		State of Washington Department of Ecology WASTEWATER TREATMENT PLANT COMPLIANCE INSPECTION REPORT			Northwest Regional Office PO Box 330316 Shoreline, WA 98113 ph: (206) 594-0000 (rev. 5-28-21)	
Section A: General Information						
Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type	
<input checked="" type="checkbox"/> New <input type="checkbox"/> Changed <input type="checkbox"/> Deleted	WA0024490	08/18/2021	P	S	<input checked="" type="checkbox"/> 1 – Municipal	
Remarks						
Inspection work days	Facility Self-Monitoring	Photos Taken	Samples Taken	BI	QA	
3.0	N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N	N	
Lead Ecology Inspector(s) Maia Hoffman						
Section B: Facility Data						
Name, Location, and Phone of Facility Inspected City of Everett Industrial Waste Pretreatment Program 3200 Cedar St Everett, WA 98201				Entry Time	Permit Effective Date	
				9:00 am	11/1/2015	
				Exit Time	Permit Expiration Date	
				3:15 pm	10/30/2020	
Name(s)/Title(s) of On-Site Representative(s) Gene Bennett, Pretreatment Program Manager Charles Johnstone, Industrial Waste Inspector Ryan Wichert, Industrial Waste Inspector Anna Pennington, Industrial Waste Inspector				Other Ecology Staff On-Site		
Name, Address, Title, Phone, and Fax Number of Responsible Official Ryan Sass, Public Works Director City of Everett 3200 Cedar St Everett, WA 98201 Phone Number (425) 257-8201				Other Facility Data Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)						
<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)			
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Effluent ○ Receiving Water	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention			
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia			
<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other			

Section D: Summary of Findings/Comments

I. INTRODUCTION

This pretreatment program compliance inspection (PCI) was conducted in order to evaluate the City of Everett's compliance with state and federal requirements related to implementation of the City's delegated industrial wastewater pretreatment program during the calendar year 2019 and 2020. The inspection consisted of a review of industrial user permit files, including permits, inspection reports, self-monitoring reports, the City's sampling reports, slug discharge control plans, spill plans, and enforcement documents. The inspection also included interviews with pretreatment program inspectors and the manager. The inspection was announced to Gene Bennett.

A PCI Checklist is included as an attachment and is considered the bulk of the inspection proceedings. The following information provided in this document are only highlights from the inspection proceedings and any recommendations moving forward.

The Department of Ecology aims to conduct biannual PCIs of the City of Everett's (the City) Industrial Wastewater Pretreatment Program. The last PCI was conducted on April 15, 2018, for calendar year 2018, by Biniam Zelelow.

The City operates one wastewater treatment plant – Everett Water Pollution Control Facility (EWPCF) – and has interlocal agreements with Mukilteo, Alderwood, and Silver Lake Water Districts.

This PCI included a tour of the EWPCF. There have been no significant process modifications at the EWPCF, which would affect local limits, in the past two years.

II. RESULTS AND DISCUSSION

Summary of findings of this PCI

This PCI examined the City's industrial user (IU) control mechanisms, compliance monitoring, and enforcement. Ecology determined that the City is adequately implementing and enforcing all federal pretreatment standards and requirements in addition to any more stringent local requirements necessary to protect the EWPCF and its collection system.

City of Everett annual pretreatment report

The City's NPDES permit condition S6 requires it to submit an annual report documenting its pretreatment related activities. The report for calendar year 2019 was submitted electronically through the WQWebPortal on March 31, 2020. The report for calendar year 2020 was submitted electronically on March 29, 2021. The annual reports submitted for both calendar year 2019 and 2020 included all information required in the NPDES permit.

Industrial user file review

As part of this PCI, Ecology reviewed the permit files for Altasciences, Eckstrom Industries, Tyee Aircraft, Applied Technical Services, Aramark, and Snohomish County Cathcart Landfill. More information on these file reviews is available in the attached PCI Checklist.

Ecology also conducted site visits at Aramark and Snohomish County Cathcart Landfill. Inspection reports for these site visits are attached to this report.

Compliance and enforcement

The City determined that two IUs were in significant noncompliance in 2020 (Eckstrom Industries and Tyee Aircraft) for failure to submit permit required reports within 45 days (40 CFR Part 403.8(f)(2)(viii)(F)). Eckstrom Industries did not submit the annual non-significant categorical industrial user certification statement and Tyee Aircraft did not submit the annual zero discharge certification statement. No industrial users were in significant noncompliance in 2019.

The City follows a thorough enforcement response plan intended to keep IUs out of significant noncompliance. In regards to Eckstrom Industries and Tyee Aircraft, the City failed to notice that permit required reports were not submitted within the 45 day period. In the case of Eckstrom Industries, the IU did not submit the required annual report in 2017, 2018, or 2019. Therefore, the City decided to waive the typical fine associated with SNC, as outlined in the enforcement response plan. The City did publish the SNC designation in the Everett Herald as required in 40 CFR Part 403.8(f)(2)(viii). The City also implemented a tracking system for all permit required reports for all IUs to ensure timely follow up on late reports. Ecology considers this an appropriate corrective action.

Program modifications

The City made no modifications to the pretreatment program in 2019 or 2020. The City is in the process of updating the pretreatment ordinance, local limits, permit fee ordinance, and the program manual. G. Bennett stated that these modifications may be submitted to Ecology in 2021.



In addition, the City is implementing electronic reporting of self-monitoring data through their current database system, Linko. G. Bennett stated that roll-out of the tool was delayed due to COVID-19. However, the plan is to roll-out use of the electronic system to a couple of the larger IUs during 2021. This current phase does not authorize the City to accept electronic signatures, so IUs will need to continue sending in hard copy signed certification statements to support the electronic reporting.

III. CONCLUSION

Recommendations

1. Upcoming program modifications

The City has stated that several modifications of the pretreatment program are in the works. Ecology requests that when the City submits a program modification request that they include an opinion letter on whether the modification is considered substantial or non-substantial based on 40 CFR Part 403.18(b) and the reasoning behind that determination. Ecology will make the ultimate determination on the type (substantial or non-substantial) of modification and subsequent approval requirements, but a statement from the City will help expedite review.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425) 507-5681	9/8/2021
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Tonya Lane 	WA Dept. of Ecology, NWRO, (206) 594-0000	9/10/2021

ANNOUNCED Inspection

INSTRUCTIONS**Section A: General Information**

Report Version: N for 1st version, C for Changed or amended, or D for Delete

NPDES Permit No.: Enter the facility's NPDES or State permit number.

Inspection Date: Insert the date entry was made into the facility. Use the month/day/year format (e.g., 06/30/04 = June 30, 2004).

