



**PIERCE COUNTY**  
**PLANNING AND PUBLIC WORKS**  
**SEWER DIVISION**  
**INDUSTRIAL PRETREATMENT PROGRAM**

**2024 ANNUAL REPORT**

February 26, 2025

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# 1. COVER SHEET

NPDES Permit Holder or Sewer Authority Name: Pierce County Planning and Public Works

Report Date: February 26, 2025

Period Covered by this report: From 1/01/2024 to 12/31/2024

Name of Wastewater Treatment Plant

State Permit Number

Chambers Creek Regional WWTP  
Cascadia Wastewater Treatment System

WA 0039624  
ST 6215

Person to contact concerning information contained in this report:

Name: River Wan

Title: Laboratory Supervisor

Mailing Address: 10311 Chambers Creek Rd. W.

University Place, WA 98467-1040

Telephone No.: (253) 798-3002

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



February 26, 2025

Laurie Pierce, Wastewater Operations Manager

## 2. EXECUTIVE SUMMARY

This annual report addresses the Pretreatment Report requirement outlined below:

- Section S6.A.5 of the NPDES Permit WA00039624, issued to the Chambers Creek Regional Wastewater Treatment Plant (CCRWWTP)
- Section S7 A of the NPDES Permit ST6215 issued to the Cascadia Wastewater Treatment System (Cascadia), which allows the pretreatment report to be included within the CCRWWTP's annual pretreatment report.

As an Ecology-delegated program, the Pierce County industrial pretreatment program ensures compliance with federal, state, and local regulations for all industrial users discharging to CCRWWTP. We achieve this through comprehensive activities including:

- Pretreatment reviews: Assessing potential impacts of industrial discharges.
- Permit issuance: Establishing authorized discharge limits for each industrial user.
- Inspections: Verifying compliance with permit conditions and program regulations.
- Sampling and testing: Analyzing industrial wastewater to monitor pollutant levels.
- Enforcement actions: Addressing non-compliance issues to protect CCRWWTP and the environment.

This report details PCIPP's activities and accomplishments throughout the past year, demonstrating our commitment to effective pretreatment and environmental protection.

Cascadia's performance remained strong in 2024. The wastewater treatment plant receives discharge from only a few minor industrial users (MIUs), with no significant industrial users (SIUs) or categorical industrial users (CIUs) posing a risk to plant operations. Nevertheless, the industrial pretreatment program maintained diligent oversight of industrial activities through established policies and procedures. Anticipating future growth in the sewer service area, we are prepared to apply the same robust control mechanisms to any new industrial users.

Chambers Creek Regional Wastewater Treatment Plant (CCRWWTP) maintained impeccable performance in 2024. No operational disruptions stemmed from industrial wastewater, and the plant achieved perfect compliance for its discharges into Puget Sound. Moreover, whole effluent toxicity testing revealed no adverse effects on aquatic life.

Monitoring of priority pollutants revealed consistently positive results for Puget Sound discharges. All were either non-detected or well below water quality criteria.

The Chambers Creek Regional Wastewater Treatment Plant (CCRWWTP) continues to excel in transforming biosolids into valuable resources. Their flagship product, SoundGro fertilizer, consistently meets the "exceptional quality" (EQ) criteria set by the U.S. Environmental Protection Agency (EPA). They also produce Class B biosolids that meet the EPA's land application criteria.

Most significant industrial users and categorical industrial users (SIUs/CIUs) with issued industrial wastewater discharge permits (IWDP) have demonstrated a high degree of compliance with pretreatment local limits and categorical discharge limits.

### **A. Interference in the Collection System**

While the treatment plant operated without significant issues, the collection system has historically suffered from corrosion and odor issues, primarily due to high sulfate levels from industrial discharge.

In 2023, the County implemented a novel approach by allowing LRI to nitrify ammonia to nitrate. This effectively treated microbially induced corrosion and odor. However, this solution has limitations. Nitrate addition is beneficial only during the warm season when wastewater temperatures favor hydrogen sulfide formation. In colder months, the biological process slows, hydrogen sulfide is no longer a problem, and nitrate addition becomes unnecessary. This excess nitrate then reaches the plant, increasing Total Inorganic Nitrogen (TIN) levels. Because the plant operates under the Puget Sound Nutrient General Permit, which mandates TIN levels below 10 mg/L, this winter nitrate increase could jeopardize compliance. During a recent process upset at LRI, an emergency discharge of up to 110,000 gallons per day revealed that nitrate levels could increase by as much as 2 mg/L.

LRI's long-term goal is denitrification to reduce nitrate loading. However, since biological nutrient removal cannot be easily started and stopped seasonally, year-round operation will likely be required. This eliminates the benefit of seasonal nitrate addition and shifts focus to addressing the high sulfate levels from James Hardie.

James Hardie recently demonstrated a successful sulfate treatment technology capable of reducing sulfate to manageable levels at one of their other sites, and has requested additional discharge capacity for their James Hardie 2 facility. Approval of this capacity increase will be conditional upon the installation of a similar sulfate treatment system. This will mitigate sulfate loading, thereby reducing corrosion and odor issues in the collection system associated with their discharge.

## B. Emerging Pollutants of Concern

Pierce County's pretreatment program proactively addresses emerging pollutants of concern.

- **PFAS:** Prior to current NPDES permit requirements, the County began monitoring PFAS in the plant's influent, effluent, and biosolids. Effluent and biosolids monitoring will continue. The County has also evaluated treatment technologies for landfill leachate (a known high-PFAS source) in partnership with a technology provider. This evaluation, focused on best available technologies (BATs) effective in drinking water treatment, provided valuable insights into the advantages and limitations of each BAT, informing future decision-making regarding industrial PFAS management.
- **6PPDq:** While 6PPDq does not impact wastewater, it affects stormwater, which is regulated under both the Industrial Stormwater General Permit (ISGP) and the Municipal Separate Stormwater Sewer System (MS4) permit. Some industries covered by the ISGP are already required to monitor 6PPDq, and benchmarks may be added to future ISGPs. The pretreatment program, funded by the Department of Ecology through an Interagency Agreement (IAA), conducted a study on 6PPDq removal using the County's Decant Facility (a permitted industrial user).

## 3. PRETREATMENT PROGRAM SUMMARY

The PCIPP program was established in 1988 as a Washington State Department of Ecology delegated pretreatment program, which is codified in Pierce County Pretreatment Ordinance 13.06. Pierce County owns and operates the Chambers Creek Regional Wastewater Treatment Plant (CCRWWTP) which provides sanitary sewer service to unincorporated areas, Cities, and Towns within Pierce County in its sanitary sewer service area:

Pierce County entered interlocal agreements with the following cities, towns, and districts

- City of Dupont
- City of Edgewood
- City of Fife
- City of Milton
- City of Lakewood
- City of Tacoma
- City of University Place
- Lakehaven Utility District
- Puyallup School District (Northwood Elementary)
- Town of Steilacoom

The Pierce County pretreatment program has the responsibility of regulating all industrial users within all but the City of Tacoma's interlocal agreement areas since the City of Tacoma has its own delegated industrial pretreatment program. The pretreatment interlocal agreement with the City of Tacoma stipulates that industrial user wastewater discharge permits are jointly issued by the City and County but must comply with the pretreatment local limits of the jurisdiction to which the wastewater discharges. The wastewater-receiving jurisdiction is primarily responsible for permit enforcement but may jointly perform inspections and enforcement actions based on mutual agreement. The specific service areas are outlined in Appendix C.

#### **A. Cascadia Wastewater Treatment Plant (Permit ST6215)**

In 2018, Pierce County assumed the responsibility for operating the Cascadia Wastewater Treatment System at Tehaleh. The County now manages a Membrane Bioreactor (MBR) treatment plant, known as the Cascadia WWTP, which serves the Tehaleh community in Bonney Lake, WA. This area is anticipated to experience significant growth in population and business development. To address this growth, the County's comprehensive pretreatment program ensures the wastewater system can effectively handle the increased demand from new and expanding businesses. The pretreatment program aims to protect the wastewater treatment plant and ensure compliance with environmental standards. The plant remains compliant with all permitted effluent limitations, maintaining its capacity to support both residential and business growth in the area.

Summarized in the table below are the commercial businesses in the service area of the Cascadia WWTP. Both elementary schools and the restaurant at the lodge underwent pretreatment reviews before 2024. The developer for the Tehaleh-Cascadia projects has ownership of all capacity for the Cascadia Wastewater Treatment System except for 100 Residential Equivalents (REs) which Pierce County owns. All proposed commercial use structures/buildings are required to submit County review applications, documents, and plans for approval by the Pretreatment Program and Developmental Engineering before the issuance of sewer use permits. All commercial customers in this development must adhere to all pretreatment regulations as outlined in Pierce County Code Title 13 Public Sanitary Sewers, Chapter 13.06 Industrial Pretreatment Regulations, as well as any regulations in associated Chapters in the Pierce County Code, and Local, State, and Federal regulations.

**Fig. 3A Cascadia Asset Pretreatment Reviews**

<b>Project Name</b>	<b>Parcel Number</b>
Wendy's	0519168002
Big Sky Park restroom	0519163018
Tehaleh Heights Elementary - Sumner SD	7002642760
Donald Eisman Elementary School - Sumner School District	0519164018
Tehaleh Welcome Center	0519163015
Sales Trailer	7002341170
Sales Office-Quadrant Homes	7002260050
Sales Office	7002260050
Trilogy at Tehaleh Clubhouse	7002341264
East Pierce Fire and Rescue - Station #117	7002741532
Ossman Harding Dental	0519168007
7-Eleven	0519168001

**B. Efforts and Projects**

- Significant Industrial User (SIU) Permitting:**  
 In 2024 the Pretreatment Program continued permitting, monitoring, and compliance activities with 2 categorical and 6 non-categorical significant industrial users for a total permitted flow of 1.24 MGD. All SIU permits are up to date.
- Dental Discharge One-Time Compliance Report:**  
 The One-Time Compliance Report for Dental Dischargers is a new EPA requirement. The Compliance Report requires dental offices that work with amalgam products and discharge wastewater to the sanitary sewer to complete the report and provide that information to their sewer service provider. Pretreatment devices like amalgam separators are used to capture and prevent heavy metals from entering the sanitary sewer system. Information collected from dental dischargers includes business name, address, number of chairs, number of amalgam separators, and amalgam separator compliance certification. For Pierce County to capture all dental dischargers within the County service area, a county database of known sites was utilized to locate and contact dental offices. Site visits of dental offices revealed that several businesses moved or went out of business, while other site visits revealed dental facilities in operation that had not been previously reviewed. Pierce County successfully captured all dental dischargers in the service area, and to maintain complete dental discharger compliance, Pretreatment staff will continue site surveys and reviews of dental

facilities.

- Minor Industrial Users:

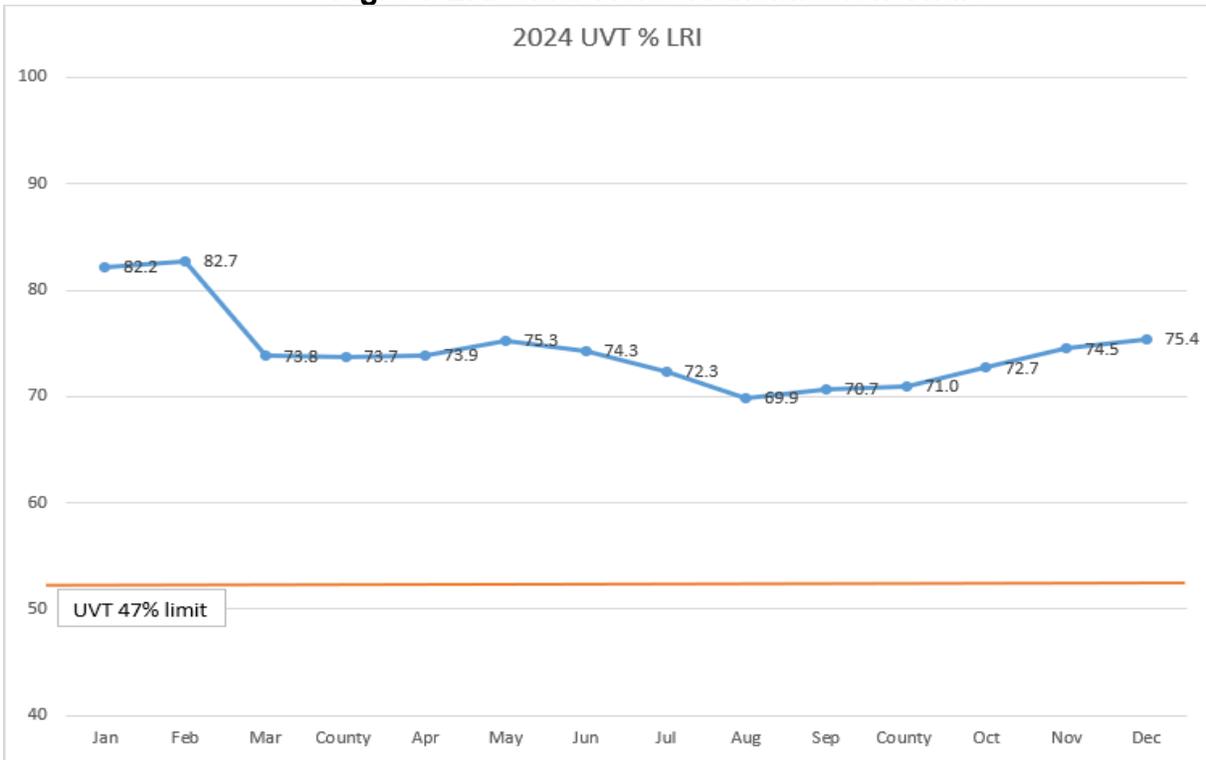
For the year 2024, 756,639 gallons of Fats, Oils, and Grease (FOG) were removed from the sewer through grease interceptor routine maintenance and pumping. The following list shows the type and number of businesses with pretreatment devices and/or control mechanisms monitored for Minor Industrial Users under the Pretreatment Program. These industrial users comply with Best Management Practices developed for each type of discharge:

Grease Interceptors	555
Offsite Silver Recycling	109
Oil/Water Separators	119
Amalgam Separators/traps	77

**C. Interference or Problems from Industrial Sources**

- LRI's pretreatment system to address UV interference issues associated with landfill leachate is achieving an annual average UV Transmittance of 74.5%. UV transmittance has improved significantly since LRI's pretreatment system came online. LRI is moving forward with additional treatment processes to address other leachate characteristics such as arsenic. Currently, they are under a compliance order with the City of Tacoma to add metal precipitation to their treatment process due to several instances of arsenic exceedances in 2023 and 2024.

**Fig. 3C LRI Ultra Violet Transmission Chart**



**D. Program Updates**

- Boeing Skin and Spar industrial wastewater discharge permit expired in November 2023; however, it was extended for 6 months, to accommodate the pending addition of PFAS monitoring in the Chambers Creek NPDES permit. The finalized Boeing industrial wastewater discharge permit was issued in June 2024.
- The City of Milton Decant Facility successfully underwent a pretreatment review for the renewal of its industrial wastewater discharge permit.
- Toray Composites Inspection – Pierce County issued and enforced Toray Composites Inc. wastewater discharge permit until 2013 and has since become one of Pierce County’s unpermitted industrial users. An onsite inspection of the facility and its documents was conducted to ensure the industrial user’s processes and wastewater discharges have not changed. It was ultimately concluded that Toray Composites Inc. remains in good standing with the County and would remain an unpermitted industrial user in the Pierce County sewer system.
- James Hardie – To address high sulfate levels in its wastewater discharge, Pierce County mandated an AKART study as part of James Hardie's Industrial

Wastewater Discharge Permit (IWDP). James Hardie subsequently shared the results of a successful sulfate reduction pilot study conducted in Pulaski, Virginia, using a Kroff Chemical treatment system. This system, which employs solids settling, filtration, and a KR DP 0811 polymer, significantly reduced sulfate concentrations. Based on these promising results, a similar sulfate treatment system is expected to be implemented at the James Hardie Frederickson sites in the future.

- Update of Industrial User Survey: An estimated total of 1,923 visits to new and existing commercial sites were conducted in 2024. These inquiries resulted in the addition and removal of a few Insignificant Industrial Users due to occupancy changes. A total of 41 Industrial Pretreatment Reviews were completed on new commercial users and existing users undergoing plumbing modifications and/or changes of ownership (see Appendix A for a detailed list of completed reviews). Pretreatment staff will continue to survey the sewer service area to maintain an updated commercial user database.

#### **E. Program changes proposed for 2025**

- Maximize usage of Hansen to track pretreatment-related assets and create inspection schedules.
- Organizational structure changes to improve the level of service and allow for employee career growth.
- Continued monitoring of the performance of LRI's new pretreatment facility.
- Pursue additional methods of monitoring, capturing, and removing fats, oils, and grease from the collection system.
- Seek additional means of minimizing nitrogen in plant influent per the Puget Sound Nutrient General Permit (PSNGP).
- Begin to survey industrial users that may be contributing to PFAS loading.
- Engage with all significant industrial users to address PFAS sampling requirements in 2025.

#### **F. Conclusions**

The pretreatment program completed in-person semi-annual inspections and sampling for all SIUs/CIUs; worked with the LRI landfill to facilitate the start-up and

operation of their pretreatment system; conducted industrial user surveys and provided timely pretreatment reviews of potential industrial users.

More industries and small businesses continue to move into our sewer service area as Pierce County continues to grow. Significant industrial users and categorical industrial users (SIUs/CIUs) with issued industrial wastewater discharge permits (IWDP) have demonstrated a high degree of compliance with pretreatment local limits and categorical discharge limits. The AKART study required by LRI achieved the goal of addressing interference issues with the UV disinfection system at CCRWWTP and was successfully concluded in 2023. LRI will continue to modify its pretreatment system to address other problematic leachate characteristics such as arsenic.

#### **4. CHAMBERS CREEK WWTP SAMPLING**

##### **A. Priority Pollutants**

The NPDES permit issued to the Chambers Creek WWTP requires annual sampling for priority pollutants and semi-annual sampling for metals. The sampling of influent, effluent, and biosolids was conducted in 2024. The samples were analyzed for metals, conventional pollutants, and organic pollutants.

24-hour composite samples of both plant influent and plant effluent were collected. Four daily grab samples were taken for volatile organic compounds. Water samples were collected with ISCO samplers and were stored and preserved according to EPA methods. Each daily sample was analyzed individually with EPA-approved methods by AMTest, Inc. of Kirkland, Washington, a Department of Ecology accredited laboratory.

