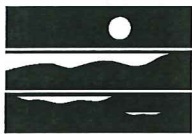


11/06 	State of Washington Department of Ecology Northwest Regional Office <b>WATER COMPLIANCE INSPECTION REPORT</b>	substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (Last file update 12-95.)
Section A: National Data System Coding (i.e., PCS)		
Transaction Code 1 <b>N</b> 2 <b>5</b> 3	NPDES # <b>WA0024490</b>	yr/mo/day <b>17/12/19</b> <b>(December 19, 2017)</b>
Inspection Type <b>1G8</b>		Inspector <b>19 S</b>
Fac Type <b>201</b>		
Remarks		
Inspection work days 67    69	Facility Self-Monitoring Evaluation Rating 70 <b>5</b>	BI    QA    Reserved 71 <b>N</b> 72 <b>N</b> 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 9:00 AM December 19, 2017  Exit Time / Date 3:00 PM December 19, 2017
Permit Effective and Expiration Date:  November 1, 2015 October 30, 2020		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Kerwin, Pretreatment Program Manager, (425) 257-8241 Gene Bennett, Industrial Inspector, (425) 257-8249		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number.  Dave Davis, Public Works Director  Phone Number Fax 425 257 8800 Contacted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)		
<input checked="" type="checkbox"/> Permit <input checked="" type="checkbox"/> Records/Reports <input type="checkbox"/> Facility Site Review <input checked="" type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Flow Measurement <input checked="" type="checkbox"/> Self-Monitoring Program <input type="checkbox"/> Compliance Schedules <input type="checkbox"/> Laboratory	<input type="checkbox"/> Operations&Maint. <input type="checkbox"/> Sludge Handling/Disposal <input checked="" type="checkbox"/> Pretreatment <input type="checkbox"/> Storm Water  <input type="checkbox"/> CSO/SSO (Sewer Overflow) <input type="checkbox"/> Pollution Prevention <input type="checkbox"/> Multimedia <input type="checkbox"/> other
Section D: Summary of Findings/Comments		

### Purpose of Audit/Methodology

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

The Department of Ecology conducts a yearly pretreatment compliance inspection (PCI) of the City of Everett's (the City) Industrial Wastewater Pretreatment Program. Ecology conducts a pretreatment compliance audit (PCA) at least once per the five year NPDES permit cycle of the City. This audit was conducted on December 19, 2017 by Biniam Zelelow, Ecology NWRO Pretreatment Engineer.

The City operates one wastewater treatment plant – Everett Water Pollution Control Facility – and has interjurisdictional agreements with Mukilteo, Alderwood, and Silverlake Water Districts.

The most recent pretreatment program audit and inspection were conducted in December 2014 and December 2015, WA Department of Ecology inspected by Biniam Zelelow

respectively. The determination of the audit and the inspection was that the City was complying with the terms and provisions of the General Pretreatment Regulations of the National Pretreatment Program.

### **Summary of Findings of this pretreatment compliance audit (PCA)**

This PCA examined the City's legal authority, IU control mechanisms, compliance monitoring, and enforcement and determined that **the City continues to perform exceptionally well in implementing all national pretreatment standards and requirements** in addition to any more stringent local requirements necessary to protect site-specific conditions of the Everett Water Pollution Control Facility (EWPCF) and its collection system.

There were no major changes in IU control mechanisms. The Pretreatment Program does not issue or administer general control mechanisms. This task is performed by the collections system unit of the City.

### **Pretreatment Program Status, Pretreatment Program Profile, and Legal Review Checklist**

Ecology completed Attachment A (Pretreatment Program Status) of EPA's 2010 document "Control Authority Pretreatment Audit Checklist and Instructions." Ecology requested for the City to complete Attachment B (Pretreatment Program Profile) and Attachment C (Legal Review Checklist).

The completed forms confirm that the POTW is complying with the legal authority requirements of 40 CFR Part 403. The completed forms are attached with this PCA report.

### **IU Site Visit**

As part of this PCA, Ecology requested for the City of Everett to arrange a pretreatment compliance inspection with Umbra Cuscinetti, Inc., a categorical significant industrial user (40 CFR 433.17) which is engaged in the business of manufacturing aircraft parts, primarily for Boeing. The facility mainly manufactures gear and shaft products with the main categorical processes being an abrasive (garnet) waterjet cutting of sector gears, a NITAL (nitric acid/alcohol) etch inspection, and LPI (liquid penetrant inspection). The characteristics of the wastewater is such that the only pretreatment required is pH neutralization.

Ecology identified Umbra Cuscinetti to be a suitable facility for a joint inspection with the City's inspector, Gene Bennett, which was conducted on December 20, 2017, the next day to the PCA. The facility was selected based on EPA's suggested criteria to use in selecting IUs to visit. The purpose of the visit was to evaluate accurate categorization of the facility by the City, identify discrepancies or deficiencies (if any) in CA personnel's inspection or sampling procedures, determine adequacy of pretreatment, and verify file information.

Attachment D of EPA's 2010 document "Control Authority Pretreatment Audit Checklist and Instructions" was used to document the findings of this inspection. The completed form is attached with this report.

### **IU File Review**

The Department of Ecology Inspector reviewed three industrial user permittee files during this Pretreatment Compliance Audit, those for Jamco America Inc., Stockpot, Inc. and Umbra Cuscinetti, Inc. The permits were current and contained all the necessary provisions. The permit files were complete and contained the required number of control authority sampling records and inspection records. The City of Everett normally inspects and samples each significant industrial user at least two times per year.

The files reviewed contained all the relevant information: Self-monitoring reports, the City's sampling results, inspection reports, enforcement files when applicable, permits and permit application, and slug discharge control plans, when applicable. The industries listed above are categorized properly in accordance with their activities and the nature and means of generation of wastewater as promulgated in 40 CFR Parts 406-471. The categorical limits set were also in agreement with those list in 40 CFR Part 406-471. Where applicable, the City local limits are imposed and are more stringent than the federal standards.

### **List of Significant Industrial Users**

The City of Everett provided the Ecology auditor with a list of 23 Industrial users that were either CIU or SIU, or both in 2017. See table below. Ametech was listed as an SIU in the 2016 annual report but the company was closed in September 2017 and thus the permit has been cancelled.

Industry	Category: 40 CFR Part
Achilles USA	463
Airport Road Transfer Station	403
Ametech - <b>Closed in September 2017</b>	NA
Aramark	403
AvtechTyee	433, Zero Discharge
Blue Streak Finishers	433
Boeing	433
Boeing Electrical Response Center	433, Zero Discharge
Cathcart Landfill	403
Cintas Industrial Laundry	403
Community Transit Bus (Kasch Park)	403
Community Transit Bus (Hardeson Road)	403
Dura Coatings	433, Zero Discharge
Eckstrom Industries, Inc.	433, NSCIU
Everett Landfill	403
Fluke Corporation (Seaway Blvd)	433
JAMCO America Inc.	433, Zero Discharge
Naval Station Everett	403
Port Chatham/Icicle Seafoods	403
Rail Makers NW	433, NSCIU
Shin Nippon Bioengineering Laboratories	403
Stockpot, Inc.	403
Umbra Cuscinetti	433
UTC Aerospace Systems	433, Zero Discharge

### Compliance and Enforcement

In 2017, there were no reported noncompliance from any of the permitted IU's from the self-monitoring discharge reports. The City's inspections and sampling also showed that all the IUs complied with their special and general conditions of their permits.

The following SIUs were in 100% compliance with Pretreatment Standards and Requirements in 2017.

Industry	Category	Fully compliant?
Achilles	463	Yes
Airport Road Transfer Station	403	Yes
Aramark	403	Yes
Avtech Tyee	433, Zero Discharge	Yes
Boeing	433	Yes
Boeing ERC	433, Zero Discharge	Yes
Cathcart	403	Yes
Cintas	403	Yes
Community Transit Kasch Park	403	Yes
Dura Coatings	433, Zero Discharge	Yes
Eckstrom Industries, Inc	433, NSCIU	Yes
JAMCO	433	Yes
Railmakers	433, NSCIU	Yes
StockPot	403	Yes
Umbra Cuscinetti	433	Yes
UTAS	433, Zero Discharge	Yes

During the interview, the City staff indicated that there were no major activities related to enforcement as there were no significant noncompliance. Hence, there were no administrative orders or civil penalties related to pretreatment or industrial users.

### **Major Changes at the Treatment Plant during this NPDES Permit Cycle**

At the treatment plant, there are 3 major changes anticipated during this permit cycle but none due to pretreatment issues:

1. Replace the chlorine building, upsize the emergency generator to enable disinfection and effluent pumping, and make outfall vault/manhole/piping improvements.
2. Add an emergency generator to power the Headworks CSO bar screen and essential Admin Bldg/Laboratory equipment.
3. Replace the media in trickling filters #1 and #2.

### **The City's Inspections and Sampling of SIU's**

The program inspected and sampled each SIU twice in the calendar year 2017.

In reviewing IU files, the City's sampling events are compliant with requirements of 40 CFR Part 403.8 (f) (2) (v) for inspection and sampling of each SIU's effluent at least once a year. The self-monitoring program seems to also be working very well with appropriate ERP for violators of this permit condition in the City's discharge permits.

### **Septage Monitoring**

The City's Ordinance doesn't allow trucked haulage except for domestic septage.

### **Pretreatment Program Components in the Process of Modification**

The City is not conducting any program modifications at this time.

The most recent changes to the pretreatment program include the City's Enforcement Response Plan and its Industrial user survey procedures which were modified in 2015. At the time of the 2013 Pretreatment Compliance Inspection (December 2013), the Department of Ecology requested, in response to a USEPA Region 10 request, that the City of Everett review its Enforcement Response Plan and related provisions of its ordinance. The City of Everett completed its review of its Enforcement Response Plan and undertook modifications of the Enforcement Response Plan. The City of Everett also reviewed its Industrial User Survey Procedures and made necessary changes. The Department of Ecology requested the City of Everett to submit the proposed revised Enforcement Response Plan and Industrial User Survey Procedures no later than October 30, 2015. The City of Everett submitted its Enforcement Response Plan (ERP) and Industrial Survey Procedures on October 10, 2015. Ecology approved both submittals on January 11, 2016.

