



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

May 23, 2013

Mr. Bruce Rawls, PE
Spokane County Division of Utilities
1026 Broadway Ave
Spokane, WA 99206-0430

Re: Spokane County's Pretreatment Program Compliance Audit (PCA) Results
NPDES Permit numbers: WA-0024473-3 and WA-0093317

Dear Mr. Rawls:

We sincerely appreciate the time your staff spent with Ecology during the Pretreatment Compliance Audit (PCA) on June 12 and 13, 2012. Enclosed is the PCA Report.

Based on the attached PCA checklist, Spokane County is in compliance for your pretreatment program.

However, Spokane County did have one Level II violation and a recommended improvement. These items are as follows:

- Level II violation: Failure to have an updated adequate multi-jurisdictional agreement between City of Spokane and Spokane County. (UPDATE: An updated MJA between Spokane County and the City of Spokane was executed on 12-11-2012 by Spokane County and on 1-16-20 by the City of Spokane. This item is completed and is no longer an issue.)
- Recommendation: Development of Effective Data Management System.

Currently, the Spokane County Pretreatment Program modifications are in the process for approval. Upon approval, Spokane County will no longer have to submit bi-monthly updated reports as required from your 2008 Pretreatment Compliance Audit

If you have any questions, please contact me at (509) 329-3473 or email at smal461@ecy.wa.gov.

Sincerely,

Scott Mallery, PE
Pretreatment Engineer
Water Quality Program

SM:dw

Enclosure: Water Compliance Inspection Report

cc: Dale Arnold, City of Spokane
Dave Moss, PE, Spokane County
Dave Knight, SWRO, Department of Ecology
Michael Le, EPA Region 10-Pretreatment



Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

[illegible]

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Spokane County, Division of Utilities, 1026 W Broadway Ave, Spokane, WA 99260 City of Spokane Wastewater Treatment Plant, 4401 N Aurbrey L. White Parkway, Spokane, WA 99205 NPDES number: WA-002447-3	Entry Time/Date 9:00am/June 12, 2012	Permit Effective Date 1-Jul-11
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers Dave Moss, County of Spokane Pretreatment Coordinator, (509) 477-7268 Stela Matei, County of Spokane Pretreatment Engineer, (509) 477-7177 Tim Pelton, City of Spokane Pretreatment Coordinator, (509) 625-4661 Randy Kueter, Pretreatment/CH2MHill, (509) 215-0412	Exit Time/Date 4:00pm/June 13, 2012	Permit Expiration Date June 30, 2016
Name, Address of Responsible Official/Title/Phone and Fax Number Scott Mallery, Pretreatment Engineer Washington State Department of Ecology 4601 North Monroe St, Spokane, Washington 99205 (509) 329-3473; Fax (509) 329-3570	Other Facility Data (e.g., SIC, NAICS, and other descriptive information) <div style="text-align: right;"> Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div>	



Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit	<input checked="" type="checkbox"/>	Self-Monitoring Program	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Compliance Schedule	<input type="checkbox"/>	Pollution Prevention		
<input type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input type="checkbox"/>	Storm Water		
<input type="checkbox"/>	Effluent/Receiving Waters	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

[illegible]

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Scott Mallery 	Ecology/Spokane/(509)329-3479 Fax-(509) 329-3570	5/20/2013
		
Signature of Management QA Reviewer	Ecology/Spokane/(509)329-3504 Fax-(509)329-3570	Date 5/20/2013

EPA Water Compliance Inspection Report
Section D. Summary of Findings/Comments (continued)

The State of Washington Department of Ecology conducted pretreatment compliance audit (PCA) on Spokane County from June 12 to June 13, 2012. Based off the attached PCA checklist, the Spokane County is in compliance for their pretreatment program. However, Spokane County currently has one Level II violation and a recommended improvement. These items as follows:

- 1) Level II violation: Failure to have an updated adequate multi-jurisdictional agreement (MJA). See **Note 1** below.
- 2) Recommendation: Development of Effective Data Management System. See **Note 2** below.

More details of the Level II and recommendation are below. Additionally, the PCA checklist is attached.

Note 1: The City of Spokane and Spokane County need a new MJA due to the fact that Spokane County has a new treatment plant. This MJA is needed for the County to fully implement their legal authority for their pretreatment program and receive final approval from Ecology of their pretreatment changes. (Reference: PCA Checklist: 1.B.1&3)

{UPDATE: An updated MJA between the Spokane County and City of Spokane was executed on 12-11-2012 by the Spokane County and on 1-16-20 by the City of Spokane. This item is completed and is no longer an issue.}

Note 2: With the Spokane County hiring a contractor to run their pretreatment program, the City of Spokane's LINKO system will not be used by the County. Therefore, the County needs an effective data management system as soon as possible. If this system does not go in effect soon, the County will not be able to implement their pretreatment program adequately. (Reference: PCA Checklist: I.H.)