A tabulation of priority pollutants is presented in Form 3 at the end of this report. The majority of the individual organics that were detected were below receiving water quality criteria except for DEHP. Metals in the influent were similar to or below the levels expected in domestic sewage.

##### **B. Biosolids Pollutant Trends**

Chambers Creek WWTP produced 1,484 dry tons of class A (EQ) biosolids for sale/giveaway as a pelletized fertilizer and disposed of 1,133 dry tons of class B biosolids to Boulder Park's beneficial use facility in 2024.

We have analyzed biosolids for 12 regulated metals since 1993. As summarized in the below tables, the concentrations of most metals are at a fraction of the biosolids land application limits for Class A exceptional quality (EQ) and Class B biosolids.

Except for molybdenum, SIUs are not the major source of contribution for these metals in our biosolids.

**Fig. 4B1. Annual Class A Biosolids Data Summary**

2024																	
Chambers Creek Regional WWTP Class A EQ Biosolids Data Summary																	
METALS	METHOD	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg.	Max.	Biosolid Land application	% of application limit
Arsenic (mg/kg)	SW-846 6010D	4.18	4.23	3.96	3.80	3.74	3.70	4.01	4.16	4.61	N/A	N/A	N/A	4.04	4.61	41	10
Boron (mg/kg)	SW-846 6010D	22.7	23.1	43.5	55.7	44.4	30.8	28.0	21.8	24.0	N/A	N/A	N/A	32.7	55.7		
Cadmium (mg/kg)	SW-846 6010D	0.94	1.20	1.11	1.00	0.97	0.87	0.92	0.91	0.98	N/A	N/A	N/A	0.99	1.20	39	3
Chromium (mg/kg)	SW-846 6010D	66.3	65.1	59.7	56.9	53.8	53.3	54.5	49.0	51.0	N/A	N/A	N/A	56.6	66.3		
Copper (mg/kg)	SW-846 6010D	299	286	320	323	320	252	276	300	320	N/A	N/A	N/A	300	323	1500	20
Cobalt (mg/kg)	SW-846 6010D	1.29	1.85	1.51	1.48	1.63	1.53	1.76	1.52	1.48	N/A	N/A	N/A	1.56	1.85		
Mercury (mg/kg)	SW-846 7471B	1.440	1.410	2.490	1.710	1.800	1.690	1.670	1.370	1.410	N/A	N/A	N/A	1.64	2.490	17	10
Potassium (mg/kg)	SW-846 6010D	2,110	2,020	2,450	2,540	2,800	1,890	2,160	2,050	1,840	N/A	N/A	N/A	2,207	2,800		
Molybdenum (mg/kg)	SW-846 6010D	13.7	15.0	14.9	14.4	14.0	14.3	14.1	14.2	13.9	N/A	N/A	N/A	14.3	15.0	75	19
Nickel (mg/kg)	SW-846 6010D	13.9	1.6	3.8	<1.0	12.4	11.0	<1.1	12.0	<1.1	N/A	N/A	N/A	6.4	13.9	420	2
Lead (mg/kg)	SW-846 6010D	13.2	14.1	13.6	11.2	11.5	8.72	11.10	9.05	9.60	N/A	N/A	N/A	11.3	14.1	300	4
Selenium (mg/kg)	SW-846 6010D	7.33	8.95	9.14	10.1	9.89	9.4	9.34	8.64	8.43	N/A	N/A	N/A	9.02	10.1	100	9
Silver (mg/kg)	SW-846 6010D	2.10	1.95	2.16	1.90	1.92	1.70	2.00	2.12	1.97	N/A	N/A	N/A	1.98	2.16		
Zinc (mg/kg)	SW-846 6010D	687	710	681	654	652	558	596	680	703	N/A	N/A	N/A	658	710	2800	23
Iron (mg/kg)	SW-846 6010D	4,530	4,980	4,570	4,660	4,290	3,800	3,960	3,590	3,960	N/A	N/A	N/A	4,260	4,980		
Calcium (mg/kg)	SW-846 6010D	20,500	21,200	20,300	21,900	21,200	17,800	19,500	21,500	21,200	N/A	N/A	N/A	20,567	21,900		
Magnesium (mg/kg)	SW-846 6010D	10,100	9,340	8,020	8,080	8,350	8,750	9,990	10,000	9,560	N/A	N/A	N/A	9,132	10,100		
Ammonia (mg/kg)	Plumb 1981	7,400	7,500	7,000	14,200	14,300	18,500	16,200	14,700	14,900	N/A	N/A	N/A	12,744	18,500		
TN (mg/kg)	SM 4500 N C	68,000	67,000	65,000	61,900	61,700	61,900	50,300	36,900	58,700	N/A	N/A	N/A	59,044	68,000		
Total Phosphorous (mg/kg)	SM 4500 P F	27,000	24,000	22,000	24,700	49,000	62,500	29,500	26,200	29,000	N/A	N/A	N/A	32,656	62,500		
Nitrate + Nitrite (mg/kg)	SM4500 NO3 F	14.0	9.3	3.0	10.2	0.1	<1.4	5.9	9.1	9.3	N/A	N/A	N/A	6.92	14.0		
VAR-Monthly Avg % TS (>75%) 173-308-180(E)	SM 2540 G	94	92	92	91	92	92	90	92	92				92	94		
Fecal Coliform (MPN/g) - In house	SM 9221 E		2	14	2.8	1	2	26	9	9			4	7.78	26.4		
pH (S.U.)	SW-846 9045 D	6.7	7.2	7.1	6.9	6.4	6.8	7.1	6.5	6.9	N/A	N/A	N/A	6.84	7.2		
*Fecal Coliform: results are in MPN/100g as numbers per 1G are too low to quantify per contract lab																	
**VAR changed from (>38% option 1) to (>75% option 5) per DOE December 20																	
***Ammonia changed from Total Ammonia to Available Ammonia per DOE request June 2020																	
****Average calculations do NOT include 1/2 reporting limit for less than results.																	

**Fig. 4B2. Annual Class B Cake Data Summary**

2024																	
Pierce County Chambers Creek Regional WWTP Class B Cake Data Summary																	
METALS	METHOD	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg.	Max.	Biosolid Land application	% of application limit
Arsenic (mg/kg)	SW-846 6010D	5.76	4.90	5.05	4.07	4.45	4.52	4.19	4.97	4.85	5.32	5.13	5.42	4.89	5.76	41	12
Boron (mg/kg)	SW-846 6010D	25.2	36.2	34.1	51.3	55.1	43.1	27.9	28.0	25.5	35.6	42.3	36.0	36.7	55.1		
Cadmium (mg/kg)	SW-846 6010D	<2.31	<2.04	<1.62	<1.53	<2.63	<2.69	<2.08	<1.91	<1.75	<2.23	<2.14	<2.43	2.11	2.69	39	5
Chromium (mg/kg)	SW-846 6010D	70.7	71.3	66.8	55.8	61.2	59.2	53.4	57	49.7	52.4	54.9	50.6	58.6	71.3		
Copper (mg/kg)	SW-846 6010D	324	337	311	307	337	347	276	313	341	368	362	310	328	368	1500	22
Cobalt (mg/kg)	SW-846 6010D	<2.30	<2.04	3.51	1.56	<2.63	<2.69	<2.08	2.04	<1.75	<2.23	<2.14	<2.43	2.28	3.51		
Mercury (mg/kg)	SW-846 7471B	1.24	1.43	1.16	2.58	1.80	2.29	1.74	1.73	1.67	1.47	1.28	1.20	1.63	2.58	17	10
Potassium (mg/kg)	SW-846 6010D	2,750	2,150	1,980	2,280	2,470	2,850	2,130	2,520	2,170	2,080	1,980	1,940	2,275	2,850		
Molybdenum (mg/kg)	SW-846 6010D	17.5	17.8	16.1	15.2	16.5	16.0	17.4	16.5	15.8	17.1	17.2	15.3	16.5	17.8	75	22
Nickel (mg/kg)	SW-846 6010D	16.6	17.2	10.1	<3.1	<5.3	14.5	10.7	<3.8	11.8	<4.5	<4.3	10.8	9.4	17.2	420	2
Lead (mg/kg)	SW-846 6010D	14.0	16.3	14.3	13.1	13.2	<13.4	<10.4	11.3	9.9	<11.2	11.6	12.7	12.6	16.3	300	4
Selenium (mg/kg)	SW-846 6010D	9.04	7.38	9.23	8.74	11.0	10.5	9.5	9.76	9.01	9.59	8.50	8.91	9.26	11.0	100	9
Silver (mg/kg)	SW-846 6010D	<4.61	<4.08	<3.23	<3.07	<5.25	<5.38	<4.17	<3.83	<3.51	<4.46	<4.3	<4.85	4.23	5.4		
Zinc (mg/kg)	SW-846 6010D	803	792	769	698	779	759	629	716	751	822	863	771	763	863	2800	27
Iron (mg/kg)	SW-846 6010D	5,150	5,540	5,530	4,610	5,020	4,920	3,890	4,300	3,870	4,980	4,910	4,340	4,755	5,540		
Calcium (mg/kg)	SW-846 6010D	23,200	23,800	22,600	20,600	24,500	23,800	18,700	21,600	21,100	24,000	25,000	22,900	22,650	25,000		
Magnesium (mg/kg)	SW-846 6010D	12,100	10,900	9,620	8,540	10,300	11,700	10,200	11,300	10,400	10,500	10,100	10,500	10,513	12,100		
Total Sulfur (mg/kg)	SW-846 6010D	8,480	8,560	8,890	7,740	8,950	8,670	7,280	8,090	8,150	8,840	8,770	7,560	8,332	8,950		
*Ammonia (mg/kg)	Plumb 1981	15,000	16,000	17,000	17,000	22,600	26,400	25,300	26,400	22,700	22,700	23,800	24,200	21,592	26,400		
TN (TKN) (mg/kg)	SM 4500-N C	76,000	79,000	77,000	75,000	65,500	78,000	75,100	73,500	72,700	73,900	66,200	72,000	73,658	79,000		
Total Phosphorous (mg/kg)	SM 4500-PF	27,000	25,000	24,000	24,000	29,800	59,000	62,100	33,700	25,100	29,500	25,500	24,700	32,450	62,100		
Nitrate (mg/kg)	SM4500 NO3-F	18.0	24.0	3.5	<2.5	<0.1	<0.1	<3.9	<4.3	<4.3	<4	<5.3	<3.7	6.18	24.0		
VAR-Avg % (>38% 173-308-180(1))	SM 2540 G	71	73	68	62	63	63	63	66	68	68	64	64	66	74		
Avg % Total Solids	SM 2540 G	19.8	19.5	19.2	19.6	19.8	20.4	19.7	20.3	20.9	20.5	20.3	19.6	20.0	21.4		
pH (S.U.)	SW-846 9045 D	7.0	7.3	8.5	7.5	7.0	7.2	7.5	7.6	7.3	8.0	7.7	7.9	7.54	8.50		

\*Ammonia changed to Available Ammonia (KCl extract) June 2020 per DOE request.

**5. EVALUATION OF LOCAL LIMITS**

Our past efforts to evaluate local limits have shown that the most stringent criteria are heavy metal concentrations for biosolids land application. Our monitoring data has consistently shown that organic priority pollutants are not pollutants of concern when it comes to local limit evaluation. Thus, we focused our 2024 local limit evaluation effort on heavy metals from our semi-annual metals sampling events this year. Evaluation of removal efficiency indicates that the current local limits are sufficient for maintaining low levels of pollutants in the treatment plant’s effluent and biosolids.

The table contained in forms labeled “Form 4” at the end of this report illustrates the sufficiency of the pretreatment program’s current local limits. With the

implementation of biological nutrient reduction at the treatment plant, nitrification inhibition limits have been added to Form 4 and are included in the calculations.

## **6. INDUSTRIAL USER SURVEY AND PRETREATMENT REVIEW**

The pretreatment program maintains an industrial user database that is continuously reviewed and updated. All pertinent user information is contained in the pretreatment database, on the Sewer Division's Infor/Hansen computerized maintenance management software (CMMS). This database combines user location data, pretreatment device information, and compliance history and is operated and updated by pretreatment staff. Additionally, the sewer billing department maintains an updated database of commercial accounts in their billing software, which is accessible by pretreatment staff and referenced when determining whether a commercial account is active. Detailed supplementary documents, such as construction plans and past pretreatment applications, are stored in the Planning and Land Services database, PALS+. The Infor/Hansen database is updated by cross-referencing its information with the other Pierce County databases, as well as through the review of new sewer use applications, field inspection notes, newspaper articles, and information provided by other jurisdictions.

The commercial accounts in Infor/Hansen can be searched and sorted by any field including address, parcel, or business name. Each account is assigned a two-letter significance class, the first letter of which indicates whether they are categorical (C), significant non-categorical (S), Minor (M), or Insignificant (I). The second letter generally denotes spill or accidental discharge potential: Low (L), Medium (M), or High (H). In cases of zero discharge categorical users, the second letter will be "Z" to denote users with categorical processes but no categorical discharge. Each user is also assigned a general SIC code to specify its industry.

The Pretreatment Program conducts its industrial user survey continuously, intending to confirm the continued operation of each business a minimum of every five years. Significant industrial users and minor industrial users with pretreatment devices are tracked more frequently since they are required to send in records a minimum of once per year. There is less frequent interaction with insignificant industrial users, however, pretreatment technicians are notified by the sewer development engineers whenever new commercial users, including insignificant industrial users, are being issued a sewer use permit.

All new businesses are reviewed for any potential pretreatment requirements by a pretreatment technician. The Pretreatment review process begins with the submittal of completed applications for commercial project review to the County Development Engineering Department along with documents, plans, pretreatment device manufacturers cut sheets and sizing calculations, Safety Data Sheets, spill plans, and

any other documents/drawings that both departments requested during the application review process. The County Pretreatment Program will be contacted by Development Engineering when a commercial review has been submitted with the application number in the PALS+ (Planning and Land Services) database where the review documents can be found. Pretreatment personnel will conduct a separate review of the documents for any pretreatment-related concerns and submit their comments to Development Engineering who will then combine the comments and send correspondence to the project contacts either approving the project or requesting more information/documentation to complete the project review. This process may entail further back-and-forth correspondence between Pretreatment and Development Engineering personnel, and between Engineering and the project contacts as well as meetings with the project contacts and Pretreatment or Engineering personnel or both, to better understand a project and convey what further information may be required to complete the project review on time.

Some projects have submitted an initial pretreatment review this year but need to respond to initial review comments/questions, revised plans, and/or supply any document(s) required to complete the review. Further reviews for these projects will be included in the Annual Report for 2025. A list of Pretreatment Reviews for 2024 is in Appendix A.

Additionally, all new commercial sewer accounts are reviewed monthly through the sewer billing database to ensure they have all undergone a pretreatment review.

Since certain portions of the Pierce County sewer service area are under the jurisdiction of interlocal agreements, the County relies on additional aid from other municipalities to maintain an updated user database. The City of Tacoma provides the County quarterly updates on commercial users in the Western Slopes area, and pretreatment staff performs inspections to verify the information provided. Both the Western Slopes area and Steilacoom are covered under inter-jurisdictional pretreatment agreements between these Cities and the County. Under the agreement, Tacoma and Steilacoom review new users and will notify the County of any pretreatment problems or new significant users. Steilacoom and Tacoma's records show that no significant industrial dischargers are currently present in these areas, which are primarily residential and light retail/commercial.

The Pretreatment Program will continue to optimize its current business tracking system to achieve its goal of reviewing all industrial users on a 5-year basis.

## **7. SIGNIFICANT INDUSTRIAL USER COMPLIANCE SUMMARY**

This section contains a summary of pretreatment activities for permitted significant and minor industries: the Boeing Skin and Spar Facility, Land Recovery Incorporated's

Hidden Valley Landfill, James Hardie Building Products Tacoma 1, James Hardie Building Products Tacoma 2, Fredrickson Power, Niagara Bottling LLC, Pierce County Decant Facility, and City of Milton Decant Facility. It includes compliance comparisons (Form 7 at the end of this report), County inspections, reporting, correspondence, violations, county monitoring, self-monitoring sampling results, and corresponding local limits. The County's local limits are generally the applicable limits for each of these industries; however, Boeing has categorical daily and monthly average limits that supersede the County's limits on cadmium, silver, and zinc. At the end of this report, Form 6 contains an industrial compliance summary for significant dischargers. No compliance summary for the City of Milton Decant Facility is included since it is primarily regulated by the City of Tacoma through the interlocal agreement.

## **A. Categorical Industries**

### **Boeing Skin & Spar**

The Boeing Corporation Skin and Spar facility is a metal finishing categorical user in the Frederickson service area. This Boeing facility performs a boric acid anodizing process on aluminum airplane parts, along with cleaning and inspection procedures. Wastewater from these processes is treated in a metals precipitation unit and is pH-adjusted with the boric acid waste hauled offsite. This plant also operates large autoclaves for curing carbon fiber airframe components. Blowdown from a cooling tower serving the autoclaves and a chiller serving the spar facility is discharged. Water conditioning chemicals added to the cooling tower blowdown contributed a significant amount of molybdenum. Boeing conducted routine sampling to monitor pollutant levels and has had success with voluntary efforts to reduce molybdenum discharges by changing to a non-molybdenum corrosion inhibitor in their cooling tower. Permission for the new inhibitor was granted to Boeing from the County in 2021. The data presented to the County in 2023 showed that the switch in cooling tower additives had consistently reduced molybdenum concentration by two orders of magnitude and total loading by three orders of magnitude, remaining well below the benchmark of 1.8 lbs/day for over a year. Pretreatment staff sampled the Boeing facility twice in 2024 in addition to conducting an annual inspection. Sampling results corresponded with Boeing's self-monitoring, indicating compliance.

Boeing was up for renewal of its industrial wastewater discharge permit in 2023 following a pretreatment review completed by the pretreatment program and development engineering office of Planning & Public Works. No major process changes were requested. The only permit change is the removal of monthly molybdenum sampling at the SSL55 location. Boeing was granted an extension for their 2018 permit, due to the upcoming addition of PFAS monitoring being included in the Chambers Creek permit scheduled for renewal in 2024.

No NOVs or penalties were issued to Boeing Skin & Spar in 2024.

