

	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
	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	<u>WA0029181 – West Point</u> <u>WA0029581 – South Plant</u> <u>WA0032247 – Brightwater</u> <u>WA0022527 – Vashon</u> <u>WA0032182 - Carnation</u>	Multiple days, see narrative	<u>G</u> <u>Pretreatment</u> <u>Audit</u>	<u>S</u>	<input checked="" type="checkbox"/> 1 Municipal

Remarks

Inspection work days 8.0	Facility Self-Monitoring N/A	Photos Taken <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Samples Taken <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	BI N	QA N
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Lead Ecology Inspector(s)

Maia Hoffman, Bolun Wang, Sean Wilson

Section B: Facility Data

Name, Location, and Phone of Facility Inspected King County Industrial Waste Program Wastewater Treatment Division 201 S. Jackson St., Seattle, WA 98104		Additional KCIW Staff Present/Interviewed Biniam Zelelow, Peggy Rice, Dana Heinz, Todd Gowing, Greg Newborn, Kristin Painter, Sharman Herrin, Bruce Tiffany
Name(s)/Title(s) of On-Site Representative(s) Mark Henley, Program Manager Arnaud Girard, Lead Investigator		
Name, Title, Phone, and Email of Responsible Official Mark Henley, Program Manager (206) 263-6994 mhenley@kingcounty.gov		
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 checked="" 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

The pretreatment compliance audit (audit) was conducted to evaluate King County's Industrial Waste (KCIW) Program compliance with state and federal requirements related to the implementation of the delegated industrial wastewater pretreatment program during the calendar years 2021 and 2022. King County owns and operates five municipal wastewater treatment plants (WWTP), as listed above in Section A. The Industrial Waste Program covers pretreatment requirements for all five WWTPs.

The Department of Ecology aims to conduct audits every 5 years. The last audit was conducted between 4/25/2018 and 5/10/2018.

Lead inspector, Maia Hoffman, announced the audit to Mark Henley via email on 8/6/2023 and included a lengthy document request. M. Hoffman reviewed most documents outside of the scheduled audit meeting times. The opening conference, main discussion of the program, and staff interviews occurred virtually, using Teams, on 10/12/2023 (8:30am-4:00pm). Industrial user site visits, described in later report sections, occurred on 10/16/23 (9:25am-11:20am), 10/17/23 (8:40am-12:00pm), and 10/18/23 (9:00am-12:25pm). A close out meeting occurred on 2/5/2024.

II. RESULTS AND DISCUSSION

An Audit 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 audit proceedings and any recommendations moving forward.

The audit consisted of a review of industrial user (IU) permit files (permit documents, inspection reports, self monitoring reports, compliance oversight monitoring reports, permit required reports, and enforcements), IU site visits, procedures manuals, enforcement response plan, legal authority, local limits development, and interjurisdictional agreements.

Annual pretreatment reports, document review, KCIW staff interviews, and IU site visits provided the necessary information to Ecology to conduct and write up the audit report.

KCIW annual pretreatment report:

KCIW submits one annual pretreatment report covering pretreatment activities at all POTWs, as required by the individual POTW NPDES permits. The annual report is due by 3/31 for activities covering the previous calendar year. KCIW submitted the report electronically via the WQWebPortal on 3/10/22 (for 2021) and 3/28/23 (for 2022). The annual reports are available through Ecology's Permitting and Reporting Information System (PARIS) by following the links below,

- 2021 report – <https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?Id=396991>
- 2022 report – <https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?Id=437647>

File review:

Prior to the audit, via email, M. Hoffman requested the following documents and information.

- Current POTW Legal Authority (Code and Public Rules/Regulations)
- Local Limits Development Records
- Intergovernmental Sewer Service Agreements with outside contributing jurisdictions.
- Program Resources Overview:
 - Titles of Pretreatment Personnel,
 - List of Duties (Pretreatment and non-Pretreatment) for each Pretreatment staff member,
 - Estimate of time and % FTEs for each duty identified above.
- Industrial User Inventory of the service area (most recent conducted),
 - Survey results for 66 high priority IUs identified in the 2015/2016 survey,
 - Permitting decisions for the 66 priority IUs.
- Pretreatment Permit Boilerplates or Templates
- Pretreatment Records of the listed facilities (see below).
 - Pretreatment permit and fact sheet
 - Associated control documents such as spill plans, slug discharge control plans, toxic organic management plans, Best Management Practices plans
 - Pretreatment records from January 2021-December 2022 including the following:
 - Self-monitoring compliance reports submitted by the SIUs
 - Inspection reports
 - Compliance evaluation of compliance reports and notices submitted by the SIUs, including significant non-compliance records
 - enforcement actions
 - correspondence
 - Other relevant Pretreatment records, not identified above
- List of industries or facilities that have Hauled Waste Agreements, including permit or DA numbers, receiving POTW, and description of industry type.
- Standard Operating Procedures, including:
 - Industrial User Inventory and Characterization Procedures
 - Permit Writing Procedures
 - Sampling Plan, Protocol or QAPP
 - Data Evaluation and SNC determination Procedures
 - Enforcement Response Plan

List of facilities to provide Pretreatment Records as identified above.

Marine Vacuum Service Inc, Rainier Commons LLC, Rabanco Recycling Co, Auto-Chlor Systems, ASKO Processing Inc., Magnetic and Penetrant Services Co, SPU Kent Highlands Landfill, Bellevue Eastgate Landfill, KCSWD Duvall Closed Landfill, Aero Controls Inc., Tri-Way Industries Inc, KCRSD Renton Decant Facility, Pacific Iron & Metal, Cintas Corporation, AGC Biologics, Seattle Genetics North Creek, Nucor Steel.

KCIW staff interviews:

On 10/12/23, conducted over Teams, M. Hoffman, B. Wang, and S. Wilson had the opening meeting and staff interviews with KCIW staff. M. Henley and A. Girard were present for the entirety of the meeting with other staff joining as necessary for certain topics or to discuss specific permits. During this meeting, we had discussion on the following topics,

- Major activities/updates of the KCIW pretreatment program in 2021 and 2022.
- Local limits evaluation review.
- Review of procedures manuals.
- Intergovernmental agreements.
- Permit review.
- Hauled waste agreements.

IU deep dive:

In addition to the discussions on the IUs (permits) listed above, M. Hoffman conducted a deeper dive into 10 IU control documents. The attached checklist includes information documents reviewed and what standards the information was assessed on. The permits reviewed in this deeper dive include Marine Vacuum Services, Rainier Commons LLC, Rabanco Recycling Co, Auto-Chlor Systems, ASKO Processing, Pacific Iron & Metal, AGC Biologics Inc., Aero Controls Inc, Tri-Way Industries, KCSWD-Duvall Closed Landfill. These specific industries were chosen based on enforcement information provided in the annual program reports, industry types of interest to Ecology, IU type, and in order to get a diverse selection of industries and control mechanisms.

Additionally, M. Hoffman conducted site visits along with KCIW staff at Marine Vacuum Services, Pacific Iron & Metal, and AGC Biologics. Site visit reports are attached in the checklist.

III. CONCLUSION

KCIW implements the largest pretreatment program in Washington State. Ecology commends the processes KCIW has put in place to track and permit all required SIUs and several hundred additional IUs (under discharge authorizations). King County has no major compliance deficiencies in implementing the pretreatment program. In doing document review and site visits, Ecology did identify a few minor deficiencies. The recommendations below note these deficiencies along with a few additional recommendations for continuous improvement.

1. Analytical methods (SIU self monitoring) *corrected by King County Industrial Waste in November 2023*
40 CFR 403.12(g)(5) requires all analyses to demonstrate continued compliance must be performed in accordance with procedures contained in 40 CFR Part 136. In addition, KCIW permits specify required test procedures as those procedures established in the CWA and contained in 40 CFR Part 136. During the Marine Vacuum Services Inc (Mar Vac) inspection, KCIW inspectors and Ecology inspectors reviewed self-monitoring analytical reports for organics. The lab Mar Vac contracts with to analyze the required organic pollutant parameters is using Method 8260D and Method 8270E. These methods are not 40 CFR Part 136 approved. KCIW must correct Mar Vac's self monitoring analysis. KCIW should review the sampling and analysis practices of other permits that require organics monitoring.

Biniam Zelelow, KCIW, followed up with Marine Vacuum staff via email in November 2023 about the analytical methods being used for compliance monitoring. KCIW provided technical assistance to the permittee in finding an accredited lab to run the required analyses. Email documentation from January 2024 confirms that Marine Vacuum switched labs to one accredited for the appropriate, required methods starting in November 2023. Therefore, the above noted deficiency (#1) has been adequately addressed and corrected by KCIW and Marine Vacuum.

2. Use of certification statements
KCIW conducted compliance monitoring at AGC Biologics Inc (AGC) in 2021. Acetone was detected above the effluent limit which is based on the pretreatment standards in 40 CFR Part 439 Subpart A. KCIW issued an NOV to AGC for the noncompliance. After investigation, AGC determined the cause of the acetone exceedance and put in place corrective actions. Additionally, the fact sheet to the current permit states that KCIW conducts semiannual monitoring for total toxic organics, including the regulated organics in 40 CFR 439 Subpart A, of which there were nine detections of acetone during the course of the last permit. During the audit document review, Ecology discovered that upon permit application, AGC was allowed to submit an organics certification statement certifying no organics were used or generated. This is despite KCIW's knowledge that acetone is present in the wastewater discharge and used in the manufacturing room for equipment testing. KCIW must reevaluate use of certification statements and what information is being certified to.
3. Identification of requirement to follow slug discharge control plan
KCIW documents in fact sheets which SIUs were determined to require a slug discharge control plan. Additionally, the permit identifies specific reporting timelines for slug or spill discharges and slug and spill BMPs. However, permits do

not specifically state the permittee must follow processes and procedures submitted in the slug discharge control plan. As an example, the ASKO Processing Inc discharge permit (No. 7728-06) fact sheet identifies that an updated Slug Plan was received by KCIW in 2019. However, neither the Spill and Slug Discharges notification requirements in condition S6.A or Spill and Slug Discharge Control Procedures in condition S8.B specifically require the submitted plan be followed. There is room for improvement in making the slug discharge control plan contents and following those a specific requirement of the permit instead of relying on the standard requirements and BMPs as currently listed.