Section D: COMPLETED BY: *Scott Mallery*

TITLE: *Pretreatment Engineer*

DATE: *5/21/2013*

TELEPHONE: *509-329-3473*

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym/Abbreviation List

Section I Data Review

Section II IU File Evaluation

Section III Observations and Concerns

☒ Attachment A Pretreatment Program Status Update

☒ Attachment B Pretreatment Program Profile

☐ Attachment C Legal Authority Review Checklist

Attachment D Worksheets

☐ NA Site Visit Data Sheet

☒ WENDB Data Entry Worksheet

☒ PCA Required ICIS Data Elements Worksheet

☒ RNC Worksheet

Attachment D Supporting Documentation

Inspection Reports; permits, ERP, violations letters, and SNC and Confidential information

Control Authority (CA) name and address			Date(s) of audit	
Spokane County 1026 W. Broadway Ave Spokane, WA 99260-0430			June 12 and 13, 2012	
Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
City of Spokane Riverside Park Water Reclamation Facility (RCRWRF)	WA-002447-3	7/1/2011	6/30/2016	No
Spokane County Regional Water Reclamation Facility (SCRWRF)	WA-0093317	12/1/2011	11/30/2016	No
AUDITOR(S)				
Name	Title/Affiliation	Telephone Number	Email Address	
Scott Mallery	Pretreatment Engineer/Ecology	(509) 327-3473	smal461@ecy.wa.gov	
CA REPRESENTATIVE(S)				
Name	Title/Affiliation	Telephone Number	Email Address	
Dave Moss	Spokane County Pretreatment Coordinator		dmoss@spokanecounty.org	
Stela Matei-Rowey	Spokane County Pretreatment Engineer	(509) 477-7177	smatie@spokanecounty.org	
Randy Kueter	Pretreatment/CH2MHill	(509) 215-0412	Randy.kueter@ch2m.com	
Tim Pelton	City of Spokane Pretreatment Coordinator	(509) 625-4661	tpelton@spokanecity.org	

ACRONYM AND ABBREVIATION LIST

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

ACRONYM AND ABBREVIATION LIST (CONTINUED)

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

GENERAL INSTRUCTIONS

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

SECTION I: DATA REVIEW

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

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

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

Yes	No
	X

If yes, discuss.

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

Yes	No
X	

If yes, describe.

Spokane County is still in the process of updating their program for 2005 Revisions and have built their own wastewater treatment plant. With this new plant, the City of Spokane and Spokane County have to develop and implement a new multijurisdictional agreement. It is still in the process of completion. Projected completion date-end of December 2012.

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

Yes	No
	X

If yes, describe.

SECTION I: DATA REVIEW (CONTINUED)

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

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

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

Yes	No
X	
X	
X	
X	
X	
X	
X	
X	

If not, when?

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

Yes	No
X	

If yes, check which ones.

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

SECTION I: DATA REVIEW (CONTINUED)

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

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

Yes

No

X

If yes, describe.

Yes

No

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

X

If yes, what were the issues?

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

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

Yes

No

X

If yes, complete questions b–e.

b. List the contributing jurisdictions. City of Millwood and City of Spokane

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities? But, the City of Spokane and Spokane County needs to update their MJA due to the fact the County has their own treatment plant.

Yes

No

X

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

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

SECTION I: DATA REVIEW (CONTINUED)

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

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

Yes

No

X

If yes, explain.

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

Yes

No

X

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

X

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

X

Explain: Spokane County has updated their SUO and Pretreatment Elements. Their update is awaiting approval due to a new MJA is needed between the City of Spokane and Spokane County.

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

Yes

No

X

If yes, explain. The City of Spokane and Spokane County needs a new MJA due to the fact that Spokane County has a new treatment plant. This MJA is needed for the County to fully implement their legal authority for their pretreatment program and final approval from Ecology of their pretreatment changes.

SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?) SIU is defined just like 40 CFR 403.3. The Contributing Jurisdictions have the same definition as CA.

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

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

2. How are SIUs identified and categorized (including those in contributing jurisdictions)? The County uses sewer hookup, SEPA, business licenses, phone books, and local paper. Then they usually send them an IWS.

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)? The County does update every 5 years. However, they try and do 25% of their IWS every year.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)? If the facility doesn't have a permit, at least every 5 years with a new IWS for those facilities.

