



## ANNUAL PRETREATMENT REPORT

NPDES Permit # WA0037061

Reporting Period:  
January 1, 2023, through December 31, 2023

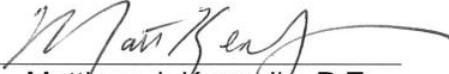
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I have personally examined and am familiar with the information submitted in this document and its attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted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

2/20/2024  
Date

  
Matthew J. Kennelly, P.E.  
Executive Director  
LOTT Clean Water Alliance

2023 Annual Pretreatment Report  
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# 2023 ANNUAL PRETREATMENT PROGRAM REPORT

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## **INTRODUCTION**

The LOTT Clean Water Alliance (LOTT) implements a pretreatment program via a multijurisdictional agreement with the cities of Lacey, Olympia, Tumwater, and Thurston County. Under this agreement, LOTT establishes discharge regulations, conducts industrial user (IU) surveys to identify IUs, determines the need for wastewater discharge permits, and conducts facility inspections to determine if IUs are complying with the partner's municipal code.

The LOTT Discharge and Industrial Pretreatment regulations are adopted in each partner's municipal code. When LOTT determines an IU is not in compliance, the partner jurisdiction follows up with enforcement under their municipal code. This report details pretreatment activities for 2023.

## **INDUSTRIAL USER SURVEY ACTIVITY**

LOTT surveys non-residential sewer users in Lacey, Olympia, and Tumwater as part of its National Pollutant Discharge Elimination System (NPDES) Permit requirements. Surveys identify businesses and organizations that may be subject to sewer ordinance regulations and help to characterize any pollutants discharged to the sewer system.

LOTT receives notices from partner jurisdictions about planned developments. This allows LOTT to notify potential business of pretreatment requirements. LOTT reviewed 67 proposed projects in 2023.

In addition to plan reviews, LOTT surveys existing facilities to determine their current waste practices. Approximately 46 industrial user surveys were mailed and received in 2023.

### **Automotive Survey Review**

LOTT reviewed and updated its industrial user database of automotive and vehicle repair facilities with information provided by Thurston County Environmental Health. Database updates led to the development of Best Management Practices for oil and water separator maintenance and spill prevention (Appendix One) and an informational handout (Appendix Two). LOTT intends to mail the handout to automotive and vehicle repair facilities in preparation for a 2024 inspection campaign.

## **INDUSTRIAL USER NOTIFICATION**

40 CFR 403.8(f)(2)(iii) requires Publicly Owned Treatment Works (POTW) to notify Industrial Users of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. There were no new federal pretreatment regulations that required industrial user notification in 2023.

## **INDUSTRIAL USER INSPECTIONS**

### **Permitted IU Inspections**

Wastewater discharge permits are issued to IUs and contain site-specific controls including discharge prohibitions, sampling, notification, and reporting requirements. IUs that are required to obtain permits either perform a specific regulated wastewater generating process, discharge

over 25,000 gallons of water per day, or have reasonable potential to harm the POTW. LOTT inspected and sampled all Significant Industrial Users in 2023.

<b>PERMITTED INDUSTRIAL USER FACILITY INSPECTIONS</b>			
<b>Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>	<b>Sample Date</b>
Pepsi NW Beverages	Tumwater	6/15/2023	6/16/2023
Georgia Pacific	Olympia	6/7/2023	6/7/2023
Crown Cork and Seal	Olympia	1/25/2023	9/7/2023
A&R Aviation Incorporated	Tumwater	8/7/2023	9/19/2023
International Paper	Lacey	10/5/2023	
Roy's Designs	Olympia	10/16/2023	-
J.R. Setina Manufacturing	Olympia	10/18/2023	-
American Benchmark Machine Works	Tumwater	10/20/2023	-
Earth Friendly Products	Lacey	10/24/2023	-
Thurston County Waste and Recovery Center	Lacey	12/12/2023	12/13/2023
Winsor Fireform	Tumwater	12/14/2023	-

### **Non-Permitted IU Inspections**

IUs that are not required to obtain discharge permits must still comply with the LOTT Discharge and Industrial Pretreatment Regulations. In addition to routine inspections of Food Service Establishments (FSEs) and Dental Offices, other non-permitted IUs are inspected. These inspections are conducted as follow-up to IU surveys, to determine if the facility is complying with the partner jurisdiction's municipal code, and to determine if a wastewater discharge permit is necessary. Below are the non-permitted IU inspections LOTT conducted in 2023.

<b>NON-PERMITTED INDUSTRIAL USER FACILITY INSPECTIONS</b>		
<b>Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Intercity Transit	Olympia	7/26/2023
Magic Kombucha	Olympia	10/30/2023
Ilk Beer	Olympia	12/19/2023

### **Dental Office Inspections**

In 2017, EPA promulgated a regulation commonly known as the Dental Rule. The Dental Rule requires dental offices to install and maintain dental amalgam separators, follow Best Management Practices, and submit reports to the local control authority verifying compliance. In 2021, LOTT received reports from all facilities subject to the Dental Rule. Facility inspections of dental offices began in 2022, and by the end of 2023 LOTT had inspected all non-exempt dental offices. The purpose of the inspections was to provide technical assistance to dental offices and to verify compliance with the Dental Rule.

These inspections included:

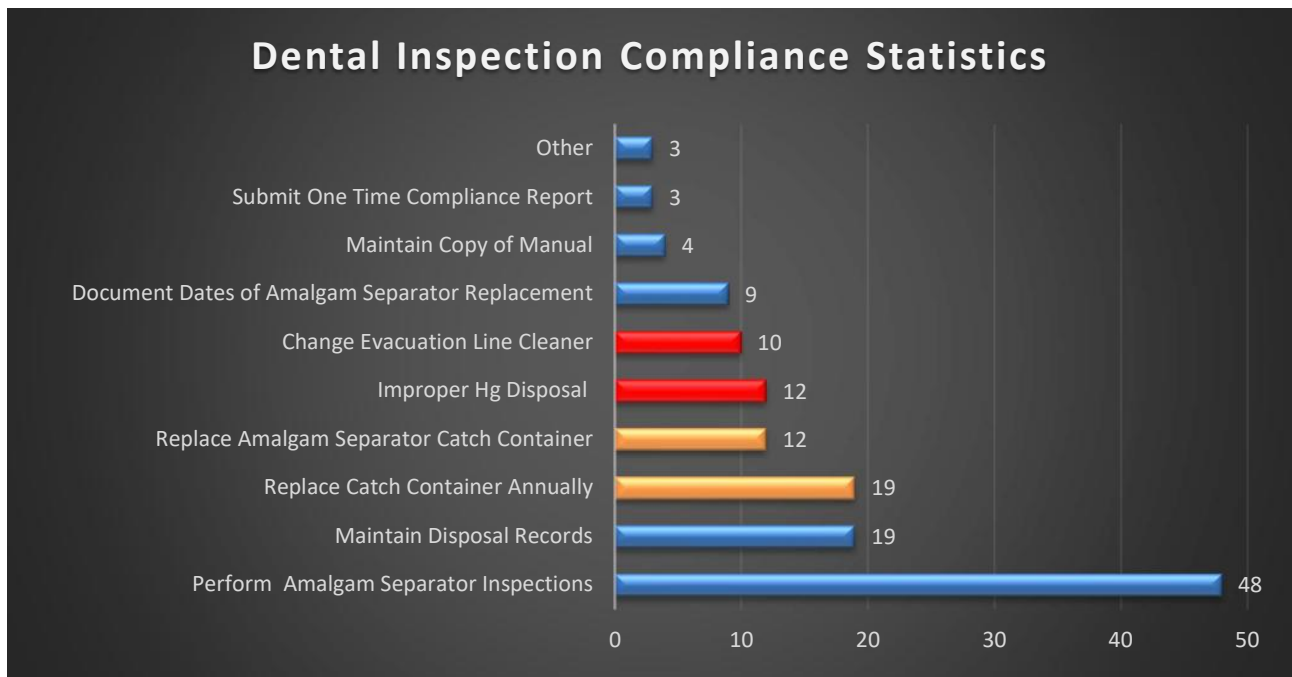
- Checking the condition of dental amalgam separators.
- Reviewing maintenance records.
- Verifying that scrap amalgam was not being disposed in the POTW.
- Verifying that compliant cleaning products were used.

All dental offices inspected had installed dental amalgam separators. Dental amalgam separators are sediment traps that catch amalgam sediment generated during the placement or removal of dental amalgam. The amalgam catch containers require regular replacement. Dental offices also use line cleaners to keep suction lines clear. Line

cleaners that contain bleach or peroxide or have a high or low pH are prohibited because they dissolve and discharge the mercury in the catch container.

Common deficiencies included lack of routine replacement of the catch containers, and failure to conduct and document self-inspections. If a dental office’s catch container needed to be replaced, or if a non-compliant line cleaner was being used the office was required to replace the container or change their line cleaner. Otherwise, the facility was informed of the self-inspection and record-keeping requirements in a follow-up letter.

The table below details deficiencies found during inspections conducted in 2022, and 2023. A full list of 2023 dental office inspections is included in Table One.



### Food Service Establishment (FSE) Inspections

LOTT conducts inspections of FSEs to ensure that they are properly maintaining their grease interceptors. During inspections, grease and sediment levels in the interceptor are checked, pumping records reviewed, and the FSE is required to clean the grease interceptor if the inspector determined it was necessary.

Criteria for determining if a grease interceptor needed to be cleaned include quantities of grease that exceed twenty five percent of the working volume, evidence of backups, excessive grease built up above the water level, and free-floating grease in the effluent. If the grease interceptor is missing parts such as baffles, then the business is required to repair the interceptor.

LOTT also receives reports from pumper companies detailing their cleaning activities. Pumper reports help to prioritize inspections by either identifying deficiencies that require follow up, or by

identifying businesses that are adequately cleaning their interceptor which makes them a lower priority for inspection.

LOTT conducted a total of 117 FSE inspections in 2023 and received approximately 221 pumper reports. Below are highlights of FSE inspections conducted in 2023. A full list of 2023 FSE inspections is included in Table Two.

### **School Inspections**

While schools are not for-profit businesses, they require oversight because they produce fats, oils, and grease (FOG) in amounts that may cause sewer blockages.

There are three school districts in the LOTT service area in addition to ten private schools. The school districts are North Thurston School District (primarily located in Lacey), Olympia School District, and Tumwater School District.

School inspections began in the fourth quarter of 2019. LOTT intended to inspect the North Thurston School District and Tumwater School District in 2020. However this effort was not completed due to the Covid 19 Pandemic. This inspection campaign resumed in 2023, and LOTT inspected North Thurston and Tumwater schools. The inspections showed that grease interceptors in both the North Thurston and Tumwater districts were being maintained properly.

### **Routine Inspections**

#### **Port Taco Truck and Catina**

On January 5, 2023, LOTT conducted an inspection of Port Taco Truck and Cantina. The inspection revealed that the second chamber of the grease interceptor had not been pumped when the grease interceptor was last cleaned. LOTT contacted the grease pumping company that performed the work and notified them of the discrepancy. The pumping company immediately returned and pumped out the second chamber of the interceptor.



*Port Taco Truck and Cantina  
Grease interceptor first chamber.*



*Port Taco Truck and Cantina  
Grease interceptor second chamber.*



## International House of Pancakes

On January 6, 2023, LOTT conducted an inspection of International House of Pancakes (IHOP) at 3519 Martin Way. This was a follow up inspection to determine if the final chamber of their grease interceptor was still backing up with domestic sewage. The inspection revealed that the second chamber of the grease interceptor had domestic waste inside and showed signs of backups. IHOP was required to investigate the cause of the issue. IHOP jet cleaned all the lines inside the restaurant and established a regular grease interceptor cleaning frequency.

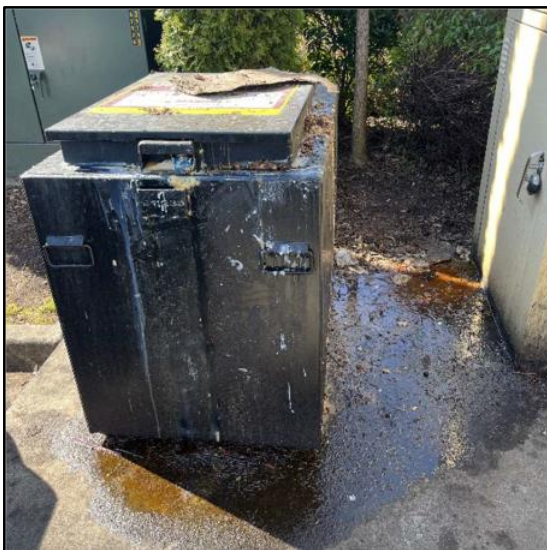
## Buffalo Wild Wings

LOTT conducted an inspection of Buffalo Wild Wings on May 22, 2023, in response to an employee referral of oil being poured down the drain. It was revealed that their oil recycling system which pumped oil to storage bins was broken. The exterior fryer grease bins were also overflowing onto the ground. The manager explained that the issue was due to an oil recycling company not picking up the waste. LOTT referred the oil spill to City of Olympia Stormwater staff.

A follow up inspection conducted on May 23, 2023, verified that the oil recycling system had been repaired, the exterior oil drum was removed, and the sidewalk was cleaned.



*IHOP  
Domestic waste in interceptor.*



*Buffalo Wild Wings grease barrel.*



*Buffalo Wild Wings cleaned sidewalk.*

## PARTNER/INTERAGENCY COLLABORATIONS

### Partner Referrals

At the request of partner jurisdictions, LOTT conducted inspections of FSEs where problems were noted in the collection system. LOTT conducted 15 FSE inspections in 2023 in response to partner referrals.

### Super Buffet

LOTT received a referral from City of Lacey on February 23, 2023, regarding an excessive amount of grease in the lift station downstream from Super Buffet. LOTT conducted an inspection on March 1, 2023. The inspection revealed that the interceptor was overdue for cleaning and had not been pumped out in over a year and a half. Super Buffet was required to pump out the grease interceptor and implement a six-month cleaning frequency.



*Core sample first compartment*



*Inlet baffle first compartment*

### Inter City Transit

LOTT received a referral from City of Olympia Fire Department on July 26, 2023, stating that Intercity Transit had a spill of approximately one thousand gallons of Diesel Exhaust Fluid (DEF). LOTT conducted an inspection that same day. The inspection revealed that the volume of material spilled was overestimated. Intercity Transit has two 1000-gallon tanks of DEF fluid, and one tank leaked because a valve broke at the bottom of the tank. Based on the size of the storage tanks and the amount of material left in the tanks it was estimated that 300-400 gallons spilled. The spilled material discharged to a 1500-gallon oil and water separator. Intercity Transit temporarily shut down their vehicle wash bays. With the wash bays shut down, the separator functioned as secondary containment. Intercity Transit hired a pumping company to pump out all contents of the oil and water separator.

## Safeway

LOTT received a referral from City of Lacey on March 13, 2023, regarding a grease interceptor overflow at Safeway 1243 Marvin Rd. NE. LOTT conducted an inspection on March 14, 2023, to check the condition of the grease interceptor. The inspection revealed that the grease interceptor had a partial blockage in a pipe joining two chambers. Safeway was required to clear the blockage, and regularly maintain the grease interceptor.



*Grease interceptor overflow on March 13, 2023*



*Blocked pipe between first and second chamber*

## Earthbound Productions

LOTT received a referral from City of Olympia on August 31, 2023, regarding a sanitary sewer overflow that occurred in the alley behind 406 Water St. LOTT conducted several inspections and determined that the mobile food truck located onsite was disposing of wastewater in a sink that did not have a grease interceptor. The property owner was notified that they needed to prohibit the food trucks from discharging in the mop sink or install a grease interceptor. The property owner elected to prohibit access.



*Sewage overflow in alley*

## Joint Inspections

LOTT conducts joint inspections of IUs with representatives from its partner jurisdictions. Joint inspections may be conducted with designated partner contacts, building officials, health inspectors, collection system operators, water resource specialists, or storm water inspectors. There are several reasons and benefits to conducting joint inspections:

- Reinforces working relationships between LOTT and partner jurisdictions.
- Demonstrates to the facility being inspected that LOTT and its partners work together.
- Educates partners about the pretreatment program, and vice versa.

Below are highlights from joint inspections LOTT conducted in 2023. A full list is included in Table Three.

### Joint inspections with City of Olympia Stormwater Staff.

City of Olympia Stormwater interns accompanied LOTT on two FSE inspections to learn about LOTT's Source Control Program.

### Joint inspections with the Department of Ecology

Washington Department of Ecology inspectors with the Hazardous Waste and Toxics Reduction division accompanied LOTT on four inspections of permitted industrial users and one FSE inspection. The joint inspections were conducted for knowledge sharing between agencies.

### Joint inspections with Thurston County Dental

Thurston County implemented a dental outreach campaign in 2023. Their campaign focused on proper disposal of hazardous materials generated during dental procedures that were not discharged to the dental amalgam separator. During inspections, LOTT staff discussed proper maintenance of dental amalgam separators and Thurston County staff discussed proper disposal of mercury and other non-sewered wastes. A total of thirty-one joint inspections were conducted.

### Joint inspections with Thurston County Health Inspectors

LOTT began conducting pre-opening inspections of FSEs with Thurston County Health Inspectors. LOTT receives notification from Thurston County when a new business opens, or an existing business changes ownership. During the inspection, LOTT required business owners to complete an Industrial User survey while LOTT inspectors checked the grease interceptor. A total of thirteen joint inspections were conducted.

## INDUSTRIAL USER CHANGES

### Wastewater Discharge Permits Renewed in 2023

INDUSTRY	TYPE	STATUS	LOCATION	DATE RENEWED
Winsor Fireform	Porcelain Enameller	NSCIU	Tumwater	11/31/2023

**Wastewater Discharge Permits Cancelled in 2023**

INDUSTRY	TYPE	STATUS	LOCATION	DATE CANCELLED
Roy's Designs	Metal Finisher	MIU	Olympia	10/24/2023

**Roy's Designs**

Roy's Designs was permitted as an NSCIU because they performed the core metal finishing process of phosphate coating. Roy's Designs determined that phosphate coating was not required to powder coat their products and removed all phosphate coating chemicals. LOTT conducted an inspection on October 16, 2023, and verified that the chemicals had been removed. Afterwards, the permit was cancelled by the City of Olympia and LOTT. Roy's Designs was notified that they are still required to complete periodic IU Surveys and to allow LOTT onsite to conduct facility inspections to verify that metal finishing has not resumed.



*Empty Phosphatizing Tanks*

**New Wastewater Discharge Permits Issued in 2023**

INDUSTRY	TYPE	STATUS	LOCATION	DATE ISSUED
Whole Foods Distribution Center	Refrigerated Warehouse	MIU	Lacey	8/1/2023

**Whole Foods Distribution Center**

The City of Lacey issued a Wastewater Discharge Permit to Whole Foods Distribution Center (Whole Foods) on August 1, 2023.

Whole Foods operates a refrigerated distribution warehouse in the Hawks Prairie area of Lacey. The refrigerated warehouse storage facility receives and ships full, unopened cases of various produce and meat items. Process wastewater consists of wastewater generated from floor cleaning.

Whole Foods uses anhydrous ammonia, a colorless, liquefied gas, as a refrigerant. Whole Foods stores 6,700 pounds of gas onsite. To prevent accidental releases of ammonia to the atmosphere, Whole Foods uses a diffusion tank. In the event of an accidental release, the

gaseous ammonia is piped to the diffusion tank where the gas is entrained in water. The byproduct of this process is a solution of ammonium hydroxide which is a toxic, corrosive hazardous waste.

The diffusion tank does not have secondary containment and is located next to several floor drains that discharge to the POTW. Because of the potential for an accidental discharge to the POTW, and the consequences of such a discharge, LOTT required Whole Foods to complete a wastewater discharge permit application. After reviewing the application, it was determined that a permit was necessary to administer a slug discharge control plan.

A wastewater discharge permit was issued on August 1, 2023. The permit requires Whole Foods to implement a slug discharge control plan, and install spill prevention measures such as secondary containment, or elimination of the potential for discharge.

Whole Foods has been complying with the permit requirements to eliminate the potential for discharge or implement spill prevention measures. Whole Foods submitted a proposal to permanently seal floor drains located near the ammonia diffusion tank and eliminate the potential for discharge. Their proposal was approved and Whole Foods is moving forward with sealing the drains.

#### INDUSTRIAL USER MONITORING SCHEDULE

Permittee	POTW Sampling Frequency			Inspection Frequency	
	Performed 2023	Planned 2024	Split Sampling?	Performed 2023	Planned 2024
A&R Aviation	1	1	Not performed	1	1
American Benchmark Machine Works	0	0	Not performed	1	1
Crown Cork & Seal Company	1	1	Not performed	1	1
Earth Friendly Products	0	0	Not performed	1	1
Georgia-Pacific Corrugated	1	1	Not performed	1	1
International Paper Company, LLC	1	1	Not performed	1	1
J. R. Setina Manufacturing Company, Inc.	0	0	Not performed	1	1
Pepsi Northwest Beverages, LLC	1	1	Not performed	1	1
Port of Olympia	0	0	Not performed	0	1
Roy's Designs, Inc.	0	0	Not performed	1	1
Thurston County Waste & Recovery Center	1	1	Not performed	1	1

Permittee	POTW Sampling Frequency			Inspection Frequency	
	Performed 2023	Planned 2024	Split Sampling?	Performed 2023	Planned 2024
Whole Foods	0	0	Not performed	0	1
Winsor Fireform, LLC	0	0	Not performed	1	1

## ENFORCEMENT ACTIVITY

The following section details 2023 compliance and enforcement activity. The table below lists the industrial users (permitted and unpermitted) that required enforcement activity in 2023. Results of permitted industrial users monitoring and significant non-compliance (SNC) review are included in pages 8.1 – 8.9. No IUs were in SNC for this reporting period.

Industrial User	Address	Jurisdiction	Date and Violation	Enforcement Action
International Paper	7727 Union Mills Rd SE	Lacey	1/12/2023 Section 2.2 of Permit LA-003	LOTT issued a Verbal Warning on 2/14/2023.
Safeway Store 1173	1243 Marvin Rd NE	Lacey	3/13/2023 Section 3.2 (E) of the LOTT Regulations	LOTT issued a Letter of Violation on 3/21/2023.
International Paper	7727 Union Mills Rd SE	Lacey	2/1 to 2/8/2023 Section 2.1 of Permit LA-003	LOTT issued a Verbal Warning on 3/22/2023.
International Paper	7727 Union Mills Rd SE	Lacey	March 1,3,10,13,20,27 and 28, 2023. Section 2.1 of Permit LA-003 (flow) March 7,8,13,15,16,17,20,21,22,23, and 24, 2022 (pH)	LOTT issued a Letter of Violation on 4/13/2023.
Crown Cork and Seal	1202 Fones Rd SE	Olympia	8/15/2023 Section 2.1 of Permit OL-002	LOTT issued a Verbal Warning on 9/22/2023.
Earthbound Productions	406 Water St. SW	Olympia	6/26/2023 Section 13.20.050(B)(3) of the Olympia Municipal Code	LOTT issued a Letter of Violation on 9/26/2023.
Earth Friendly Products	8735 Commerce Place Dr. NE #A	Lacey	10/24/2023 Part 1 of Permit LA-015	LOTT issued a Verbal Warning on 11/21/2023.
International Paper	7727 Union Mills Rd SE	Lacey	11/1/2022, 12/2/2022, 1/6/2023, and 3/7/2023 Section 2.1 of Permit LA-003	LOTT issued a Verbal Warning on 12/12/2023.
Thurston County Waste and Recovery Center	2148 Hogum Bay Rd. NE	Lacey	12/15/2023 Section 2.2 of Permit LA-004	LOTT issued a Verbal Warning on 12/18/2023.

Industrial User	Address	Jurisdiction	Date and Violation	Enforcement Action
El Sarape	4043 Martin Way E	Olympia	10/31/2023 Section 13.20.050(B)(3) of the Olympia Municipal Code	LOTT issued a Letter of Violation on 1/24/2024.

### International Paper

International Paper was issued a verbal warning on February 14, 2023, for failure to submit self-monitoring results for biological oxygen demand (BOD). The submitted samples were invalid because they were analyzed past the holding time. Subsequent BOD results have been submitted within the allowable holding time.

### Safeway Store 1173

Safeway was issued a Letter of Violation on March 21, 2023, for failure to maintain a grease interceptor. On March 13, 2023, their grease interceptor overflowed and discharged grease to the surface. Safeway was required to pump the grease interceptor. At that time, a blockage was identified between the two chambers. Safeway was required to clear the blockage and a cleaning frequency was mandated.

### International Paper

International Paper was issued a verbal warning on March 22, 2023, for failure to monitor effluent flow from February 1 to February 8, 2023. International Paper notified LOTT of the violation prior to submitting its March discharge monitoring report. The violation was a result of readings not being recorded. International Paper implemented corrective actions including having two people oversee effluent readings for permit compliance.

### International Paper

International Paper received a Letter of Violation from LOTT on April 13, 2023, for failure to monitor effluent flow and pH on March 1,3,10,13,20,27 and 28, 2023 (dates flow was not monitored), and March 7,8,13,15,16,17,20,21,22,23, and 24, 2023 (dates pH was not monitored). International Paper implemented a new log requiring the operator to submit meter reads to their supervisor. International Paper disciplined and retrained the operator, while also providing training for a backup operator. Monitoring reports since then have contained flow and pH readings.

### Crown Cork and Seal

Crown Cork and Seal was issued a verbal warning on September 22, 2023, for failure to submit self-monitoring results for Cyanide. The samples submitted were invalid because they were analyzed past the holding time. LOTT recommended that self-monitoring samples be collected early in the reporting period to allow time to resample in the event of a laboratory error.

### Earthbound Productions

Earthbound Productions was issued a Letter of Violation on September 26, 2023, for discharge of a solid or viscous substance that caused a blockage. It was determined that mobile food



trucks were discharging to a mop sink inside the building at 406 Water St. Since the facility is not a food service establishment it does not have a grease interceptor. The property owner was notified that they needed to prohibit the food trucks from discharging in the mop sink or install a grease interceptor. The property owner elected to prohibit access.

### **Earth Friendly Products**

Earth Friendly Products was issued a verbal warning on November 21, 2023, for discharge of process wastewater from their quality control laboratory. Earth Friendly Products was required to divert all laboratory wastewater to their onsite holding tank and have it hauled offsite along with other detergent wastewater. In response, Earth Friendly Products disconnected the laboratory sink and the wastewater is now collected in a five-gallon bucket and hauled offsite.

### **International Paper**

International Paper was issued a verbal warning on December 12, 2023, for failure to monitor their effluent for oil and grease and total petroleum hydrocarbons on November 11, 2022, December 2, 2022, January 6, 2023, and March 7, 2023. Lab results submitted since March 2023, have been on time and in compliance.

### **Thurston County Waste and Recovery Center**

Thurston County Waste and Recovery Center was issued a verbal warning on December 18, 2023, for failure to submit results for mercury in their November Discharge Monitoring Report. The sample collected was invalid because it was analyzed outside of the allowable holding time.

### **El Sarape**

El Sarape was issued a Letter of Violation on January 24, 2024, for discharge of a solid or viscous substance in amounts that caused a blockage. An inspection conducted by LOTT on November 3, 2023, verified that El Sarape performed sufficient corrective action by cleaning their sewer lateral of grease accumulations. Dye testing during that inspection verified that all grease production fixtures were connected to the grease interceptor.

### **POTW INTERFERENCE OR PROBLEMS**

There were no instances of POTW interference or operational problems that were directly related to discharges from industrial users.

## RESOURCE SUMMARY

Environmental Compliance Budget (minus funds budgeted primarily for the Biosolids Management Program and Water Quality Laboratory)

LINE ITEM	BUDGETED	
	2023	2024
Salaries	\$ 213,566	\$ 210,876
Benefits	\$ 92,095	\$ 88,944
Operating Supplies, Small Tools & Equip, Safety Equip, & Specialty Materials	\$ 8,500	\$ 8,500
Clothing	\$ 1,600	\$ 1,340
Books & Manuals	\$ 400	\$ 200
Office Equipment	\$ 2,500	\$ 2,500
Professional Services	\$ 10,000	\$ 10,000
Mobile Phones	\$ 250	\$ 200
Per Diem, Lodging, Mileage, Airfare, & Parking	\$ 2,050	\$ 2,050
Advertising	\$ 600	\$ 600
Training Registration & Certification Fees	\$ 1,500	\$ 1,500
Printing & Binding	\$ 500	\$ 500
Postage	\$ 400	\$ 400
<b>TOTAL</b>	<b>\$333,461</b>	<b>\$ 327,610</b>

Funds to conduct the Pretreatment Program are supplied through the Environmental Compliance Department Budget. With the exception of Salaries and Benefits, the amounts listed above are those available primarily to operate the Pretreatment Program.

\* At least 60% of the Salaries and Benefits line items are dedicated to the Pretreatment Program.

All revenue associated with permitted industries, including excess strength surcharges, permit fees, fines and penalties are received from each Partner jurisdiction as LOTT general sewer revenue.

## PROGRAM CHANGES

### Minor Modifications to the Pretreatment Program 2023

No minor program modifications were made in 2022.

### Substantial Modifications to the Pretreatment Program 2023

No major program modifications were made in 2023.

### Proposed Minor Modifications to the Pretreatment Program 2024

The following changes LOTT intends to make in 2024 will require department of Ecology approval as a minor program modification.

### Pretreatment Program Manual Enforcement Response Plan

Once approved by the LOTT Technical Sub Committee the revised Enforcement Response Plan will be submitted to Ecology as a minor program modification.

## **Automotive Best Management Practices**

LOTT's Automotive Best Management Practices are submitted to Ecology with this annual report as minor program modifications.

## **Proposed Substantial Modifications to the Pretreatment Program 2024**

### **Ordinance Revisions**

In 2017, draft revisions were made to the LOTT Discharge and Industrial Pretreatment Regulations to establish a molybdenum local limit, add requirements to install and maintain grease interceptors, and correct inconsistencies/typos. LOTT's legal counsel and management reviewed and approved the revisions internally. The revisions were reviewed and approved by the LOTT Technical Sub-Committee and were reviewed by partner jurisdiction's legal staff in 2019.

Legal review identified several concerns in the current ordinance unrelated to the proposed revisions. The concerns are regarding criminal penalties exceeding amounts allowed by state law. LOTT drafted proposed language to address these concerns in 2022. The draft revisions have been submitted to the Technical Subcommittee for review and are now under legal review from all partners. If legal review does not identify any other issues, then the revisions may move forward to adoption by the LOTT Board.

A proposed change involves elimination of conflicting discharge limits in the local limits and prohibited discharge standards. The total petroleum hydrocarbon and oil and grease limit of 50 mg/L, and 300 mg/L (respectively) will be removed leaving the prohibited discharge limits of 100 mg/L and 300 mg/L as the remaining limit. Because this results in relaxation of a local limit, procedures for substantial modifications may need to be followed.

### **ORDINANCE AND RESOLUTION**

No ordinances were passed during the 2023 reporting period.