### **Dental Office Point Source Category**

On June 14, 2017, EPA published a newly promulgated pretreatment rule for dental dischargers. In this rule, EPA concluded that requiring dental offices to remove mercury through relatively low-cost and readily available amalgam separators and BMPs makes sense. Capturing mercury-laden waste where it is created prevents it from being released into the environment. This final rule controls mercury discharges to POTWs by establishing a performance standard for amalgam process wastewater based on the use of amalgam separator technology. The rule also requires dental dischargers to adopt two BMPs: one which prohibits the discharge of waste amalgam to a POTW and the other which prohibits the use of oxidizing or acidic cleaners (when cleaning dental unit water lines such as chair-side traps and vacuum lines) that may lead to the dissolution of solid mercury.

The City initially surveyed all the dental offices (approximately 80) in Everett in 2015 but due to the lack of concrete

national guidance at that time, the City did not continue with the project in full force as it had started. With the newly promulgated 40 CFR Part 441 now in effect since the past summer (82 FR 27176), the City will need to survey all dental dischargers and inspect as many of them as time and resources allow. Existing dental offices that are subject to 40 CFR Part 441 must achieve the pretreatment standards listed in 40 CFR Part 441.30 PSES by July 14, 2020 and the reporting and recording keeping requirements of 40 CFR Part 441.50 by October 12, 2020 or no later than 90 days after a transfer of ownership. New sources subject to this part must comply with the requirements of 40 CFR Part 441.40 PSNS as of July 14, 2017 and the reporting and recording keeping requirements of 40 CFR Part 441.50 within 90 days of introducing wastewater into EWPCF.

#### Technical Assistance Rendered to other Pretreatment Programs

The City of Everett pretreatment program's Gene Bennett owns and administers a discussion forum for Pretreatment Coordinators in Yahoo! Groups. Puget Sound area pretreatment coordinators contribute to and gain valuable information from this national list of over 2600 pretreatment coordinators. The Department of Ecology greatly appreciates the assistance which the City of Everett pretreatment program has rendered to other cities in various forms.


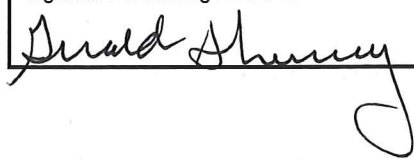
#### Conclusion

The Department of Ecology has determined that the City of Everett is operating its pretreatment program in compliance with state and federal regulatory requirements. The timeliness and magnitude of the City's enforcement actions greatly improved in 2015 and 2016. Since the City updated its ERP in 2016, many facilities saw escalating enforcement actions including Community Transit, Shin Nippon Bioengineering Laboratories, and StockPot Foods, Inc. As a result of this, the aforementioned SIUs were brought into compliance and no longer held significant noncompliance (SNC) status in 2017 nor were any other SIUs in SNC in 2017.

Finally, the City will need to get up to speed as soon as possible in implementing the dental rule as new sources subject to that part (40 CFR 441) need to comply as of July 14, 2017

*Recommendations – Ecology recommends for the City to consider the following:*

- Develop a checklist or a form for use during IU site visits in order to make the inspection process more systematic
- Provide a trend of biosolids quality in annual reports in order to continually evaluate adequacy of local limits
- Conduct a comprehensive industrial user survey with the 2020 NPDES permit renewal application

Name(s) and Signatures of Inspector(s) Biniam Zelelow 	Agency/Office/Telephone WA Dept. of Ecology/NWRO/(425)649-7127 3190 - 160th SE, Bellevue, WA 98008-5452	Date January 18, 2018
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 Jan 22, 2018

**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.

## CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

### AUDIT CHECKLIST CONTENTS

Cover Page and Acronym/Abbreviation List

Section I

Data Review

Section II

IU File Evaluation

Section III

Observations and Concerns



Attachment A

Pretreatment Program Status Update



Attachment B

Pretreatment Program Profile



Attachment C

Legal Authority Review Checklist

Attachment D

Worksheets



Site Visit Data Sheet



WENDB Data Entry Worksheet



PCA Required ICIS Data Elements Worksheet



RNC Worksheet

Attachment D

Supporting Documentation

Control Authority (CA) name and address			Date(s) of audit	
City of Everett Industrial Wastewater Pretreatment Program 3200 Cedar Street Everett, WA 98201			December 19, 2017	
Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Everett Water Pollution Control Facility	WA0024490	11/01/2015	10/30/2020	Yes
<b>AUDITOR(S)</b>				
Name	Title/Affiliation	Telephone Number	Email Address	
Biniam Zetelow	Pretreatment Engineer - Ecology	425. 649-7127	bzet461@ecy-wa.gov	
<b>CA REPRESENTATIVE(S)</b>				
Name	Title/Affiliation	Telephone Number	Email Address	
Jeff Kerwin	Industrial Waste Program Mgr	425.257.8241	JKerwin@everettwa.gov	
Gene Bennett	Industrial Waste Inspector	425.257.8240	GBennett@everettwa.gov	

\*Identified program contact

## ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	<i>Code of Federal Regulations</i>
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

### ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

### GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

## SECTION I: DATA REVIEW

**INSTRUCTIONS:** Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

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

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	X

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

Yes	No
	X

If yes, describe.

- The City always gathers data for local limits updates.
- The City identified some minor edits to be made to the Ordinance, mainly typos.

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?

Yes	No
	X

If yes, describe.

# SECTION I: DATA REVIEW (CONTINUED)

## A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)] *The City does not sample for CIUs.*
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

Yes	No
X	
X	
X	
X	
X	
X	
	X
X	
X	

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

Yes	No
X	

If yes, check which ones.

X	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
X	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
✓	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
✓	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
✓	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
✓	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
✓	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

# SECTION I: DATA REVIEW (CONTINUED)

## A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

2. a. Are there any planned changes to the POTW's treatment plant(s)?

Yes

No

There are three major changes anticipated during this permit cycle.

If yes, describe.

1. Replace the chlorine building, upsizing the emergency generator to enable disinfection and pumping and, make out fall vault/manhole/piping improvements.
2. Add an emergency generator to power the headworks CSO barscreen and essential admin building/laboratory equipment.
3. Replace the media in trickling filters #1 and #2.

Yes

No

b. Are these changes to the treatment plant(s) due to pretreatment issues?

If yes, what were the issues?

NO

## B. LEGAL AUTHORITY [403.8(f)(1)]

1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes

No

If yes, complete questions b–e.

b. List the contributing jurisdictions.

Silverlake Water District  
Alderwood water and wastewater District  
Mukilteo water and wastewater District

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes

No

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		X
Notifying IUs of requirements	X	
Issuance of control mechanisms	X	
Receiving and reviewing IU reports	X	
Conducting inspections	X	
Conducting compliance monitoring	X	
Enforcement of Pretreatment Standards and Requirements	X	

**SECTION I: DATA REVIEW (CONTINUED)**

**B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)**

e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?

Yes

No

X

If yes, explain.

2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?

Yes

No

X

b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?

X

c. Did the CA update its procedures and ERP to implement the changes in its SUO?

X

Explain

X contributing jurisdictions reference City of Everett's pretreatment Ordinance. Therefore, a change in the local sewer jurisdictions' ordinance was not necessary.

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes

No

X

If yes, explain.

## SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

*The same as in 40 CFR 403.3 (v) (1)*

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU*?

*The same as in 40 CFR 403 although the CA doesn't have middle-tier CIUs.*

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

*The same as in 40 CFR 403.3 (v) (2)*

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Discuss any problems. *None*

*SIUs are identified:*

- *by using IWSs periodically updated*
- *IU inspections*
- *Information provided in permit applications*

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

*The city updates its IWS continuously*

- *continuous evaluation and updates*
- *The program receive information from the Clerk's office regarding new businesses on a monthly basis.*
- *Driving around during inspection*

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

- *Regular discharge monitoring reports (DMRs)*
- *Inspections by the City's three inspectors*
- *Sampling of IUs by the City.*

# SECTION I: DATA REVIEW (CONTINUED)

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

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

a.	23	SIUs (as defined by the CA) [WENDB – SIUs, RIDE – SIUs]
	6	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUs, RIDE – CIUs]
	0	Middle-tier CIUs** (specify below)
	11	Noncategorical SIUs
b.	6	Other regulated nonsignificant IUs (specify) - GW cleanup sites - other non-significant, non CIU Industrial processes.
	6	Noncategorical nonsignificant IUs
	2	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
	4	Zero-discharging CIUs** (specify below)
c.	29	TOTAL

\*\* The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.

List of NSCIUs and zero-discharging CIUs:

- NSCIU:
  - Eckstrom Industries, Inc.
  - Railmakers
- Zero Discharging CIUs:
  - Artech Tyee
  - Dura Coatings
  - UTC Aerospace Systems
  - Boeing Electrical Response Center

List of Middle-Tier CIUs:

Not applicable

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity?

BOD5 : \*830 lb/day  
 TSS : 8.90 lb/day } source → version 5 WA0024490 fact sheet Table 13

List of SIUs with general control mechanisms:

The city doesn't use general control mechanisms. construction dewatering permits are administered by the city's sewer collection systems unit.

# SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	0	0	%
b. Has the CA implemented any general control mechanisms?	NO.		
c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism:	N/A		
d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	0		
If any, explain.			
2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?	Yes		
b. How are control mechanisms (specifically limits) developed for these facilities? Discuss	The city uses their local limits in its ordinance to regulate such facilities. - Everett Landfill and Cathcart are covered as such.		
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	Yes	No	
b. Is any of the waste hazardous as defined by RCRA?	X		
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		X	
d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]	The CA only accepts domestic sewage by haulage. - There are designated discharge points - permits are issued to septage haulers.		