SECTION I: DATA REVIEW (CONTINUED)

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

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

a.	8	SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
	6	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		Middle-tier CIUs** (specify below)
	2	Noncategorical SIUs
b.	1	Other regulated nonsignificant IUs (specify)
		Noncategorical nonsignificant IUs
		NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
	1	Zero-discharging CIUs** (specify below)
c.	9	TOTAL

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

List of NSCIUs and zero-discharging CIUs: Mackay Manufacturing (40 CFR 433)

List of Middle-Tier CIUs: NA

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

List of SIUs with general control mechanisms: None at this Time.

SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]

0

0 %

b. Has the CA implemented any general control mechanisms? None

c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism?

0

List the types of SIUs covered under a general control mechanism:

d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]

0

If any, explain.

2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA? Spokane County Landfill

Yes

b. How are control mechanisms (specifically limits) developed for these facilities? By an engineering report and looking at the RCRA/CERCLA and Water Quality regulations.

Discuss

3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?

Yes

No

X

b. Is any of the waste hazardous as defined by RCRA?

X

c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?

X

d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)] The new treatment plant has designated a specific place for hauled wastes. It has its own holding tanks and entry points.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

The facility has pH, BOD5, and metals limits.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)] By attending the annual Pretreatment Conference, and in communications with the State Pretreatment Engineer.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)] Already approved the Local Limits for both plants. The County plant is sampling for metals, and others parameters for the next few years to see in Local Limits need updating.

a. For what pollutants have local limits been set? Not at this time

b. How were these pollutants selected? Not at this time

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

Not at this time

d. Which allocation method(s) were used?

Not at this time

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

Not at this time

f. When was the CA's last local limits evaluation? What was the approval date? May 31, 2012.

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

If yes, how has this been addressed?

Yes	No
	X

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation? Developing for the new treatment plant, they had to use literature values and compare to similar facilities.

F. COMPLIANCE MONITORING

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

The County looks at past Data, Engineering Report, and if it will effect the treatment plant or not. From this, the County does at least one inspection and sampling a year—if there are issues, the County will sample and inspect more often. The facilities will at least monitor/sample twice a year.

b. Is the frequency established above more, less, or the same as required? Same
Explain any difference.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? NO. If yes, list IUs.

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

(Define the 12-month period: 1/1/ 2011 to 12/31/ 2011)

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

0	0	%
0	0	%
0	0	%

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

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

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

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

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

SNC Evaluation Period 1/1/2011 to 12/31/2011

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

*SNC defined by:

POTW	0
STATE	0

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs. NA

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

Evaluation Period: 1/1/2011 to 12/31/2011

Number of SIUs: 5

Names of SIUs: Ecolite, Galaxy Compound Semiconductors, Honeywell Electronic Materials, Kermira, and Mica Landfill.

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

The items mentioned in 4. Spokane County has.

Request a copy of the CA's inspection form, if applicable. As part of the Audit, the inspections reports for American On-Site Services, Novation, and Lloyd Industries are include with the inspection checklist/form.

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

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
City of Spokane/CH2 Hill/Applied Sciences/Test America
City of Spokane/CH2 Hill/Applied Sciences/Test America
City of Spokane/CH2 Hill/Applied Sciences/Test America

All of these facilities are accredited by Department of Ecology.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

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

Check all that are applicable.

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

7. Discuss any problems encountered in identification of sample location, collection, and analysis. None

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

[403.12(j)&(p)]

Yes	No
	X

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs? Phone calls, inspections, and permit requirements. This last occurred at the IUs inspections.

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

If the SIU is a new permit, the CA looks at the facility and determined if they need plan or not. And, at each permit renewal, the facilities are reevaluated.

List SIUs required to have a slug discharge control plan: American Onsite Services; Ecolite; Galaxy Compound Semiconductors; Honeywell Electronic Materials; Kemira; Lloyd Industries; Mica Landfill; and Novation.

Yes	No
X	

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

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)] See Appendix D – Supporting Documents (SUO—8.03A.0801 B.

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

a. Has the ERP been adopted by the POTW? Yes

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

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

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

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

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

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

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

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

Yes

No

X

X

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

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

Yes

No

X

If yes, attach a copy.

If no, explain. None of their facilities were SNC during this time period

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

0

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

0

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

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

Yes

No

Unknown

Explain

X

X

X

X

X

X

X

X

X

X

X

X

X

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

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

Yes

No

X

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

Yes

No

X

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

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

The County has a procedure for this information. See Appendix D – Supporting Documents: Article 7-Confidential Information (8.03A.0701)

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

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so? No. No plans at this time.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities. The County is transferring from the City of Spokane LINKO system to a new data management system. The new data management system is not completely identified. With no data management system, County will have issues implementing their Pretreatment Program.