4. KCIW oversight/compliance monitoring

As required by 40 CFR 403.8(f)(2)(v), KCIW does conduct at least annual monitoring of all SIUs. This frequency is maintained in the KCIW Procedures Manual. KCIW must use the same sampling and monitoring protocol as required in the SIU permit, including analytical methods. However, upon review of KCIW monitoring documentation provided as part of this audit, Ecology found the analytical methods used by KCIW to not be transparent. The field notes, chain of custody, or the data letters do not clearly state which analytical method was employed. KCEL is accredited for conducting a wide range of methods, some of which are not contained in 40 CFR 136. Ecology recommends KCIW modify data letters documenting results from KCEL to show which methods were used or provide some sort of crosswalk to improve transparency.

During the closing meeting, it was discussed that the analytical method is present in the KCIW database, however this information is not ultimately on the data letters. Opportunities exist to improve transparency and include the analytical method on data letters if possible.

5. Ecology noted that local limits have not be thoroughly reevaluated for West Point and South Plant since 2010 and Brightwater since 2017. In annual pretreatment reports, KCIW evaluates adequacy of local limits by looking at removal rates and influent and effluent concentrations. However, in the preceding 14 years, the Seattle metro area has changed significantly. KCIW would benefit from a more thorough local limits analysis using data gathered from permit monitoring requirements, specifically a review of the headworks analysis for the MAHL and MAIL. 40 CFR 122.44(j)(2)(ii) requires pretreatment programs to provide written technical evaluation of the need to revise local limits following permit issuance or reissuance.

Ecology is editing the draft permit renewal for West Point WWTP to include a local limits reevaluation. A previous permit did not include this requirement. KCIW should follow the requirements in the permit renewal, when issued, to address this deficiency. Ecology anticipates KCIW to wait to follow any future permit requirement for this effort.

To close out these identified deficiencies or opportunities for improvement, Ecology requests KCIW provide an update on any outstanding items in the next annual pretreatment report. Due to the short timeframe until the 2023 report is due, an update in the 2024 annual report (due in March 2025) is sufficient.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425) 507-5681	2/5/2024
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Shawn McKone 	WA Dept. of Ecology, NWRO, (206) 594-0000	2/6/2024

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.

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym/Abbreviation List

Section I Data Review

Section II IU File Evaluation

Section III Observations and Concerns

Attachment A Pretreatment Program Status Update

Attachment B Pretreatment Program Profile

Attachment C Legal Authority Review Checklist

Attachment D Worksheets

3 Site Visit Data Sheet

Control Authority (CA) name and address	Date(s) of audit
King County Wastewater Treatment Division - Industrial Waste Program (KCIW) 201 S Jackson St, Suite 5513 Seattle, WA 98104-3855	

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Documented on report cover sheet				

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address
Maia Hoffman	Pretreatment Engineer/Ecology	(425) 507-5681	mhof461@ecy.wa.gov

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
Mark Henley	Program Manager/KCIW *	(206) 263-6994	mhenley@kingcounty.gov

*Identified program contact

ACRONYM AND ABBREVIATION LIST

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

ACRONYM AND ABBREVIATION LIST (CONTINUED)

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

GENERAL INSTRUCTIONS

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

SECTION I: DATA REVIEW

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

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

<p>1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)? If yes, discuss.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;">x</td> </tr> </table>	Yes	No		x	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;">x</td> </tr> </table>	Yes	No		x
Yes	No									
	x									
Yes	No									
	x									
<p>b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)? If yes, describe.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;">x</td> </tr> </table>	Yes	No		x	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;"> </td> </tr> </table>	Yes	No		
Yes	No									
	x									
Yes	No									
<p>c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)? If yes, describe.</p> <p>KCIW updated the public rule implementing local limits</p> <ul style="list-style-type: none"> • In 2020, King County adopted PUT 8-13-2-PR. There were no major changes to the local limits. Ecology determined this rule update was a non-significant program modification. <p>KCIW removed the public rule implementing the ERP. Instead, KCIW is utilizing the King County code authorizing implementation of an ERP and has a stand alone ERP document. This change also occurred in 2020.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;">x</td> <td style="text-align: center;"> </td> </tr> </table>	Yes	No	x		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> <tr> <td style="text-align: center;"> </td> <td style="text-align: center;"> </td> </tr> </table>	Yes	No		
Yes	No									
x										
Yes	No									

SECTION I: DATA REVIEW (CONTINUED)

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

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

Not evaluated during this audit in 2023.

Documentation of previous evaluations can be found in the 2011 and 2016 audit reports.

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

Yes	No

If not, when?

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

Yes	No

If yes, check which ones.

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

Pretreatment Compliance Audit Checklist

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]		
2. a. Are there any planned changes to the POTW's treatment plant(s)? If yes, describe.	Yes	No
		x
b. Are these changes to the treatment plant(s) due to pretreatment issues? If yes, what were the issues?	Yes	No
		x
B. LEGAL AUTHORITY [403.8(f)(1)]		
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW? If yes, complete questions b–e. There are 34 contributing jurisdictions. The vast majority of these jurisdictions are within King County, however there are still sewer use contracts. An example contract for NE Sammamish Water and Sewer District was provided.	Yes	No
b. List the contributing jurisdictions. There are 3 main jurisdictions contributing wastewater outside of King County: a portion of Alderwood Water, a portion of north Pierce County, and the Muckleshoot Indian Tribe	x	
c. Does the control authority have agreements in place that address pretreatment program responsibilities? As stated above, there are agreements in place. However, the agreements rely on KC municipal code and do not list out specific pretreatment responsibilities.	Yes	No
d. Is the CA or the contributing jurisdiction responsible for the following:	x	
	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		
Notifying IUs of requirements		
Issuance of control mechanisms		
Receiving and reviewing IU reports		
Conducting inspections		
Conducting compliance monitoring		
Enforcement of Pretreatment Standards and Requirements		

SECTION I: DATA REVIEW (CONTINUED)

B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)		
<p>e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?</p> <p>If yes, explain.</p>	Yes	No
		x
<p>2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes? Not evaluated, see information in 2011 and 2016 audit reports.</p> <p>b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?</p> <p>c. Did the CA update its procedures and ERP to implement the changes in its SUO?</p> <p>Explain</p> <p>Interlocal agreements include a statement that industrial wastewaters delivered by the [jurisdiction] and accepted by the County are "subject to such reasonable, nondiscriminatory rules and regulations as may be adopted from time to time by the King County Council."</p>	Yes	No
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>	Yes	No
		x

SECTION I: DATA REVIEW (CONTINUED)

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

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

KCIW defines SIU in KCC 28.82.800. KCIW uses (also incorporated into 28.82.800) the provision to determine that if an IU that otherwise meets the definition of an SIU is found to have no reasonable potential for adversely affecting the POTW's operation or violating pretreatment standards, then the IU is not an SIU.

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

KCIW uses the MTCIU designation. KCC 28.82.515 defines middle tier categorical industrial user as a categorical industrial user for which the control authority has reduced monitoring requirements because the control authority has determined that the user meets the requirements in Section 403.12(e)(3) of the Act.

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

KCIW uses the NSCIU designation. KCC 28.82.565 defines nonsignificant categorical industrial user as a categorical industrial user that the control authority has determined meets the requirements of 40 CFR Sec. 403.3(v)(2) of the Act.

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

See answer below.

Discuss any problems.

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

KCIW conducts routine surveys based on information from contributing jurisdictions, drive bys, and other referrals. Typically every 5 years, KCIW conducts a comprehensive survey throughout the entire service area, including in contributing jurisdictions.

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

Permitted/controlled IUs are required to notify KCIW of changes in the wastewater discharge as a condition of the control mechanism. Otherwise, KCIW identifies changes during routine or comprehensive surveys.

SECTION I: DATA REVIEW (CONTINUED)

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

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

Evaluated from KCIW's 2022 annual pretreatment report.

a.	102	SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
	49	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
	1	Middle-tier CIUs** (specify below)
	52	Noncategorical SIUs
b.	535	Other regulated nonsignificant IUs (specify) (including Major DAs, Minor DAs, and LAs)
	516	Noncategorical nonsignificant IUs
	1	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
	18	Zero-discharging CIUs** (specify below)
c.	637	TOTAL

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

List of NSCIUs and zero-discharging CIUs:
 NSCIU: Aero Controls Inc - 20th Street (Minor DA 834-03)

All zero discharge CIUs are listed in Appendix A Part 2 of the 2022 annual pretreatment report.

List of Middle-Tier CIUs:
 Tri-Way Industries Inc. - Auburn (permit 7746-06)

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

MTCIU classifications are based on flow volume dependent on receiving treatment plant. Information on MTCIU classifications are documented in Chapter 2 of the Procedures Manual. The max flow volume for MTCIU is 5,000 gpd for West Point and South Plant, 2,520 gpd for Brightwater, and up to 26 gpd to Vashon and 21 gpd to Carnation. As shown above, KCIW applies MTCIU classification to only one industrial user which discharges to South Plant.

List of SIUs with general control mechanisms:
 No SIUs are permitted with general control mechanisms.

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]		
1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	<input type="text" value="0"/>	%
b. Has the CA implemented any general control mechanisms? <i>KCIW uses discharge authorizations (major and minor) and letters of authorization for non-SIUs.</i>		
c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism:	<input type="text" value="0"/>	
d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	<input type="text" value="0"/>	
If any, explain.		
2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?		<input type="text" value="Yes"/>
b. How are control mechanisms (specifically limits) developed for these facilities? <i>Not specifically evaluated during this audit.</i> Discuss		
	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	<input checked="" type="checkbox"/>	
b. Is any of the waste hazardous as defined by RCRA?		<input checked="" type="checkbox"/>
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		<input checked="" type="checkbox"/>
d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)] <i>All hauled waste customers are issued some sort of non-permit control mechanism (letters of authorization, general permit, or major discharge authorizations). Hauled waste is predominantly discharged at South Plant's septage receiving station, with the exception of Duvall Landfill (closed) which hauls to Brightwater.</i>		

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

No hauled waste from a CIU. Local limits apply to hauled waste.

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

Internal workgroups assigned to various aspects of continuous improvement/oversight of program.

