241 Phone Number (425) 257-8241 Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)						
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)			
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention			
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia			
<input type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other			

(note: This amended 2011 Pretreatment 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.)

### Purpose of Inspection/Methodology

This inspection was conducted in order to evaluate the City of Everett's compliance with state and federal requirements related to administration of its delegated industrial wastewater pretreatment program. The inspection consisted of a review of permittee permit files, including permits, inspection

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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 biomedica 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

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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 sulfate 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 had occurred 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

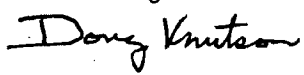
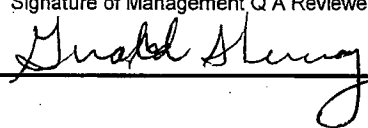
retained Dennis Group, LLC to "support our engineering requirements outlined in the *Compliance Plan*". The letter contained a compliance plan consisting of eight individual milestones and the estimated completion date for each milestone. Startup of the treatment system was associated with an estimated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

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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 	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 	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 Data System Coding (i.e., PCS)**

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

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

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

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

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

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

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

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

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

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

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

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

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

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

**Section B: Facility Data**

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

**Section C: Areas Evaluated During Inspection**

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

**Section D: Summary of Findings/Comments**

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

# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

## PCI CHECKLIST CONTENTS

Cover Page	IU File Evaluation
<input checked="" type="checkbox"/> Section I	Supplemental Data Review/Interview
<input checked="" type="checkbox"/> Section II	Evaluation and Summary
<input checked="" type="checkbox"/> Section III	
<input type="checkbox"/> Attachment A	Pretreatment Program Status Update
<input type="checkbox"/> Attachment B	Pretreatment Program Profile
<input type="checkbox"/> Attachment C	Worksheets
	<input type="checkbox"/> WENDB Data Entry Worksheet
	<input type="checkbox"/> RNC Worksheet
	<input type="checkbox"/> IU Site Visit Report Form (Optional)
	<input type="checkbox"/> File Review Worksheets (Optional)
Attachment D	Supporting Documentation

CA name and address:

City of Everett  
Industrial Wastewater Pretreatment Program  
3200 Cedar Street  
Everett, WA 98201

Date(s) of PCI

December 6<sup>th</sup>, 2011

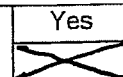
Period covered by PCI

October 1<sup>st</sup>, 2010 through  
September 30<sup>th</sup>, 2011

Yes

No

PIRT / DSS incorporated in NPDES permit?



### INSPECTOR (S)

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

### CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Jeff Kerwin	Industrial Pretreatment Program Manager	(425) 257-8241
Gene Bennett	Industrial Waste Inspector	(425) 257-8240
Don McKinney	Industrial Waste Inspector	(425) 257-8246

\*Identified program contact

# ACRONYM LIST

## Acronym

## Term

BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FTE	Full-time equivalent
FWA	Flow-weighted average
gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical review criteria
TTO	Total toxic organics
WENDB	Water Enforcement National Data Base



## SECTION I: IU FILE EVALUATION

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

NARRATIVE COMMENTS			
<b>FILE 7722</b> Industry name and address Naval Station Everett 2000 West Marine Drive Everett, WA 98207		Total flow (gpd) <del>750,000</del> 750,000 maximum	Process flow (gpd) 250,000
		Type of industry (products manufactured) Naval Homebase	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category	Compliance status <input checked="" type="checkbox"/> SNC (period: <u>3rd qtr 2011</u> ) <input checked="" type="checkbox"/> Noncompliance/corrected <input checked="" type="checkbox"/> Noncompliance/continuing	
<b>Comments</b> <ul style="list-style-type: none"> <li>• In SNC in July due to spill. Classification as SNC was determined in September, as stated in NDV/Required action letter sent September 16<sup>th</sup>, 2011.</li> <li>• Spill occurred on July 13, 2011 during comp water barge operations when an unknown volume of marine diesel fuel was discharged to the base sewer system. Due to an alarm not going off, as described by Navy, they were not aware that a spill had occurred.</li> <li>• At 2:00 PM on July 13<sup>th</sup>, a City of Everett Public Works crew preparing to TV a line at Pacific &amp; Chestnut identified alarms from their monitors for hydrogen sulfide, low oxygen, and flammable vapors.</li> <li>• Westwater personnel, upon their arrival at the portw plant, noticed petroleum odors. Significant amounts of oil were observed at the inlet to Aeration Cell Number One &amp; in the primary clarifiers buildings sump concentrator. Plant operators began oil recovery and cleanup activities. On July 14<sup>th</sup>, field crews began working upstream and industrial waste investigators contacted permitted facilities. On July 15<sup>th</sup>, the Navy contacted the City and indicated that it believed the Navy was the source.</li> </ul> <p>Notice of violation required submittal of a final narrative report (in addition to the report already made)</p>			