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	

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

C - Contractor or Other Inspectors (Specify in Remarks Columns)	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

Facility Type: Use one of the choices 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

Remarks: These columns are reserved for remarks.

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. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

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.

Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

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

Photos Taken: Yes or No

Samples Taken: Yes or No

Lead Ecology Inspector: Enter lead inspector's name

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), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

Section D: Summary of Findings/Comments

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary.

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

- Cover Page**
- ☒ Section I IU File Evaluation
- ☒ Section II Supplemental Data Review/Interview
- ☒ Section III Evaluation and Summary
- ☒ Attachment A Pretreatment Program Status Update
- ☐ Attachment B Pretreatment Program Profile
- ☐ Attachment C Worksheets
- ☐ WENDB Data Entry Worksheet
- ☐ RNC Worksheet
- ☒ IU Site Visit Report Form (Optional)
- ☐ File Review Worksheets (Optional)
- Attachment D** Supporting Documentation
2020 SNC public notification

CA name and address:

City of Everett - Public Works
 Industrial Wastewater Pretreatment Program
 3200 Cedar Street
 Everett, WA 98102

Date(s) of PCI

8/18/2021

Period covered by PCI

1/1/2019 - 12/31/2020

PIRT/DSS incorporated in NPDES permit?

Yes

No

X

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Maia Hoffman	Pretreatment Engineer/Ecology	(206) 594-0160 / (425) 507-5681

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
See inspection report above	*	

*Identified program contact

ACRONYM LIST**Acronym****Term**

BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full-Time Equivalent
FWA	Flow-Weighted Averaging
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base

SECTION I: IU FILE EVALUATION

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

NARRATIVE COMMENTS

FILE 7729 Industry name and address

Altasciences

Total flow (gpd)
only process flow permitted

Process flow (gpd)
30-50,000 gpd

Type of industry (products manufactured)
biological sciences (animal testing)

Industry visited during PCI

Yes ☐

No ☒

Applicable Federal
category

N/A - 403 only

Compliance status

- ☐ SNC (period: _____)
- ☐ Noncompliance/corrected
- ☒ Noncompliance/continuing

Comments

Documents reviewed?

- Permit (9/1/21-8/31/26)
- 2019 and 2020 violations (notices of noncompliance and notices of violation)
- 2020 compliance sampling results

The City sampled at the site twice during 2020 (3/12/20 and 11/4/20) and inspected once (11/3/20).

Altasciences has had numerous pH violation in 2019 and 2020. Wastewater at Altasciences is primarily generated from cleaning animal cages. Due to the chemicals and sanitizers used in cleaning, the wastewater is out of range of permit limits. Altasciences installed a pH adjustment tank in 2019 and a chopper pump in 2020 to address pH violations. The pretreatment system is still being optimized, so violations of pH are continuing.

The City issued numerous notices of violation (2019 - 3/25, 5/22, 7/2, 9/18, 10/21, 12/13) (2020 - 1/9, 4/9, 5/19, 7/17, 8/20, 9/22). The City also issued two administrative orders requiring actions to address pH violations on 12/31/19 and 5/19/2020. The City stated that Altasciences is responsive in sending notices of noncompliance and working with the City to come up with solutions to the pH violations.

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u>7738</u> Industry name and address		Total flow (gpd) Only process water permitted	Process flow (gpd) < 100 gpd
Eckstrom Industries		Type of industry (products manufactured) Metal finishing - blackening process	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category 433	Compliance status <input checked="" type="checkbox"/> SNC (period: <u>2020</u>) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments Documents reviewed: <ul style="list-style-type: none"> Significant noncompliance public notice 2020 NSCIU certification and pH log NOV (2/8/21) Permit (8/30/19-1/31/22) Eckstrom failed to submit the 2017, 2018, and 2019 annual nonsignificant categorical industrial user (NSCIU) certifications by 1/31 of each proceeding year. All NSCIU certifications were submitted on 9/2/2020. Eckstrom was considered in significant noncompliance due to the NSCIU certifications being over 45 days late. The City published the SNC notification in the Everett Herald on 3/30/21. The City waived the typical SNC fine due to their lack of timely follow up of late reports. A City compliance sample returned a copper result of 7.64 mg/L, violating a permit limit. Follow up sampling did not show repeated exceedance.			
FILE <u>7718</u> Industry name and address		Total flow (gpd)	Process flow (gpd) N/A
Tyee Aircraft (zero discharger)		Type of industry (products manufactured) aerospace	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Applicable Federal category 433	Compliance status <input checked="" type="checkbox"/> SNC (period: <u>2020</u>) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments Documents reviewed: <ul style="list-style-type: none"> SNC public notice The City issues zero discharge permits to metal finishing companies that conduct operations listed in 40 CFR 403 but that do not discharge any wastewater to the sewer system. Tyee Aircraft only generates a small amount of wastewater every year and elects to haul wastewater off site for disposal. Tyee Aircraft must submit a zero discharger certification every year on 1/31 for the preceeding year's operations. The 2019 certification was submitted on 9/2/2020. Since the submittal was over 45 days late, the facility was in significant noncompliance. The City published the SNC public notice in the Everett Herald on 3/30/21.			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u>215</u> Industry name and address		Total flow (gpd)	Process flow (gpd)
Applied Technical Services (ATS) Discharge Authorization		Type of industry (products manufactured) washing circuit boards	500-1,500 gpd
Industry visited during PCI	Applicable Federal category	Compliance status	
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A	<input type="checkbox"/> SNC (period: _____) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments <p>Documents reviewed:</p> <ul style="list-style-type: none"> Discharge authorization Notice of violation <p>An NOV was issued to the permittee on 3/12/21 for fraudulent reporting of sampling results. The City confirmed that the permittee is back on track and reporting results properly.</p> <p>The City may cancel this discharge authorization since the permittee installed a closed loop system and will likely not discharge anymore.</p> <p>This permit is not included in the evaluation table beginning on the subsequent pages. Focusing that review on the permitted discharges, not discharge authorizations.</p>			
FILE <u>7719</u> Industry name and address		Total flow (gpd)	Process flow (gpd)
Aramark		Type of industry (products manufactured) Industrial laundry	50,000-60,000 gpd
Industry visited during PCI	Applicable Federal category	Compliance status	
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	403	<input type="checkbox"/> SNC (period: _____) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments <p>Ecology conducted a site visit to Aramark with the City on 3/9/21. The inspection report is attached to the end of this document.</p>			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u>7701</u> Industry name and address Snohomish County Cathcart Landfill		Total flow (gpd)	Process flow (gpd) 144,000 gpd
		Type of industry (products manufactured) leachate (closed landfill) and vector truck discharge	
Industry visited during PCI Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category 403	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments Ecology conducted a site visit to the Snohomish County - Cathcart Landfill with the City on 3/30/21. The inspection report is attached to the end of this document.			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd) 50,000-60,000 gpd
		Type of industry (products manufactured) Industrial laundry	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category 403	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments <div style="font-size: 2em; margin-top: 20px;">BLANK</div>			