## Correspondence 2024:

02/13/2024: Pierce County sampled Boeing for nitrate using TNT vials. The grab sample resulted in 5.72mg/l. The composite will be tested for Nitrate at the semi-annual sampling event scheduled for March.

02/23/2024: The January DMR mentioned a faulty flow meter. A call was requested from Boeing to the County to discuss this further. The call was received, the issue was explained, and Boeing could get ahead of the problem.

03/11/2024: The first semi-annual sampling event of the year was conducted without any issues.

03/13/2024: Results for nitrate were 10.6mg/L. An email was sent to Jim Swortz to ask about their source of nitrate. He responded that the rinse waters of the solutions they treat are 20-37% nitric acid-based.

06/1/2024: The new permit went into effect.

07/24/2024: The second semi-annual sampling event of the year was conducted without any issues.

09/20/2024: Chambers Creek Operations noticed a change in the sludge. SIUs, including Boeing, were asked if any process changes could have affected the sludge. Boeing confirmed there were no process changes on their end.

09/24/2024: Boeing requested to discharge from their Boilers, for annual maintenance. Analytical was sent and reviewed.

10/30/2024: Received Boeing's updated spill prevention plan.

## **Fredrickson Power**

Frederickson Power generates electricity using both natural gas and steam-powered turbines. Steam generation of electricity is a categorical process, which therefore requires Frederickson Power to obtain a categorical discharge permit. Tenaska Washington Partners issued A permit for a combustion turbine/steam turbine power generating plant built in the Frederickson Industrial Park. This plant never began operation and was eventually purchased by Frederickson Power. Frederickson Power completed construction and met County requirements to take over the existing permit,

which was reissued in the year 2000. The current permit was renewed in 2022.

Frederickson Power demonstrated a high degree of compliance during 2024, with minimal correspondence necessary. Frederickson Power initiated a pilot study to attempt to reduce their sulfate production, Pierce County expects to see the results of the study in 2024. Routine sampling events and an annual inspection did not reveal any local limit violations or prohibited discharges.

No NOVs or penalties were issued to Fredrickson Power in 2024.

Correspondence 2024:

02/13/2024: Pierce County sampled Fred Power for nitrate, using TNT vials. The grab sample resulted in 1.70mg/l which provides no concerns for the County.

02/23/2024: Pierce County contacted Fred Power to ask them for an update on their sulfur reduction project.

02/26/2024: Pierce County received an official report from Fred Power of their sulfur study. The data showed that there was a 42% reduction in their sulfur production.

03/5/2024: Fred Power requested to submit electronic copies of DMR, the request was approved by the Pretreatment Supervisor.

05/10/2024: Fred Power was informed of the addition of PFAS sampling and testing. They were given the same language that was used for other permits. They said they were ok with receiving a memo, when the time came, instead of going through a permit revision.

08/21/2024: The County asked Fred Power about their increase in sulfate, as observed in their semi-annual sampling results. It was explained that during the summertime, water evaporation increases in the cooling tower, and pH needed to be lowered from 8.4 to 8.3 to deal with the potential fouling of the heat exchangers. Sulfuric acid ( $H_2SO_4$ ) is used for pH adjustment, which contributes to sulfate concentration in discharged process wastewater.

09/19/2024: Fred Power reported no changes to their processes that would cause a change in the sludge at Chambers Creek Wastewater Treatment Plant.

## **B. Non-Categorical SIU's**

### **LRI/Hidden Valley Landfill**

Hidden Valley Landfill discharges treated leachate from lined cells that contain municipal solid waste. The original landfill is now closed, but it continues to produce leachate. Additional leachate is trucked to the Hidden Valley facility from the operational 304<sup>th</sup> Street landfill. LRI's new MBR pretreatment facility has been running and generating a quality discharge that supports high UV transmittance, allowing them to achieve tier two of their IDWP with a flow of 61,624 gpd. Pretreatment program plans for 2024 include the review of LRI's monthly wastewater discharge reports, continued monitoring and sampling of industrial user activities that generate wastewater, and overseeing the progress of their compliance order from the City of Tacoma which will implement metal precipitation for control of their metals discharge.

One NOV or penalty was issued to LRI in 2024.

3/6/2024 – NONC sent for modification of pretreatment equipment, WW-24003.

Correspondence 2024:

01/8/2024: LRI requested temporary additional flow into the PC sewer system.

01/17/2024: LRI revised their arsenic compliance schedule due to membrane fouling occurring in 12/2023.

01/18/2024: LRI & County sent the special agreement to DOE for temporary additional discharge flow, County granting 80,000 gpd revisited weekly after plant data review.

01/29/2024: LRI began temporary additional discharge of 79,900 gpd.

02/2/2024: LRI limited to 80,000 gpd for an additional week due to interference at the plant (increased nitrate and PAO reduction), however, plant effluent UVT and fecal coliforms were not affected.

02/12/2024: County will allow 100,000 gpd increased temporary flow starting 2/12; actual discharge volume approximately 99,910 gpd.

02/14/2024: LRI requested 20,000 gallons of seed sludge for their MBR treatment plant, and received 13,000 gallons, 6,500 gallons each on 2/16 & 2/19. Received January DMR and it had low influent TSS and high effluent TSS on 01/16/2024, an investigation into this led to a discussion regarding managing excessive flow and how LRI handled it.

02/23/2024: The County will allow 110,000 gpd increased temporary flow starting 2/26 until LRI is caught up and isn't holding any excess leachate.

03/6/2024: LRI was issued a Notice of Non-Conformance: To create capacity in the MBR process, operators moved the centrate to the permeate tank and contaminated the permeate tank which led to high effluent TSS. They did not give the county advanced notification of the modification of their pretreatment system (Part VII, Section C of the IDWP) and therefore the NONC was issued.

04/19/2024: LRI meeting to discuss increasing permitted flow capacity.

07/15/2024: Received the June DMR with a copper result of 1.2 mg/L, exceeding the local limit. LRI had their lab reanalyze their June 5<sup>th</sup> sample and the result was much lower at 0.032 mg/L. LRI sent a revised DMR on 07/24/2024 with an explanation.

### **James Hardie Building Products Tacoma 1**

James Hardie Building Products Tacoma 1 began discharging in May of 1998. James Hardie manufactures cement-based building materials: principally a siding product made from cement and paper fiber. James Hardie conducts pretreatment for the removal of paint solids, pH adjustment, and reduction of chromium. The sand and cement used in manufacturing are sources of molybdenum, as such, James Hardie conducts routine self-monitoring of pollutant levels and has agreed to and implemented a set of Best Management Practices to evaluate and control the discharge of molybdenum. The practices include enhanced weekly monitoring of molybdenum discharge levels and minimization of the use of any molybdenum-containing additives or lubricants that could contribute to the molybdenum discharge. A past change in cement sources has increased selenium concentrations in James Hardie effluent, therefore additional selenium monitoring is also required in their discharge permit.

In 2018, the County began referring to this original James Hardie site as James Hardie Tacoma 1, after the completion of James Hardie's second Tacoma site, Tacoma 2 (see next section).

Routine sampling events and an annual inspection did not reveal any local limit violations or prohibited discharges. Pretreatment program plans for 2024 include the continued review of James Hardie's monthly wastewater discharge reports and continued monitoring and sampling of industrial activities that generate wastewater.

With the issuance of the new nutrient general permit, the County has taken steps to calculate the ammonia loading in pounds from its significant industrial users. A conversion equation using flow and the SIU ammonia concentration determined that

the James Hardie Tacoma 1 plant is not a significant contributor of nutrients to the Pierce County collection system.

No NOVs or penalties were issued to James Hardie Tacoma 1 in 2024.

Correspondence for 2024:

01/16/2024: James Hardie's consultant group, BHC, reached out to the County in hopes of coordinating an in-person meeting to discuss potential further efforts for implementing an AKART study.

02/01/2024: Pretreatment program staff reached out to the James Hardie point of contact to inquire about the potential addition of ammonia in the manufacturing process resulting in elevated ammonia results from semi-annual sampling.

02/05/2024: James Hardie point of contact responded to the County's inquiry about ammonia loading stating, "There is nothing in our manufacturing process that I know of that would cause Ammonia nor do we add it."

02/16/2024: Pretreatment program staff collected a grab sample of James Hardie wastewater and analyzed the sample for nitrate. James Hardie's 2.23 mg/L nitrate result was deemed to have no significant impact on the treatment plant's overall nitrate loading. This sample was analyzed in conjunction with nitrate monitoring conducted at the CCWWTP.

05/13/2024: Pretreatment program staff sent an email to James Hardie representatives informing them of the upcoming mandatory PFAS sample collection and analysis. This sampling and analysis of PFAS in SIU wastewater will begin in 2025.

07/11/2024: Pretreatment program staff contacted James Hardie representatives to schedule and confirm the date and time to complete the second semi-annual sampling event. Pretreatment program staff also answered James Hardie's questions concerning permit-required PFAS testing in 2025.

09/20/2024: Pretreatment program staff contacted James Hardie representatives to inquire about any changes that have been made to their manufacturing and or treatment process. James Hardie responded, informing the County that no changes had been made to manufacturing or treatment processes.

## **James Hardie Building Products Tacoma 2**

James Hardie Building Products completed construction on their second production location in Pierce County in the summer of 2018 after an extended plan review performed by the Pierce County Pretreatment Program and Development Engineering Office. The second site is now known as Tacoma 2, while the original site is now referred to as Tacoma 1. Tacoma 2 produces the same type of material as Tacoma 1, which is various types of fiber cement siding. Tacoma 2 is however designed to achieve much higher production rates, which in turn is expected to produce a much larger volume of industrial wastewater discharge. The permitted discharge for this site is 350,000 gallons per day, which James Hardie expects to ramp up over time.

The wastewater produced at this site is expected to be of similar quality to that produced at Tacoma 1, however, James Hardie has constructed a slightly different treatment system at Tacoma 2. They are utilizing inclined plate clarifiers for more efficient settling capacity, as well as a rotary vacuum dewatering unit for drying solids. All testing in 2018, indicates that this pretreatment system is sufficient in reducing pollutants of concern in James Hardie's industrial wastewater stream.

Throughout 2024, the pretreatment program continued to conduct various activities related to sulfate and hydrogen sulfide monitoring due to the potential high concentration of sulfate anticipated to be discharged from this facility. Routine sampling events and an annual inspection did not reveal any local limit violations or prohibited discharges. In 2024, Pretreatment continued the review of James Hardie's Tacoma 2 plant's monthly wastewater discharge reports, continued monitoring and sampling of industrial activities that generate wastewater, and pilot testing of treatment technologies to mitigate the impact of high sulfate loadings on the County's collection system.

No NOVs or penalties were issued to James Hardie Tacoma 2 in 2024.

### Correspondence 2024:

01/16/2024: James Hardie's consultant group, BHC, reached out to the County in hopes of coordinating an in-person meeting to discuss potential further efforts for implementing an AKART study.

02/01/2024: Pretreatment program staff reached out to the James Hardie point of contact to inquire about the potential addition of ammonia in the manufacturing process resulting in elevated ammonia results from semi-annual sampling.

02/05/2024: James Hardie point of contact responded to the County's inquiry about ammonia loading stating, "There is nothing in our manufacturing process that I know of that would cause Ammonia nor do we add it."

02/16/2024: Pretreatment program staff collected a grab sample of James Hardie wastewater and analyzed the sample for nitrate. James Hardie's 1.00 mg/L nitrate result was deemed to have no significant impact on the treatment plant's overall nitrate loading. This sample was analyzed in conjunction with nitrate monitoring conducted at the CCWWTP.

05/13/2024: Pretreatment program staff sent an email to James Hardie representatives informing them of the upcoming mandatory PFAS sample collection and analysis. This sampling and analysis of PFAS in SIU wastewater will begin in 2025.

05/15/2024: Pretreatment program staff made contact with James Hardie's representative to inquire about elevated pH results for April. The elevated pH was intentional due to the plant's CO2 shortage.

07/11/2024: Pretreatment program staff fielded James Hardie's question concerning the permit-required PFAS testing and analysis beginning in 2025.

09/20/2024: Pretreatment program staff contacted James Hardie representatives to inquire about any changes that have been made to their manufacturing and or treatment process. James Hardie responded, informing the County that no changes had been made to manufacturing or treatment processes.

11/20/2024: Pierce County and James Hardie representatives met to discuss the potential increase in daily wastewater flow from the addition of a new autoclave at the Tacoma 2 site. James Hardie also agreed to provide the County with updated information on James Hardie's efforts to reduce sulfate in its wastewater discharge.

### **Niagara Bottling LLC**

Niagara's primary business activities are the filtration and bottling of drinking water as well as the manufacturing of caps and bottles. The wastewater discharge is mostly derived from reject streams from reverse osmosis treatment of drinking water, carbon filter backwash, and boiler blowdown. Pretreatment consists of pH adjustment from the application of caustics and or acids used in the facility's neutralization tanks. Niagara Bottling Company did not record any violations in 2024. The County acknowledges the compliance improvement in 2023 and 2024 compared to 2022.

One NOV or penalty was issued to Niagara in 2024.

Correspondence for 2024:

02/16/24: A site visit to test nitrate discharge, the result was 2.88 mg/L NO<sub>3</sub> for a grab sample, the sample was taken at the end of the CIP process where nitric acid is used.

02/21/24: Site visit to complete semi-annual sampling, composite sample result for NO<sub>3</sub> was 0.83 mg/L.

06/03/24: Received written notification that pH excursion occurred.

06/05/24: Site visit to complete semi-annual sampling and annual compliance inspection.

06/09/24: Received written explanation for pH excursion.

### **Pierce County Decant Facility**

Wastewater from Pierce County's own Central Maintenance Facility Decant Station (PC Decant) is regulated by Pierce County Sewer Division Prohibited Discharges and Industrial Pretreatment Regulations. The facility is considered a significant discharger, based solely on the receipt of wastes generated elsewhere and taken to the station for treatment. There are no applicable federal or state discharge standards and the wastewater discharge is subject only to local discharge limits.

Pierce County Planning & Public Works, Road Operations is responsible for the management of all County roadways. These responsibilities include the periodic cleaning of stormwater catch basins, debris collection, as well as routine street sweeping. These materials are primarily collected and transported by Vactor trucks. The Road Operations vactor trucks are not used for cleaning sewer lines. The materials recovered from catch basin cleaning activities are wet and must be dried before re-use or disposal. The initial drying of the material occurs on sloped pads which allow gravity drainage of the water from the material, known as decanting. The decant station treats approximately 14,000 gallons of water per day under peak operations or 1,000 gallons per day under normal operations. Peak operation is generally from April through July. Daily discharge volume is limited to 6,300 gallons. The major facility components are an open-sided building, decanting areas, settling tanks, a flocculation tank, and an oil/water separator. A carbon filter was added in 2018 to allow water reuse and sodium hypochlorite was added in June of 2018 to help with algae growth in the flocculation tank. Chlorine levels are tested before discharge. In May 2018, they added a flow meter to measure the volume discharged, instead of calculating discharge based on pump run time.

No NOVs or penalties were issued to PC Decant Facility in 2024.

Correspondence for 2024:

01/31/2024: CMF Decant submitted the documents for the permit renewal.

03/05/2024: A mistake was noted on February's DMR, which showed discharges on 02/02/2024. This discharge sheet indicated discharges on 2/1 and 2/2. The staff resubmitted the corrected DMR.

05/10/2024: The new NPDES permit was sent to the Decant Facility staff.

05/14/2024: The new Industrial Wastewater Discharge Permit went into effect.

### **City of Milton Decant Facility**

The facility is considered a significant discharger, based solely on the receipt of wastes generated elsewhere and taken to the station for treatment. There are no applicable federal or state discharge standards and the wastewater discharge is subject only to local discharge limits. This facility was issued an industrial discharge permit on April 1, 2019. This permit is issued as part of an interlocal agreement between Pierce County and the City of Tacoma since this site is in Pierce County's sewer service area with the wastewater produced ultimately being treated by the City of Tacoma Central Treatment Plant. Per the interlocal agreement, Pierce County will handle the permitting, billing, and enforcement activities for this facility, while Tacoma will handle the sampling and inspections. The pretreatment program has included the continued review of the City of Milton Decant Facility's monthly wastewater discharge reports and continued monitoring of industrial user activities that generate wastewater. The city of Milton Decant Facility will be up for permit renewal in 2024.

No NOVs or penalties were issued to the City of Milton Decant Facility in 2024 as reported by the City of Tacoma.

Correspondence for 2024:

02/14/2024: The City of Milton Decant Facility POC submitted the January discharge monitoring report.

02/16/2024: The County met virtually with the City of Milton Decant Facility POC to further discuss the industrial wastewater discharge permit renewal.

02/21/2024: Permit renewal application documents submitted, SWDR #1030957.

04/01/2024: The City of Milton Decant Facility was issued a renewed Industrial Wastewater Discharge Permit.

### **C. Former or potential Significant Dischargers**

#### **DuPont Decant Facility (postponed indefinitely)**

The City of DuPont has proposed the construction of a decant facility to dispose of waste material collected from stormwater catch basins and hydro excavation activities. The City of DuPont Public Works is responsible for the management of all City of DuPont roadways. These responsibilities include the periodic cleaning of stormwater catch basins, debris collection, as well as routine street sweeping. These materials are primarily collected and transported by Vector trucks. The Vector trucks are not used for cleaning sewer lines. The materials recovered from catch basin cleaning activities are wet and must be dried before re-use or disposal. The initial drying of the materials occurs on sloped pads which allow for gravity drainage of the water from the materials. This is known as decanting. The decant station treats up to an estimated 6,700 gallons of water per day under peak operations. Peak operation is generally from April through July with minimal use in the winter months. The major facility components will consist of a decanting area/ drying pad, a settling vault, a brine mixture pit, and an oil/water separator.

This facility initially went through Pierce County's industrial user permitting process and may ultimately be considered a significant discharger, based solely on the receipt of wastes generated elsewhere and taken to the station for treatment. There are no applicable federal or state discharge standards and the wastewater discharge is subject only to local discharge limits.

### **D. Industrial Monitoring Schedule**

Significant industries are sampled at least twice per year. Industries are also monitored on demand whenever a violation is suspected, or a problem is reported. An agreement with the City of Tacoma specifies that, for inter-jurisdictional situations, the entity that receives a user's discharge performs the monitoring. The County performs all verification monitoring for users in other jurisdictions.

