CITY OF PORT ANGELES
WASHINGTON, U. S. A.

Public Works & Utilities Department

March 23, 2021

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

RE: NPDES Permit Submittal S.6.A.5 Pretreatmcnt Report for Permit # WA0023973

Dear Ms. Cholski,

Enclosed please find the City of Port Angeles WWTP 2020 annual pretreatment program report as required by Special Condition S.6.A.5 of NPDES permit number WA0023973. If you have any questions, please feel free to contact me by phoning (360) 417-4690 or e-mailing twhite@cityofpa.us.

Respectfully,

Tyler White
Wastewater Treatment Plant Superintendent
City of Port Angeles

Cc: David Knight, Industrial Pretreatment Engineer, Dept. of Ecology
Greg Zentner, Supervisor, Municipal Operations Unit, Dept. of Ecology
File

\\Fs02.copa.cityofpa.us\docs\PWKS\Wastewater\Pretreatment\08 Environmental- NPDES Permit\Annual Reports\2020\2020 Annual Report\2020 Pretreatment Report Cover Letter.docx

Phone: 360-417-4800 / **Fax**: 360-417-4542
Website: www.cityofpa.us / **Email**: publicworks@cityofpa.us
321 East Fifth Street - P.O. Box 1150 / Port Angeles, WA 98362-0217

CITY OF PORT ANGELES
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM
2020 ANNUAL REPORT

TABLE OF CONTENTS

FORM	DESCRIPTION	PAGE
1	COVER SHEET	2
2	SUMMARY	3
3	POTW PLANT SAMPLING	6
4	LOCAL LIMIT EVALUATION	8
5	INDUSTRIAL USER SURVEY	9
6	INDUSTRIAL OVERSIGHT SUMMARY	10
7	ENFORCEMENT SUMMARY	12
8	USER COMPLIANCE COMPARISONS	13
9	RESOURCE SUMMARY	32
10	PRETREATMENT DATA SUMMARY	33

FORM 1
COVER SHEET

NPDES Permit Holder: City of Port Angeles

Report Submittal Date: 03 / 23 /2021

Period Covered by this Report: 01/01/2020 to 12/31/2020

Name of Wastewater Treatment Plant(s)	NPDES Permit Number
City of Port Angeles Wastewater Treatment Plant	WA0023973

Person to contact concerning information contained in this report:

Name: Tyler White

Title: Wastewater Treatment Plant Superintendent

Mailing Address: 321 E. 5th Street

Port Angeles, WA Zip: 98362-3206

Telephone Number: (360) 417-4690

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete.

Tyler White

03 / 23 /2021
Date

Wastewater Treatment Plant Superintendent
Title

NOTE: According to federal regulations at 40 CFR part 403, this form must be signed by a principal executive officer, ranking elected official or other duly authorized employee. The duly authorized employee must be an individual or position having responsibility for the overall operation of the facility or the Pretreatment Program. This authorization must be made in writing by the principal executive officer or ranking elected official, and submitted to the Approval Authority prior to or together with this report.

FORM 2
OPERATION ANNUAL SUMMARY

A. What were the major pretreatment related efforts in the reporting period? (Discuss efforts to revise program procedures to integrate regulatory changes as well as new efforts to find and control non-domestic discharges.)

- **Source Control Specialist (SCS) conducted ten annual (plus one follow-up) industrial user (IU) inspections in 2020 and collected monitoring samples at nine of the IUs in 2020 (one IU did not discharge at all in 2020).**

- **SCS screened 104 Certificate of Occupancy and/or Building Permit applications forwarded by the City's Department of Community and Economic Development. Of these only one warranted completion of the City's Industrial Wastewater Pretreatment Questionnaire and Disclosure Form, which was completed and submitted to the SCS. That user was not required to apply for an industrial wastewater discharge permit. Virtually all the Certificate of Occupancy and building permit applications were for residential projects or remodels of existing commercial buildings, with no new industrial facilities.**

- **Pretreatment program staff made 37 site visits to 29 food service establishments in 2020 to verify proper maintenance of grease interceptors to minimize the impacts of fats, oils and grease (FOG) on the City's sanitary sewer systems. Pretreatment staff also visited one dental clinic in Port Angeles to inform them of the EPA's requirement to submit a One Time Compliance Report for Dental Dischargers to the City's SCS. In 2020 the City received three such reports. Pretreatment program staff also visited one auto repair shop, three hotels, one adult homeless shelter, one industrial wood processor, one logging company, one asphalt paving company, two assisted living facilities, two grocery stores, and one trailer park to provide outreach and technical assistance regarding pollution prevention practices.**

B. What problems were there at the POTW(s) covered by this program? (Address any interference, odors, fumes, corrosion, overflows, or unusual conditions in the collection system or at the headworks that could be from non-domestic discharges. Briefly discuss actions taken to find the sources, correct the problems, and prevent recurrences for each.)

- **There were no incidents of interference, upset, or pass-through at the Port Angeles WWTP in 2020 that could be tied to non-domestic discharges. However, our peak influent concentrations of copper and zinc resulted in daily loads that exceeded our maximum allowable headworks loading (MAHL). Refer to Form 2, Section F for a description of the City's plan to trace the source(s) of these loads.**

C. What changes have occurred in the program or how it is administered during the period of this report? (Include a copy of each minor or substantial program modification adopted and whether and when any changes were previously submitted to Ecology for review/approval.)

- **There were no substantial changes to the administration of the City's pretreatment program in 2020. The City mailed printed and CD-R copies of its updated Industrial Wastewater Pretreatment Program Implementation Manual (dated Feb. 2020) to Ecology on 8/11/2020. Those copies were delivered 8/12/2020. The City mailed a review copy of the updated manual to Mr. Dave Knight on 2/13/2020 and e-mailed electronic copies of the final manual update to Mr. Knight on 12/8/2020.**

D. What future changes are being proposed for the program? (Include a copy of proposed change with this report noting whether each is a minor or substantial program modification. The POTW is also free to submit changes throughout the year as they are developed).

- **If the City can complete source tracing for the copper, cyanide, and zinc (Pollutants of Concern or POC) loadings in 2021, we hope to identify the industrial sources for those loads and control them with discharge permits. That will probably take the rest of 2021. Once those IUs are under permits it will take about a year of quarterly WWTP influent & effluent monitoring to determine if those permits have reduced headworks loading of the POCs.**

  If influent loading of POCs is not reduced well below the City's MAHLs by issuing IU permits to as-yet unidentified industrial dischargers, the City will have to recalculate its local limits for all users as found in P.A.M.C. chapter 13.06.045.

E. Were there any problems in funding or fully implementing the program?

- **Funding was not an issue. The program was implemented in 2020.**

F. What are the major concerns, findings, or conclusions of this report?

- **Form 4, Local Limits Validation, shows that except for copper and zinc, our maximum allowable headworks loadings (MAHL) for the local limits are below 20% of the MAHLs. However, the peak headworks loading for copper was 102% of its MAHL and the peak headworks loading for zinc was almost 119% of its MAHL.**

  A review of the City's WWTP influent monitoring data from 2016 to 2020 showed that zinc has had the most consistent elevated headworks loading (loading over 50% of the MAHL). Zinc has been over 50% of its MAHL in at least one quarter of every year between 2016 and 2020. The City's influent loading for copper and cyanide also exceeded 50% of their respective MAHLs in at least one quarter for three years between 2016 and 2020.

Based on these data and Mr. Knight's recommendations, the City's SCS and WWTP Superintendent have drafted a sampling plan to trace sources of elevated copper, cyanide, and zinc discharges in our collection system. Though the monitoring data do not show a strong pattern to the elevated influent loading, it tended to happen most often in the 2nd & 3rd quarter samples, typically in April and July. The SCS has identified five pump stations in mostly industrial areas of Port Angeles at which 24-hour composite samples will be collected for POCs on four consecutive weekdays in mid-April and mid-July. During these sampling windows, the WWTP headworks will also be sampled in the same way. We've chosen to collect composite samples at the pump stations to minimize the risk of missing a slug load, as we might if we only took grab samples.

If the sampling data show any sort of geographic pattern the SCS will narrow the search area to that quadrant and identify IUs there, conduct interviews and inspections, and distribute Industrial Wastewater Pretreatment Questionnaire and Disclosure Forms. Hopefully these data will identify a small group of IUs which should be monitored to see if their discharge could be causing the elevated headworks loadings of concern. If no strong candidates emerge during this search process, the subject quadrant(s) will be subdivided and the SCS will conduct additional sampling in those zones to further narrow the search.

G. What technical assistance, if any, is desired and how would it benefit the program?

The City's SCS would appreciate Mr. Knight's assistance in reviewing summaries of monitoring results from the POC tracing effort described above, and advice on identifying new IUs in our service area. This will help the SCS identify the source(s) of POC loading so the City can control and reduce those loads cost-effectively and without unfairly restricting discharges from the existing IUs that do not appear to be the source of those loads.