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

Local limit development is identified in KCC 28.84.060. Adopted local limits are in KC public rule PUT 18-13-2-PR, updated in November 2020.

a. For what pollutants have local limits been set?

pH (corrosive substances), total metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, silver, zinc), cyanide, FOG (non-polar and polar), settleable solids, hydrogen sulfide, organic compounds that result in presence of toxic gases, vapors, or fumes or in quantities that may cause acute worker safety problems, flammable materials (based on explosion hazard meter reading thresholds).

b. How were these pollutants selected?

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

Sludge disposal requirements are typically the criteria with the most stringent MAHLs.

d. Which allocation method(s) were used?

KCIW developed uniform concentration limits that are in public rule. However, KCIW also has parallel loading limits outlined in the Procedures Manual and a memo posted on the KCIW website.

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

There are separate limits for SIUs and IUs > 5,000 gpd which outlines both daily average and instantaneous limits, while there are only daily average for all other IUs.

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

Local limits were developed in 1990 and received approval from Ecology on 10/30/1990. A reevaluation of local limits was conducted in 2010 to prepare to bring Brightwater online. It was determined during the 2010 reevaluation that local limits were protective. Ecology approved this eval. on 3/30/2011.

Brightwater limits were again evaluated when the POTW was brought online in 2017.

Yes	No
x	

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

If yes, how has this been addressed?

Organics and PCBs are pollutants of concern. KCIW established screening levels for many organics. There are screening levels developed for PCBs if considered a pollutant of concern at an IU. If there are issues with meeting the screening limit, KCIW develops PCB limits that are protective of the sludge use of the receiving POTW.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

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

Not evaluated during this audit.

F. COMPLIANCE MONITORING

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

KCIW maintains procedures for determining IU self monitoring frequency, KCIW oversight monitoring, and inspection frequency in their Procedures Manual chapters 2-4.

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

Explain any difference.

The Procedures Manual often includes the minimum requirements as well as recommendations. The minimum requirements are always met. In most cases, the recommendations for the various monitoring and inspection frequencies are met.

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

Yes. Due to number of SIUs permitted, it is not practical to review all permits to determine which ones KCIW performs monitoring for the IU.

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

(Define the 12-month period 1/1/22 to 12/31/22.)

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

0	%
---	---

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

0	%
---	---

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

0	%
---	---

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

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

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

SNC Evaluation Period 1/1/22-12/31/22*

6/6	100	%	Applicable Pretreatment Standards and reporting requirements (5/6 discharge violations, 1/6 reporting violation) *SNC defined by:					
		%	Self-monitoring requirements	<table border="1" style="border-collapse: collapse;"> <tr> <td style="padding: 2px;">POTW</td> <td align="center" style="padding: 2px;">x</td> </tr> <tr> <td style="padding: 2px;">EPA</td> <td></td> </tr> </table>	POTW	x	EPA	
POTW	x							
EPA								
		%	Pretreatment compliance schedule(s)					

*SNC publication in Spring for previous year. Reviewed Spring 2023 SNC posting on KCIW's website.

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs. KC CHRL has been in SNC for many years for discharges of arsenic above local limits in the permit. Enforcement and compliance orders have been issued to resolve the problem.

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

Evaluation Period: 1/1/21-12/31/21

Number of SIUs: 37

Names of SIUs: SIUs in 100% compliance (during 2021) listed in 2022 annual pretreatment report.

KCIW issues awards recognizing SIUs for commitment to compliance. Gold awards are issued to SIUs who have been in continued, consistent compliance for an entire calendar year (no violations).

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

Basic inspection includes reviewing/updating basic site information and contacts, overview of operations, major changes, inspection of process and production areas, spill prevention, slug discharge plan review, pretreatment system, chemical storage areas, dangerous wastes, self monitoring requirements.

Request a copy of the CA's inspection form, if applicable.

A blank form was not requested. However, KCIW provided completed inspection reports, using their standardized form, for several IUs for the past two years.

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

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
KCEL
KCEL
KCEL/contract lab

KCEL conducts the majority of the compliance monitoring analysis for KCIW. KCEL will contract with an outside lab for a few parameters, mostly associated with pharmaceutical standards.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

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

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	x	Sample Splits	x
Chain-of-custody forms	x	Sample Blanks	x
New Sampling Tubes		Sample Spikes	
Field Blanks	x	Other:	
Other:			

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

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA?
[403.12(j)&(p)]

Yes	No

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?
[Requirement for notification included as standard permit condition.](#)

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

[Included in annual inspection reports and during permit renewal.](#)

List SIUs required to have a slug discharge control plan:
[Not practical to list all SIUs required to have slug discharge plan.](#)

Yes	No

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

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

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

SNC is defined in KCC 28.82.810.

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

a. Has the ERP been adopted by the POTW?

Yes

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

The ERP was approved by Ecology in 1994. KCIW made minor modifications to the ERP in 2020, Ecology determined this was not a substantial modification.

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

Yes, outlined in Ch 3 of the ERP.

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

Yes, outlined in Ch 5 of the ERP.

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

Yes, outlined in Ch 6 of the ERP.

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

Yes

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

Yes, the ERP is effective at addressing noncompliance .

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

Yes	No
x	
x	

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

KCIW issues compliance orders, which include schedules for attaining compliance through completion of specific tasks.

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)				
<p>4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]</p> <p>If yes, attach a copy. KCIW includes a copy of the notices published in the annual pretreatment report available on PARIS and posted on website.</p> <p>If no, explain.</p>	Yes		No	
	x			
<p>5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?</p>			0/6	
<p>b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?</p>			0/6	
<p>6. a. Did the CA experience any of the following caused by industrial discharges?</p> <ul style="list-style-type: none"> • Interference • Pass through • Fire or explosions (flashpoint, and such) • Corrosive structural damage • Flow obstruction • Excessive flow rates • Excessive pollutant concentrations • Heat problems • Interference due to oil and grease (O&G) • Toxic fumes • Illicit dumping of hauled wastes • Worker health and safety • Other (specify) 	Yes	No	Unknown	Explain
		x		
		x		
		x		
		x		
		x		
		x		
		x		
		x		
		x		
		x		
		x		

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)		
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I] Not applicable	Yes	No
7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA? b. If yes, how many were due to nondomestic waste issues (O&G blockages)? Not evaluated during this audit.	Yes	No
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
1. How is confidential information handled by the CA? [403.14] Information management procedures are outlined in Ch 11 of the Procedures Manual, including management of confidential information.		
2. How are requests by the public to review files handled?		

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

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

No. KCIW is in the process of updating their electronic management system and may accept electronic reporting in the future.

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

The current data management system is custom made to fit the needs of KCIW's program. However, it is written in an out dated language and there is limited support. KCIW is in the process of converting the database to a modern language for continued operation, use, and support.

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

Not evaluated during this audit.

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

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

Not evaluated. At a minimum, 3 years, as required by Ecology NPDES permits.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)]			
1. Estimate the number of personnel (in FTEs) available for implementing the program. In addition to the FTEs identified below by activity, KCIW also has one program manager and two engineers. KCIW provided an overview of work responsibilities as applied to the different title in the organization (administrators, engineers, compliance specialists, and compliance investigators)			
Activity	FTEs	Activity	FTEs
Legal Assistance		Sample Analysis	
Permitting & Inspections	9	Data Analysis: Review and Response	
Inspections		Enforcement	
Sample Collection	3	Administration	1.5
(Dedicated to only pretreatment) Total Number of FTEs			16.5
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)		Yes	No
If not, explain.		x	
3. a. Estimate the annual operating budget for the CA's program. Operating budget was not reviewed during this audit.			\$
b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)? Discuss any changes in funding. At the time of the initial audit meetings, KCIW was anticipating hiring, and had job postings, for an administrative position, compliance investigator positions, and project manager for special projects.			
4. Discuss any problems in program implementation that appear to be related to inadequate resources. No deficiencies noted.			

SECTION I: DATA REVIEW (CONTINUED)

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

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?
 KCIW recently instituted workgroups for enforcement, permit writing, and procedures manual. Workgroups are responsible for discussion and updating related work to address emerging concerns and changing regulations.

Yes	No
X	

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

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

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

	Influent	Effluent	Sludge	Ambient (Receiving Water)
• Metals	4x	4x	4x	Not evaluated
• Priority pollutants	2x	2x	2x	"
• Biomonitoring	Not evaluated	Not evaluated		"
• Toxicity Characteristic Leachate Procedure (TCLP)	"	"		"
• Extraction Procedure (EP) toxicity	"	"		"
• Other (specify)				

Less	Equal	More
		X

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

Explain any differences.

During the West Point site visit, King County staff mentioned that influent and effluent sampling were conducted more frequently than required in the permit. However, KCIW annual reports only use paired sampling data from quarterly intensive sampling.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)		
<p>c. Is the CA reporting these results to the Approval Authority?</p> <p>If yes, at what frequency?</p> <p>KCIW reports a summary of results in the annual pretreatment report. Additionally, King County is submitting sampling results electronically to Ecology through the electronic DMR system.</p>	Yes	No
	X	
<p>2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:</p> <ul style="list-style-type: none"> • Improvements in POTW operations • Loadings to and from the POTW • NPDES permit compliance • Sludge quality? • Sludge disposal options? <p>b. Has the CA documented these findings?</p> <p>Explain. (Attach a copy of the documentation, if appropriate.)</p> <p>KCIW explains conditions at the treatment plants in the annual reports. Compliance with NPDES permit limits, complying with water quality criteria and biosolids criteria is the measure of success.</p>	Yes	No
		X
	X	
	X	
	X	
	X	
<p>3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)</p> <p>KCIW track trends in removal efficiency, as required in the NPDES permit.</p> <p>Discuss on a pollutant-by-pollutant basis.</p> <p>KCIW provides a summary of influent, effluent, and biosolids monitoring in the annual pretreatment reports. No specific trends over time are evaluated. This may be a focus of a future audit or PCI.</p>		

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)		
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	Yes	No
	x	
<p>King County is starting to investigate loadings of contaminants of emerging concern to the POTWs.</p> <p>If yes, what was found?</p>		
5. a. Has the CA implemented any kind of public education program?	Yes	No
	x	
b. Are there any plans to initiate such a program to educate users about pollution prevention?	Yes	No
	x	
<p>Explain.</p> <p>KCIW publishes newsletters geared towards nondomestic users that includes technical assistance, regulatory and program updates, enforcement activities, and recognition of compliance successes. Additionally, KCIW has a website with many resources, including required forms and other relevant information for nondomestic users.</p>		
6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?		
7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?	Yes	No
		x
<p>Explain.</p> <p>Not specifically evaluated during this audit. May be a focus of a future audit or PCI.</p>		

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION I COMPLETED

BY: Maia Hoffman

TITLE: Pretreatment Engineer/Ecology

DATE: Completed 12/12/2023

TELEPHONE: (425) 507-5681

SECTION II: IU FILE EVALUATION

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

IU IDENTIFICATION

FILE <u>1</u> Industry name and address Permit No. 7676-08 5/28/2021-5/27/2026 Marine Vacuum Services Inc. 1516 S. Graham St, Seattle, WA	Type of industry Centralized waste treatment, marine sewage treatment, and non-CW ⁷ wastewaters SIC Code: 4499 NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>437</u> , _____, _____ Category(ies) <u>CW multiple wastestreams (B+C)</u>	Average total flow (gpd) 144,000 gpd	Average process flow (categorical) 38,400 gpd
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Comments

See attached industrial user site visit report.
 Additional documentation at IU site was reviewed during the visit.