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

6. Explain any public or community issues affecting the CA's pretreatment program. None

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

A least 3 years

SECTION I: DATA REVIEW (CONTINUED)

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

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

Activity	FTEs	Activity	FTEs
Legal Assistance	0.1	Sample Analysis	0.1
Permitting	0.6	Data Analysis: Review and Response	0.6
Inspections	0.3	Enforcement	0.6
Sample Collection	0.1	Administration	0.6

Total Number of FTEs 3.0

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

Yes **No**

X

If not, explain. Currently, they are using the City of Spokane equipment due to their current MJA. However, in the future their contractor will be doing the sampling.

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

\$ 300,000 to 350,000

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

Actual costs vary each year. Costs have been increasing. Program is comprehensive so significant cost changes are not currently anticipated.

Discuss any changes in funding.

Program budgets are established annually. The County's sewer rates are currently adequate to cover the anticipated costs.

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

There are no problems at this time. However, the County is switching for using the City of Spokane pretreatment program personnel to a contractor who is operating their new wastewater plant.

SECTION I: DATA REVIEW (CONTINUED)

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

5. a.

. How does the CA ensure that personnel are qualified and up-to-date with current program requirements? Attend the Annual Pacific Northwest Pretreatment Workshop and have done some of the Pretreatment Webinars . Also, they are on a couple list serves for Pretreatment.

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

Yes	No
X	

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the POTW monitored in the past year? Not looked at. In annual report.

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

Influent	Effluent	Sludge	Ambient (Receiving Water)		

red by the NPDES

Less	Equal	More

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

Explain any differences.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

c. Is the CA reporting these results to the Approval Authority?

If yes, at what frequency? At least annual and monthly

Yes

No

X

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

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

Yes

No

X

X

X

X

X

X

b. Has the CA documented these findings? Annual Report

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

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

Discuss on a pollutant-by-pollutant basis. NA

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

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

Yes

No

X

If yes, what was found?

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

Yes

No

X

b. Are there any plans to initiate such a program to educate users about pollution prevention? Dental facilities will be looked at in the next few years

X

Explain.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? None right now

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

Yes

No

X

Explain.

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

The County should continue to use inspection checklist for inspections and ensure the facility knows which sampling they are need to do.

SECTION I COMPLETED BY:
Scott Mallery, PE
TITLE: Pretreatment Engineer

DATE: 12/19/2012
TELEPHONE: (509) 329-3473

SECTION II: IU FILE EVALUATION

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

IU IDENTIFICATION

FILE <u> 1 </u> Industry name and address Lloyd Industries 3808 N Sullivan Road BLDG 25 East Spokane, WA 99216	Type of industry: Metal Finisher Permit #SIU-3471-03 SIC Code: NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR _433.17_____, _____, _____ Permit expires Jan 31, 2016 Category(ies) _____	Average total flow (gpd) 2,175	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments The facility makes pizza pans and other pots/pans.		

FILE <u> 2 </u> Industry name and address Novation 1616 North Locust Road Spokane Valley, WA 99205	Type of industry: Metal Finisher Permit #SIU-3471-02-A SIC Code: NAICS Code:	
<input checked="" type="checkbox"/> CIU 40 CFR _433.17_____, _____, _____ Category(ies) _____	Average monthly total flow (gpd) 10,000	Average process flow MAX—12,000 gpd
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE <u> 3 </u> Industry name and address American On-Site Services 3808 N Sullivan Rd BLDG 107 Spokane, WA	Type of industry: Portable Toilet Services Permit #:SIU-7359 SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Permit expires – 8/5/2013 Category(ies) _____	Average total flow (gpd) Batch-200 gal per discharge	Average process flow DAILY MAX- 2500 gpd
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments Issues with 1,4 Dichlorobenzene (3.55 mg/l). need to protect worker safety		
FILE <u> NA </u> Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.
Lloyd	Novation	American On-Site			
File 1	File 2	File 3	File —	File —	
IU FILE REVIEW					Reg. Cite
A. ISSUANCE OF IU CONTROL MECHANISM					
✓	✓	✓			<div style="margin-bottom: 10px;">1. Control mechanism application form</div> <div style="margin-bottom: 10px;">2. Fact sheet</div> <div style="margin-bottom: 10px;">3. Issuance or reissuance of control mechanism <div style="margin-left: 20px;">a. Individual control mechanism</div> <div style="margin-left: 20px;">b. General control mechanism</div> </div> <div style="margin-bottom: 10px;">4. Control mechanism contents <div style="margin-left: 20px;">a. Statement of duration (≤ 5 years)</div> <div style="margin-left: 20px;">b. Statement of nontransferability w/o prior notification/approval</div> <div style="margin-left: 20px;">c. Applicable effluent limits (local limits, categorical standards, BMPs)</div> </div>
✓	✓	✓			
✓	✓	✓			
✓	✓	✓			
✓	✓	✓			
✓	✓	✓			
✓	✓	✓			
✓	✓	✓			
Comments					<div style="margin-bottom: 10px;">403.8(f)(1)(iii)</div> <div style="margin-bottom: 10px;">403.8(f)(1)(iii)(A)</div> <div style="margin-bottom: 10px;">403.8(f)(1)(iii)(B)</div> <div style="margin-bottom: 10px;">403.8(f)(1)(iii)(B)(1)</div> <div style="margin-bottom: 10px;">403.8(f)(1)(iii)(B)(2)</div> <div style="margin-bottom: 10px;">403.8(f)(1)(iii)(B)(3)</div>