FORM 3
POTW PLANT SAMPLING SUMMARY

Parameter [1]	Detection Limit (mg/L) [2]	Number of Samples [3]	Average Influent Concentration (mg/L)	Primary Clarifier Effluent Concentration (mg/L) [4]	Average Final Effluent Concentration (mg/L) [5]	Average Removal (Percent)[6]	Average Dry Sludge Concentration (mg/kg) [7]	Comments
Antimony	1.00E-03	4	0.001040	Not sampled	0.000400	61.5%	1.01	
Arsenic	5.00E-04	4	0.001500	Not sampled	0.000500	66.7%	1.3875	
Barium	1.00E-03	0	Not sampled	Not sampled	Not sampled	No sample	Not sampled	Sampling not required by permit
Beryllium	5.00E-04	4	0.000015	Not sampled	0.000044	-195.0%*	0.425	See footnote.
Cadmium	2.50E-04	4	0.000898	Not sampled	0.000056	93.7%	2.325	
Chromium+6	3.00E-05	4	0.000010	Not sampled	0.000028	-180.0%**	0.12	See footnote.
Chromium	1.00E-03	4	0.006850	Not sampled	0.000650	90.5%	38.25	
Copper	2.00E-03	4	0.210475	Not sampled	0.018475	91.2%	671.25	
Cyanide	5.00E-03	4	0.009598	Not sampled	0.005543	42.3%	2.87075	
Lead	5.00E-04	4	0.011075	Not sampled	0.000440	96.0%	35.25	
Manganese	5.00E-03	0	Not sampled	Not sampled	Not sampled	No sample	Not sampled	Sampling not required by permit
Mercury	2.00E-07	4	Not sampled	Not sampled	Not sampled	No sample	0.9895	Infl. & effl. not sampled for reg. Hg
Mercury- Low	4.00E-07	4	0.000018	Not sampled	0.000005	71.1%	Not sampled	Biosolids not sampled for low Hg
Molybdenum	1.00E-02	4	0.002200	Not sampled	0.001175	46.6%	6.975	Sampling not required by permit, sampled for Local Limits only
Nickel	5.00E-04	4	0.006850	Not sampled	0.002575	62.4%	26.5	
Phenolics	5.00E-01	4	0.037000	Not sampled	0.039000	-5.4%**	7.7065	See footnote.
Selenium	1.00E-03	4	0.001775	Not sampled	0.000475	73.2%	2.8625	
Silver	2.00E-04	4	0.000898	Not sampled	0.000185	79.4%	4.175	
Thallium	3.60E-04	4	0.059760	Not sampled	0.000165	99.7%	1.2375	
Zinc	2.00E-02	4	0.367500	Not sampled	0.033425	90.9%	1259.5	

1 List ALL parameters limited by local limits, priority pollutant metals, metals regulated in 40 CFR 503, and priority pollutants detected in the influent.
2 Use detection limits at least as sensitive as provided for by 40 CFR part 136 (including use of EPA method 200.8).
3 Sampling requirements shall be in accordance with the POTW's NPDES permit. The results of all testing shall be included in this report, and shall be used in the computation of the average concentration levels. Monitoring barium and manganese is not required by the NPDES permit.

[4] Include this data if it is collected (this form does not require the inclusion of this data if it was not collected).

[5] When a pollutant detected in the influent is not detected in the effluent assume the effluent concentration is half the detection (practical quantitation) limit for purposes of calculating the removal rate. If the pollutant is found in neither the influent or effluent, consider that concentration to equal zero for both the influent and effluent.

[6] % Removal based on averages of all dates' samples = {[(average influent - average effluent) * 100%] / [average influent]}

* % Removal: In the case of beryllium, using half of the PQL (as recommended by Mr. Knight at Ecology) to replace ND (non-detect) effluent results, according to footnote 5 above, results in a negative % removal and creates the mathematical appearance of "making" beryllium. This is because the contract lab reports numerical results down to the MDL, which is 44 times lower than the PQL for beryllium. This happened in the third quarter of 2020.

** % Removal: In the case of hexavalent chromium and phenolics, the negative removal efficiency does not appear to have been caused by replacing "ND" results. A careful review of the hexavalent chromium and phenolic influent and effluent sampling results from 2016 – 2020 shows no consistent pattern to the occurrence of negative average removal efficiency for those pollutants. Both pollutants only showed this negative removal efficiency in two of the last five years, and never in consecutive years. These negative removal efficiencies do not appear connected to elevated influent levels for the pollutants, as there were several years with positive removal efficiencies when the peak influent concentration for that year was up to four times higher than in the years where there was a negative average removal efficiency. Since the second quarter of 2019 the City has been collecting hydraulically paired influent and effluent samples to improve the accuracy of our removal efficiency calculations. It is our opinion that due to several staggered process times and internal recycling of RAS and screw press filtrate it is impossible to collect influent and effluent samples which perfectly reflect the same batch of wastewater while excluding any influence from wastewater received at other times. At this time the Source Control Specialist does not believe these negative removal efficiencies warrant any further investigation.

[7] Take samples prior to final disposal and report as mg/kg of dry sludge (mg/kg = mg/l x 100% TSS).

FORM 4
LOCAL LIMIT VALIDATION

Average WWTP Influent Flow in Minimum Month: 1.47 MGD (August)											
Minimum Month Avg. Industrial: 0.047 MGD (August)[1]				Minimum Month Avg. Domestic: 1.423 MGD (August)[2]				Minimum Month Avg. I&I: 0.0 MGD (August)[3]			
Pollutant	Industrial Loading Calculations					Headworks Loading Calculations					
	Local Limit (mg/L)	Minimum Month Avg. Industrial Flow (MGD)	IU Loading in Minimum Month (lb./day)	Maximum Allowable Industrial Loading (MAIL) (lb./day)	% MAIL (IU Load / MAIL)	Peak Influent Concentration (mg/L)	Plant Flow (MGD) on peak sample date	Peak Headworks Loading (lb./day)	Maximum Allowable Headworks Loading (MAHL) (lb./day)	% MAHL (Load / MAHL)	Comments (Date of peak influent conc-entration)
Arsenic	0.21	0.047	0.08	0.38	21.9	0.003400	1.45	0.04	0.57	7.2	7/20/2020
Cadmium	0.14	0.047	0.06	0.25	22.2	0.002200	1.45	0.03	0.30	8.9	7/20/2020
Chromium	4.90	0.047	1.94	77.78	2.5	0.016700	1.45	0.20	77.91	0.3	7/20/2020
Copper	2.43	0.047	0.96	4.49	21.4	0.560000	1.45	6.78	6.64	102.0	7/20/2020
Cyanide	0.50	0.047	0.20	0.92	21.5	0.017700	1.45	0.21	1.09	19.6	7/20/2020
Lead	1.09	0.047	0.43	2.01	21.5	0.024300	1.45	0.29	2.16	13.6	7/20/2020
Mercury- Low	0.09	0.047	0.04	0.174	20.5	0.000052	1.43	0.00	0.18	0.3	10/5/2020
Molybdenum	0.17	0.047	0.07	0.318	21.2	0.006000	1.45	0.07	0.53	13.7	7/20/2020
Nickel	1.38	0.047	0.55	2.54	21.5	0.016800	1.45	0.20	2.64	7.7	7/20/2020
Selenium	0.86	0.047	0.34	1.58	21.6	0.003800	1.45	0.05	1.77	2.6	7/20/2020
Silver	0.85	0.047	0.34	1.56	21.6	0.002400	1.45	0.03	1.71	1.7	7/20/2020
Zinc	2.38	0.047	0.94	4.38	21.5	0.990000	1.45	11.98	10.10	118.6	7/20/2020

1 Industrial Flow = the sum of all IUs' daily average flows for the minimum month.

2 Domestic Flow = [(minimum month daily average flow) – (industrial flow)]

3 Inflow & Infiltration: wastewater utility user population and flows are assumed to be constant throughout the year. For any particular month, I&I is calculated by subtracting the minimum month's daily average flows from the daily average flows of the month in question. Therefore, during the minimum month, I&I = [(min. mo. daily avg. flow) – (min. mo. daily avg. flow)] = 0.

FORM 5
INDUSTRIAL USER SURVEYS RECEIVED IN 2020

Name of IU	Address	NAICS Codes for the processes	Categorical [1]? (Y/N)	Applicable Categorical Regulation	Is the IU Permitted [2]? (Y/N)	Source of Pollutant Limits [3]?	Reviewed Need for Spill Plan?	Spill Plan Required by Permit?	Note area for SIUs [4] else date survey done
Evan's Complete Automotive	1938 Ennis Cutoff Rd.	811111	No	N/A	N	N/A	Yes	N/A	11/09/20
		Comments: Non-significant industrial user. Referred to City's Local Source Control Partnership staff for technical assistance visit.							
		Comments:							
		Comments:							
		Comments:							
		Comments:							
		Comments:							

1 "Categorical IU" is any industrial wastewater discharger (user) subject to a Categorical Pretreatment Standard or Categorical Standard as listed in 40 CFR Part 403.6 & Parts 405 – 471.