SECTION I: IU FILE EVALUATION (Continued)

Industry Name					INSTRUCTIONS: Evaluate the contents of SIU files. Indicate problem areas with an (✓). Use N/A (not applicable) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Leave the space blank when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.
Altasciences	Eckstrom	Tyee Aircraft	Aramark	SnoCo - Cathcart Landfill	
<u>File 7729</u>	<u>File 7738</u>	<u>File 7718</u>	<u>File 7719</u>	<u>File 7701</u>	<div>IU FILE REVIEW</div> <div>Reg. Cite</div>
					A. CA NOTIFICATION OF IU
					1. Notification of classification or change in classification 403.8(f)(2)(iii)
					2. Notification of applicable standards/requirements/RCRA 403.8(f)(2)(iii)
Comments No comment, all good.					

SECTION I: IU FILE EVALUATION (Continued)

File 7729	File 7738	File 7718	File 7719	File 7701	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
					a. Statement of duration (≤ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards)	
					d. Self-monitoring requirements	
					• Identification of pollutants to be monitored	
					• Sampling frequency	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan requirement	
Comments <p>All good. Each facility has a current permit. Most of the sections outlined in Part 2 above are standard language in permits. Compliance schedules are generally issued via administrative orders as followup to violations.</p>						

SECTION I: IU FILE EVALUATION (Continued)

File 7729	File 7738	File 7718	File 7719	File 7701	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Calculation and application of production-based standards	403.6(c)
					5. Calculation and application of CWF or FWA	403.6(d)&(e)
					6. Application of most stringent limit	403.8(f)(1)(ii)
Comments All good. Each facility reviewed has appropriate category applied. Local limits are applied to all non-categorical SIUs and to CIUs when the local limit is more stringent than the categorical limit.						

SECTION I: IU FILE EVALUATION (Continued)

File 7729	File 7738	File 7718	File 7719	File 7701	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	
					1. Sampling (once a year)	403.8(f)(2)(v)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis of results for all parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
					6. Inspection (once a year)	403.8(f)(2)(v)
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(v)
Comments						
<p>All good. The City's program requires inspection and sampling of SIUs (excluding zero dischargers and NSCIUs) on an annual basis. In exceedance of this, the City generally inspects and samples each SIU twice per year. During 2020, not all SIUs were inspected and sampled twice, but all were once, due to the COVID-19 pandemic. Permittees are evaluated for slug discharge potential, and therefore a need for a slug discharge control plan, with permit issuance or renewal.</p>						

SECTION I: IU FILE EVALUATION (Continued)

File 7729	File 7738	File 7718	File 7719	File 7701	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
	X	X			b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)

Comments

The City failed to recognize that Eckstrom (7738) and Tyee Aircraft (7718) did not submit permit required reports with the 45-day timeframe. Eckstrom is required to submit an annual NSCIU statement on 1/31 of each year. Eckstrom did not submit the required report for 2017, 2018, or 2019 by the due date (or within 45 days). Tyee Aircraft is required to submit a zero discharge statement on 1/31 of each year. Tyee did not submit the required report for 2019 by the due date (or within 45 days). The City failed to recognize the missing reports in a timely fashion. Therefore, the City waived the SNC fine that is outlined in their ERP due to their negligence on this matter. The City has implemented a process to track permit submittals to ensure proper actions, and enforcements as necessary, are taken in a reasonable timeframe.

All other requirements are adequately followed by the City. The City follows an ERP and related escalation of enforcement as necessary. In addition, the City properly reviews for and calculates SNC and publishes in the Everett Herald.

SECTION I: IU FILE EVALUATION (Continued)

File 7729	File 7738	File 7718	File 7719	File 7701	IU FILE REVIEW	Reg. Cite
					F. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b)&(d)
					4. Periodic self-monitoring reports	403.12(e)&(h)
					5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Submission of compliance schedule reports by required dates	403.12(c)
					8. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					9. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					10. Notification of hazardous waste discharge	403.12(j)&(p)
					11. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					12. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.						
					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	[403.5(a)(1)]
					• Spill or slug load	[403.12(f)]
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
	X	X			16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments						
SNC violations for Eckstrom and Tyee Aircraft described on the previous page.						

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	
Comments						
BLANK No further comments						

SECTION I COMPLETED BY: Maia Hoffman
TITLE: Pretreatment Engineer

DATE: 9/1/21
TELEPHONE: (425) 507-5681

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

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

Yes	No
-----	----

	X
--	---

If yes, describe.

There were no substantial modifications to the pretreatment program in 2019 or 2020.

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

Yes	No
-----	----

X	
---	--

If yes, describe.

In 2019, the City was in the early process of working on updating ordinances, new technically based local limits, and possibly a revised Program Manual for submittal to Ecology in 2021.

The City is also in the process of implementing full CROMERR compliant electronic reporting from their IUs through the Linko portal. This project rollout was delayed due to COVID-19, but the City is aiming to have at least the larger discharges reporting electronically by the end of 2021.

As of this PCI, the City has sent in draft revisions of the pretreatment ordinance, but this occurred in calendar year 2021.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

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

The City's IU inventory is continually updated. The annual reports state,
"We receive notices of new businesses from the City Clerk's office as well as the Engineering and Public Services Department. All agencies that we have inter-jurisdictional sewer treatment agreements with also include us in their notifications and permitting processes. Pretreatment staff members regularly survey new developments and construction areas for any possible new users and review commercial utility account information for water usage."

2. How many IUs are currently identified by the CA in each of the following groups? Based on 2020 annual reporting

a.	25	SIUs (as defined by the CA) [WENDB-SIUS]
	14	CIUs [WENDB-CIUS]
	11	Noncategorical SIUs
b.	8	Other regulated noncategorical IUs (specify)
c.	33	TOTAL

The City permits 8 IUs through discharge authorizations.

A permit was issued to Washington Marine Cleaning on 10/26/2020. Previously WMC was covered by a discharge authorization, however the City recharacterized the discharge as a centralized waste treatment facility under 40 CFR Part 437.

In addition, Dura Coatings, previously a zero discharge permit, was issued a new permit on 7/21/2020 as a metal finishing discharge under 40 CFR Part 433.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism? 25

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

0

%

If any, explain.

All SIUs are covered by an individual permit.