**TABLE ONE**

<b>DENTAL OFFICE INSPECTIONS</b>		
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Lemon Family Dentistry	Olympia	1/12/2023
Attila Talaber DMD	Olympia	1/19/2023
Patrick L Ward DDS	Olympia	1/20/2023
Impressions Dentistry	Olympia	2/9/2023
Woodland Trails Dentistry	Olympia	2/22/2023
John Walker DDS	Olympia	2/24/2023
Mikael Kautsky DDS	Olympia	2/27/2023
Brian K Rounds DDS	Lacey	3/14/2023
Light Dental Studios of Lacey	Lacey	3/29/2023
Lacey Family Dental	Lacey	4/4/2023
Olympia Advanced Dentistry	Olympia	4/5/2023
Lee J Edwards DDS	Lacey	4/11/2023
Pacific Dental Center	Lacey	4/12/2023
Kevin D Fedak DDS	Lacey	4/18/2023
Herbert E Todd DDS PLLC Family Dentistry	Lacey	4/24/2023
Garret M Yamaguchi DDS	Tumwater	5/2/2023
Sagawa Northwest Dentistry	Olympia	5/15/2023
Dental Care By Design	Lacey	5/16/2023
John Walker DDS	Olympia	5/22/2023
Bright Now Dental	Olympia	5/30/2023
Peterson & Cammack Family Dentistry	Lacey	5/31/2023
Kenneth Hancock DDS PLLC	Olympia	6/14/2023
Mikkelson Family Dentistry	Olympia	6/15/2023
Light Dental Studios	Lacey	6/28/2023
Olympia Family Dental	Olympia	7/10/2023
Kamkar Family & Gentle Dentistry	Olympia	7/10/2023
Family Dentistry at Hawks Prairie	Lacey	7/12/2023
Luck Dental Group	Olympia	7/18/2023
Thurston Dental	Olympia	7/26/2023
Stephen L Kirkpatrick DDS PLLC	Olympia	7/31/2023
Dental Care of Lacey	Lacey	8/17/2023
Reflection Dentistry	Tumwater	8/24/2023
McDonald Dentistry	Olympia	8/29/2023
A Agustin Vega DDS	Olympia	8/29/2023
Sunrise Dental of Olympia	Olympia	8/30/2023
Olympia Endodontic Group	Olympia	9/5/2023
Stillwater Dental	Olympia	9/7/2023
Prosthetic Dentistry of Olympia	Olympia	9/12/2023
Sunde Family Dental	Olympia	10/3/2023
Northwest Endodontics Specialist	Olympia	10/5/2023

**TABLE ONE CONTINUED**

<b>DENTAL OFFICE INSPECTIONS</b>		
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Janssen Dental	Olympia	10/12/2023
Fisher Jones Family Dentistry	Olympia	10/16/2023
Westside Dental	Olympia	10/17/2023
Northwest Center for Prosthodontics	Olympia	10/23/2023
Light Dental Studios of Olympia	Olympia	10/24/2023
Cooper Point Dental	Olympia	10/24/2023
Sea Mar Dental Clinic	Olympia	11/2/2023
Tumwater Family Dentistry	Tumwater	11/16/2023
Trosper Dental Care	Tumwater	11/16/2023
Affordable Family Dental	Tumwater	11/22/2023
NW Smiles	Lacey	11/29/2023
Safe Harbor Dental	Tumwater	11/30/2023
South Puget Sound Community College	Olympia	12/5/2023

**TABLE TWO**

<b>FOOD SERVICE ESTABLISHMENT INSPECTIONS</b>		
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Port Taco Truck & Cantina	Lacey	1/5/2023
IHOP Restaurant	Olympia	1/6/2023
Don Garcia's Mexican Restaurant	Lacey	1/10/2023
East Olympia Food Co-Op	Olympia	1/17/2023
Eight Arms Community Bakery	Olympia	1/18/2023
Dirty Dave's Pizza Parlor	Olympia	1/24/2023
Emperor's Palace	Lacey	1/25/2023
Hash	Olympia	1/30/2023
Jimmy John's	Olympia	1/31/2023
O'Malley's At Westside Lanes	Olympia	2/7/2023
River's Edge	Tumwater	2/14/2023
Huicholitos Mexican Food	Olympia	2/15/2023
Fish Tale Brew Pub	Olympia	2/16/2023
Bittersweet Chocolates	Olympia	2/21/2023
Outback Steakhouse	Olympia	2/23/2023
Super Buffet	Lacey	3/1/2023
Nori Sushi and Teriyaki	Olympia	3/2/2023
Kamakura Japanese Cuisine	Lacey	3/7/2023
Kobo Teriyaki Restaurant	Lacey	3/7/2023
Wendy's	Olympia	3/8/2023
Fish Tale Brew Pub	Olympia	3/10/2023
Safeway #1173 Marvin	Lacey	3/14/2023
Safeway #1173 Marvin	Lacey	3/15/2023
Buffalo Wild Wings	Olympia	3/22/2023
Walmart Neighborhood Market #4757	Lacey	4/5/2023
Boulevard Tavern	Olympia	4/11/2023
Taco Bell	Olympia	4/11/2023
Evergreen State College	Olympia	4/12/2023
The Brick On Tropsen	Tumwater	4/13/2023
Mod Pizza	Olympia	4/13/2023
Embers Restaurant	Olympia	4/19/2023
KFC	Tumwater	4/19/2023
IHOP Restaurant	Olympia	4/19/2023
Seventeen 51 Restaurant & Bistro	Lacey	4/20/2023
Haggen Foods	Olympia	4/25/2023
Mc Donald's 93rd Ave Tumwater	Tumwater	4/26/2023
Mc Donald's Capitol Blvd Tumwater	Tumwater	4/26/2023
Mc Donald's Sleater Kinney Lacey	Lacey	4/26/2023

**TABLE TWO CONTINUED**

<b>FOOD SERVICE ESTABLISHMENT INSPECTIONS</b>		
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Row	Olympia	4/27/2023
Left Bank Pastry	Olympia	4/27/2023
Revel Lacey/Lacey Senior LLC	Lacey	5/2/2023
Vic's Pizzeria, LLC	Olympia	5/3/2023
O'Blarney's Irish Pub Restaurant	Olympia	5/3/2023
Carl's Jr	Lacey	5/4/2023
Carl's Jr	Lacey	5/8/2023
Revel Lacey/Lacey Senior LLC	Lacey	5/10/2023
Carl's Jr	Lacey	5/11/2023
Fatso's Bar & Grill	Olympia	5/18/2023
Buffalo Wild Wings	Olympia	5/23/2023
Applebee's Neighborhood Grill (Capital Mall)	Olympia	5/25/2023
Mc Donald's Pacific Ave Lacey	Lacey	5/30/2023
Revel Lacey/Lacey Senior LLC	Lacey	6/1/2023
Kamakura Japanese Cuisine	Lacey	6/2/2023
Mc Donald's Plum St Olympia	Olympia	6/8/2023
Wendy's	Olympia	6/8/2023
Octapas Cafe	Olympia	6/14/2023
Denny's	Tumwater	6/14/2023
Lemongrass Restaurant & Lounge Lacey	Tumwater	6/20/2023
Mc Donald's Whitman Lane Lacey	Lacey	6/22/2023
Taqueria La Esquinta	Olympia	6/28/2023
Smash N Burgers	Olympia	6/28/2023
BBQ Junkies	Olympia	6/28/2023
777ish	Olympia	6/28/2023
Aspire Middle School	Lacey	6/29/2023
Chambers Prairie Elementary	Lacey	6/29/2023
Envision Career Academy	Lacey	7/11/2023
Chinook Middle School	Lacey	7/11/2023
Woodland Elementary School	Lacey	7/13/2023
Lacey Elementary School	Lacey	7/13/2023
North Thurston High School	Lacey	7/18/2023
Horizons Elementary School	Lacey	7/18/2023
North Thurston Special Education	Lacey	7/18/2023
Lakes Elementary School	Lacey	7/18/2023
Mountain View Elementary School	Lacey	7/18/2023
Pleasant Glade Elementary School	Lacey	7/18/2023
Timberline Sr High School	Lacey	7/19/2023
Salish Middle School	Lacey	7/20/2023
Seven Oaks Elementary School	Lacey	7/20/2023

**TABLE TWO CONTINUED**

<b>FOOD SERVICE ESTABLISHMENT INSPECTIONS</b>		
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Evergreen Forest Elementary	Lacey	7/20/2023
Arco AM/PM 7035	Olympia	7/25/2023
Safeway #1173 Marvin	Lacey	8/8/2023
Capital Mall - East side	Olympia	8/17/2023
Capital Mall - West side	Olympia	8/17/2023
Chipotle	Lacey	8/18/2023
Nicole's Bar	Olympia	8/18/2023
Lemongrass Restaurant & Lounge Lacey	Lacey	8/23/2023
Michael T Simmons Elem School	Tumwater	9/19/2023
Peter G Schmidt Elem School	Tumwater	9/21/2023
Tumwater Hill Elementary School	Tumwater	9/21/2023
Bacco Trattoria Italiana	Lacey	9/21/2023
A G West Black Hills High School	Tumwater	9/26/2023
Tumwater High School	Tumwater	9/27/2023
Fresh Pho and Ding Tea	Lacey	9/28/2023
Casa Catrina	Olympia	9/28/2023
Super Buffet	Lacey	9/29/2023
Canna Cabana	Lacey	9/29/2023
The Mark	Olympia	10/3/2023
Earthbound Productions	Olympia	10/3/2023
New Market Skills Center	Tumwater	10/4/2023
Tumwater Middle School	Tumwater	10/9/2023
G. W. Bush Middle School	Tumwater	10/10/2023
Pizza Hut	Tumwater	10/19/2023
Mc Donald's Whitman Lane	Lacey	10/19/2023
Pizza Hut	Tumwater	10/20/2023
Mc Donald's Whitman Lane	Lacey	10/26/2023
El Sarape	Olympia	10/31/2023
El Sarape II	Olympia	11/2/2023
El Sarape	Olympia	11/3/2023
Carter Pizza CO LLC, dba Vics Pizza East Side	Olympia	11/17/2023
Jimmy John's	Lacey	11/17/2023
Pho & Baguette	Tumwater	11/20/2023
Streets of Singapore	Olympia	11/21/2023
Pizza Hut	Tumwater	12/7/2023
Equal Latin	Olympia	12/18/2023
Capital Mall - East side	Olympia	12/27/2023
Fresh Pho & Ding Tea	Lacey	12/28/2023
Mena	Tumwater	12/28/2023



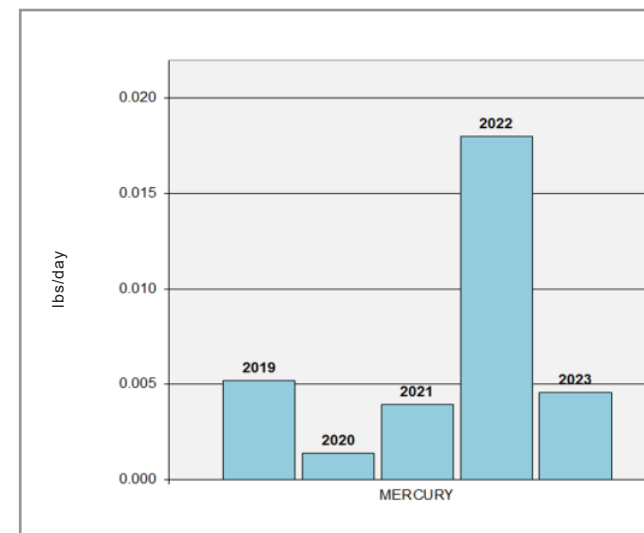
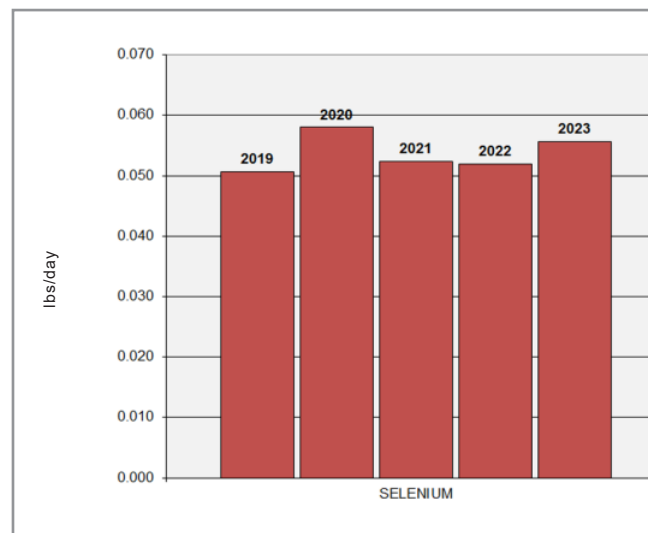
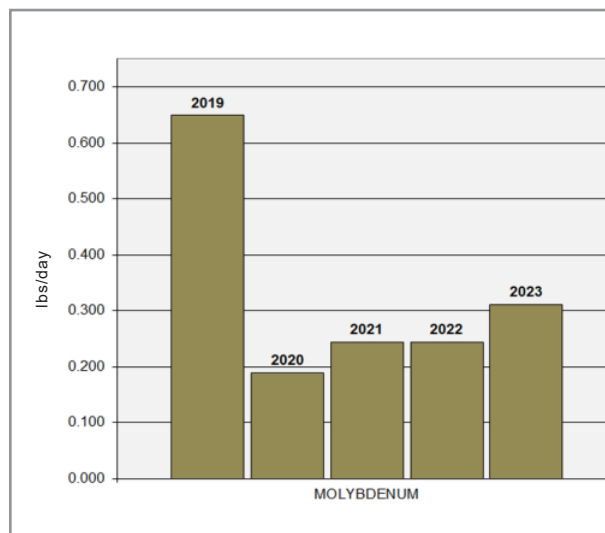
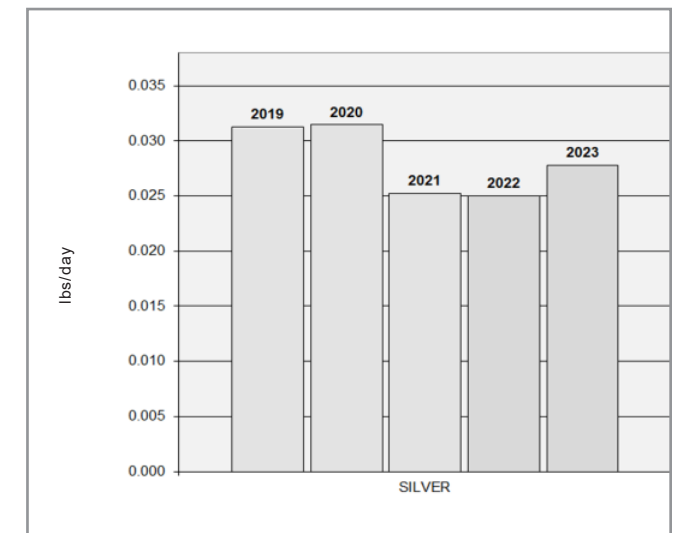
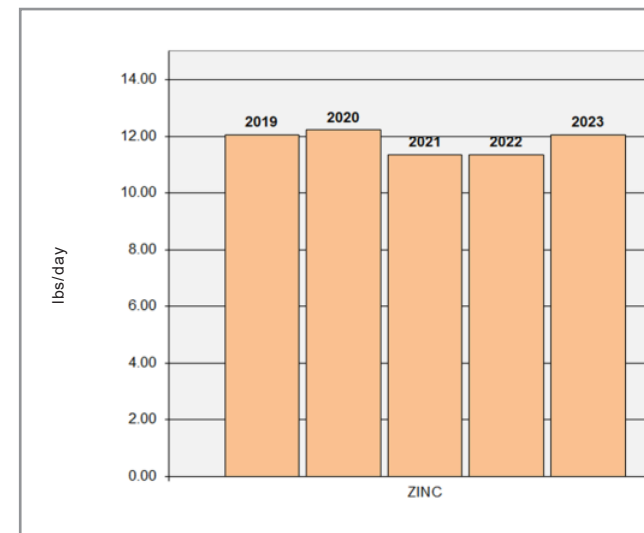
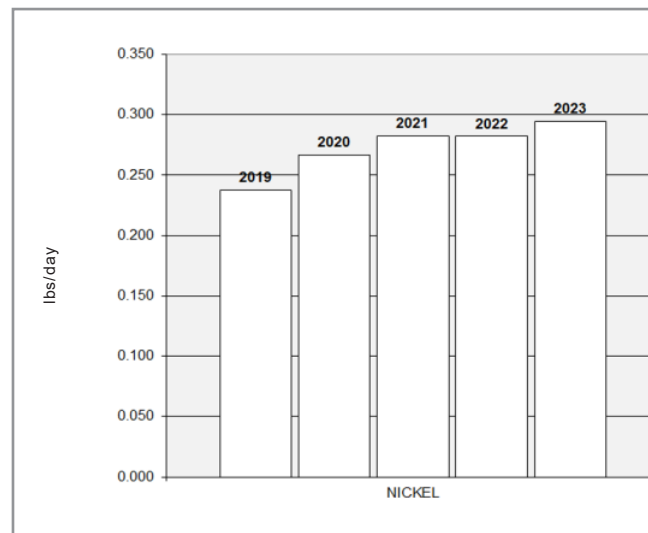
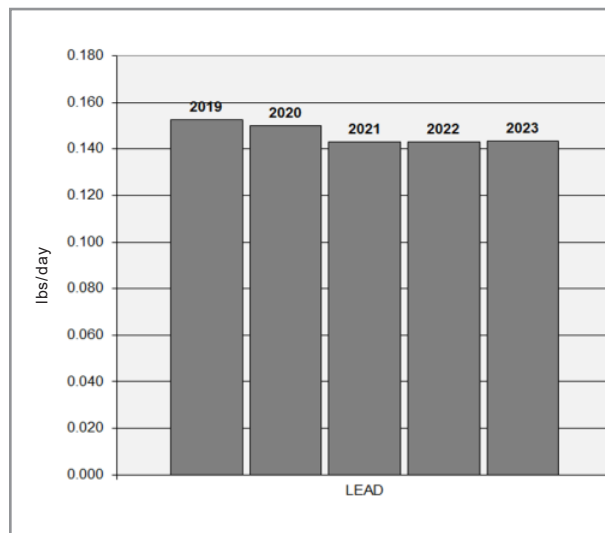
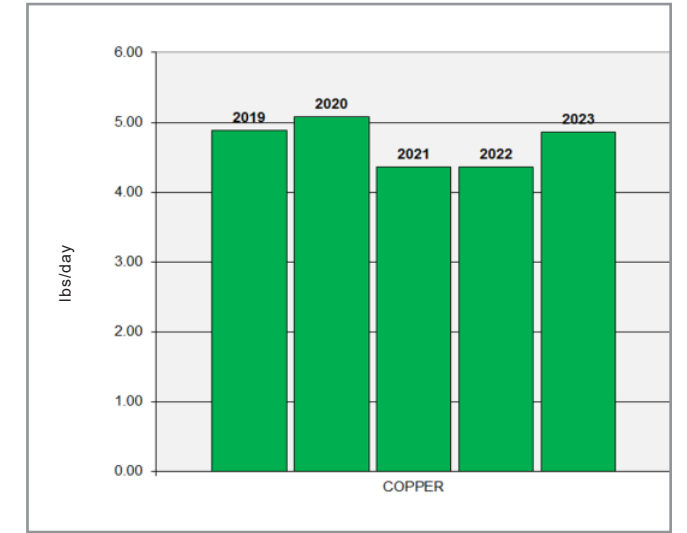
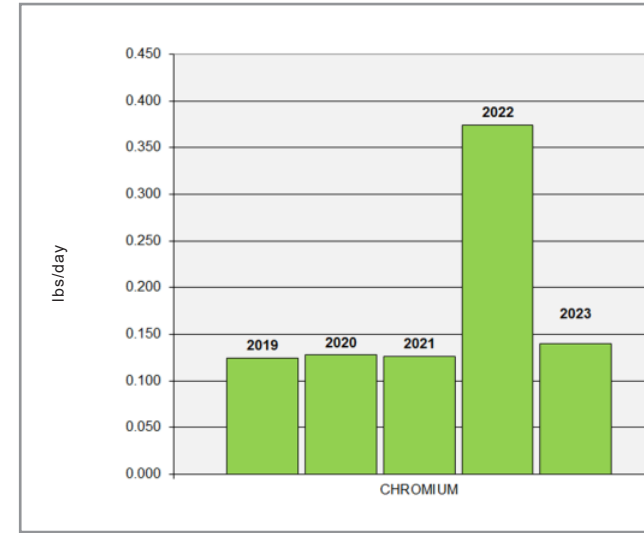
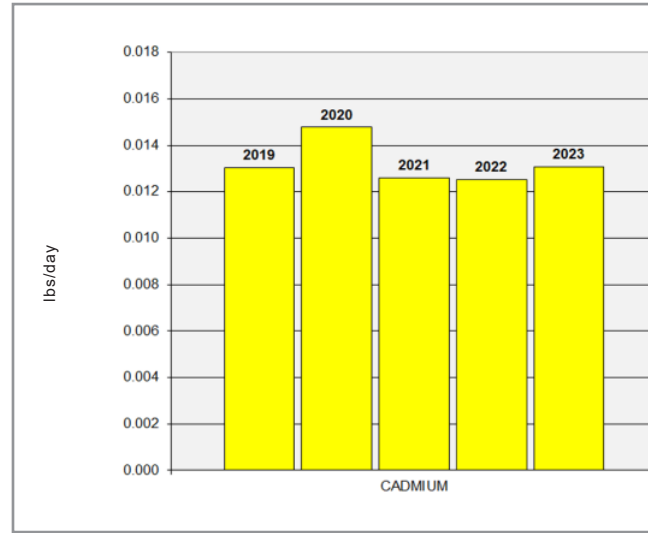
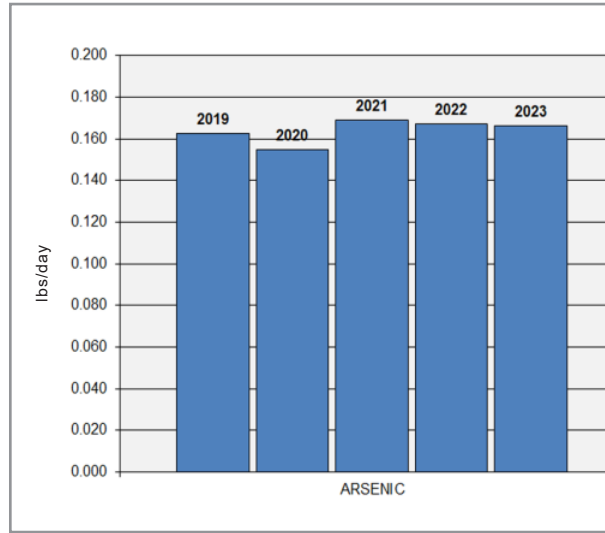
**TABLE THREE**

<b>JOINT AGENCY INSPECTIONS</b>			
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>	<b>Joint Agency</b>
Lacey Family Dental	Lacey	4/4/2023	Thurston County
Olympia Advanced Dentistry	Olympia	4/5/2023	Thurston County
Lee J Edwards DDS	Lacey	4/11/2023	Thurston County
Pacific Dental Center	Lacey	4/12/2023	Thurston County
The Brick On Tropser	Tumwater	4/13/2023	Tumwater
Kevin D Fedak DDS	Lacey	4/18/2023	Thurston County
Revel Lacey/Lacey Senior LLC	Lacey	5/2/2023	Department of Ecology
Peterson & Cammack Family Dentistry	Lacey	5/31/2023	Thurston County
Revel Lacey/Lacey Senior LLC	Lacey	6/1/2023	Department of Ecology
Georgia Pacific	Olympia	6/7/2023	Department of Ecology
Denny's	Tumwater	6/14/2023	Tumwater
Taqueria La Esquina	Olympia	6/28/2023	Olympia
Smash N Burgers	Olympia	6/28/2023	Thurston County
BBQ Junkies	Olympia	6/28/2023	Thurston County
777ish		6/28/2023	Thurston County
Olympia Family Dental	Olympia	7/10/2023	Thurston County
Kamkar Family & Gentle Dentistry	Olympia	7/10/2023	Thurston County
Family Dentistry at Hawks Prairie	Lacey	7/12/2023	Thurston County
Luck Dental Group	Olympia	7/18/2023	Thurston County
Lakes Elementary School	Lacey	7/18/2023	Lacey
Stephen L. Kirkpatrick DDS PLLC	Olympia	7/31/2023	Thurston County
Dental Care of Lacey	Lacey	8/17/2023	Thurston County
Nicole's Bar	Olympia	8/18/2023	Olympia
Reflection Dentistry	Tumwater	8/24/2023	Thurston County
McDonald Dentistry	Olympia	8/29/2023	Thurston County
A Agustin Vega DDS	Olympia	8/29/2023	Thurston County
Sunrise Dental of Olympia	Olympia	8/30/2023	Thurston County
A&R Aviation	Tumwater	8/7/2023	Tumwater
Olympia Endodontic Group	Olympia	9/5/2023	Thurston County
Stillwater Dental	Olympia	9/7/2023	Thurston County
Casa Catrina	Olympia	9/28/2023	Thurston County
Canna Cabana	Lacey	9/29/2023	Thurston County
Sunde Family Dental	Olympia	10/3/2023	Thurston County
The Mark	Olympia	10/3/2023	Olympia
Earthbound Productions	Olympia	10/3/2023	Olympia
Northwest Endodontics Specialist	Olympia	10/5/2023	Thurston County
Janssen Dental	Olympia	10/12/2023	Thurston County
Fisher Jones Family Dentistry	Olympia	10/16/2023	Thurston County

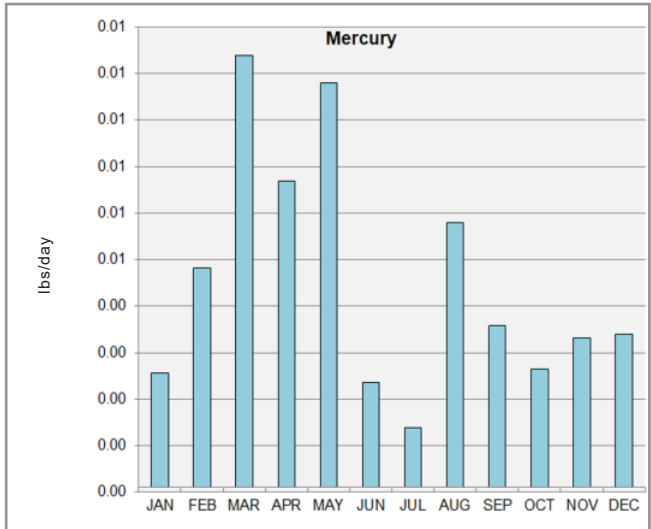
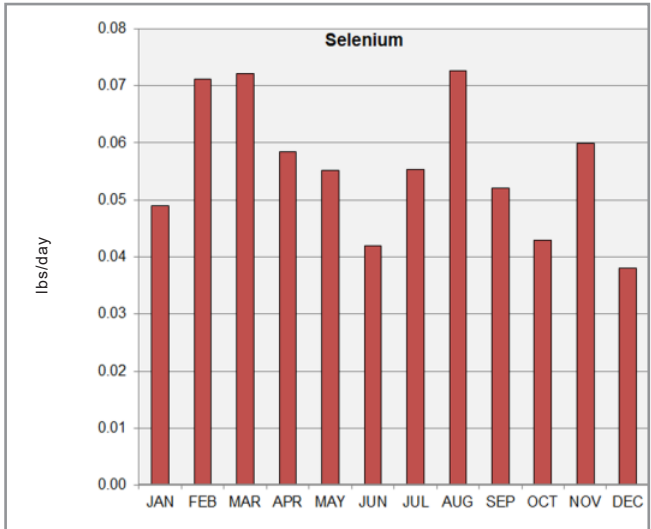
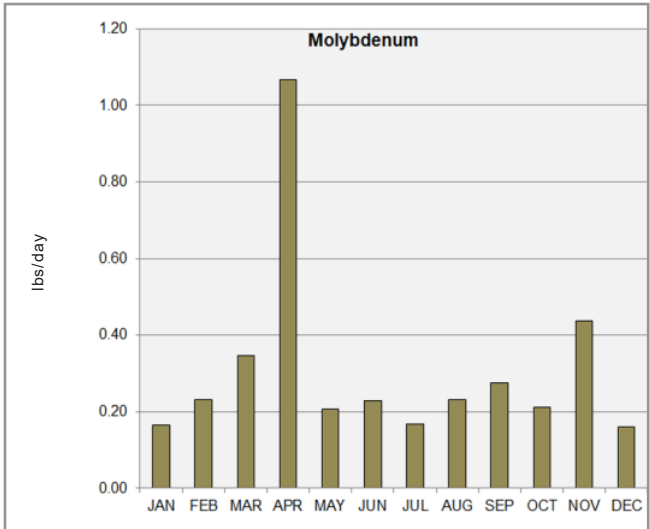
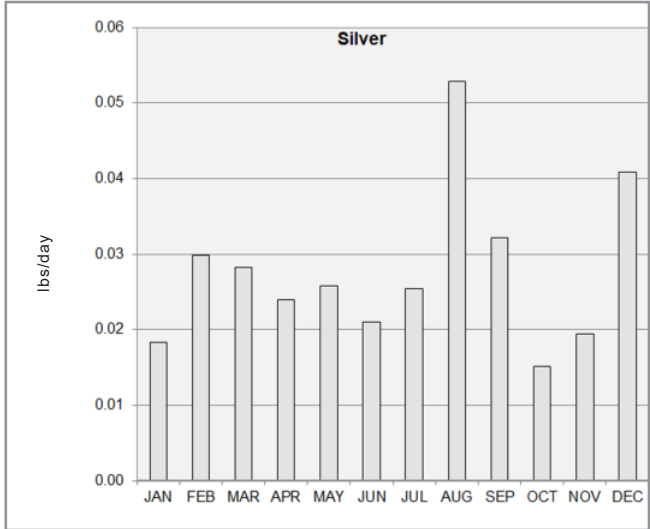
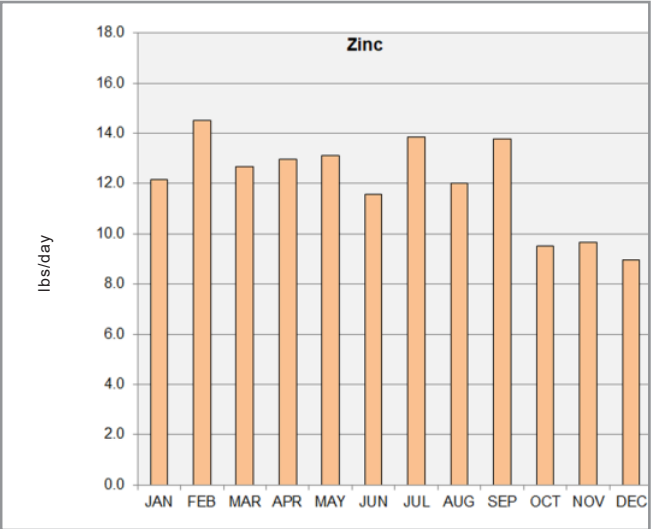
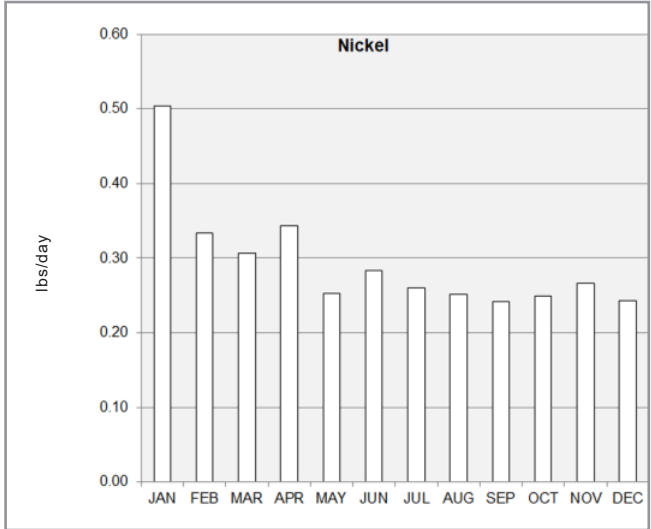
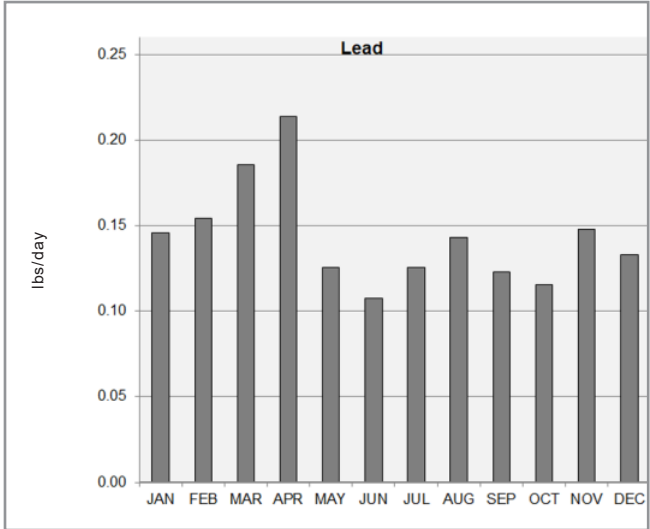
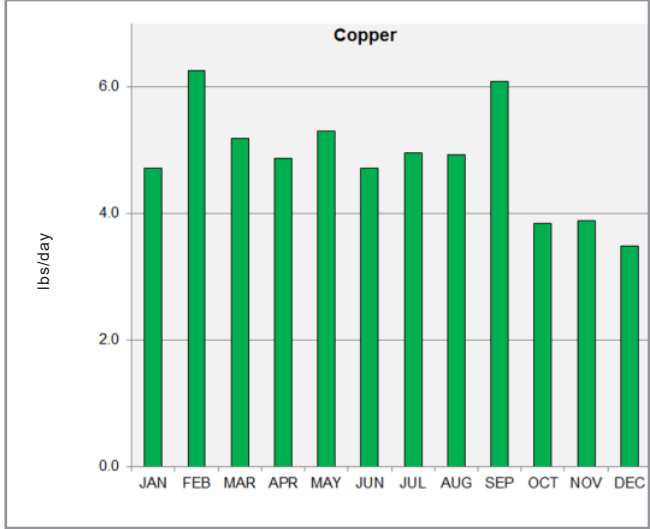
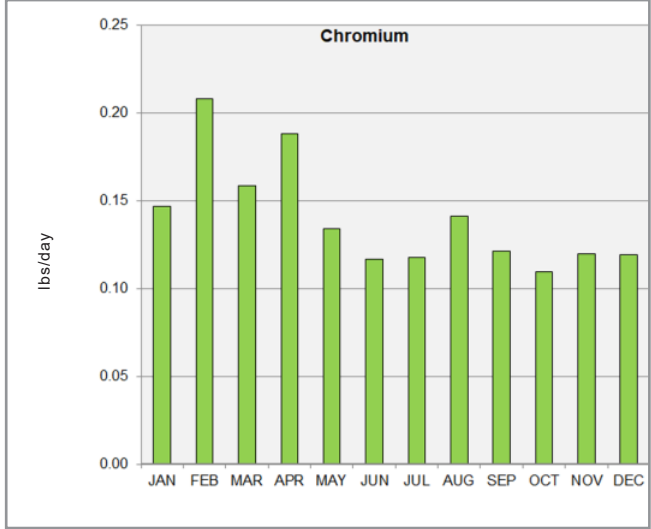
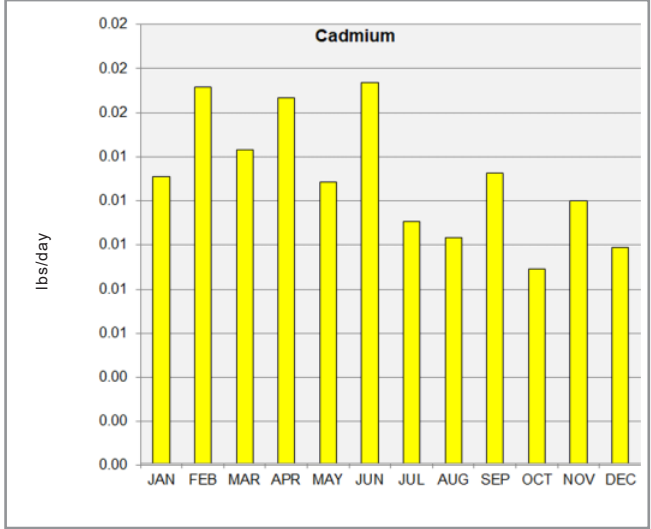
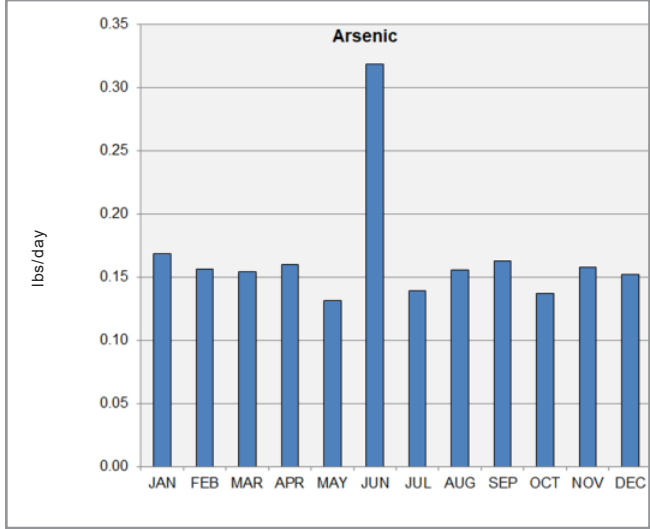
**TABLE THREE CONTINUED**

<b>JOINT AGENCY INSPECTIONS</b>			
<b>Company Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>	<b>Joint Agency</b>
J.R. Setina Manufacturing	Olympia	10/18/2023	Department of Ecology
Northwest Center for Prosthodontics	Olympia	10/23/2023	Thurston County
Light Dental Studios of Olympia	Olympia	10/24/2023	Thurston County
Cooper Point Dental	Olympia	10/24/2023	Thurston County
Sea Mar Dental Clinic	Olympia	11/2/2023	Thurston County
Tumwater Family Dentistry	Tumwater	11/16/2023	Thurston County
Trosper Dental Care	Tumwater	11/16/2023	Thurston County
Vics Pizza East Side	Olympia	11/17/2023	Thurston County
Jimmy John's	Lacey	11/17/2023	Thurston County
Pho & Baguette	Tumwater	11/20/2023	Thurston County
Streets of Singapore	Olympia	11/21/2023	Thurston County
Affordable Family Dental	Tumwater	11/22/2023	Thurston County
NW Smiles	Lacey	11/29/2023	Thurston County
Safe Harbor Dental	Tumwater	11/30/2023	Thurston County
Winsor Fireform	Tumwater	12/14/2023	Department of Ecology
Equal Latin	Olympia	12/18/2023	Thurston County