## SECTION I: DATA REVIEW (CONTINUED)

### E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

The city's ordinance authorizes only domestic septage hauling to the Ewpcf. Local limits do not apply but the city collects samples for D.C.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

- subscription to the federal register, attending NACWA conferences and pretreatment workshops. Gene Bennett owns and admin.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

Sters Yahoo Groups - pretreatment.

a. For what pollutants have local limits been set?

As (0.5), Ag (0.49), Cd (0.24), Cr (50), Cu (3.0), Hg (0.1), Ni (2.83), Pb (1.89), Zn (4.0), non poller FOG (200) all in mg/L. pH is set in permits on a case-by-case bases but in no case lower than 5.0

b. How were these pollutants selected?

The selection was based on discussions between Ecology & EPA.

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

- Water quality criteria for: Cu, Hg, Ag, CN
- Sludge quality for: As, Cd, Cr, Pb, Ni
- Inhibition of biological processes: Zn

d. Which allocation method(s) were used?

Uniform allocation to all IUs.

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

Daily maximum.

f. When was the CA's last local limits evaluation? What was the approval date?

July 1993. Local limits are evaluated annually to make sure they are still protective of the Ewpcf.

g. Has the CA identified any pollutants of concern beyond those in its local limits?

If yes, how has this been addressed?

Yes	No
	X

## SECTION I: DATA REVIEW (CONTINUED)

### E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

None.

### F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

The City uses EPA's "Industrial User Permitting Guidance Manual" - September 2012.

b. Is the frequency established above more, less, or the same as required?

Explain any difference.

The same as required.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

NO.

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

(Define the 12-month period 1/1/2017 to 12/31/2017)

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

0	0	%
---	---	---

b. Not sampled at least once [RIDE – SIUs Not Sampled]

0	0	%
---	---	---

c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]

0	0	%
---	---	---

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

# SECTION I: DATA REVIEW (CONTINUED)

## F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC - II]

SNC Evaluation Period 1/1/2017 - 12/31/2017

<u>0</u>	%	Applicable Pretreatment Standards and reporting requirements
<u>0</u>	%	Self-monitoring requirements
<u>0</u>	%	Pretreatment compliance schedule(s)

\*SNC defined by:

POTW	<input checked="" type="checkbox"/>
EPA	<input checked="" type="checkbox"/>

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs. NO

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: 1/1/2017 - 12/31/2017

Number of SIUs: 16

Names of SIUs: Umbra Cuscinetti, UTAS, Achilles, Airport Road transfer station, Anmark, Avtech Tree, Boeing, Boeing ERC, Cathcart, Cintas, community transit - Rain Park, Dura coatings, Eckstrom Industries, Jamco, Railmakers, Stockport

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

All of the above - The PCA involved a visit to Umbra Cuscinetti (an SIU) owned by the city. Inspection included all items listed above and is standard with the city's inspection practices.  
Request a copy of the CA's inspection form, if applicable.  
The city doesn't use a form but the auditor recommended for the city to develop a form & check list.

5. Who performs the CA's compliance monitoring analysis?

- Metals, TSS, BODs, flashpoint
- Cyanide
- Organics
- Other (specify) FOG

Performed by: CA/Contract Laboratory Name

<u>City of Everett</u>
<u>Analytical Resources, Inc (ARI)</u>
<u>ARI</u>
<u>ARI</u>

## SECTION I: DATA REVIEW (CONTINUED)

### F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	✓	Sample Splits	✓
Chain-of-custody forms	✓	Sample Blanks	✓
New Sampling Tubes - freshly cleaned not new	✓	Sample Spikes	✓
Field Blanks	✓	Other:	
Other:			

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

None

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA?

[403.12(j)&(p)]

Yes

No

X

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

Not: location is included in the permit boilerplate under section III - summary of Reports. Notification is once per permit cycle.

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

At least once per year and during inspections. The need for slug control is evaluated based on new processes and discharge practices and efficiency of pretreatment system.

List SIUs required to have a slug discharge control plan:

Yes

No

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

X

If not, which SIUs have not been evaluated?

# SECTION I: DATA REVIEW (CONTINUED)

## G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

The same as 40 CFR 403.8 (f)(2)(viii) - an SNC is a violation of paragraphs (f)(2)(viii) (c), (d), or (h).

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

Yes

b. Has the ERP been approved by the Approval Authority?

Yes

c. Does the ERP describe how the CA will investigate instances of noncompliance?

Yes

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response?

Yes

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

Yes

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

Yes

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

Yes. It was modified in early 2016 and is now more effective.

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

Yes

No

b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.

X

X

(1) community Transit - Kasch Park > end date 4/19/2018  
- Kardeson

(2) Shin Nippon Bioengineering Labs: end date 1/26/2018

# SECTION I: DATA REVIEW (CONTINUED)

## G. ENFORCEMENT (continued)

4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]

Yes

No

X

There were no SIUs in SNC in 2017.

If yes, attach a copy.

If no, explain.

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?

0

b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?

0

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

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

Yes	No	Unknown	Explain
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		

# SECTION I: DATA REVIEW (CONTINUED)

## G. ENFORCEMENT (continued)

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

Yes

No

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?

Yes

No

b. If yes, how many were due to nondomestic waste issues (O&G blockages)?

**In 2017, the city has three SSOs, none were due to nondomestic discharges.**

## H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

**Designated locking drawer.**

2. How are requests by the public to review files handled?

**public can request IU discharge or permit information from the City Clerk's office. The pretreatment office supplies the requested documents to the Clerk's office for review by the requester.**

## SECTION I: DATA REVIEW (CONTINUED)

### H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

The CA has an approved budget to move to electronic reporting of IU data. The IU permitting database is called LINKO. DMs, violations, compliance are being tracked on paper. LINKO is currently approved. The plan is to move to hosted LINKO and also connect it to the City's GIS.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

Yes. City hopes it will be even more effective when it's made fully electronic.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

- proposed revisions are public noticed
- public invited to attend City Council meetings
- public hearings are conducted.

6. Explain any public or community issues affecting the CA's pretreatment program.

No apparent issues.

7. How long are records maintained? [403.12(o)]

3 5 Years.

Five years in the past. Now reduced to three years.

# SECTION I: DATA REVIEW (CONTINUED)

## I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program.

3 inspectors who perform all the tasks below except legal assistance, sample analysis and admin.  $0.5 + 0.5 (=1)$  for legal assistance/admin and sample analysis. 1 program manager  $5.0$

Activity	FTEs	Activity	FTEs
Legal Assistance	0.5*	Sample Analysis	0.5
Permitting	3**	Data Analysis: Review and Response	3**
Inspections	3**	Enforcement	3**
Sample Collection	3**	Administration	*** 1 + 0.5*

Total Number of FTEs

5

\* once person (count once), \*\* total 3 inspectors, \*\*\* manager

Yes

No

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

X

If not, explain.

3. a. Estimate the annual operating budget for the CA's program.

\$ 700,000

approximate

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?

expected to stay the same.

Discuss any changes in funding.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

None.

## SECTION I: DATA REVIEW (CONTINUED)

### I. RESOURCES (continued) [403.8(f)(3)] (continued)

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

- staff attend pretreatment workshops and water quality conferences - national & local
- participate in, moderate, administer Yahoo! Pretreatment Groups
- subscription to the federal register online

b. Does the CA have adequate reference material to implement its program?

Yes	No
X	

### J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the POTW monitored in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- Toxicity Characteristic Leachate Procedure (TCLP)
- Extraction Procedure (EP) toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)
4	4	4	0
1	1	1	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
			0
			Less   Equal   More
			✓

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences.

These data was obtained from the NPDES permit and monitoring data submitted by the City.

# SECTION I: DATA REVIEW (CONTINUED)

## J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

- c. Is the CA reporting these results to the Approval Authority?  
If yes, at what frequency?

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

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality?
- Sludge disposal options?

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

- b. Has the CA documented these findings?

Explain. (Attach a copy of the documentation, if appropriate.)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

*Trends will be evaluated in the upcoming Annual Report.*  
Discuss on a pollutant-by-pollutant basis.

# SECTION I: DATA REVIEW (CONTINUED)

## J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes

No

If yes, what was found?

City Staff have noticed NO unusual trends in influent loading, so the pretreatment program did not conduct any loading investigations.

5. a. Has the CA implemented any kind of public education program?

Yes

No

b. Are there any plans to initiate such a program to educate users about pollution prevention?

Explain.

Utilities department has three employees dedicated for outreach and public education.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

- Hazardous waste program for households administered by Snohomish County.
- Small quantity generator program

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes

No

Explain.

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION I COMPLETED

BY: *Biniam Zetebw*

TITLE: *Environmental Engineer*

DATE: *12/19/2017*

TELEPHONE: *425 649 7127*

## SECTION II: IU FILE EVALUATION

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

### IU IDENTIFICATION

FILE <u>773-13</u> Industry name and address <u>Jamco America, Inc.</u> <u>1018 80th St SW</u> <u>Everett, WA 98203</u>	Type of industry <u>Aircraft parts manufacturing</u>  SIC Code: <u>3728</u> NAICS Code: <u>336413</u>
--	--

<input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , <u>17</u> , <u>ASTUS</u>  Category(ies) <u>Metal Finishing</u>	Average total flow (gpd) <u>500 gpd / twice / week</u> <u>250 gpd avg daily</u>	Average process flow <u>Same</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Comments permit is nearly due for renewal and renewal application is due; permit effective dates: 2/1/2013 - 2/15/2018  
- facility is in compliance  
- files were well organized and up-to-date. Reviewed DMRs, inspection reports, permit, fact sheet, enforcement (no ent in 2017)  
city sampling results.