Docs reviewed: permit, fact sheet, annual inspection reports (1/2021, 8/2022, 4/2023), additional inspection documented proceedings, KCIW CA monitoring + field notes (2022), enforcements, SNIKS (selection from 2021 + 2022), annual reports

FILE <u>2</u> Industry name and address Permit No. 7927-02 10/1/2021-9/30/2026 Rainier Commons LLC 3100 Airport Way S, Seattle, WA	Type of industry contaminated site cleanup (contaminated SW to sewer) SIC Code: NAICS Code: 531120	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow 135,000 gpd
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Comments

KCIW developed screening levels to characterize PCB contamination in stormwater and process wastewaters. The permit renewed included monitoring to determine PCB levels and evaluate conformance with screening levels. KCIW is in process of modifying the permit to include PCB effluent limits. due to frequent exceedance of screening levels.

Docs reviewed: 2021 application, permit, fact sheet, semiannual SNIKS (2021 + 2022), annual inspection reports (2021 + 2022)

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u>3</u> Industry name and address Permit No. 7595-07 12/7/2020-12/6/2025 Rabarco Recycling Co. 2733 3rd Ave S, Seattle, WA	Type of industry Solid waste transfer facility SIC Code: 5093 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd) 254,400 gpd	Average process flow
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments Docs reviewed: 2020 application, permit, fact sheet, SMEs (selection from 2021-2022), KCIW CA monitoring results (2021-2022), enforcements, slug discharge control plan, annual inspection reports (2021-2022)		
FILE <u>4</u> Industry name and address Permit No 7956-01 10/13/2020-10/12/2025 Auto-Chlor System 4315 7th Ave S, Seattle, WA	Type of industry Liquid detergent manufacturing SIC Code: 2841, 2842 NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>417</u> , _____, _____ Subpart P Category(ies) <u>manufacture of liquid detergents</u>	Average total flow (gpd)	Average process flow 2,500 gpd
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments In 2020, KCIW reevaluated this permittee as a categorical IU. Prior to this time, Auto-Chlor was controlled by a major discharge authorization. KCIW issued an NOV to Auto-Chlor for bypassing and discharging/overflowing process wastewater to storm drains. Auto-Chlor did not properly report this incident or similar, previous incidents. Docs reviewed: permit, fact sheet, annual inspection reports (2021, 2022, 2023), quarterly SMEs (2021-2022), enforcements.		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u>5</u> Industry name and address Permit No 7728-06 2/10/2020-2/9/2025 ASKO Processing Inc. 434 N 35 th St, Seattle, WA	Type of industry metal finishing job shop SIC Code: <u>3471</u> NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>413</u> , <u>433</u> , _____ Category(ies) _____	Average total flow (gpd)	Average process flow <u>3413 - 44,000 gpd</u> <u>3433 - 6,000 gpd</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments Docs reviewed: permit, fact sheet, T10 plan, annual inspection reports (2021-2022), KCIW CA monitoring data, slug discharge control plan, enforcements.		
General Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	Reg. Cite
File	File	File	File	File		
1	2	3	4	5	IU FILE REVIEW	
					A. ISSUANCE OF IU CONTROL MECHANISM	
ND	✓	✓	ND	ND	1. Control mechanism application form	
✓	✓	✓	✓	✓	2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
✓	✓	✓	✓	✓	a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					4. Control mechanism contents	403.8(f)(1)(iii)(B)
✓	✓	✓	✓	✓	a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
✓	✓	✓	✓	✓	b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
✓	✓	✓	✓	✓	c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Identification of pollutants to be monitored 	
					<ul style="list-style-type: none"> • Process for seeking a waiver for pollutant not present or expected to be present (CIUs only) 	
					<ul style="list-style-type: none"> • Is the monitoring waiver certification language included in the control mechanism? (Y/N) 	403.12(e)(2)(v)
					<ul style="list-style-type: none"> • Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N) 	403.12(e)(2)(vi)
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Sampling frequency 	
					<ul style="list-style-type: none"> - Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N) 	
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Sampling locations/discharge points 	
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Sample types (grab or composite) 	
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Reporting requirements (including all monitoring results) 	
✓	✓	✓	✓	✓	<ul style="list-style-type: none"> • Record-keeping requirements 	
<p>Comments</p>						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
✓	✓	✓	✓	✓	e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
✓	✓	✓	✓	✓	g. Notice of slug loadings	403.12(f)
✓	✓	✓	✓	✓	h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
✓	✓	✓	✓	✓	i. Notification of significant change in discharge	403.12(j)
✓	✓	✓	✓	✓	j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
✓	✓	✓	✓	✓	k. 24-hour notification of violation/resample requirement	403.12(g)(2)
✓	✓	✓	✓	✓	l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
NA	NA	NA	NA	NA	5. Issuance of General Control Mechanisms a. Involve the same or similar operations b. Discharge the same types of wastes c. Require the same effluent limitations d. Written request by the IU for coverage by a general control mechanism including: • Contact information • Production processes • Types of waste generated • Location for monitoring all wastes covered by the general permit • Any requests for a monitoring waiver for a pollutant neither present nor expected to be present e. Documentation to support the POTW's determination	403.8(f)(1)(iii)(A)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
✓	✓	✓	✓	✓	1. IU categorization	403.8(f)(1)(ii)
✓	NA	NA	✓		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	
NA			NA		d. Classification as an NSCIU	403.3(v)(2)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
✓	✓	✓	✓	✓	3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
✓	✓	✓	✓	✓	4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	NA	NA	NA	NA	5. Calculation and application of production-based standards	403.6(c)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)						
✓	NA	✓	✓	✓	6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
NA	NA	NA	NA	NA	7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
NA	NA	NA	NA	NA	8. Calculation and application of CWF or FWA	403.6(d)&(e)
✓	NA	NA	✓	✓	9. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
✓	✓	✓	✓	✓	1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA	NA	NA	NA	NA	a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
✓	✓	✓	✓	✓	2. Inspection at frequency specified in approved program	403.8(c)
✓	✓	✓	✓	✓	3. Documentation of inspection activities	403.8(f)(2)(v)
✓	✓	✓	✓	✓	4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
✓	ND	✓	✓	✓	5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
					• Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
✓	ND	✓	✓	✓	6. Sampling at the frequency specified in approved program	403.8(c)
✓				ND	7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
✓		✓	✓	✓	8. Analysis for all regulated parameters	403.12(g)(1)
ND	ND	ND	ND	ND	9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
✓	ND	✓	✓	✓	1. Identification of violations	403.8(f)(2)(vii)
✓			✓		a. Discharge violations	
✓				✓	• IU self-monitoring	
✓		✓	✓		• CA compliance monitoring	
	ND	✓			b. Monitoring/reporting violations	
					• IU self-monitoring	
					– Reporting (e.g., frequency, content)	
					– Sampling (e.g., frequency, pollutants)	
					– Record-keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
			✓		• Slug discharge control plan	
		✓			• Compliance schedule/reports	
	NA	NA			c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
✓	ND	✓	NA	NA	2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
✓	ND	✓	✓	✓	3. Response to violation	
✓	ND	✓	✓	✓	4. Adherence to approved ERP	
	ND	ND		✓	5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
✓	ND	✓	✓	NA	6. Escalation of enforcement	403.8(f)(5)(ii)
✓	ND	✓	NA	NA	7. Publication for SNC	403.8(f)(2)(viii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
✓			✓	✓	1. Self-monitoring and reporting	
✓	✓	✓	✓	✓	a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓	✓	✓	✓	✓	b. Analysis of all required pollutants	403.12(g)(1)&(h)
✓	ND	ND	ND	ND	c. Appropriate analytical methods (40 CFR Part 136)	
ND	ND	ND	ND	ND	d. Appropriate sample collection methods	
ND	ND	ND	ND	ND	e. Compliance with sample collection holding times	
ND	ND	NA	ND	ND	f. Submission of BMR/90-day report	403.12(b) &(d)
✓	✓	✓	✓	✓	g. Periodic self monitoring reports	403.12(e)&(h)
✓	✓	✓	✓	✓	h. Reporting all required pollutants	403.12(g)(1)&(h)
✓	✓	✓	✓	✓	i. Signatory/certification of reports	403.12(l)
NA	NA	NA	NA	NA	j. Annual certification by NSCIUs	403.12(q)
ND	NA	NA	NA	NA	k. Submission of compliance schedule reports by required dates	403.12(c)
X	ND	ND	X	✓	l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
				✓	• Discharge violation	
					• Slug load	
					• Accidental spill	
ND	✓	✓	ND	ND	m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
	NA	NA	NA	NA	n. Notification of hazardous waste discharge	403.12(j)&(p)
		✓	ND	✓	o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
NA	ND	NA	NA	NA	p. Notification of significant changes	403.12(j)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File <u>4</u>	File <u>5</u>	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
NA	NA	NA	NA	NA	2. Compliance with all general control mechanism requirements	403.12(e)(3)
NA	NA	NA	NA	NA	3. If the CA has classified the discharger as a middle-tier CIU <ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller) • Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW • Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant 	
NA	NA	NA	NA	NA	4. If the CA has granted the discharger a monitoring waiver <ul style="list-style-type: none"> • Certification statements with each compliance report 	403.12(e)(2)
ND	NA	NA	ND	ND	5. Compliance with BMR requirements, if applicable (Y/N)	403.3(v)(2)
NA	NA	NA	NA	NA	6. If the CA has classified the discharger as an NSCIU <ul style="list-style-type: none"> • IU discharges less than 100 gpd of total categorical wastewater • Annual certification statements from the IU 	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>		
					E. IU COMPLIANCE STATUS (continued)	
NA	NA	NA	NA	✓	7. If the CA has established equivalent mass limits for a CIU <ul style="list-style-type: none"> • IU is effectively operating treatment technologies to achieve compliance • IU is recording the facility's flow rates • IU is recording the facility's production rates • IU has notified the CA whenever production rates vary • IU continues to employ water conservation methods/technologies 	403.6(c)(5)(ii)
Comments						