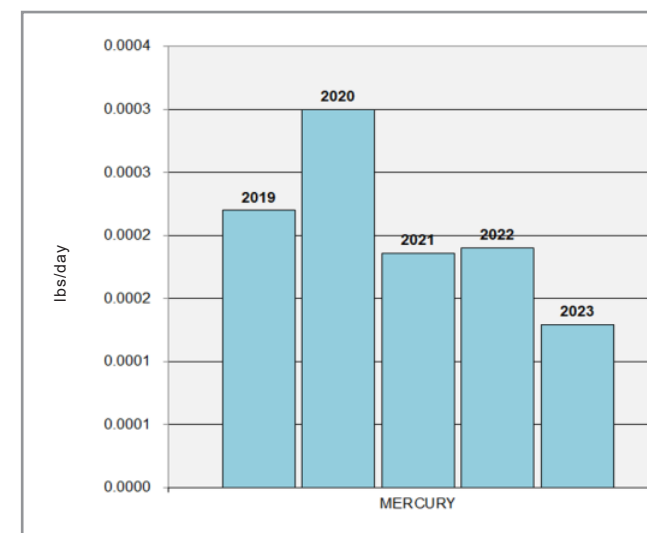
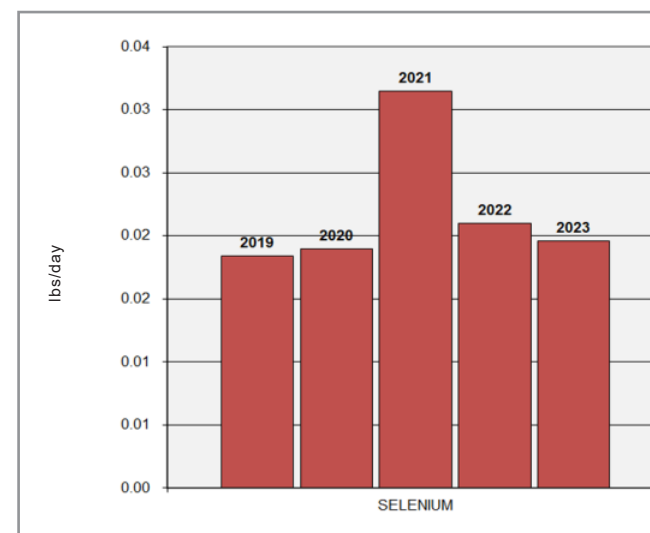
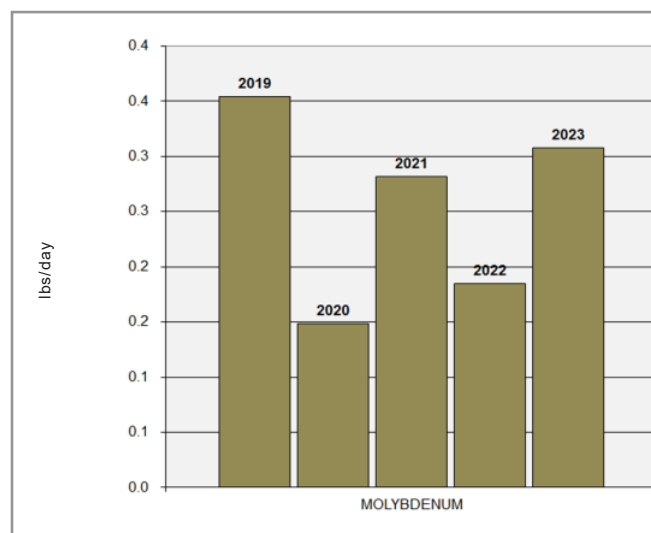
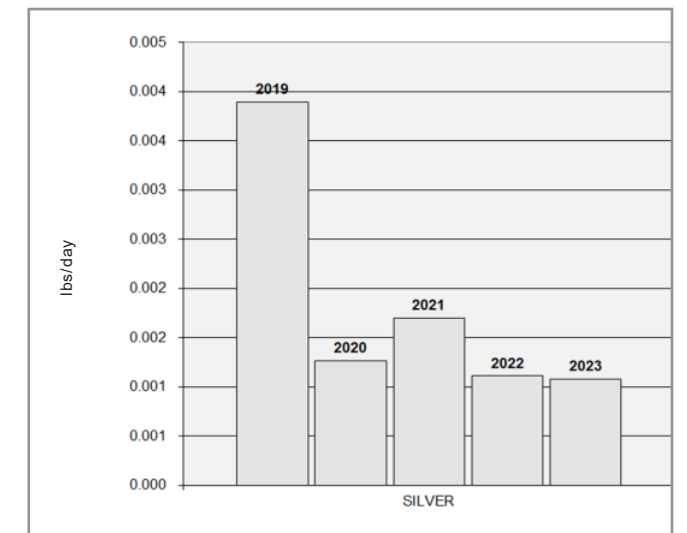
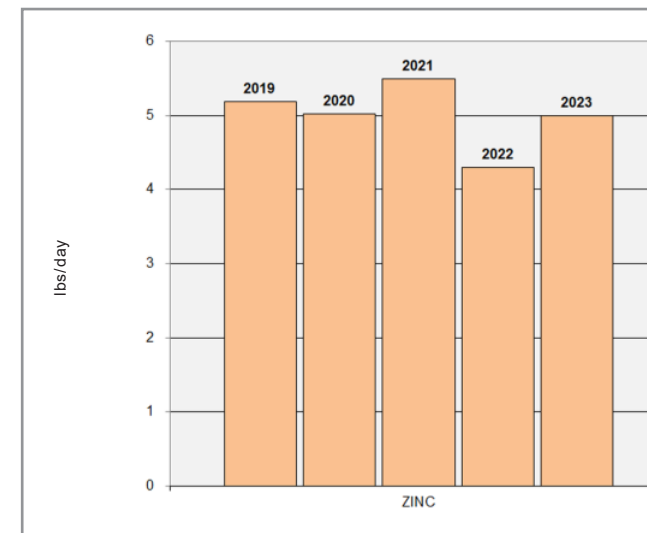
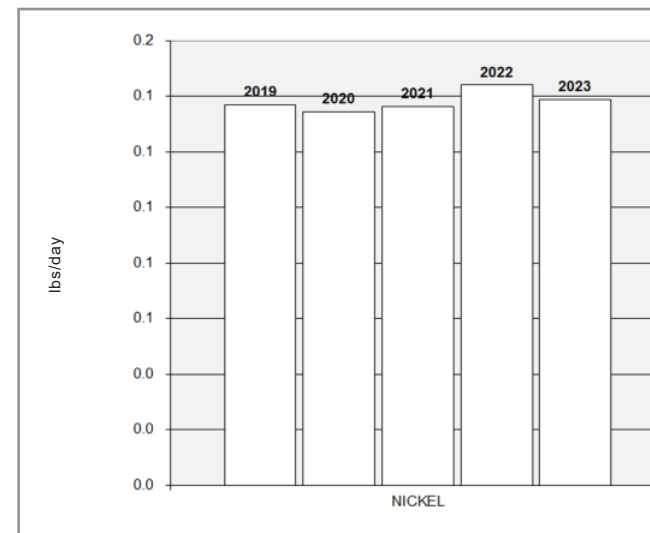
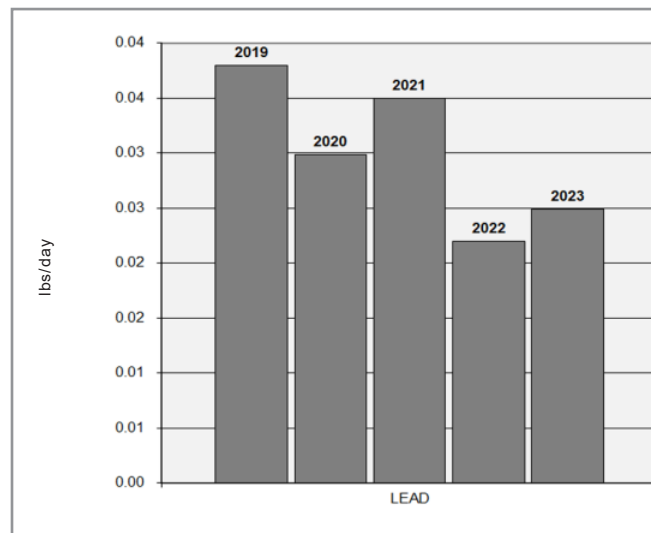
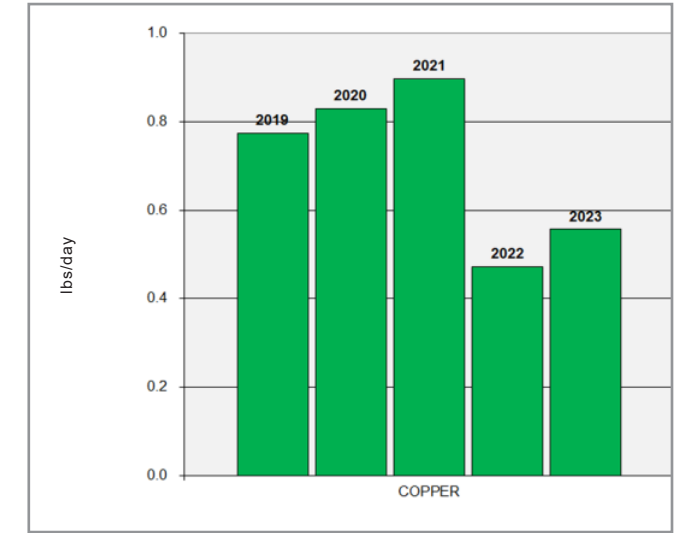
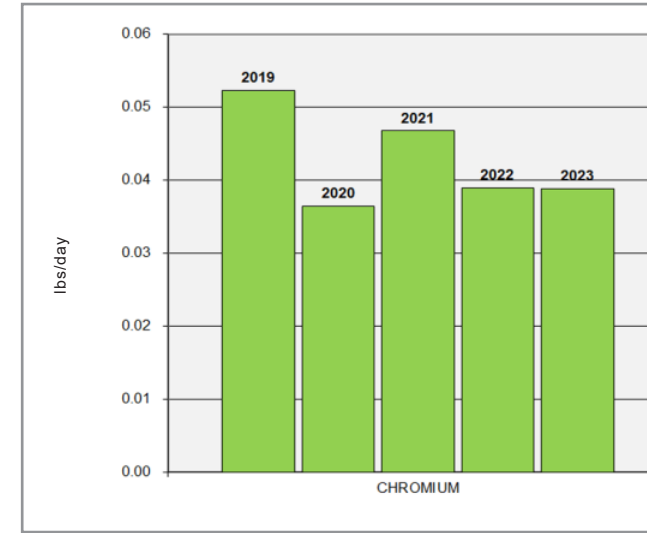
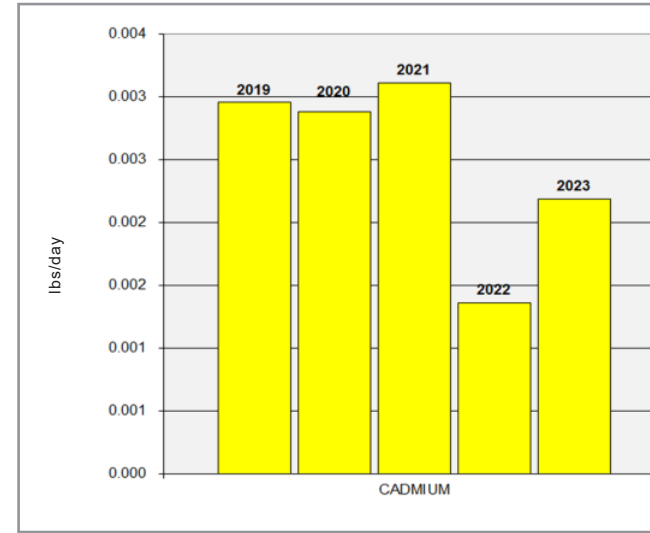
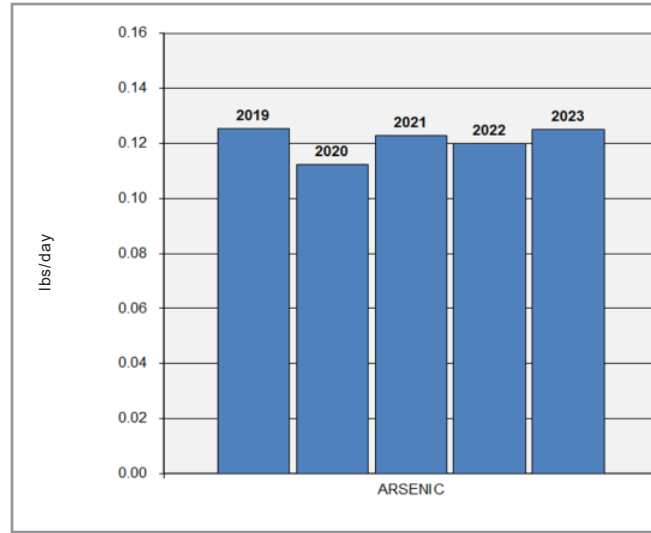
# BUDD INLET TREATMENT PLANT INFLUENT METALS LOADING TRENDS 2019-2023



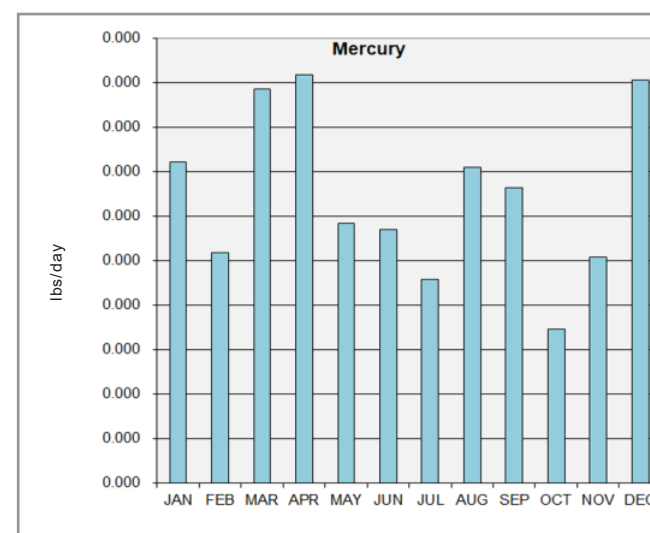
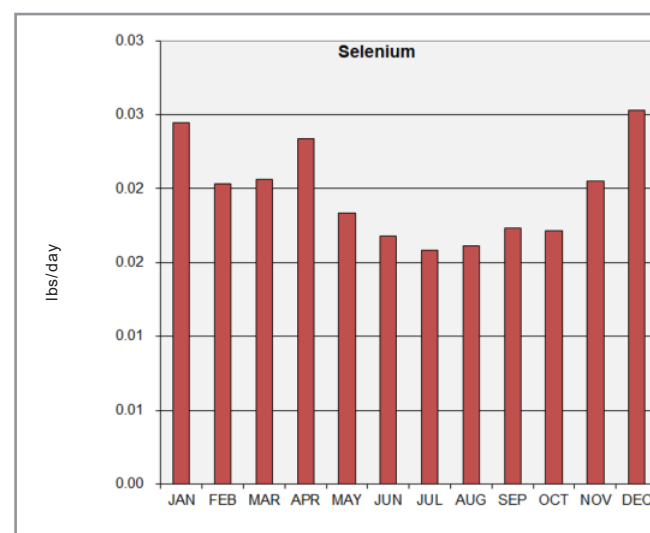
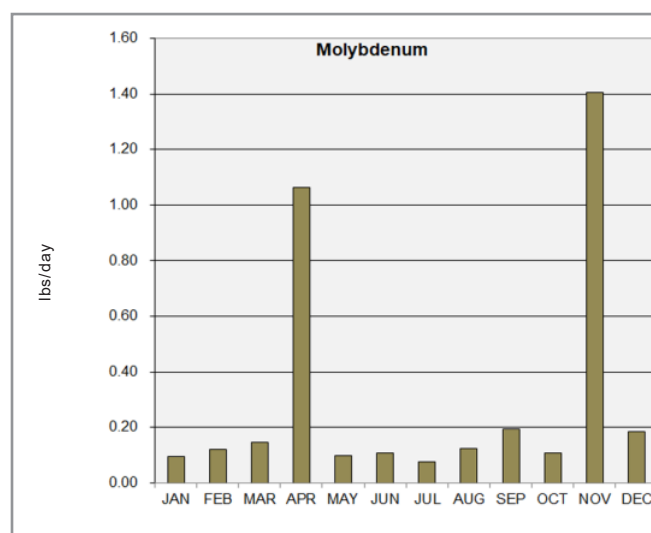
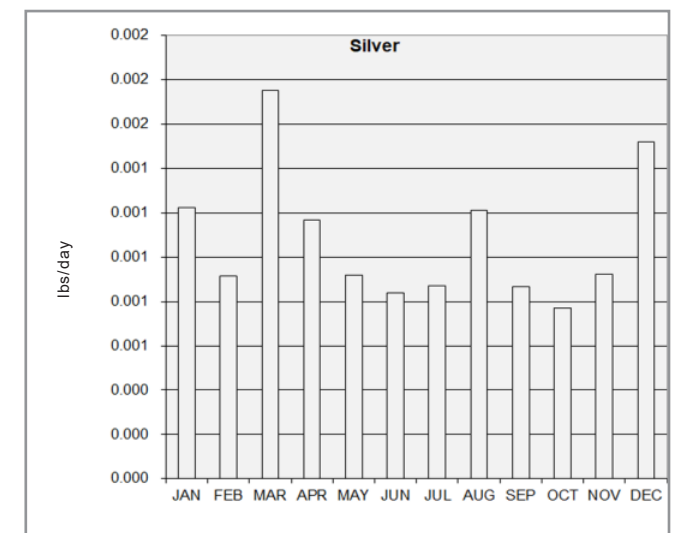
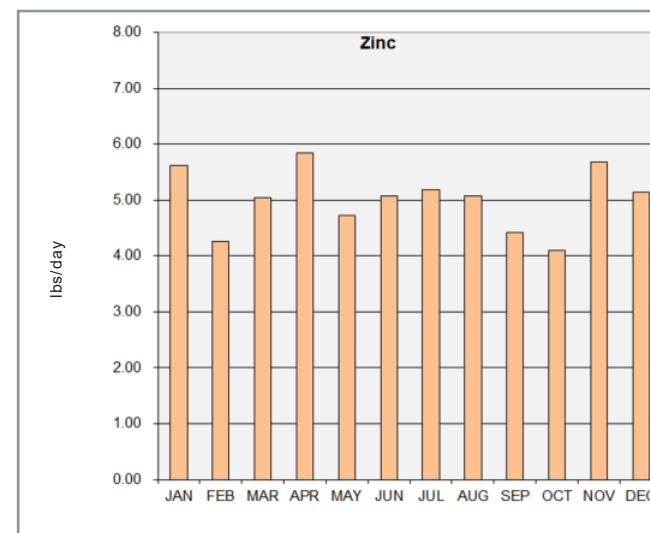
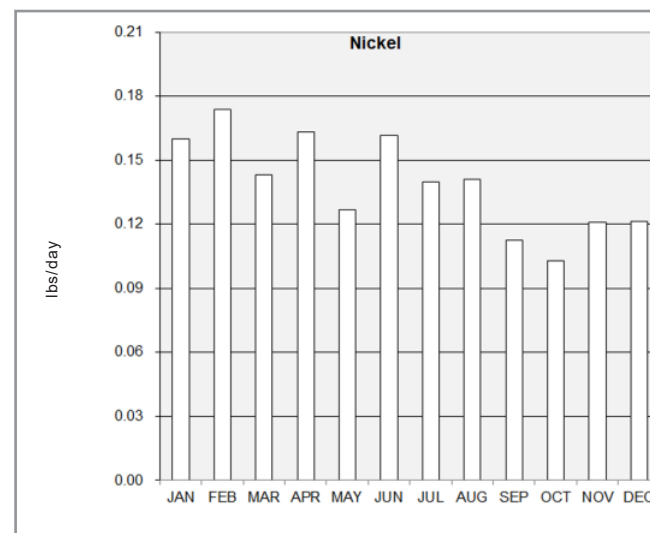
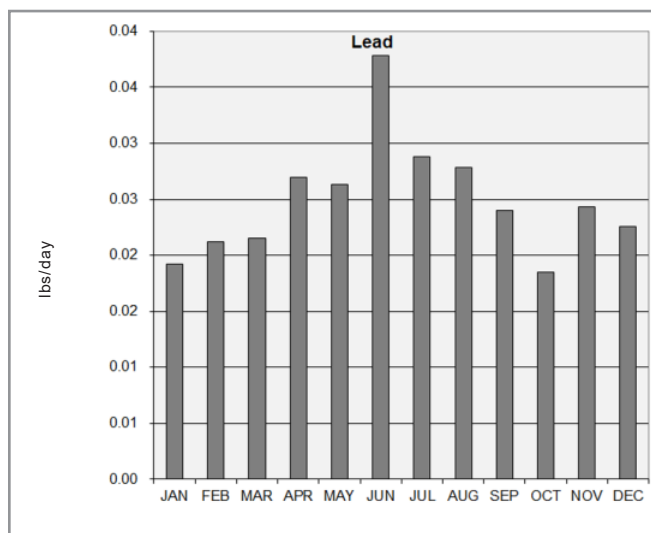
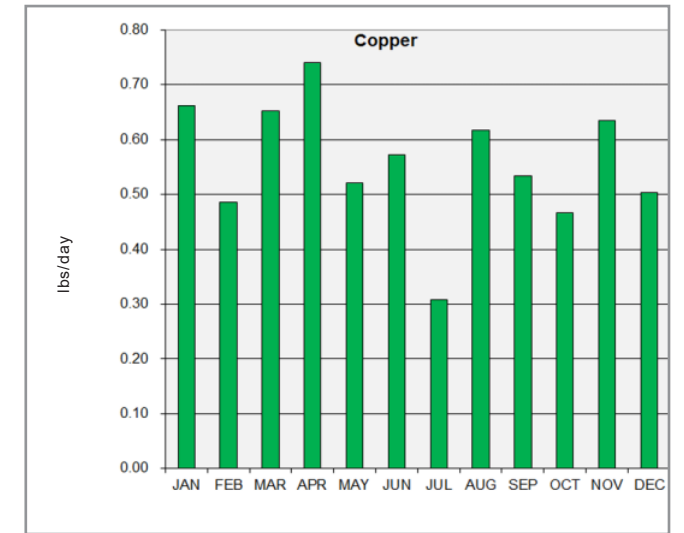
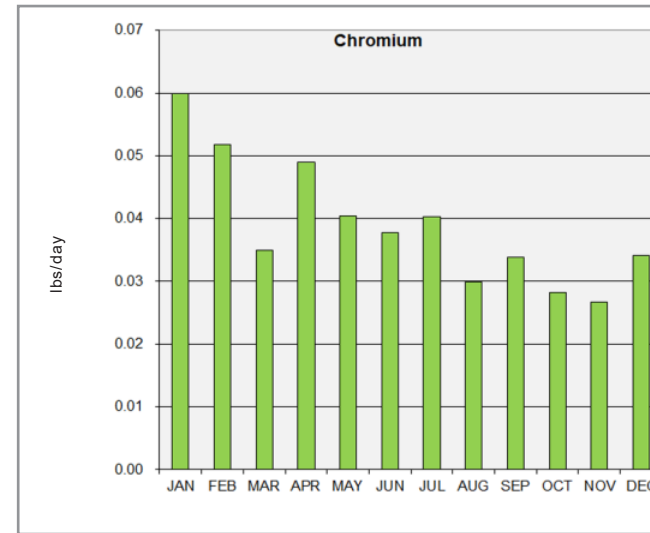
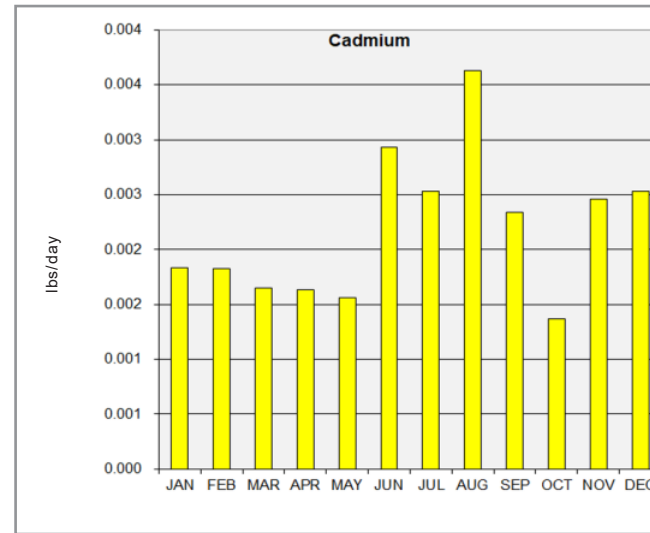
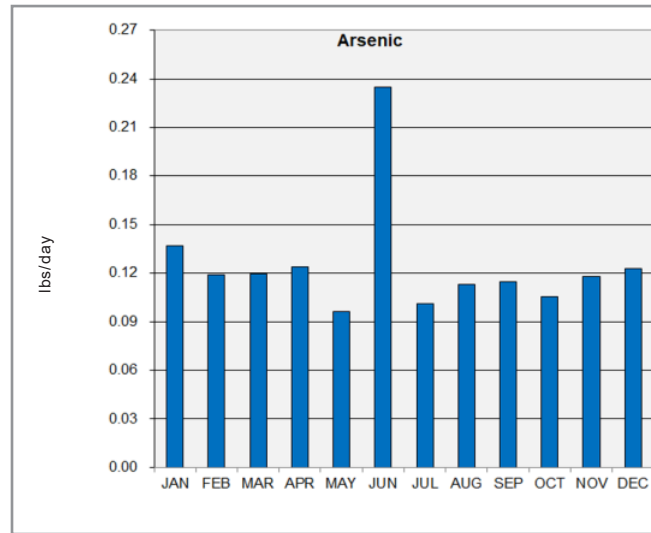
# BUDD INLET TREATMENT PLANT INFLUENT METALS LOADINGS JANUARY-DECEMBER 2023



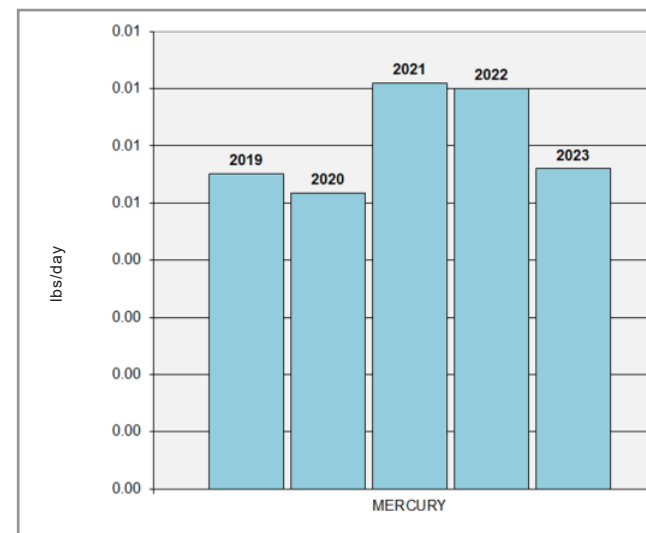
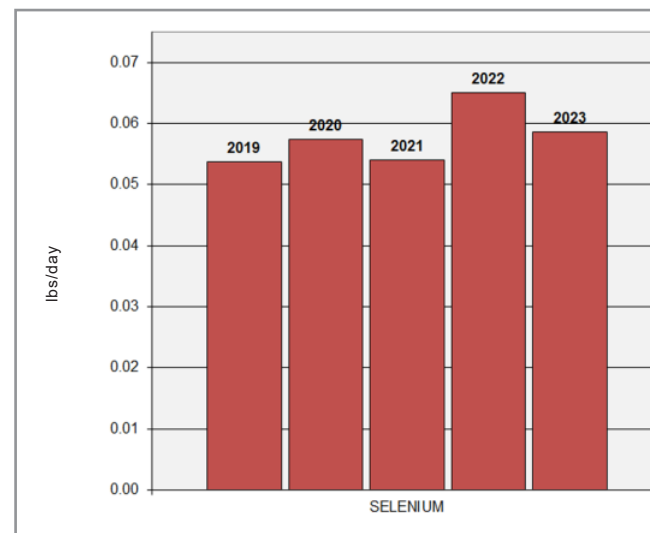
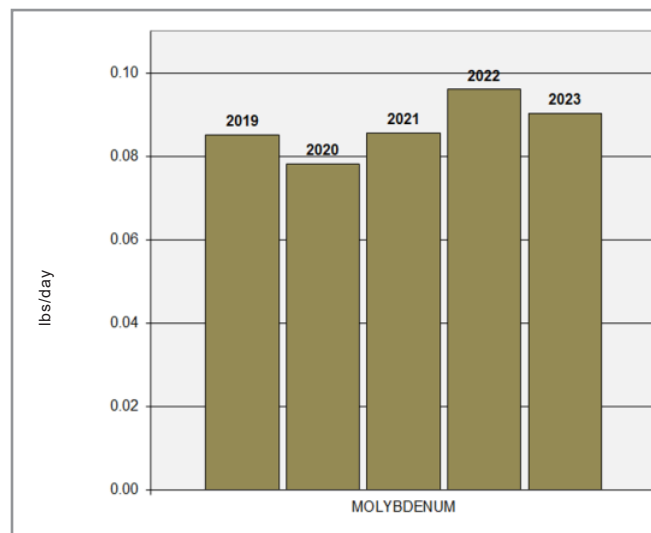
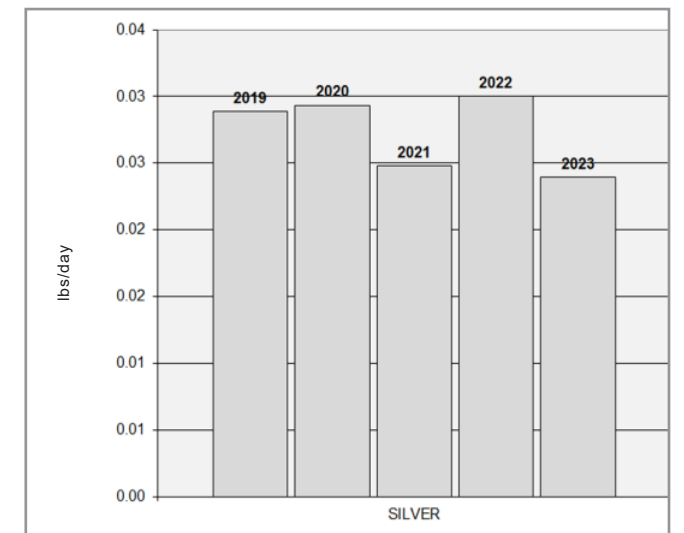
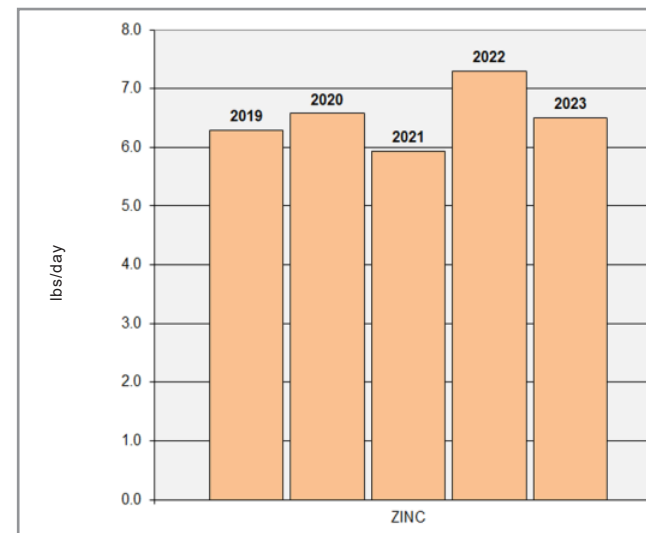
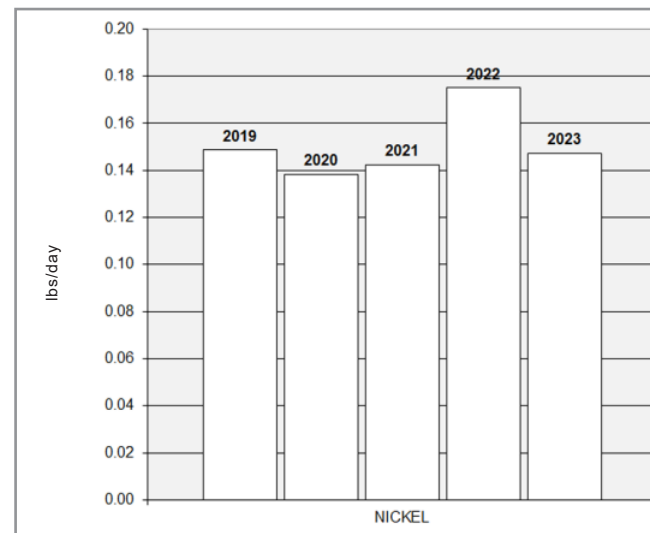
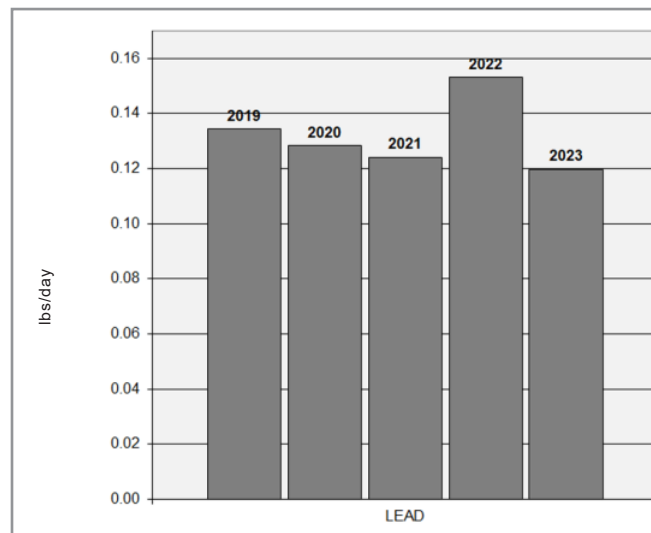
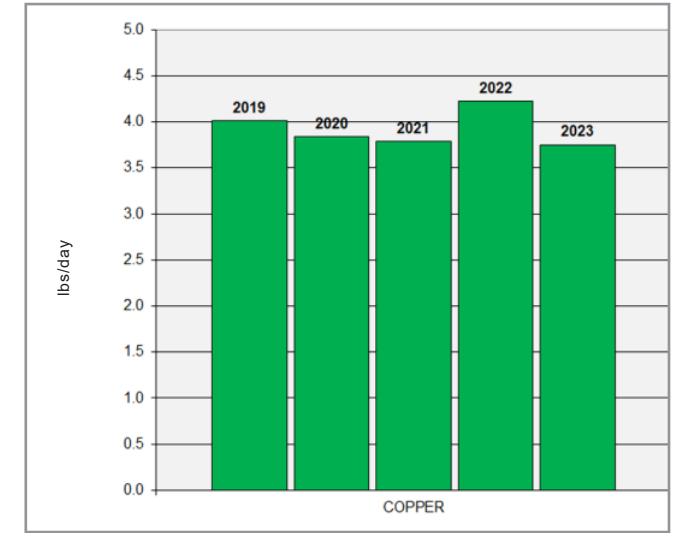
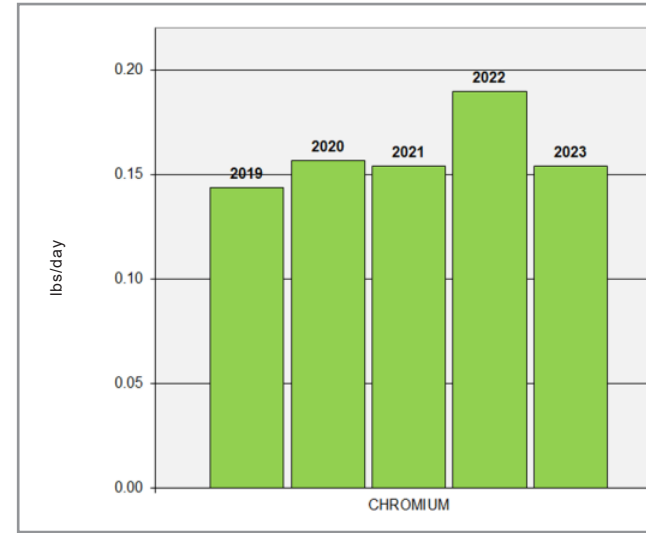
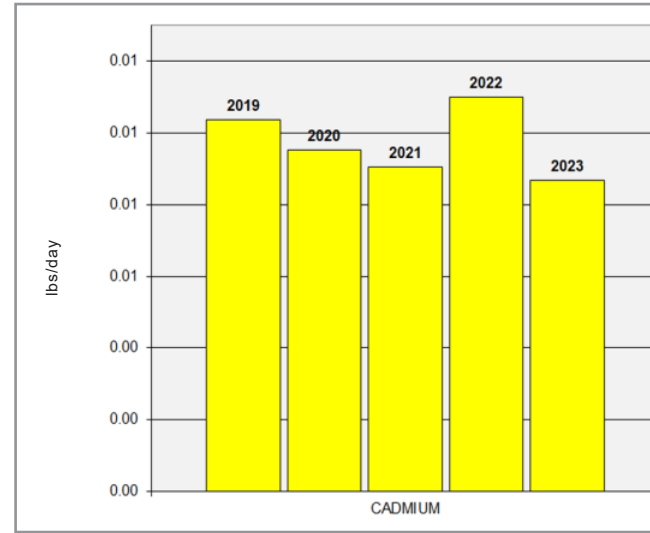
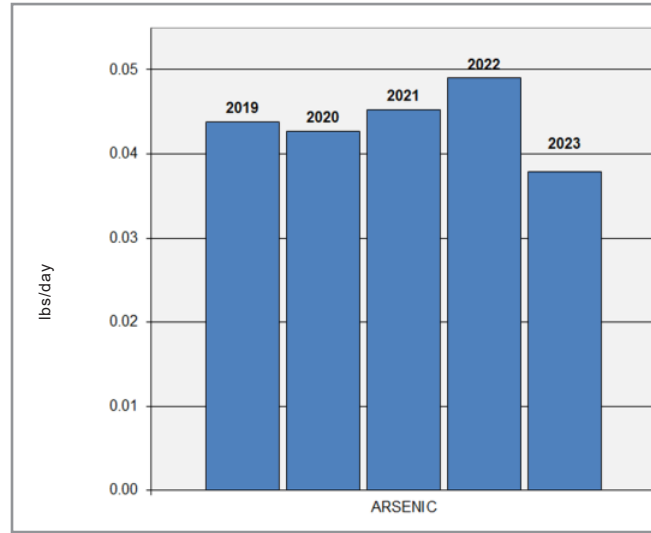
# BUDD INLET TREATMENT PLANT FINAL EFFLUENT METALS LOADING TRENDS 2019-2023