FILE <u>7703-16</u> Industry name and address <u>StockPot, Inc.</u> <u>1505 Industry Street</u> <u>Everett, WA 98203</u>	Type of industry <u>food production</u>  SIC Code: <u>2099</u> NAICS Code: <u>311999</u>
---	---

<input type="checkbox"/> CIU 40 CFR <u>403</u> , _____, _____  Category(ies) <u>non-categorical</u>	Average total flow (gpd) <u>200,000</u>	Average process flow <u>200,000</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Comments permit effective date July 1, 2016 - June 30, 2021  
All requested files were readily available. Facility is in compliance.  
- Files reviewed: DMRs, inspection reports, permit, fact sheet and enforcement (no ent.), city sampling results.

# SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u>7737</u> Industry name and address <u>Umbra Cuscinetti, Inc.</u> <u>6707 Harrison Road</u> <u>Everett, WA 98204</u>	Type of industry <u>Aircraft part Manufacturing</u>  SIC Code: <u>3728</u> NAICS Code: <u>336413</u>	
<input type="checkbox"/> CIU 40 CFR <u>433.17</u> <u>P505</u>  Category(ies) <u>Metal Finishing</u>	Average total flow (gpd) <u>app 400 gpd</u> <u>approximately.</u>	Average process flow <u>400 gpd</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments <u>Permit effective dates 8/1/2013 - 7/31/2018</u> <u>Facility is in compliance. All files requested were readily</u> <u>available. Files reviewed include: DMRs, Inspection</u> <u>reports, permit, hot sheet, City sampling.</u>		
FILE _____ Industry name and address	Type of industry  SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____  Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

## SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE _____ Industry name and address   	Type of industry   SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____  Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
General Comments		

## SECTION II: IU EVALUATION (CONTINUED)

Industry Name					<b>INSTRUCTIONS:</b> Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.		
Jamco America Inc. Stock Pot, Inc. Umbra Cusimetti							
File	File	File	File	File	<b>IU FILE REVIEW</b>		<b>Reg. Cite</b>
7731	7703	7737			<b>A. ISSUANCE OF IU CONTROL MECHANISM</b>		
OK	OK	OK			1. Control mechanism application form		403.8(f)(1)(iii)  403.8(f)(1)(iii)(A) 403.8(f)(1)(iii)(B) 403.8(f)(1)(iii)(B)(1) 403.8(f)(1)(iii)(B)(2) 403.8(f)(1)(iii)(B)(3)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			2. Fact sheet		
					3. Issuance or reissuance of control mechanism		
OK <sup>3</sup>	OK <sup>3</sup>	OK <sup>3</sup>			a. Individual control mechanism		
N/A	N/A	N/A			b. General control mechanism		
					4. Control mechanism contents		
OK <sup>2</sup>	OK <sup>2</sup>	OK <sup>2</sup>			a. Statement of duration (≤ 5 years)		
OK <sup>1</sup>	OK <sup>1</sup>	OK <sup>1</sup>			b. Statement of nontransferability w/o prior notification/approval		
OK <sup>5</sup>	OK <sup>5</sup>	OK <sup>5</sup>			c. Applicable effluent limits (local limits, categorical standards, BMPs)		
<b>Comments</b>					(1) Section 7.p of each permit - Limitation of permit transferability. (2) each permit is effective for 5 years (boilerplate language) (3) permits issued and managed adequately. (4) fact sheets accompany each permit. (5) categorical standards applied in combination with local limits, whichever is more stringent. For 7703 - local limits only apply. They have detectable metals & occasional Mercury hit when they process fish. (6) The city's pretreatment program doesn't utilize general permits		

## SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>7731</u>	<u>7703</u>	<u>7737</u>			<b>A. ISSUANCE OF IU CONTROL MECHANISM (continued)</b>	
OK	OK	OK			d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
OK <sup>1</sup>	OK <sup>1</sup>	OK <sup>1</sup>			<ul style="list-style-type: none"> <li>• Identification of pollutants to be monitored</li> </ul>	
OK	N/A	OK			<ul style="list-style-type: none"> <li>• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)</li> </ul>	
OK	OK	OK			<ul style="list-style-type: none"> <li>• Is the monitoring waiver certification language included in the control mechanism? (Y/N)</li> </ul>	403.12(e)(2)(v)
					<ul style="list-style-type: none"> <li>• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)</li> </ul>	403.12(e)(2)(vi)
OK	OK	OK			<ul style="list-style-type: none"> <li>• Sampling frequency</li> </ul>	
OK <sup>2</sup>	OK <sup>2</sup>	OK <sup>2</sup>			<ul style="list-style-type: none"> <li>- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)</li> </ul>	
NO	NO	NO			<ul style="list-style-type: none"> <li>• Sampling locations/discharge points</li> </ul>	
OK <sup>3</sup>	OK	OK <sup>4</sup>			<ul style="list-style-type: none"> <li>• Sample types (grab or composite)</li> </ul>	
OK <sup>5</sup>	OK <sup>5</sup>	OK <sup>5</sup>			<ul style="list-style-type: none"> <li>• Reporting requirements (including all monitoring results)</li> </ul>	
OK <sup>6</sup>	OK <sup>6</sup>	OK <sup>6</sup>			<ul style="list-style-type: none"> <li>• Record-keeping requirements</li> </ul>	
OK <sup>7</sup>	OK <sup>7</sup>	OK <sup>7</sup>				
Comments (3) discharge batch tank (4) floor sump where all process water is drained to after pH neutralization (5) all grab (1) tabulated in the permits (2) sampling frequency is clearly indicated for each pollutant in the permit. (6) monthly DMRs or otherwise specified if not monthly. (7) Record keeping requirements - are 3 years of retention. This is boilerplate language.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7331	7303	7337				
A. ISSUANCE OF IU CONTROL MECHANISM (continued)						
OK <sup>1</sup>	OK <sup>1</sup>	OK <sup>1</sup>			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
OK <sup>2</sup>	OK <sup>2</sup>	OK <sup>2</sup>			f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
OK <sup>3</sup>	OK <sup>3</sup>	OK <sup>3</sup>			g. Notice of slug loadings	403.12(f)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			i. Notification of significant change in discharge	403.12(j)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			k. 24-hour notification of violation/resample requirement	403.12(g)(2)
OK	OK	OK			l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments						
(1) Enforcement provision included in all permits under the 'general conditions' section.						
(2) No compliance schedules in those permits but its used when applicable. Community Transit and Shin Nippon are currently under compliance schedule.						
(3) slug discharge reports are required of each permittee. This is under the "Reporting Requirements" of each permit.						
(4) Boilerplate language - applied in each permit.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737			<b>A. ISSUANCE OF IU CONTROL MECHANISM (continued)</b>	
NA	NA	NA			5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
					e. Documentation to support the POTW's determination	
✓	✓	✓				
Comments: The three permits are individual permits. The program doesn't utilize general permits or control mechanisms.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737	---	---		
B. CA APPLICATION OF IU PRETREATMENT STANDARDS						
OK <sup>1</sup>	OK <sup>2</sup>	OK <sup>3</sup>			1. IU categorization	403.8(f)(1)(ii)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			2. Calculation and application of categorical standards	403.8(f)(1)(ii)
OK	OK	OK			a. Classification by category/subcategory	
OK	OK	OK			b. Classification as new/existing source	
OK <sup>5</sup>	OK <sup>5</sup>	OK <sup>5</sup>			c. Application of limits for all regulated pollutants	
NA	NA	NA			d. Classification as an NSCIU	403.3(v)(2)
NA	NA	NA			e. Documentation for the qualification to be classified as NSCIU	
NA	NA	NA			f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
OK <sup>5</sup>	OK <sup>5</sup>	OK <sup>5</sup>			3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA <sup>7</sup>	NA <sup>7</sup>	NA <sup>7</sup>			4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	NA	NA			5. Calculation and application of production-based standards	403.6(c)
Comments						
(1) 40 CFR part 433.17 PSNS						
(2) Non-categorical						
(3) 40 CFR part 433.17 PSNS						
(4) IUs are properly categorized and classified and limits are applied for all regulated pollutants.						
(5) Local limits are applied when industry is not categorical or if the local limits are more stringent for any given pollutant regulated in the permit. Local limits are more stringent than 433 for the following: CN, As, Cd, Cu, Pb, Hg, & pH.						
(6) NO BOD, TSS, total FOG limits — report only (sample 2x/week)						
No polar FOG 200 mg/L → 2/week						
pH → 5-11 continuous						
metals = local limits. Facility is food processor but shows detectable metals, Hg in particular.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737				
					<b>B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)</b>	
NA	NA	NA			6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
X	X	X			8. Calculation and application of CWF or FWA	403.6(d)&(e)
OK	OK	OK			9. Application of most stringent limit	403.8(f)(1)(ii)
Comments: Equivalent mass and equivalent concentration limits not used. No numeric categorical limits for these categorical industries (7731 & 7737). 7703 - used local limits - conc. based.						

## SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737				
<b>C. CA COMPLIANCE MONITORING</b>						
OK <sup>1</sup>	OK <sup>2</sup>	OK <sup>3</sup>			1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA	NA	NA			a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
NA	NA	NA			b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
NA	NA	NA			• Inspect at least once every 2 years	
OK	OK	OK			2. Inspection at frequency specified in approved program	403.8(c)
OK <sup>4</sup>	OK <sup>4</sup>	OK <sup>4</sup>			3. Documentation of inspection activities	403.8(f)(2)(v)
					4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
OK <sup>5</sup>	OK <sup>5</sup>	OK <sup>5</sup>			5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
OK <sup>6</sup>	OK <sup>6</sup>	OK <sup>6</sup>			a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
					• Sample waived pollutant(s) at least once during the term of the control mechanism	
NA	NA	NA			b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
NA	NA	NA			6. Sampling at the frequency specified in approved program	403.8(c)
OK <sup>6</sup>	OK <sup>6</sup>	OK <sup>6</sup>			7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
OK <sup>7</sup>	OK <sup>7</sup>	OK <sup>7</sup>			8. Analysis for all regulated parameters	403.12(g)(1)
OK	OK	OK			9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
OK <sup>8</sup>	OK <sup>8</sup>	OK <sup>8</sup>				
Comments (1,2,3) each facility inspected twice per year. 7737 (Umbra) was jointly inspected by CA & Ecology as part of this PCA on 12/20/2017. (4) Reviewed city inspection reports. City may need a checklist or form to standardize inspection activities. (5) Slug control & discharge reporting required in permit (6) Sampling is specified twice per year & done accordingly. (7) Lab data shows complete C.O.C. & analyses QA/QC. (8) All analyses are per part 136.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737				
D. CA ENFORCEMENT ACTIVITIES						
OK <sup>1</sup>	OK <sup>1</sup>	OK <sup>1</sup>			1. Identification of violations	403.8(f)(2)(vii)
↓	↓	↓			a. Discharge violations	
					• IU self-monitoring	
↓	↓	↓			• CA compliance monitoring	
OK <sup>2</sup>	OK <sup>2</sup>	OK <sup>2</sup>			b. Monitoring/reporting violations	
↓	↓	↓			• IU self-monitoring	
					– Reporting (e.g., frequency, content)	
					– Sampling (e.g., frequency, pollutants)	
					– Record-keeping	
↓	↓	↓			• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
OK <sup>3</sup>	OK <sup>3</sup>	OK <sup>3</sup>			• Slug discharge control plan	
↓	↓	↓			• Compliance schedule/reports	
					c. Compliance schedule violations	
					• Start-up/final compliance	
↓	↓	↓			• Interim dates	
Comments (1, 2, 3) There were no violations by any of these IUs in 2017 hence no enforcement activities. – The updated ERP was approved in January 2016. The city has been adhering to its ERP in cases where violations are identified.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737				
D. CA ENFORCEMENT ACTIVITIES (continued)						
OK	OK	OK			2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
OK	OK	OK			3. Response to violation	
OK	OK	OK			4. Adherence to approved ERP	403.8(f)(5)
OK	OK	OK			5. Return to compliance	
OK	OK	OK			a. Within 90 days	
OK	OK	OK			b. Within time specified	
OK	OK	OK			c. Through compliance schedule	
OK	OK	OK			6. Escalation of enforcement	403.8(f)(5)(ii)
OK	OK	OK			7. Publication for SNC	403.8(f)(2)(viii)
Comments (1) There were no SNCs in 2017 by any of the permittees including these three. - with respect to Response to violations, adherence to its ERP, bringing facilities into compliance by escalating enforcement actions, the City has demonstrated that it's capable of fully enforcing on significant violations. Shin Nippon & community Transit were brought into compliance by such prudent activities.						

## SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737			<b>E. IU COMPLIANCE STATUS</b>	
OK <sup>1</sup>	OK <sup>1</sup>	OK <sup>1</sup>			1. Self-monitoring and reporting	
↓	↓	↓			a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
↓	↓	↓			b. Analysis of all required pollutants	403.12(g)(1)&(h)
↓	↓	↓			c. Appropriate analytical methods (40 CFR Part 136)	
↓	↓	↓			d. Appropriate sample collection methods	
↓	↓	↓			e. Compliance with sample collection holding times	
↓	↓	↓			f. Submission of BMR/90-day report	403.12(b) &(d)
↓	↓	↓			g. Periodic self monitoring reports	403.12(e)&(h)
↓	↓	↓			h. Reporting all required pollutants	403.12(g)(1)&(h)
↓	↓	↓			i. Signatory/certification of reports	403.12(l)
NA	NA	NA			j. Annual certification by NSCIUs	403.12(q)
NA	NA	NA			k. Submission of compliance schedule reports by required dates	403.12(c)
OK <sup>2</sup>	OK <sup>2</sup>	OK <sup>2</sup>			l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
↓	↓	↓			• Discharge violation	
↓	↓	↓			• Slug load	
↓	↓	↓			• Accidental spill	
OK	OK	OK			m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
OK	OK	OK			n. Notification of hazardous waste discharge	403.12(j)&(p)
OK	OK	OK			o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
OK	OK	OK			p. Notification of significant changes	403.12(j)
<p>Comments (1) permit clearly states all these requirements. The IUs reviewed showed no issues with the self monitoring program</p> <p>(2) No such notification from these IUs in 2017</p> <p>⇒ IUs are in full compliance at this time.</p>						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737			<b>E. IU COMPLIANCE STATUS (continued)</b>	
NA <sup>1</sup>	NA <sup>1</sup>	NA <sup>1</sup>			2. Compliance with all general control mechanism requirements	
NA	NA	NA			3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
↓	↓	↓			<ul style="list-style-type: none"> <li>Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)</li> <li>Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW</li> <li>Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant</li> </ul>	
↓	↓	↓			4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
NA <sup>2</sup>	NA <sup>2</sup>	NA <sup>2</sup>			<ul style="list-style-type: none"> <li>Certification statements with each compliance report</li> </ul>	
NA	NA	NA			5. Compliance with BMR requirements, if applicable (Y/N)	
NA <sup>3</sup>	NA <sup>3</sup>	NA <sup>3</sup>			6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
↓	↓	↓			<ul style="list-style-type: none"> <li>IU discharges less than 100 gpd of total categorical wastewater</li> <li>Annual certification statements from the IU</li> </ul>	
Comments (1) No general control mechanisms in program. (2) No monitoring waivers are issued by City (3) All three IUs are NOT NSCIU. The city however has two NSCIUs and it follows both requirements to keep the facilities under that categorization: discharges < 100 gpd & the annual certification is collected and reviewed.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
7731	7703	7737				
					<b>E. IU COMPLIANCE STATUS (continued)</b>	
NA	NA	NA			7. If the CA has established equivalent mass limits for a CIU <ul style="list-style-type: none"> <li>• IU is effectively operating treatment technologies to achieve compliance</li> <li>• IU is recording the facility's flow rates</li> <li>• IU is recording the facility's production rates</li> <li>• IU has notified the CA whenever production rates vary</li> <li>• IU continues to employ water conservation methods/technologies</li> </ul>	403.6(c)(5)(ii)
↓	↓	↓				
↓	↓	↓				
↓	↓	↓				
↓	↓	↓				
↓	↓	↓				
Comments: The City of Everett has not established equivalent mass limits for any IUs.						

# SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						
SECTION II COMPLETED BY: <i>Biniam Teklow</i>						DATE: <i>12/19/2017</i>
TITLE: <i>Environmental Engineer</i>						TELEPHONE: <i>425 649 7127</i>

### SECTION III: OBSERVATIONS AND CONCERNS

**INSTRUCTIONS:** On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>		
<ul style="list-style-type: none"> <li>Status of program modifications <i>There are no program modifications in progress at the present.</i></li> </ul>	403.18	I.A.1
<ul style="list-style-type: none"> <li>Modification to the program to accommodate the 2005 General Pretreatment Regulation changes <i>pretreatment streamlining amendments have already been addressed, the City being the first one to submit its modification in the State.</i></li> </ul>	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
<b>B. LEGAL AUTHORITY</b>		
<ul style="list-style-type: none"> <li>Minimum legal authority requirements <i>No further requirements.</i></li> </ul>	403.8(f)(1)	I.B.2&3
<ul style="list-style-type: none"> <li>Adequate multijurisdictional agreements <i>No further requirements.</i></li> </ul>	403.8(f)(1)	I.B.1&3

### SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
<b>C. IU CHARACTERIZATION</b>		
<ul style="list-style-type: none"> <li>Application of <i>significant industrial user</i> definition <i>No further requirements.</i></li> </ul>	403.3(v)(1)	I.C.1; Attach B.E.2
<ul style="list-style-type: none"> <li>Application of <i>middle-tier CIU</i> definition <i>No further requirements.</i></li> </ul>		
<ul style="list-style-type: none"> <li>Application of <i>NSCIU</i> definition <i>No further requirements.</i></li> </ul>		
<ul style="list-style-type: none"> <li>Identify and categorize IUs <i>No further requirements.</i></li> </ul>	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
<b>D. CONTROL MECHANISM</b>		
<ul style="list-style-type: none"> <li>Issuance of individual or general control mechanisms to all SIUs <i>No further requirements.</i></li> </ul>	403.8(f)(1)(iii)	I.D.1
<ul style="list-style-type: none"> <li>Adequate control mechanisms <i>No further requirements.</i></li> </ul>	403.8(f)(1)(iii)(B)	II.A.4
<ul style="list-style-type: none"> <li>Adequate control of trucked, railed, and dedicated pipe wastes <i>No further requirements.</i></li> </ul>	403.5(b)(8)	I.D.2&3, E.1

### SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
<b>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>		
<ul style="list-style-type: none"> <li>Appropriately categorize, notify, and apply all applicable pretreatment standards</li> </ul> <p><i>No further requirements.</i></p>	403.8(f)(1)(ii)&(iii) 403.5	II.B
<ul style="list-style-type: none"> <li>Basis and adequacy of local limits</li> </ul> <p><i>The previous audit (2014) stated that the program should present its basis for the determination of the effectiveness of its local limits in annual reports. photo of sludge metal assays overtime would be an example of such an evidence - Ecology still recommends for this activity in upcoming annual reports from the City</i></p>	403.8(f)(4); 122.21	I.E.3&4
<b>F. COMPLIANCE MONITORING</b>		
<ul style="list-style-type: none"> <li>Adequate sampling and inspection frequency</li> </ul> <p><i>No further requirements</i></p>	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> <li>Adequate inspections</li> </ul> <p><i>- Ecology recommends for the City to develop a form or a checklist as in the one in EPA's IV site visit data sheet in its 2010 Guidance for pretreatment audit, Attachment D. The form is attached</i></p>	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> <li>Adequate sampling protocols and analysis</li> </ul> <p><i>No further requirements.</i></p>	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9 <i>for the Inspection at Umbra CUScinetti.</i>

### SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
<b>F. COMPLIANCE MONITORING (continued)</b>		
<ul style="list-style-type: none"> <li>Adequate IU self-monitoring <i>No further requirements</i></li> </ul>	403.8(f)(2)(iv)	I.F.6, G.5; II.E
<ul style="list-style-type: none"> <li>Notification of changed and hazardous waste discharges <i>No further requirements.</i></li> </ul>	403.12(j)&(p)	I.F.8; II.D.1.b
<ul style="list-style-type: none"> <li>Evaluate the need for SIUs to develop slug discharge control plans <i>No further requirements.</i></li> </ul>	403.8(f)(2)(vi)	I.F.9; II.C.4
<ul style="list-style-type: none"> <li>Monitor to demonstrate continued compliance and resampling after violation(s) <i>No further requirements</i></li> </ul>	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
<b>G. ENFORCEMENT</b>		
<ul style="list-style-type: none"> <li>Appropriate application of <i>significant noncompliance</i> definition <i>No further requirements.</i></li> </ul>	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
<ul style="list-style-type: none"> <li>Develop and implement an ERP <i>No further requirements.</i></li> </ul>	403.8(f)(5)	I.G.2; II.D.3
<ul style="list-style-type: none"> <li>Annually publish a list of IUs in SNC <i>No further requirements.</i></li> </ul>	403.8(f)(2)(viii)	I.G.4; II.D.7

### SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
<b>G. ENFORCEMENT (continued)</b>		
<ul style="list-style-type: none"> <li>Effective enforcement <i>no further requirements.</i></li> </ul>	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
<b>H. DATA MANAGEMENT/PUBLIC PARTICIPATION</b>		
<ul style="list-style-type: none"> <li>Effective data management/public participation <i>no further requirements.</i></li> </ul>	403.5(c)(3); 403.12(o); 403.14	I.H
<b>I. RESOURCES</b>		
<ul style="list-style-type: none"> <li>Adequate resources <i>no further requirements.</i></li> </ul>	403.8(f)(3)	I.I

### SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
<b>J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION</b>		
<ul style="list-style-type: none"> <li>Understanding of pollutants from all sources <i>No further requirements.</i></li> </ul>		I.J.1&3
<ul style="list-style-type: none"> <li>Documentation of environmental improvements/effectiveness <i>No further requirements</i></li> </ul>		I.J.2
<ul style="list-style-type: none"> <li>Integration of pollution prevention <i>No further requirements.</i></li> </ul>		I.J.6
<b>K. ADDITIONAL EVALUATIONS/INFORMATION</b>		
<p><i>The city will need to develop a plan for implementing the newly promulgated dental point source category: 40 CFR part 441. The City may use the one-time-report form EPA developed. Ecology has a similar form with some modifications. Existing dental offices need to implement the new dental rules by July 2020. New dental offices are required to comply as of July 2020.</i></p>		
SECTION II COMPLETED BY: <i>Brian Zetlow</i>		DATE: <i>1/5/2018</i>
TITLE: <i>Environmental Engineer</i>		TELEPHONE: <i>425 649 7127</i>

**ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE**

## PRETREATMENT PROGRAM STATUS UPDATE

**INSTRUCTIONS:** This attachment is intended to serve as an update of program status. Either the auditor or CA should updated this form before each audit on the basis of information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

### A. CA INFORMATION

1. CA name <u>City of Everett</u>									
2. a. Pretreatment contact <u>Jeff Kerwin</u> <u>(425) 257-8241</u>		b. Mailing address <u>3200 Cedar Street</u> <u>Everett, WA 98201</u>							
c. Title <u>Program manager</u>		d. Telephone number <u>(425) 257-8241</u>							
3. Date of last CA report to Approval Authority <u>3/27/2017</u>									
4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td></td> <td style="text-align: center;"><u>X</u></td> </tr> </table>	Yes	No		<u>X</u>		
Yes	No								
	<u>X</u>								
5. Effluent and sludge quality									
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)									
<b>Parameters Violated</b>		<b>Cause(s)</b>							
<u>No violations in 2017</u>		<u>N/A</u>							
b. Has the treatment plant sludge violated these tests?			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td></td> <td style="text-align: center;"><u>X</u></td> </tr> <tr> <td></td> <td style="text-align: center;"><u>X</u></td> </tr> </table>	Yes	No		<u>X</u>		<u>X</u>
Yes	No								
	<u>X</u>								
	<u>X</u>								
• EP toxicity • TCLP									
6. Does the treatment plant discharge to a 303(d) impaired waterbody?			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"><u>✓</u></td> <td></td> </tr> </table>	Yes	No	<u>✓</u>			
Yes	No								
<u>✓</u>									
If yes, list the pollutants of concern. <u>Snohomish River</u> <u>Temperature - Category 1</u>									
7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed?			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td></td> <td style="text-align: center;"><u>✓</u></td> </tr> </table>	Yes	No		<u>✓</u>		
Yes	No								
	<u>✓</u>								
If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).									

## PRETREATMENT PROGRAM STATUS UPDATE

<b>B. PRETREATMENT PROGRAM STATUS</b>				
1. Indicate components that were identified as deficient.				
a. Program modification b. Legal authority c. Local limits d. IU characterization e. Control mechanism f. Application of Pretreatment Standards g. Compliance monitoring h. Enforcement program i. Data management j. Program resources k. Other (specify)	<b>Last PCI</b> <b>Date:</b>	<b>Last Audit</b> <b>Date:</b>	<b>Program Report</b> <b>Date:</b>	
	Dec. 2015	Dec. 2014	Mar. 2017	
2. Is the CA presently in RNC for any of these violations?				
	<b>Data Source</b>	<b>Yes</b>	<b>No</b>	
a. Failure to enforce against pass through and/or interference [ RNC - I ] [ SNC ]			X	
b. Failure to submit required reports within 30 days [ RNC - I ] [ SNC ]			X	
c. Failure to meet compliance schedule milestones within 90 days [ RNC - I ] [ SNC ]			X	
d. Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months [ RNC - II ]			X	
e. Failure to inspect or sample 80% of SIUs within the past 12 months [ RNC - II ]			X	
f. Failure to enforce standards and reporting requirements [ RNC - II ]			X	
g. Other (specify) [ RNC - II ]			X	
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)				
<b>Name of SIU in SNC</b>	<b>Compliance Status</b>	<b>Source</b>		
None in 2017 Audit				
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.				
				SNC Evaluation Period <span style="border: 1px solid black; padding: 2px;">2017</span>
0	%	Applicable Pretreatment Standards and reporting requirements	<b>*SNC defined by:</b>	
0	%	Self-monitoring requirements	<b>POTW</b>	✓
0	%	Pretreatment compliance schedules	<b>EPA</b>	✓

## PRETREATMENT PROGRAM STATUS UPDATE

### B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program. The City of Everett continues to do an excellent job with implementing their pretreatment program. In 2014, the ERP had deficiencies in its approach of implementing escalating levels of enforcement. This was duly addressed. The updated ERP was approved by Ecology on January 11, 2016.

ATTACHMENT A COMPLETED BY: Biniam Zetelow

TITLE: Environmental Engineer

DATE: 1/5/2018

TELEPHONE: (425) 649-7127

**ATTACHMENT B: PRETREATMENT PROGRAM PROFILE**

## PRETREATMENT PROGRAM PROFILE

**INSTRUCTIONS:** This attachment is intended to serve as a summary of program information. The auditor or CA should obtain the needed information from the original, approved pretreatment program submission and modifications and the NPDES permit. The auditor or CA should update this from, as appropriate, in response to approved modifications and revised NPDES permit requirements.

### A. CA INFORMATION

1. CA name City of Everett

2. Original pretreatment program submission date November 25, 1986

3. Required frequency of reporting to Approval Authority Annual (by April 1<sup>st</sup>)

4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
City of Everett Water Pollution Control Facility	WA0024490	Nov. 1, 2015	Oct. 30, 2020

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?

Yes

No

☒

If yes, provide the following information.

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
City of Everett	WA Dept. of Ecology	Nov. 1, 2015	Oct. 30, 2020	pH, Oil+Grease, Cyanide, Total Phenolics, ppm, Hg, Vol. Organics, Acid-extractable compounds, base-neutral compounds, pesticides/PCBs.

### B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation?

2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Name of Modification	Date Incorporated in NPDES Permit
	1996 Ordinance Modification	
	2008 Ordinance Modification	

## PRETREATMENT PROGRAM PROFILE (Continued)

<b>C. TREATMENT PLANT INFORMATION</b>									
<b>INSTRUCTIONS:</b> Complete this section for each treatment plant operated under an NPDES permit issued to the CA.									
1. Treatment plant name City of Everett Water Pollution Control Facility		2. Location address 4027 4 <sup>th</sup> Street Southeast Everett, WA 98205							
3. a. NPDES permit number WA0024490	b. Expiration date Oct. 30, 2020	4. Treatment plant wastewater flows Design <span style="border: 1px solid black; padding: 0 5px;">40.3</span> mgd      Actual <span style="border: 1px solid black; padding: 0 5px;">23.7</span> mgd							
5. Sewer System		a. Separate      %      b. Combined      %      c. Number of CSOs							
6. a. Industrial contribution (mgd)  <span style="border: 1px solid black; padding: 0 20px;">0.8</span>		b. Number of SIUs discharging to plant  <span style="border: 1px solid black; padding: 0 20px;">22</span>							
		c. Percent industrial flow to plant  <span style="border: 1px solid black; padding: 0 20px;">3.4%</span>							
7. Level of treatment		<b>Type of Process(es)</b>							
a. Primary		Primary Clarifiers							
b. Secondary		Biological treatment (lagoons), trickling filters/solids contact							
c. Tertiary									
8. Indicate methods of sludge disposal.									
<table style="width: 100%; border: none;"> <tr> <td colspan="2" style="text-align: center;">Quantity of sludge</td> <td colspan="2" style="text-align: center;">Quantity of sludge</td> </tr> <tr> <td style="width: 50%; vertical-align: top;"> a. Land application    <span style="border: 1px solid black; padding: 0 20px;">2000</span> dry tons/year  b. Incineration        <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year  c. Monofill            <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year  d. MSW landfill        <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year </td> <td style="width: 50%; vertical-align: top;"> e. Public distribution    <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year  f. Lagoon storage        <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year  g. Other (specify)        <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year </td> </tr> </table>				Quantity of sludge		Quantity of sludge		a. Land application <span style="border: 1px solid black; padding: 0 20px;">2000</span> dry tons/year b. Incineration <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year c. Monofill <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year d. MSW landfill <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year	e. Public distribution <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year f. Lagoon storage <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year g. Other (specify) <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year
Quantity of sludge		Quantity of sludge							
a. Land application <span style="border: 1px solid black; padding: 0 20px;">2000</span> dry tons/year b. Incineration <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year c. Monofill <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year d. MSW landfill <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year	e. Public distribution <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year f. Lagoon storage <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year g. Other (specify) <span style="border: 1px solid black; padding: 0 20px;"></span> dry tons/year								
<b>D. APPLICATION OF STANDARDS</b>									
If there is more than one treatment plant, were local limits established specifically for each plant?		<b>N/A</b> <div style="text-align: center;"><span style="font-size: 1.5em;">X</span></div>	<b>Yes</b>	<b>No</b>					