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

0

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

0

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

Evaluation is conducted during permit issuance or renewal.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?

N/A

Yes

No

X

If yes, identify the industries.

Not applicable. City of Everett Municipal Code 14.40.050 prohibits trucked or hauled pollutants (except for domestic sewage or septic tank wastes).

If no, explain.

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

Yes

No

X

If yes, identify and explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

E. COMPLIANCE MONITORING

1. Identify the following. Based on calendar year 2020

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs	1	2	All SIUs were inspected at least once, several were inspected twice.
• Other SIUs	1	2	
b. Sampling (by CA)			
• CIUs	1	2	All SIUs were sampled at least once, the majority were sampled twice.
• Other SIUs	1	2	
c. Self-Monitoring			
• CIUs			IU self-monitoring is outlined in their permit, the City will proceed with enforcement if any required monitoring is missed
• Other SIUs			
d. Reporting			
• CIUs			IU self-monitoring is outlined in their permit, the City will proceed with enforcement if any required reporting is missed
• Other SIUs			

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

- a. Not sampled or not inspected at least once [WENDB-NOIN]
- b. Not sampled at least once
- c. Not inspected at least once

If any, explain.

0	%
0	%
0	%

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use? For 2019 and 2020

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

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

Explain if appropriate.

Further explanation in the inspection report above.

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

N/A	Yes	No
	X	

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements for the most recent full quarter.

SNC Evaluation Period 2019 & 2020

2	8	%
0		%
0		%

Applicable pretreatment standards and reporting requirements

Self-monitoring requirements

Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	X

No SNC in 2019. In 2020, Tye Aircraft in SNC for submitting annual zero discharge certification statement late.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)			
4. Did the CA publish all SIUs in SNC in the largest daily newspaper in accordance with NPDES permit requirements? [403.8(f)(2)(vii)] If yes, attach a copy. SNC publications for Eckstrom Industries and Tyee Aircraft are attached at the end of this report. If no, explain.	Yes	No	
	X		
5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB-SNIN]	0		
6. a. Did the CA experience any of the following caused by industrial discharges?			
<ul style="list-style-type: none"> • Interference • Pass through • Fire or explosions (flashpoint, etc.) • Corrosive structural damage • Flow obstructions • Excessive flow rates • Excessive pollutant concentrations • Heat problems • Interference due to O&G • Toxic fumes • Illicit dumping of hauled wastes • Worker health and safety • Other (specify) 	Yes	No	Unk
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC-I]			
	Yes	No	
Not applicable.			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules?

0

b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date
DCI Powder Coating, Inc. on compliance schedule, started 8/2021 and to end 12/2021. Not in scope of this inspection which covers 2019-2020. Leaving in as note for future inspections.	

8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)]

If yes, identify and explain.

Yes No

X

9. Did the SIUs return to compliance by any of the following? [RNC-I]

a. Within 90 days

b. Within the time specified in the ERP

c. Through a compliance schedule

Yes No

X

G. ADDITIONAL EVALUATIONS

INSTRUCTIONS: Attach additional sheets as needed.

SECTION II COMPLETED BY: Maia Hoffman

TITLE: Pretreatment Engineer

DATE: 9/1/2021

TELEPHONE: (425) 507-5681

POTW REPRESENTATIVE

PROVIDING RESPONSES: See beginning of inspection report

DATE: Interviews conducted

TELEPHONE: on 8/18/21

SECTION III: EVALUATION AND SUMMARY

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

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

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
C. CONTROL MECHANISM EVALUATION (Continued)				
2. Ensure control mechanisms contents include: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 48%;"> a. A statement of duration b. A statement of nontransferability c. Effluent limits d. Self-monitoring requirements e. A statement of penalties </div> <div style="width: 48%;"> f. Compliance schedules g. Notice of slug loading h. Notification of spills, bypasses, upsets, etc. i. Notification of significant change in discharge j. 24-hour notification of violation/resample requirement </div> </div> <p style="margin-top: 20px;">No further requirements</p>	403.8(f)(1)(iii)	I.B.2.a-j		
D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS				
1. Apply all applicable pretreatment standards <p style="margin-top: 20px;">No further requirements</p>	403.8(f)(1)(ii); 403.5	I.C.1-6; II.D.2		
2. Evaluate the need for SIUs to develop slug discharge control plans <p style="margin-top: 20px;">No further requirements</p>	403.8(f)(2)(v)	I.D.9; II.D.1		
E. COMPLIANCE MONITORING				
1. Inspect and sample each SIU in accordance with approved program <p style="margin-top: 20px;">No further requirements</p>	Approved program	I.D.2&7; II.E.1		

SECTION III: EVALUATION AND SUMMARY (Continued)

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

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
E. COMPLIANCE MONITORING (Continued)				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months No further requirements	403.12(h)	I.F.2&5	<input type="checkbox"/>	<input type="checkbox"/>
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed No further requirements	403.12(l); 403.6(a)(2)(ii)	I.F.6	<input type="checkbox"/>	<input type="checkbox"/>
9. Receive notification of hazardous waste discharges No further requirements	403.12(j)&(p)	I.F.10; II.D.3	<input type="checkbox"/>	<input type="checkbox"/>
F. ENFORCEMENT				
1. Implement approved ERP Have a system to track required permit reporting , so the City, as the CA, can follow up on late reports before SNC is achieved. The City is already implementing a tracking system (no further action beyond this).	403.8(f)(5)	I.E.3; II.F.2	X	<input type="checkbox"/>
2. Annually publish a list of IUs in SNC No further requirements	403.8(f)(2)(vii)	I.E.5; II.F.4	<input type="checkbox"/>	<input type="checkbox"/>

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
F. ENFORCEMENT (Continued)				
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1,7&9		
No further action				
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	II.F.8		
No further action				
5. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge	403.12(d)	I.F.3		
No further action				
G. ADDITIONAL EVALUATIONS				

SECTION III COMPLETED BY: Maia Hoffman
TITLE: Pretreatment Engineer

DATE: 9/1/2021
TELEPHONE: (206) 594-0160

PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. It should be updated prior to each PCI based on information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

A. CA INFORMATION

1. CA name City of Everett		
2. a. Pretreatment contact Gene Gennett	b. Mailing address 3200 Cedar St, Everett, WA 98201	
c. Title Pretreatment Program Manager	d. Telephone number (425) 257-8240	
3. Date of last CA report to Approval Authority 3/29/2021		
4. Is the CA currently operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
		X
5. Effluent and sludge quality		
a. List the NPDES effluent and sludge limits violated and the suspected cause(s).		
Parameters Violated	Cause(s)	
b. Has the treatment plant sludge violated these tests?		
• EP toxicity	Yes	No
• TCLP		

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.			
	Last PCI Date: 4/15/19	Last Audit Date: 12/19/17	Program Report Date: 3/29/21
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	X		
k. Other (specify)			

As of the last PCI, the City did not have a pretreatment program manager. Gene Bennett was promoted into this role and an additional inspector was hired in 2020.