2 Has the IU been issued a current wastewater discharge permit by the City of Port Angeles or any other jurisdiction?

3 Local Limits were adopted by the City of Port Angeles on 04/30/2010 (Ord. 3397), and are codified in the Port Angeles Municipal Code, Chapter 13.06.045.

4 "Significant IUs" are users whose average daily discharge exceeds 25,000 gallons per day, or those Categorical IUs subject to Pretreatment Standards for Existing Sources (PSES) or Pretreatment Standards for New Sources (PSNS).

FORM 6
INDUSTRIAL OVERSIGHT SUMMARY
(for all permitted facilities and un-permitted users in SNC status)

Name of IU	Permit issued	Permit expires	FREQUENCY OF MONITORING & INSPECTION PER YEAR [1]					Current Permit Status	SNC Status (Y/N) [2]	Permit Limit(s) Exceeded [3]
			Self-Monitoring	POTW Monitoring		POTW Inspection				
				2020	2021	2020	2021			
Assoc. Enviro. Group	10/18/2019	06/30/2020	2	1	0	1	0	Cancelled at Permittee's request	N	TSS (400 mg/L)[L]
City of Port Angeles Transfer Station	01/01/2017	12/31/2021	2	1	1	2	1	Current	N	No exceedance.
High Tide Seafoods	09/01/2020	08/31/2025	1	2	1	1	1	Current	N	BOD (400 mg/L)[L]. Permit allows surcharge in lieu of violation.
Olympic Laundry & Cleaners	09/01/2020	08/31/2025	1	1	1	1	1	Current	N	FOG (100 mg/L)[L]
Olympic Medical Center	09/01/2017	08/31/2022	1	1	1	1	1	Current	N	Flow (11,000 gpd, avg.)
Port of Port Angeles- Boat Haven	12/01/2016	11/30/2021	1	1	1	1	1	Current	N	No exceedance.
Port of Port Angeles- Marine Trades Ind. Park	03/01/2019	02/29/2024	1	1	1	1	1	Current	N	No exceedance.
Rayonier Adv. Mat'ls., Inc.- Mt. Pleasant Landfill	12/01/2020	11/30/2025	1	1	1	1	1	Current	N	No exceedance.
Sunrise Meats	07/01/2018	06/30/2023	1	1	1	1	1	Current	N	pH ($5 \leq$ pH)[F] Zinc (2.38 mg/L)[L]

Name of IU	Permit issued	Permit expires	FREQUENCY OF MONITORING & INSPECTION PER YEAR [1]					Current Permit Status	SNC Status (Y/N) [2]	Permit Limit(s) Exceeded [3]
			Self-Monitoring	POTW Monitoring		POTW Inspection				
				2020	2021	2020	2021			
U.S. Coast Guard	11/01/2017	10/09/2022	1	1	1	1	1	Current	N	Flow (200 gpd, avg.)
Westport Shipyard, Inc.	06/01/2017	05/30/2022	Each batch	No discharge	1	1	1	Current	N	No exceedance.

1. List the number of times the IU was required to sample most pollutants, disregarding those pollutants which are sampled continuously.
2. If the IU has been in Significant Non-Compliance (SNC) status during the past four quarters, mark "Yes" and use the following codes to identify the cause(s) of the SNC (List all codes that apply):
   - C) Compliance Schedule Milestones
   - L) Wastewater Discharge Limit violations
   - N) Not Accurately Reporting Noncompliance
   - O) Other Significant Violations
   - R) Failure to Sample as Required or Provide Reports When Due
3. For violations of permit limits, list the pollutant, the permit limit, and the code "L" if the pollutant is from Local Limits, and "F" if it is a Federal Standard.

FORM 7
ENFORCEMENT SUMMARY
(Number of Actions Taken)

IU [1]	Calls [2]	E-mails [2]	Meetings	Letters	Notice of violation	Penalties	Published in SNC [3]	Enforcement related to what violations?	Back in compliance by end of 2020?
Assoc. Enviro. Group		1	1					Exceeded TSS limit	No. Permit cancelled.
City of Port Angeles Transfer Station		1			1			DMR submitted after deadline. Permit renewal application & priority pollutants monitoring results not submitted by deadline.	Yes (DMR). No (application).
Olympic Laundry & Cleaners		5			1			Failure to collect FOG compliance samples. Failure to monitor pH weekly. BOD sampling results inconclusive. Permit renewal application not submitted by deadline. Exceeded FOG limit.	Yes (all).
Olympic Medical Center	1	1			2			DMR submitted after deadline. Exceeded flow limit. Failed to submit annual and semi-annual monitoring results.	Yes (DMR). No (flow & monitoring results)
Sunrise Meats			4		1			Failure to monitor pH monthly. DMRs submitted after deadline. Failure to submit annual & semi-annual monitoring results by deadline. Exceeded zinc limit. Failure to collect zinc compliance sample. pH limit violation. Failure to clean grease interceptor weekly and failure to document grease interceptor cleaning.	Yes (except grease interceptor maintenance)
U.S. Coast Guard Air Station Port Angeles	1	6			1			Exceeded flow limit. Explanation of discharge violation submitted after deadline.	Yes (flow). No (explanation).
TOTALS	**2**	**14**	**5**		**6**				

1 List only those IUs that required an enforcement response in this summary.
2 Estimated quantity of communications regarding violations or enforcement matters.
3 Attach the list of significant violators published in newspaper of general circulation.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Associated Environmental Group, Inc.**
Permit No. 2019-02
Permit Effective: 10/18/2019 through 07/23/2020 (last discharge was on 02/06/2020).

FLOW: Permitted for daily average of 35,000 gallons/day and daily maximum of 48,000 gallons/day.

Min. daily average flow: 30,744 gpd (January) Max. daily average flow: 32,146 gpd (February)
Daily average flow: 31,445 gpd
Total flow: 220,819 gallons

pH: low = 7.0 high = 9.5 Number of samples collected: 3
BOD: low = 1 high = 37 Number of samples collected: 3

Parameter	Units	Local /Permit Limits	Monitoring Frequency	Self Testing (01/08)	Plant Testing (01/08)	Self Testing (02/06)
Flow (avg.)	Gpd	35,000	Monthly	30,744	n/a	32,146
Flow (max.)	Gpd	48,000	Daily	35,129	n/a	42,200
TSS	mg/L	400	Weekly	2.5	26	740**
pH*	SU	5 - 11	Monthly	7	8.5	9.53
BOD	mg/L	400	Monthly	1	0.5	37
Turbidity*	NTU	x ≥ 26	Monthly	10.5**	16**	1440
TPH-G*	mg/L	0.251 ≤ x ≤ 0.44	Monthly	0.05**	0.05**	0.012**
TPH-D*	mg/L	0.251 ≤ x ≤ 10.0	Monthly	0.075**	0.1**	0.075**
BTEX*	mg/L	0.0021 ≤ x ≤ 0.20	Monthly	0.0002**	0.001**	0.0002**
Arsenic	mg/L	0.21	Monthly	0.00015	0.0023	0.0035
Cadmium	mg/L	0.14	Monthly	0.00025	0.00004	0.00025
Chromium	mg/L	4.90	Monthly	0.00025	0.001985	0.0006
Copper	mg/L	2.43	Monthly	0.00025	0.0103	0.012
Cyanide	mg/L	0.50	Monthly	0.005	0.018	0.005
Lead	mg/L	1.09	Monthly	0.00025	0.0069	0.161
Mercury	mg/L	0.09	Monthly	0.00025	0.0001	0.00025
Molybdenum	mg/L	0.17	Monthly	0.00025	0.00565	0.00025
Nickel	mg/L	1.38	Monthly	0.0075	0.002325	0.0075
Selenium	mg/L	0.86	Monthly	0.0125	0.00082	0.0125
Silver	mg/L	0.85	Monthly	0.0035	0.00115	0.0035
Zinc	mg/L	2.38	Monthly	0.00025	0.01115	0.0095

*= Minimum discharge limits were assigned for pH, turbidity, TPH-G, TPH-D, & BTEX to correspond to Dept. of Ecology surface water discharge standards so that if the discharge was eligible to be discharged under the permittee's Construction General Stormwater Discharge Permit, they would be required to cease discharge to the City's sanitary sewer system. This was in order to prevent the introduction of inflow to the sanitary sewer as required by Special Condition S.5.E of our NPDES permit and by P.A.M.C. 13.06.030.C (sewer use ordinance prohibitions). These limits were written in close consultation with Carol Serdar in Ecology's S.W. District office. The upper limits for these pollutants were based on Ecology's short term L.U.S.T. discharge standards found in Ecology's Permit Writer's Manual, Chapter 3, section 1.2, tables A-C.