SECTION II: IU FILE EVALUATION

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

IU IDENTIFICATION

FILE <u>6</u> Industry name and address Pacific Iron & Metal Co. permit: 7577-06 (6/16/19-6/15/24) 2230 4th Ave S., Seattle, WA 98134	Type of industry Scrap metal processing SIC Code: 5093 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR <u>403</u> , _____, _____ Category(ies) <u>non-categorical</u>	Average total flow (gpd) permitted max daily discharge volume - 60,000 gpd	Average process flow -
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments site visit report included in this audit report. Docs reviewed: 2019 application, permit, fact sheet, selection of SUEs 2021+2022, slug discharge control plan, annual inspection report (2021+2022), engineering report, enforcements, KCIW oversight monitoring		
FILE <u>7</u> Industry name and address Permit No 7918-02 9/25/2019-9/24/2024 ABC Biologics Inc. 2210 220th St SE, Bothell, WA	Type of industry biopharmaceutical manufacturing SIC Code: NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>439</u> , _____, _____ Subpart A Category(ies) <u>Fermentation</u>	Average total flow (gpd)	Average process flow 42,000 gpd
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments site visit report included in this audit report Docs reviewed: permit, fact sheet, pollutant certifications, inspections (2021+2022), selection of SUEs 2021+2022, enforcements, slug discharge control plan, KCIW monitoring		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u>8</u> Industry name and address Discharge authorization No <u>834-03</u> 9/21/2021 - 9/20/2026 Aero Controls Inc. - 20th St 1610 20th St NW, Auburn, WA	Type of industry <u>metal finishing</u> SIC Code: <u>3728</u> NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow <u>100 gpd</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input checked="" type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments <u>Issued a minor discharge authorization, categorized as NSCIU.</u> <u>Docs reviewed: 2021 application, control document, NSCIU annual certifications, T70 certifications, inspection report (2021), monitoring data (2021)</u>		
FILE <u>9</u> Industry name and address Permit No <u>7746-06</u> 1/18/2021 - 1/17/2026 Tri-Way Industries Inc 506 44th St NW, Auburn, WA	Type of industry <u>metal furniture/fixture manufacturing</u> SIC Code: <u>2899</u> NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow <u>1,440 gpd</u>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU <u>[X] MTCU</u>	Industry visited during audit Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments <u>Docs reviewed: 2020 application, permit, fact sheet, T70 certifications, semi annual SNRS (2021-2022), annual inspection reports (2021-2022), KLUW monitoring 2022</u>		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u>10</u> Industry name and address Discharge Authorization 4400-02 12/28/2021-12/27/2026 KCSWD - Duvall Closed Landfill 22905 WE Old Woodinville - Duvall Rd Woodinville, WA	Type of industry closed landfill SIC Code: 4953 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow 60,000 gpd
<input type="checkbox"/> Other SIU <input checked="" type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments KCIW maintains authority to categorize IUs >25,000 gpd as non-SIUs if the wastewater characterization shows low impact (i.e. domestic-like). Docs reviewed: 2021 application, control document, semi-annual SMCs (2021-2022)		
General Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	Reg. Cite
File	File	File	File	File		
Pacific Iron & Metal Co.	AGC Biologics	Aero Controls	Tri-Way	KCSWD Drall		
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	IU FILE REVIEW	
					A. ISSUANCE OF IU CONTROL MECHANISM	
✓	ND	NA	✓	✓	1. Control mechanism application form	
✓	✓	NA	✓	NA	2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
✓	✓	✓	✓	✓	a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
✓					4. Control mechanism contents	403.8(f)(1)(iii)(B)
✓	✓	✓	✓	✓	a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
✓	✓		✓		b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
✓	✓	✓	✓	✓	c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
<p>Comments</p> <p>File 8 is a minor DA and does not follow or require same conditions as a permit</p> <p>File 10 is a major DA and does not follow or require same conditions as a permit.</p>						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
✓	✓	✓	✓	✓	d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓	✓	✓	✓	✓	• Identification of pollutants to be monitored	
	✓		✓		• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
	Y		Y		• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
	Y		Y		• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
✓	✓	✓	✓	✓	• Sampling frequency	
	Y				- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
✓	✓	✓	✓		• Sampling locations/discharge points	
✓	✓	✓	✓	✓	• Sample types (grab or composite)	
✓	✓	✓	✓	✓	• Reporting requirements (including all monitoring results)	
✓	✓	✓	✓		• Record-keeping requirements	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>6</u>	File <u>7</u>	File <u>8</u>	File <u>9</u>	File <u>10</u>	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
✓	✓		✓		e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
✓	✓		✓		g. Notice of slug loadings	403.12(f)
✓	✓		✓	✓	h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
✓	✓		✓		i. Notification of significant change in discharge	403.12(j)
✓	✓		✓		j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
✓	✓		✓	✓	k. 24-hour notification of violation/resample requirement	403.12(g)(2)
✓	✓		✓		l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>		
N/A	NA	NA	NA	NA	5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
					e. Documentation to support the POTW's determination	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>6</u>	File <u>7</u>	File <u>8</u>	File <u>9</u>	File <u>10</u>	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
✓	✓	✓	✓	NA	1. IU categorization	403.8(f)(1)(ii)
NA	✓	✓	✓	NA	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	
	NA	✓	NA		d. Classification as an NSCIU	403.3(v)(2)
	NA	X			e. Documentation for the qualification to be classified as NSCIU	
	X				f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
✓	✓	✓	✓	NA	3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
✓	✓	✓	✓	✓	4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	NA	NA	NA	NA	5. Calculation and application of production-based standards	403.6(c)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
✓	✓	✓	✓	NA	6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
NA	NA	NA	NA	NA	7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
NA	NA	NA	NA	NA	8. Calculation and application of CWF or FWA	403.6(d)&(e)
✓	✓	✓	✓	NA	9. Application of most stringent limit	403.8(f)(1)(ii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	C. CA COMPLIANCE MONITORING	
✓	✓		✓	NA	1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
		✓			a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
		✓			• Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
			✓		• Inspect at least once every 2 years	
✓	✓	✓	✓	ND	2. Inspection at frequency specified in approved program	403.8(c)
✓	✓	✓	✓	✓	3. Documentation of inspection activities	403.8(f)(2)(v)
✓	✓		✓		4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
✓	✓		✓		5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
	✓				a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
	✓				• Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
			✓		• Sample and analyze IU discharge at least once every 2 years	
✓	✓	✓	✓	✓	6. Sampling at the frequency specified in approved program	403.8(c)
ND	ND	✓	✓		7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
✓	✓	✓	✓		8. Analysis for all regulated parameters	403.12(g)(1)
ND	ND	ND	ND		9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
<p>Comments</p> <p>File 8 kciw samples discharge every 5 years</p> <p>File 10 kciw did not document site visit in report but retained pictures</p>						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>10</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	D. CA ENFORCEMENT ACTIVITIES	
✓	✓	NA	NA	NA	1. Identification of violations	403.8(f)(2)(vii)
✓	✓				a. Discharge violations	
✓					• IU self-monitoring	
✓	✓				• CA compliance monitoring	
✓					b. Monitoring/reporting violations	
✓					• IU self-monitoring	
✓					– Reporting (e.g., frequency, content)	
✓					– Sampling (e.g., frequency, pollutants)	
✓					– Record-keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
✓					• Slug discharge control plan	
✓					• Compliance schedule/reports	
					c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>6</u>	File <u>7</u>	File <u>8</u>	File <u>9</u>	File <u>10</u>	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
NA	NA	NA	NA	NA	2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
✓	✓	NA	NA	NA	3. Response to violation	
✓	✓	NA	NA	NA	4. Adherence to approved ERP	403.8(f)(5)
		NA	NA	NA	5. Return to compliance	
					a. Within 90 days	
	✓				b. Within time specified	
					c. Through compliance schedule	
✓	✓	NA	NA	NA	6. Escalation of enforcement	403.8(f)(5)(ii)
NA	NA	NA	NA	NA	7. Publication for SNC	403.8(f)(2)(viii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>6</u>	File <u>7</u>	File <u>8</u>	File <u>9</u>	File <u>10</u>	IU FILE REVIEW	Reg. Cite
E. IU COMPLIANCE STATUS						
✓	✓	ND	✓	✓	1. Self-monitoring and reporting	
✓	✓		✓	✓	a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓	✓		✓	✓	b. Analysis of all required pollutants	403.12(g)(1)&(h)
✓	ND		ND		c. Appropriate analytical methods (40 CFR Part 136)	
✓	✓		ND		d. Appropriate sample collection methods	
	ND		ND		e. Compliance with sample collection holding times	
	ND		ND		f. Submission of BMR/90-day report	403.12(b) &(d)
✓	✓		✓	✓	g. Periodic self monitoring reports	403.12(e)&(h)
✓	✓		✓	✓	h. Reporting all required pollutants	403.12(g)(1)&(h)
✓	✓		✓	✓	i. Signatory/certification of reports	403.12(l)
					j. Annual certification by NSCIUs	403.12(q)
					k. Submission of compliance schedule reports by required dates	403.12(c)
					l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
✓	✓				m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
	NA				n. Notification of hazardous waste discharge	403.12(j)&(p)
	✓				o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
	NA				p. Notification of significant changes	403.12(j)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>6</u>	File <u>7</u>	File <u>8</u>	File <u>9</u>	File <u>10</u>	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
✓	✓	✓	✓	✓	2. Compliance with all general control mechanism requirements	
NA	NA	NA	✓		3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
			✓		<ul style="list-style-type: none"> Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller) 	
			✓		<ul style="list-style-type: none"> Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW 	
			✓		<ul style="list-style-type: none"> Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant 	
NA					4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
	✓	✓	✓		<ul style="list-style-type: none"> Certification statements with each compliance report 	
ND	ND	ND	MD	NA	5. Compliance with BMR requirements, if applicable (Y/N)	
NA	NA	✓	NA	NA	6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
		✓			<ul style="list-style-type: none"> IU discharges less than 100 gpd of total categorical wastewater 	
		✓			<ul style="list-style-type: none"> Annual certification statements from the IU 	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>		E. IU COMPLIANCE STATUS (continued)
NA	NA	NA	NA	NA	7. If the CA has established equivalent mass limits for a CIU <ul style="list-style-type: none"> • IU is effectively operating treatment technologies to achieve compliance • IU is recording the facility's flow rates • IU is recording the facility's production rates • IU has notified the CA whenever production rates vary • IU continues to employ water conservation methods/technologies 	403.6(c)(5)(ii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
60						
Comments						
SECTION II COMPLETED BY: <i>Maia Hoffman</i>						DATE: <i>12/26/23</i>
TITLE: <i>Pretreatment Engineer/Ecology</i>						TELEPHONE: <i>425 507 5681</i>