## SECTION I: IU FILE EVALUATION (Continued)

### NARRATIVE COMMENTS

FILE <u>7703</u> Industry name and address  Stock Pot, Inc. 1200 Merrill Creek Parkway Everett, WA 98203		Total flow (gpd)  376,000	Process flow (gpd)  350,000
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Applicable Federal category  N/A	
Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input checked="" type="checkbox"/> Noncompliance/continuing		Type of industry (products manufactured)  Soup manufacturing	
Comments  <div style="text-align: right; margin-right: 50px;">(but complying with compliance order.)</div> <p>The City of Everett worked with them informally resulting in many interim steps (e.g. installed upstream pH control in front of pretreatment system, balancing of flows, change of cleanup procedures). These steps did not achieve consistent compliance, so the City of Everett issued a Notice of Violation with an accompanying Administrative order.</p>			

### NARRATIVE COMMENTS

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

## SECTION I: IU FILE EVALUATION (Continued)

### NARRATIVE COMMENTS

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

### NARRATIVE COMMENTS

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

## SECTION I: IU EVALUATION (Continued)

Industry Name					<b>INSTRUCTIONS:</b> Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.	
File	File	File	File	File	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
7722	7703	___	___	___		
					<b>A. CA NOTIFICATION OF IU</b>	
OK	OK	___	___	___	1. Notification of classification or change in classification	403.8(f)(2)(iii)
OK	OK	___	___	___	2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<b>Comments</b>						

# SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
OK	OK				<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	403.8(f)(1)(iii)
OK	OK				1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
OK	OK				2. Control mechanism contents	
OK	OK				a. Statement of duration ( $\leq 5$ years)	
OK	OK				b. Statement of nontransferability	
OK	OK				c. Applicable effluent limits ( <u>local limits</u> , categorical standards)	
OK	OK				d. Self monitoring requirements	
OK	OK				• Identification of pollutants to be monitored	
OK	OK				• Sampling frequency	
OK	OK				• Sampling locations/discharge points	
OK	OK				• Sample types (grab or composite)	
OK	OK				• Reporting requirements	
OK	OK				• Record-keeping requirements	
OK	OK				e. Statement of applicable civil and criminal penalties	
OK	OK				f. Compliance schedules	
OK	OK				g. Notice of slug loading	
OK	OK				h. Notification of spills, bypasses, upsets, etc.	
OK	OK				i. Notification of significant change in discharge	
OK	OK				j. 24-hour notification of violation/resample requirement	
OK	OK				k. Slug discharge control plan requirement	

## Comments

① September 30<sup>th</sup>, 2009 - September 29<sup>th</sup>, 2014

② Metals, pH, BOD<sub>5</sub>, TSS, FOG, no polar FOG, closed cup flash point

③ Monthly

④ CCM Sample Tee & oil/water separator discharge pt.  
(Comp Water Collection & Management)

⑤ No compliance schedule in permit.

⑥ Part V.E - none required (anticipate that spill plan will cover spills)

⑦ Spill plan covered in Part IIIA. Spill Plan has implement within six months' requirements in permit.