**= See Narrative of Violations and Enforcement, next page.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

Jan. 8- Permittee's January DMR included the following note, "The results reflect the ability to discharge to storm however the lag between results and discharge schedule did not become apparent until it was time to continue excavation therefore due to high silt content and pH increase the ongoing week that was left we continued to sewer discharge since the mobile lab showed exceedances in pH and turbidity. Also we had our discussion about the TSS after the sampling was done this month and we only discharged for a few days in February so we fulfilled the cities request." No enforcement measures warranted.

Feb. 6- Discharge exceeded TSS limit on final day of discharge. Permittee's February DMR included the following note regarding the violation: ".... The exceedance of the TSS is due to the final turbid excavation of the gasoline contaminated soils and concurrent extraction that likely led to the higher than usual values." The permittee announced the completion of the project and the demobilization of all dewatering/extraction apparatus in the comments of the DMR, and requested termination of the discharge permit. Any enforcement response at this point would be moot.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **City of Port Angeles Transfer Station Facilities (P.S. 1 & P.S. 17)**
Permit No. 2017-01
Permit effective: 01/01/2017 through 12/31/2021

FLOW (combined): permitted for daily average of 90,000 gpd & daily maximum of 225,000 gpd

Min. daily average flow: 13,559 gpd (July) Max. daily average flow: 69,298 gpd (January)
Min. daily max. flow: 19,180 gpd (July) Max. daily max. flow: 206,444 gpd (December)

Total flow: 10,605,608 gallons

pH: low = 7.0 high = 8.7 Number of samples collected: 26
BOD: low = 4 high = 39 Number of samples collected: 6

Parameter	Units	Local / Permit Limits	Monitoring Frequency	Outfall 001 (Pump St. 1)			Outfall 002 (Pump St. 17)		
				Self Testing (05/19)	Plant Testing (10/01)	Self Testing (10/28)	Self Testing (05/19)	Plant Testing (10/01)	Self Testing (10/28)
Combined Flow (avg.)	gpd	90,000	Monthly	28,977 gpd (total flow/366 days) [1A]					
Combined Flow (max.)	gpd	225,000	Daily	75,457 gpd (avg. of daily max. flow for each month in 2020) [1A]					
pH	SU	5-11	Monthly	7.8 (average) [1A]			7.6 (average) [1A]		
BOD	mg/L	400	Semi-annual	5	39	32	6	4	8
COD	mg/L	n/a	Semi-annual	297	840	650	49	17	30
TSS	mg/L	400	Semi-annual	9	26	15	18	3	6
FOG	mg/L	100	Semi-annual	1.25	1.25	1.25	1.25	1.25	1.25
Ammonia	mg/L	n/a	Semi-annual	111	282	236	0.88	0.21	0.88
Arsenic	mg/L	0.21	Semi-annual	0.0059	0.0186	0.0171	0.00029	0.0001	0.0002
Cadmium	mg/L	0.14	Semi-annual	0.00002	0.00002	0.000125	0.00008	0.00004	0.000125
Chromium	mg/L	4.90	Semi-annual	0.0036	0.0138	0.0122	0.0002	0.0005	0.0005
Copper	mg/L	2.43	Semi-annual	0.0065	0.0095	0.0047	0.0174	0.0069	0.0092
Cyanide	mg/L	0.50	Semi-annual	0.019	0.022	0.02	0.003	0.0025	0.0025
Lead	mg/L	1.09	Semi-annual	0.00025	0.00034	0.00007	0.0018	0.00042	0.0009
Mercury	mg/L	0.09	Semi-annual	0.0001	0.0001	0.0001	0.0001	0.0001	0.0001
Molybdenum	mg/L	0.17	Semi-annual	0.0006	0.0034	0.0015	0.0005	0.0005	0.0005
Nickel	mg/L	1.38	Semi-annual	0.0028	0.0632	0.0689	0.00067	0.00025	0.001
Selenium	mg/L	0.86	Semi-annual	0.0065	0.023	0.0263	0.0005	0.0005	0.0004
Silver	mg/L	0.85	Semi-annual	0.00016	0.00011	0.0001	0.000085	0.00009	0.0001
Zinc	mg/L	2.38	Semi-annual	0.0039	0.009	0.005	0.0382	0.0105	0.0107
Priority Pollutants	See Appendix A of 40 CFR Part 423		Once per permit cycle	no sample in 2020					

1= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
A= No values during the year exceeded the local limit.
n/a= Not applicable. Permit requires monitoring of COD & ammonia but does not have discharge limits for those parameters.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

Mar. 23- Permittee submitted the January 2020 DMR by e-mail 37 days overdue. Due to staffing issues DF was not able to review the report until April 22. On April 22 DF delivered an NOV to the Solid Waste Division via interoffice mail.

Dec. 1- Condition S.8 of the permit required submission of permit renewal application with priority pollutant scans for both outfalls by Dec. 1, 2020. None of those materials have been submitted as of 1/15/2021, most likely due to permit signatory being on extended FMLA leave. DF e-mailed notice of the missed deadline and required materials, plus scans of previous application and the permit, to Eric Wheatley, Jason Paynter, Tom McCabe, Tyler White on 1/15/2021.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **High Tide Seafoods**
Permit No. 2020-03
Permit effective 09/01/2020 through 08/31/2025

FLOW: permitted for daily average of 10,000 gpd & daily maximum of 12,000 gpd

Min. daily average flow: 203 gpd (April) Max. daily average flow: 6,095 gpd (January)

Total flow: 739,109 gallons

pH: low = 6.5 high = 7.2 Number of samples collected: 14
BOD: low = 329 high = 403* Number of samples collected: 2

Parameter	Units	Local / Permit Limits	Monitoring Frequency	Plant Testing (09/16)	Self Testing (__/__)	Self Testing (09/23)
Flow (avg.)	gpd	10,000	Monthly	2,019 (total flow/366 days) [1A]		
Flow (max.)	gpd	12,000	Daily	Daily max. reporting waived		
pH	SU	5-11	Monthly	6.8 (average)[1A]		
BOD	mg/L	400	Semi-annual	403*	NS	329
TSS	mg/L	400	Semi-annual	106	NS	90
FOG	mg/L	100	Semi-annual	15.7	NS	11.7
Arsenic	mg/L	0.21	Annual	0.005	NR	0.0017
Cadmium	mg/L	0.14	Annual	0.0004	NR	0.00022
Chromium	mg/L	4.90	Annual	0.0053	NR	0.0015
Copper	mg/L	2.43	Annual	0.0552	NR	0.0199
Cyanide	mg/L	0.50	Annual	0.011	NR	0.005
Lead	mg/L	1.09	Annual	0.0032	NR	0.001
Mercury	mg/L	0.09	Annual	0.0001	NR	0.0001
Molybdenum	mg/L	0.17	Annual	0.001	NR	0.0005
Nickel	mg/L	1.38	Annual	0.005	NR	0.0011
Selenium	mg/L	0.86	Annual	0.0024	NR	0.0021
Silver	mg/L	0.85	Annual	0.00007	NR	0.0001
Zinc	mg/L	2.38	Annual	0.279	NR	0.132

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the local limit.
*= Permit limit for BOD is 400 mg/L, but allows for surcharge in lieu of a permit violation.
NR= Not required
NS= No sample collected. See Narrative of Violations & Enforcement, below.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

June 9- Dan Schleve telephoned DF to tell him that due to the COVID-19 pandemic's effect on their supply of fish and the Governor's Stay Home Stay Healthy order, they would be unable to collect their first semi-annual samples before June 30th. DF informed him on the phone that missing those samples was a permit violation & he'd need to collect those samples as soon as they began processing fish again.

June 18- DF phoned Dan Schleve and requested the missing DMRs from April and May. Dan said he'd have Virgil Laidig work on those DMRs and their permit renewal application the following day.

July 16- DF met with Dan Schleve & Virgil Laidig at their office to discuss their permit renewal application and their missing DMRs for April and May. Mr. Laidig stated that they had e-mailed them to DF on time, and provided photocopies of his originals, which were dated with dates that supported his statement. One of them had a misspelled e-mail address for the City's pretreatment program written on it, which further supported Mr. Laidig's statement. DF believed Mr. Laidig and decided not to pursue further enforcement action on the matter.

Sept. 16- BOD sample had a result of 403 mg/L, over the discharge permit threshold for the semi-annual surcharge. Surcharge cannot be calculated until after December 2020 water meter reading is recorded by City utility billing staff. DF will put a reminder in his Outlook calendar for early January to calculate the surcharge & bill HTS.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Olympic Laundry & Cleaners**
Permit No. 2020-02
Permit effective 09/01/2020 through 08/31/2025

FLOW: Permitted for daily avg. of 20,996 gpd (2,807 cu. ft./day) and daily max. of 21,999 gpd (2,941 cu. ft./day). (Flow limits written in cu. ft. / day at IU's request, since their water meter reads in cu. ft.)