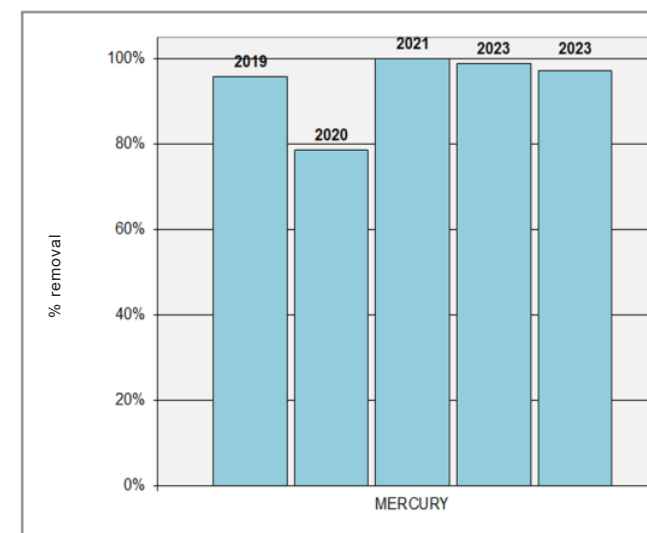
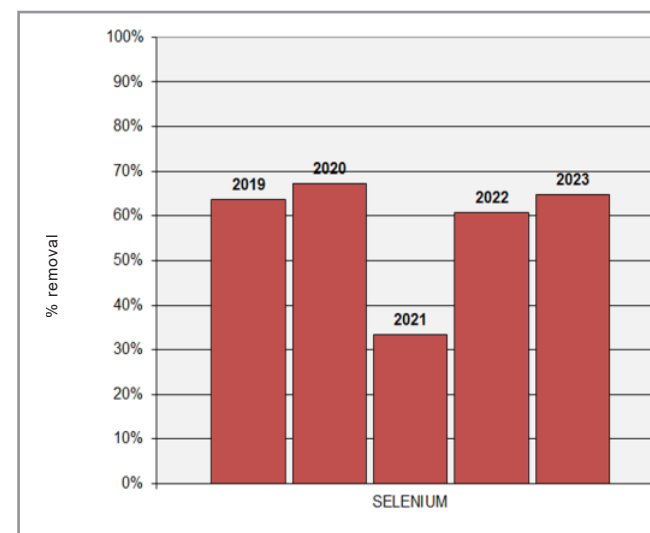
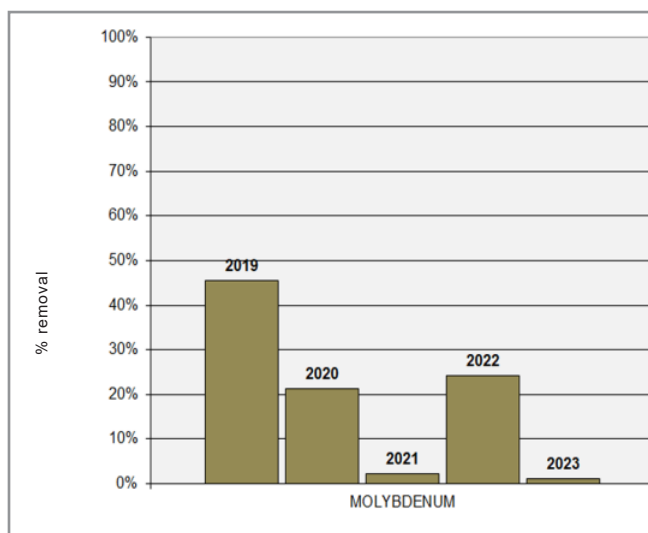
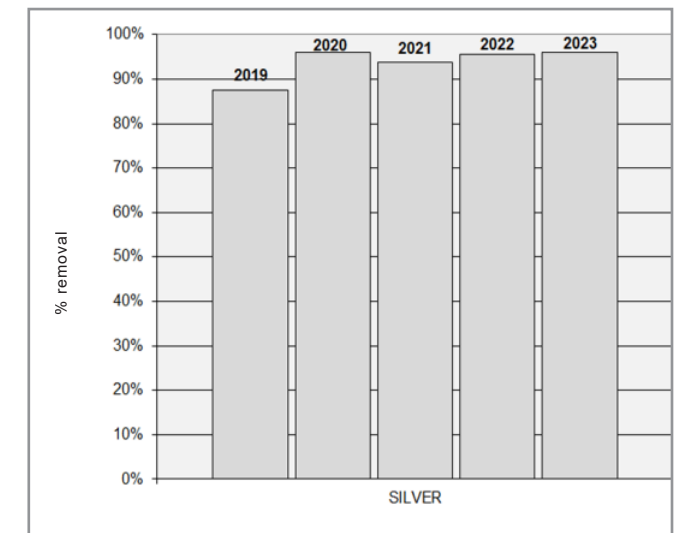
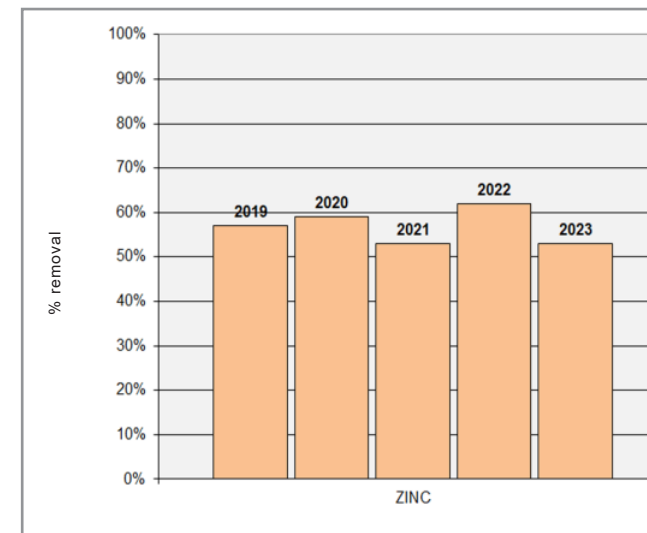
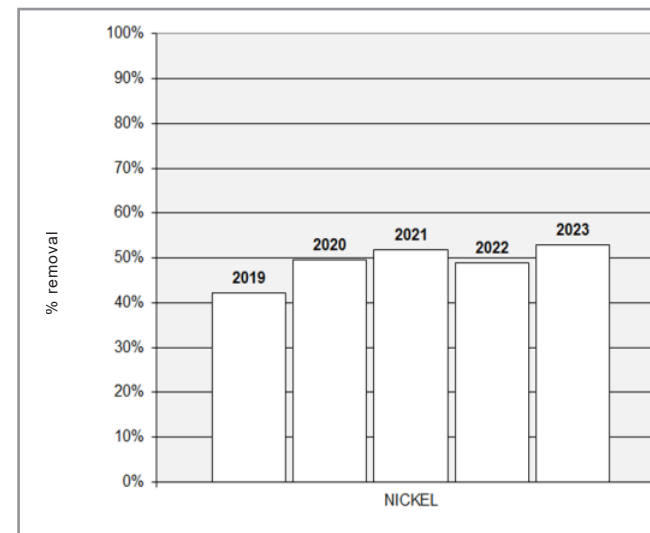
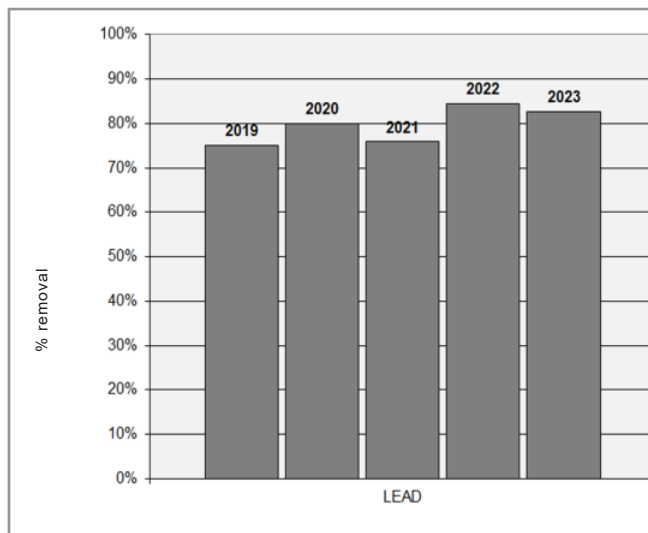
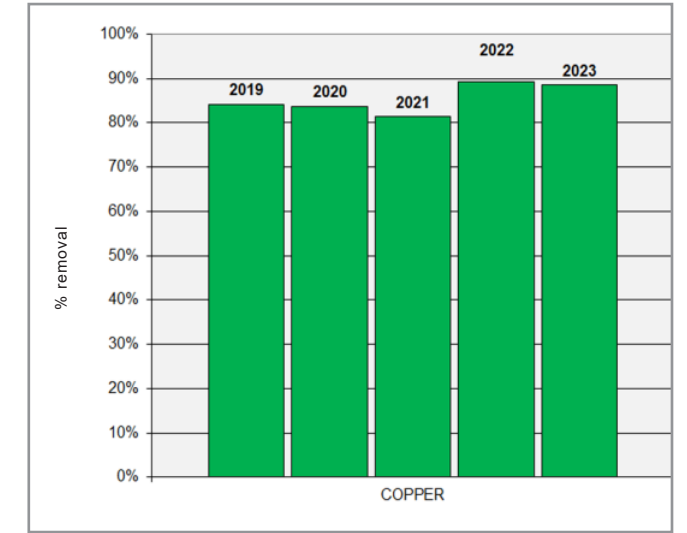
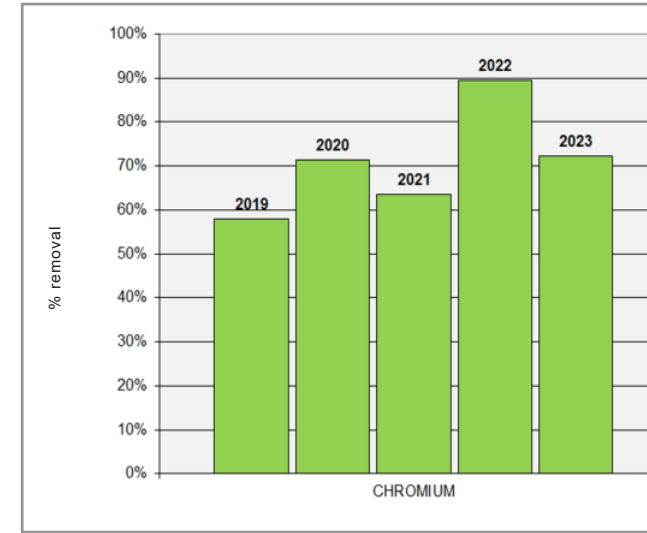
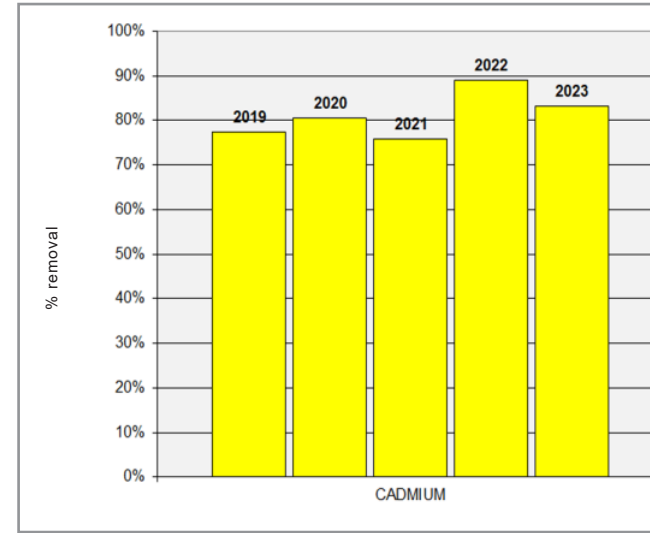
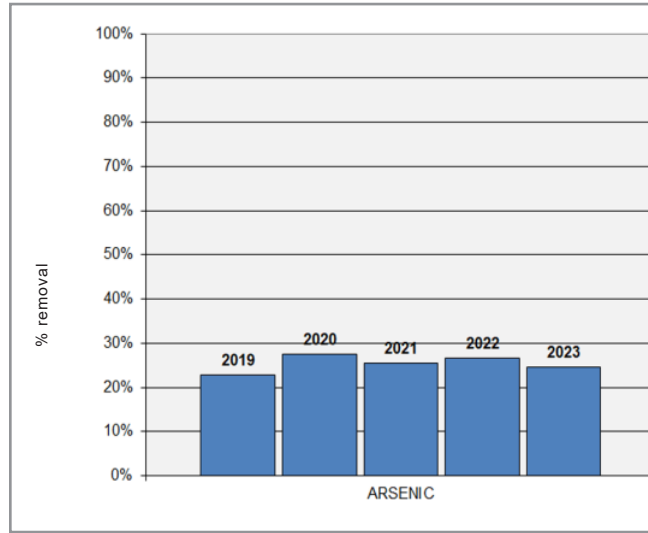
# BUDD INLET TREATMENT PLANT FINAL EFFLUENT METALS LOADINGS JANUARY-DECEMBER 2023



# BUDD INLET TREATMENT PLANT BIOSOLIDS METALS LOADING TRENDS 2019-2023

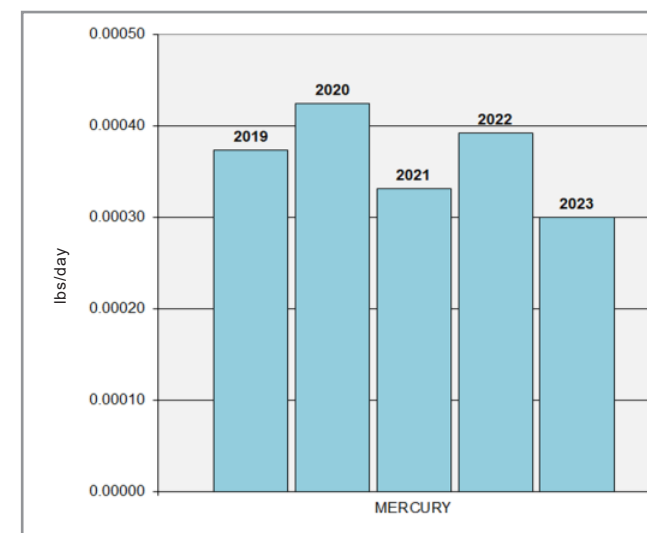
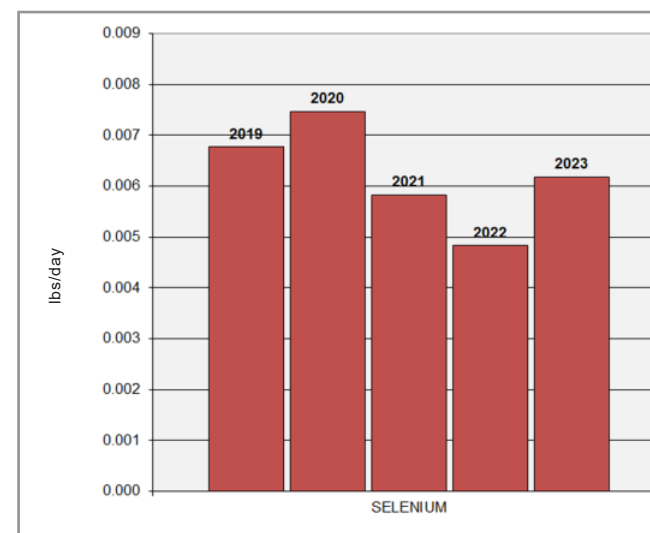
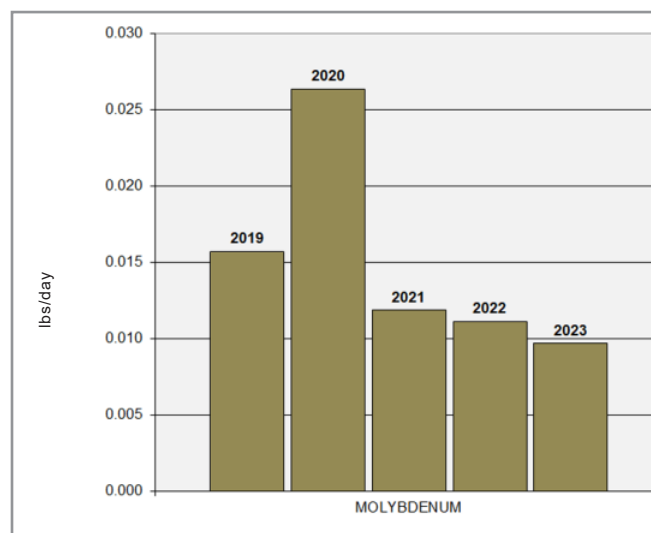
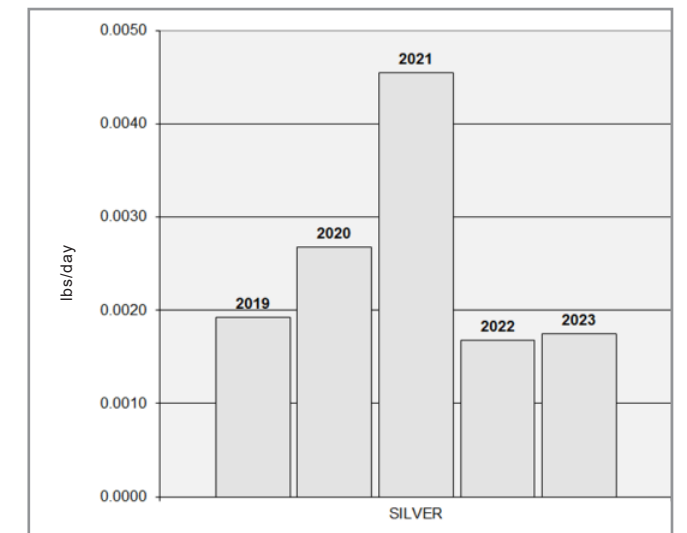
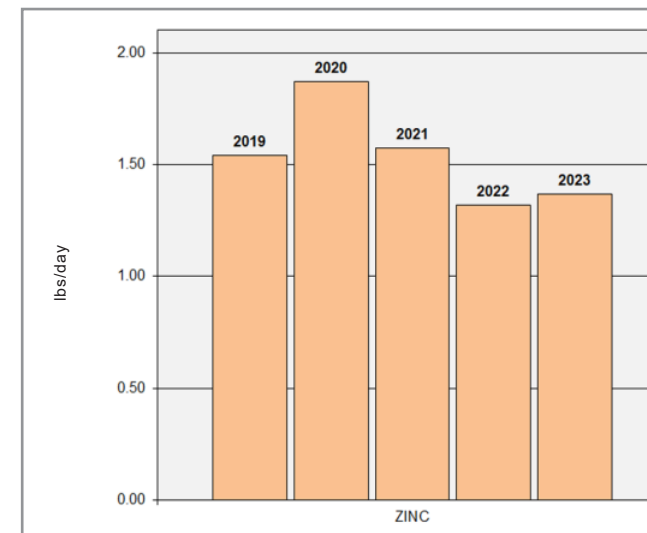
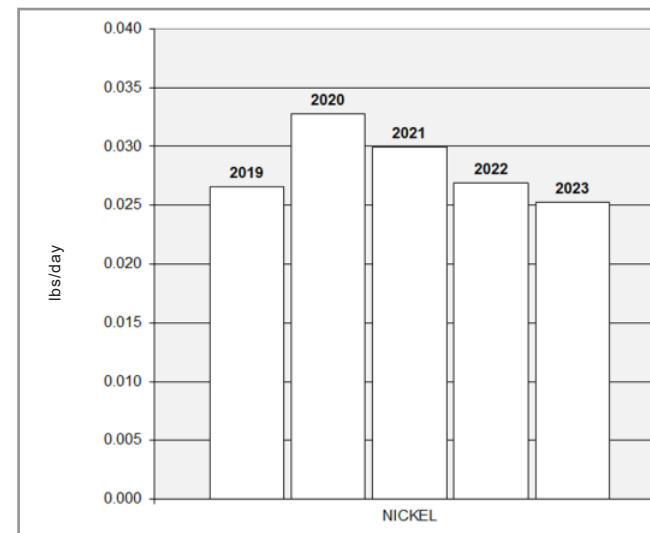
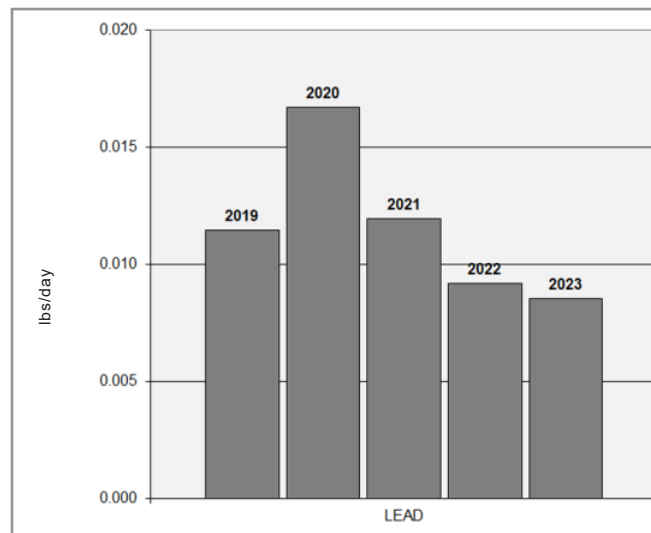
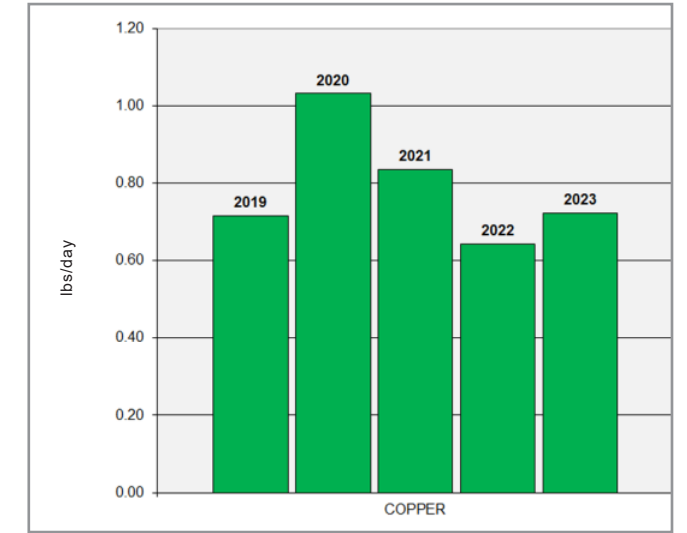
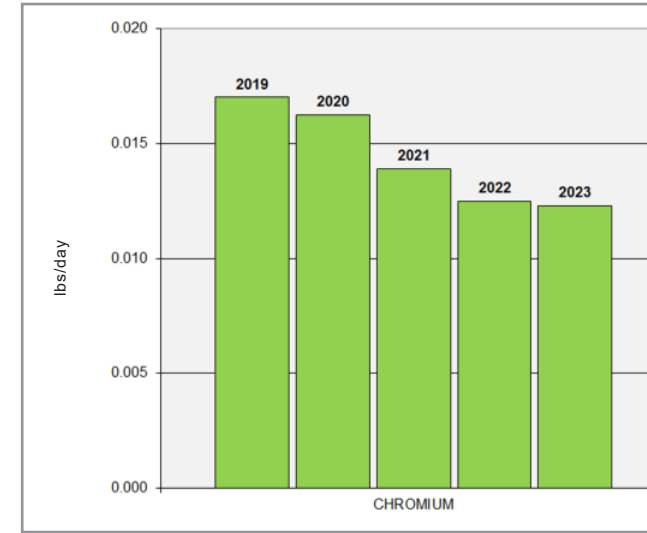
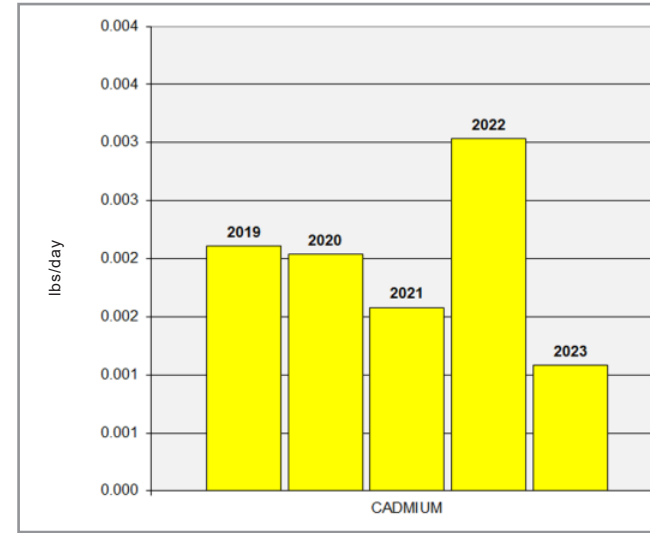
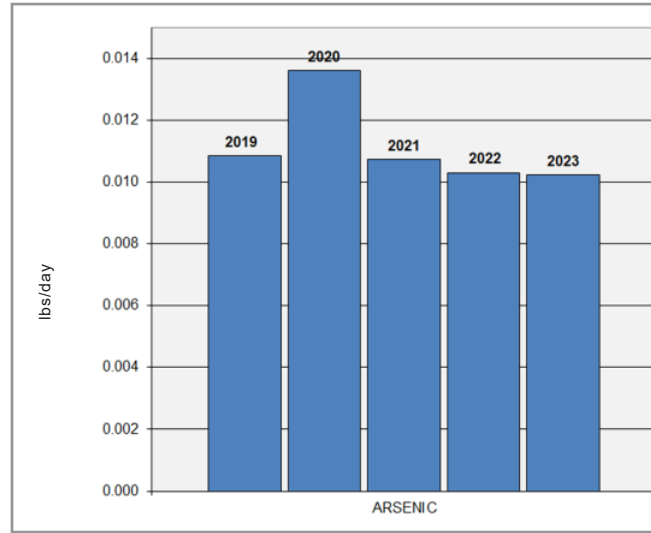


# BUDD INLET TREATMENT PLANT REMOVAL EFFICIENCY TRENDS 2019-2023

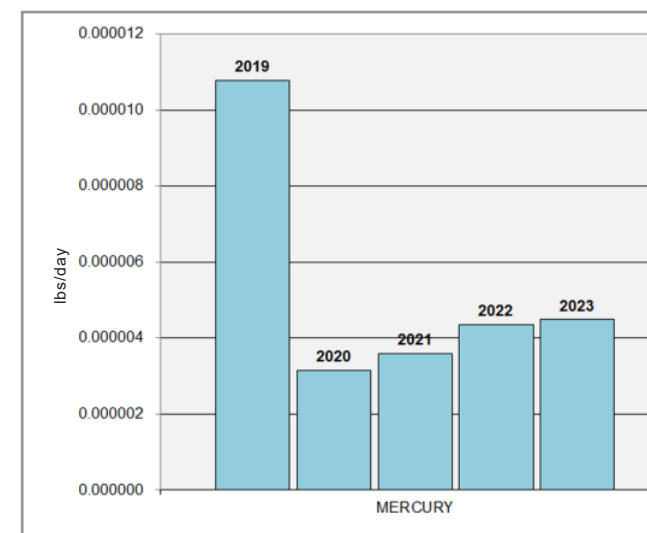
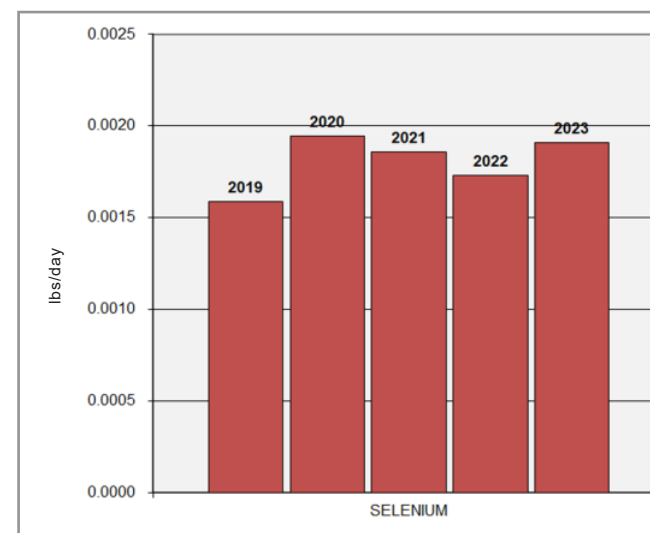
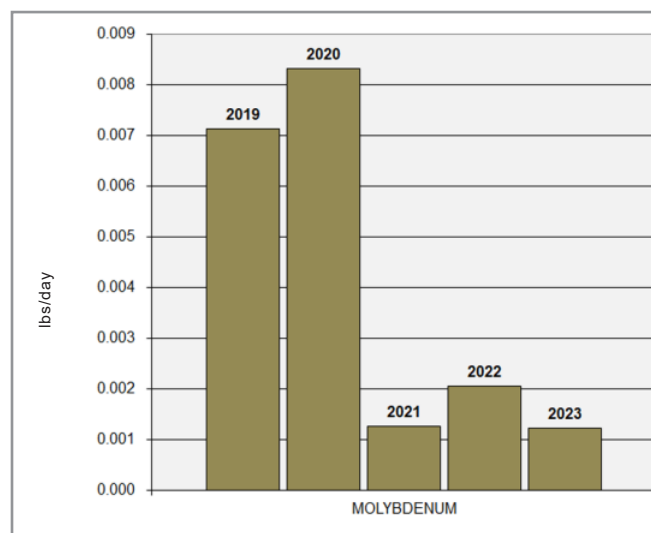
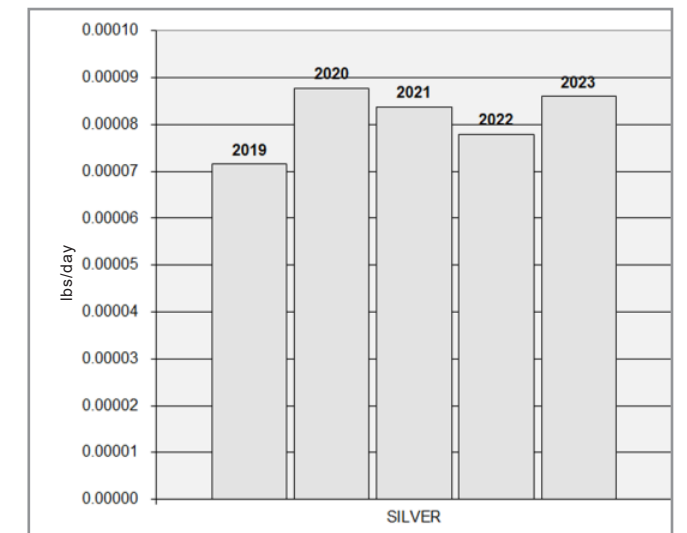
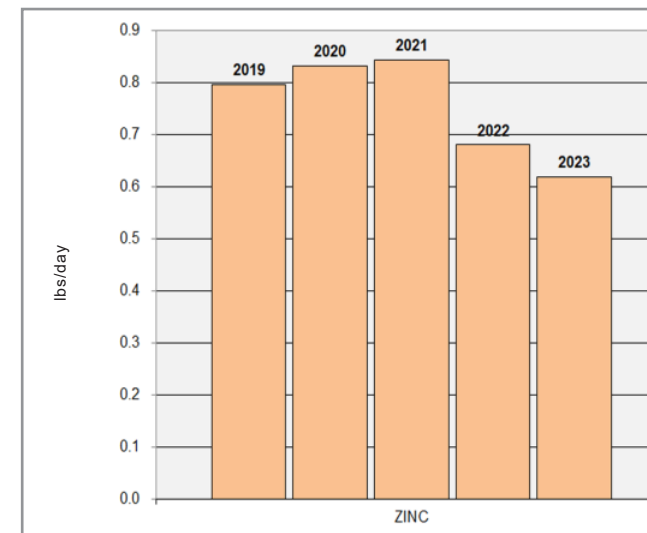
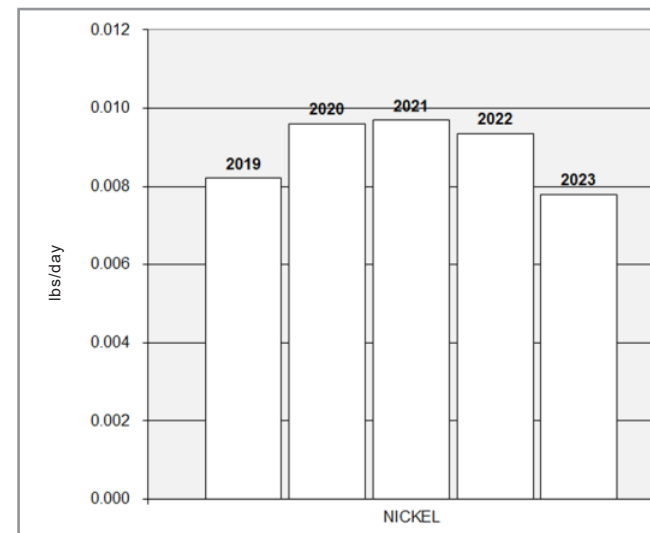
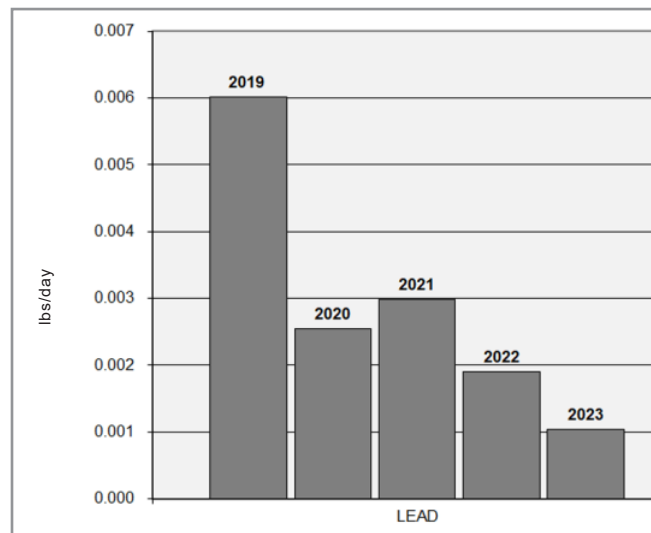
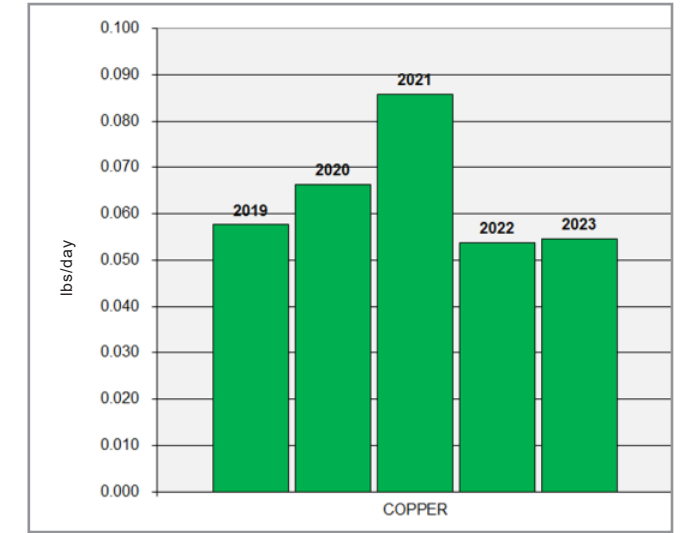
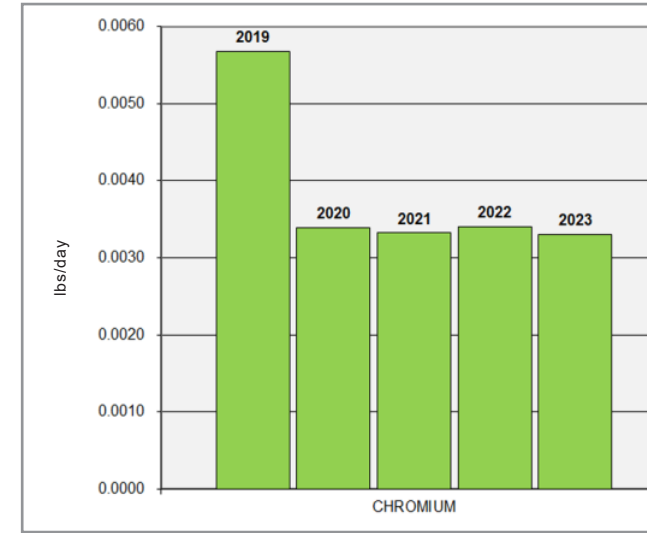
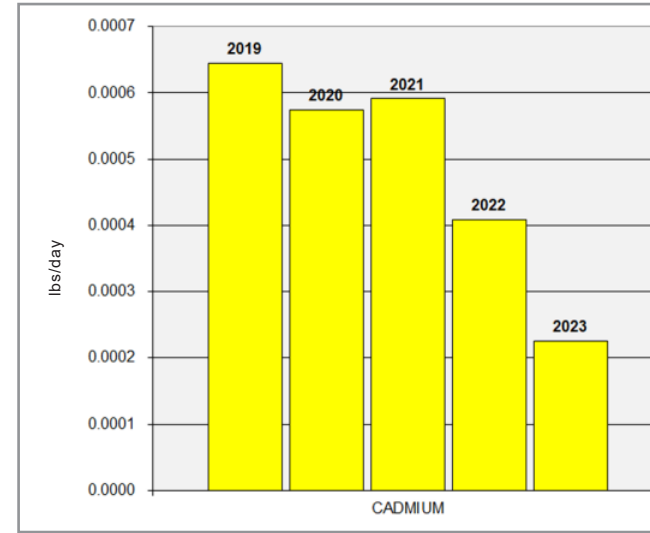
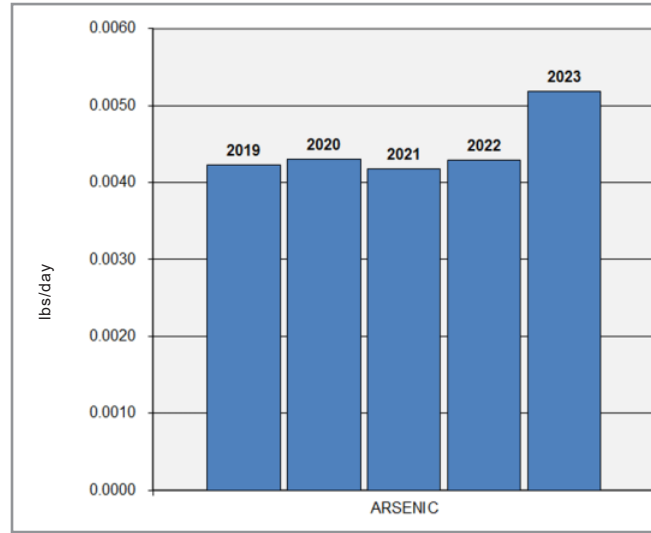