PRETREATMENT PROGRAM STATUS UPDATE (Continued)

B. PRETREATMENT PROGRAM STATUS (Continued)			
2. Is the CA presently in RNC for any of these violations? a. Failure to enforce against pass through and/or interference [RNC-I][SNC] b. Failure to submit required reports within 30 days [RNC-I][SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC-I][SNC] d. Failure to issue/reissue control mechanisms to 90 percent of SIUs within 6 months [RNC-II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC-II] f. Failure to enforce standards and reporting requirements [RNC-II] g. Other (specify) [RNC-II]	Data Source	Yes	No
			X
			X
			X
			X
			X
			X
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit (whichever is most recent).			
Name of SIU in SNC	Compliance Status	Source	
Tye Aircraft (zero discharger)	SNC - late certification statement	Annual report	
Eckstrom Industries	SNC - late NSCIU annual statement	Annual report	
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 performance report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the PCI.			
		SNC Evaluation Period	2020
2	8 %	Applicable pretreatment standards and reporting requirements	*SNC defined by:
	%	Self-monitoring requirements	POTW
	%	Pretreatment compliance schedules	EPA X
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program. No issues with implementing or enforcing pretreatment program.			

ATTACHMENT A COMPLETED BY: Maia Hoffman TITLE: Pretreatment Engineer	DATE: 9/1/2021 TELEPHONE: (425) 507-5681
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Public Notices

CITY OF EVERETT DEPARTMENT OF PUBLIC WORKS PUBLICATION OF SIGNIFICANT NON-COMPLIANCE WITH PRETREATMENT REGULATIONS

In compliance with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards, the City of Everett, Department of Public Works, is providing public notification of Industrial Dischargers which are or have been in Significant Non-Compliance regarding applicable pretreatment requirements during the period of January through December 2020.

Company Name: **AvtechTee, Inc.**
Address: 6500 Merrill Creek Parkway, Everett, WA 98203
Industry type: Metal Finisher
Violations of Effluent Standards:

AvtechTee, Inc. failed to submit the permit required annual Zero Discharge Certification for 2019. As the report was received more than forty-five (45) days late, AvtechTee is in Significant Non-Compliance for 2020 as defined by Federal Pretreatment Regulations.

Enforcement Actions Taken:

On October 13, 2020 the City issued a Notice of Violation and Significant Non-Compliance status to AvtechTee, Inc. Any person desiring to express their views or to be notified of the City of Everett's action on this issue should notify the City of Everett, Department of Public Works, Industrial Pretreatment, 3200 Cedar Street, Everett, WA 98201.

Jeff Marrs
Operations Superintendent
Published: March 30, 2021.

EDH923303

CITY OF EVERETT DEPARTMENT OF PUBLIC WORKS PUBLICATION OF SIGNIFICANT NON-COMPLIANCE WITH PRETREATMENT REGULATIONS

In compliance with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards, the City of Everett, Department of Public Works, is providing public notification of Industrial Dischargers which are or have been in Significant Non-Compliance regarding applicable pretreatment requirements during the period of January through December 2020.

Company Name: **Eckstrom Industries, Inc.**
Address: 2603 Hewitt Ave, Everett, WA 98201
Industry type: Metal Finisher
Violations of Effluent Standards:

Eckstrom Industries, Inc. failed to submit permit-required annual reports for 2017, 2018, and 2019. As reports were received more than forty-five (45) days late, Eckstrom Industries Inc. is in Significant Non-Compliance for 2020 as defined by Federal Pretreatment Regulations.

Enforcement Actions Taken:

On October 13, 2020 the City issued a Notice of Violation and Significant Non-Compliance status to Eckstrom Industries, Inc. Any person desiring to express their views or to be notified of the City of Everett's action on this issue should notify the City of Everett, Department of Public Works, Industrial Pretreatment, 3200 Cedar Street, Everett, WA 98201.

Jeff Marrs
Operations Superintendent
Published: March 30, 2021.

EDH923303

PUBLIC NOTICE

Vertical Bridge Development, LLC would like to place on notice the proposed construction of a 250-foot self-support tower known as Sultan (424.8 feet above mean sea level). If lighting is required the applicant will request the use of dual red/white, medium intensity lighting (but will ultimately use lighting/markings required by the FAA), located at 47°53'15.93" north latitude and -121°49'04.34" west longitude at near 124th Street Southeast, Sultan, Snohomish County, Washington 98294, ASR File #A1185042. The application for this proposed project can be viewed at www.fcc.gov/asr/applications by entering the ASR file number. If you have environmental concerns about the proposed structure, a Request for Environmental Review may be filed with the FCC at www.fcc.gov/asr/environmentalrequest or by writing to FCC Requests for Environmental Review, ATTN: Ramon Williams, 445 12th St SW, Washington, DC 20554. The FCC strongly encourages interested parties to file Requests for Environmental Review online. Requests for Environmental Review may only raise environmental concerns and must be filed within 30 days of the date that notice of the project is published on the FCC's website. If you have any concerns of any historic properties that may be affected by this proposed undertaking, please write to: Miles Walz-Salvador, Lottis Environmental, LLC, NEPA.NHPA@TheLottisGroup.com/ 6465 Transit Road - Suite 21, East Amherst, NY 14051-2232 or call (716) 276-8707. In your response, please include the proposed undertaking's location and a list of the historic resources that you believe to be affected along with their respective addresses or approximate locations. Published: March 30, 2021.

EDH923270

SNOHOMISH COUNTY COUNCIL Snohomish County, Washington NOTICE OF ENACTMENT

NOTICE IS HEREBY GIVEN, that on March 17, 2021, the Snohomish County Council adopted Ordinance No. 21-013, which will be effective on April 2, 2021. A summary is as follows:

Background: This ordinance streamlines financial reporting requirements for appointed officials and eliminate redundancy for elected officials and candidates in filing financial reports with two agencies. The amendments to Snohomish County Code (SCC) streamlines the disclosure process for appointed officials and allows the Auditor's Office to adopt financial disclosure forms to be filed with the County's Recording Division.

ORDINANCE NO. 21-013 RELATING TO THE CODE OF ETHICS; AMENDING CHAPTER 2.50 SCC

Section 1. Amends SCC 2.50.010 Definitions to insert the definition of "gift" or "thing of value", and the definition of "transaction with the county".