Min. daily average flow: 5,053 gpd (May) Max. daily average flow: 15,369 gpd (September)

Total flow: 3,951,764 gallons

pH: low = 6.6 high = 11.0 Number of samples collected: 52
BOD: low = 69 high = 165 Number of samples collected: 4

Parameter	Units	Local / Permit Limits	Monitoring Frequency	Self Testing (03/01)	Self Testing (06/29)	Plant Testing (08/26, 10/21 & 10/22)	Self Testing (12/09)
Flow (avg.)	gpd	21,000	Monthly	10,797 gpd (total flow/366 days) [1A]			
Flow (max.)	gpd	22,000	Daily	Daily max. reporting waived			
pH	SU	5-11	Weekly	9.4 (average)[1A]			
BOD	mg/L	400	Semi-annual	>132*	91.2	165	69.3
TSS	mg/L	400	Semi-annual	238	NR	34	38
FOG	mg/L	100	Semi-annual	33.6	2.5	166[1D]	2.5
Arsenic	mg/L	0.21	Annual	0.125	NR	0.0002	NR
Cadmium	mg/L	0.14	Annual	0.005	NR	0.00037	NR
Chromium	mg/L	4.90	Annual	0.0035	NR	0.002	NR
Copper	mg/L	2.43	Annual	0.161	NR	0.0269	NR
Cyanide	mg/L	0.5	Annual	0.005	NR	0.008	NR
Lead	mg/L	1.09	Annual	0.04	NR	0.0024	NR
Mercury	mg/L	0.09	Annual	0.00025	NR	0.0001	NR
Molybdenum	mg/L	0.17	Annual	0.015	NR	0.0012	NR
Nickel	mg/L	1.38	Annual	0.024	NR	0.0015	NR
Selenium	mg/L	0.86	Annual	0.0125	NR	0.0005	NR
Silver	mg/L	0.85	Annual	0.037	NR	0.0001	NR
Zinc	mg/L	2.38	Annual	0.437	NR	0.0656	NR

1= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
*= Permittee's lab result couldn't confirm compliance with permit BOD limit. See Mar. 11 notes in Narrative of Violations & Enforcement, next page.
A= No values during the year exceeded the local limit.
D= Less than 2/3 of the values in the quarter exceeded the permit limit. See Aug. 26 & Oct. 21/22 notes in Narrative of Violations & Enforcement, next page.
NR= Not required.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

Jan. 31- Permittee failed to monitor FOG as required by NOV mailed 11/22/19 & clarified in e-mail on 11/26/19 from DF. In the January DMR, the permittee explained he was unable to collect FOG sample in January 2020 because of a death in the family which kept him out of town most of the month. He wrote that he would collect the FOG sample again in February along with his annual metals sample.

Feb. 29- Permittee's February DMR indicates he did not monitor FOG as required for compliance monitoring cited above. Both preceding failures to sample were not discovered by DF until 3/19/20 due to his being assigned to cover the WWTP lab half time beginning in early February 2020. NOV for these failures to conduct FOG compliance monitoring will be combined with NOV regarding failure to collect annual metals in 2019, to be mailed ASAP on or after 3/19/20.

Mar. 11- BOD sample results from lab did not demonstrate compliance with the 400 mg/L BOD limit, so permittee was instructed to resample some time in 2020 to satisfy annual monitoring requirement. Permittee indicated he would do so.

April- Due to COVID-19 permittee was unable to submit 2 of 4 weekly pH samples, but did resume regular weekly pH sampling in May. No enforcement measures warranted. DF e-mailed permittee that if he could collect another FOG sample in June, DF will consider the FOG monitoring complete despite the 2 month COVID-19 hiatus.

June 24- Permittee collected BOD and FOG samples to complete the 1st semi-annual monitoring requirements and satisfy the FOG compliance monitoring requirement. Both results were in compliance with the discharge limits.

Aug. 26- DF collected annual 24-hour composite sample and the FOG result was 387 mg/L, which violated the discharge limit of 100 mg/L. The BOD result was inconclusive due to the analytical results not meeting the QC requirements of at least 1 mg/L of D.O. remaining in the sample after 5 days.

Oct. 21 & 22- DF collected confirmation samples for FOG on both days & the results were below 100 mg/L, demonstrating a return to compliance with the FOG limit. DF collected a 24-hour composite BOD sample on 10/22/20 & its result was below the permit's discharge limit of 400 mg/L.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Olympic Medical Center**
Permit No. 2017-03
Effective 9/1/2017 through 8/31/2022

FLOW: Permitted for daily average of 11,000 gpd & daily maximum of 13,000 gpd
Sampling sites: 1 (boiler, 1st floor), 2 (boiler, basement), 3 (laundry), 4 (wet well)

Min. daily average flow: 6,487 gpd (May) Max. daily average. flow: 11,658[C] gpd (December)

Total flow: 3,288,871 gallons

pH: low = 6.0 (May, outfall 2) high = 9.6 (Oct., outfall 2 & 3) Number of samples collected: 39
BOD: low = 244 (Oct.) high = 244 (Oct.) Number of samples collected: 1

Parameter	Units	Sampling Site	Local / Permit Limits	Monitoring Frequency	Self Testing (__)/__)	Plant Testing (10/21)	Self Testing (__)/__)
					Outfall 4	Outfall 4	Outfall 4
Flow (avg.)	gpd	1-3	11,000	Monthly	8,986 (total flow/366 days) [1C]		
Flow (max.)	gpd	1-3	13,000	Monthly	Daily max. reporting waived		
pH	SU	1-3	5-11	Monthly	8.1 (average[1A])		
BOD	mg/L	4	400	Semi-annual	NS	244	NS
TSS	mg/L	4	400	Semi-annual	NS	88	NS
FOG	mg/L	4	100	Semi-annual	NS	34	NS
Arsenic	mg/L	4	0.21	Annual	NR	0.0001	NS
Cadmium	mg/L	4	0.14	Annual	NR	0.000125	NS
Chromium	mg/L	4	4.90	Annual	NR	0.0016	NS
Copper	mg/L	4	2.43	Annual	NR	0.2190	NS
Cyanide	mg/L	4	0.50	Annual	NR	0.0064	NS
Lead	mg/L	4	1.09	Annual	NR	0.0009	NS
Mercury	mg/L	4	0.09	Annual	NR	0.0001	NS
Molybdenum	mg/L	4	0.17	Annual	NR	0.0005	NS
Nickel	mg/L	4	1.38	Annual	NR	0.0027	NS
Selenium	mg/L	4	0.86	Annual	NR	0.0005	NS
Silver	mg/L	4	0.85	Annual	NR	0.0001	NS
Zinc	mg/L	4	2.38	Annual	NR	0.0605	NS

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the local limit.
[C]= Less than 1/3 of the values in the quarter exceeded the permit limit by 40%. See Narrative of Violations & Enforcement, next page.
NR= Not required.
NS= Not sampled. See Narrative of Violations & Enforcement, next page.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

Jan. - June- Due to the COVID-19 pandemic, OMC had to set up a respiratory triage tent at its entrance to screen patients. That tent was located over the wet well access cover for Outfall 004. JB requested a sampling deadline extension for the first semi-annual samples, which DF granted. By the time the tent was moved and the hatch became accessible there was no point in doing make-up sampling for the first semi-annual samples, so DF elected not to pursue enforcement.

Sept. 15- JB submitted the July DMR one month overdue. DF will mail NOV on 9/16/20.

Oct. 15- JB notified DF by e-mail that the sampling location for outfall 004 (wet well) was now accessible because the COVID-19 respiratory triage tent has been moved, and OMC is trying to schedule their sampling with their consultant. Because this sampling location was rendered inaccessible due to the national emergency caused by the COVID-19 pandemic, it does not make sense to pursue enforcement related to OMC's inability to sample outfall 004 during the first semi-annual period of 2020. The public health benefit of having that triage tent there far outweighed any detrimental effects of not sampling.