SECTION III: OBSERVATIONS AND CONCERNS

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

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications No issues or concerns identified. 	403.18	I.A.1
<ul style="list-style-type: none"> • Modification to the program to accommodate the 2005 General Pretreatment Regulation changes Not evaluated during King County audits anymore, see previous audit reports. 	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements No issues or concerns identified. See legal authority review checklist. 	403.8(f)(1)	I.B.2&3
<ul style="list-style-type: none"> • Adequate multijurisdictional agreements <p>No major compliance deficiencies identified. Agreements in place with all contributing jurisdictions. Agreements give King County broad legal authority and require contributing jurisdictions to follow all pretreatment rules and regulations in KCC. Contributing jurisdictions may or may not have relevant information in their sewer use ordinances. No specific roles and responsibilities are identified in the agreements. To date, there have been no instances of issues arising from the current agreements in place.</p>	403.8(f)(1)	I.B.1&3

Prior to 2019, KCIW permitted SIUs and maintained pretreatment authority in a portion of the Edmonds POTW service area. Wastewater flow in this specific area is part of a flow swap agreement, and therefore often times is accepted by King County POTWs. However, King County did not have an agreement with Edmonds. Negotiations were started, but ultimately, Ecology maintained authority in this area. Due to flow swapping, it is possible that Edmonds would receive wastewater from this area in question and Edmonds does not have an approved program, therefore Ecology must permit SIUs. Ecology may reevaluate in the future authority changes as appropriate.

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

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

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards <p>No issues or concerns identified.</p>	403.8(f)(1)(ii)&(iii) 403.5	II.B
<ul style="list-style-type: none"> Basis and adequacy of local limits <p>KC POTWs have not experienced pass through or interference. Local limits appear to be protective in this sense. KCIW evaluates local limits in annual reports by calculating the mean removal efficiency and tracking over time. However, this approach alone does not evaluate increased loadings over time or compare to MAILs governing local limit allocation. Local limits for all POTWs were last evaluated in 2010, with an update for Brightwater in 2017. Ecology recommends more frequent local limit evaluation at a minimum through calculating MAHLs and MAILs, or providing more detail as to why local limit reevaluation is not necessary.</p>	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency <p>No issues or concerns identified.</p>	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> Adequate inspections <p>No issues or concerns identified.</p>	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> Adequate sampling protocols and analysis <p>The analytical methods used by KCEL for CA compliance monitoring are not transparent.</p>	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
<ul style="list-style-type: none"> Adequate IU self-monitoring <p>Observations,</p> <ol style="list-style-type: none"> Failure of IU to use Part 136 methods for compliance monitoring (Marine Vacuum). Failure to require IU to start monitoring when waived pollutant found present and above limit (AGC Biologics). 	403.8(f)(2)(iv)	I.F.6,G.5; II.E
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges <p>No issues or concerns identified.</p>	403.12(j)&(p)	I.F.8; II.D.1.b
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans <p>No issues or concerns identified.</p>	403.8(f)(2)(vi)	I.F.9; II.C.4
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) <p>No issues or concerns identified.</p>	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of <i>significant noncompliance</i> definition <p>No issues or concerns identified.</p>	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
<ul style="list-style-type: none"> Develop and implement an ERP <p>No issues or concerns identified.</p>	403.8(f)(5)	I.G.2; II.D.3
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC <p>No issues or concerns identified.</p>	403.8(f)(2)(viii)	I.G.4; II.D.7

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
<ul style="list-style-type: none"> Effective enforcement <p>No issues or concerns identified.</p>	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation <p>No issues or concerns identified.</p>	403.5(c)(3); 403.12(o); 403.14	I.H
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources <p>No issues or concerns identified. During the audit, KCIW discussed additional staff being hired in the upcoming year.</p>	403.8(f)(3)	I.I

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources No issues or concerns identified. 		I.J.1&3
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness Not evaluated. 		I.J.2
<ul style="list-style-type: none"> Integration of pollution prevention No issues or concerns identified. KCIW does not appear to have a formal approach to pollution prevention beyond the requirements of the pretreatment program requirements. However, on specific issues, KCIW does respond to unusual incidents, participates in Duwamish and East Waterway workgroups, and is starting up internal workgroups to improve permitting and oversight. 		I.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		
SECTION II COMPLETED BY: Maia Hoffman	DATE: 12/27/23	
TITLE: Pretreatment Engineer/Ecology	TELEPHONE: 4255075681	

ATTACHMENT C: LEGAL REVIEW CHECKLIST

CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: King County
 DATE OF REVIEW: 10/5/23

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

NONE = No revision necessary REQ = Require Revision REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A	x			28.82.020	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C	x			28.82.050	
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E	x			28.82.060	
4. Categorical Pretreatment Standard or Categorical Standard	403.6	§ 1.4 F	x			28.82.100	
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M	x			28.82.350	
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL	x			28.82.370	
7. Interference	403.3(k)	§ 1.4 O	x			28.82.430	
8. National Pretreatment Standard, Pretreatment Standard, or Standard	403.3(l)	§ 1.4 BB	x			28.82.520	
9. New Source	403.3(m)	§ 1.4 T	x			28.82.540	
10. Pass Through	403.3(p)	§ 1.4 V	x			28.82.580	
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA	x			28.82.640	
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD	x			28.82.700	
13. Significant Industrial User <i>[NOTE: §1.4 GG(3) is an optional streamlining provision for Nonsignificant Categorical Industrial User classification.]</i>	403.3(v)	§ 1.4 GG	x			28.82.800	
14. Significant Noncompliance	403.8(f)(2)(vii)	§ 9 (A-H)	x			28.82.810	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH	x			28.82.830	
16. Other definitions based on terms used in the POTW Ordinance			x				
King County code includes many additional definitions as listed in 28.82.010-28.82.1000.							
B. National Pretreatment Standards – Prohibited Discharges							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A	x			28.84.060(D)(4)	
b. Pass Through	403.5(a)	§ 2.1A	x				same reference as above
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60 °C or 140 °F flashpoint)	403.5(b)(1)	§ 2.1B(1)	x			28.84.060(D)(5) a	
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)	x			d	
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)	x			b	
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)	x			e	
e. Heat; exceeds 40 °C (104 °F)	403.5(b)(5)	§ 2.1B(5)	x			f	
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)	x				incorporated in local limits
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)	x			c	
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)	x			i	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2	x			28.84.060(E)	
4. Local Limits Development <i>[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]</i>	403.5(c) & (d)	§ 2.4	x			28.84.060 (F)	
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6	x			28.82.215	
6. Best Management Practices Development <i>[NOTE: Optional streamlining provision.]</i>	403.5(c)(4)	§ 2.4C	x			28.84.060 (F)(1)	
C. Control Discharges to POTW System							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2	x			28.84.060 (J)(1)(b)	
2. Individual Control Mechanism (e.g., permit) to ensure compliance - <i>Permit Content</i>	403.8(f)(1)(iii)	§ 4.2	x			28.84.060 (J)	
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)	x			28.84.060 (J)(5)(i)	
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§5.2A(2)	x			28.84.060(J)(10)	
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)	x			28.84.060 (D)(2)	

NONE = No revision necessary

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
d. Best Management Practices <i>[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§ 2.4 C).]</i>	403.8(f)(1)(B)(3)	§ 5.2A(3)	x			28.84.060 (E)	incorporated by reference to categorical standards 40 CFR Chapter I, Subchapter N, Parts 405-471
e. Self-Monitoring Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	x			28.84.060 (K)(3)	
f. Reporting & Notification Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)					
g. Record-Keeping Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)	x				
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4) & 403.12(e)(2)	§ 5.2A(5)					
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B)(5)	§ 5.2A(6)					
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. Where the POTW has determined that slug controls are necessary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)	x			28.84.060 (L)(12)	

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
k. Specific Waived Pollutant <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4)	§ 5.2A(8)					
l. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					
m. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					
n. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					
o. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					
p. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					
q. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>							
3. General Control Mechanism to Ensure Compliance <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated the use of General Permits (§ 4.6 of the Model SUO).]</i> - Permit Content	403.8(f)(1)(iii)(A)	§ 4.2 & 4.6	x			28.84.060 (J)(1)	authorizes use of GPs as a control mechanism, same references as stated above for individual mechanisms
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)					
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§ 5.2A(2)					

NONE = No revision necessary

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REC = Recommend Revision

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

NONE = No revision necessary

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. The ordinance should indicate that a user is required to develop a slug discharge control plan if determined by the POTW to be necessary.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)					
k. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					
l. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					
m. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					
n. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					
o. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					
p. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>							
D. Required Reports							
1. Develop Compliance Schedule for Installation of Technology	403.8(f)(1)(iv)	§§ 5.2b(2) & 10.4	x			28.84.060(l)	