The pretreatment staff intends to inspect or contact all priority minor industries annually to confirm compliance with the Pretreatment and Accidental Spill Program requirements. Priority is put on the businesses having the greatest potential to pollute or cause spills. Best Management Practices have been developed for food services, automobile services, schools and hospitals, photographic processing, printing, and dental offices. The focus of most inspections is accidental spill prevention and public

education. Most businesses do not have a process discharge.

Records for commercial businesses discharging to the County are maintained in the established industrial pretreatment Infor/Hansen database. This program is continually updated from billing records, permit records, the information provided from inter-jurisdictional areas, and pretreatment inspections. The program generates scheduled inspection work orders for all accounts based on assigned inspection frequencies or default values.

All commercial users are initially given an annual inspection frequency. System-generated inspection schedules are then reviewed to determine if the frequency is appropriate. Insignificant users are verified, and inspection frequencies dropped to every three years. Low-risk minor users are inspected initially and then dropped to a two-year frequency. Priority minor users are inspected annually.

Throughout the year, pretreatment staff generates a monthly list of inspections due. The staff does not perform every inspection called for but prioritizes the list and inspects the higher priorities. Uninspected users will accumulate on the monthly lists until they are inspected or removed from the list. If they are removed or if they are inspected, they will appear again at the end of the next inspection interval.

Pretreatment staff conducted 1,923 total evaluations and/or inspections in 2024, including the number of visits for follow-up, technical assistance, and educational/training activities. The extent of the inspections varies but can include: a brief visit or a phone call to verify that occupancy and type of business have not changed, pretreatment device inspections, or a full-day physical inspection and three-day sampling event for SIUs. The greatest percentage of time is allocated to significant users and priority minor users.

## **8. ENFORCEMENT ACTIVITY**

Pretreatment staff conducted a variety of initial and follow-up enforcement actions in 2024. The level of action ranges from phone calls and informal meetings to notifications of violations with compliance schedules. These actions were taken due to deficiencies or violations discovered from self-monitoring, POTW monitoring, during routine inspections, or in the case of restaurants, due to grease accumulation in the collection system. Calls and meetings were held to clarify pretreatment requirements. Letters were typically sent to require correction of deficiencies (grease interceptor maintenance, silver recovery unit installation or maintenance, housekeeping, or submittal of Accidental Spill Prevention Plans). Enforcement actions taken for significant industrial dischargers are described under their headings in Section 6/7 and Form 8 at the end of this report provides an enforcement summary for SIUs.

Minor deficiencies discovered during inspections such as poor housekeeping,

inadequate grease interceptor maintenance, silver recovery unit maintenance, sampling problems, or very minor/infrequent discharge limit violations were managed through phone calls and educational meetings with the user. We have achieved good cooperation with the affected businesses.

## **9. RESOURCE SUMMARY**

Form 9 at the end of this report is a brief resource summary for the Pretreatment Program in 2024. Funding for the pretreatment program comes from the total sewer operating budget. Costs for pretreatment program activities are factored into sewer rates applied to specific user categories. Adequate funds were available to fully implement all program activities in 2024. The pretreatment program currently employs 3 full-time laboratory/pretreatment technicians and a laboratory supervisor with split responsibilities between the laboratory and pretreatment programs.

Besides salaries, the major single operating cost for 2024 was the analysis of treatment plant influent, effluent, and biosolids samples and the analysis of industrial monitoring samples by contracted laboratories. Vehicle operating costs, as well as training and development, were the other major expenses in 2024.

The pretreatment program has conducted a review of its enforcement processes in collaboration with the Sewer Code Enforcement Program. Through this process, the programs have delineated enforcement roles between the two groups. Additional personnel needs will be assessed in 2025.

## Appendix A.

### APPLICABLE DISCHARGE LIMITS

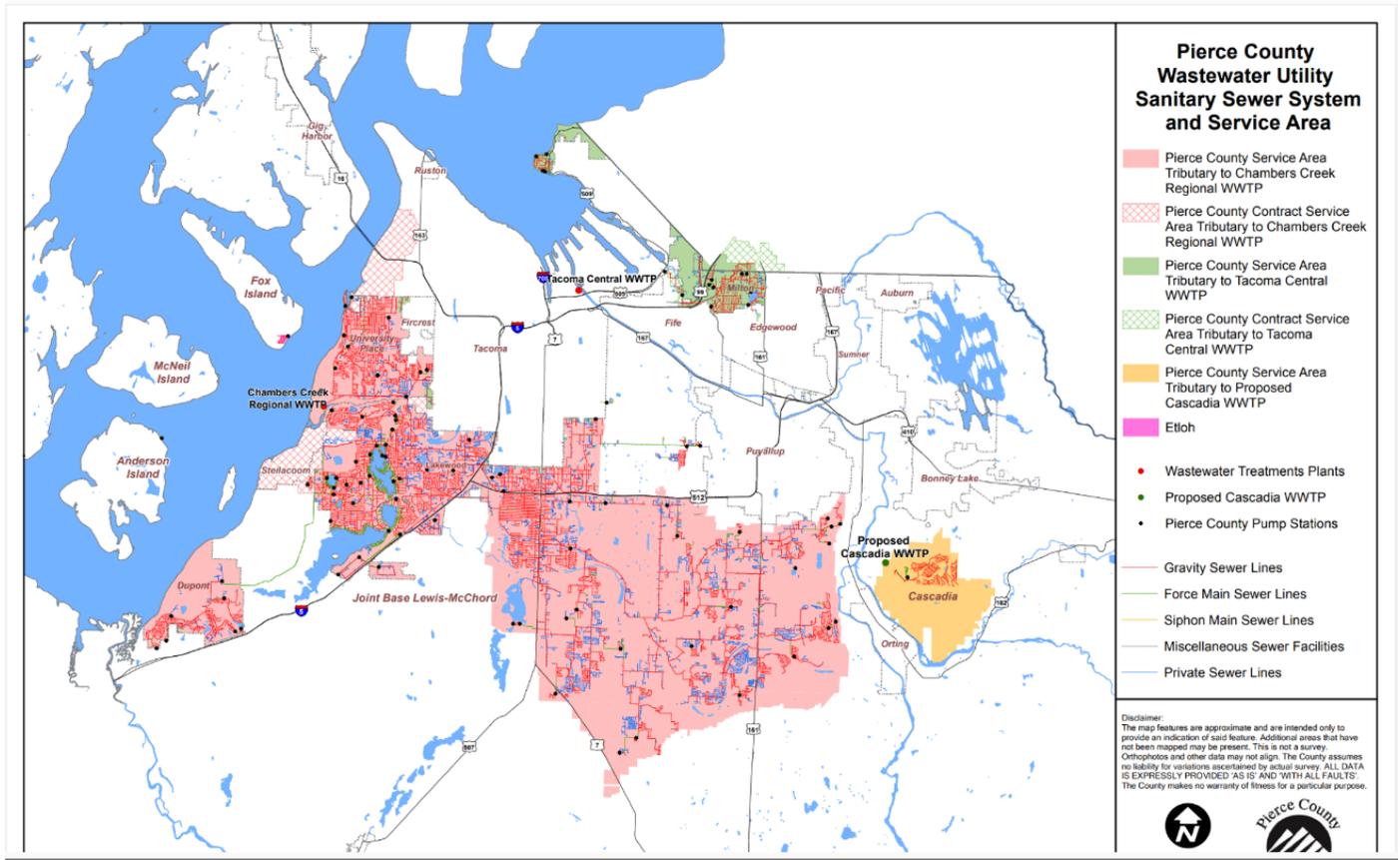
THE FOLLOWING ARE THE LOCAL LIMITS THAT MUST BE MET BY ALL INDUSTRIES DISCHARGING TO PIERCE COUNTY SEWERS:

<u>Constituent</u>	<u>24 Hour Average Concentration (mg/L)</u>
Arsenic	0.23
Cadmium	0.11
Chromium (total)	1.00
Copper	1.00
Lead	0.40
Mercury	0.05
Nickel	1.00
Selenium	1.45
Silver	2.00
Zinc	2.00
Cyanide (amenable)	0.20
Cyanide (total)	0.64
Fats, Oil & Grease (FOG)	100
Total Petroleum Hydrocarbons (TPH)	50
Phenol	10

## Appendix B. List of Pretreatment Reviews

Project Name	Review Number
Mauritius Cafe	5764769
Indigo Urgent Care - Surprise Lake	5764773
Rose Spa	5767807
Bloom Thai Cuisine	5770754
Hop N Drops Restaurant	5770855
Canyon East Logistics- Lollicup	5771134
Bloom Thai Cuisine	5771745
Steph's Pizza	5772225
Lady Bug Espresso	5772227
Super Chix	5772912
Amazon Go	5773361
PC Eductor Decant Facility	5773365
Mis Tres Amigos	5776094
Devco Apartment Lakewood DCPT 969124	5776197
McDonald's	5777508
Chambers Bay Distillery	5777952
Quick Quack Car Wash	5778498
Aero Precision LLC - Building 28	5778919
Glacier Car Wash	5780559
South Sound Veterinary Imaging	5786306
Nothing Bundt Cakes	5791663
Legend Jujitsu	5795976
Clover Park School District -Tillicum Elementary Schoo	5796888
Spanaway Middle School - Bethel SD	5804266
Take 5 Oil Change	5805308
Glacier Car Wash	5810766
McDonalds	5811568
Emerson Lake Business Park	5812442
Parkland Pacific Dental	5818095
Tommy's Car Wash	5819857
Navistar	5821569
Glacier Car Wash	5822417
Five Guys	5822418
Five Guys	5822419
City of University Place Public Works - Decant Facility	5824167
Valvoline Instant Oil Change	5825000
Vacant	5833250
CheckMate	5833251
Smallfoot Kids Dental	5833256
Smallfoot Kids Dental	5833257
RESURRECTION PRESBYTERIAN CHURCH	5834451

# Appendix C. Pierce County Sewer Service Area



## Appendix D. Dept. of Ecology Forms

**Dept. of Ecology Forms Cover Sheet  
2024 Pretreatment Annual Report  
Pierce County Industrial Pretreatment Program**

NPDES Permit Holder or Sewer Authority Name: **Pierce County Planning and Public Works**

Report Date: **February 26, 2025**

Period covered by this data: **1/1/2024 To: 12/31/2024**

Name of Wastewater Treatment Plant  
**Chambers Creek Regional WWTP**

NPDES Permit Number  
**WA 0039624**

- Form 3:** Priority Pollutant Data
- Form 4:** Local Limit Calculations and Data
- Form 5:** Significant Industrial User Update
- Form 6:** Significant Industrial User Summary and Compliance Comparison
- Form 7:** Significant Industrial User 2024 Data Summary
- Form 8:** Enforcement Summary - SIU
- Form 9:** Resource Summary
- Form 10:** Summary and Acknowledgement

Person to contact concerning information contained in this report:

River Wan  
Laboratory Supervisor

10311 Chambers Creek Rd. W  
University Place, WA 98467-1040

(253) 798-3002

### FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-01

Client Identification: Raw Influent Grab

Sampling Date: 07/31/24 08:47

#### Metals Extraction

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Mercury (Trace)	0.106	ug/L		0.000500	EPA 1631	AL	08/08/2024

#### VOC by EPA Method 624

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Vinyl Chloride	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
Total Acrolein	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
Total 2-Chloroethylvinyl ether	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
<i>Surrogate: Toluene-d8</i>	<i>100%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/07/2024</i>
Total Chloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Vinyl Chloride	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Chloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Trichlorofluoromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1-Dichloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Acetone	231	ug/L		5.00	EPA 624.1	NN	08/05/2024
Total Carbon disulfide	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Methyl Iodide	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Methylene Chloride	6.55	ug/L		3.00	EPA 624.1	NN	08/05/2024
Total trans-1,2-Dichloroethene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Acrylonitrile	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1-Dichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Vinyl Acetate	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total cis-1,2-Dichloroethene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromochloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 2-Butanone	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Chloroform	1.02	ug/L		1.00	EPA 624.1	NN	08/05/2024
Total 1,1,1-Trichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Carbon Tetrachloride	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2,3-Trichloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Benzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024

### FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-01

Client Identification: Raw Influent Grab

Sampling Date: 07/31/24 08:47

#### VOC by EPA Method 624 (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total 1,2-Dichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Trichloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dichloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Dibromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromodichloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total cis-1,3-Dichloropropene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 4-Methyl-2-pentanone (MIBK)	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Toluene	2.11	ug/L		1.00	EPA 624.1	NN	08/05/2024
Total trans-1,3-Dichloropropene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,2-Trichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Tetrachloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 2-Hexanone	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Chlorodibromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dibromoethane (EDB)	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Chlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Ethylbenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,1,2-Tetrachloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total m,p Xylenes	ND	ug/L	U	2.00	EPA 624.1	NN	08/05/2024
Total o-Xylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Styrene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromoform	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,2,2-Tetrachloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total trans-1,4-Dichloro-2-butene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,3-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,4-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dibromo-3-chloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Surrogate: 1,2-Dichloroethane-d4	103%	70-130%				NN	08/05/2024
Surrogate: Toluene-d8	106%	70-130%				NN	08/05/2024
Surrogate: 4-Bromofluorobenzene	98%	70-130%				NN	08/05/2024

AMTEST Identification Number: A24H0025-01

Client Identification: Raw Influent Grab

Sampling Date: 07/31/24 08:47

#### Conventional Chemistry Parameters by APHA/EPA Methods

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Cyanide	ND	mg/L		0.005	SM 4500CN-E_2011	EZ	08/13/2024
Oil and Grease (HEM)	13.1	mg/L		5.00	EPA 1664A_1_1999	HV	08/08/2024
TPH (Polar)	12.4	mg/L		5.00	EPA 1664A_1_1999	HV	08/08/2024
TPH (Non-Polar)	ND	mg/L	U	5.00	EPA 1664A_1_1999	HV	08/08/2024
Total Phenol	0.11	mg/L		0.03	EPA 420.4_1_1993	LF	08/09/2024

## FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-09  
 Client Identification: Raw Influent comp  
 Sampling Date: 07/31/24 08:05

### Metals by EPA 200 Series Methods

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Silver	0.308	ug/L		0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Arsenic	2.165	ug/L		0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Beryllium	ND	ug/L	U	0.300	EPA 200.8_5.4_1994	AE	08/09/2024
Total Cadmium	0.115	ug/L		0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Chromium	8.894	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024
Total Copper	43.75	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024
Total Nickel	3.736	ug/L		0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Lead	1.152	ug/L		0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Antimony	1.040	ug/L		0.300	EPA 200.8_5.4_1994	AE	08/09/2024
Total Selenium	1.522	ug/L		1.000	EPA 200.8_5.4_1994	AE	08/09/2024
Total Thallium	ND	ug/L	U	0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Zinc	125.4	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024

### Organochlorine Pesticides and PCBs by EPA Method 608

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Alpha-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1016	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Aroclor 1221	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Lindane (γ-BHC)	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1232	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Beta-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1242	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Heptachlor	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1248	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Delta-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aldrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1254	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Aroclor 1260	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024
Heptachlor epoxide	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1268	ND	ug/L	U	0.239	EPA 608.3	NN	08/05/2024

## FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-09

Client Identification: Raw Influent comp

Sampling Date: 07/31/24 08:05

### Organochlorine Pesticides and PCBs by EPA Method 608 (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Endosulfan I	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDE	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Dieldrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endosulfan II	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDD	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endrin aldehyde	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDT	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endosulfan sulfate	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Methoxychlor	ND	ug/L	U	0.048	EPA 608.3	NN	08/15/2024
Toxaphene	ND	ug/L	U	0.120	EPA 608.3	NN	08/15/2024
Chlordane	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Surrogate: Decachlorobiphenyl	116%	0-200%				NN	08/05/2024
Surrogate: Tetrachloro-m-xylene	115%	0-200%				NN	08/05/2024

### SEMIVOLATILES BY GC/MS

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodimethylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pyridine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Aniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Phenol	16.5	ug/L		2.00	EPA 625.1	NN	08/12/2024
Bis(2-chloroethyl)ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Chlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,3-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,4-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzyl alcohol	27.3	ug/L		2.00	EPA 625.1	NN	08/12/2024
2-Methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Bis(2-Chloroisopropyl)ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Methylphenol	56.0	ug/L		2.00	EPA 625.1	NN	08/12/2024

## FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-09

Client Identification: Raw Influent comp

Sampling Date: 07/31/24 08:05

### SEMIVOLATILES BY GC/MS (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodi-n-propylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachloroethane	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Nitrobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Isophorone	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Nitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dimethylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzoic Acid	364	ug/L		2.00	EPA 625.1	NN	08/12/2024
Bis(2-chloroethoxy)methane	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2,4-Trichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Naphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chloroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorobutadiene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chloro-3-methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Methylnaphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorocyclopentadiene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4,6-Trichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4,5-Trichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Chloronaphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dimethylphthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Acenaphthylene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,6-Dinitrotoluene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
3-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Acenaphthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dinitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dibenzofuran	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Nitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dinitrotoluene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Fluorene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024

# FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-09

Client Identification: Raw Influent comp

Sampling Date: 07/31/24 08:05

## SEMIVOLATILES BY GC/MS (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Diethyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chlorophenyl phenyl ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4,6-Dinitro-2-methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
N-Nitrosodiphenylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2-Diphenylhydrazine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Bromophenyl phenyl ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pentachlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Phenanthrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Carbazole	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Di-n-butyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzidine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Butyl benzyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(a)anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Chrysene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
3,3'-Dichlorobenzidine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Bis(2-ethylhexyl)phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Di-n-octyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(b)fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(k)fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(a)pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Indeno(1,2,3-cd)pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dibenz(a,h)anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(g,h,i)perylene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Surrogate: 2-Fluorophenol	80%	0-200%				NN	08/12/2024
Surrogate: 2-Chlorophenol-D4	86%	40-130%				NN	08/12/2024

AMTEST Identification Number: A24H0025-09

Client Identification: Raw Influent comp

Sampling Date: 07/31/24 08:05

## SEMIVOLATILES BY GC/MS (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Surrogate: Phenol-D6	33%	40-130%				NN	08/12/2024
Surrogate: Nitrobenzene-D5	115%	40-130%				NN	08/12/2024
Surrogate: 2-Fluorobiphenyl	110%	40-130%				NN	08/12/2024
Surrogate: 2,4,6-Tribromophenol	80%	40-130%				NN	08/12/2024
Surrogate: Terphenyl-D14	126%	40-130%				NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-02**  
**Client Identification: Final Effluent Grab**  
**Sampling Date: 07/31/24 09:05**