Dec. 31- OMC exceeded average daily flow by 6% in December & no annual or 2nd semi-annual sampling results included on December DMR. DF received the DMR on time, reviewed it on 1/19/21 following MLK, Jr. Day holiday & drafted NOV same day. DF e-mailed and telephoned JB on 1/20/21 requesting sampling data and lab reports. No reply received by morning of 1/21/21 so DF printed and mailed NOV to Jennifer Burkhardt, OMC's CHRO.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Port of Port Angeles- Boat Yard**
Permit No. 2016-03
Effective 12/01/2016 through 11/30/2021

FLOW: Permitted for daily maximum of 3,200 gpd (two 1,600-gallon batches)

Min. daily average flow: 0 gpd (January) Max. daily average flow: 197 gpd (June)

Total flow: 41,672 gallons

pH: low = 7.0 high = 9.5 Number of samples collected: 58
BOD: low = 1 high = 68 Number of samples collected: 3

Parameter	Units	Local/Permit Limits	Monitoring Frequency	Self Testing (05/14)	Self Testing (10/14)	Plant Testing (10/14)
Flow (avg.)	gpd	none	Batch	114 (total flow/366 days) [1A]		
Flow (max.)	gpd	3200	Batch	1,506 (average) [1A]		
pH	SU	5-11	Batch	8.6 (average) [1A]		
BOD	mg/L	400	Semi-annual	59	68	0.5
TSS	mg/L	400	Semi-annual	26	25	20
TPH	mg/L	100	Semi-annual	2.14	0.63	0.35
Copper	mg/L	2.43	Semi-annual	0.49	0.075	0.081
Zinc	mg/L	2.38	Semi-annual	0.032	0.032	0.031
Arsenic	mg/L	0.21	Annual	0.01	NR	0.0054
Cadmium	mg/L	0.14	Annual	0.0005	NR	0.00034
Chromium	mg/L	4.90	Annual	0.001	NR	0.0004
Cyanide	mg/L	0.50	Annual	0.025	NR	0.031
Lead	mg/L	1.09	Annual	0.0005	NR	0.0003
Mercury	mg/L	0.09	Annual	0.0001	NR	0.0001
Molybdenum	mg/L	0.17	Annual	0.008	NR	0.0039
Nickel	mg/L	1.38	Annual	0.0023	NR	0.0018
Selenium	mg/L	0.86	Annual	0.002	NR	0.0018
Silver	mg/L	0.85	Annual	0.0005	NR	0.0001

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the permit limit.
NR= Not required. Sampling only required once per year.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Port of Port Angeles Marine Trades Industrial Park (MTIP) washdown facility**
Permit No. 2019-01
Effective 03/01/2019 through 02/29/2024

FLOW: Permitted for daily average of 1,000 gpd & daily maximum of 5,000 gpd.

Min. daily average flow: 0 gpd (Aug. & June) Max. daily average flow: 372 gpd (September)

Total flow: 47,651 gallons

pH: low = 7.0 high = 8.7 Number of samples collected: 69
BOD: low = 3 high = 55 Number of samples collected: 3

Parameter	Units	Local / Permit Limits	Monitoring Frequency	Self Testing (03/10)	Self Testing (10/14)	Plant Testing (10/14)
Flow (avg.)	gpd	1,000	Monthly	130 (total flow/366 days)[1A]		
Flow (max.)	gpd	5,000	Daily	1,834 (average)[1A]		
pH	SU	5 - 11	Monthly	7.1 (average)[1A]		
BOD	mg/L	400	Semi-annual	2.5	55	44
TSS	mg/L	400	Semi-annual	9	12.5	11
TPH	mg/L	100	Semi-annual	0.29	2.02	0.6
Copper	mg/L	2.43	Semi-annual	0.017	0.44	0.351
Zinc	mg/L	2.38	Semi-annual	0.022	0.36	0.246
Chitosan Acetate	mg/L	0.20	Semi-annual	0.05	0.05	0.05
Arsenic	mg/L	0.21	Annual	0.0018	NR	0.0059
Cadmium	mg/L	0.14	Annual	0.0005	NR	0.0025
Chromium	mg/L	4.90	Annual	0.001	NR	0.0009
Cyanide	mg/L	0.50	Annual	0.025	NR	0.013
Lead	mg/L	1.09	Annual	0.0005	NR	0.0016
Mercury	mg/L	0.09	Annual	0.0001	NR	0.0001
Molybdenum	mg/L	0.17	Annual	0.0027	NR	0.0006
Nickel	mg/L	1.38	Annual	0.0024	NR	0.0035
Selenium	mg/L	0.86	Annual	0.002	NR	0.0034
Silver	mg/L	0.85	Annual	0.0005	NR	0.0001

1= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
A= No values during the year exceeded the local limit.
NR= Not required. Sampling only required once per year

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Rayonier Advanced Materials**
Permit No. 2020-01
Effective 12/01/2020 through 11/30/2025

FLOW: Permitted for daily maximum of 50,000 gpd (via 6,000-gallon tanker truck).

Min. daily average flow: 0 gpd (September) Max. daily average flow: 23,143 gpd (February)

Total flow: 4,284,000 gallons

pH: low = 6.0 high = 8.6 Number of samples collected: 41
BOD: low = 2 high = 10.4 Number of samples collected: 3

Parameter	Units	Local/Permit Limits	Monitoring Frequency	Self Testing (02/26)	Self Testing (08/27)	Plant Testing (08/27)
Flow (avg.)	gpd	none	Monthly	11,705 (total flow/366 days)[1A]		
Flow (max.)	gpd	50,000	Daily	36,000[1A]		
pH	SU	5-11	Weekly	7.0 (average)[1A]		
BOD	mg/L	400	Semi-annual	10.4	5.1	2
TSS	mg/L	400	Semi-annual	10	19	17
FOG	mg/L	100	Semi-annual	2.5	2.5	1.25
Arsenic	mg/L	0.21	Annual	NR	0.00105	0.001
Cadmium	mg/L	0.14	Annual	NR	0.00005	0.000125
Chromium	mg/L	4.90	Annual	NR	0.00106	0.0007
Copper	mg/L	2.43	Annual	NR	0.000735	0.0024
Cyanide	mg/L	0.50	Annual	NR	0.0025	0.0025
Lead	mg/L	1.09	Annual	NR	0.00005	0.00025
Mercury	mg/L	0.09	Annual	NR	0.00005	0.0001
Molybdenum	mg/L	0.17	Annual	NR	0.000548	0.0005
Nickel	mg/L	1.38	Annual	NR	0.00109	0.0024
Selenium	mg/L	0.86	Annual	NR	0.00025	0.0008
Silver	mg/L	0.85	Annual	NR	0.0001	0.0001
Zinc	mg/L	2.38	Annual	NR	0.002	0.0025

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the permit limit.
NR= Not required. Sampling only required once per year.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Sunrise Meats**
Permit No. 2018-01
Effective 07/01/2018 through 06/30/2023

FLOW: Permitted for daily average of 700 gpd & daily maximum of 1,300 gpd.

Min. daily average flow: 285 gpd (April) Max. daily average flow: 517 gpd (October)

Total flow: 140,410 gallons

pH: low = 4.6[C] high = 6.3 Number of samples collected: 12
BOD: low = 1.9 lb./day high = 2.9 lb./day Number of samples collected: 3

Parameter	Units	Local / Permit Limits	Monitoring Frequency	Self Testing (01/08)	Self Testing (08/03)	Plant Testing (09/29)
Flow (avg.)	gpd	700	Monthly	384 (total flow/366 days)[1A]		
Flow (max.)	gpd	1,300	Daily	Daily max. reporting waived.		
pH	SU	5-11	Monthly	5.7 (average)[1C]		
BOD	Lb./day	17.5	Semi-annual	1.87	2.90	2.48
TSS	Lb./day	5	Semi-annual	0.32	0.52	0.70
FOG	mg/L	100	Semi-annual	4	8.5	32.3
Arsenic	mg/L	0.21	Annual	NR	0.0018	0.0006
Cadmium	mg/L	0.14	Annual	NR	0.00067	0.00034
Chromium	mg/L	4.90	Annual	NR	0.0164	0.0048
Copper	mg/L	2.43	Annual	NR	1.97	0.973
Cyanide	mg/L	0.50	Annual	NR	0.008	0.053
Lead	mg/L	1.09	Annual	NR	0.373	0.11
Mercury	mg/L	0.09	Annual	NR	0.0001	0.0001
Molybdenum	mg/L	0.17	Annual	NR	0.0005	0.0009
Nickel	mg/L	1.38	Annual	NR	0.016	0.0073
Selenium	mg/L	0.86	Annual	NR	0.0007	0.0015
Silver	mg/L	0.85	Annual	NR	0.0001	0.00017
Zinc	mg/L	2.38	Annual	NR	3.71*	1.68

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the local limit.
[C]= Less than 1/3 of the values in the quarter exceeded the permit limit by 40%. See Narrative of Violations & Enforcement, below.
*= See notes for Aug. 3 - Oct. 2 in Narrative of Violations & Enforcement, below.
NR= Not required. Sampling only required once per year.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

April & May: Due to COVID-19 related restrictions, the permittee was forced to reduce staffing to a level which protected employee and customer health but did not allow for collection of monthly pH samples or submission

of monthly reports for the months of March, April, and May. DF instructed the permittee to inform him in advance if any future pandemic responses will require similar interruptions.

July: When permittee dropped of his July DMR, he informed D.F. that he sampled for his annual and 2nd semi-annual monitoring in July, but his shipper took 15 days to deliver the samples to his contract lab. He informed D.F. that he had just resampled that morning (Aug. 3rd).