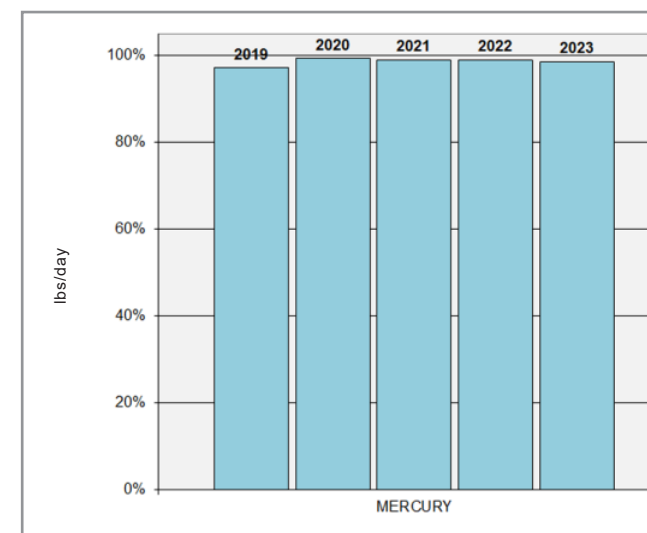
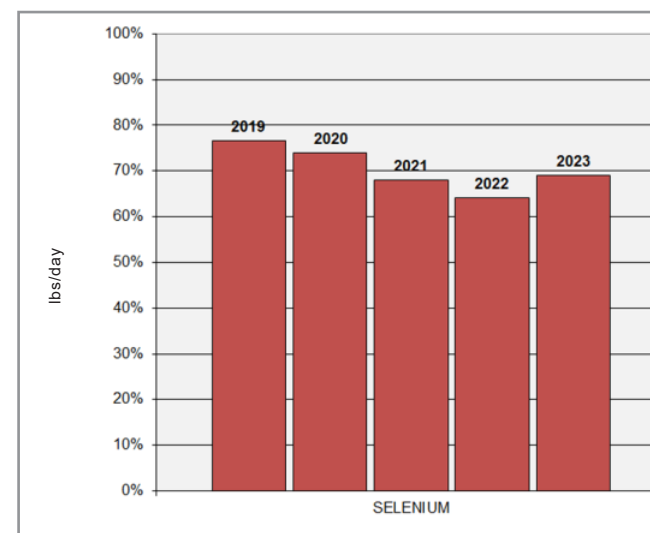
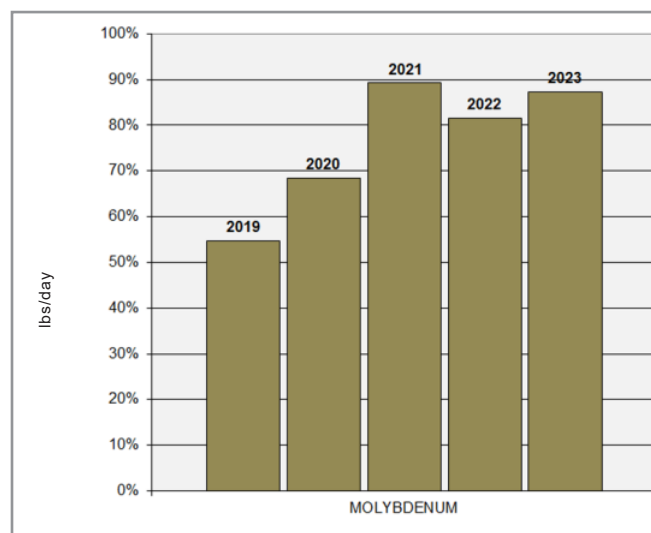
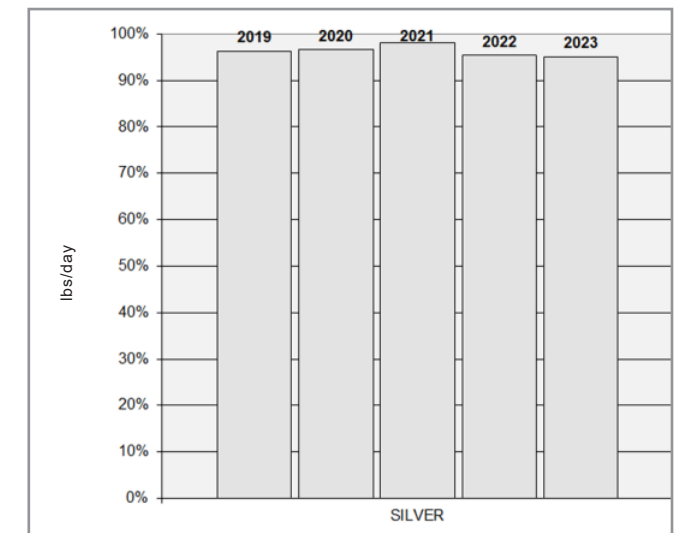
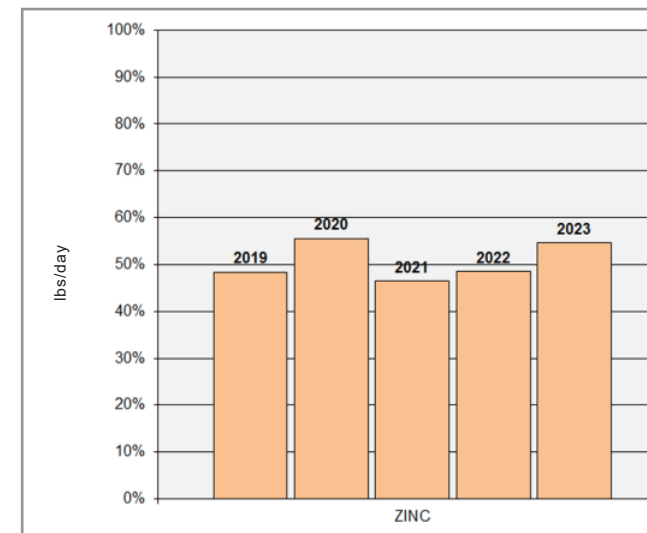
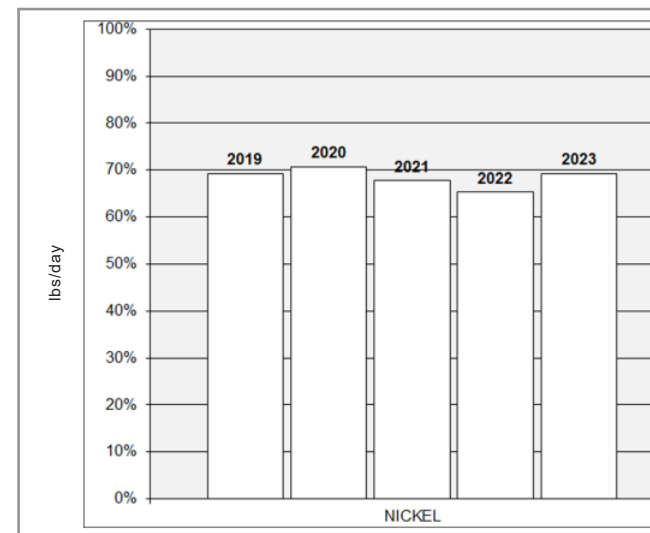
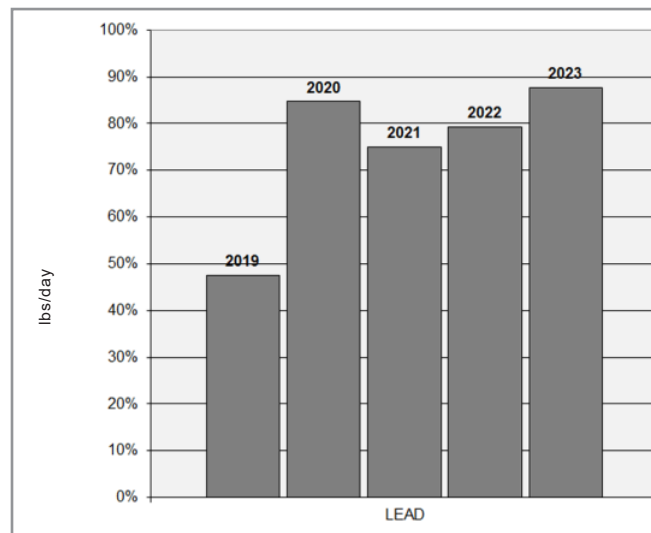
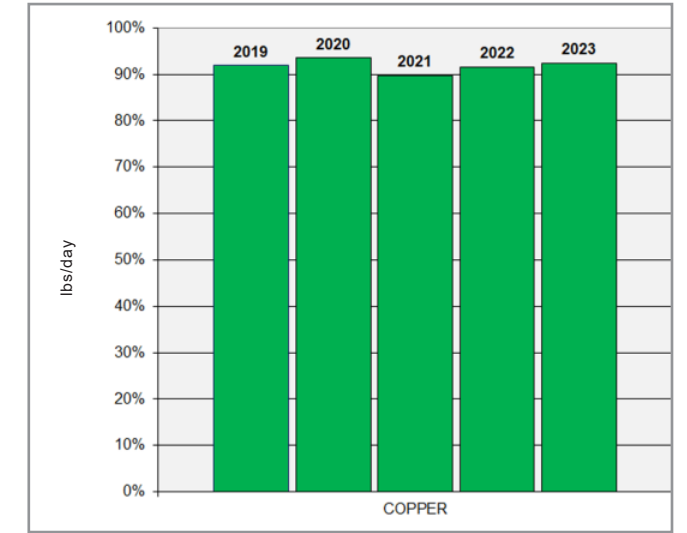
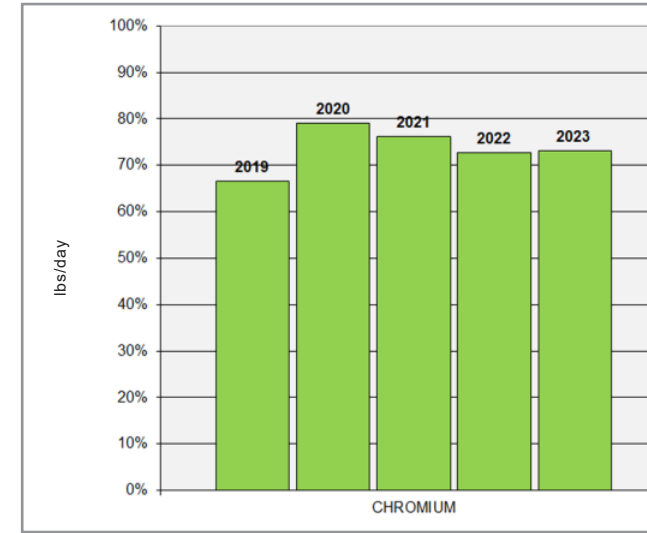
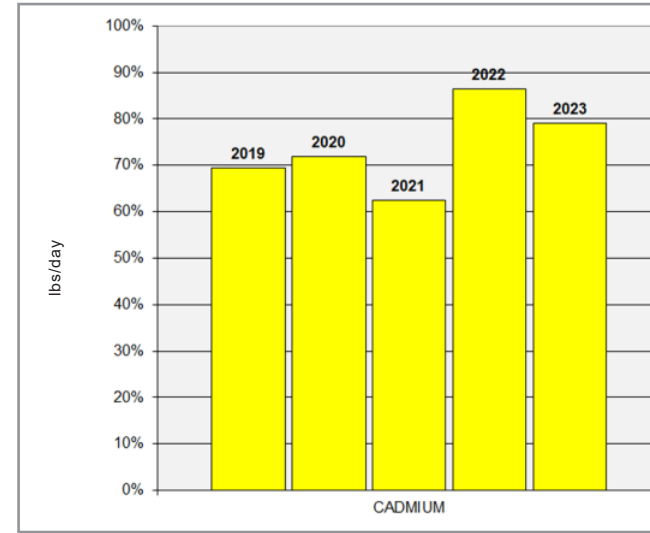
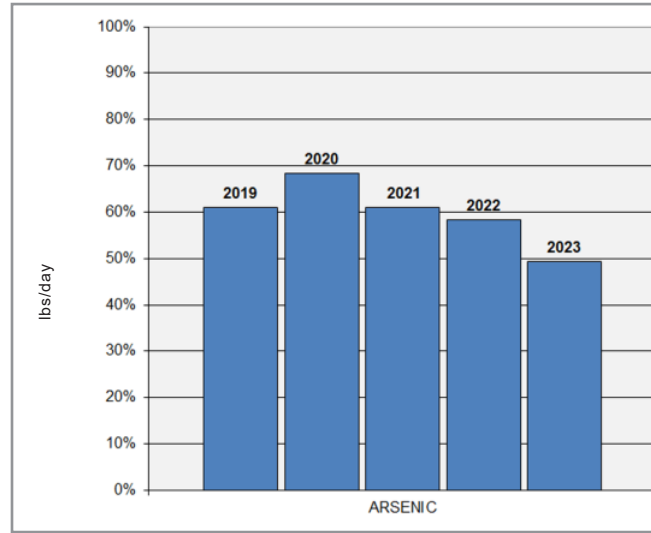
# MARTIN WAY RECLAIMED WATER PLANT INFLUENT METALS LOADING TRENDS 2019-2023



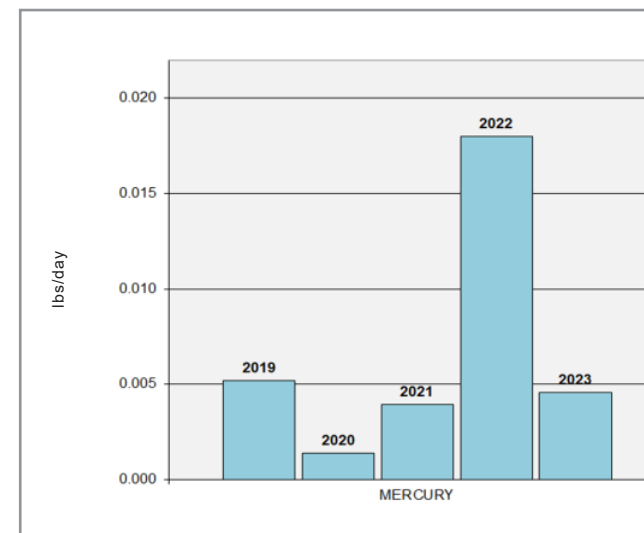
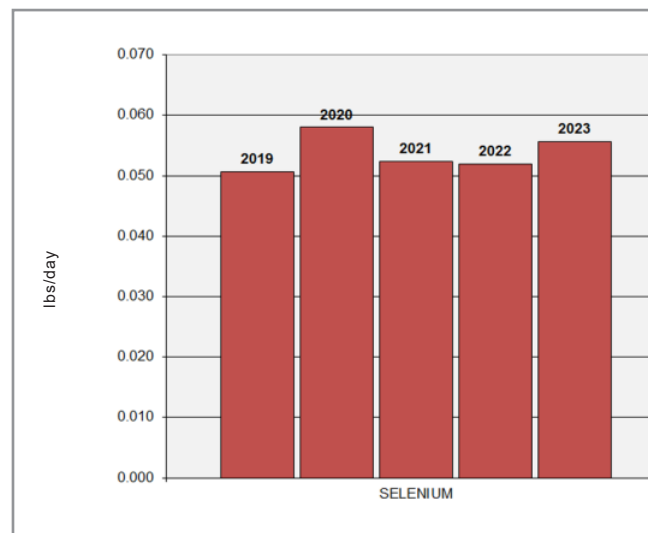
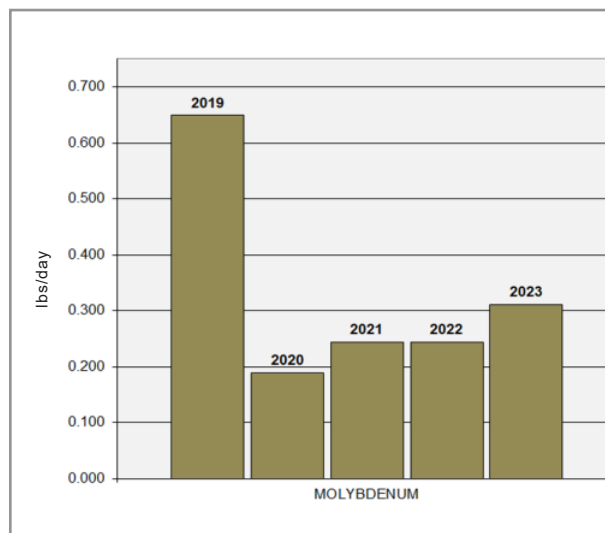
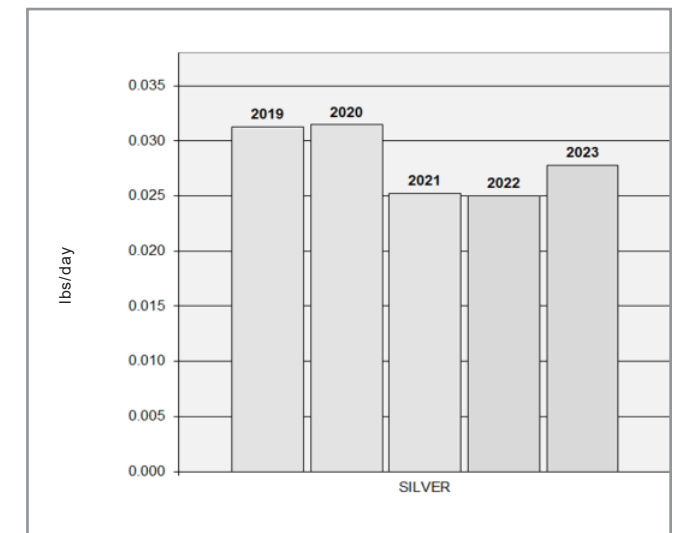
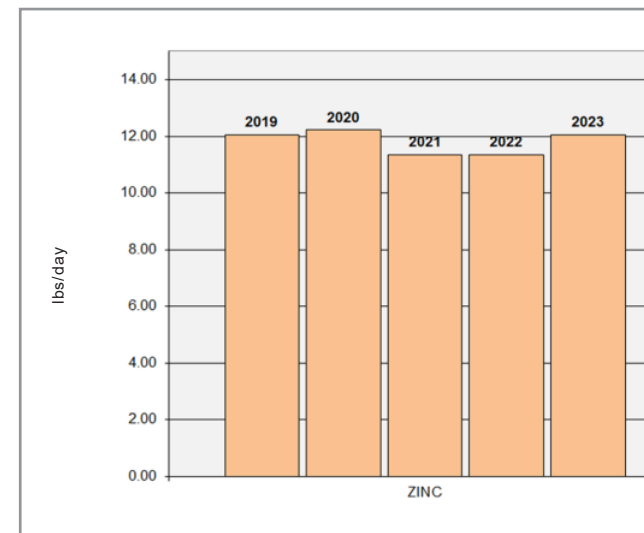
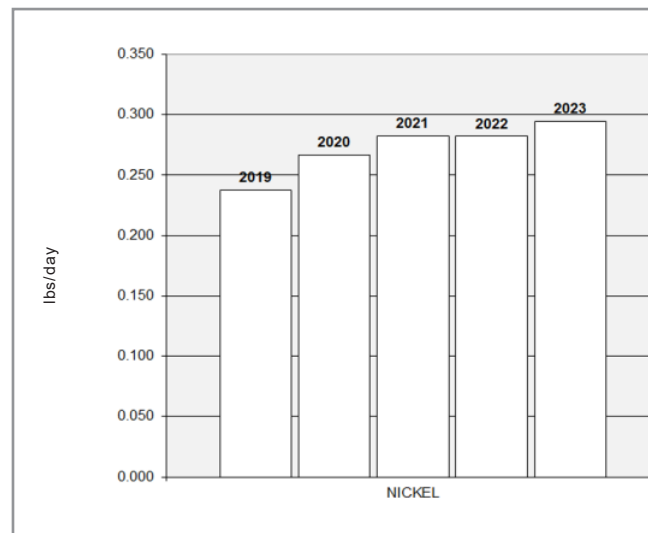
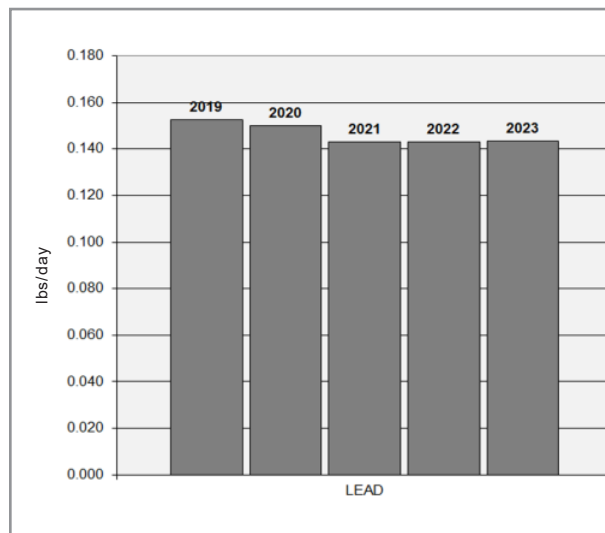
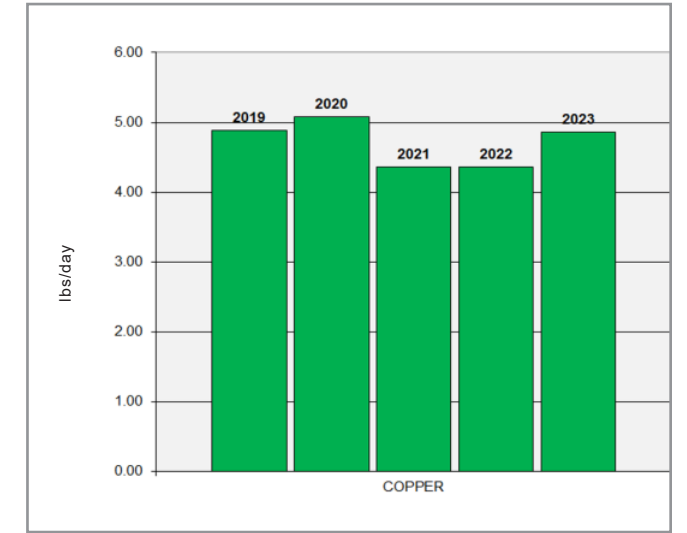
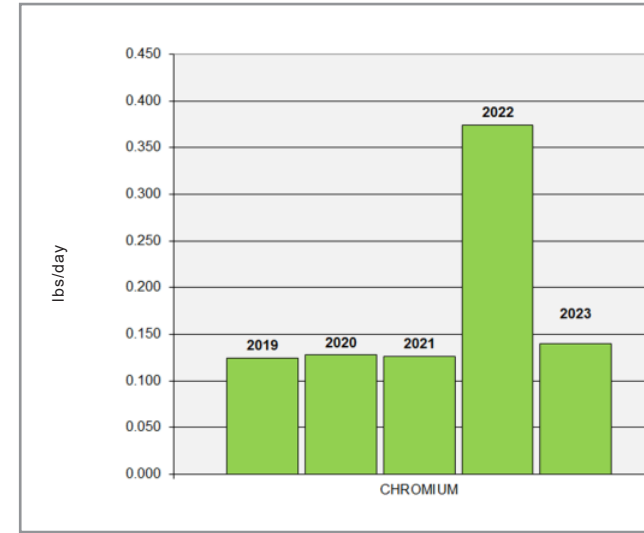
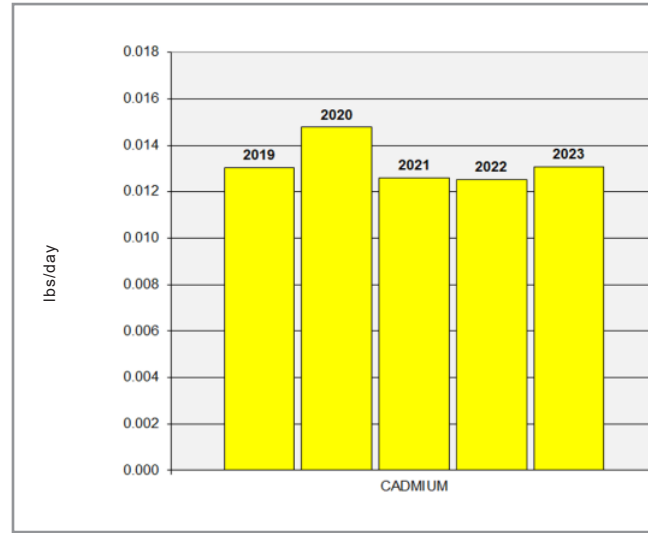
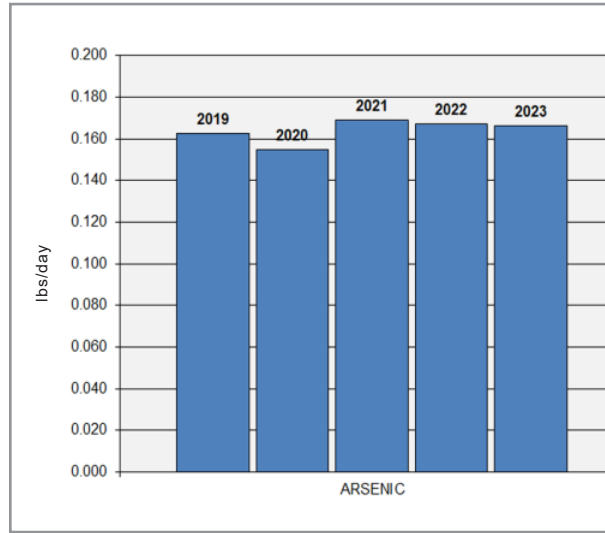
# MARTIN WAY RECLAIMED WATER PLANT FINAL EFFLUENT METALS LOADING TRENDS 2019-2023



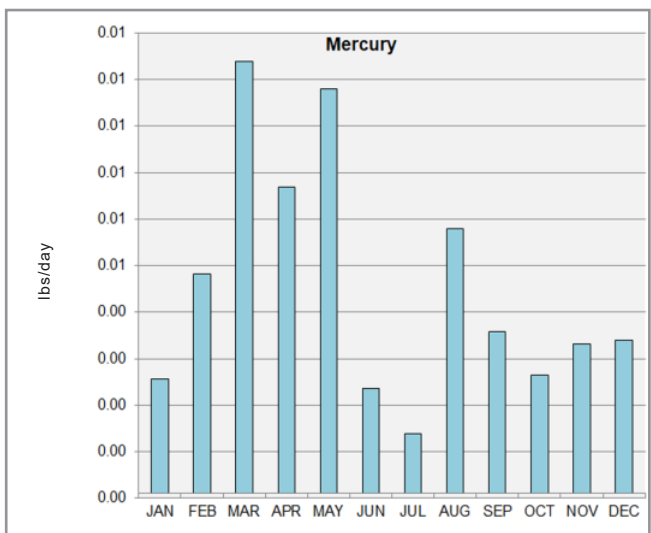
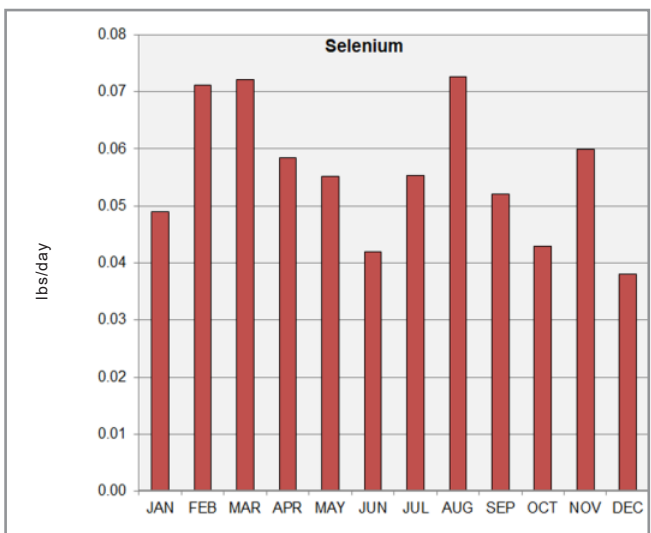
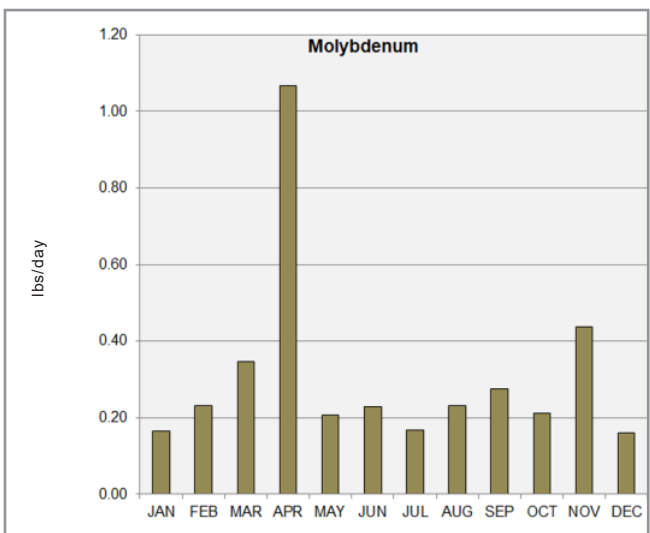
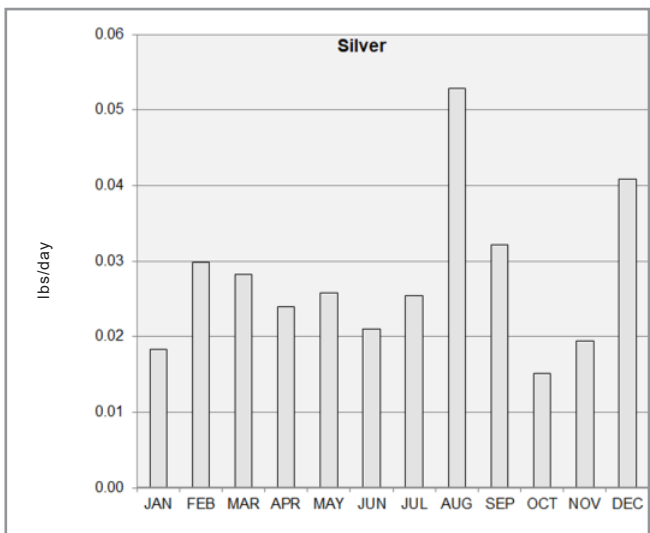
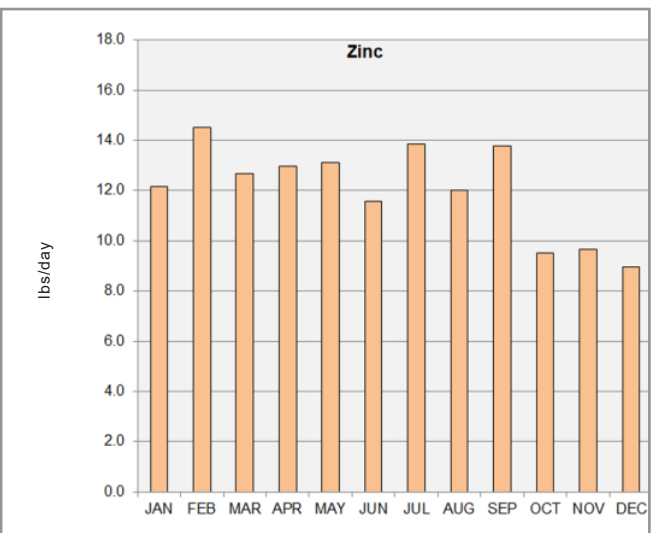
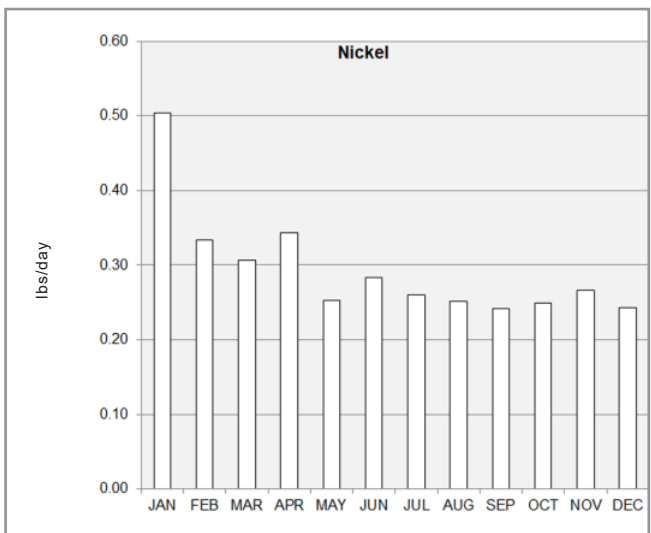
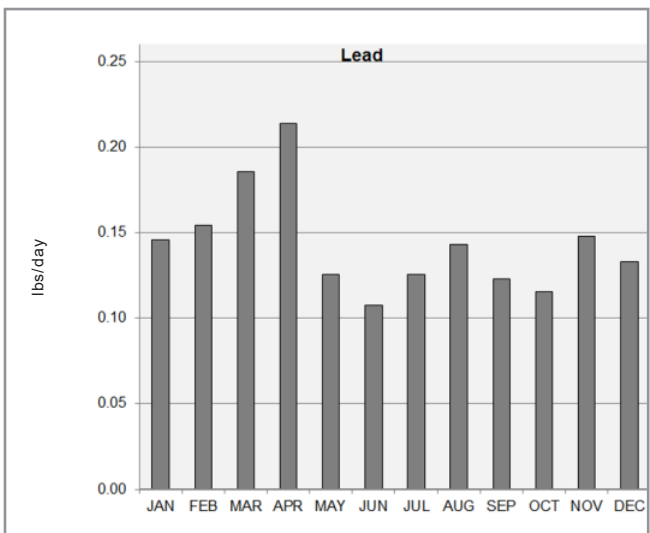
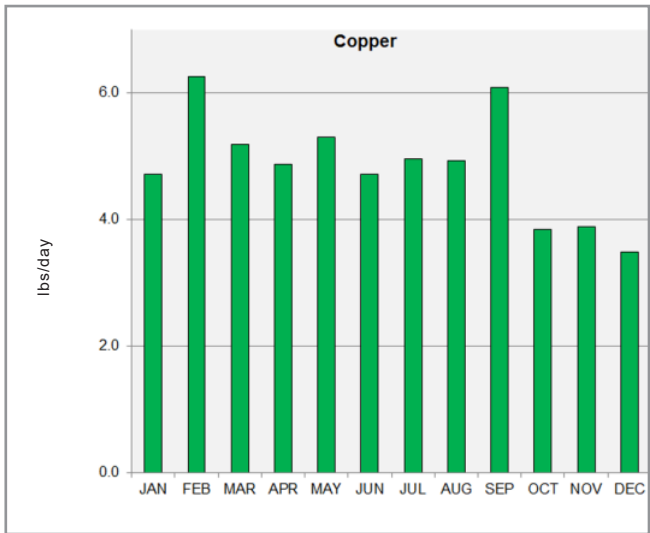
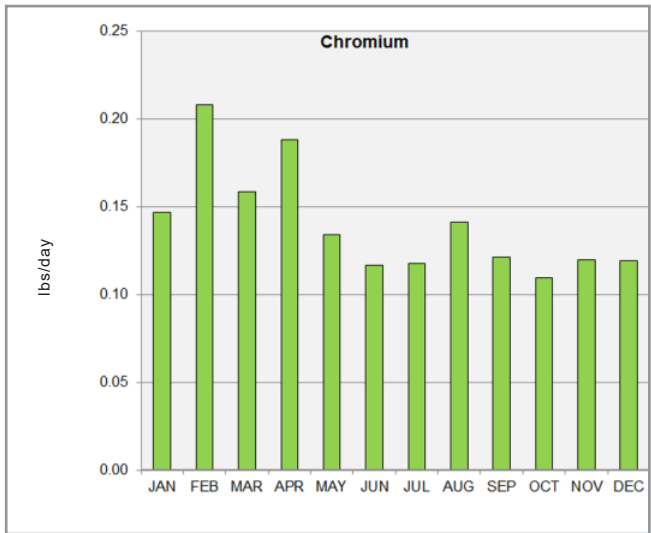
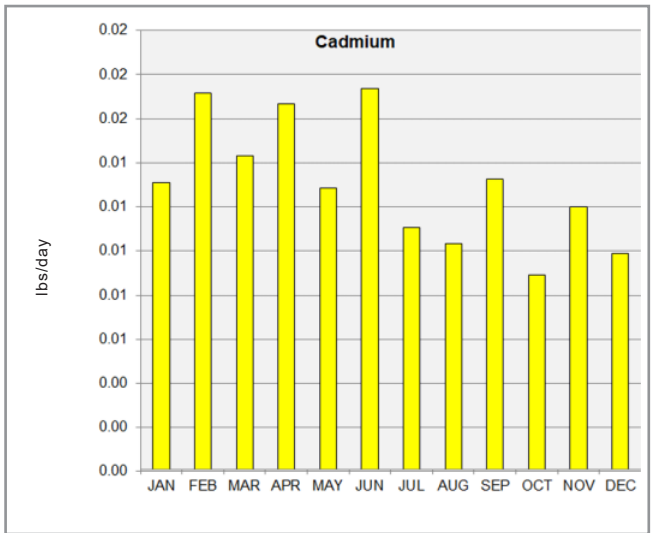
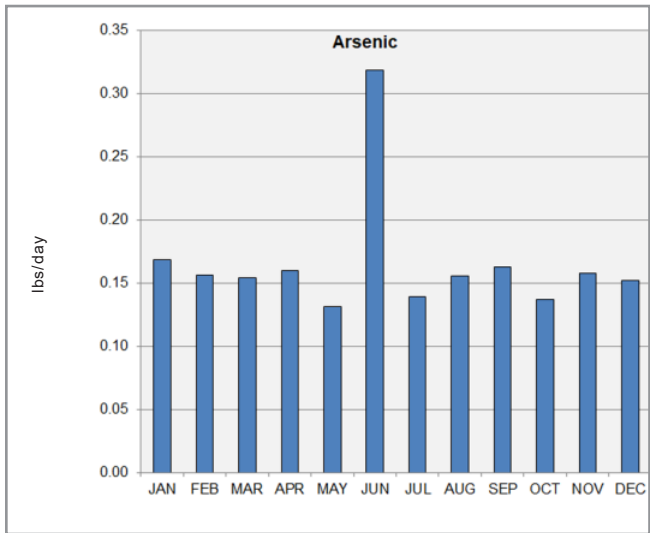
# MARTIN WAY RECLAIMED WATER PLANT REMOVAL EFFICIENCY TRENDS 2019-2023