Section 2. Amends SCC 2.50.060 Filing of Reports to delete references relating that require elected officials to file reports to the Auditor's Office that are already filed with the Public Disclosure Commission; provide guidance on the filing process with the county auditor; describes the statement of financial interest reporting requirements; and updates the form name and method for providing the form to the appointee.

Public Notices

Section 3. Amends SCC 2.50.061 Modification of Reporting Requirements to update the modification code to apply only to appointed officials, and removes the provision allowing for an executive session of the Ethics Commission related to a modification request.

Section 4. Amends SCC 2.50.062 Reporting Modifications-Possible qualifications to update the possible reporting modification qualifications to align with information required on the reporting form for appointed officials.

Copies of the Ordinance: To request copies of the ordinance, please call 425-368-3494, 1-800-562-4367 x3494, TDD 1-800-877-8339; or e-mail Contact.Council@snoco.org. The ordinance is also available on the County webpage at <https://snohomishcountywa.gov/2134/Council-Hearings-Calendar>. Dated this 23rd day of March, 2021.

/s/ Elena Lao
Asst. Clerk of the Council
239857
Published: March 31, 2021.

EDH923353

Bids, RFQ's, RFP's

MUKILTEO SCHOOL DISTRICT

GC/CM Services

Submit Date: April 20, 2021 2:00 PM

REQUEST FOR PROPOSALS

(RFP)

MARINER HIGH SCHOOL RENOVATION

& ADDITION PROJECT

The Mukilteo School District will be accepting Proposals, including statements of qualifications, from capable General Contractor/Construction Manager ("GC/CM") firms or teams for the development and construction of the Mukilteo School District's Mariner High School Renovation & Addition Project, which is located at Mariner High School in Snohomish County.

The School District intends to award this Contract utilizing a competitive negotiation process authorized by RCW 39.10.

The Request for Proposals document may be obtained through the Mukilteo School District Capital Projects Office. Please email Shelly Henderson, Director of Capital Projects, hendersonsa@mukilteo.wednet.edu.

An informational pre-submission meeting will be held 2:00pm at Mariner High School, 200 120th St SW, Everett WA 98204, on April 9, 2021. Meet in front of the main office. All attendees will be required to sign a COVID attestation.

The proposal is due at 2:00 pm, April 20, 2021, at Mukilteo School District Support Services Center, Capital Projects Office, 8925 Airport Road, Everett WA 98204. DATED this 26th day of March 2021.

Shelly Henderson
Director of Capital Projects
Mukilteo School District

Published: March 30; April 6, 2021.

EDH923302

Request for Qualifications

Town of Darrington

The Town of Darrington is soliciting statements of qualifications for plan review and building inspection services of mass timber structural systems including the European wood, glued truss joints, and timber moment frames which incorporate Resilient Slip Friction Joints (RSFJ). Building inspections will include all disciplines required by international codes as well as Darrington ordinances related to, life, safety, structural systems, accessibility, mechanical, fire and plumbing systems. Plan review will include all meetings with the contractor and/or owner as well as revisions throughout the project. Experience with grant-funded projects is encouraged. Woman, Veteran and minority owned firms are encouraged to apply along with Snohomish County Small businesses. Please send Statement of Qualifications to Town of Darrington, P.O. Box 397, Darrington, WA 98241 or hand deliver to 1005 Cascade Street, Darrington, WA 98241. Deadline to apply is 4:00pm, April 2, 2021. The Town of Darrington is an Equal Opportunity Employer. For more information, the Town Clerk can be contacted at 360-436-1131 M-F 9-4. Dianne Allen, Clerk/Treasurer. Published: March 22, 23, 24, 25, 26, 27, 28, 29, 30, 31; April 1, 2, 2021.

EDH922669

Request for Qualifications

Town of Darrington

The Town of Darrington is soliciting statements of qualifications for engineering peer review of mass timber structural systems including the European wood, glued truss joints, and timber moment frames which incorporate Resilient Slip Friction Joints (RSFJ). Peer reviewers shall provide a peer review of the engineering design. Experience with grant-funded projects is encouraged. Woman, Veteran and minority owned firms are encouraged to apply along with Snohomish County Small businesses. Please send Statement of Qualifications to Town of Darrington, P.O. Box 397, Darrington, WA 98241 or hand deliver to 1005 Cascade Street, Darrington, WA 98241. Deadline to apply is 4:00pm, April 2, 2021. The Town of Darrington is an Equal Opportunity Employer. For more information, the Town Clerk can be contacted at 360-436-1131 M-F 9-4. Dianne Allen, Clerk/Treasurer. Published: March 22, 23, 24, 25, 26, 27, 28, 29, 30, 31; April 1, 2, 2021.

EDH922667

Request for Qualifications

Town of Darrington

The Town of Darrington is soliciting statements of qualifications for project and construction management services for civil construction of the Darrington Wood Innovation Center site. Woman, Veteran and minority owned firms are encouraged to apply along with Snohomish County Small businesses. Please send Statement of Qualifications to Town of Darrington, P.O. Box 397, Darrington, WA 98241 or hand deliver to 1005 Cascade Street, Darrington, WA 98241. Deadline to apply is 4:00pm, April 2, 2021. The Town of Darrington is an Equal Opportunity Employer. For more information, the Town Clerk can be contacted at 360-436-1131 M-F 9-4. Dianne Allen, Clerk/Treasurer. Published: March 22, 23, 24, 25, 26, 27, 28, 29, 30, 31; April 1, 2, 2021.

EDH922671

Bids, RFQ's, RFP's

CITY OF ARLINGTON INVITATION TO BID

Appliances

Fire Station 48, 4228 Airport Blvd, Arlington WA 98223

The City of Arlington is soliciting bids for appliances to equip the new Fire Station 48 being constructed at 4228 Airport Blvd, Arlington WA 98223. Bids are due by 2:00 pm on April 12, 2021. Bids received after such time and date will not be considered. Bids are to be submitted on the attached Bid Form and may be submitted by mail, in person, or by email to:

City of Arlington
Procurement and Contracting
238 N Olympic Ave
Arlington, WA 98223

Results of the bid will be posted on the City of Arlington website <http://arlingtonwa.gov> within 24 hours of bid opening. A public opening will not be held. Written technical questions relating to the bid should be directed to Debbie Strotz, Procurement/Contracts Analyst, at the above email address. Written questions will be accepted up to 72 hours before bid deadline.

Bids shall constitute offers to City of Arlington which shall be binding for thirty (30) days from the date of bid opening. City of Arlington reserves the right to reject any bid, any portion of any bid and/or to reject all bids. City of Arlington further reserves the right, but without obligation, to waive informalities and irregularities.