NONE = No revision necessary

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

*Federal reporting requirements for IUs incorporated through reference in 28.84.060(K)(5)

NONE = No revision necessary

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
f. Notification of Changes Affecting Potential for a Slug Discharge <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(vi)	§ § 6.5 & 6.6					
g. Notice of Violation/Sampling Requirement <i>[NOTE: Required streamlining revision.]</i>	403.12(g)(2)	§ 6.8					
h. Requirement to Conduct Representative Sampling	403.12(g)(3)	§ 6.4E					
i. Notification of Changed Discharge	403.12(j)	§ 6.5					
j. Notification of Discharge of Hazardous Waste	403.12(p)	§ 6.9					
<i>Other Reporting Requirements</i>							
k. Data Accuracy Certification & Authorized Signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14					
l. Record-Keeping Requirement (3 years or longer)	403.12(o)	§ 6.13	x			28.84.060(K)(12)	
- Including documentation associated with Best Management Practices <i>[NOTE: Required streamlining provision.]</i>	403.12(o)	§ 6.13					
m. Submission of All Monitoring Data <i>[NOTE: Required streamlining revision]</i>	403.12(g)(6)	§ 6.4F				28.84.060(K)(4)	
n. Annual Certification by Nonsignificant Categorical Industrial Users <i>[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]</i>	403.3(v)(2)	§§ 4.7C & 6.14B					

NONE = No revision necessary

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
o. Certification of Pollutant Not Present <i>[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]</i>	403.12(e)(2)(v)	§ 6.14C					
E. Test Procedures [40 CFR Part 136 & 403.12(g)]							
1. Analytical Procedures (40 CFR Part 136) <i>[NOTE: Required streamlining provisions]</i>	403.12(g)	§ 6.10	x			28.84.060(K)(4)	
2. Sample Collection Procedures <i>[NOTE: Required streamlining provisions]</i>	403.12(g)(3) & (4)	§ 6.11					
F. Inspection and Monitoring Procedures [403.8(f)]							
1. Right to Enter All Parts of the Facility at Reasonable Times	403.8(f)(1)(v)	§ 7.1	x			28.84.060(L)	
2. Right to Inspect Generally for Compliance	403.8(f)(1)(v)	§ 7.1	x				
3. Right to Take Independent Samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1	x			28.84.060(L)	
4. Right to Require Installation of Monitoring Equipment	403.8(f)(1)(iv)	§ 7.1	x			28.84.060(K)	
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1					
G. Remedies for Noncompliance (Enforcement) [403.8(f)(1)(vi)]							
1. Non-Emergency Response							
a. Injunctive Relief	403.8(f)(1)(vi)	§ 11.1					
b. Civil/criminal Penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3	x			28.84.060(O)(2)(d) 28.84.060(O)(2)(j)	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
2. Emergency Response							
a. Immediately Halt Actual/Threatened Discharged	403.8(f)(1)(vi)(B)	§ 10.7	x			28.84.060(O)(2)(g)	
3. Legal Authority to Enforce Enforcement Response Plan							
	403.8(f)(1)(vi)	§ 11.4	x			28.84.060(O)(2)	
H. Public Participation							
1. Publish List of Industrial Users in Significant Noncompliance <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(viii)	§ 9					
2. Access to Data [403.8(f)(1)(vii) & 403.14]							
a. Government	403.14(a) & (c)	§ 8					
b. Public	403.14(b)	§ 8					
I. Optional Provisions							
1. Net/Gross Adjustments <i>[streamlining provision]</i>	403.15	§ 2.2 D					
2. Equivalent Mass Limits for Concentration Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 E					
3. Equivalent Concentration Limits for Mass Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 F					
4. Upset Notification	403.16	§ 13.1					
5. Waive Monitoring for Pollutant Not Present or Expected to be Present <i>[streamlining provision]</i>	403.12(e)(2)	§ 6.4B					
6. Reduce Periodic Compliance Reporting <i>[streamlining provision]</i>	403.12(e)(3)	§ 6.4C					
7. Other Special Agreement or Waivers (Excluding Wavier of National Categorical Pretreatment Standards and Requirements)							

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
8. Hauled Waste Reporting/Requirements		§ 3.4					
9. Grease Interceptor Reporting/Requirements		§ 3.2 C					
10. Authority to Issue Notice of Violations (NOVs)		§ 10.1	x			28.84.060 (O)	
11. Authority to Issue Administrative Orders (AOs)			x			28.84.060 (O)	
12. Authority to Issue Administrative Penalties		§ 10.6	x			28.84.060(O)	
13. Authority to Enforce Against Falsification or Tampering							
14. Any Other Supplemental Enforcement Actions as Noted in the POTW's Enforcement Response Plan							
15. Permit Appeals Procedures							
16. Penalty or Enforcement Appeals Procedures							
17. Bypass Notification	403.17	§ 13.3					

*28.84.060(5) generally references pretreatment standards and requirements of Sections 307(b) and 307(c) of the Act.

Document(s) submitted for review:
King County Code - Title 28 (available online)

Name of Reviewers
Maia Hoffman

ATTACHMENT D: SITE VISIT DATA SHEET (3)

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.								
Name of industry: Pacific Iron and Metal Co. (Pac Iron)								
Address of industry: 2230 4th Avenue S, Seattle, WA 98134								
Date of visit: 10/16/2023			Time of visit: 9:25am-11:20am					
Name of inspector(s): Maia Hoffman (Ecology), Bolun Wang (Ecology) Peggy Rice (KCIW), Mark Henley (KCIW)								
Provide the name(s) and title(s) of industry representative(s)								
Name		Title		Phone/E-mail				
Shawn Altermott		VP Operations (Pac Iron)						
Myron LaFrance, Ryan Higginson		Facility Manager, Wastewater Treatment Manager (Pac Iron)						
Derek Heitz		Consultant (Maul, Foster, Alongi)						
IU Permit Number: 7577-06		Exp Date: 6/15/2024		IU Classification: SIU (non categorical)				
Inspection Type/Purpose	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA		
		PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint		
Please provide the following documentation:								
1. Nature of operation: Scrap metal processing for sale to domestic and international markets. Pac Iron receives and processes copper, brass, aluminum, stainless steel, iron, and lead.								
2. Number of employees		Number of shifts:		Hours of operation:				
3. Water source:								
4. Wastestream flow(s) discharged to the POTW: The main wastewater stream that discharges to the sanitary sewer is stormwater that comes into contact with the scrap metal recycling operations.								
Sanitary:		(gpd)	Process:	60,000	(gpd)	Combined:		(gpd)
5. Describe any significant changes in process or flow: The pretreatment system was upgraded in early 2023.								
6. Type of pretreatment system (Describe): Equalization vault, clarifier (dosed with flocculant, HaloKlear LiquiFloc 1%), settling tank, sand filter, and granular activated carbon filter.								
<input checked="" type="checkbox"/>	Continuous flow (when raining)		<input type="checkbox"/>	Batch		<input type="checkbox"/>	Combined	
7. Condition/operation of pretreatment system (Describe): The treatment system is only operational when there is stormwater. As of the last year, new catch basin filters are being used to capture particulates prior to entering the treatment system.								
Any unusual conditions or problems with the pretreatment system:								

SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used):</p> <p style="color: blue;">During the site visit, we toured the outside storage and processing areas which contributed contaminated stormwater to the pretreatment system. Incoming materials are generally processed in open air, covered warehouses. However, there is exposure to materials in process and staged outdoors.</p>			
<p>9. Condition/operation of process area (Describe):</p>			
<p>Any unusual conditions or problems with the process area:</p>			
<p>10. General housekeeping in process area (Describe):</p> <p style="color: blue;">Site staff stated that every Friday the operations are shut down and there is thorough sweeping and cleaning of the grounds. Daily sweeps occur as well. Staff also indicated that the ground is swept prior to and after staging materials to ensure there is not a significant build up exposed to stormwater.</p>			
<p>Any unusual conditions or problems with general housekeeping in process area:</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):</p> <p style="color: blue;">Pretreatment system flocculant is stored inside a shed next to the system.</p>			
Any floor drains?	No	Any spill control measures?	
<p>General housekeeping of chemical storage area (Describe):</p>			
<p>12. Are hazardous wastes drummed and labeled?</p>			
<p>13. Does the IU have hazardous waste manifests?</p>			
<p>Any problems associated with hazardous waste:</p>			

SITE VISIT DATA SHEET (Continued)

<p>14. Solid waste production: Solid waste is produced during semiannual clean outs of the pretreatment system tanks.</p>					
<p>Solid waste disposal method(s):</p>					
<p>15. Description of sample location: Site staff and KCIW take representative compliance samples from the manhole after the treatment process.</p>					
<p>Sampling method/technique: <u>Grab and composite</u></p>					
16. Evaluation of self-monitoring data:		x	Yes	No	N/A
<p>If yes, was self-monitoring adequate: <u>Yes, self monitoring was completed per the permit.</u></p>					
<p>17. Who performs the self-monitoring analysis? <u>Myron and Ryan are the responsible Pac Iron staff who collect compliance samples.</u></p>					
Notes:					
<p>The following documents were reviewed during the site visit,</p> <ul style="list-style-type: none"> • Slug discharge control plan • Components of the O&M Manual • Analytical reports and COCs for February, April, and May 2023 monthly SMRs • Calibration records for flow meter • Records of the vault and clarifier clean outs • Records of the aluminum/coolant collection vault wastewater hauling <p>Site staff mentioned that some of the BMP activities and pretreatment system maintenance activities are not documented. However, there does appear to be some discrepancy in the narrative of the pretreatment system O&M activities provided during the inspection and what was documented in the approved O&M Manual (May 2023). Examples include the frequency of the inline turbidimeter calibration and completion/documentation of recurring maintenance activities. There was also some question as to what maintenance activities Pac Iron staff conducted versus Clear Water Services (treatment system designer/consultant).</p> <p>The effluent flow meter only records the flow through the pretreatment system. The equalization vault is equipped with an overflow pipe to divert excess wastewater directly to the sewer. If an overflow event is occurring, the system will alarm to notify operators but the flow meter will not capture this excess flow.</p> <p>An additional sanitary sewer discharge point was identified. Pac Iron acquired the parcel just to the north of the main facility. There is a discharge to sanitary of primarily stormwater. The discharge line is equipped with an oil water separator. KCIW indicated this new discharge point will be added to the permit during the upcoming permit renewal.</p>					