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File		Reg.
------	------	------	------	------	--	------

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

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4	File 5	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
√	√				1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
√	√				a. Classification by category/subcategory	
√	√				b. Classification as new/existing source	
√	√				c. Application of limits for all regulated pollutants	
					d. Classification as an NSCIU	403.3(v)(2)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling waiver for pollutant not present	403.12(2)(iv)
√	√				3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
					5. Calculation and application of production-based standards	403.6(c)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4	File 5	IU FILE REVIEW	Reg. Cite
D. CA ENFORCEMENT ACTIVITIES (continued)						
√	√	√			2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
					3. Response to violation	
					4. Adherence to approved ERP	403.8(f)(5)
					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
					6. Escalation of enforcement	403.8(f)(5)(ii)
					7. Publication for SNC	403.8(f)(2)(viii)
Comments						
NO SNC Violations for 2011						

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

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

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4	File 5	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
					7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					• IU is effectively operating treatment technologies to achieve compliance	
					• IU is recording the facility's flow rates	
					• IU is recording the facility's production rates	
					• IU has notified the CA whenever production rates vary	
					• IU continues to employ water conservation methods/technologies	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File <u>1</u>	File <u>2</u>	File <u>3</u>	File _____	File _____	IU FILE REVIEW	Reg. Cite
						F. OTHER
Comments						
SECTION II COMPLETED BY:					DATE:	
Scott Mallery, PE					11/16/2012	
TITLE: Pretreatment Engineer					TELEPHONE:	
					(509) 329-3473	

SECTION III: OBSERVATIONS AND CONCERNS

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

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> Status of program modifications 	403.18	I.A.1
<ul style="list-style-type: none"> Modification to the program to accommodate the 2005 General Pretreatment Regulation changes 	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements 	403.8(f)(1)	I.B.2&3
<ul style="list-style-type: none"> Adequate multijurisdictional agreements <p>City of Spokane and Spokane County needs to update their MJA to implement their pretreatment programs adequately. The Spokane County has their own wastewater treatment plant and their contractor is now running their pretreatment program.</p>	403.8(f)(1)	I.B.1&3

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> Application of <i>significant industrial user</i> definition 	403.3(v)(1)	I.C.1; Attach B.E.2
<ul style="list-style-type: none"> Application of <i>middle-tier CIU</i> definition 		
<ul style="list-style-type: none"> Application of <i>NSCIU</i> definition 		
<ul style="list-style-type: none"> Identify and categorize IUs 	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> Issuance of individual or general control mechanisms to all SIUs 	403.8(f)(1)(iii)	I.D.1
<ul style="list-style-type: none"> Adequate control mechanisms 	403.8(f)(1)(iii)(B)	II.A.4
<ul style="list-style-type: none"> Adequate control of trucked, railed, and dedicated pipe wastes 	403.5(b)(8)	I.D.2&3, E.1

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards 	403.8(f)(1)(ii)&(iii) 403.5	II.B
<ul style="list-style-type: none"> Basis and adequacy of local limits 	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency 	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> Adequate inspections 	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> Adequate sampling protocols and analysis 	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
<ul style="list-style-type: none"> Adequate IU self-monitoring 	403.8(f)(2)(iv)	I.F.6; G.5; II.E
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges 	403.12(j)&(p)	I.F.8; II.D.1.b
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans 	403.8(f)(2)(vi)	I.F.9; II.C.4
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) 	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of <i>significant noncompliance</i> definition 	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
<ul style="list-style-type: none"> Develop and implement an ERP 	403.8(f)(5)	I.G.2; II.D.3
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC 	403.8(f)(2)(viii)	I.G.4; II.D.7

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
<ul style="list-style-type: none"> Effective enforcement 	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation <p>With the Spokane County hiring a contractor to do their pretreatment program, the City of Spokane's LINKO system will not be used by the County. Therefore, the County needs a data management system as soon as possible. If this system does not go in effect soon, the County will not be able to implement their pretreatment program adequately.</p>	403.5(c)(3); 403.12(o); 403.14	I.H
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources 	403.8(f)(3)	I.I

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources 		I.J.1&3
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness 		I.J.2
<ul style="list-style-type: none"> Integration of pollution prevention 		I.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		
None at this time		
SECTION III COMPLETED BY: Scott Mallery, PE TITLE: Pretreatment Engineer		DATE: 12/19/2012 TELEPHONE: (509) 329-3473

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE

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PRETREATMENT PROGRAM STATUS UPDATE

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

A. CA INFORMATION

1. CA name: Spokane County

2. a. Pretreatment contact:
Stela Matei-Rowley

b. Mailing address:
1026 W Broadway Ave.
Spokane, WA 99260-0430

c. Title: Pretreatment Engineer

d. Telephone number: (509) 477-7177

3. Date of last CA report to Approval Authority: April 30, 2012

4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?