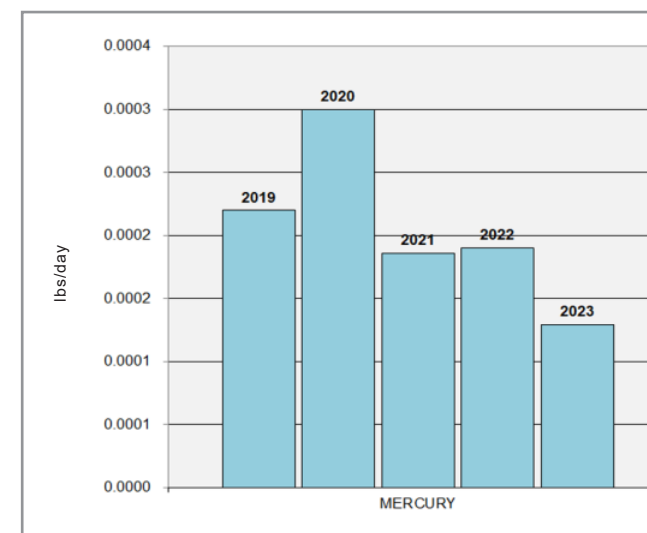
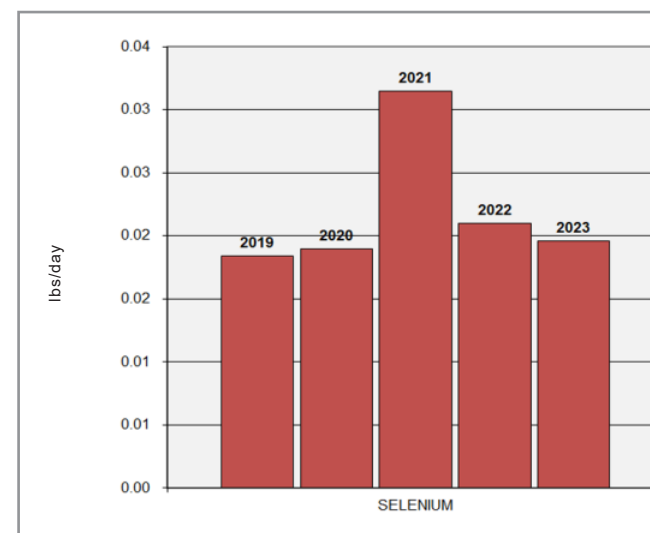
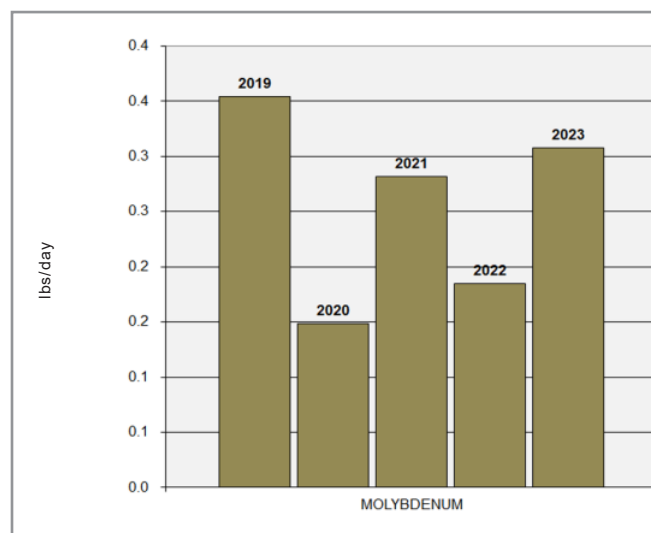
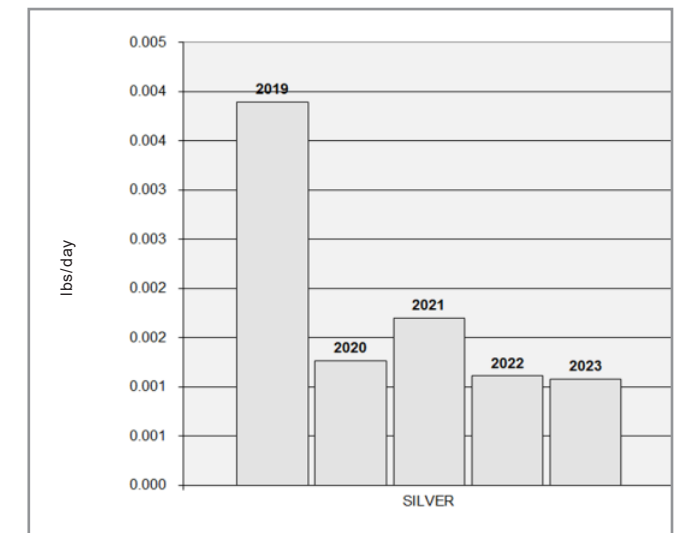
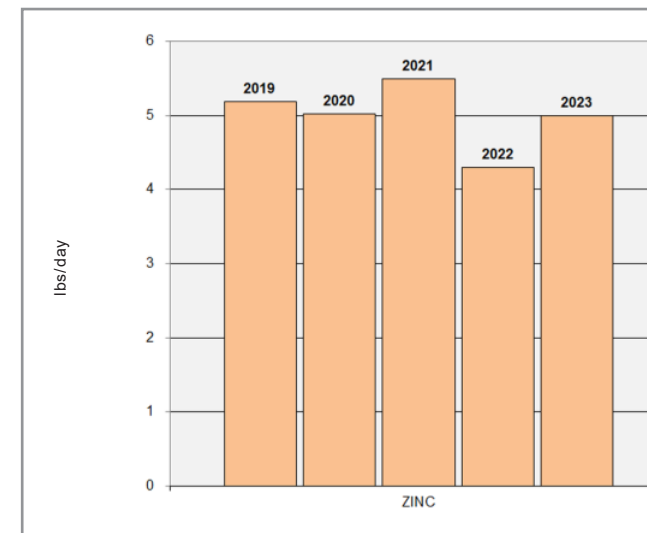
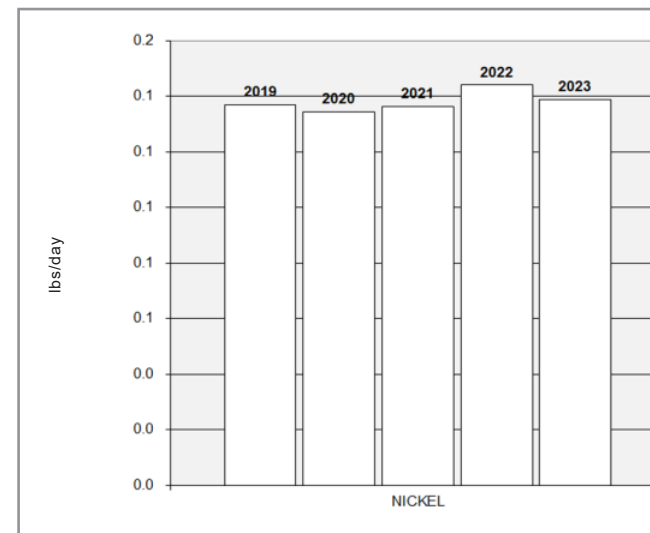
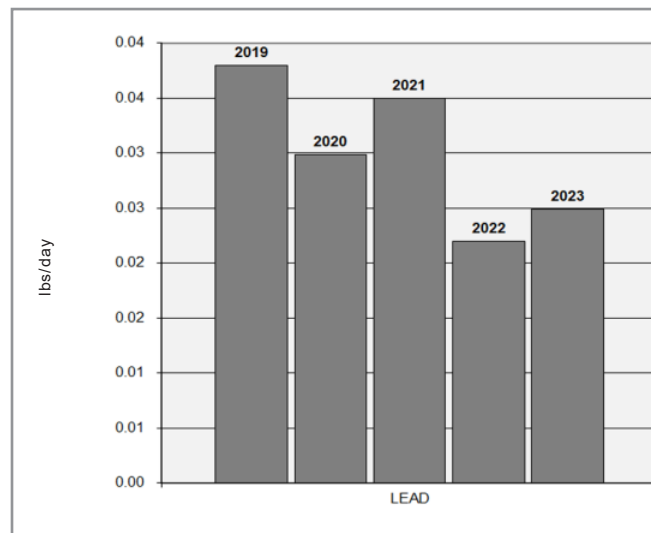
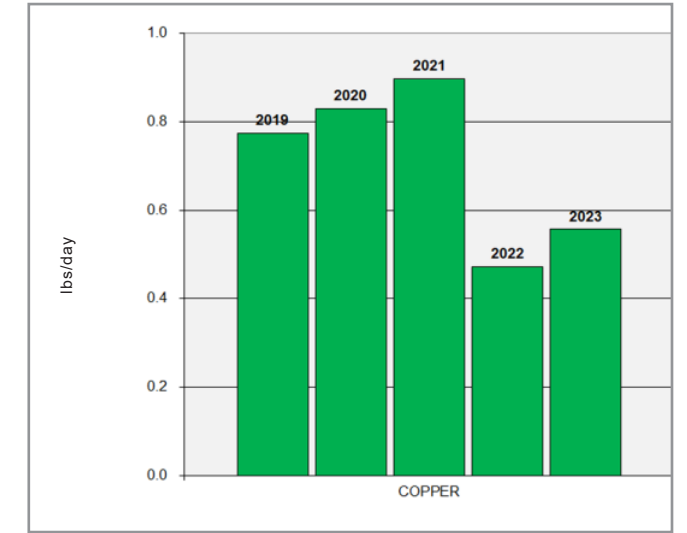
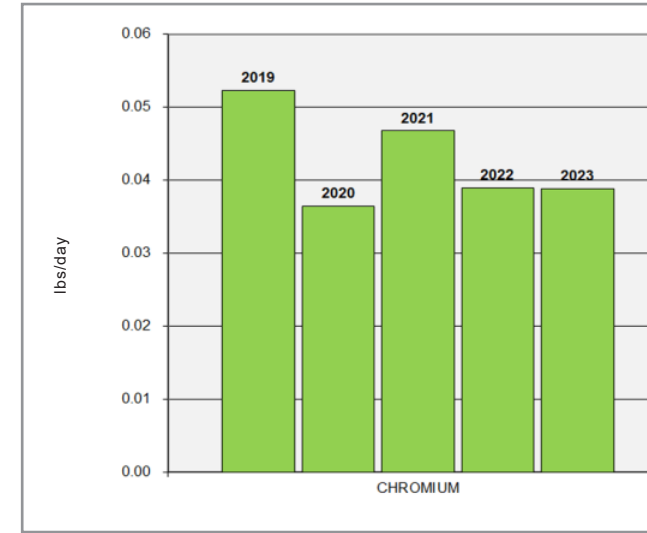
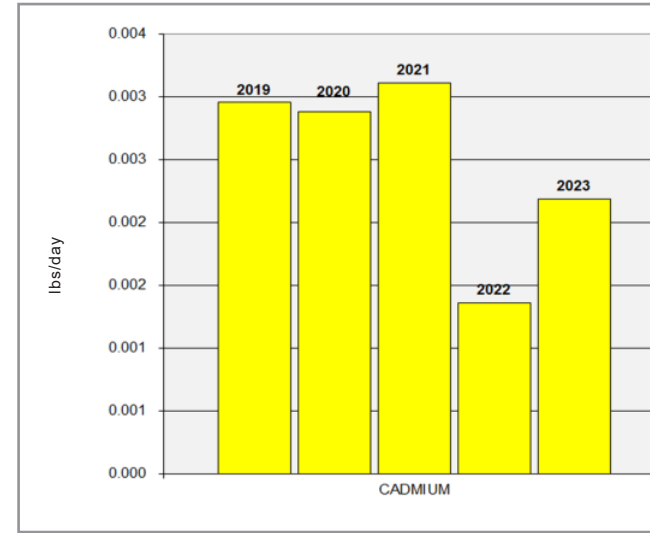
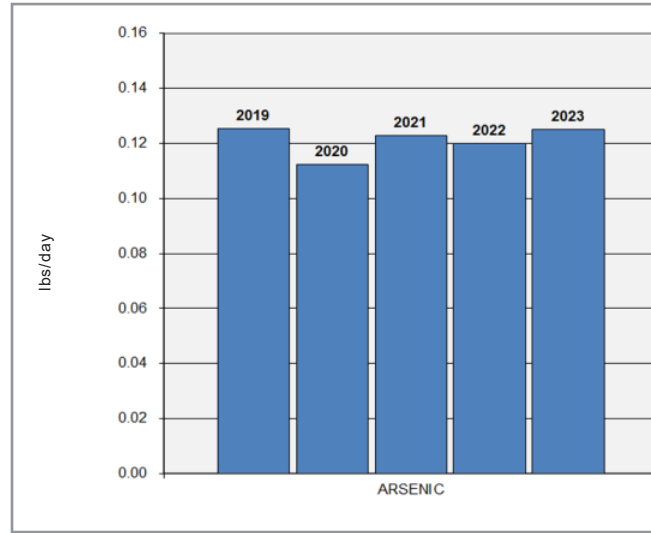
# BUDD INLET TREATMENT PLANT INFLUENT METALS LOADING TRENDS 2019-2023



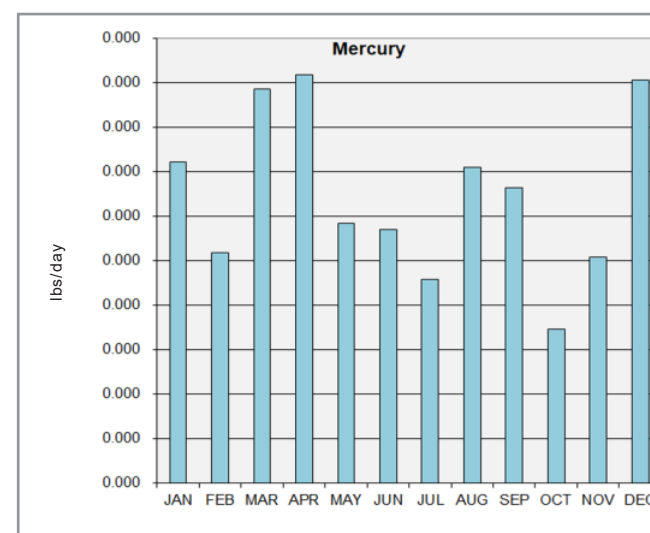
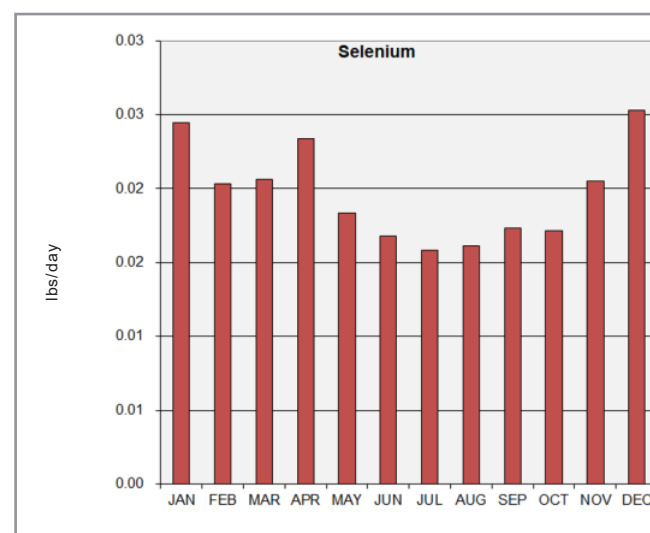
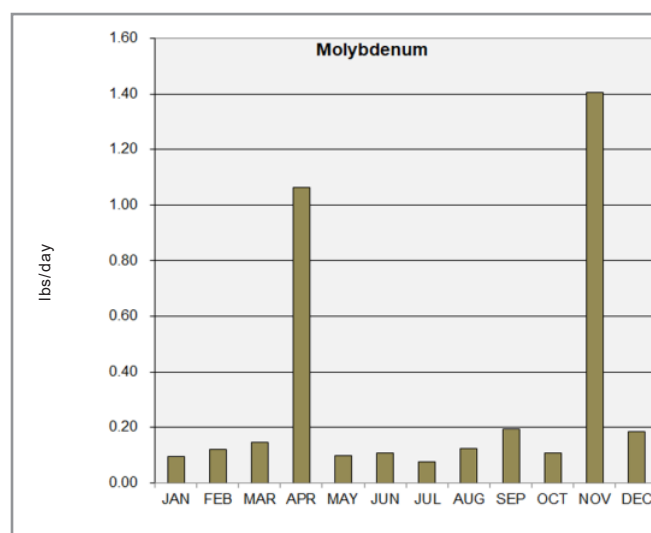
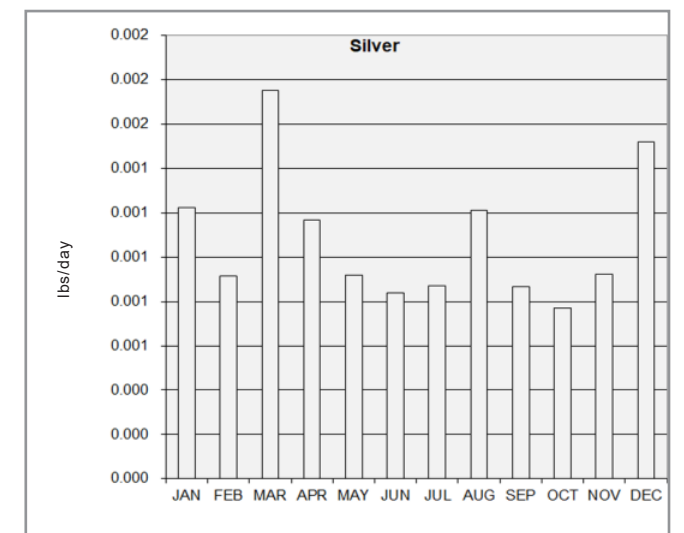
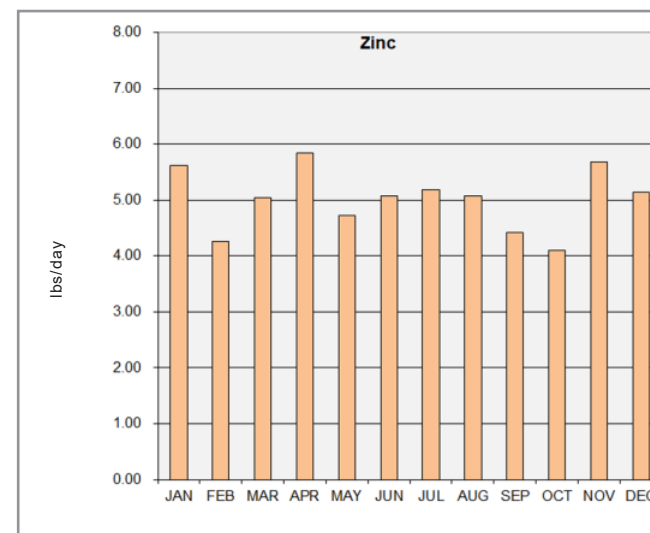
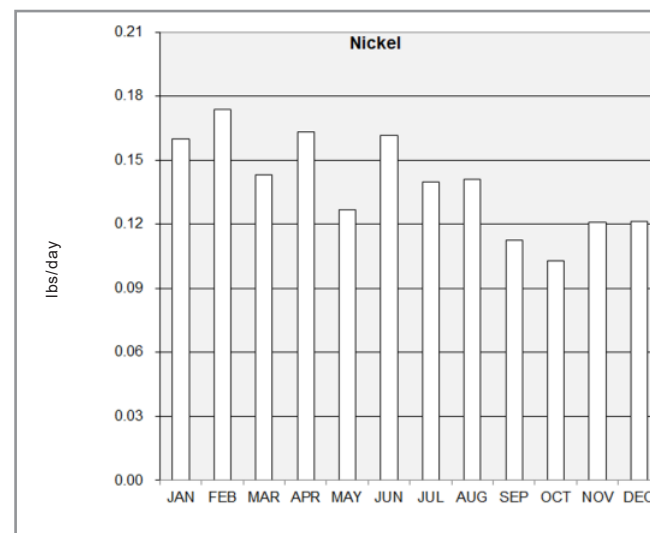
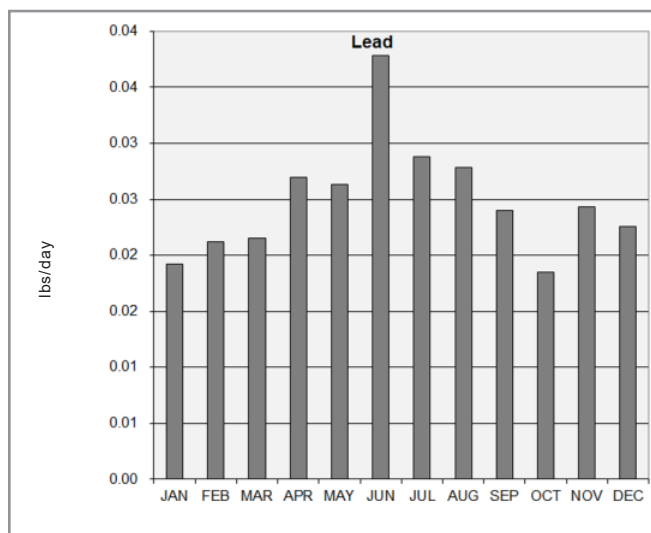
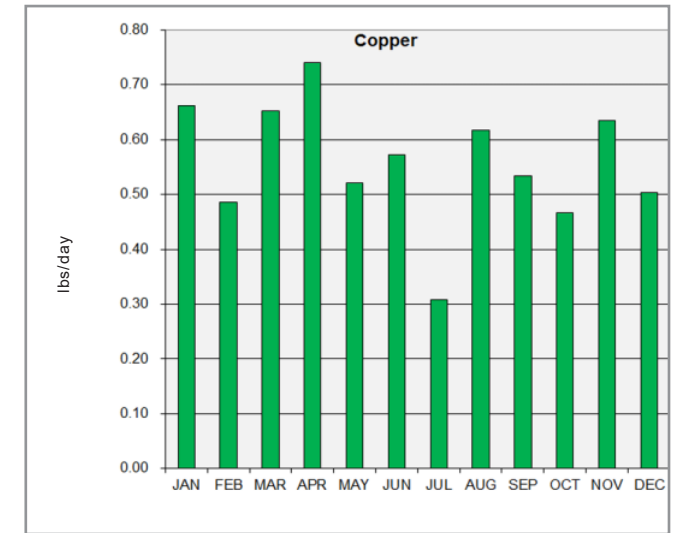
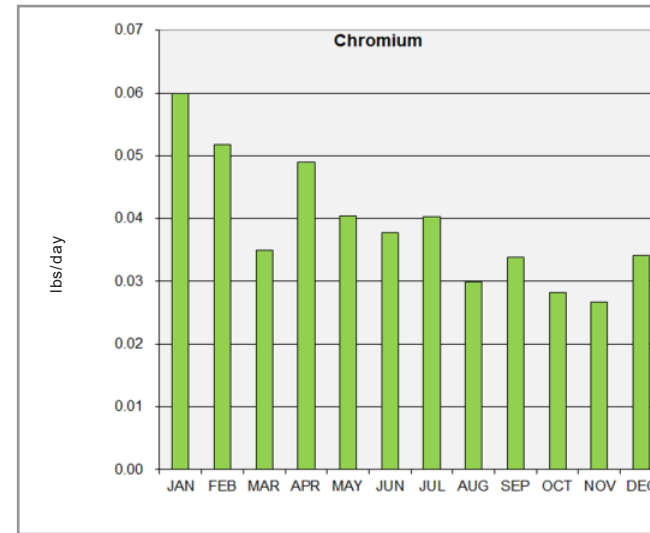
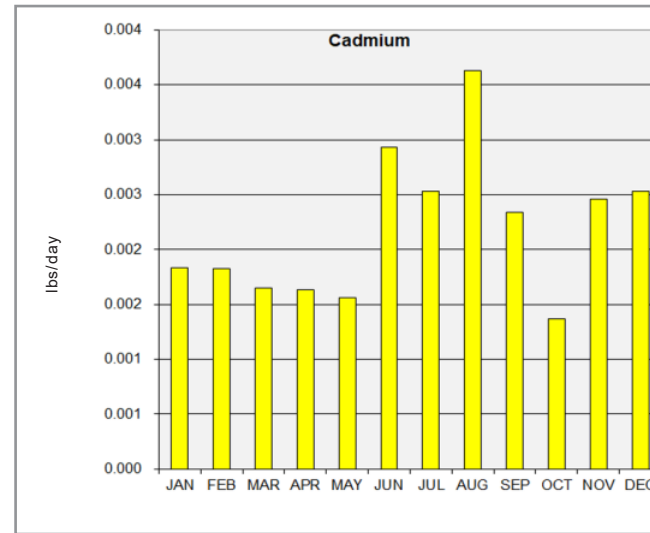
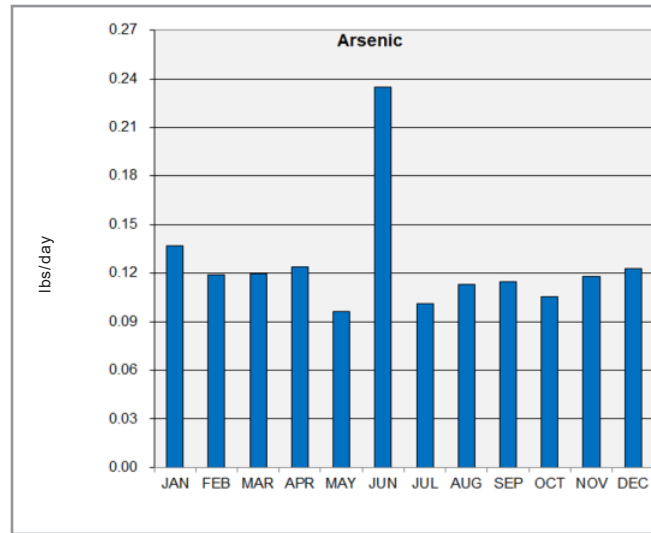
# BUDD INLET TREATMENT PLANT INFLUENT METALS LOADINGS JANUARY-DECEMBER 2023