Aug. 3: Permittee sampled for 2nd semi-annual and annual monitoring. Zinc concentration exceeded the local limit of 2.38 mg/L (result was 3.71 mg/L). The permittee was mailed a Notice of Violation requiring him to collect another wastewater sample and have it analyzed for zinc to confirm compliance, and submit those resampling results to DF within 30 days of receiving the NOV. Deadline for submission was 9/21/20.

Sept. 28 & 29: DF collected four grab samples of Sunrise Meats' effluent over 24 hours for annual monitoring. The zinc result was 1.68 mg/L, in compliance with the permittee's discharge permit limit for zinc.

Oct. 2: Permittee turned in pH sample, which had a value of 4.6 standard units. DF orally informed the Permittee that it was a permit violation. The Permittee also submitted a DMR covering both August and September, which did not include zinc resampling results. DF informed the Permittee that it was a permit violation to submit the August DMR a month overdue and fail to collect his zinc confirmation sample as instructed in the Notice of Violation from the City. DF informed the Permittee that due to the City's previously scheduled sampling at his business on 9/29/20, he was fortunate not to be required to resample zinc. DF also inquired why the business's grease interceptor maintenance log indicated they were only cleaning it every 3 to 6 months. The permittee stated that it gets cleaned much more frequently than shown on the written log (more like every 2-4 weeks). It's just that during cleaning the odor is so strong from the grease interceptor that by the time his staff have finished, they can't stand to be near the interceptor and forget to write the information on the log. DF recommended the permittee instruct his staff to fill out the maintenance log before beginning the cleaning.

Oct. 22: DF collected a pH sample from the Permittee's outfall 001, which had a pH reading of 6.27 standard units.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **U.S. Coast Guard Air Station / Field Office Port Angeles**
Permit No. 2017-04
Effective 11/01/2017 through 10/09/2022

FLOW: Permitted for daily average of 200 gpd & daily maximum of 1,000 gpd.

Min. daily average flow: 86 gpd (March) Max. daily average flow: 288[C] gpd (January)

Total flow: 54,516 gallons

pH: low = 7.0 high = 7.9 Number of samples collected: 5
BOD: low = 50 high = 173 Number of samples collected: 3

Parameter	Units	Local/ Permit Limits	Monitoring Frequency	Self Testing (01/17)	Self Testing (04/17)	Self Testing (07/08)	Plant Testing (09/30)	Self Testing (10/16)	Self Testing (11/23)
Flow (avg.)	gpd	200	Monthly	149 (total flows/366 days)[1C]					
Flow (max.)	gpd	6,000	Daily	Daily max. reporting waived					
pH	SU	5-11	Quarterly	7.9	7.8	7.6	7.0	7.8	NR
BOD	mg/L	400	Semi-annual	NR	NS	81	173	NR	50
TSS	mg/L	400	Semi-annual	NR	NS	130	16	NR	20
TPH	mg/L	100	Semi-annual	NR	NS	13.3	55.8	NR	22.4
Arsenic	mg/L	0.21	Annual	NR	NR	NR	0.0002	NR	0.0005
Cadmium	mg/L	0.14	Annual	NR	NR	NR	0.021	NR	0.019
Chromium	mg/L	4.90	Annual	NR	NR	NR	0.005	NR	0.0037
Copper	mg/L	2.43	Annual	NR	NR	NR	0.0574	NR	0.039
Cyanide	mg/L	0.5	Annual	NR	NR	NR	0.0025	NR	0.005
Lead	mg/L	1.09	Annual	NR	NR	NR	0.0039	NR	0.0049
Mercury	mg/L	0.09	Annual	NR	NR	NR	0.0001	NR	0.0013
Molybdenum	mg/L	0.17	Annual	NR	NR	NR	0.0013	NR	0.0012
Nickel	mg/L	1.38	Annual	NR	NR	NR	0.0026	NR	0.003
Selenium	mg/L	0.86	Annual	NR	NR	NR	0.0013	NR	0.004
Silver	mg/L	0.85	Annual	NR	NR	NR	0.0028	NR	0.0014
Zinc	mg/L	2.38	Annual	NR	NR	NR	0.0114	NR	0.22

[1]= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
[A]= No values during the year exceeded the local limit.
[C]= Less than 1/3 of the values in the quarter exceeded the permit limit by 40%.
NS= Not sampled. See Narrative of Violations & Enforcement, below.
NR= Not required. Sampling only required once per year.

NARRATIVE OF VIOLATIONS & ENFORCEMENT

Jan. 31- Bernard Mills reported that due to the extended sub-freezing weather in January, the wash rack hose was left trickling to prevent freezing damage. The wash pad drain opens to the sanitary sewer when the water supply is activated for the wash pad so that trickling hose water was discharged to the sanitary sewer, along with the snowmelt and rain that would normally have been discharged to the storm sewer during that time. Mr. Mills wrote that he will try to develop a way to frost-protect their washdown system without creating extra discharge. This discharge did not cause or contribute to any WWTP upset, pass through, or CSOs during this

period. D.F. telephoned Mr. Mills to acknowledge his notification and encourage him to look for other ways for hangar staff to frost protect the system without letting the hose trickle in freezing weather. No further enforcement required. The USCG returned to compliance with their average daily discharge limit in February 2020.

July 15- Bernard Mills submitted the June DMR with an e-mail notifying the City that he collected the 1st semi-annual samples on May 27, but due to a shipping problem the lab rejected the samples because they were outside the required hold time. He sampled again and shipped on June 30, but that sample was not shipped due to a waybill error outside his control. He sampled again on July 8 and included shipping confirmation in his e-mail. DF determined that he had shown ample good faith effort, and had accomplished the sampling. Other than requiring Mr. Mills to collect another semi-annual sample in 2020 to meet his monitoring requirements, DF decided that additional enforcement response would not result in any better outcome.

Nov. 30- In the November DMR Bernard Mills reported (on 12/16/20) that during November the permittee exceeded its average daily discharge limit by 13 gallons per day, caused by "misalignment of the system that resulted in increased rainwater intrusion."

Dec. 15- DF e-mailed a DMR reminder to the USCG and another permittee, telling them to request an extension if needed. That evening Mr. Mills e-mailed a request for a 1 day deadline extension.

Dec. 16- DF granted Mr. Mills' request first thing in the morning. Mr. Mills submitted the November DMR at 7:55 p.m. on 12/16/20. His e-mail included formal notification that the permittee exceeded the average daily discharge limit, per condition 2.F of the MIU permit. Mr. Mills also wrote of his intention to copy DF on a memo to his Command regarding the incident and related maintenance needs.

Dec. 17- DF e-mailed acknowledgement of the exceedance and noted it was a permit violation. He requested that Mr. Mills include in his memo what caused the exceedance and how he intends to prevent its recurrence. He also reminded Mr. Mills to prepare for cold weather freeze protection of the wash pad to prevent a repeat of the flow violation from January 2020 resulting from a hose left trickling (unnecessarily) to prevent freezing of the system.

Dec. 18- DF mailed a notice of violation to Captain Dean (Captain's correct address is Joan Snaith, CDR) of the U.S.C.G. requesting a letter explaining the cause of the violation and what steps the permittee was going to take to prevent future flow exceedances. A return receipt from the USPS showed the letter was delivered on 12/22/20. Deadline for response letter is 1/22/2021.

Jan. 15, 2021- DF e-mailed a reminder to Mr. Mills to include the Coast Guard's response letter with the December 2020 DMR.

Feb. 12, 2021- Mr. Mills e-mailed DF the January 2021 DMR with a copy of his memo to LCDR Harold N. Piper regarding the helicopter wash rack discrepancies and required repairs, with a note that the memo is in response to the City's NOV from Dec. 18, 2020. He noted that LCDR Piper is working with a Facilities Engineer to start corrective actions on the discrepancies noted in the memo.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **Westport, L.L.C.**
Permit No. 2017-02
Effective 06/01/2017 through 05/20/2022

FLOW: Permitted for maximum batch discharge of 1,300 gpd during wash down. No discharge in 2020.