⑧ July 1, 2011 - June 30, 2016

⑨ As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, C.N

pH, BOD<sub>5</sub>, TSS, Total FOG, FOG non-polar, closed cup flash point  
(pH & Flow have been their only violations)

⑩ monitoring for pH is continuous. pH limits are 5.0 to 11.0

⑪ Same in monitoring manual

⑫ metals composite, pH continuous, BOD<sub>5</sub>/TSS/FOG are 2/week

⑬ no compliance schedule in permit itself

⑭ slug discharge control plan required in III B (plan update) and IEB (implementation of plan).  
most recent slug plan is March 31, 2015

# SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>C. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>	
OK	OK				1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
OK	OK				a. Classification by category/subcategory	
OK	OK				b. Classification as new/existing source	
OK	OK				c. Application of limits for all regulated pollutants	
OK	OK				3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii) 403.6(c)
OK	OK				4. Calculation and application of production based-standards	403.6(d)&(e)
OK	OK				5. Calculation and application of CWF or FWA	403.8(f)(1)(ii)
OK	OK				6. Application of most stringent limit	
Comments ① non-categorical						

# SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>D. CA COMPLIANCE MONITORING</b>	
					Sampling	403.8(f)(2)(v)
OK	OK				1. Sampling (once a year)	
OK	OK				2. Sampling at frequency specified in approved program	403.8(f)(2)(vi)
OK	OK				3. Documentation of sampling activities	
OK	OK				4. Analysis for all regulated parameters	403.8(f)(2)(vi)
OK	OK				5. Appropriate analytical methods (40 CFR Part 136)	
					Inspection	403.8(f)(2)(v)
OK	OK				6. Inspection (once a year)	
OK	OK				7. Inspection at frequency specified in approved program	403.8(f)(2)(vi)
OK	OK				8. Documentation of inspection activities	403.8(f)(2)(v)
OK	OK				9. Evaluation of need for slug discharge control plan	
<p>Comments</p> <p>① 03/20/11 Sample Date for treatment plant sample  03/14/11 Sample Date for treatment plant sample  05/12/11 Sample Date barge (only sample one sample as only take one each six months and there were normally expect more than one discharge in second six months. The reason for no discharge second discharge in the second six months from the barge is that barge water is now being sent through treatment plant. note: The barge comp water was sent through cyclone.</p> <p>② October 24<sup>th</sup>, 2011 and March 29<sup>th</sup>, 2011.</p> <p>③ 09/28/2011/09/22/2011/06/16/2011/06/17/2011/ 09/15/2010/09/16/2010/04/20/2010/04/21/2010  12/02/2009/12/03/2009/ 04/06/2009/04/07/2009.</p> <p>④ Nov 15, 2011, June 11, 2011, Sept 14, 2010, April 22, 2010, June 15, 2009  Oct 24, 2009, June 15, 2009</p>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vi)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vi)
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Comments</div>						



# SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>F. IU COMPLIANCE STATUS</b>	
					<b>Self-Monitoring and Reporting</b>	
OK	OK				1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
OK	OK				2. Analysis of all required pollutants	403.12(g)(1)&(h)
OK	OK				3. Submission of BMR/90-day report	403.12(b) &(d)
OK	OK				4. Periodic self monitoring reports	403.12(e)&(h)
OK	OK				5. Reporting all required pollutants	403.12(g)(1)&(h)
OK	OK				6. Signatory/certification of reports	403.12(i)
OK	OK				7. Submission of compliance schedule reports by required dates	403.12(c)
OK	OK				8. Notification within 24-hours of becoming aware of violations:	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
OK	OK				9. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
OK	OK				10. Notification of hazardous waste discharge	403.12(j)&(p)
OK	OK				11. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
OK	OK				12. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.						
					<b>Discharge</b>	
					13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
					a. Chronic violations	
					b. TRC	403.5(a)(1)
					c. Pass through or interference	403.12(f)
					• Spill or slug load	
					d. Other discharge violations (specify)	
					<b>Reporting</b>	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments						
① No compliance schedule in permit.						
② Navy asserts that it was not aware of spill.						
③ resampling not conducted as Navy has discontinued discharging through that sample point.						
④ Slug discharge plan preparation/submitted not required in permit.						
⑤ Navy asserts it was not aware of spill.						
⑥ Submitted a Compliance Plan Milestone Letter on 24, 2011 & another on October 20, 2011.						
⑦ No Slugs or accidental spills. Notifications for pH violations were made in a timely manner by Stockpot by e-mail.						
⑧ March 31, 2010 (Slug Plan Update.)						
⑨ SNC status of Stockpot Foods: Due to the lack of a TRC factor for pH, and the continuous monitoring method (i.e. requirement) Stockpot Foods is probably not classifiable as being in SNC under 40CFR Part 403(f)(2)(viii).						