The City of Arlington reserves the right to award the purchase contract ("Purchase Contract") to the lowest responsive, responsible bidder as it best serves the interest of the City. The Bidder to whom the Purchase Contract is awarded shall execute and return the Contract to the City within ten (10) calendar days from the date the Bidder is notified of Notice of Award. Failure of the Bidder to execute the Contract, the Bidder shall be in default, and the City shall have the right to award the Purchase Contract to the next lowest responsive, responsible Bidder.

The City of Arlington, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises as defined at 49 CFR Part 26 will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

BID ITEMS

See Bid Form

All product delivery will be F.O.B. City of Arlington - Fire Station 48, 4228 Airport Blvd, Arlington, WA 98223.

COPIES OF BIDS AND BID PROTESTS

The city will post copies of the bids received at <http://arlingtonwa.gov>. In accordance with RCW 39.04.105, if the City receives a written protest from a Bidder, the City will not execute a contract for the project with anyone other than the protesting Bidder without first providing at least two (2) full business days' written notice of the City's intent to execute a contract for the project; provided that the protesting Bidder submits notice in writing of its protest no later than two (2) full business days following bid opening. Any protest must be made in writing, signed by the protesting Bidder or its authorized agent, and filed with the City's Procurement and Contracting Office, 238 N Olympic Ave., Arlington, WA 98223, with a copy to the City Attorney, Bailey, Duskin & Peitelle, 103 North Street, (PO Box 188), Arlington, WA 98223. The protest shall contain all of the following information:

- The protester's name, address, and phone/facsimile number;
- The bid number and bid project name;
- A detailed description of the specific factual and legal ground(s) for the protest, including all exhibits referenced by the protester; and
- The specific ruling and relief requested.

The City reserves the right to reject all bids as a remedy to a protest or independently of protests. Failure to comply with these procedures shall render a protest untimely or inadequate and, consequently, may result in the City rejecting the protest solely on this basis. Any decision made by the City regarding the bid award, contract execution or bid rejection shall be final, subject to such judicial review as permitted under Washington law upon timely filing in the Superior Court of Snohomish County, Washington. This venue clause shall modify any other provision in these Bid Documents to the extent there is an inconsistency.

BASIS FOR AWARD

Bidder shall provide itemized bid including delivery, installation and materials. Bid evaluations will be based on the lowest cumulative bid on Bid Form. Applicable sales tax will be added on invoices (current rate 9.2%), however it will not be used in evaluation of bids.

INSURANCE

- The delivery of said appliances in accordance with these specifications shall be understood to be the responsibility of the supplier, and the supplier shall maintain adequate insurance coverage to protect the City, its officers, agents, and employees from any claims for damages resulting from the delivery. Prior to delivery, the supplier shall provide proof to the City that it and its subcontractors are insured under a commercial general liability insurance policy covering the delivery within the scope of this solicitation, in adequate quantity to protect against legal liability arising out of contract activity, but no less than \$2,000,000 per occurrence, \$4,000,000 annual aggregate.
- In the event that product delivered pursuant to this solicitation involves the use of vehicles, either owned or non-owned by the Supplier and its subcontractors, automobile liability insurance shall be required. The minimum limit for automobile liability is \$2,000,000 per occurrence, using a Combined Single Limit for bodily injury and property damage. The Supplier shall provide proof to the City that it is insured under an automobile liability policy.
- The Supplier agrees to name the City, its agents, and employees as additional insureds when obtaining liability insurance and to provide an Accord Certificate of Insurance with proof of the Additional Insured endorsement to this effect within fifteen (15) calendar days of the issuance of the Purchase Order. All of the Supplier's policies shall be primary to any other valid and collectible insurance.

Published: March 29, 30, 31; April 1, 2, 2021.

EDH923262

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Cathcart Sanitary Landfill - Snohomish County					
Address of industry: 8915 Cathcart Way, Snohomish, WA 98296					
Date of visit: March 30, 2021			Time of visit: 10:00am - 11:00am		
Name of inspector(s): Department of Ecology - Maia Hoffman, Siana Wong, Kristi Floyd City of Everett - Ryan Wichert					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/E-mail	
Matt Lawless		Environmental Specialist			
Vian Salih		Environmental Monitoring Supervisor		vian.salih@co.snohomish.wa.us	
IU Permit Number: 7701-17		Exp Date: April 30, 2022		IU Classification: SIU	
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>
Please provide the following documentation: 1. Nature of operation: Treat landfill leachate from a closed landfill and vector truck discharge. Vector truck discharge primarily from county storm sewer cleanouts.					
2. Number of employees		Number of shifts:		Hours of operation:	Continuous
3. Water source: Silver Lake Water and Sewer District					
4. Wastestream flow(s) discharged to the POTW: Landfill leachate and vector truck discharge.					
Sanitary: 144,000 (gpd)		Process: 144,000 (gpd)		Combined: 144,000 (gpd)	
5. Describe any significant changes in process or flow: The landfill was closed in 1992, the leachate production has been fairly consistent since closure. There are generally higher leachate flows in the winter versus the summer. Vector truck discharge increases during the summer months.					
6. Type of pretreatment system (Describe): Headworks with screening followed by aerated lagoons. The vector truck discharge dewatering water is sent to the headworks, solids are dried out and disposed of in landfill. The leachate is pumped directly to the lagoons.					
<input checked="" type="checkbox"/>	Continuous flow		<input type="checkbox"/>	Batch	
<input type="checkbox"/>			<input type="checkbox"/>	Combined	
7. Condition/operation of pretreatment system (Describe): In good operation.					
Any unusual conditions or problems with the pretreatment system: No					

SITE VISIT DATA SHEET (Continued)

8. Process area description (identify raw materials and processes used):

Landfill leachate is constant, there are no changes to this wastestream. The vector truck discharge is managed to prevent discharge of unknown liquids. Companies/trucks discharging to the dump station must have a permit to discharge.

9. Condition/operation of process area (Describe):

Organized

Any unusual conditions or problems with the process area:

No

10. General housekeeping in process area (Describe):

Organized. The leachate and vector truck discharge treatment plant is located on County property that houses multiple departments. Only the leachate and vector truck discharge wastewaters are routed to the treatment system. Stormwater is covered under the Municipal Stormwater General Permit issued to Snohomish County.

Any unusual conditions or problems with general housekeeping in process area:

No

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):

N/A

Any floor drains?

N/A

Any spill control measures?

Spill kits are placed around the site.

General housekeeping of chemical storage area (Describe):

12. Are hazardous wastes drummed and labeled? N/A

13. Does the IU have hazardous waste manifests? N/A

Any problems associated with hazardous waste:

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:

Solids generated from dewatering of vector truck discharges, grit from screening at headworks, minimal sludge cleaned out biannually from each lagoon.