## PRETREATMENT PROGRAM PROFILE (Continued)

### E. ADDITIONAL INFORMATION

• Multiple Emergency Response Plan updates

ATTACHMENT B COMPLETED  
BY:

TITLE:

DATE:

TELEPHONE:

## **ATTACHMENT C: LEGAL REVIEW CHECKLIST**

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
8. Hauled Waste Reporting/Requirements		§ 3.4	X			2.1.B(3)	Hauled waste spec
9. Grease Interceptor Reporting/Requirements		§ 3.2 C	X			2.9.B <sup>429</sup>	Separate ordinance 3071-08
10. Authority to Issue Notice of Violations (NOVs)		§ 10.1	X			9.1	
11. Authority to Issue Administrative Orders (AOs)			X			9.4+9.5	
12. Authority to Issue Administrative Penalties		§ 10.6	X			9.6	
13. Authority to Enforce Against Falsification or Tampering			X			10.3.C	
14. Any Other Supplemental Enforcement Actions as Noted in the POTW's Enforcement Response Plan							
15. Permit Appeals Procedures			X			3.11	
16. Penalty or Enforcement Appeals Procedures			X			9.9	
17. Bypass Notification	403.17	§ 13.3	X			12.3	

Document(s) submitted for review:

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Name of Reviewers

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NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
<b>2. Emergency Response</b>							
a. Immediately Halt Actual/Threatened Discharged	403.8(f)(1)(vi)(B)	§ 10.7	X			9.7	
<b>3. Legal Authority to Enforce Enforcement Response Plan</b>	403.8(f)(1)(vi)	§ 11.4	X			16.4	
<b>H. Public Participation</b>							
1. Publish List of Industrial Users in Significant Noncompliance <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(viii)	§ 9	X			8	
<b>2. Access to Data [403.8(f)(1)(vii) &amp; 403.14]</b>							
a. Government	403.14(a) & (c)	§ 8	X			7	
b. Public	403.14(b)	§ 8	X			7	
<b>I. Optional Provisions</b>							
1. Net/Gross Adjustments <i>[streamlining provision]</i>	403.15	§ 2.2 D	X			2.7	
2. Equivalent Mass Limits for Concentration Limits <i>[streamlining provision]</i>	403.6(e)	§ 2.2 E	X			2.4	
3. Equivalent Concentration Limits for Mass Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 F	X			—	
4. Upset Notification	403.16	§ 13.1	X			12.1	
5. Waive Monitoring for Pollutant Not Present or Expected to be Present <i>[streamlining provision]</i>	403.12(e)(2)	§ 6.4B	X			—	
6. Reduce Periodic Compliance Reporting <i>[streamlining provision]</i>	403.12(e)(3)	§ 6.4C	X			—	
7. Other Special Agreement or Waivers (Excluding Wavier of National Categorical Pretreatment Standards and Requirements)			X			2.7	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
o. Certification of Pollutant Not Present <i>[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]</i>	403.12(e)(2)(v)	§ 6.14C	X			-	Does not apply
<b>E. Test Procedures [40 CFR Part 136 &amp; 403.12(g)]</b>							
1. Analytical Procedures (40 CFR Part 136) <i>[NOTE: Required streamlining provisions]</i>	403.12(g)	§ 6.10	X			5.2	
2. Sample Collection Procedures <i>[NOTE: Required streamlining provisions]</i>	403.12(g)(3) & (4)	§ 6.11	X			5.1	
<b>F. Inspection and Monitoring Procedures [403.8(f)]</b>							
1. Right to Enter All Parts of the Facility at Reasonable Times	403.8(f)(1)(v)	§ 7.1	X			6.1	
2. Right to Inspect Generally for Compliance	403.8(f)(1)(v)	§ 7.1	X			6.1	
3. Right to Take Independent Samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1	X			6.1	
4. Right to Require Installation of Monitoring Equipment	403.8(f)(1)(iv)	§ 7.1	X			6.2	
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1	X			6.1	
<b>G. Remedies for Noncompliance (Enforcement) [403.8(f)(1)(vi)]</b>							
1. Non-Emergency Response							
a. Injunctive Relief	403.8(f)(1)(vi)	§ 11.1	X			10.1	
b. Civil/criminal Penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3	X			10.2 & 10.3	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
f. Notification of Changes Affecting Potential for a Slug Discharge <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(vi)	§ § 6.5 & 6.6	X			4.9 & 2.12	
g. Notice of Violation/Sampling Requirement <i>[NOTE: Required streamlining revision.]</i>	403.12(g)(2)	§ 6.8	X			4.8	
h. Requirement to Conduct Representative Sampling	403.12(g)(3)	§ 6.4E	X			5.1	
i. Notification of Changed Discharge	403.12(j)	§ 6.5	X			4.9	
j. Notification of Discharge of Hazardous Waste	403.12(p)	§ 6.9	X			4.6	
<b>Other Reporting Requirements</b>							
k. Data Accuracy Certification & Authorized Signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14	X			3.8	
l. Record-Keeping Requirement (3 years or longer)	403.12(o)	§ 6.13	X			4.12	
- Including documentation associated with Best Management Practices <i>[NOTE: Required streamlining provision.]</i>	403.12(o)	§ 6.13	X			—	Does not apply
m. Submission of All Monitoring Data <i>[NOTE: Required streamlining revision]</i>	403.12(g)(6)	§ 6.4F	X			4.3.B	
n. Annual Certification by Nonsignificant Categorical Industrial Users <i>[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]</i>	403.3(v)(2)	§§ 4.7C & 6.14B	X			3.6 & 1.3.BG(3)(b)	

NONE = No revision necessary

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
2. Reporting Requirements [403.12]							
Types of Reports							
a. Baseline Monitoring Report	403.12(b)	§ 6.1	X			4.1	
(i) Identifying Information	403.12(b)(1)	§ 6.1B(1) & § 4.5A(1)a	X			4.1 & 3.7.A	
(ii) Other Environmental Permits Held	403.12(b)(2)	§§ 6.1B(1) & 4.5A(2)	X			4.1 & 3.7.B	
(iii) Description of Operations	403.12(b)(3)	§§ 6.1B(1) & 4.5A(3)a	X			4.1 & 3.7.C	
(iv) Flow Measurements	403.12(b)(4)	§§ 6.1(b)(2) & 4.5A(6)	X			4.1 & 3.7.D	
(v) Measurement of Pollutants	403.12(b)(5)	§ 6.1B(2)	X			4.1 & 3.7.E	
(vi) Certification	403.12(b)(6)	§ 6.1B(3)	X			4.1 & 3.7.F	
(vii) Compliance Schedule	403.12(b)(7)	§ 6.1B(4)	X			4.1 & 3.7.G	
b. Compliance Schedule Progress Report	403.12(c)	§ 6.2	X			4.4	
c. Report on Compliance with Categorical Pretreatment Standard Deadline	403.12(d)	§ 6.3	X			4.2	
d. Periodic Reports on Continued Compliance							
- From categorical users	403.12(e)	§ 6.4A	X			4.3.A	
- From significant noncategorical users	403.12(h)	§ 6.4A	X			4.3.A	
e. Notice of Potential Problems to be Reported Immediately (Including Slug Loads)	403.12(f)	§ 6.6	X			4.7	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. The ordinance should indicate that a user is required to develop a slug discharge control plan if determined by the POTW to be necessary.]</i>	403.8(f) (1)(B)(6)	§ 5.2A(7)	X			—	
k. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7	X			—	
l. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4	X			—	
m. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8	X			—	
n. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1	X			—	
o. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7	X			—	
p. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>			X			—	
<b>D. Required Reports</b>							
1. Develop Compliance Schedule for Installation of Technology	403.8(f) (1)(iv)	§§ 5.2b(2) & 10.4	X			4.4	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
c. Effluent Limits	403.8(f) (1)(B)(3)	§ 5.2A(3)	X			—	
d. Best Management Practices <i>[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§ 2.4C).]</i>	403.8(f) (1)(B)(3)	§ 5.2A(3)	X			—	
e. Self-Monitoring Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)	X			—	
f. Reporting & Notification Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)	X			—	
g. Record-Keeping Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)	X			—	
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[Note: Required only if POTW has incorporated the use of Pollutants Not Present and § 6.4 of the Model SUO.]</i>	403.8(f) (1)(B)(4) & 403.12(e) (2)	§ 5.2A(5)	X			—	
i. Statement of Applicable Civil and Criminal Penalties	403.8(f) (1)(B)(5)	§ 5.2A(6)	X			—	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
k. Specific Waived Pollutant <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1) (B)(4)	§ 5.2A(8)	X			—	Does not apply
l. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7	X			3.7 & 3.16	
m. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4	X			3.13	
n. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8	X			3.15	
o. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1	X			2.9	
p. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7	X			9.7	
q. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>			X			—	Does not apply
3. General Control Mechanism to Ensure Compliance <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated the use of General Permits (§ 4.6 of the Model SUO).]</i> - Permit Content	403.8(f)(1) (iii)(A)	§ 4.2 & 4.6	X			—	Definition of "General Permit" in 1.3.AA, but no further language
a. Statement of Duration	403.8(f)(1) (B) (1)	§§ 5.1 & 5.2A(1)	X			—	
b. Statement of Nontransferability	403.8(f)(1) (B)(2)	§ 5.2A(2)	X			—	