## SECTION I: IU EVALUATION (Continued)

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

SECTION I COMPLETED BY: _____  <div style="text-align: right;">TITLE: _____</div>	DATE: _____  TELEPHONE: _____
---	-------------------------------------

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

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

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

If yes, describe.

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

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

If yes, describe.

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

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

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

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

- monthly review of business licenses
- coordinate with Engineering & Public Services on new building permits
- drive-around surveys
- coordinate with building inspectors
- periodically review water use records

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

a.	21	SIUs (as defined by the CA) [WENDB - SIUs]
	9	CIUs (including zero-discharging CIUs)[WENDB - CIUs]
	3	Zero-discharging CIUs
	12	Noncategorical SIUs (including zero-discharging noncat. SIUs)
	0	Zero-discharger noncategorical SIUs
b.	8	Other regulated noncategorical IUs (specify)
c.	29	TOTAL

(discharge authorizations,  
mainly construction dewatering  
and ground water cleanup)

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

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

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism ? 21

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

If any, explain.

0

2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism ? [RNC - II] 0

If any, explain.

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

#### D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

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

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW ? ☐ Yes ☒ No

The City of Everett ordinance does not allow discharge of hauled wastes.

If yes, identify the industries.

If no, explain.

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

If yes, identify and explain.

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

## E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

### 1. Identify the following.

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

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

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

0 ****	0	%
0	0	%
0	0	%

If any, explain.

\* except for zero dischargers & NSCIU for which frequency of inspection is one per year  
 \*\* except for zero dischargers (0) and NSCIU (1)  
 \*\*\* except non discharging CIUs & NSCIUs annually  
 \*\*\*\* except zero dischargers not sampled.

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

### F. ENFORCEMENT

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

- a. Notice or letter of violation
- b. Administrative orders
- c. Administrative fines
- d. Show cause hearings
- e. Compliance schedules
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of services
- j. Other (specify)

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

Explain if appropriate

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

N/A	Yes	No
	<del>X</del>	*

\* However, the City of Everett, in the case of Stockpot Foods appears to have made excessive use the discretionary provisions of its Enforcement Response Plan. (See narrative portion of inspection report for greater detail.)

3. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period: October 1, 2010 - September 30, 2011

	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
1*	%	Self-monitoring requirements	POTW
	%	Pretreatment compliance schedules	EPA

Navy due to spill:

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

Evaluation Period: 2011 (calendar year)

Number of SIUs: 12



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

**F. ENFORCEMENT (Continued)**

Yes

No

X

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)]

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

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

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

[illegible]

\* investigating corrosion possibly due to Navy discharges of salty water (absent hulling tanks, intake water)  
 \*\* Navy desal. plant

\*\* Navy diesel spill

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

Notice of Violation issued to Navy, & costs calculated & recovered.

Yes

No

X

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

<b>F. ENFORCEMENT (Continued)</b>		/									
7.	a. How many SIUs are on compliance schedules?										
	b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).										
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 60%;">SIU</th> <th style="width: 40%;">End Date</th> </tr> <tr> <td style="padding: 5px;">stockpot</td> <td style="padding: 5px;">August 21, 2012</td> </tr> <tr> <td style="height: 20px;"></td> <td></td> </tr> <tr> <td style="height: 20px;"></td> <td></td> </tr> </table>	SIU	End Date	stockpot	August 21, 2012						
SIU	End Date										
stockpot	August 21, 2012										
		Yes	No								
8.	Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] If yes, identify and explain.		X								
		Yes	No								
9.	Did any SIUs return to compliance by any of the following? [RNC -I] a. Within 90 days b. Within the time specified in the ERP c. Through a compliance schedule component (including legal authority, local limits, DSS requirements, etc.) ?	X									
		X									
			X								
<b>G. ADDITIONAL EVALUATIONS</b>											

SECTION II COMPLETED BY: <u>Doug Krutem</u> TITLE: <u>Environmental Engineer</u>	DATE: <u>October 15<sup>th</sup>, 2012</u> TELEPHONE:
POTW REPRESENTATIVE PROVIDING RESPONSES:	DATE: TELEPHONE:

### SECTION III: EVALUATION AND SUMMARY

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

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>				
1. Notify of program modification <i>No further requirements.</i>	403.18	II.A		
<b>B. IU CHARACTERIZATION</b>				
1. Identify and locate all SIUs <i>No further requirements.</i>	403.8(f)(2)(i)	II.B		
2. Identify the character and volume of pollutants contributed to POTW by IUs <i>No further requirements.</i>	403.8(f)(2)(ii)	II.B.1; II.E.1		
<b>C. CONTROL MECHANISM EVALUATION</b>				
1. Issue individual control mechanisms to all SIUs <i>No further requirements.</i>	403.8(f)(1)(iii)	I.B.1; II.C.1 & 2		

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

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>C. CONTROL MECHANISM EVALUATION (Continued)</b>				
2. Ensure control mechanisms contents include:	403.8(f)(1)(iii)	I.B.2.a-j		
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <ul style="list-style-type: none"> <li>a. A statement of duration</li> <li>b. A statement of nontransferability</li> <li>c. Effluent limits</li> <li>d. Self - monitoring requirements</li> <li>e. A statement of penalties</li> </ul> </div> <div style="width: 45%;"> <ul style="list-style-type: none"> <li>f. Compliance schedules</li> <li>g. Notice of slug loading</li> <li>h. Notification of spills, bypasses, upsets, etc.</li> <li>i. Notification of significant change in discharge</li> <li>j. 24-hour notification of violation/resample requirement</li> </ul> </div> </div> <p style="margin-top: 10px;"><i>No further requirements.</i></p>				
<b>D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>				
1. Apply all applicable pretreatment standards	403.8(f)(1)(iii)	I.B.2.a-j		
<p><i>No further requirements.</i></p>				
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(1)(ii); 403.5	I.C.1 - 6; II.D.2		
<p><i>No further requirements.</i></p>				
<b>E. COMPLIANCE MONITORING</b>				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.D.2 & 7; II.E.1		
<p><i>No further requirements.</i></p>				

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

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
2. Inspect and sample each SIU once a year <i>No further requirements.</i>	403.8(f)(2)(v)	I.D.1 & 6; II.E.1 & 2		
3. Use proper sampling analysis (40 CFR Part 136) and inspection procedures <i>No further requirements.</i>	403.8(f)(2)(vi)	I.D.3, 5 & 8		
4. Require, receive, and analyze reports from SIUs <i>No further requirements.</i>	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12; II.E.1		
5. Monitor to demonstrate continued compliance and resampling after violation(s) <i>No further requirements.</i>	403.8(f)(2)(vi)	I.F.3, 4 & 9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months <i>No further requirements.</i>	403.12(g)(1)&(2)	I.F.2 & 5		

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

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months  <i>No further requirements.</i>	403.12(h)	I.F.2 & 5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed  <i>No further requirements</i>	403.12(i); 403.6(a)(2)(ii)	I.F.6		
9. Receive notification of hazardous waste discharges  <i>No further requirements.</i>	403.12(j)&(p)	I.F.10; II.D.3		
<b>F. ENFORCEMENT</b>				
1. Implement approved ERP  <i>The City of Everett must take enforcement action, and escalate enforcement as necessary, in a timely manner, to bring dischargers back into compliance with standards. (See narrative inspection report for more detail.)</i>	403.8(f)(5)	I.E.3; II.F.2		X
2. Annually publish a list of IUs in SNC  <i>No further requirements.</i>	403.8(f)(2)(vii)	I.E.5; II.F.4		

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

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>F. ENFORCEMENT (Continued)</b>				
3. Develop IU compliance schedules.	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1, 7 & 9		<input checked="" type="checkbox"/>
<p><i>The City of Everett must develop compliance schedules in a timely manner, as necessary to bring dischargers back into compliance with standards. (See narrative inspection report for more detail.)</i></p>				
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	II.F.8		
<p><i>No further requirements.</i></p>				
5. Ensure new sources report on compliance with appropriate standards within first 90 days of discharge	403.12(d)	I.F.3		
<p><i>No further requirements</i></p>				
<b>G. ADDITIONAL EVALUATIONS</b>				

SECTION III COMPLETED BY: <i>Doug Vintson</i>	DATE: <i>October 15<sup>th</sup>, 2012</i>
TITLE: <i>Environmental Engineer</i>	TELEPHONE: <i>425 649 7025</i>