Min. flow: 0 gpd (n/a) Max. flow: 0 gpd (n/a)

Total flow: 0 gallons

pH: low = n/a high = n/a Number of samples collected: n/a
BOD: low = n/a high = n/a Number of samples collected: n/a

Parameter	Units	Local/ Permit Limits	Monitoring Frequency	Self Testing (n/a)	Plant Testing (n/a)
Flow	gpd	1300	Batch *	No Discharge	No Discharge
pH	SU	5-11	Batch	No Discharge	No Discharge
BOD	mg/L	400	Batch	No Discharge	No Discharge
TSS	mg/L	400	Batch	No Discharge	No Discharge
FOG	mg/L	100	Batch	No Discharge	No Discharge
Arsenic	mg/L	0.21	Batch	No Discharge	No Discharge
Cadmium	mg/L	0.14	Batch	No Discharge	No Discharge
Chromium	mg/L	4.90	Batch	No Discharge	No Discharge
Copper	mg/L	2.43	Batch	No Discharge	No Discharge
Cyanide	mg/L	0.5	Batch	No Discharge	No Discharge
Lead	mg/L	1.09	Batch	No Discharge	No Discharge
Mercury	mg/L	0.09	Batch	No Discharge	No Discharge
Molybdenum	mg/L	0.17	Batch	No Discharge	No Discharge
Nickel	mg/L	1.38	Batch	No Discharge	No Discharge
Selenium	mg/L	0.86	Batch	No Discharge	No Discharge
Silver	mg/L	0.85	Batch	No Discharge	No Discharge
Zinc	mg/L	2.38	Batch	No Discharge	No Discharge

* Permit monitoring requirements only apply to vessel wash down water from the paint booth, not domestic wastes.

NARRATIVE OF VIOLATIONS & ENFORCEMENT
Permittee was closed due to COVID-19 from Mar. 26 to June 1st, and environmental staff was laid off, so unable to submit DMRs. No enforcement response necessary.

FORM 8
INDUSTRIAL USER COMPLIANCE COMPARISON

Name of IU: **BLANK TEMPLATE- NO DATA**

FLOW: Permitted for xxx gallons/day

Min. daily average flow: xxx gpd (month) Max. daily average flow: xxx gpd (month)
Daily average flow: xxx gpd
Total flow: xxx gallons

pH: low = xxx high = xxx Number of samples collected: xxx
BOD: low = xxx high = xxx Number of samples collected: xxx

Parameter	Units	Local/Permit Limits	Monitoring Frequency	Self Testing (Date)	Self Testing (Date)	Plant Testing (Date)
Flow (avg.)	gpd	xxx	Monthly	xxx (total flows/365 days)[1A]		
Flow (max.)	gpd	xxx	Daily	Daily max. reporting waived		
pH	SU	5-11	Monthly	xx (average)[1A]		
BOD	mg/L	400	Semi-annual			
TSS	mg/L	400	Semi-annual			
FOG	mg/L	100	Semi-annual			
Arsenic	mg/L	0.21	Annual			
Cadmium	mg/L	0.14	Annual			
Chromium	mg/L	4.90	Annual			
Copper	mg/L	2.43	Annual			
Cyanide	mg/L	0.50	Annual			
Lead	mg/L	1.09	Annual			
Mercury	mg/L	0.09	Annual			
Molybdenum	mg/L	0.17	Annual			
Nickel	mg/L	1.38	Annual			
Selenium	mg/L	0.86	Annual			
Silver	mg/L	0.85	Annual			
Zinc	mg/L	2.38	Annual			

NA= Not applicable.
ND= Not detected above the listed practical quantitation limit (PQL) or not above the Method Detection Limit (MDL), if requested. PQL= lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions.
NR= Not required. Sampling only required once per year.
1= If the IU sampled more frequently than quarterly, for this annual report average the data and list only this average. Footnote this value using the following key:
A= No values during the year exceeded the local limit.
B= Less than 1/3 of the values in the quarter exceeded the permit limit by 20%.
C= Less than 1/3 of the values in the quarter exceeded the permit limit by 40%.
D= Less than 2/3 of the values in the quarter exceeded the permit limit.
F= More than 2/3 of the values in the quarter exceeded the permit limit.
(If condition 'F' and 'B' or 'C' both apply, make two notations - e.g.: Zinc - $1.7^{B,F}$ mg/L
2= Address by sampling date (using footnotes) the response to any non-compliance shown above. For all violations list the date and result of the required resampling(s) as a footnote.

FORM 9
RESOURCE SUMMARY

LABOR (STAFF HOURS)	2020	2021 (Projected)	Comments
Pollution Prevention Outreach	312	520	LSC Partnership, WO# 142563
POTW Safety & Training	52.5	50	WO # 47257 & 47287
Laboratory	538	100	WO # 47271
Coordination & Supervision	1,093.5	1,380	WO # 47261 & 47282
Inspections	29	50	WO # 47283
Sampling & Testing	194	300	WO # 47284
Sick/Vacation/Holiday Leave	307	300	From SCS timecards
TOTAL HOURS 0.05 FTE (Wastewater Div. Superintendent) 1 FTE (Pretreatment Specialist) + 0.15 FTE (Pollution Prevention Specialist)	**2,526**	**2,700**	

OPERATING COSTS	2020	2021 (Projected)	Comments
Supplies[1]	$0	$0	Budget line 403-7480-535-3101
Program outreach/information[1]	$1,500	$1,500	Budget line 403-7480-535-4115
Laboratory analysis/testing[1]	$31,000	$31,000	Budget line 403-7480-535-4150
Training[1]	$750	$750	Budget line 403-7480-535-4310
Personnel- Lab Analysis	$26,791	$5,000	WO # 47271
Personnel- Coordination	$47,251	$68,750	WO # 47282
Personnel- Inspections	$1,445	$2,500	WO # 47283
Personnel- Sampling & Testing	$9,536	$15,000	WO # 47284
Personnel- Safety	$2,581	$2,500	WO # 47287
TOTAL COSTS	**$120,854**	**$127,000**	

INCOME REVENUE [2]	2020	2021 (Projected)	Comments	
Wastewater Division Total	$7,180,000	$7,190,900	Entire division, not just Pretreatment Program.	
			Basis for extra charges:	
			Flow ($_____/gal.)	
			COD ($_____/ lb.)	
			BOD ($0.79/1,000 gal.)	X
			TSS ($0.36/1,000 gal.)	X

1 Non-personnel operating costs for 2020 & 2021 are based on the projected budget for each year. A few pretreatment non-personnel expenses are specifically budgeted, but most are combined with other wastewater program and employee expenses and would be prohibitively difficult to separate. While this approach may not be sufficient for an audit, it does demonstrate ongoing levels of program funding.

2 The Wastewater Division budget does not specifically label all revenues that fund the pretreatment program, but several of the revenue lines, such as sewer permits & commercial leachate fees, fund the program.

FORM 10
ANNUAL PRETREATMENT PERFORMANCE SUMMARY

I. GENERAL INFORMATION

Control Authority Name: City of Port Angeles
Address: 321 E. 5th Street, Port Angeles, WA, 98362-3206
Contact Person: Tyler White, WWTP Supt. Contact Telephone # (360) 417-4690

NPDES No: WA0023973 Reporting Period: 01/01/2020 - 12/31/2020

II.	INDUSTRIAL USER COMPLIANCE	INDUSTRIAL USERS	
		Minor	Significant
1)	Total Number of Users by Category	9	1
2)	*CIUs categorized as nonsignificant CIUs	0	0
3)	IUs not sampling "pollutants not present"	0	0
4)	Users categorized as "Middle Tier" CIU's *	0	0
5)	Users Submitting DMRs/No. Required	9/9	1/1
6)	Users Sending 90-Day Reports/No. Required	0/0	0/0
7)	Users Submitting Semiannual Report/No. Required	0/0	0/0
8)	Users Meeting Compliance Schedules/No. Required-	0/0	0/0
9)	Total Users in SNC status	0	0
10)	Users in SNC with Standards/Limits/Reporting Violations	0/0/0	0/0/0
11)	Users in SNC with Self-Monitoring Violations	0	0
12)	Users in SNC with Self-Monitoring and Not Inspected or Sampled	0	0
13)	Users Not Inspected or Sampled- *Westport, LLC (no discharge)*	1	0
III.	COMPLIANCE MONITORING PROGRAM	INDUSTRIAL USERS	
		Minor	Significant
1)	Users with an unexpired Permit / Total	9/9	1/1
2)	Total Users Inspected in the period:	9	1
3)	Total POTW Sampling Visits Conducted	9	1
4)	Number of Facilities Sampled *(Westport, LLC did not discharge)*	8	1
5)	Limits for all EPA Recommended Pollutants? *Local limits do not include Sb, Be, Tl, or Phenols.*	No	No
6)	Local Limits / BMPs Codified? Y/N	Y/N	Y/N
IV.	ENFORCEMENT ACTIONS	INDUSTRIAL USERS	
		Minor	Significant
1)	Compliance Schedules Issued / Required	0/0	0/0
2)	Notices of Violations Issued to Users- *see Form 7*	5	1
3)	Administrative Orders Issued to Users	0	0
4)	Civil Suits Filed	0	0
5)	Criminal Suits Filed	0	0
6)	Users in SNC Status Published (attach the clipping of the list published in the newspaper)	0	0
7)	Penalties issued / $ Collected	0	0
8)	Other Punitive Actions: deny service, etc.	0	0

* = Requirement added in 2005 at 40 CFR 403.12(i)

I certify that the information contained is complete and accurate to the best of my knowledge.

Tyler White, Wastewater Treatment Plant Superintendent

03 / 23 /2021
Date