Yes

No

no

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

Cadmium (SCRWRF for NPDES in Dec. 2011)

unknown

b. Has the treatment plant sludge violated these tests?

- EP toxicity
- TCLP

Yes

No

no

no

6. Does the treatment plant discharge to a 303(d) impaired waterbody?

If yes, list the pollutants of concern.

Total Phosphorus, CBOD5, Ammonia (the Spokane River is impaired for DO)

Yes

No

yes

7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed?

If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).

Yes

No

yes

There is a Dissolved Oxygen TMDL covering the water body (Spokane River) receiving flows from the Riverside Park Water Reclamation Facility (RPWRF) and the Spokane County Regional Water Reclamation Facility (SCRWRF).

The pollutants of concern are: Phosphorus, CBOD5, Ammonia (the river is impaired for DO). See NPDES permits WA-002447-3 (RPWRF) and WA-0093317 (SCRWRF) for details.

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

Last PCI	Last Audit	Program Report
Date: 6/7/10	Date: 6/16/08	Date: 4/30/12
X	X	
		X (MJA City/County)
	X	
	X	

2. Is the CA presently in RNC for any of these violations?

[illegible]

3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)

Name of SIU in SNC	Compliance Status	Source
NA		

4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.

SNC Evaluation Period	1/2011 to 12/2011
-----------------------	----------------------

0	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by: POTW 0 State 0
0	%	Self-monitoring requirements	
0	%	Pretreatment compliance schedules	

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

The County is transiting from the City of Spokane doing most of the managing of their permits to a contractor who is operating the County's new treatment plant. With this transition, the County and City need to update their MJA. The new MJA should be completed by end of January 2013.

ATTACHMENT A COMPLETED BY:

Scott Mallery, PE

TITLE: Pretreatment Engineer

DATE:

6/10/2012

TELEPHONE:

(509) 329-3473

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ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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PRETREATMENT PROGRAM PROFILE

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

A. CA INFORMATION

1. CA name Spokane County

2. Original pretreatment program submission date 11-10-98

3. Required frequency of reporting to Approval Authority Once a year – the annual report

4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
City of Spokane Riverside Park Water Reclamation Facility (RPWRF)	WA-002447-3	7/1/2011	6/30/2016
Spokane County Regional Water Reclamation Facility (SCRWRF)	WA-0093317	12/1/2011	11/30/2016

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

Yes

No

X

If yes, provide the following information.

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated (Monitored) Pollutants
City of Spokane Riverside Park Water Reclamation Facility (RPWRF)	State of WA Depart. of Ecology	6/23/11	6/30/16	CBOD5, TSS, Dissolved Oxygen, Total Residual Chlorine, Fecal Coliform, TN, NO3, NO2, NH3, Alkalinity, pH, TP, TRP, Total Recoverable Al, As, Cd, Cu, Pb, Zn, Hg, Ag, Total PCBs, 2,3,7,8 TCDDs, PBDE, Priority Pollutants, Biomonitoring
Spokane County Regional Water Reclamation Facility (SCRWRF)	State of WA Depart. of Ecology	11/29/11	11/30/16	CBOD5, TSS, Dissolved Oxygen, Total Residual Chlorine, Fecal Coliform, TN, NO3, NO2, NH3, Alkalinity, pH, TP, TRP, Total Recoverable Al, As, Cd, Cu, Pb, Zn, Hg, Ag, Total PCBs, 2,3,7,8 TCDDs, PBDE, Priority Pollutants, Biomonitoring

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? 4/1/2000

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

Date Approved	Name of Modification	Date Incorporated in NPDES Permit

PRETREATMENT PROGRAM PROFILE (Continued)