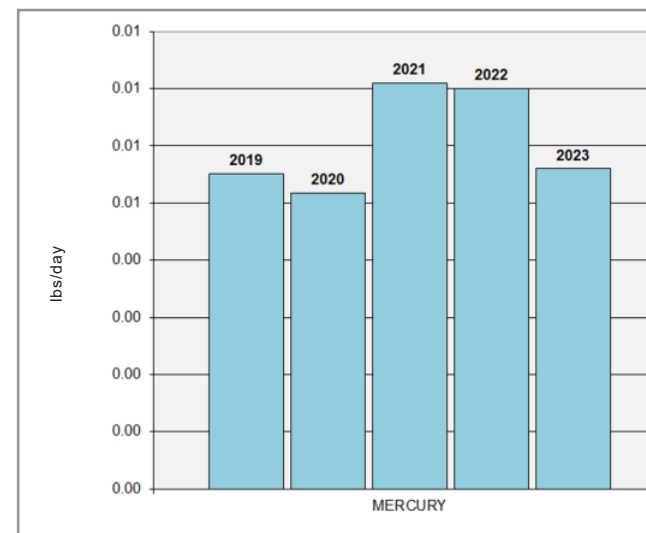
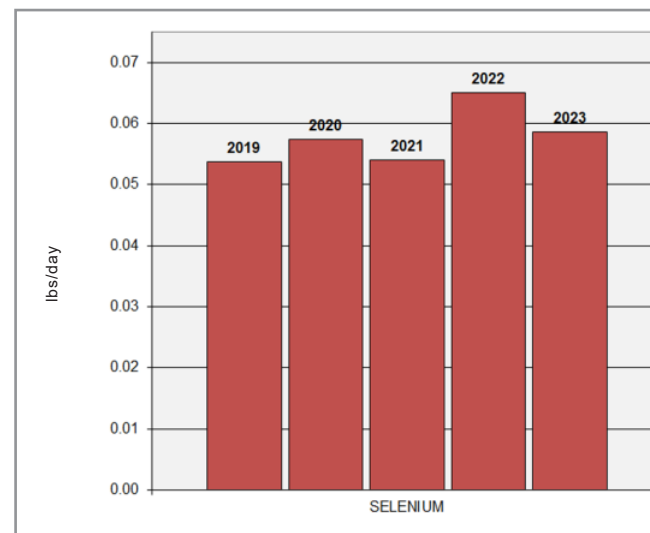
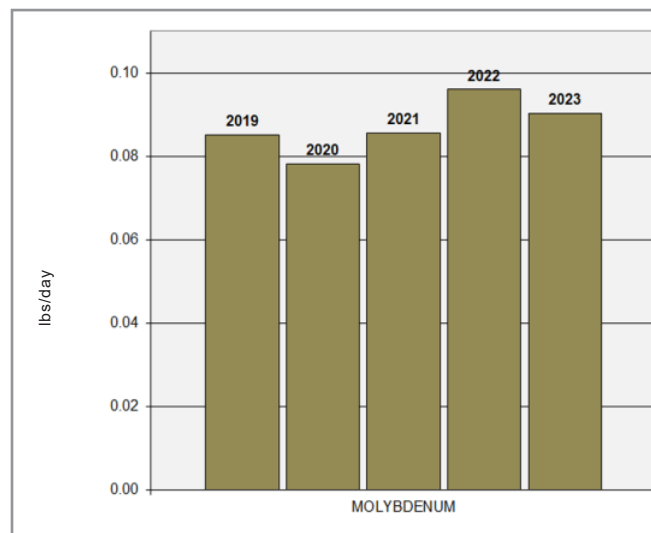
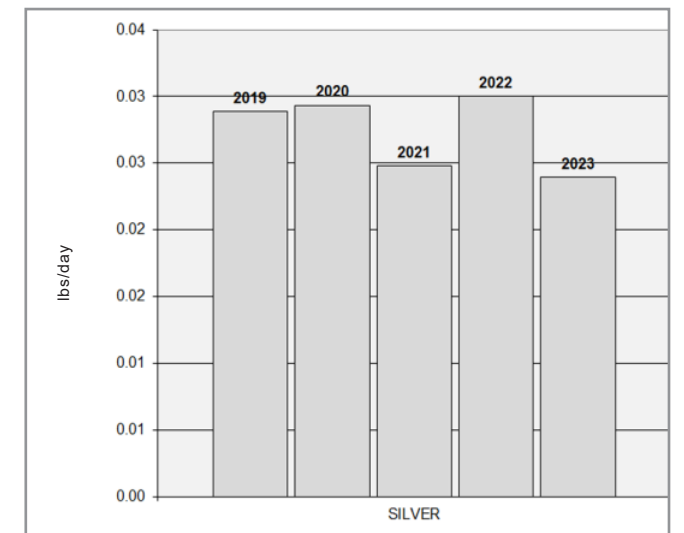
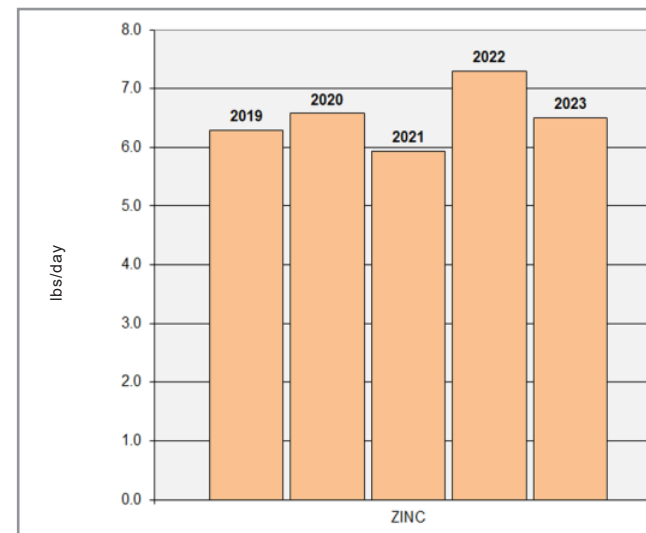
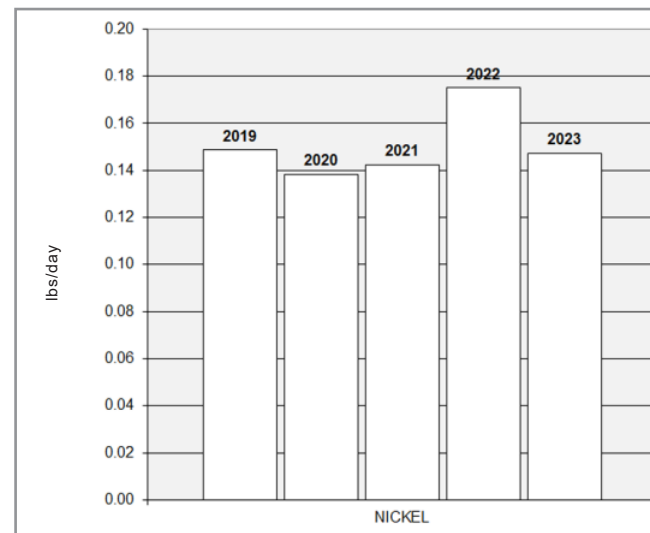
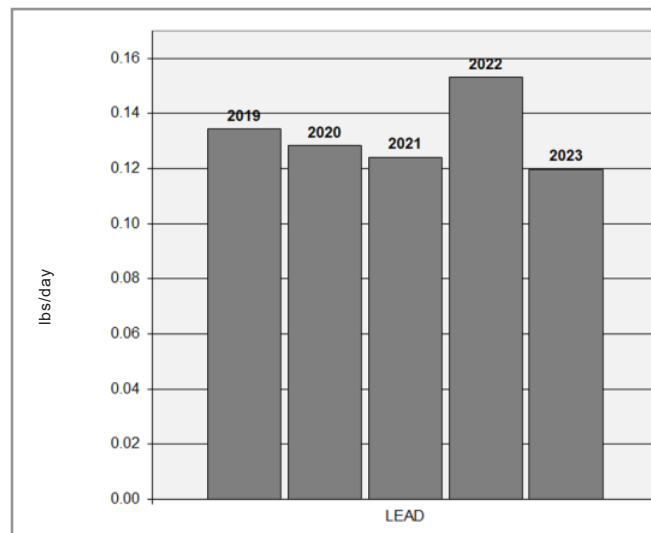
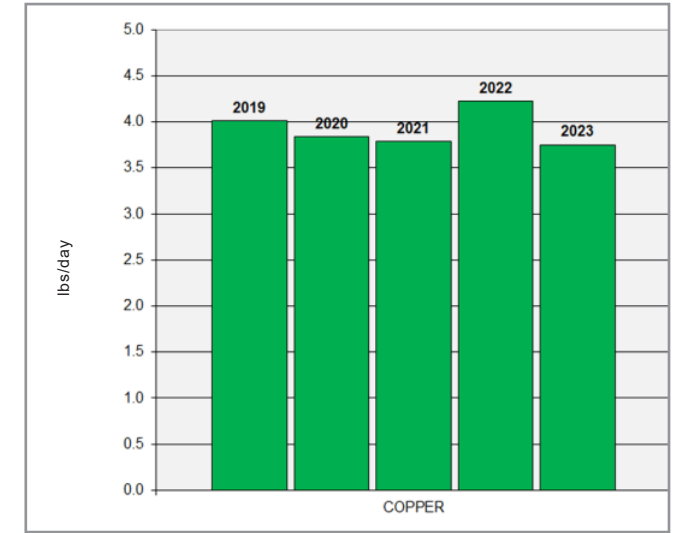
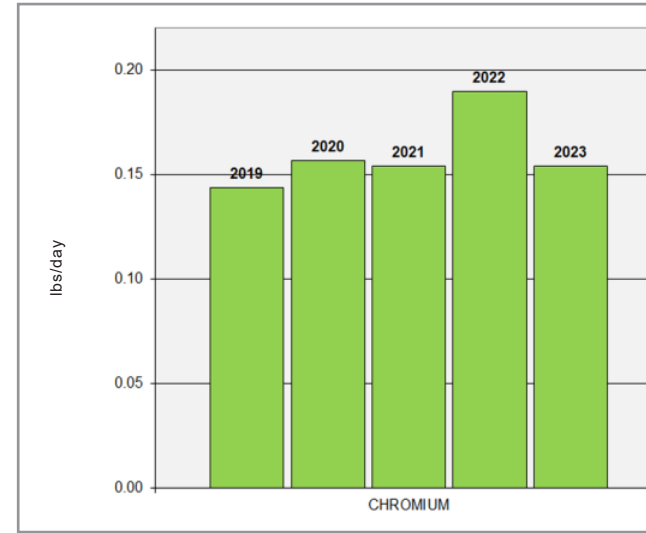
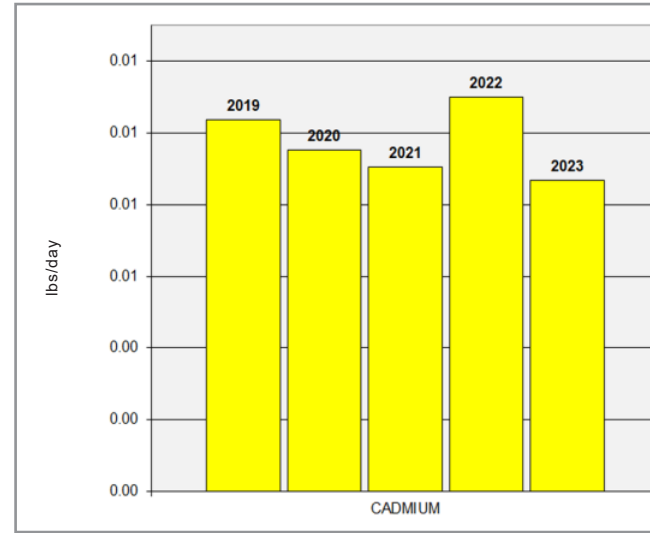
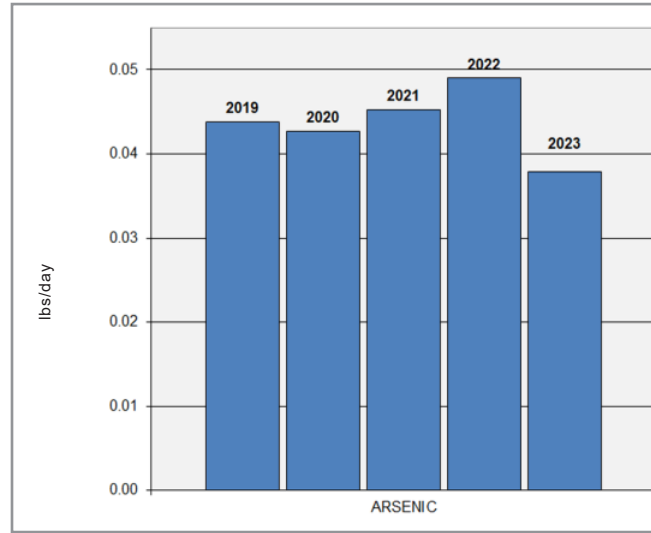
# BUDD INLET TREATMENT PLANT FINAL EFFLUENT METALS LOADING TRENDS 2019-2023



# BUDD INLET TREATMENT PLANT FINAL EFFLUENT METALS LOADINGS JANUARY-DECEMBER 2023

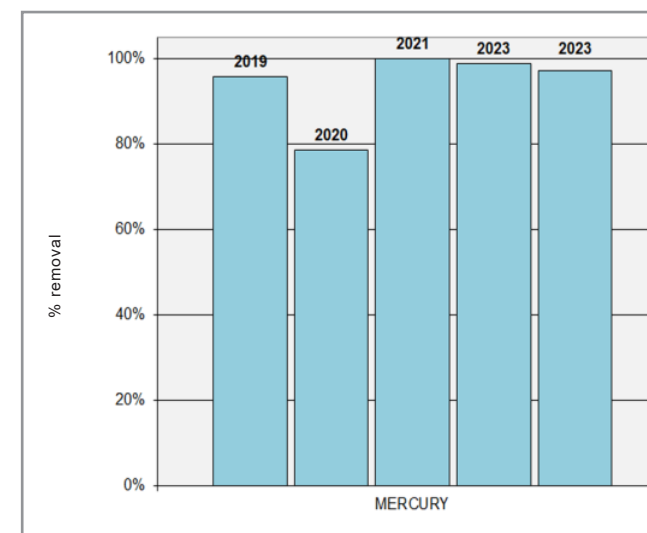
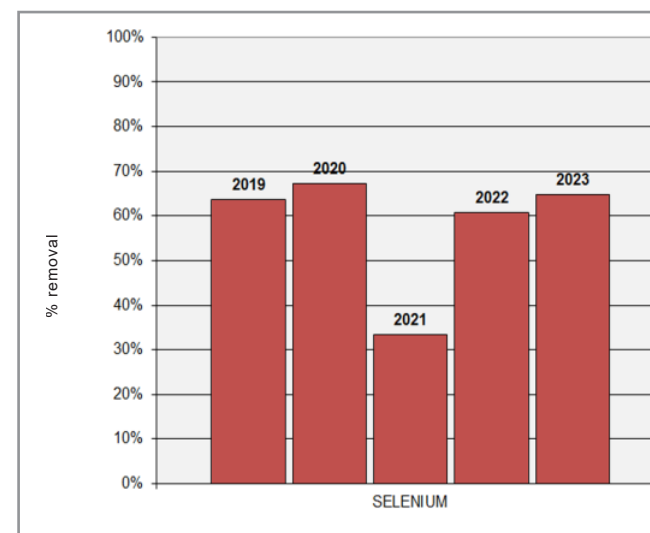
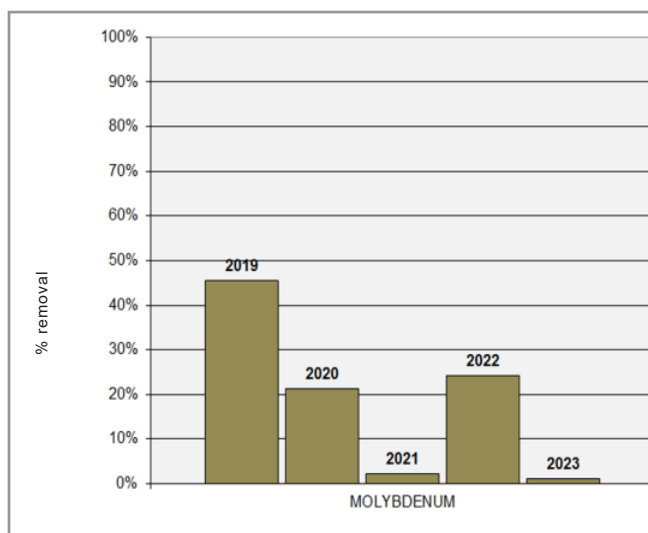
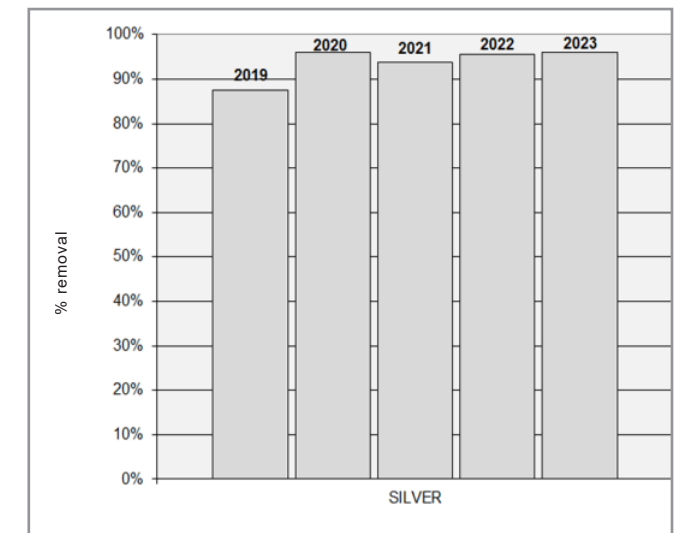
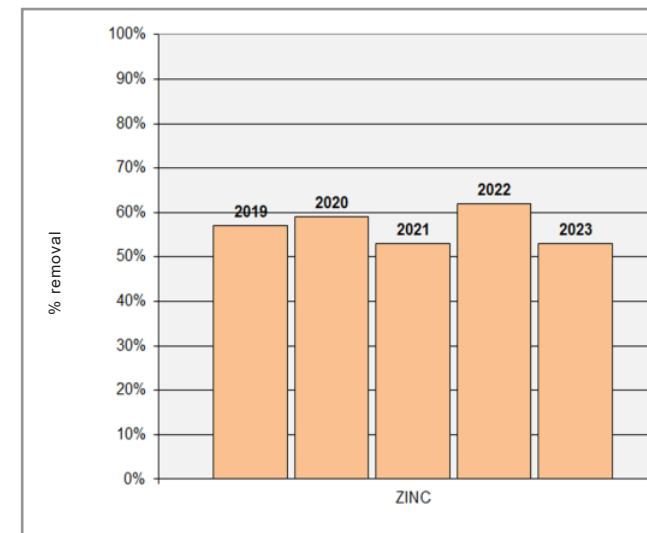
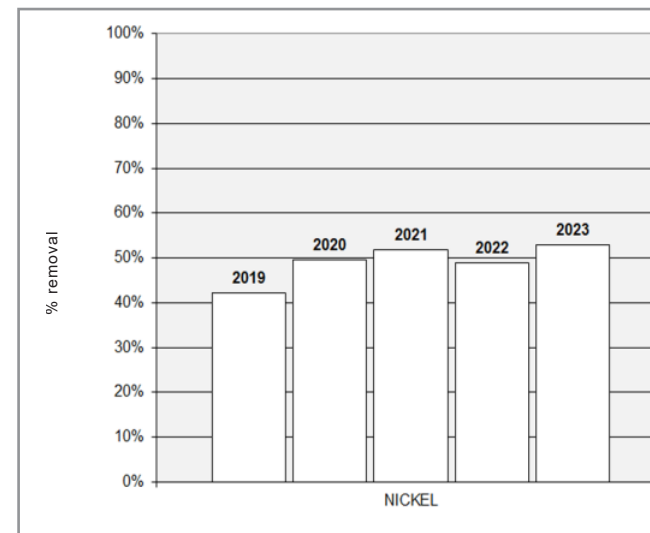
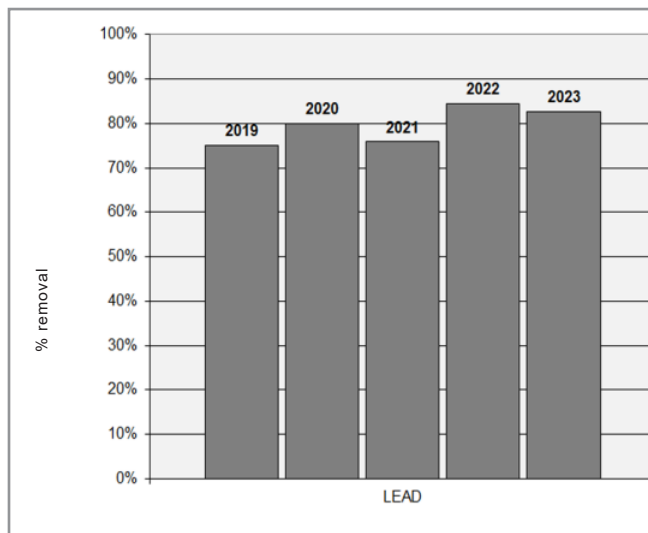
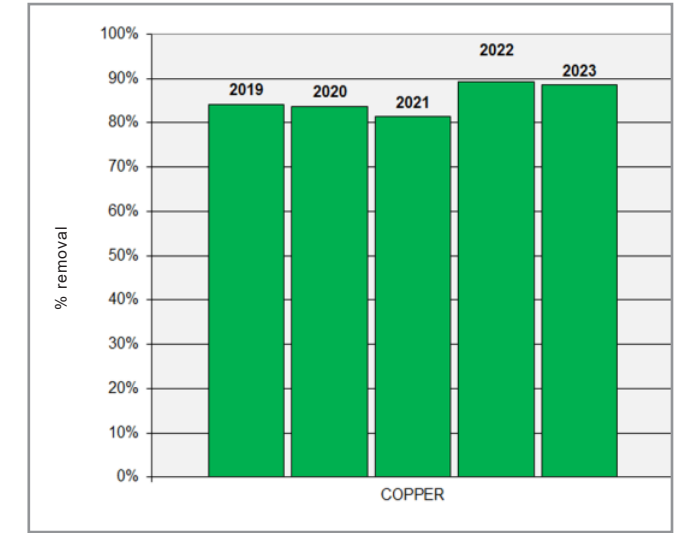
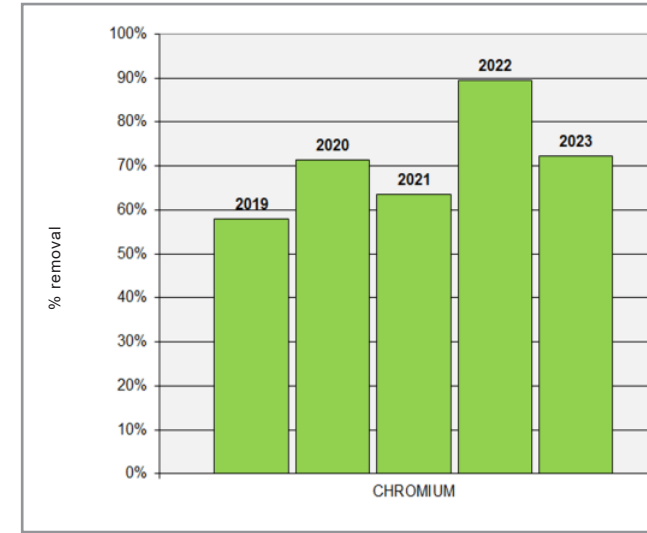
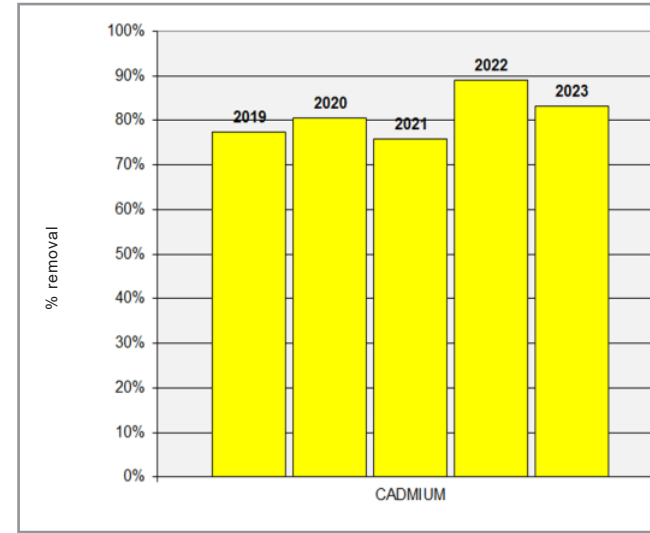
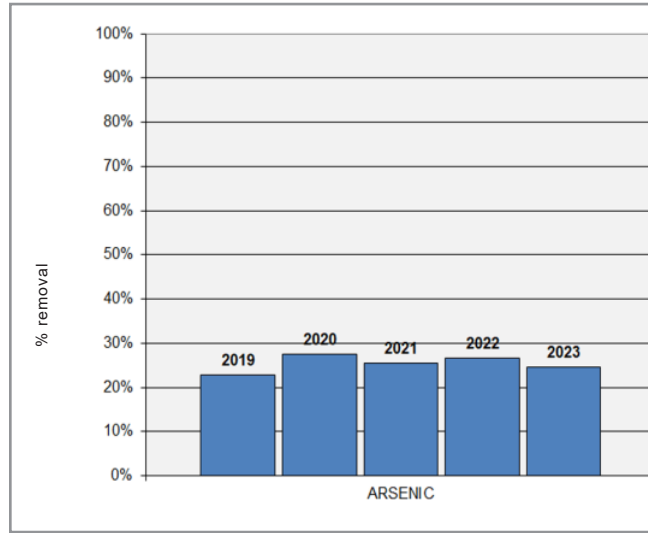


# BUDD INLET TREATMENT PLANT BIOSOLIDS METALS LOADING TRENDS 2019-2023

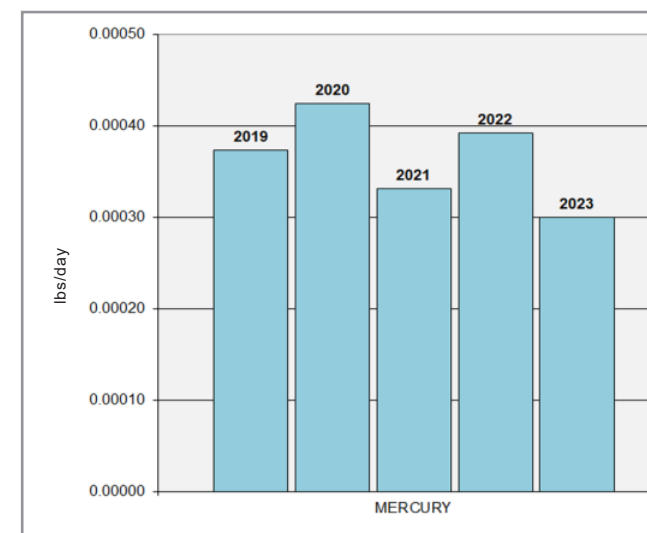
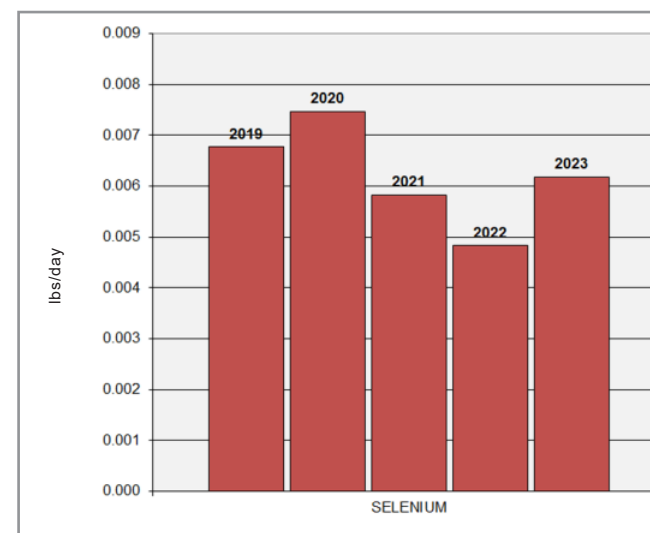
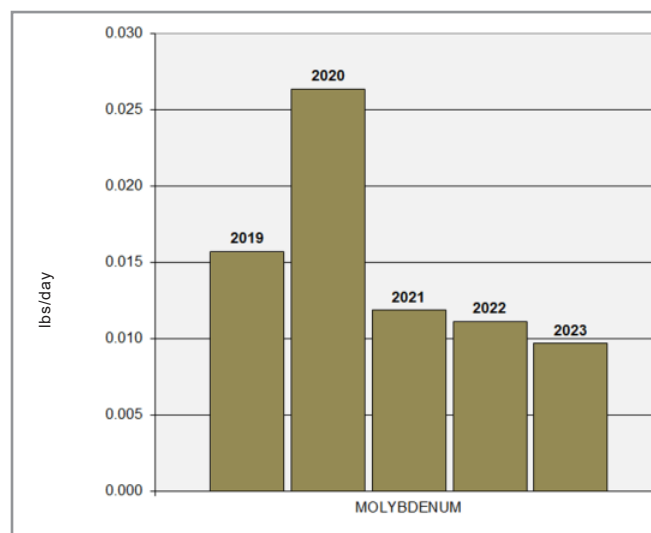
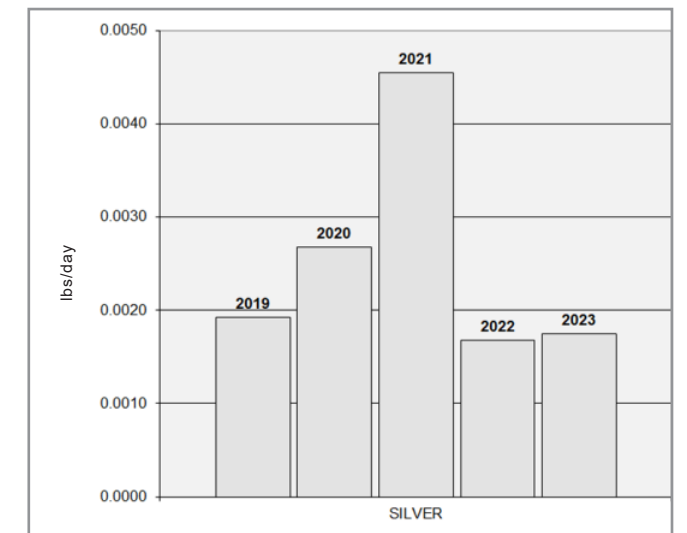
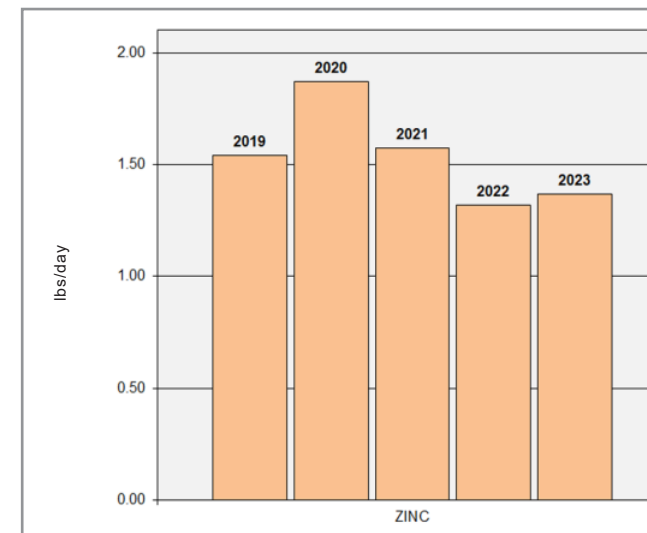
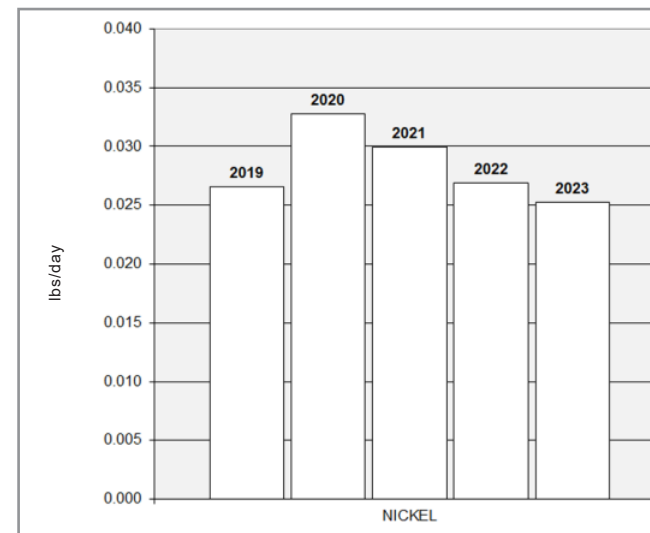
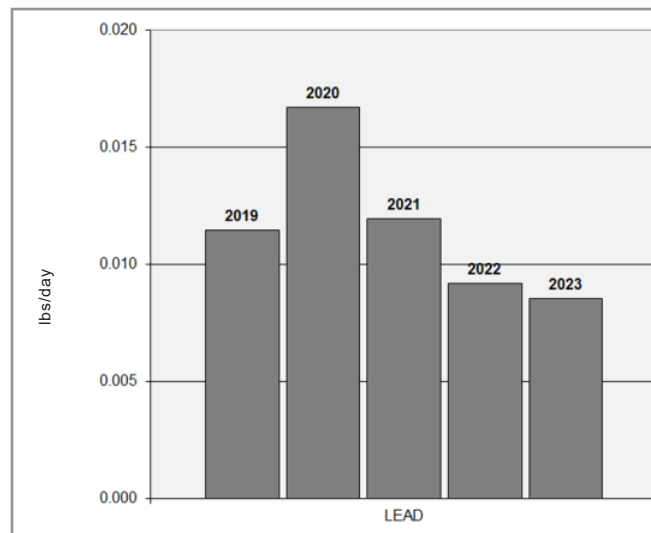
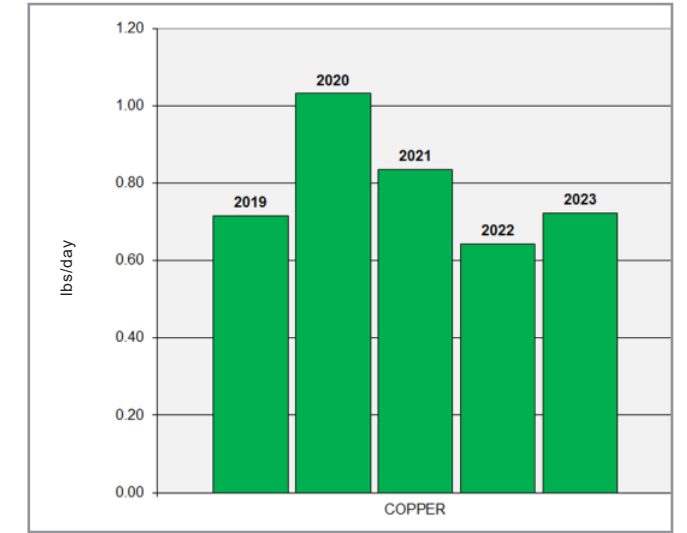
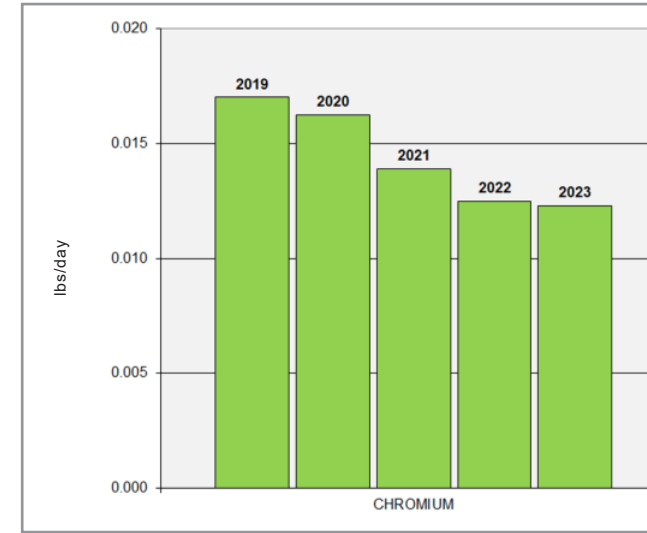
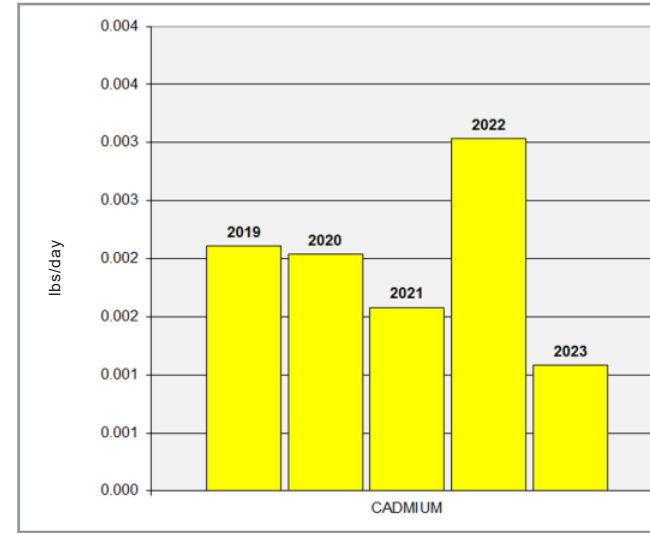
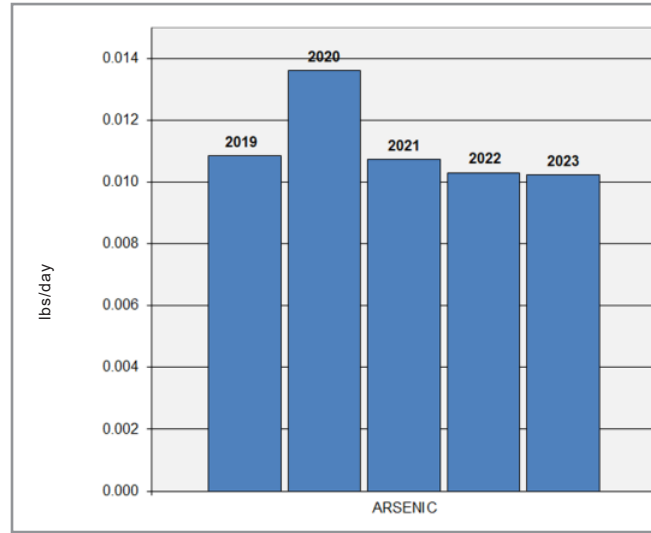