**Metals Extraction**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Mercury (Trace)	0.00340	ug/L		0.000500	EPA 1631	AL	08/08/2024

**VOC by EPA Method 624**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Vinyl Chloride	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
Total Acrolein	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
Total 2-Chloroethylvinyl ether	ND	ug/L	U	0.100	EPA 624.1	NN	08/07/2024
<i>Surrogate: Toluene-d8</i>	<i>102%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/07/2024</i>
Total Chloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Vinyl Chloride	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Chloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Trichlorofluoromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1-Dichloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Acetone	16.2	ug/L		5.00	EPA 624.1	NN	08/05/2024
Total Carbon disulfide	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Methyl Iodide	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Methylene Chloride	5.77	ug/L		3.00	EPA 624.1	NN	08/05/2024
Total trans-1,2-Dichloroethene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Acrylonitrile	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1-Dichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Vinyl Acetate	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total cis-1,2-Dichloroethene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromochloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 2-Butanone	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Chloroform	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,1-Trichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Carbon Tetrachloride	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2,3-Trichloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Benzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-02**  
**Client Identification: Final Effluent Grab**  
**Sampling Date: 07/31/24 09:05**

**VOC by EPA Method 624 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total 1,2-Dichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Trichloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dichloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Dibromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromodichloromethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total cis-1,3-Dichloropropene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 4-Methyl-2-pentanone (MIBK)	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Toluene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total trans-1,3-Dichloropropene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,2-Trichloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Tetrachloroethylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 2-Hexanone	ND	ug/L	U	5.00	EPA 624.1	NN	08/05/2024
Total Chlorodibromomethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dibromoethane (EDB)	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Chlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Ethylbenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,1,2-Tetrachloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total m,p Xylenes	ND	ug/L	U	2.00	EPA 624.1	NN	08/05/2024
Total o-Xylene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Styrene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total Bromoform	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,1,2,2-Tetrachloroethane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total trans-1,4-Dichloro-2-butene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,3-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,4-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dichlorobenzene	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
Total 1,2-Dibromo-3-chloropropane	ND	ug/L	U	1.00	EPA 624.1	NN	08/05/2024
<i>Surrogate: 1,2-Dichloroethane-d4</i>	<i>98%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: Toluene-d8</i>	<i>114%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: 4-Bromofluorobenzene</i>	<i>95%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/05/2024</i>

**AMTEST Identification Number: A24H0025-02**  
**Client Identification: Final Effluent Grab**  
**Sampling Date: 07/31/24 09:05**

**Conventional Chemistry Parameters by APHA/EPA Methods**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Cyanide	ND	mg/L		0.006	SM 4500CN-E_2011	EZ	08/13/2024
Oil and Grease (HEM)	ND	mg/L	U	5.00	EPA 1664A_1_1999	HV	08/08/2024
TPH (Polar)	ND	mg/L	U	5.00	EPA 1664A_1_1999	HV	08/08/2024
TPH (Non-Polar)	ND	mg/L	U	5.00	EPA 1664A_1_1999	HV	08/08/2024
Total Phenol	ND	mg/L	U	0.03	EPA 420.4_1_1993	LF	08/09/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-10**

**Client Identification: Final Effluent Comp**

**Sampling Date: 07/31/24 08:09**

**Metals by EPA 200 Series Methods**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Silver	ND	ug/L	U	0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Arsenic	1.877	ug/L		0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Beryllium	ND	ug/L	U	0.300	EPA 200.8_5.4_1994	AE	08/09/2024
Total Cadmium	ND	ug/L	U	0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Chromium	2.684	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024
Total Copper	4.220	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024
Total Nickel	2.461	ug/L		0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Lead	ND	ug/L	U	0.200	EPA 200.8_5.4_1994	AE	08/09/2024
Total Antimony	0.609	ug/L		0.300	EPA 200.8_5.4_1994	AE	08/09/2024
Total Selenium	ND	ug/L	U	1.000	EPA 200.8_5.4_1994	AE	08/09/2024
Total Thallium	ND	ug/L	U	0.100	EPA 200.8_5.4_1994	AE	08/09/2024
Total Zinc	40.69	ug/L		0.500	EPA 200.8_5.4_1994	AE	08/09/2024

**Organochlorine Pesticides and PCBs by EPA Method 608**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Alpha-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1016	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Aroclor 1221	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Lindane (γ-BHC)	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1232	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Beta-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1242	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Heptachlor	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1248	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Delta-BHC	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aldrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1254	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Aroclor 1260	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024
Heptachlor epoxide	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Aroclor 1268	ND	ug/L	U	0.240	EPA 608.3	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-10**  
**Client Identification: Final Effluent Comp**  
**Sampling Date: 07/31/24 08:09**

**Organochlorine Pesticides and PCBs by EPA Method 608 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Endosulfan I	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDE	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Dieldrin	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endosulfan II	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDD	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endrin aldehyde	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
DDT	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Endosulfan sulfate	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
Methoxychlor	ND	ug/L	U	0.048	EPA 608.3	NN	08/15/2024
Toxaphene	ND	ug/L	U	0.120	EPA 608.3	NN	08/15/2024
Chlordane	ND	ug/L	U	0.014	EPA 608.3	NN	08/15/2024
<i>Surrogate: Decachlorobiphenyl</i>	<i>119%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: Tetrachloro-m-xylene</i>	<i>120%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>

**SEMIVOLATILES BY GC/MS**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodimethylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pyridine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Aniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Phenol	9.83	ug/L		2.00	EPA 625.1	NN	08/12/2024
Bis(2-chloroethyl)ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Chlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,3-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,4-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2-Dichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzyl alcohol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Bis(2-Chloroisopropyl)ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024

## FORM 3 Priority Pollutant Data

AMTEST Identification Number: A24H0025-10

Client Identification: Final Effluent Comp

Sampling Date: 07/31/24 08:09

### SEMIVOLATILES BY GC/MS (Continued)

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodi-n-propylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachloroethane	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Nitrobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Isophorone	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Nitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dimethylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzoic Acid	4.31	ug/L		2.00	EPA 625.1	NN	08/12/2024
Bis(2-chloroethoxy)methane	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2,4-Trichlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Naphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chloroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorobutadiene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chloro-3-methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Methylnaphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorocyclopentadiene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4,6-Trichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4,5-Trichlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Chloronaphthalene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dimethylphthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Acenaphthylene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,6-Dinitrotoluene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
3-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Acenaphthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dinitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dibenzofuran	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Nitrophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
2,4-Dinitrotoluene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Fluorene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-10**

**Client Identification: Final Effluent Comp**

**Sampling Date: 07/31/24 08:09**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Diethyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Chlorophenyl phenyl ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Nitroaniline	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4,6-Dinitro-2-methylphenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
N-Nitrosodiphenylamine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
1,2-Diphenylhydrazine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
4-Bromophenyl phenyl ether	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Hexachlorobenzene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pentachlorophenol	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Phenanthrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Carbazole	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Di-n-butyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzdine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Butyl benzyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(a)anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Chrysene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
3,3'-Dichlorobenzidine	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Bis(2-ethylhexyl)phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Di-n-octyl phthalate	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(b)fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(k)fluoranthene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(a)pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Indeno(1,2,3-cd)pyrene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Dibenz(a,h)anthracene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
Benzo(g,h,i)perylene	ND	ug/L	U	2.00	EPA 625.1	NN	08/12/2024
<i>Surrogate: 2-Fluorophenol</i>	74%	0-200%				NN	08/12/2024
<i>Surrogate: 2-Chlorophenol-D4</i>	72%	40-130%				NN	08/12/2024

**AMTEST Identification Number: A24H0025-10**

**Client Identification: Final Effluent Comp**

**Sampling Date: 07/31/24 08:09**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
<i>Surrogate: Phenol-D6</i>	69%	40-130%				NN	08/12/2024
<i>Surrogate: Nitrobenzene-D5</i>	97%	40-130%				NN	08/12/2024
<i>Surrogate: 2-Fluorobiphenyl</i>	104%	40-130%				NN	08/12/2024
<i>Surrogate: 2,4,6-Tribromophenol</i>	82%	40-130%				NN	08/12/2024
<i>Surrogate: Terphenyl-D14</i>	115%	40-130%				NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**Metals by EPA 6000/7000 Series Methods**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Silver	1.89	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024
Total Arsenic	3.91	mg/kg dry		0.525	EPA 6010D	AE	08/06/2024
Total Beryllium	ND	mg/kg dry	U	0.525	EPA 6010D	AE	08/06/2024
Total Cadmium	0.847	mg/kg dry		0.525	EPA 6010D	AE	08/06/2024
Total Chromium	47.8	mg/kg dry		1.57	EPA 6010D	AE	08/06/2024
Total Copper	263	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024
Total Nickel	15.2	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024
Total Lead	7.95	mg/kg dry		2.62	EPA 6010D	AE	08/06/2024
Total Antimony	2.96	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024
Total Selenium	8.32	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024
Total Thallium	ND	mg/kg dry	U	1.05	EPA 6010D	AE	08/06/2024
Total Zinc	593	mg/kg dry		1.05	EPA 6010D	AE	08/06/2024

**Organochlorine Pesticides and PCBs by EPA Method 608**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Alpha-BHC	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Lindane (γ-BHC)	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Beta-BHC	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Heptachlor	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Delta-BHC	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Aldrin	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Heptachlor epoxide	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Endosulfan I	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
DDE	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Endrin	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Dieldrin	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
DDD	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Endrin aldehyde	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
DDT	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Endosulfan sulfate	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**Organochlorine Pesticides and PCBs by EPA Method 608 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Methoxychlor	ND	ug/kg dry	U	3.67	EPA 608.3	NN	08/15/2024
Aroclor 1016	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Toxaphene	ND	ug/kg dry	U	9.18	EPA 608.3	NN	08/15/2024
Aroclor 1221	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Aroclor 1232	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Chlordane	ND	ug/kg dry	U	1.10	EPA 608.3	NN	08/15/2024
Aroclor 1242	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Aroclor 1248	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Aroclor 1254	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
Aroclor 1260	ND	ug/kg dry	U	18.4	EPA 608.3	NN	08/12/2024
<i>Surrogate: Tetrachloro-m-xylene</i>	<i>216%</i>	<i>40-140%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: Decachlorobiphenyl</i>	<i>89%</i>	<i>40-140%</i>				<i>NN</i>	<i>08/12/2024</i>

**VOC by EPA Method 624**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Chloromethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Vinyl Chloride	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Bromomethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Chloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Trichlorofluoromethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1-Dichloroethylene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Acetone	42,700	ug/kg wet	E	5.46	EPA 8260D	NN	08/05/2024
Total Carbon disulfide	396	ug/kg wet	E	1.09	EPA 8260D	NN	08/05/2024
Total Methyl Iodide	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Methylene Chloride	61.6	ug/kg wet		3.28	EPA 8260D	NN	08/05/2024
Total trans-1,2-Dichloroethene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Acrylonitrile	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1-Dichloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Vinyl Acetate	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total cis-1,2-Dichloroethene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**

**Client Identification: SoundGRO Pellet Grab**

**Sampling Date: 07/31/24 09:38**

**VOC by EPA Method 624 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Bromochloromethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 2-Butanone	14,500	ug/kg wet	E	5.46	EPA 8260D	NN	08/05/2024
Total Chloroform	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1,1-Trichloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Carbon Tetrachloride	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,2,3-Trichloropropane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Benzene	13.5	ug/kg wet		1.09	EPA 8260D	NN	08/05/2024
Total 1,2-Dichloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Trichloroethylene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,2-Dichloropropane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Dibromomethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Bromodichloromethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total cis-1,3-Dichloropropene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 4-Methyl-2-pentanone (MIBK)	ND	ug/kg wet	U	5.46	EPA 8260D	NN	08/05/2024
Total Toluene	6.87	ug/kg wet		1.09	EPA 8260D	NN	08/05/2024
Total trans-1,3-Dichloropropene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1,2-Trichloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Tetrachloroethylene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 2-Hexanone	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Chlorodibromomethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,2-Dibromoethane (EDB)	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Chlorobenzene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Ethylbenzene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1,1,2-Tetrachloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total m,p Xylenes	3.57	ug/kg wet		2.18	EPA 8260D	NN	08/05/2024
Total o-Xylene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Styrene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total Bromoform	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,1,2,2-Tetrachloroethane	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total trans-1,4-Dichloro-2-butene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**VOC by EPA Method 624 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total 1,3-Dichlorobenzene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,4-Dichlorobenzene	3.24	ug/kg wet		1.09	EPA 8260D	NN	08/05/2024
Total 1,2-Dichlorobenzene	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
Total 1,2-Dibromo-3-chloropropane (DBCP)	ND	ug/kg wet	U	1.09	EPA 8260D	NN	08/05/2024
<i>Surrogate: 1,2-Dichloroethane-d4</i>	<i>133%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: Toluene-d8</i>	<i>84%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: 4-Bromofluorobenzene</i>	<i>90%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>

**SEMIVOLATILES BY GC/MS**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodimethylamine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Pyridine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Aniline	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Phenol	2,650	ug/kg dry		1,470	EPA 8270D	NN	08/12/2024
Bis(2-chloroethyl)ether	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Chlorophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
1,3-Dichlorobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
1,4-Dichlorobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
1,2-Dichlorobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzyl alcohol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Methylphenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Bis(2-Chloroisopropyl)ether	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Methylphenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
N-Nitrosodi-n-propylamine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Hexachloroethane	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Nitrobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Isophorone	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Nitrophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4-Dimethylphenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzoic Acid	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Bis(2-chloroethoxy)methane	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4-Dichlorophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
1,2,4-Trichlorobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Naphthalene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Chloroaniline	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Hexachlorobutadiene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Chloro-3-methylphenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Methylnaphthalene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Hexachlorocyclopentadiene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4,6-Trichlorophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4,5-Trichlorophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Chloronaphthalene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2-Nitroaniline	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Dimethylphthalate	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Acenaphthylene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,6-Dinitrotoluene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
3-Nitroaniline	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Acenaphthene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4-Dinitrophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Dibenzofuran	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Nitrophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
2,4-Dinitrotoluene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Fluorene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Diethyl phthalate	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Chlorophenyl phenyl ether	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Nitroaniline	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4,6-Dinitro-2-methylphenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
N-Nitrosodiphenylamine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
1,2-Diphenylhydrazine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
4-Bromophenyl phenyl ether	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Hexachlorobenzene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Pentachlorophenol	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Phenanthrene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Anthracene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Carbazole	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Di-n-butyl phthalate	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Fluoranthene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzidine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Pyrene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Butyl benzyl phthalate	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzo(a)anthracene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Chrysene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
3,3'-Dichlorobenzidine	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Bis(2-ethylhexyl)phthalate	26,300	ug/kg dry		1,470	EPA 8270D	NN	08/12/2024
Di-n-octyl phthalate	4,200	ug/kg dry		1,470	EPA 8270D	NN	08/12/2024
Benzo(b)fluoranthene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzo(k)fluoranthene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzo(a)pyrene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Indeno(1,2,3-cd)pyrene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Dibenz(a,h)anthracene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
Benzo(g,h,i)perylene	ND	ug/kg dry	U	1,470	EPA 8270D	NN	08/12/2024
<i>Surrogate: 2-Fluorophenol</i>	<i>34%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: 2-Chlorophenol-D4</i>	<i>54%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: Phenol-D6</i>	<i>55%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: Nitrobenzene-D5</i>	<i>71%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: 2-Fluorobiphenyl</i>	<i>92%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: 2,4,6-Tribromophenol</i>	<i>61%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: Terphenyl-D14</i>	<i>107%</i>	<i>40-130%</i>				<i>NN</i>	<i>08/12/2024</i>

**Conventional Chemistry Parameters by APHA/EPA Methods**

**AMTEST Identification Number: A24H0025-14**  
**Client Identification: SoundGRO Pellet Grab**  
**Sampling Date: 07/31/24 09:38**

**Conventional Chemistry Parameters by APHA/EPA Methods (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
% Solids	90.8	%			SM 2540G_2011	HV	09/04/2024
Total Cyanide	1.22	mg/kg dry		0.075	SM 4500CN-E_2011	EZ	08/09/2024
Mercury	1,740	ug/kg dry		6.67	EPA 7471 B	EZ	08/06/2024
Total Phenol	15.7	mg/kg dry		0.1	EPA 420.4_1_1993	LF	08/09/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**  
**Client Identification: Class B Cake Grab**  
**Sampling Date: 07/31/24 09:31**

**Metals by EPA 6000/7000 Series Methods**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Silver	ND	mg/kg dry	U	4.63	EPA 6010D	AE	08/06/2024
Total Arsenic	4.49	mg/kg dry		2.32	EPA 6010D	AE	08/06/2024
Total Beryllium	ND	mg/kg dry	U	2.32	EPA 6010D	AE	08/06/2024
Total Cadmium	ND	mg/kg dry	U	2.32	EPA 6010D	AE	08/06/2024
Total Chromium	53.4	mg/kg dry		6.95	EPA 6010D	AE	08/06/2024
Total Copper	291	mg/kg dry		4.63	EPA 6010D	AE	08/06/2024
Total Nickel	ND	mg/kg dry	U	4.63	EPA 6010D	AE	08/06/2024
Total Lead	ND	mg/kg dry	U	11.6	EPA 6010D	AE	08/06/2024
Total Antimony	ND	mg/kg dry	U	4.63	EPA 6010D	AE	08/06/2024
Total Selenium	8.67	mg/kg dry		4.63	EPA 6010D	AE	08/06/2024
Total Thallium	ND	mg/kg dry	U	4.63	EPA 6010D	AE	08/06/2024
Total Zinc	694	mg/kg dry		4.63	EPA 6010D	AE	08/06/2024

**Organochlorine Pesticides and PCBs by EPA Method 608**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Alpha-BHC	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Lindane (γ-BHC)	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Beta-BHC	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Heptachlor	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Delta-BHC	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Aldrin	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Heptachlor epoxide	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Endosulfan I	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
DDE	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Endrin	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Dieldrin	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
DDD	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Endrin aldehyde	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
DDT	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Endosulfan sulfate	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**