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of industry: Marine Vacuum Services, Inc.						
Address of industry: 1516 S. Graham St, Seattle, WA 98108						
Date of visit: 10/17/2023				Time of visit: 8:40am-12:00pm		
Name of inspector(s): Maia Hoffman, Bolun Wang (Department of Ecology) Biniam Zelelow, Mark Henley, Arnaud Girard (KCIW)						
Provide the name(s) and title(s) of industry representative(s)						
Name		Title			Phone/E-mail	
Fred Shirmer, Tom Myler		Owners				
Robin Shirmer		General Manager				
Eric Carter		Chemist				
IU Permit Number: 7676-08		Exp Date: 5/27/2026		IU Classification: CIU		
Inspection	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
Type/Purpose		PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint
Please provide the following documentation:						
1. Nature of operation: Collects, transports, treats, and disposes of non-regulated (non-haz) wastes. Mar Vac is a Centralized Waste Treatment facility that provides treatment and recovery of oily wastes and organic bearing wastes received from off-site businesses and agencies.						
2. Number of employees	36	Number of shifts:		Hours of operation:	24/7	
3. Water source:						
4. Wastestream flow(s) discharged to the POTW: The permit authorizes discharge from 3 outfalls. Regulated wastewaters include the wastestreams from the CWT treatment process, non-CWT wastewaters, and marine sewage.						
Sanitary:		(gpd)	Process:		(gpd)	Combined: (gpd)
5. Describe any significant changes in process or flow:						
6. Type of pretreatment system (Describe): Marine sewage is treated with bleach to control soluble sulfides. Non-CWT wastes are treated with a sedimentation tank followed by sand filtration to reduce solids						
<input type="checkbox"/> Continuous flow		<input type="checkbox"/> Batch			<input type="checkbox"/> Combined	
Type of pretreatment (continued): CWT wastes are treated by equalization, gravity separation (oil/water separation), pH neutralization, chemical precipitation, sand filtration, and GAC filtration (carbon adsorption). Treatment is primarily for removal of oil, metals, and organics.						
7. Condition/operation of pretreatment system (Describe): The CWT treatment system was the only system in operation during the site visit, it was in good condition.						

SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used): The entire site is the process area. Stormwater from all areas of the site drains to the CWT treatment system. Bulk oil and used oil tanks are within containment. Mar Vac has vector trucks staged at the site which would be able to respond to a spill on site if it would impact treatment. The facility reclaims used oil from oily wastewaters for reuse. Vector trucks and other types of tanks are coming into the site to dispose of approved liquid wastes very frequently. Tanks are washed on site. The facility solidifies sludges brought on site and from the treatment system with carpet prior to landfilling.</p>			
<p>9. Condition/operation of process area (Describe): The site was as expected. The marine sewage and non-CWT disposal sites were locked since not in use.</p>			
<p>Any unusual conditions or problems with the process area:</p>			
<p>10. General housekeeping in process area (Describe): This site is generally not a clean site due to the operations that occur. However, there appeared to be order to the operations and staging.</p>			
<p>Any unusual conditions or problems with general housekeeping in process area:</p>			
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):</p>			
Any floor drains?		Any spill control measures?	
<p>General housekeeping of chemical storage area (Describe):</p>			
<p>12. Are hazardous wastes drummed and labeled? XQG (no regulated waste generated)</p>			
<p>13. Does the IU have hazardous waste manifests?</p>			
<p>Any problems associated with hazardous waste:</p>			

SITE VISIT DATA SHEET (Continued)

14. Solid waste production: Significant amount of non-regulated solidified sludges disposed of from the site.							
Solid waste disposal method(s): Transport to landfill.							
15. Description of sample location: Treated wastewater is sampled after the carbon filters for compliance monitoring or from the final effluent tank prior to discharge.							
Sampling method/technique: Conducted as required in permit							
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: Correct frequency of self monitoring Questions on lab accreditation of on site lab and the method used by contract lab for organics analysis							
17. Who performs the self-monitoring analysis? Mar Vac lab conducts metals, HEM, pH. OnSite Environmental (contract) conducts organics.							
Notes:							
<p>At the beginning of the site visit, we spent a considerable amount of time reviewing the waste acceptance procedures employed at Mar Vac to ensure only approved wastes are processed. Mar Vac has a well defined waste acceptance procedure and maintains appropriate documentation of approved wastes as well as rereview criteria. Mar Vac documents approved wastes on a waste profile sheet and requires bills of lading for incoming wastes (BOL only for external companies using the disposal site). All wastes must be approved prior to being accepted on site. Customers can get a blanket approval for recurring wastestreams.</p> <p>We toured the operations, spending the majority of the time reviewing the CWT wastewater offload area and treatment system. We briefly viewed the non-CWT and marine sewage treatment tanks and sampling sites.</p> <p>Mar Vac's lab accreditation for HEM, pH, and metals expired 10/5/23, they are working to regain the accreditation. In the meantime, at the site visit, Mar Vac said they had started sending sample results for all parameters to OnSite. Inspectors asked to review the analytical process, however most of the calculations are done by hand and we could not follow the process.</p> <p>Mar Vac is using OnSite for organics analysis (VOA and SVOAs). OnSite is accredited for Method 8260D for VOA and Method 8270E for SVOA. Both of these methods are intended for the analysis of solid and chemical materials matrix, but can be used for water matrices. However, these methods are not Part 136/CWA approved methods. The permittee is required to use Part 136 approved methods for the analysis of samples used for compliance monitoring. It is unclear from KCIW procedures whether different methods can be used to evaluate for screening level only parameters.</p> <p>Mar Vac appeared to be a well operated site conducting an important service for industrial, cleanup, and emergency response sectors.</p>							

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of industry: AGC Biologics Inc.						
Address of industry: 2210 220th St SE, Bothell, WA 98021						
Date of visit: 10/18/2023				Time of visit: 9:00am-12:25pm		
Name of inspector(s): Maia Hoffman, Bolun Wang (Ecology) Dana Heinz, Mark Henley (KCIW)						
Provide the name(s) and title(s) of industry representative(s)						
Name		Title			Phone/E-mail	
Charlotte Mesecar		EHS Specialist				
Steve (Facilities Manager) , Phil (Engineering Manager) , Dave (Director, Global EHS)						
IU Permit Number: 7812-02		Exp Date: 9/24/2024		IU Classification: CIU		
Inspection	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input checked="" type="checkbox"/>	PCA
Type/Purpose		PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>	Complaint
Please provide the following documentation:						
1. Nature of operation: Contract process development and manufacturer of biopharmaceuticals for commercial and clinical trial use.						
2. Number of employees		Number of shifts:		Hours of operation:		
3. Water source:						
4. Wastestream flow(s) discharged to the POTW: Wastewater is predominantly generated from equipment cleaning processes. However, wastewater, in smaller volumes is always generated from excess and spent processing solutions.						
Sanitary:		(gpd)	Process:		(gpd)	Combined: (gpd)
5. Describe any significant changes in process or flow:						
6. Type of pretreatment system (Describe): The only pretreatment is pH neutralization.						
Continuous flow		Batch			Combined	
7. Condition/operation of pretreatment system (Describe): The pretreatment system was in good operating condition.						
Any unusual conditions or problems with the pretreatment system: The treatment system operator conducted a process control pH probe calibration during the tour. The calibration check failed (outside the tolerance limit set in procedures). AGC staff said the probe would be recalibrated or replaced.						

SITE VISIT DATA SHEET (Continued)

<p>8. Process area description (identify raw materials and processes used):</p>				
<p>9. Condition/operation of process area (Describe): The process area toured during the visit was very clean and organized.</p>				
<p>Any unusual conditions or problems with the process area:</p>				
<p>10. General housekeeping in process area (Describe):</p>				
<p>Any unusual conditions or problems with general housekeeping in process area:</p>				
<p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): We toured the hazardous waste storage room which is managed by Ingenium. The facility is a MQG with some episodic events.</p>				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; padding: 2px;">Any floor drains?</td> <td style="width: 25%;"></td> <td style="width: 25%; padding: 2px;">Any spill control measures?</td> <td style="width: 25%;"></td> </tr> </table>	Any floor drains?		Any spill control measures?	
Any floor drains?		Any spill control measures?		
<p>General housekeeping of chemical storage area (Describe):</p>				
<p>12. Are hazardous wastes drummed and labeled?</p>				
<p>13. Does the IU have hazardous waste manifests?</p>				
<p>Any problems associated with hazardous waste:</p>				

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:						
Solid waste disposal method(s):						
15. Description of sample location: Treated wastewater is sampled after the pH neutralization system from a sample port on the discharge line or from the air gap water flow to the sewer.						
Sampling method/technique: <u>Continuous pH monitoring</u>						
16. Evaluation of self-monitoring data:		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	N/A
If yes, was self-monitoring adequate:						
17. Who performs the self-monitoring analysis?						
Notes:						
<p>This site is regulated as a CIU under 40 CFR 439 Subpart A (pharmaceutical fermentation).</p> <p>We reviewed self monitoring report data for December 2022, January 2023, and February 2023. The site only collects daily flow and pH. There was a question as to why the flow for the last day of the month is consistently low, appears to be a trend. Staff did not immediately know why the flow would be lower on the final day.</p> <p>Facility personnel described the reorientation and reconfiguration of the piping on the outlet site of the treatment system, including relocating the discharge flow meter. Appropriate information was sent to KCIW regarding this change.</p> <p>During an October 2021 KCIW compliance sampling event at AGC, acetone was detected above the effluent limit value. KCIW issued an NOV to AGC. AGC reviewed all processes and operations at the site and determined acetone was used in testing of one component of the equipment. The discharge line from this was disconnected from the sewer and is now captured as hazardous waste. AGC previously certified that no organics were used or generated at the facility. Ecology pointed out the discrepancy in the certification statement language and the fact that acetone is used. KCIW will reissue the permit within the next year and will review use of and/or update the certification statement language accordingly.</p>						