Solid waste disposal method(s):

All solid waste produced from the wastewater treatment is nonhazardous and is disposed of in a landfill.

15. Description of sample location:

Multiple sampling locations throughout the site. The compliance sampling location for permit required monitoring is located after all treatment and is designated as P-MH-9.

Sampling method/technique: Both composite and grab.

16. Evaluation of self-monitoring data:	<input type="checkbox"/>	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A
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If yes, was self-monitoring adequate:

17. Who performs the self-monitoring analysis?

Personnel in the environmental monitoring unit.

Notes:

This permittee is in good compliance standing.

Ecology took samples for several non-permitted (no effluent limits) parameters during this visit. Results will be transmitted to Snohomish County separate from this report since they are not compliance related.

This report was authored by Maia Hoffman, P.E., Washington State Department of Ecology, NWRO pretreatment engineer, on 4/13/2021.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Aramark					
Address of industry: 7200 Hardeson Rd, Everett, WA 98204					
Date of visit: 3/9/2021			Time of visit: 10am-11:45am		
Name of inspector(s): Department of Ecology - Maia Hoffman, Siana Wong, Kristi Floyd City of Everett - Charles Johnstone, Gene Bennett					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/E-mail	
Keith Okeson		Maintenance Manager		keith-okeson@aramark.com	
Tom Dikos		Environmental Compliance Manager		dikos-tom@aramark.com	
IU Permit Number: #7719-17		Exp Date: 5/14/2022		IU Classification: SIU (non-CIU)	
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>
PCA Complaint					
Please provide the following documentation:					
1. Nature of operation: Industrial laundry primarily for manufacturing, food, and medical industries.					
2. Number of employees	110	Number of shifts:	1	Hours of operation:	5am-1:30pm
3. Water source: City of Everett					
4. Wastestream flow(s) discharged to the POTW: Industrial laundry machines using different types or volumes of detergents and cleaners depending on the product mix in the machine.					
Sanitary:		(gpd)	Process:	50,000-60,000 (gpd)	Combined: (gpd)
5. Describe any significant changes in process or flow: N/A					
6. Type of pretreatment system (Describe): Wastewater flows through screening to remove lint and other solids then into a 36,000 underground equalization (EQ) tank equipped with a mixer. From the EQ tank, wastewater flows through a long length of winding pipe in which coagulant is added and mixed in before entering the DAF tank. Wastewater then flows to an effluent holding tank where CO2 can be injected for pH control as needed prior to discharging to the sewer.					
<input checked="" type="checkbox"/>	Continuous flow		<input type="checkbox"/>	Batch	
<input type="checkbox"/>			<input type="checkbox"/>	Combined	
7. Condition/operation of pretreatment system (Describe): In good operation. The treatment system was upgraded in 2017 to include the EQ tank mixers and DAF tank. The treatment system is only operating and discharging when personnel are present and the laundry operations are occurring.					
Any unusual conditions or problems with the pretreatment system: No					

SITE VISIT DATA SHEET (Continued)

8. Process area description (identify raw materials and processes used):

Numerous laundry machines of varying capacity ranging fro 200 - 650 gallons. The vast majority of the wastewater is generated from the laundry machines with a small amount from the boiler. Otherwise, process areas include sorting, steaming, ironing, and folding area, which do not generate any wastewater.

9. Condition/operation of process area (Describe):

In good condition, very clean.

Any unusual conditions or problems with the process area:

No

10. General housekeeping in process area (Describe):

Very clean, no standing water present. Organized.

Any unusual conditions or problems with general housekeeping in process area:

No

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):

Laundry detergents and other cleaning chemicals along with bulk wastewater treatment chemicals are stored in the chemical storage room. The room is equipped with a berm and a 10,000 gallon underground containment tank. Some of the chemicals are stored on additional containment pallets.

Any floor drains?

No

Any spill control measures?

Yes

General housekeeping of chemical storage area (Describe):

Clean and organized.

12. Are hazardous wastes drummed and labeled? N/A, no hazardous waste generated at this site.

13. Does the IU have hazardous waste manifests? N/A

Any problems associated with hazardous waste:

N/A

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:			
Solid waste is generated from wastewater screening and sludge from the DAF tank.			
Solid waste disposal method(s):			
Above mentioned wastes are non-haz and are disposed of as solid waste through a waste hauler.			
15. Description of sample location:			
Sampling conducted at the Parshall flume right outside the WWTP fence.			
Sampling method/technique: Composite and grab			
16. Evaluation of self-monitoring data:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
If yes, was self-monitoring adequate:			
Yes			
17. Who performs the self-monitoring analysis?			
Analysis conducted by ALS Environmental Laboratory			
Notes:			
<p>Aramark subcontracts the cleaning of solvent-contaminated laundry to Hunt Cleaners, located in Nebraska and Iowa. No solvent rags or other solvent-contaminated laundry are processed at this site.</p> <p>Due to COVID, there has been a reduction in hours worked, number of shifts, and subsequently, volume of wastewater discharged. Production has started to rebound through the end of 2020 and early 2021, but is not yet back to pre-COVID levels.</p> <p>Ecology reviewed Aramark's October 2020 self-monitoring report (SMR), provided by City of Everett. Aramark samples monthly for metals, cyanide, mercury, BOD5, TSS, polar and nonpolar FOG, and flash point. Aramark records the flow and pH daily. The SMR showed,</p> <p>*No exceedance of metals, cyanide, mercury, pH, or flash point limits.</p> <p>*Exceedance of nonpolar FOG limit on 10/8/20, results received on 10/23/20. The discharge had a nonpolar FOG value of 220 mg/L, the maximum daily limit is 200 mg/L. Aramark communicated the exceedance to the City of Everett on 10/23/20 when they became aware, sent a notice of noncompliance report on 10/26/20 including corrective actions taken, and resampled the discharge on 10/26/20 for nonpolar FOG which showed the discharge back in compliance with the limit. City of Everett issued an NOV to Aramark on 11/9/20 for this exceedance. Appropriate actions were taken by all parties. Aramark has been in compliance with this nonpolar FOG limit since this incident. This was a one-time issue for Aramark, compliance to the nonpolar FOG and all other limits have been achieved over the last several years except for this one time.</p> <p>Ecology took samples for several non-permitted (no effluent limits) parameters during this visit. The sampling is part of a research study Ecology is conducting. Results will be transmitted to Aramark separate from this inspection report since they are not compliance related.</p> <p>This report was authored by Maia Hoffman, P.E., Washington State Department of Ecology, NWRO pretreatment engineer, on 3/12/2021.</p>			