**Client Identification: Class B Cake Grab**

**Sampling Date: 07/31/24 09:31**

**Organochlorine Pesticides and PCBs by EPA Method 608 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Methoxychlor	ND	ug/kg dry	U	16.6	EPA 608.3	NN	08/15/2024
Aroclor 1016	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Toxaphene	ND	ug/kg dry	U	41.4	EPA 608.3	NN	08/15/2024
Aroclor 1221	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Aroclor 1232	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Chlordane	ND	ug/kg dry	U	4.97	EPA 608.3	NN	08/15/2024
Aroclor 1242	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Aroclor 1248	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Aroclor 1254	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
Aroclor 1260	ND	ug/kg dry	U	82.9	EPA 608.3	NN	08/12/2024
<i>Surrogate: Tetrachloro-m-xylene</i>	<i>116%</i>	<i>40-140%</i>				<i>NN</i>	<i>08/12/2024</i>
<i>Surrogate: Decachlorobiphenyl</i>	<i>106%</i>	<i>40-140%</i>				<i>NN</i>	<i>08/12/2024</i>

**VOC by EPA Method 624**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Chloromethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Vinyl Chloride	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Bromomethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Chloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Trichlorofluoromethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1-Dichloroethylene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Acetone	627	ug/kg wet	E	5.95	EPA 8260D	NN	08/05/2024
Total Carbon disulfide	10.8	ug/kg wet		1.19	EPA 8260D	NN	08/05/2024
Total Methyl Iodide	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Methylene Chloride	13.1	ug/kg wet		3.57	EPA 8260D	NN	08/05/2024
Total trans-1,2-Dichloroethene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Acrylonitrile	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1-Dichloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Vinyl Acetate	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total cis-1,2-Dichloroethene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**  
**Client Identification: Class B Cake Grab**  
**Sampling Date: 07/31/24 09:31**

**VOC by EPA Method 624 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Bromochloromethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 2-Butanone	227	ug/kg wet	E	5.95	EPA 8260D	NN	08/05/2024
Total Chloroform	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1,1-Trichloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Carbon Tetrachloride	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,2,3-Trichloropropane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Benzene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,2-Dichloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Trichloroethylene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,2-Dichloropropane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Dibromomethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Bromodichloromethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total cis-1,3-Dichloropropene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 4-Methyl-2-pentanone (MIBK)	ND	ug/kg wet	U	5.95	EPA 8260D	NN	08/05/2024
Total Toluene	15.7	ug/kg wet		1.19	EPA 8260D	NN	08/05/2024
Total trans-1,3-Dichloropropene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1,2-Trichloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Tetrachloroethylene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 2-Hexanone	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Chlorodibromomethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,2-Dibromoethane (EDB)	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Chlorobenzene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Ethylbenzene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1,1,2-Tetrachloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total m,p Xylenes	ND	ug/kg wet	U	2.38	EPA 8260D	NN	08/05/2024
Total o-Xylene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Styrene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total Bromoform	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,1,2,2-Tetrachloroethane	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total trans-1,4-Dichloro-2-butene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**

**Client Identification: Class B Cake Grab**

**Sampling Date: 07/31/24 09:31**

**VOC by EPA Method 624 (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total 1,3-Dichlorobenzene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,4-Dichlorobenzene	5.25	ug/kg wet		1.19	EPA 8260D	NN	08/05/2024
Total 1,2-Dichlorobenzene	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
Total 1,2-Dibromo-3-chloropropane (DBCP)	ND	ug/kg wet	U	1.19	EPA 8260D	NN	08/05/2024
<i>Surrogate: 1,2-Dichloroethane-d4</i>	<i>94%</i>	<i>70-130%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: Toluene-d8</i>	<i>157%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>
<i>Surrogate: 4-Bromofluorobenzene</i>	<i>68%</i>	<i>0-200%</i>				<i>NN</i>	<i>08/05/2024</i>

**SEMIVOLATILES BY GC/MS**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
N-Nitrosodimethylamine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Pyridine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Aniline	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Phenol	130,000	ug/kg dry		6,750	EPA 8270D	NN	08/12/2024
Bis(2-chloroethyl)ether	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Chlorophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
1,3-Dichlorobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
1,4-Dichlorobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
1,2-Dichlorobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzyl alcohol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Methylphenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Bis(2-Chloroisopropyl)ether	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Methylphenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
N-Nitrosodi-n-propylamine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Hexachloroethane	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Nitrobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Isophorone	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Nitrophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4-Dimethylphenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzoic Acid	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**  
**Client Identification: Class B Cake Grab**  
**Sampling Date: 07/31/24 09:31**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Bis(2-chloroethoxy)methane	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4-Dichlorophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
1,2,4-Trichlorobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Naphthalene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Chloroaniline	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Hexachlorobutadiene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Chloro-3-methylphenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Methylnaphthalene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Hexachlorocyclopentadiene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4,6-Trichlorophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4,5-Trichlorophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Chloronaphthalene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2-Nitroaniline	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Dimethylphthalate	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Acenaphthylene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,6-Dinitrotoluene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
3-Nitroaniline	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Acenaphthene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4-Dinitrophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Dibenzofuran	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Nitrophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
2,4-Dinitrotoluene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Fluorene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Diethyl phthalate	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Chlorophenyl phenyl ether	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Nitroaniline	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4,6-Dinitro-2-methylphenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
N-Nitrosodiphenylamine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
1,2-Diphenylhydrazine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
4-Bromophenyl phenyl ether	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024

**FORM 3 Priority Pollutant Data**

**AMTEST Identification Number: A24H0025-15**  
**Client Identification: Class B Cake Grab**  
**Sampling Date: 07/31/24 09:31**

**SEMIVOLATILES BY GC/MS (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Hexachlorobenzene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Pentachlorophenol	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Phenanthrene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Anthracene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Carbazole	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Di-n-butyl phthalate	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Fluoranthene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzidine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Pyrene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Butyl benzyl phthalate	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzo(a)anthracene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Chrysene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
3,3'-Dichlorobenzidine	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Bis(2-ethylhexyl)phthalate	630,000	ug/kg dry		6,750	EPA 8270D	NN	08/12/2024
Di-n-octyl phthalate	113,000	ug/kg dry		6,750	EPA 8270D	NN	08/12/2024
Benzo(b)fluoranthene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzo(k)fluoranthene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzo(a)pyrene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Indeno(1,2,3-cd)pyrene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Dibenz(a,h)anthracene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
Benzo(g,h,i)perylene	ND	ug/kg dry	U	6,750	EPA 8270D	NN	08/12/2024
<i>Surrogate: 2-Fluorophenol</i>	71%	40-130%				NN	08/12/2024
<i>Surrogate: 2-Chlorophenol-D4</i>	77%	40-130%				NN	08/12/2024
<i>Surrogate: Phenol-D6</i>	75%	40-130%				NN	08/12/2024
<i>Surrogate: Nitrobenzene-D5</i>	78%	40-130%				NN	08/12/2024
<i>Surrogate: 2-Fluorobiphenyl</i>	110%	40-130%				NN	08/12/2024
<i>Surrogate: 2,4,6-Tribromophenol</i>	83%	40-130%				NN	08/12/2024
<i>Surrogate: Terphenyl-D14</i>	221%	40-130%				NN	08/12/2024

**Conventional Chemistry Parameters by APHA/EPA Methods**

**AMTEST Identification Number: A24H0025-15**  
**Client Identification: Class B Cake Grab**  
**Sampling Date: 07/31/24 09:31**

**Conventional Chemistry Parameters by APHA/EPA Methods (Continued)**

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
% Solids	19.8	%			SM 2540G_2011	HV	09/04/2024
Total Cyanide	0.786	mg/kg dry		0.314	SM 4500CN-E_2011	EZ	08/09/2024
Mercury	1,630	ug/kg dry		18.7	EPA 7471 B	EZ	08/06/2024
Total Phenol	318	mg/kg dry		19.4	EPA 420.4_1_1993	LF	08/28/2024

**Chambers Creek WWTP 2024  
Pollutant Removal Percentages**

	Average Concentrations (µg/L)			% Removal	Headwork Loading (lbs)	MAIL	% of Headwork Loading to MAIL
	RAW		FE				
Silver	0.308	< 0.2		35.1%	0.041	6.3	
Arsenic	2.17	1.88		13.3%	0.285	1.5	19%
Cadmium	0.115	< 0.1		13.0%	0.015	1.9	0.8%
Chromium	8.894	2.684		69.8%	1.172	60.4	1.9%
Copper	43.75	4.2		90.4%	5.765	22.5	25.6%
Nickel	3.736	2.461		34.1%	0.492	13.5	3.6%
Lead	1.152	< 0.2		82.6%	0.152	5.4	2.8%
Antimony	1.0	0.609		41.4%	0.137		
Selenium	1.522	< 1		34.3%	0.201	38.6	0.5%
Thallium	< 0.1	< 0.1		0.0%	0.013		
Zinc	125.4	40.69		67.6%	16.524	47.4	34.9%
Mercury	0.10600	0.0034		96.8%	0.014	0.3	5.1%
Cyanide	< 0.005	< 0.006			0.001		
Total Phenol	0.11	< 0.03		72.7%	0.014	n/a	n/a

All priority pollutant results are from the 07/31/2024 sampling date.

FORM 4 Evaluation of Local Limits

Sampled: 7/31/2024

Average Concentrations (µg/L)					% Removal		Marine Water Quality Criteria		Human Health Criteria		Biosolid Application Criteria		Inhibition			AHLs (lbs)						MAHLs (lbs)	RES (lbs)	MAILs (lbs)	Local Limits				
RAW	PE	FE	RES	%R <sub>oe</sub>	%R <sub>osw</sub>	Acute (µg/L)	Chronic (µg/L)	Water + Organism (µg/L)	Organism Only (µg/L)	EQ (mg/kg)	Ceiling Concentration (mg/kg)	Activated Sludge (mg/L)	Anaerobic Digestion (mg/L)	Nitrification or Narrative (mg/L)	Acute	Chronic	Organism Only	Class A EQ	Biosolids Ceiling Concentration	Activated Sludge	Anaerobic Digestion Inhibition	Nitrification				Local Limits Applied to SIUs Only	Current Local Limits		
Silver	0.333	0.201	< 0.2	<	0.20	39.640%	39.940%	1.9							8.01						52.2			8.01	0.022	7.99	1.66	2.00	Silver
Arsenic	2.57	2.37	1.82	1.46	7.782%	29.339%	69	36	0.018	0.14	41	75	0.1	1.6	1.5	247	788	3.066	2.03	2.88	15.1	8.7	227	2.03	0.161	1.87	0.39	0.23	Arsenic
Cadmium	0.144	< 0.10	< 0.1	<	0.10	30.556%	30.556%	40	8.8		39	85	1.00	20	5.2	146	196		1.85	3.14	201	104.9	1043	1.85	0.011	1.84	0.38	0.11	Cadmium
Chromium	11.230	6.75	2.43	2.24	39.893%	78.362%															231.7	266	57.9	57.9	0.246	57.7	11.99	1.00	Chromium
Copper	55.84	32.8	4.132	17.92	41.279%	92.600%	4.8	3.1		1500	4300	1	40	0.05	164.3	648			23.5	52	237	69		23.49	1.971	21.52	4.47	1.00	Copper
Nickel	4.12	3.21	2.467	1.26	22.087%	40.121%	74	8.2	610	4600	420	420	1	10	0.25	313	212	118885	15.2	11.8	179	40	44.7	11.8	0.139	11.7	2.43	1.00	Nickel
Lead	1.801	< 0.85	< 0.2	0.73	52.860%	88.895%	210	8.1		300	840		340	0.5	4789	1129			4.89	10.7		613	148	4.89	0.080	4.81	1.00	0.40	Lead
Antimony	2.627	2.58	0.612	1.98	1.789%	76.703%		5.6	640								42514								0.218				Antimony
Selenium	2.5	< 1.703	< 1	<	1.86	30.688%	59.300%	290	71	170	4200	100	100		1804	2700	159696	2.45	1.90					1.90	0.205	1.70	0.35	1.45	Selenium
Thallium	< 0.1	< 0.1	< 0.1	<	0.10	0.000%	0.000%																		0.011				Thallium
Zinc	175.4	88.6	40.94	98.80	49.470%	76.659%	90	81	7400	26000	2800	7500	0.3	400	0.08	976	5370	1723833	53.0	110	82.7	836		53.0	10.9	42.09	8.75	2.00	Zinc
Mercury	0.10600	< 0.1000	0.0034	<	0.01	5.660%	96.792%	1.8	0.94	0.14	0.15	17	57	0.1	1.00	142.1	453.5	72.4	0.25	0.66	14.8		148	0.25	0.001	0.25	0.05	0.05	Hg

# FORM 5 INDUSTRIAL USER UPDATE

Company Name	Address	SIC/NAICS	Process	Flow, mgd
<b>Categorical Industries Subject to Categorical Discharge Standards</b>				
Boeing Skin & Spar	18001 Canyon Rd. W Puyallup, WA	3278	Aircraft Parts, metal finishing	0.262
Fredrickson Power	18610 50th Ave E. Tacoma, WA	4911	Steam electric power gen.	0.18
<b>Zero Discharge Categorical Industries</b>				
none				0
<b>Non-categorical SIUs</b>				
James Hardie Bldg. Prod. Tacoma 1	4802 180th St E. Tacoma, WA	3272	Cement based siding	0.150
James Hardie Bldg. Prod. Tacoma 2	4615 192nd ST E, Tacoma, WA 98446	3272	Cement based siding	0.350
Land Recovery Inc.	17925 S. Meridian Ave Puyallup, WA	4953	Municipal solid waste landfill	0.061
Niagara Bottling LLC	19820 57th Ave East, Puyallup, WA 98375	312112	Bottling Drinking Water	0.232
		326160	Manufacture of Bottles and Caps	
Pierce County Vactor Decant Facility	4812 196th St. E; Spanaway, Wa 98387	1611	Road Maintenance	0.0063
City of Milton Decant Facility	714 Kent Street, Milton, Wa 98354	9631	Road Maintenance	0.0065
<b>Categorical SIUs added</b>				
None				
<b>Non-Categorical SIUs added</b>				
None				
<b>SIUs delisted</b>				
None				
<b>MIUs with control mechanisms and/or monitoring requirements</b>				
None				

**FORM 6 INDUSTRIAL COMPLIANCE SUMMARY-COMPLIANCE COMPARISON**

Industrial User Name	Permit Issued	Permit Expires	Self. Mon. Frequency	POTW Monitoring											POTW Inspection											Compliance	SNC status	Pollutant	Limit mg/l	Local/Fed.	Occurrences		
				Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events	Events							Events	Events
				2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024								
Boeing Skin & Spar	6/1/2024	6/1/2029	monthly	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	y	n				0
LRI Inc. H.V. Landfill	4/15/2021	4/15/2026	monthly	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	y	n				0
James Hardie Bld. 1	9/1/2022	8/31/2027	monthly	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	y	n				0	
James Hardie Bld. 2	5/1/2023	4/30/2028	monthly	-	-	-	-	1	2	2	2	2	2	2	-	-	-	-	2	1	1	1	1	1	1	1	y	n				0	
Fredrickson Power	6/2/2022	6/1/2027	semi-ann.	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	y	n				0	
Niagara Bottling LLC	8/21/2022	8/20/2027	semi-ann.	1	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	y	n				0	
PC Vactor Decant	5/14/2024	5/13/2029	semi-ann.	0	2	2	2	2	2	2	2	2	2	2	0	1	1	1	1	1	1	1	1	1	1	1	y	n				0	
Milton Decant Facility	4/1/2024	3/31/2029	semi-ann.	-	-	-	-	-	-	2	2	2	2	2	-	-	-	-	-	1	1	1	1	1	1	1	y	n				0	

FORM 7 Significant Industrial User 2024 DATA SUMMARY

Monthly Self-Monitoring Report - Frederickson Power															Semi-Annual Sampling (County)	
			January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:
Date paper copy of DMR received			***	***	***	***	***	***	***	***	***	***	***	***	2-26-2024	7-15-24
Date email copy of DMR was received			02/08/2024	03/04/2024	04/02/2024	05/07/2024	06/05/2024	07/12/2024	08/02/2024	09/05/2024	10/14/2024	11/06/2024	12/03/2024	01/06/2025		
Semi Annual Sampling Date (Fred Power)			***	***	***	***	5/10/2024	***	***	***	***	***	***	11/05/2024	***	
	Notes	Permit Limits														
Arsenic (mg/L)		0.23	***	***	***	***	0.0083	***	***	***	***	***	0.0110	***	0.0109	0.1311
Cadmium (mg/L)		0.11	***	***	***	***	<0.0004	***	***	***	***	***	0.0001	***	<0.0001	<0.0001
Chromium,Total (mg/L)	1	0.190	***	***	***	***	0.0050	***	***	***	***	***	0.0050	***	0.0064	0.0079
Copper (mg/L)		1.00	***	***	***	***	0.0034	***	***	***	***	***	0.0062	***	0.0060	0.0058
Cyanide, Amenable (mg/L)		0.20	***	***	***	***	0.0180	***	***	***	***	***	<0.0200	***	<0.0005	0.0110
Cyanide, Total (mg/L)		0.64	***	***	***	***	<0.0050	***	***	***	***	***	<0.0200	***	<0.0005	0.0080
Lead (mg/L)		0.40	***	***	***	***	0.0001	***	***	***	***	***	0.0001	***	<0.0002	<0.0002
Nickel (mg/L)		1.00	***	***	***	***	0.0009	***	***	***	***	***	0.0002	***	0.0003	<0.0002
Mercury (mg/L)		0.05	***	***	***	***	<0.0000	***	***	***	***	***	<0.0003	***	<0.0002	<0.0001
Phenol (mg/L)		10	***	***	***	***	<0.0200	***	***	***	***	***	<0.0200	***	<0.0300	<0.0300
Selenium (mg/L)		1.45	***	***	***	***	<0.0080	***	***	***	***	***	<0.0080	***	<0.0010	<0.0010
Silver (mg/L)		2	***	***	***	***	<0.0004	***	***	***	***	***	0.0000	***	<0.0002	<0.0002
Zinc (mg/L)	1	0.949	***	***	***	***	0.0100	***	***	***	***	***	0.0074	***	0.0049	0.0015
Fats, Oils & Grease (FOG) (mg/L)		100	***	***	***	***	<4.80	***	***	***	***	***	<5.00	***	<5.00	<5.00
Total Petroleum Hydrocarbons (TPH) (mg/L)		50	***	***	***	***	<4.80	***	***	***	***	***	<5.00	***	<5.00	<5.00
pH Minimum		5.5	7.9	7.5	7.7	7.5	7.8	7.1	7.7	7.4	7.3	7.2	7.3	7.0		
pH Maximum		11.0	8.2	8.2	8.2	8.2	8.2	8.3	8.2	8.4	7.9	7.9	7.9	7.9		
pH Grab		5.5-11.0	***	***	***	***	7.2	***	***	***	***	***	7.4	***	8.14	7.24
Max Daily Flow (gal)		180,000	176,175	172,254	173,516	175,727	176,290	149,141	176,859	178,555	178,474	176,271	178,306	161,457		
Average Daily Flow (gal)	2	NA	110,143	152,466	150,142	151,723	75,080	48,137	161,748	142,214	161,579	160,281	128,171	104,371		
Biochemical Oxygen Demand (BOD) (mg/L)	3	225	***	***	***	***	***	***	***	***	***	***	***	***	2.30	4.70
Total Suspended Solids (TSS) (mg/L)	3	225	***	***	***	***	<2.00	***	***	***	***	***	<1.00	***	1.10	1.40
Molybdenum (mg/L)	4	NA	***	***	***	***	0.0450	***	***	***	***	***	0.0047	***	0.0040	0.0025
Hexavalent Chromium (mg/L)	5	NA	***	***	***	***	***	***	***	***	***	***	***	***		
Sulfate (mg/L)	6	NA	***	***	***	***	***	***	***	***	***	***	***	***	207	282

Notes

1. Total Chromium and Zinc numerical limits are categorical limits to which the combined wastestream formula has been applied.
2. No limit on average daily flow; flow limit is applied to max daily flow only.
3. No local limits for BOD/TSS; surcharge applies to discharge higher than 225 mg/L of either BOD or TSS.
4. No local limit for molybdenum; monitoring requirement only.
5. Hexavalent chromium is no longer a local limit, this has been reflected in Fred Power's permit as of June 2, 2017
6. Sulfate sampling is performed by the County only as part of a continuous Sulfate assessment.