C. TREATMENT PLANT INFORMATION											
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.											
1. Treatment plant name City of Spokane Riverside Park Water Reclamation Facility (RPWRF) Spokane County Regional Water Reclamation Facility (SCRWRF)					2. Location address 4401 N Aubrey L. White Parkway, Spokane, WA 99205-3939 1004 N Freya Street, Spokane, WA 99202						
3. a. NPDES permit number WA-002447-3 WA-0093317		b. Expiration date 6/30/2016 11/30/2016		4. Treatment plant wastewater flows							
				Design		44 mgd 8.0 mgd		Actual 40.77 mgd 5.8 mgd			
5. Sewer System		a. Separate		%		b. Combined		%			
6. a. Industrial contribution (mgd)		b. Number of SIUs discharging to plant		c. Percent industrial flow to plant							
2011 (RPWRF) 0.574 2011 (SCRWRF) 0.056		2011 (RPWRF) 18 2011 (SCRWRF) 8		2011 (RPWRF) 1.41 2011 (SCRWRF) 0.97							
7. Level of treatment		Type of Process(es)									
a. Primary (RPWRF)		Fine screens, aerated grit collection, primary clarifiers and pilot chemically enhanced primary treatment									
a. Primary (SCRWRF)		Fine screens, aerated grit collection, chemically enhanced primary treatment									
b. Secondary (RPWRF)		Conventional activated sludge aeration basins, secondary clarifiers and seasonal alum addition for Phosphorus removal									
b. Secondary (SCRWRF)		Step-feed nitrification/denitrification aeration basins combined with ultrafiltration membrane bioreactors (MBR), using ferric chloride addition for odor control and Phosphorus removal									
c. Tertiary (RPWRF)		N/A									
c. Tertiary (SCRWRF)		MBR included with Secondary treatment process									
8. Indicate methods of sludge disposal. Note for 8.a. – RPWRF used Land application for biosolids Note for 8.g. – SCRWRF sent Class B biosolids to Barr-Tech who treated to Class A compost											
Quantity of sludge					Quantity of sludge						
a. Land application		6826 dry tons/year		e. Public distribution				dry tons/year			
b. Incineration				f. Lagoon storage				dry tons/year			
c. Monofill				g. Other (specify)		202		dry tons/year			
d. MSW landfill				Class B biosolids treated to Class A compost							
D. APPLICATION OF STANDARDS											
If there is more than one treatment plant, were local limits established specifically for each plant?						N/A		Yes		No	
										no	

PRETREATMENT PROGRAM PROFILE (Continued)

E. ADDITIONAL INFORMATION

The Riverside Park Water Reclamation Facility (RPWRF) operated for the entire year of 2011. Spokane County's wastewater flows were treated at RPWRF for the year of 2011 (and prior), except for 5.8 mgd (average daily flow) for the single month of December 2011.

The Spokane County Regional Water Reclamation Facility (SCRWRF) began operations on December 1, 2011, and treated 5.8 mgd (average daily flow) for the single month. The total wastewater flows for Spokane County's service area was approximately 9 mgd for December. Hence, approximately 3.2 mgd was treated at RPWRF for that single month.

ATTACHMENT B COMPLETED
BY:
Stela Matei-Rowley, PE
TITLE: Pretreatment Engineer

DATE: 6/10/2012

TELEPHONE:

ATTACHMENT C: LEGAL REVIEW CHECKLIST

Not Evaluated during this Audit. No Changes in the SOU.

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

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WENDB DATA ENTRY WORKSHEET

WENDB DATA ENTRY WORKSHEET																											
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.																											
CA name Spokane County																											
NPDES number WA-002447-3 and WA-0093317																											
Date of inspection June 12 and 13, 2012		Date entered into PCS																									
<ul style="list-style-type: none"> • Number of SIUs* <ul style="list-style-type: none"> - Number of SIUs without control mechanism - Number of SIUs not inspected or sampled - Number of SIUs in SNC** with standards or reporting - Number of SIUs in SNC with self-monitoring - Number of SIUs in SNC with self-monitoring and not inspected or sampled • Number of CIUs 	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">PCS Code</th> <th style="text-align: center;">Checklist Reference</th> <th style="text-align: center;">Data</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">SIUS</td><td style="text-align: center;">I.B.2.a</td><td style="text-align: center;">8</td></tr> <tr><td style="text-align: center;">NOCM</td><td style="text-align: center;">I.C.1.b</td><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">NOIN</td><td style="text-align: center;">I.E.2</td><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">PSNC</td><td style="text-align: center;">I.F.3.a</td><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">MSNC</td><td style="text-align: center;">I.F.3.a</td><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">SNIN</td><td style="text-align: center;">I.G.5</td><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">CIUS</td><td style="text-align: center;">I.B.2.a</td><td style="text-align: center;">6</td></tr> </tbody> </table>	PCS Code	Checklist Reference	Data	SIUS	I.B.2.a	8	NOCM	I.C.1.b	0	NOIN	I.E.2	0	PSNC	I.F.3.a	0	MSNC	I.F.3.a	0	SNIN	I.G.5	0	CIUS	I.B.2.a	6		
PCS Code	Checklist Reference	Data																									
SIUS	I.B.2.a	8																									
NOCM	I.C.1.b	0																									
NOIN	I.E.2	0																									
PSNC	I.F.3.a	0																									
MSNC	I.F.3.a	0																									
SNIN	I.G.5	0																									
CIUS	I.B.2.a	6																									
*The number of SIUs entered into PCS is based on the CA's definition of <i>Significant Industrial User</i> .																											
**As defined in EPA's 1986 <i>Pretreatment Compliance Monitoring and Enforcement Guidance</i> .																											