NONE = No revision necessary

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
d. Best Management Practices <i>[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§ 2.4 C).]</i>	403.8(f)(1)(B)(3)	§ 5.2A(3)	X			—	Does not apply
e. Self-Monitoring Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			3.10.A(4)	
f. Reporting & Notification Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			3.10.A(4)	
g. Record-Keeping Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	X			3.10.A(4)	
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4) & 403.12(e)(2)	§ 5.2A(5)	X			—	Does not apply
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B)(5)	§ 5.2A(6)	X			3.10.A(8)	
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. Where the POTW has determined that slug controls are necessary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)	X			2.12	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2	X			2.2	
4. Local Limits Development <i>[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]</i>	403.5(c) & (d)	§ 2.4	X			2.4	
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6	X			2.8	
6. Best Management Practices Development <i>[NOTE: Optional streamlining provision.]</i>	403.5(c)(4)	§ 2.4C	X			2.9.A	
<b>C. Control Discharges to POTW System</b>							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2	X			3.9	
2. Individual Control Mechanism (e.g., permit) to ensure compliance - <i>Permit Content</i>	403.8(f)(1)(iii)	§ 4.2	X			3 3.10	
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)	X			3.10.A(1)	
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§ 5.2A(2)	X			3.10.A(2)	
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)	X			3.10.A(3)	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH	X			1.3. B1	
16. Other definitions based on terms used in the POTW Ordinance							
<b>B. National Pretreatment Standards – Prohibited Discharges</b>							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A	X			2.1. A	
b. Pass Through	403.5(a)	§ 2.1A	X			2.1. A	
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60 °C or 140 °F flashpoint)	403.5(b)(1)	§ 2.1B(1)	X			2.1. B(1)	
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)	X			2.1. B(2)	
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)	X			2.1. B(3)	
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)	X			2.1. B(4)	
e. Heat; exceeds 40 °C (104 °F)	403.5(b)(5)	§ 2.1B(5)	X			2.1. B(5)	
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)	X			2.1. B(6)	
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)	X			2.1. B(7)	
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)	X			2.1. B(8)	

# CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: City of Everett

DATE OF REVIEW: 11/7/2018

Note: Several changes to the National Pretreatment Regulations made as a result of the 2005 revisions to the General Pretreatment Regulations (streamlining rule, 70 FR 60134-60198: October 14, 2005) are more stringent than the previous federal requirements and therefore are considered required modifications for the POTW. Therefore, to the extent that existing POTW legal authorities are inconsistent with those required changes, they must be revised. Where local authorities are already consistent with the required provisions, further changes are not necessary.

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A	X			1.3. B	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C	X			1.3. F	
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E	X			1.3. H	
4. Categorical Pretreatment Standard or Categorical Standard	403.6	§ 1.4 F	X			1.3. J	
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M	X			1.3. AF	
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL	X			1.3. AG &	1.3. BO
7. Interference	403.3(k)	§ 1.4 O	X			1.3. AI	
8. National Pretreatment Standard, Pretreatment Standard, or Standard	403.3(l)	§ 1.4 BB	X			1.3. AX	
9. New Source	403.3(m)	§ 1.4 T	X			1.3. AN	
10. Pass Through	403.3(p)	§ 1.4 V	X			1.3. AQ	
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA	X			1.3. AW	
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD	X			1.3. BA	
13. Significant Industrial User <i>(NOTE: §1.4 GG(3) is an optional streamlining provision for Nonsignificant Categorical Industrial User classification.)</i>	403.3(v)	§ 1.4 GG	X			1.3. BG	
14. Significant Noncompliance	403.8(f)(2)(vii)	§ 9 (A-H)	X			8	

**ATTACHMENT D: SITE VISIT DATA SHEET, WENDB DATA ENTRY WORKSHEET, PCA  
REQUIRED ICIS DATA ELEMENTS WORKSHEET, RNC WORKSHEET**

## SITE VISIT DATA SHEET

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: <u>Umbra Cuscinetti</u>					
Address of industry: <u>6707 Hardeson Road, Everett, WA 98204</u>					
Date of visit: <u>12/20/2017</u>			Time of visit:		
Name of inspector(s): <u>Biniam Zetelow, Ecology</u>   <u>Gene Bennett, City of Everett</u> <u>Gretchen Onstad, Ecology</u>					
Provide the name(s) and title(s) of industry representative(s)					
<b>Name</b>		<b>Title</b>		<b>Phone/E-mail</b>	
<u>Ryan Rayburn</u>		<u>EH &amp; S Manager</u>		<u>425 205-5180</u>	
IU Permit Number: <u>7737</u>		Exp Date: <u>July 31, 2018</u>		IU Classification: <u>40 CFR 433.17</u>	
Inspection Type/Purpose		Scheduled		Unscheduled	
<input checked="" type="checkbox"/> PCI				<input checked="" type="checkbox"/> PCA	
		New Company		Complaint	
Please provide the following documentation:					
1. Nature of operation: <u>Air craft parts / rods &amp; Gears</u>   <u>90% of business is with Boeing</u> <u>manufacturing</u>					
2. Number of employees		Number of shifts:		Hours of operation:	
<u>120</u>		<u>2</u>		<u>5am - 2am</u>	
3. Water source: <u>City of Everett</u>					
4. Wastestream flow(s) discharged to the POTW: <u>Waterjet cutter couple yrs ago</u> <u>- waste from Liquid Penetrant Inspection (LPI) room</u> <u>- Nitric/alcohol (NITAZ) etch - rinse water</u>					
Sanitary: (gpd)		Process: <u>400</u> (gpd)		Combined: (gpd)	
5. Describe any significant changes in process or flow: <u>None since the city's last inspection.</u>					
6. Type of pretreatment system (Describe): <u>pH neutralization</u> <u>- chems changed every 13 weeks or so.</u>					
Continuous flow		Batch		<input checked="" type="checkbox"/> Combined	
7. Condition/operation of pretreatment system (Describe): <u>The only pretreatment at this site is pH neutralization. The pH monitor was reading 0.0 during this inspection. Mr. Rayburn said he was going to have Whitney</u>					
Any unusual conditions or problems with the pretreatment system: <u>NO - except the pH monitor mal functioning.</u>   <u>come &amp; check the issue.</u>					

## SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used):</p> <ul style="list-style-type: none"> <li>- Waterjet cutter room - The machine is used to cut sector gears to specified shapes. Wastewater from here goes through a dual stage filter prior to the sump, about ~200 gpd.</li> <li>- LPI Lab - products are sent here for non-destructive inspection using HM-series penetrant dyes. Penetrant is applied to the test component by dipping.</li> <li>- NITAL Etch Lab - for checking machining damage or grinding burn.</li> </ul> <p><small>No categorical wastes from the LPI.</small></p>			
<p>9. Condition/operation of process area (Describe):</p> <p>Every process area and operation appeared optimal.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p>The rinse tanks are: cold water →  <math>\text{HNO}_3</math> → cold water → <math>\text{HCl}</math> → cold water →  <math>\text{NaOH}</math> → cold water → Hot water.              Wastewater from here is neutralized.</p> </div>			
<p>Any unusual conditions or problems with the process area: NO.</p>			
<p>10. General housekeeping in process area (Describe): NO issues observed during this PCI.</p>			
<p>Any unusual conditions or problems with general housekeeping in process area: NO.</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):</p> <ul style="list-style-type: none"> <li>- cutting oil, lubricants - in 55 gallon drums stored in shop floors</li> <li>- flammable materials - 5 gallon or smaller containers, stored in a chest flammable cabinet</li> <li>- Acid bases (<math>\text{HNO}_3, \text{NaOH}</math>) in Nital lab - 2 liter containers, stored in segregated cabinet.</li> </ul>			
Any floor drains?		Any spill control measures?	
NO		NO	
<p>General housekeeping of chemical storage area (Describe): The facility is immaculate in terms of general cleanliness and tidiness. Booms in front of doors is good idea.</p>			
<p>12. Are hazardous wastes drummed and labeled? Ingenium - manages the waste</p>			
<p>13. Does the IU have hazardous waste manifests? Yes</p>			
<p>Any problems associated with hazardous waste: NO.</p>			

### SITE VISIT DATA SHEET (Continued)

14. Solid waste production:	→ sludge minimization program in place → evaporate water using oven.			
Solid waste disposal method(s):	99% goal of haz waste reduction			
15. Description of sample location:	There is a sump at the lowest point of the process areas. All waste water is gravity drained to the sump. The city and the facility pump samples from the sump underneath the floor.			
Sampling method/technique:	composite samples are taken using an ISCO sampler.			
16. Evaluation of self-monitoring data:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If yes, was self-monitoring adequate:	The data is consistent with permit requirements and matches with what is submitted to the City.			
17. Who performs the self-monitoring analysis?	An accredited lab - Friedman and Bruya.			
Notes:				
<p>The facility appeared generally clean and wastewater management is performed at a high rate of compliance with the City issued permit. The EHS manager is very knowledgeable of all the processes generating waste - including wastewater and solid waste. All questions relating to the specifics of the permit, sampling techniques, and interpreting analytical results were properly answered.</p> <p>- The pH reading should be fully functional by now.</p>				