FORM 7 Significant Industrial User 2024 Data Summary

Monthly Self-Monitoring Report - Boeing															Semi-Annual Sampling (County)	
			January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:
Date paper copy of DMR received			***	***	***	***	***	***	***	***	***	***	***	***	3/11/2024	7/23/2024
Date email copy of DMR was received			2/22/2024	3/21/2024	4/19/2024	5/29/2024	6/19/2024	7/24/2024	8/26/2024	9/23/2024	10/15/2024	11/21/24	12/17/2024	1/28/2025		
Semi-annual sampling date (Boeing):			***	***	3/11/2024	***	***	***	7/23/2024	***	***	***	***	***		
	Notes	Permit Limits														
Arsenic (mg/L)		0.23	<0.0010	<0.0004	<0.0004	<0.0004	***	***	<0.0004	***	***	<0.0010	***	***	<0.0100	0.0002
Cadmium (mg/L)	1	0.07	<0.0005	<0.0002	<0.0050	<0.0002	<0.0020	<0.0002	<0.0002	0.0002	<0.0002	<0.0005	<0.0020	<0.0002	<0.0050	<0.0001
Chromium, Total (mg/L)		1.00	<0.0025	0.0019	<0.0250	0.0010	0.00119	<0.00100	0.0014	0.0014	0.0014	<0.0025	<0.0010	<0.0010	<0.0200	0.0016
Copper (mg/L)		1.00	0.0070	0.0133	0.0098	0.0886	0.0102	0.0074	0.0065	0.0085	0.0334	0.0200	0.0164	0.0084	<0.0100	0.0066
Cyanide, Amenable (mg/L)		0.20	<0.0100	***	<0.0100	<0.0100	***	***	<0.0100	***	***	<0.0100	***	***	<0.0050	<0.0050
Cyanide, Total (mg/L)		0.64	0.0060	***	<0.0050	<0.0050	***	***	<0.0050	***	***	<0.0050	***	***	<0.0050	<0.0050
Lead (mg/L)		0.40	<0.0005	<0.0002	<0.0002	<0.0002	***	***	<0.0002	***	***	<0.0005	***	***	<0.0200	<0.0002
Phenol (mg/L)		10	***	***	<0.0400	***	***	***	***	***	***	<0.0400	***	***	<0.0300	<0.0300
Mercury (mg/L)		0.05	<0.0001	***	<0.0001	<0.0001	***	***	<0.0001	***	<0.0001	<0.0001	***	***	<0.0001	<0.0100
Nickel (mg/L)		1.00	<0.0025	<0.0010	<0.0250	<0.0010	<0.00100	<0.0010	<0.0010	0.0010	***	<0.0025	<0.0010	<0.0010	<0.0100	0.0006
Selenium (mg/L)		1.45	<0.0025	<0.0010	<0.0010	<0.0001	***	***	<0.0010	***	<0.0010	<0.0025	***	***	<0.0600	<0.0010
Silver (mg/L)	1	0.24	<0.0010	<0.0004	<0.0004	<0.0004	***	***	<0.0004	***	<0.0004	<0.0010	***	***	<0.0100	<0.0002
Zinc (mg/L)	1	1.48	<0.0300	<0.0120	<0.0300	<0.0120	<0.0010	<0.01200	<0.0120	0.0120	0.0214	<0.0300	<0.0120	<0.0010	0.0021	0.0022
Fats, Oils, & Grease (FOG) (mg/L)		100	***	***	<5.00	***	***	***	***	***	***	<5.00	***	***	<5.00	<5.00
Total Petroleum Hydrocarbon (TPH) (mg/L)		50	***	***	<5.00	***	***	***	***	***	***	<0.20	***	***	<5.00	<5.00
Total Toxic Organics (TTO) (mg/L)	3,4	2.13	***	***	<0.0100	***	***	***	***	***	***	0.0620	***	***	***	0.0618
pH Max		11.0	9.30	9.40	9.00	9.10	8.70	9.08	9.10	9.20	10.50	9.00	8.90	9.20		
pH Min		5.5	8.40	9.10	8.60	8.50	8.70	8.80	8.60	8.70	8.70	8.80	8.70	8.50		
pH Grab		5.5-11.0	***	***	***	***	***	***	***	***	***	***	***	***	9.07	9.00
Biochemical Oxygen Demand (BOD) (mg/L)		225	6.50	***	14.90	13.10	***	***	14.30	***	***	13.60	***	***	10.00	15.9
Total Suspended Solids (TSS) (mg/L)		225	<2.00	***	<6.00	<4.00	***	***	3.00	***	***	<3.00	***	***	2.58	1.57
Max Daily Flow, Treatment Plant (gal)		216,000	92,580	123,890	102,590	86,140	111,900	82,420	110,460	92,690	100,370	40,870	103,500	96,800		
Avg Daily Flow, Treatment Plant (gal)	5	NA	50,740	56,052	47,974	49,092	60,561	38,821	45,532	49,940	23,496	6,055	29,413	34,194		
Max Daily Flow, SSL55 (gal)	6	NA	4,870	609	1,352	967	1,432	3,517	4,819	4,452	7,370	6,001	4,173	6,829		
Avg Daily Flow, SSL55 (gal)	6	NA	4,713	76	200	98	499	983	1,750	1,696	1,607	794	519	841		
Max Daily Flow, Total (gal)		262,263	97,450	123,890	102,651	86,140	112,495	85,937	113,382	92,690	100,370	40,870	103,767	98,800		
Molybdenum, Treatment Plant (mg/L)	2	NA	0.0017	0.0004	<0.0010	0.0005	0.00128	***	0.0005	***	0.0034	0.0013	***	***	<0.0100	0.0004
Molybdenum, SSL55 (mg/L)	2	NA	0.5	0.6	0.5	0.5	0.7	0.7	***	***	***	***	***	***		
Boron (mg/L)	2	NA	0.0588	0.1060	0.1080	0.0951	0.0805	***	0.0883	***	4.6400	0.1840	***	***	0.1500	0.0970
Sulfate (mg/L)	2	NA	***	***	***	***	***	***	***	***	***	***	***	***	44	52

NOTES  
 1) These are Categorical limits required in 40 CFR 433 and applied at the point of discharge from the pretreatment plant.  
 2) These are monitoring requirements only. No local limits are applied to these parameters.  
 3) Boeing calculates TTO by adding all reporting limits equal to or greater than 0.01 mg/L together with any reported results. County adds all reported values together.  
 4) County samples for TTO once annually; TTO sampling was done only in October 2022  
 5) No numerical limit for average daily flow from the treatment plant exists.  
 6) No existing numerical limit for flow from SSL55 (Cooling towers). Flow limits are for max daily treatment plant flow and combined flow only.

FORM 7 Significant Industrial User 2024 Data Summary

Monthly Self-Monitoring Report - James Hardie Tacoma 1															Semi-Annual Sampling (County)	
		January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:	
Date paper copy of DMR received		02/05/2024	03/12/2024	04/10/2024	05/14/2024	05/10/2024	07/12/2024	08/13/2024	09/11/2024	10/15/2024	11/13/2024	12/13/2024	01/13/2025	03/05/2024	08/07/2024	
Date email copy of DMR was received		02/05/2024	03/12/2024	04/10/2024	05/14/2024	05/10/2024	07/12/2024	08/13/2024	09/11/2024	10/15/2024	11/13/2024	12/13/2024	01/13/2025			
Semi-Annual Sampling Date (Company)		***	***	03/05/2024	***	***	***	***	***	***	***	11/14/2024	***			
	Notes	Permit Limits														
Arsenic (mg/L)		0.23	***	***	<0.0010	***	***	***	***	***	***	<0.0010	***	0.0009	0.0005	
Cadmium (mg/L)		0.11	***	***	<0.0004	***	***	***	***	***	***	<0.0004	***	0.0004	<0.0001	
Chromium, Total (mg/L)	2	1.00	0.3200	0.1200	0.1000	0.0720	0.19000	0.13000	0.1700	0.1400	0.0530	0.1300	0.1900	0.1500	0.1090	0.0420
Copper (mg/L)	2	1.00	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	0.0040	0.0097
Cyanide, Amenable (mg/L)		0.20	***	***	***	***	***	***	***	***	***	***	0.0350	***	<0.0050	0.0080
Cyanide, Total (mg/L)		0.64	***	***	0.0640	***	***	***	***	***	***	***	0.0370	***	<0.0050	0.0090
Lead (mg/L)		0.40	***	***	<0.0004	***	***	***	***	***	***	***	0.0008	***	0.0003	0.0003
Mercury (mg/L)		0.05	***	***	<0.0003	***	***	***	***	***	***	***	0.0110	***	0.0001	0.0001
Nickel (mg/L)		1.00	***	***	<0.0030	***	***	***	***	***	***	***	<0.0030	***	<0.2000	0.0033
Phenol (mg/L)		10	***	***	0.0500	***	***	***	***	***	***	***	<0.0200	***	0.0300	<0.0300
Selenium (mg/L)	2	1.45	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	0.0772	0.0327
Silver (mg/L)		2.00	***	***	<0.0004	***	***	***	***	***	***	***	<0.0004	***	<0.2000	<0.0002
Zinc (mg/L)		2.00	***	***	<0.0070	***	***	***	***	***	***	***	0.0140	***	0.0097	0.0098
Fats, Oils & Grease (FOG) (mg/L)		100	***	***	<4.90	***	***	***	***	***	***	***	<4.90	***	<5.00	<5.00
Total Petroleum Hydrocarbons (TPH) (mg/L)		50	***	***	<4.90	***	***	***	***	***	***	***	<4.90	***	<5.00	<5.00
pH Maximum		11.0	10.5	9.7	10.0	9.2	9.0	9.5	9.0	9.3	10.0	9.5	8.9	9.1		
pH Minimum		5.5	6.5	7.2	5.5	6.9	7.0	7.2	7.3	7.3	6.7	7.1	6.8	6.6		
pH Grab		5.5-11.0	***	***	***	***	***	***	***	***	***	***	***	***	7.8	8.0
Max Daily Flow (gal)		150,000	149,000	141,000	136,000	130,000	122,000	118,000	132,000	114,000	114,000	141,000	149,000	149,000		
Average Daily Flow (gal)		NA	97,419	96,379	96,367	92,367	78,645	74,828	55,200	66,586	81,778	89,667	101,655	101,400		
TSS (mg/L)	3	225	65.0	13.0	5.00	<5.00	6.5	<2.5	3.70	22.0	6.40	4	77.00	10.0	29.8	14.7
BOD (mg/L)		225	***	***	***	***	***	***	***	***	***	***	***	***	36	119.5
Molybdenum (mg/L)	2,4	NA	0.7400	0.5700	0.7900	0.5300	0.6500	0.63000	0.5700	0.5100	0.4700	0.6500	0.7400	0.6200	0.7390	0.4222
Sulfate (mg/L)	5	NA	1,400.00	1,200.00	1,100.00	1,100.00	1,200.00	1,300.00	1,200.00	1,200.00	1,300.00	1,300.00	1,200.00	1,100.00	1,310	1,110

NOTES

- James Hardie is required to conduct weekly sampling for these parameters, the value shown for each month is the maximum value out of 4 samples.
- Semi-annual TSS readings are from the combined flow, whereas monthly TSS numbers are end-of-process.
- Molybdenum is a weekly monitoring requirement established in December 2002. No local limit is applied to this parameter.
- Sulfate sampling is part of a continuous sulfate assessment currently being performed by the County.

FORM 7 Significant Industrial User 2024 Data Summary

Monthly Self-Monitoring Report - James Hardie Tacoma 2															Semi-Annual Sampling (County)	
	Notes	January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:	
Date paper copy of DMR received	1	02/05/2024	03/12/2024	04/10/2024	05/14/2024	05/10/2024	07/12/2024	08/13/2024	09/11/2024	10/15/2024	11/13/2024	12/13/2024	01/13/2025	04/03/2024	08/21/2024	
Date email copy of DMR was received		02/05/2024	03/12/2024	04/10/2024	05/14/2024	05/10/2024	07/12/2024	08/13/2024	09/11/2024	10/15/2024	11/13/2024	12/13/2024	01/13/2025			
Semi Annual Sampling Date (James Hardie)		***	***	03/20/2024	***	***	***	***	***	***	***	***	***	11/14/2024	***	
	Permit Limits															
Arsenic (mg/L)	0.23	***	***	<0.0010	<0.0010	***	***	***	***	***	***	***	<0.0010	***	0.0009	0.0014
Cadmium (mg/L)	0.11	***	***	<0.0004	<0.0004	***	***	***	***	***	***	***	<0.0004	***	0.0002	0.0001
Chromium, Total (mg/L)	2 1.00	0.2900	0.2300	0.4000	0.1900	0.42000	0.34000	0.3800	0.2000	0.1100	0.1700	0.1800	0.1700	0.4320	0.3279	
Copper (mg/L)	2 1.00	<0.0600	<0.0600	<0.0600	0.0078	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	<0.0600	0.0334	0.0229	
Cyanide, Amenable (mg/L)	6 0.20	***	***	***	***	***	***	***	***	***	***	***	0.0980	***	0.0250	<0.0050
Cyanide, Total (mg/L)	0.64	***	***	0.0100	***	***	***	***	***	***	***	***	0.0960	***	0.0330	<0.0050
Lead (mg/L)	0.40	***	***	<0.0004	0.0008	***	***	***	***	***	***	***	<0.0005	***	0.0015	0.0016
Mercury (mg/L)	0.05	***	***	0.0031	***	***	***	***	***	***	***	***	<0.0003	***	0.0084	0.0057
Nickel (mg/L)	1.00	***	***	<0.0030	<0.0030	***	***	***	***	***	***	***	<0.0030	***	0.0043	0.0017
Phenol (mg/L)	10	***	***	0.6500	***	***	***	***	***	***	***	***	<0.0200	***	0.0250	<0.0050
Selenium (mg/L)	2 1.45	<0.1000	<0.1000	<0.1000	0.0240	***	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	<0.1000	0.0306	0.0284
Silver (mg/L)	2.00	***	***	<0.0004	<0.0004	***	***	***	***	***	***	***	<0.0004	***	<0.0002	<0.0002
Zinc (mg/L)	2.00	***	***	0.0130	0.0180	***	***	***	***	***	***	***	<0.0070	***	0.0287	0.0220
Fats, Oil, & Grease (FOG) (mg/L)	100.00	***	***	***	***	***	***	***	***	***	***	***	***	***	<4.90	<5.00
Total Petroleum Hydrocarbons (TPH) (mg/L)	50.00	***	***	***	***	***	***	***	***	***	***	***	***	***	<4.90	<5.00
pH Max	11.0	10.6	10.8	10.8	10.9	10.8	10.7	10.8	10.9	10.3	10.9	10.7	9.9			
pH Min	5.5	9.0	6.8	5.5	6.5	6.0	7.7	6.6	6.5	7.6	7.3	6.9	7.3			
pH grab	5.5-11.0	***	***	***	***	***	***	***	***	***	***	***	***	9.6	9.5	
Max Daily Flow (gal/day)	350,000	333,336	329,706	319,972	335,511	333,135	333,833	329,128	331,707	332,755	324,362	332,714	333,677			
Average Daily Flow (gal/day)	3 NA	193,165	243,330	219,171	303,233	283,281	256,643	198,843	197,201	176,764	203,086	185,022	205,525			
Biochemical Oxygen Demand (BOD) (mg/L)	225	***	***	***	***	***	***	***	***	***	***	0.0980	***	155	115.5	
Total Suspended Solids (TSS) (mg/L)	225	33.00	5.60	6.70	13.00	9.20	29.00	12.0	52.0	89.00	39.00	57.00	180	185	300.0	
Molybdenum (mg/L)	2,4 NA	0.4200	0.4600	0.4600	0.3000	0.38000	0.43000	0.3600	0.2700	0.2300	0.2700	0.7100	0.3900	0.360	0.331	
Sulfate (mg/L)	5 NA	770.00	1,000.00	1,200.00	690.00	970.00	1,000.00	710.00	730.00	580.00	770.00	1,200.00	760.00	537	870	

NOTES

- James Hardie is required to conduct weekly sampling for these parameters, the value shown for each month is the maximum value out of 4 samples.
- There is no numerical limit on average daily flow, only max daily flow.
- Molybdenum is a monitoring requirement only. No local limit is applied to this parameter.
- Sulfate sampling is part of a continuous sulfate assessment currently being performed by the County.
- James Hardie did not self-sample amenable cyanide, however the total cyanide value was below the local limit for both total and amenable cyanide. County sampled for amenable cyanide on both sampling dates.