WENDB DATA ENTRY WORKSHEET	
COMPLETED BY: Scott Mallery, PE TITLE: Pretreatment Engineer	DATE: 12/19/2012 TELEPHONE: (509) 329-4373

PCA REQUIRED ICIS DATA ELEMENTS WORKSHEET

▶ TYPE OF COMPLIANCE MONITORING: PCA	
▶ NAME OF PRETREATMENT PROGRAM: Spokane County	
▶ CONTROLLING AUTHORITY NPDES ID: WA-002447-3 and WA-0093317	
START DATE OF INSPECTION June 12, 2012	▶ END DATE OF INSPECTION June 13, 2012
LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]): Scott Mallery, PE, Ecology, (509) 329-3473	
ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]): NA	

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
▶ SIUs*:	II.B.2.a	I.C.4.a	8
▶ SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	0
▶ SIUs Not Inspected:	II.E.2.c	I.F.2.c	0
▶ SIUs Not Sampled:	II.E.2.b	I.F.2.b	0
▶ SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	0
▶ SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	0
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	0
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	0
Criminal Suits Filed Against SIUs:	II.F.1		0
CATEGORICAL INDUSTRIAL USERS (CIUs)			
▶ CIUs:		I.C.4.a	6
OTHER INFORMATION			
Pass-Through/Interference Indicator <i>(none, Yes, or No)</i>		I.G.6	None
DEFICIENCIES			
Control Mechanism Deficiencies <i>(No or Yes)</i>		I.D.1;II.A.4	No
Inadequacy of Sampling and Inspections <i>(No or Yes)</i>		II.C and Site Visit Sheets	No
Adequacy of Pretreatment Resources <i>(Yes or No)</i>		I.I	Yes
FOOTNOTES:			
▶ denotes required information			
* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."			
** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.			

DATA ENTRY WORKSHEET COMPLETED BY: Scott Mallery, PE	DATE: 12/19/2012
TITLE: Pretreatment Engineer	TELEPHONE NO.: (509) 329-3473

RNC WORKSHEET

RNC WORKSHEET			
INSTRUCTIONS: Place a check in the appropriate box to the left, if the CA is found to be in RNC or SNC.			
CA name Spokane County			
NPDES number WA-002447-3 and WA-0093317			
Date of audit June 12 and 13, 2013			
		Level	Checklist Reference
	Failure to enforce against pass through and/or interference	I	I.G.6
	Failure to submit required reports within 30 days	I	Attach A.B.2.b
	Failure to meet compliance schedule milestone date within 90 days	I	Attach A.B.2.c
	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	I.D.1.c
	Failure to inspect or sample 80% of SIUs within the past 12 months	II	I.F.2.a
	Failure to enforce Pretreatment Standards and reporting requirements (more than 15% of SIUs in SNC)	II	II.D.1; I.G.2
Note 1	Other: Failure to have an updated adequate multijurisdictional agreement (MJA)	II	I.B.1&3
Note 2	Recommend: Development of Effective Data Management System	NA	I.H.
SNC			
Based off the worksheet, the Spokane County had only one Level II criterion and is in compliance for their pretreatment program.			
NA	CA in SNC for violation of any Level I criterion		
NA	CA in SNC for violation of two or more Level II criterion		
For more information on RNC, see EPA's 1990 <i>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</i>			

Note 1: The City of Spokane and Spokane County need a new multi-jurisdictional agreement (MJA) due to the fact that Spokane County has a new treatment plant. This MJA is needed for the County to fully implement their legal authority for their pretreatment program and receive final approval from Ecology of their pretreatment changes.

{NOTE: An updated MJA between the Spokane County and City of Spokane was executed on 12-11-2012 by the Spokane County and on 1-16-20 by the City of Spokane. This item is completed and is no longer an issue.}

Note 2: With the Spokane County hiring a contractor to run their pretreatment program, the City of Spokane's LINKO system will not be used by the County. Therefore, the County needs an effective data management system as soon as possible. If this system does not go in effect soon, the County will not be able to implement their pretreatment program adequately.

RNC WORKSHEET COMPLETED BY: Scott Mallery, PE TITLE: Pretreatment Engineer	DATE: 12/19/2012 TELEPHONE: (509) 329-3473
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