**FORM 7 Significant Industrial User 2024 Data Summary**

Monthly Self-Monitoring Report - Niagara Bottling															Semi-Annual Sampling (County)	
			January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:
Date paper copy of DMR received			2/11/2024	3/11/2024	4/10/2024	5/7/2024	6/13/2024	7/15/2024	8/5/2024	9/9/2024	10/7/2024	11/7/2024	12/9/2024	1/13/2025	2/21/2024	6/6/2024
Date email copy of DMR was received			2/11/2024	3/11/2024	4/8/2024	5/7/2024	6/13/2024	7/15/24	8/5/24	9/3/2024	10/7/2024	11/7/2024	12/9/2024	1/13/2025		
Semi-Annual Sampling Date (Niagara)			***	2/21/2024	***	***	***	6/5/2024	***	***	***	***	***	***		
	Notes	Permit Limits														
Arsenic (mg/L)		0.23	***	<0.0050	***	***	***	<0.0050	***	***	***	***	***	***	0.0007	0.0012
Cadmium (mg/L)		0.11	***	<0.0020	***	***	***	<0.0020	***	***	***	***	***	***	<0.0001	<0.0010
Chromium, Total (mg/L)		1.00	***	<0.0040	***	***	***	<0.00400	***	***	***	***	***	***	<0.0005	0.0009
Copper (mg/L)		1.00	***	<0.0100	***	***	***	<0.0100	***	***	***	***	***	***	0.0056	0.0041
Cyanide, Amenable (mg/L)	1	0.20	***	***	***	***	***	***	***	***	***	***	***	***	<0.0050	0.0050
Cyanide, Total (mg/L)		0.64	***	<0.0200	***	***	***	<0.0200	***	***	***	***	***	***	<0.0050	0.0050
Lead (mg/L)		0.40	***	<0.0020	***	***	***	<0.0020	***	***	***	***	***	***	<0.0002	<0.0010
Mercury (mg/L)		0.05	***	<0.0003	***	***	***	<0.0003	***	***	***	***	***	***	<0.0001	<0.0001
Nickel (mg/L)		1.00	***	<0.0150	***	***	***	<0.0150	***	***	***	***	***	***	0.0007	<0.0010
Phenol (mg/L)		10	***	<0.0100	***	***	***	<0.01000	***	***	***	***	***	***	<0.0300	<0.0300
Selenium (mg/L)		1.45	***	<0.0400	***	***	***	<0.0400	***	***	***	***	***	***	<0.0010	0.0010
Silver (mg/L)		2.00	***	<0.0020	***	***	***	<0.0020	***	***	***	***	***	***	<0.0002	<0.0010
Zinc (mg/L)		2.00	***	<0.0350	***	***	***	<0.0350	***	***	***	***	***	***	0.0069	0.0028
Fats, Oils & Grease (FOG) (mg/L)		100	***	<5.00	***	***	***	<5.00	***	***	***	***	***	***	<5.00	<5.00
Total Petroleum Hydrocarbons (TPH) (mg/L)		50	***	<5.00	***	***	***	<5.00	***	***	***	***	***	***	<5.00	<5.00
pH Maximum		11.0	10.6	10.7	9.6	10.0	9.9	14.9	10.0	9.8	9.0	10.2	10.0	10.5		
pH Minimum	2	5.5	6.3	6.5	6.5	6.3	6.2	2.3	6.7	6.8	7.2	7.0	7.0	7.4		
pH Grab		5.5-11.0	***	***	***	***	***	***	***	***	***	***	***	***	8.27	8.38
Max Daily Flow (gal)	3	232,000	160,905	198,022	160,011	213,811	163,088	179,349	174,043	143,114	111,713	122,791	132,905	120,068		
Average Daily Flow (gal)	5	NA	126,176	125,080	123,719	135,573	125,848	143,365	113,470	113,703	87,150	87,567	79,237	83,789		
Max Flow Rate (gpm)		500	366	396	368	359	332	310	389	304	307	301	314	299		
Total Suspended Solids (TSS) (mg/L)		225	***	***	***	***	***	***	***	***	***	***	***	***	5.83	2.33
Biochemical Oxygen Demand (BOD) (mg/L)		225	***	***	***	***	***	***	***	***	***	***	***	***	7.0	7.04
Molybdenum (mg/L)	6	NA	***	***	***	***	***	***	***	***	***	***	***	***	0.0005	0.0007
Sulfate (mg/L)	7	NA	***	***	***	***	***	***	***	***	***	***	***	***	14.20	9.0

NOTES

- Niagara did not sample for amenable cyanide in 2022, however total cyanide was below the limits for both total and amenable cyanide. County sampled for amenable cyanide twice in 2022. Not applicable to 2024.
- NOV issued for pH violation.
- No numerical limit on average daily flow.
- Molybdenum is a monitoring requirement only; no local limit is applied.
- Sulfate sampling is performed by the County only as part of a continuous sulfate assessment; no local limit is applied.

FORM 7 Significant Industrial User 2024 Data Summary

Monthly Self-Monitoring Report - LRI															Semi-Annual Sampling (County)	
		January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:	
Date paper copy of DMR received		***	***	***	***	***	***	***	***	***	***	***	***	3/27/2024	7/10/2024	
Date email copy of DMR was received		2/14/2024	3/12/2024	4/15/2024	5/13/2024	6/14/2024	7/15/2024	8/13/2024	9/13/2024	10/11/2024	11/15/2024	12/12/2024	1/14/2025			
Semi-Annual Sampling Date (LRI)		***	***	3/27/2024	***	***	***	7/10/2024	***	***	***	***	***			
	Notes	Permit Limits														
Arsenic (mg/L)		0.23	0.0600	0.1200	0.1600	0.1800	0.1900	0.1900	0.2100	0.2700	0.2100	0.2100	0.1800	0.1520	0.0200	
Cadmium (mg/L)		0.11	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0020	<0.0020	<0.0020	<0.0020	0.0007	<0.0010	
Chromium, Total (mg/L)		1.00	0.2200	0.1500	0.3000	0.3300	0.32000	0.32000	0.3400	0.4100	0.4500	0.3800	0.3000	<1.0000	0.0400	
Copper (mg/L)		1.00	0.3400	0.0280	0.0370	0.0370	0.0350	0.0320	0.0250	0.0250	0.0300	0.0260	0.0360	<0.5000	<0.0050	
Cyanide, Amenable (mg/L)		0.20	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	0.0230	0.0210	
Cyanide, Total (mg/L)		0.64	<0.0500	<0.0500	<0.0500	<0.0500	<0.05000	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	<0.0500	0.0490	0.0210	
Lead (mg/L)		0.40	0.0055	<0.0040	<0.0040	<0.0040	<0.0040	0.0580	<0.0040	0.0042	0.0051	0.0045	0.0032	0.0013	<0.0020	
Mercury (mg/L)		0.05	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0006	<0.0003	<0.0003	<0.0003	<0.0003	<0.0001	<0.0001	
Nickel (mg/L)		1.00	0.1700	0.2200	0.3000	0.3100	0.3300	0.3200	0.3500	0.3800	0.4000	0.3600	0.3000	<0.5000	0.0309	
Phenol (mg/L)		10	***	<0.0000	0.1000	***	***	***	<0.0000	***	***	***	0.0000	<0.0300	<0.0300	
Selenium (mg/L)		1.45	<0.0800	<0.0800	<0.0800	<0.0800	<0.0800	<0.0800	<0.0800	<0.0400	<0.0400	<0.0400	<0.0400	0.0353	<0.0100	
Silver (mg/L)		2.00	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0040	<0.0020	<0.0020	<0.0020	<0.0020	<0.5000	<0.0020	
Zinc (mg/L)		2.00	0.3600	0.3500	0.4000	0.2500	0.2100	0.8500	0.1600	0.1700	0.1700	0.1500	0.1400	<0.7500	0.0200	
Fats, Oils & Grease (FOG) (mg/L)		100	5.80	<4.70	11.00	<5.20	8.30	<4.70	<5.70	<7.50	<7.50	<6.70	<4.70	***	***	
Total Petroleum Hydrocarbons (TPH) (mg/L)		50	<5.10	<4.70	<4.80	<5.20	<4.80	<4.70	<5.70	<7.50	<7.50	<6.70	<4.70	***	***	
pH Maximum		11.0	7.45	7.28	7.23	7.12	7.80	7.05	7.02	7.07	7.08	7.56	7.60			
pH Minimum		5.5	7.16	7.10	7.03	6.97	6.87	6.91	6.94	6.96	6.82	6.58	7.30			
pH Grab		5.5-11.0	***	***	***	***	***	***	***	***	***	***	***	7.73	7.76	
Max Daily Flow (gal)	2	32,590	79,905	109,909	109,909	61,604	61,603	61,603	61,603	61,603	22	61,604	61,603	61,603	61,603	
Average Daily Flow (gal)		NA	58,003	92,982	81,436	61,603	61,603	61,603	61,430	61,142	22	61,603	61,603	61,603	61,603	
Total Suspended Solids (TSS) (mg/L)	5	225	320.0	6	23	<3	8	<2	1	7	<2	5	<4	<2	1	
Biochemical Oxygen Demand (BOD) (mg/L)	5	225	30	9	11	3	3	3	4	3	3	3	6	3	4	
UVT %	1	47	82.2	82.7	73.8	73.9	75.3	74.3	72.3	69.9	70.7	72.7	74.5	75.4	73.7	
Molybdenum (mg/L)	4	NA	0.0250	0.0240	0.0250	0.0310	0.0340	0.03300	0.0410	0.0470	0.0580	0.0560	0.0550	0.0390	0.0033	
Sulfate (mg/L)	3	NA	***	***	***	***	***	***	***	***	***	***	***	***	116	

NOTES

1. UVT limit due to interference with the UV disinfection at the Chambers Creek WWTP
2. Flow limit is 32,590 due to UVT interference at low flow times
3. Sulfate sampling is part of a continous sulfate assessment currently being performed by the County.
4. Molybdenum is a monitoring requirement only. No local limit is applied to this parameter.
5. No local limits for BOD/TSS; surcharge applies to discharge higher than 225 mg/L of either BOD or TSS.

FORM 7 Significant Industrial User 2024 Data Summary

Monthly Self-Monitoring Report - Pierce County Decant															Semi-Annual Sampling (County)	
			January	February	March	April	May	June	July	August	September	October	November	December	Sampling Date:	Sampling Date:
Date paper copy of DMR Received			***	***	***	***	***	***	***	***	***	***	***	***	4/2/2024	7/25/2024
Date email copy of DMR received			2/6/2024	3/4/2024	4/9/2024	5/3/2024	6/6/2024	7/11/2024	8/7/2024	9/5/2024	10/3/2024	11/7/2024	12/12/2024	1/6/2025		
Semi-Annual Sampling Date			***	***	***	4/2/2024	***	***	7/25/2024	***	***	***	***	***		
	Notes	Permit Limit														
Arsenic (mg/L)		0.23	***	***	***	0.00201	***	***	0.00174	***	***	***	***	***	0.0020	0.0024
Cadmium (mg/L)		0.11	***	***	***	<0.00020	***	***	<0.00010	***	***	***	***	***	<0.0001	<0.0001
Chromium, Total (mg/L)		1.00	***	***	***	<0.00030	***	***	<0.00100	***	***	***	***	***	0.0012	0.0009
Copper (mg/L)		1.00	***	***	***	0.00420	***	***	0.00080	***	***	***	***	***	0.0053	0.0097
Cyanide, Amenable (mg/L)		0.20	***	***	***	<0.01000	***	***	<0.01000	***	***	<0.01000	***	***	0.0060	0.0050
Cyanide, Total (mg/L)		0.64	***	***	***	<0.00500	***	***	<0.00500	***	***	***	***	***	<0.0050	<0.0050
Lead (mg/L)		0.40	***	***	***	0.00050	***	***	0.00020	***	***	***	***	***	0.0005	0.0004
Mercury (mg/L)		0.05	***	***	***	<0.00000	***	***	<0.00010	***	***	***	***	***	<0.0001	<0.0001
Nickel (mg/L)		1.00	***	***	***	0.00170	***	***	0.00240	***	***	***	***	***	0.0017	0.0030
Phenol (mg/L)		10	***	***	***	0.09000	***	***	<0.04000	***	***	***	***	***	0.0310	<0.0300
Selenium (mg/L)		1.45	***	***	***	<0.00100	***	***	0.00020	***	***	***	***	***	<0.0010	0.0014
Silver (mg/L)		2.00	***	***	***	<0.00040	***	***	0.00020	***	***	***	***	***	<0.0002	<0.0002
Zinc (mg/L)		2.00	***	***	***	0.01470	***	***	0.00430	***	***	***	***	***	0.0140	0.0066
Total Petroleum Hydrocarbons (TPH) (mg/L)		50	***	***	***	<5.00000	***	***	<5.00000	***	***	***	***	***	<5.00	<5.0000
Fats, Oils & Grease (FOG) (mg/L)		100	***	***	***	<5.00000	***	***	<5.00000	***	***	***	***	***	<5.00	<5.0000
pH	1	5.5 - 11.0	***	***	***	7.20	***	***	7.20	***	***	***	***	***	7.20	7.20
Total Suspended Solids (TSS) (mg/L)		225	***	***	***	***	***	***	***	***	***	***	***	***	10.10	5.20
Biochemical Oxygen Deman (BOD) (mg/L)		225	***	***	***	***	***	***	***	***	***	***	***	***	11.60	10.90
Max Daily Flow (gal)		6300	5,919	5,909	5,915	5,918	5,917	5,922	5,917	5,919	5,915	5,918	5,919	5,915		
Average Daily Flow (gal)	2	NA	5,067	5,386	4,878	4,927	5,511	5,240	3,884	5,643	5,735	5,211	5,120	5,272		
Flow Rate (gpm)	3	141	***	4	***	***	***	***	***	***	***	***	***	***		
Days Discharged		NA	9	4	6	9	9	9	3	8	10	14	13	15		
Molybdenum (mg/L)	4	NA	***	***	***	0.00440	***	***	0.00400	***	***	***	***	***	0.0045	0.0032
Fecal Coliform (CFU)	5	NA	***	***	***	***	***	***	***	***	***	***	***	***		
Sulfate (mg/L)	6	NA	***	***	***	***	***	***	***	***	***	***	***	***	4.6	5.05

Notes

- pH is not a continuous monitoring requirement for PC Decant. pH is measured during semi annual sampling only.
- No numerical limit for average daily flow; flow limit is for maximum only.
- Flow rate is no longer reported since a flow meter has been installed as of 2017. Flow rate and pump run time were previously used to measure discharge volume.
- Molybdenum is a monitoring requirement only and no local limit is applied.
- Fecal coliform is not a monitoring requirement and is not routinely measured by PC Decant.
- Sulfate is sampled by County (Pretreatment) only as part of a continuous sulfate assessment.

**FORM 8 Pretreatment Enforcement Summary - SIUs**

Industrial User	Calls	Meetings	NOV's	Penalties	SNC Y/N	Comments
LRI-Landfill	0	2	1	0	N	NOV issued then later rescinded
Boeing	2	1	0	0	N	Discuss new permit extension and PFAS monitoring
James Hardie Tac 1	2	4	0	0	N	AKART sulfate reduction meeting
James Hardie Tac 2	2	4	0	0	N	AKART sulfate reduction meeting
Fredrickson Power	0	1	0	0	N	Discuss reduction of sulfate production
Niagara Bottling LLC	0	0	1	0	N	NOV corrective actions were successful.
PC Vactor Decant	0	0	0	0	N	
City of Milton Decant	-	2	-	-	-	Industrial user discharge permit renewal

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## **FORM 9 Resource Summary**

For the calendar year 2024, the pretreatment program was fully equipped with the proper resources to complete daily tasks required to keep insignificant, minor, and significant industrial users in compliance with Pierce County's local limits and best management practices. The Pierce County pretreatment program is currently staffed with two full-time pretreatment technicians who provide wastewater pretreatment support for the County's three distinct districts. For 2024 Pierce County's pretreatment program will look to improve its program by obtaining additional field monitoring equipment to better support the County's sewer infrastructure, pretreatment devices, and overall water quality.

# FORM 10 Summary and Acknowledgement

Annual Pretreatment Performance Summary  
 I. General Information

Control Authority Name: **Pierce County**  
 Address: **10311 Chambers Creek Rd W**  
 City: **University Place** State: **WA** Zip: **98467**  
 Contact Person: **River Wan**  
 Contact Telephone: **(253) 798-3002**  
 NPDES nos: **WA 0039624**  
 Reporting Period: **1/1/24 to 12/31/24**  
 Total Categorical IUs: **2**  
 Total Significant Noncategorical IUs: **6**

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



Authorized Representative

Date: February 26, 2025

II. Significant Industrial User Compliance	Significant Industrial Users	
	Categorical	Noncategorical
1) Total number of users by category	2	6*
2) Users submitting BMRs / Number required	0/0	0/0
3) Users submitting 90 compliance reports / number required	0/0	0/0
4) Users submitting semi-annual report / # required	2/2	5/5
5) Users meeting compliance schedules / # required	0/0	0/0
6) Total Users in SNC status	0	0
7) Users in SNC with Standards and Reporting	0	0
8) Users in SNC with Self Monitoring	0	0
9) Users in SNC with Self Monitoring and Not Inspected or Sampled	0	0
10) Users Not Inspected or Sampled	0	0
III. Compliance Monitoring Program		
1) Users without a permit	0	0
2) Total inspections conducted	2	5
3) Total POTW sampling visits conducted	4	10
4) Number of facilities sampled	2	5
5) Technically Based Limits Developed Y/N		Y
6) Local Limits Have Been Codified Y/N		Y
IV. Enforcement Actions		
1) Compliance Schedules Issued/Required	0/0	0/0
2) Notices of Violations Issued to Users	0	2
3) Administrative Orders issued to Users	0	0
4) Civil Suits Filed	0	0
5) Criminal Suits Filed	0	0
6) Significant Violators (attach list as published in newspaper)	0	0
7) Penalties Collected (dollars/lus assessed)	0/0	0/0
8) Other Actions (suspended service etc.)	0	0

\*included City of Milton Decant Facility