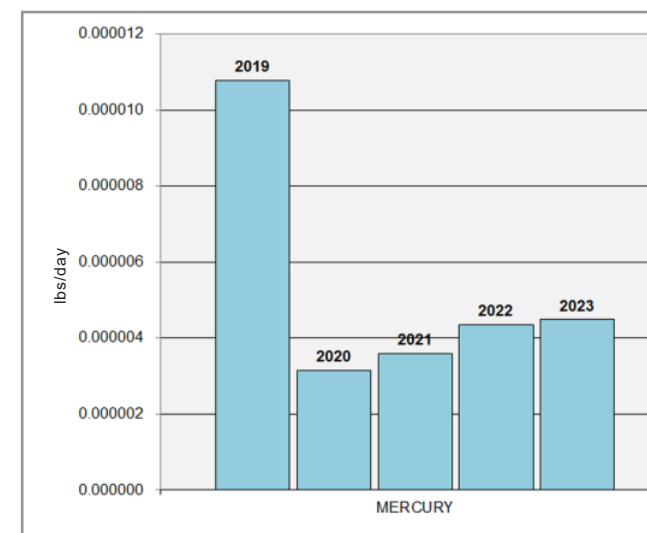
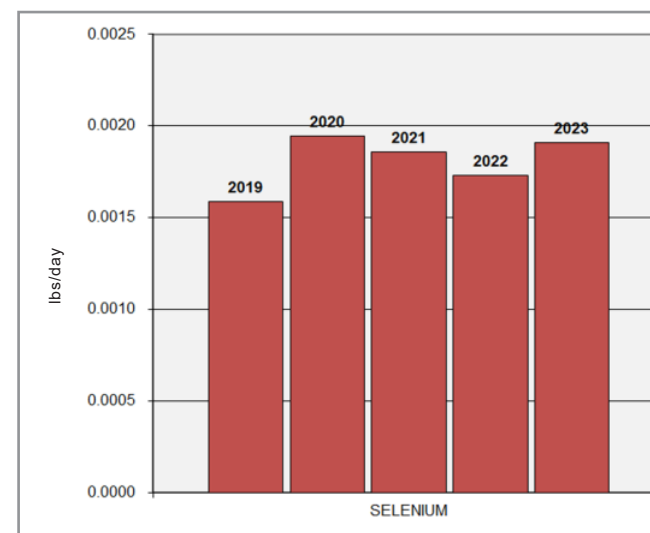
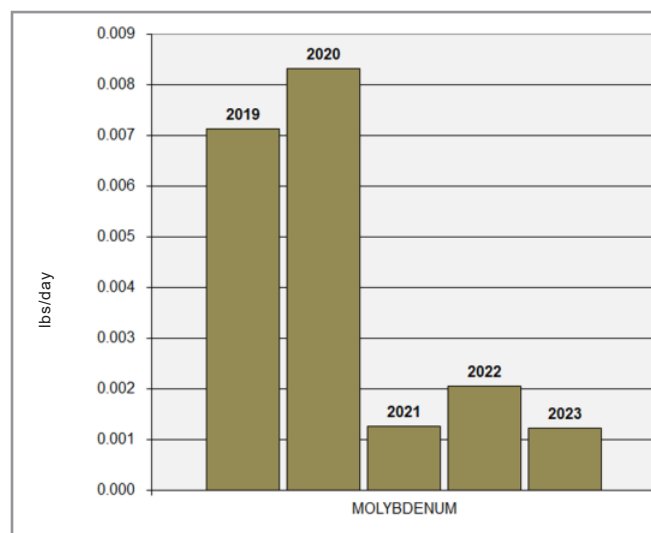
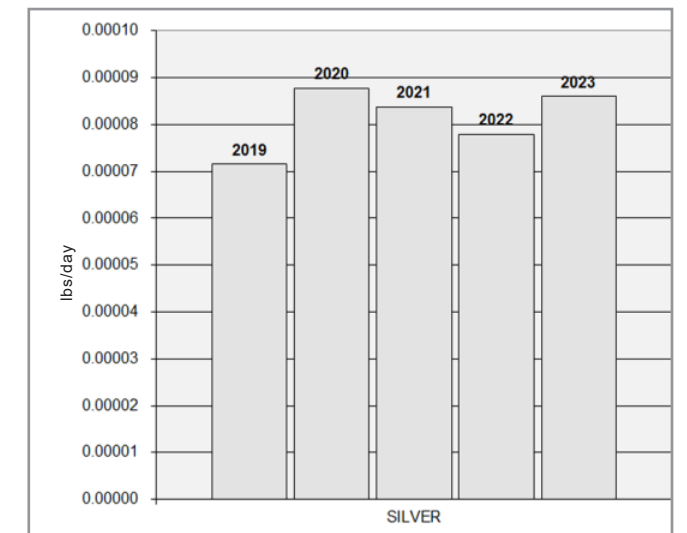
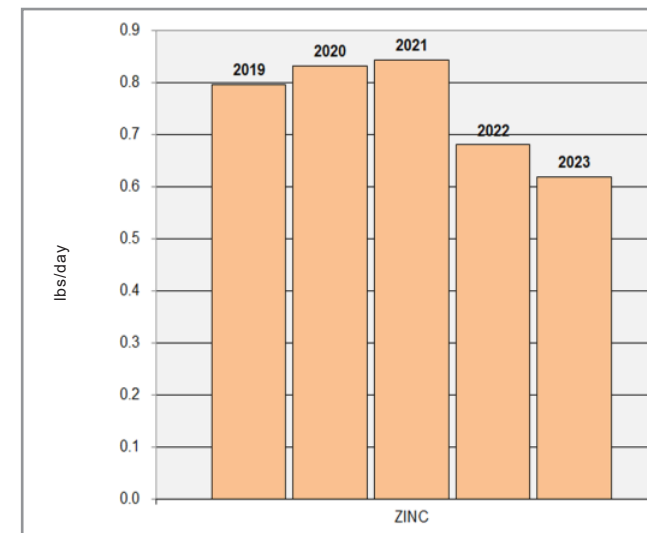
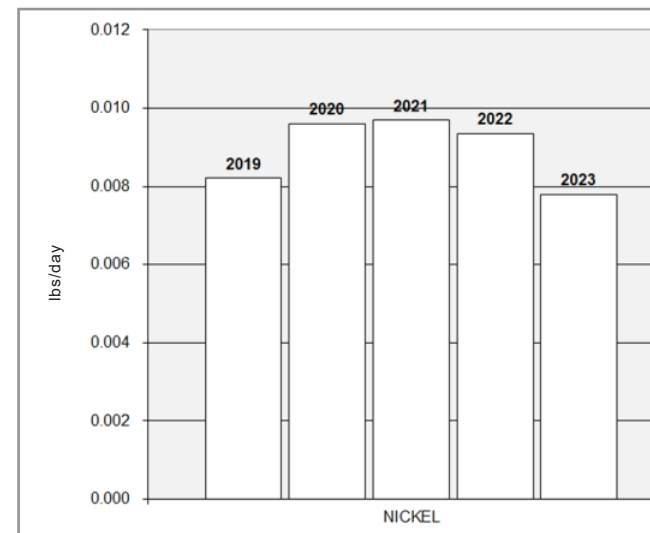
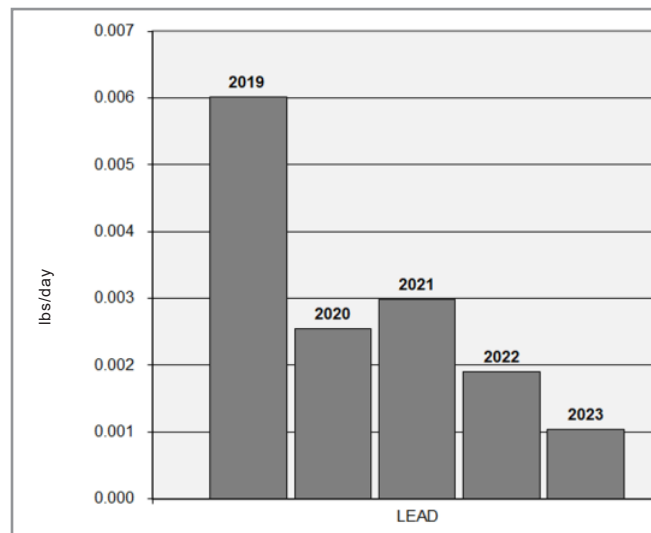
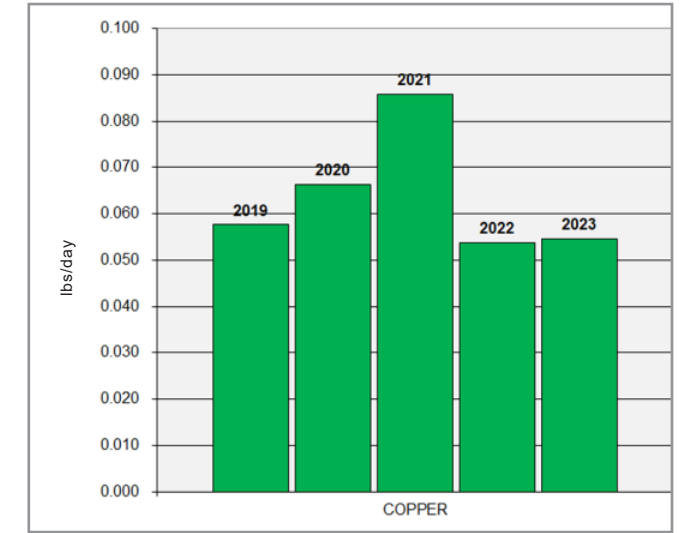
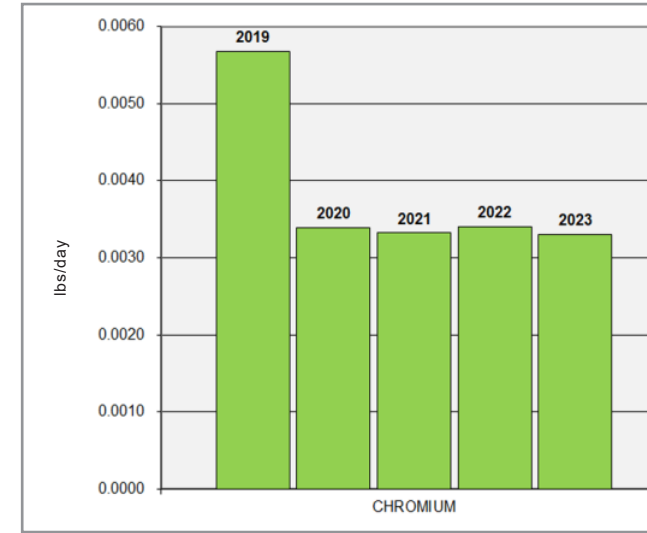
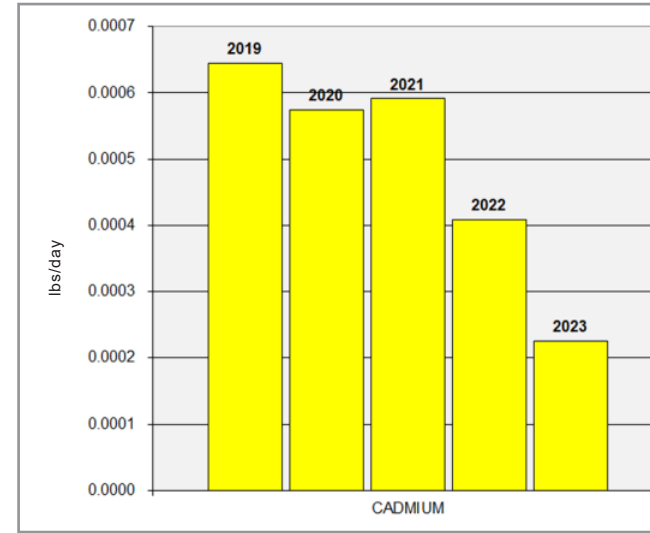
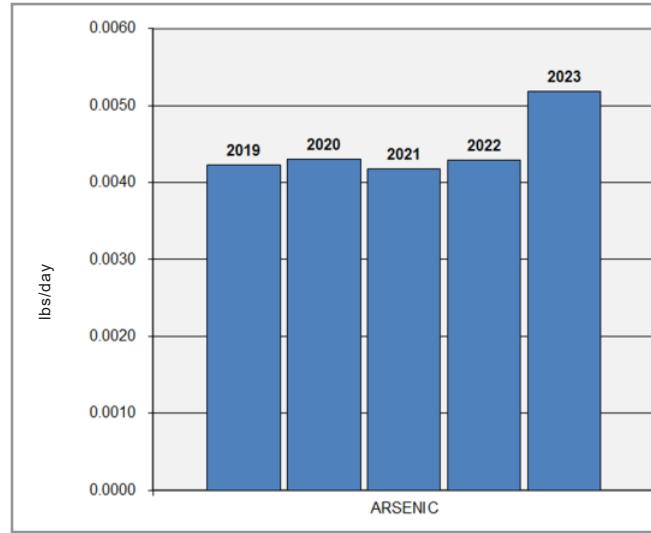
# BUDD INLET TREATMENT PLANT REMOVAL EFFICIENCY TRENDS 2019-2023



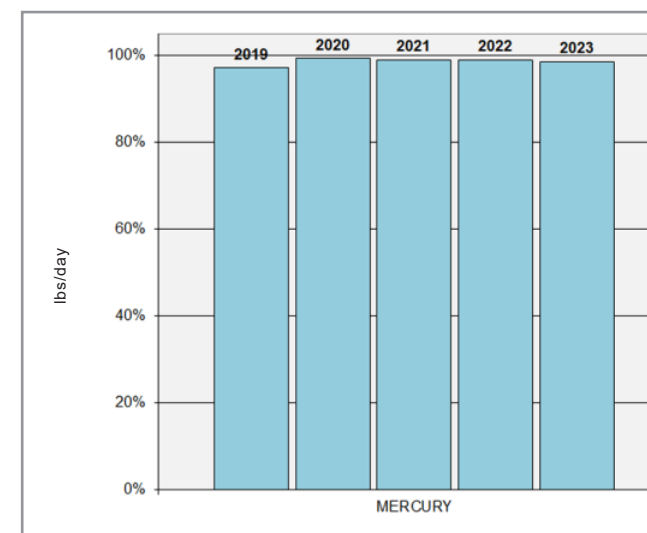
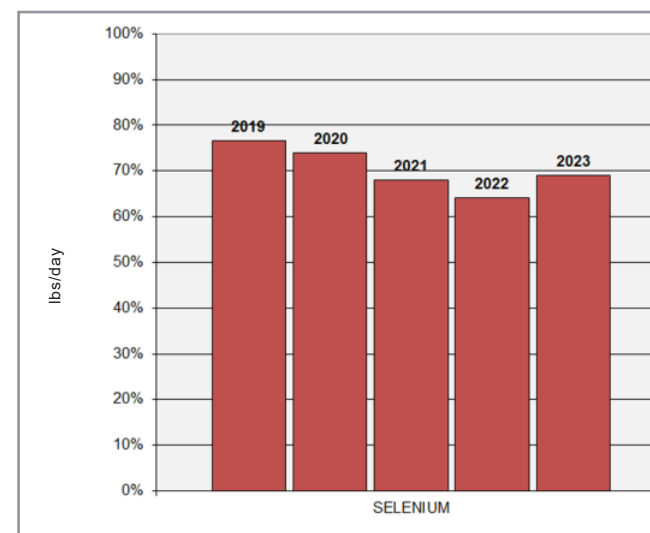
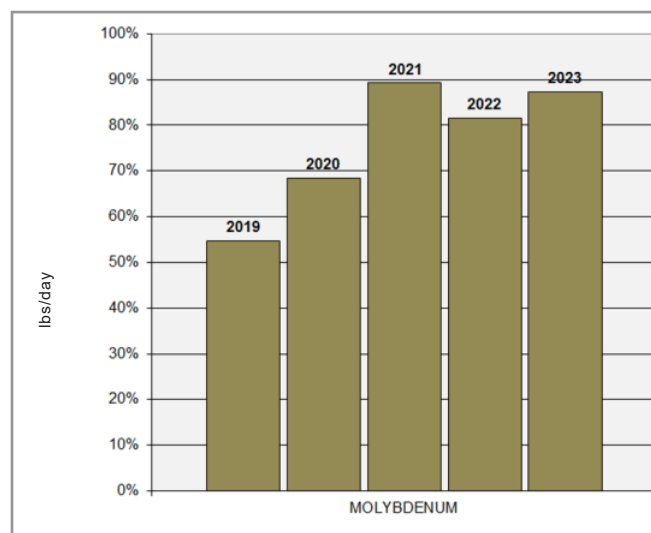
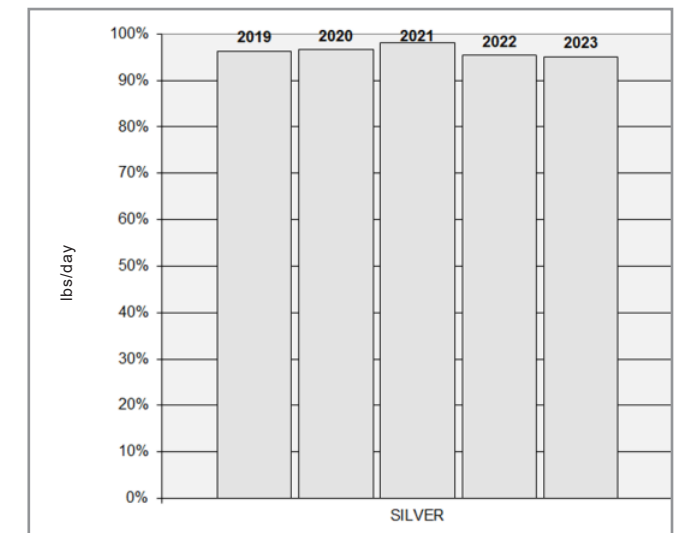
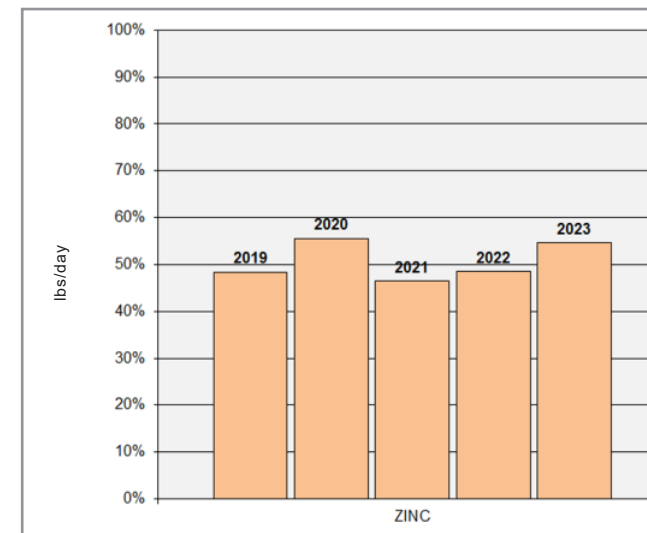
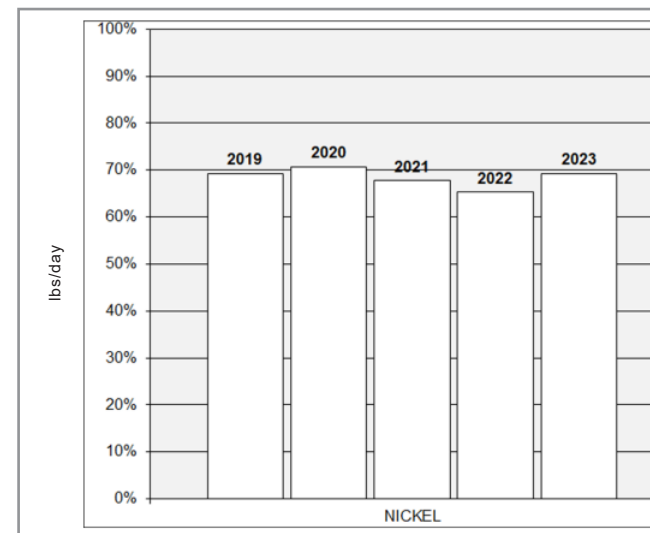
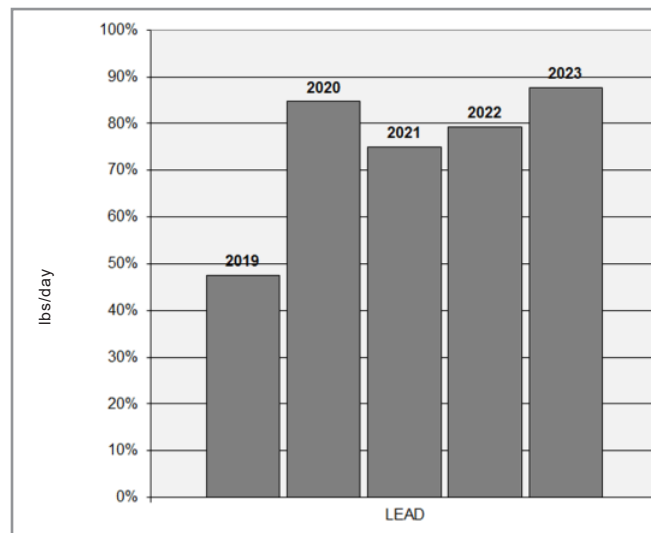
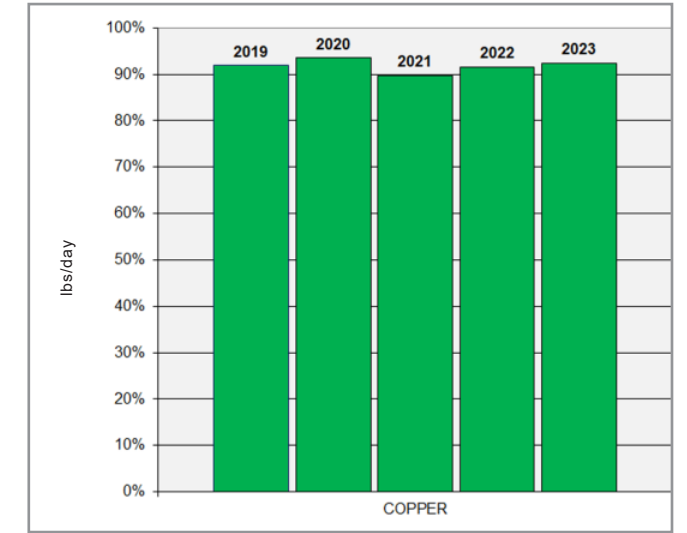
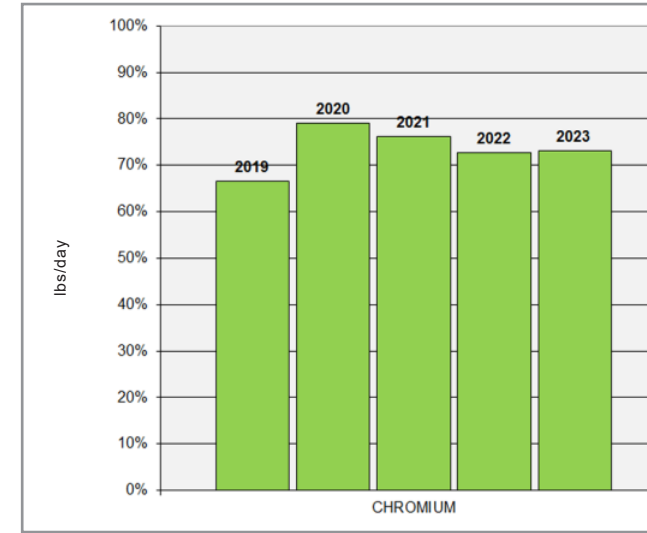
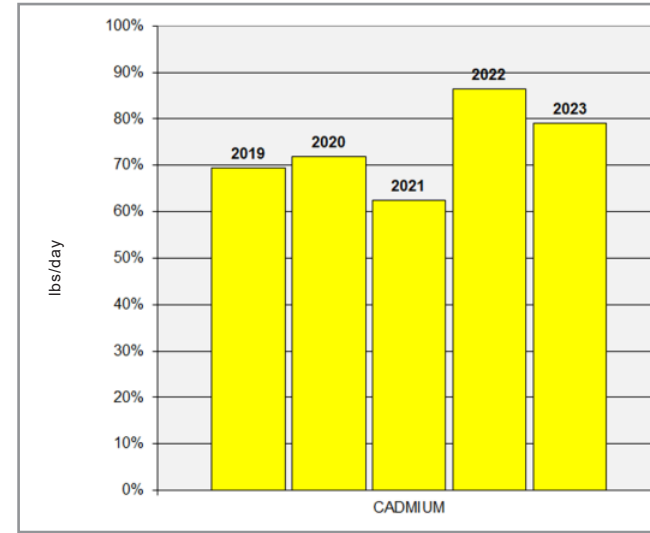
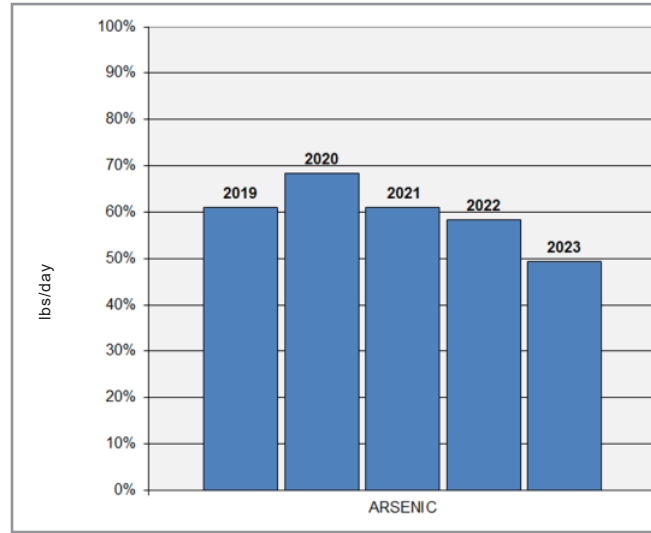
# MARTIN WAY RECLAIMED WATER PLANT INFLUENT METALS LOADING TRENDS 2019-2023



# MARTIN WAY RECLAIMED WATER PLANT FINAL EFFLUENT METALS LOADING TRENDS 2019-2023



# MARTIN WAY RECLAIMED WATER PLANT REMOVAL EFFICIENCY TRENDS 2019-2023









**BIOSOLIDS PRIORITY POLLUTANTS ANALYSES SUMMARY**  
**2023**  
**40 CFR Part 122 Table III Metals/Cyanide/Phenol Priority Pollutants & Molybdenum**

MONTH	Units	ANTIMONY DRY WT.		ARSENIC DRY WT.		BERYLLIUM DRY WT.		CADMIUM DRY WT.		CHROMIUM DRY WT.		COPPER DRY WT.		LEAD DRY WT.		MERCURY DRY WT.		MOLYBDENUM DRY WT.		NICKEL DRY WT.		SELENIUM DRY WT.		SILVER DRY WT.		THALLIUM DRY WT.		ZINC DRY WT.		CYANIDE DRY WT.		PHENOLICS DRY WT.	
		mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day	mg/Kg	lbs/day
JAN	168.77																																
FEB	117.97	4.75	0.046	4.6	0.045	0.099	0.0010	1.09	0.011	17.3	0.168	411	3.99	14.0	0.136	0.381	0.004	10.1	0.098	14.9	0.145	6.6	0.064	2.72	0.026	0.075 J	0.0007 J	797	7.75	2.82	0.027	1.67	0.016
MAR	143.93																																
APR	120.70	2.76	0.024	3.8	0.033	0.095	0.0008	1.13	0.010	17.0	0.147	438	3.80	13.3	0.115	0.832	0.007	9.58	0.083	15.6	0.135	7.3	0.063	3.18	0.028	0.078	0.0007	781	6.78	2.00	0.017	2.86	0.025
MAY	148.89																																
JUN	130.13	2.23	0.020	3.8	0.035	0.095	0.0009	1.05	0.010	19.0	0.174	440	4.03	12.5	0.114	0.999	0.009	10.6	0.097	17.6	0.161	6.8	0.062	2.93	0.027	0.036 J	0.0003 J	765	7.00	1.65	0.015	4.26	0.039
JUL	130.13																																
AUG	123.22	1.51	0.012	2.8	0.023	0.048 J	0.0004	0.62	0.005	11.3	0.092	284	2.32	7.8	0.064	0.425	0.003	6.69	0.055	12.2	0.100	4.5	0.037	1.74	0.014	0.033 J	0.0003 J	459	3.75	0.94	0.008	0.74	0.006
SEP	155.09																																
OCT	149.48	2.60	0.026	5.1	0.051	0.09 J	0.0009	0.882	0.009	17.6	0.176	454	4.53	13.6	0.136	0.545	0.005	10.9	0.109	17.3	0.173	6.8	0.068	2.46	0.025	0.057 J	0.0006 J	761	7.60	1.49	0.015	1.88	0.018
NOV	137.25																																
DEC	148.97	2.23	0.021	4.7	0.044	0.08 J	0.0008	0.90	0.008	18.6	0.175	425	3.99	17.0	0.160	0.479	0.004	11.2	0.105	18.7	0.175	6.3	0.059	2.63	0.025	0.06 J	0.0006 J	690	6.48	1.27	0.012	0.9 J	0.008 J
	MIN	1.51	0.012	2.8	0.023	0.048 J	0.0004	0.62	0.005	11.3	0.092	284	2.32	7.8	0.064	0.381	0.003	6.69	0.055	12.2	0.100	4.5	0.037	1.74	0.014	0.033 J	0.0003 J	459	3.75	0.94	0.008	0.74	0.006
	MAX	4.75	0.046	5.1	0.051	0.099	0.0010	1.13	0.011	19.0	0.176	454	4.53	17.0	0.160	0.999	0.009	11.2	0.109	18.7	0.175	7.3	0.068	3.18	0.028	0.078	0.0007 J	797	7.75	2.82	0.027	4.26	0.039
	AVG	2.68	0.025	4.1	0.038	0.085 J	0.0008	0.95	0.009	16.8	0.155	409	3.78	13.0	0.121	0.610	0.006	9.85	0.091	16.1	0.148	6.4	0.059	2.61	0.024	0.057	0.0005 J	709	6.56	1.70	0.016	2.05	0.019 J
<b>Biosolids Limits</b>	<b>Table 1*</b>			<b>75</b>				<b>85</b>				<b>4,300</b>		<b>840</b>		<b>57</b>		<b>75</b>		<b>420</b>		<b>100</b>						<b>7,500</b>					
	<b>Table 3*</b>			<b>41</b>				<b>39</b>						<b>300</b>		<b>17</b>																	

Analyses performed by ALS Environmental, Kelso, WA  
† – These compounds are unstable under normal conditions. As per EPA Method 624 guideline, the reported values are estimates.  
B – The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.  
D – The reported result is from a dilution.  
J – The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.  
N – The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.  
P – The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).  
U – The compound was analyzed for, but not detected ("Non-detect") at or above the MRL/MDL.  
i – The MRL/MDL has been elevated due to a matrix interference.  
DL – Detection level.  
QL – Quantitation Level.  
RDL – Regulatory Detection Level.  
RQL – Regulatory Quantitation Level.  
\* 40 CFR § 503.13 Biosolids Ceiling Limit and Monthly Average Limit.



BUDD INLET TREATMENT PLANT
PRIMARY INFLUENT
2023
TABLE II, 40 CFR Part 122, ORGANICS, PRIORITY POLLUTANTS

Table with 25 columns: ANALYTE, CAS #, DL, QL, RDL-RQL, µg/L, ANALYTE, CAS #, DL, QL, RDL-RQL, µg/L, ANALYTE, CAS, DL, QL, RDL-RQL, µg/L, ANALYTE, CAS, DL, QL, RDL-RQL, ng/L. Rows include Volatile Organic Compounds, Semi-volatile Organic Compounds, and Organochlorine Pesticides.

Analyses performed by ALS Environmental, Kelso, WA.
† - These compounds are unstable under normal conditions. As per EPA Method 624 guideline, the reported values are estimates.
B - The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
D - The reported result is from a dilution.
J - The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N - The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P - The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U - The compound was analyzed for, but not detected ("Non-detect") at or above the MRL/MDL.
i - The MRL/MDL has been elevated due to a matrix interference.









### LOCAL LIMIT EVALUATION

Total (ATF): 11.77 MGD				Domestic (ADF): 7.05 MGD				Comm/Industrial (AIF): 2.43 MGD				I&I (AIIF) <sup>4</sup> : 2.29 MGD			
PARAMETER	LOCAL LIMIT	INFLUENT LIMIT (lbs/day)		Average Concentrations (mg/l)				LL Calc <sup>5</sup>	Calculated Data						
	(mg/l)	CALC.	ACTUAL	Influent <sup>1</sup>	Domestic <sup>2</sup>	I & I <sup>3</sup>	MAHL (lbs)	CHL	CDL	CIL	MIL	%LL	RC	MAHL	%RC
				(C)	(D)	(E)	(F)	(G) <sup>6</sup>	(H) <sup>6</sup>	(I)	(J)	(K)	(L)	(M)	(N)
Arsenic	0.2	19.63	0.17	0.00175	0.000970	0.00183	36.7	0.17	0.057	0.080	4.71	1.69	36.52	36.64	99.69
Cadmium	0.2	19.63	0.013	0.00014	0.000159	0.00022	36.7	0.013	0.009	-0.0002	4.71	-0.004	36.68	36.69	99.99
Chromium	1.0	98.17	0.14	0.00144	0.00127	0.00159	183	0.14	0.075	0.037	23.56	0.16	183.34	183.41	99.96
Copper	0.5	49.08	5.00	0.05098	0.0861	0.07193	91.7	5.00	5.06	-1.43	11.78	-12.17	86.74	86.68	100.07
Lead	0.4	39.27	0.14	0.00147	0.00107	0.00189	73.4	0.14	0.063	0.045	9.42	0.48	73.25	73.33	99.89
Mercury	0.05	4.91	0.0046	0.00005	0.000026	0.00020	9.17	0.0046	0.0015	-0.0007	1.18	-0.06	9.17	9.17	99.97
Nickel	0.5	49.08	0.30	0.00301	0.00191	0.00280	91.7	0.30	0.11	0.130	11.78	1.10	91.44	91.63	99.80
Silver	0.2	19.63	0.029	0.00029	0.000131	0.00066	36.7	0.029	0.0077	0.008	4.71	0.18	36.67	36.69	99.94
Zinc	1.0	98.17	12.42	0.12657	0.127	0.16241	183	12.4	7.45	1.88	23.56	7.96	171.06	176.03	97.17

<sup>1</sup> Influent metals are sampled and analyzed monthly.

<sup>2</sup> Domestic concentrations from 2011 sampling results.

<sup>3</sup> When lowest loading occurred during low-flow months (June-October), (AVERAGE LOADING - LOWEST LOADING) / AVERAGE INFLOW & INFILTRATION FLOW / 8.34; otherwise, zero.

<sup>4</sup> AIIF – Average Inflow & Infiltration Flow 2.29 MGD TOTAL ANNUAL FLOW – (LOWEST AVERAGE DAILY FLOW X 365) / 365

<sup>5</sup> Based on 22.00 MGD

<sup>6</sup> ATF – Average total flow 11.77 MGD

## INDUSTRIAL SURVEY

The following tables are LOTT's current industrial survey.

INDUSTRIAL USER SURVEY SIGNIFICANT INDUSTRIAL USERS						
Name of Industrial User	Permit Number	Federal Category (40 CFR Part)	SIC Code	Inspected? (Y/N)	Permitted? (Y/N)	Comments
A&R Aviation	TU-014	433	4581	Y	Y	Metal finishing.
Crown Cork & Seal Co. Inc.	OL-002	465 Subpart D	3411	Y	Y	Coil coating.
Georgia-Pacific Corrugated LLC	OL-001	Not categorical	2653	Y	Y	POTW-designated SIU.
International Paper Company	LA-003	Not categorical	2653	Y	Y	POTW-designated SIU.
Pepsi Northwest Beverages, LLC	TU-006	Not categorical	2086	Y	Y	Process wastewater flows over 25,000 gpd.
Thurston County Waste and Recovery Center	LA-004	Not categorical	4953	Y	Y	Process wastewater flows over 25,000 gpd.

INDUSTRIAL USER SURVEY NON-SIGNIFICANT CATEGORICAL INDUSTRIAL USERS						
Name of Industrial User	Permit Number	Federal Category (40 CFR Part)	SIC Code	Inspected? (Y/N)	Permitted? (Y/N)	Comments
American Benchmark Machine Works	TU-0013	433	3841	Y	Y	Zero discharge metal finishing.
Earth Friendly Products	LA-015	417 Subpart P	2841	Y	Y	Zero discharge detergent manufacturing.
J. R. Setina Mfg. Co., Inc.	OL-007	433	3499	Y	Y	Zero discharge metal finishing.

<b>INDUSTRIAL USER SURVEY NON-SIGNIFICANT CATEGORICAL INDUSTRIAL USERS</b>						
<b>Name of Industrial User</b>	<b>Permit Number</b>	<b>Federal Category (40 CFR Part)</b>	<b>SIC Code</b>	<b>Inspected? (Y/N)</b>	<b>Permitted? (Y/N)</b>	<b>Comments</b>
Winsor Fireform, LLC	OL-009	466 Subpart A	3993	Y	Y	Zero discharge porcelain enameling.

<b>INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS</b>					
<b>Name of Industry</b>	<b>Permit Number</b>	<b>SIC Code</b>	<b>Inspected Y/N</b>	<b>Permitted Y/N</b>	<b>Comments</b>
Alaffia		2841	Y	N	Soap manufacturer. Inspected in 2015 and 2016.
Amcors Rigid Plastics		3085	Y	N	Manufacturer of polyethylene terephthalate (PET) packaging. Inspected in 2011, and 2018.
Artizen Cannabis Company			Y	N	Cannabis producer/processor. Inspected in 2022.
Capital Machine			Y	N	Machine shop, and metal fabricator. Inspected in 2019.
Capital Medical Center		806202	Y	N	Hospital. Inspected in 2019.
Cardinal CG Company		3231	Y	N	Manufacturer of coated glass panels. Inspected in 2010, and 2019.
Carman Manufacturing		2515	N	N	Mattress manufacturer. Inspected in 2010.
C.T. Specialties		3603	Y	N	Powder coater. No core metal finishing processes are performed onsite. Inspected in 2021. Reclassified from SIU to MIU on October 28, 2021.
D G Parrott & Son		359903	Y	N	Machine shop, and metal fabricator. Inspected in 2019.
Dart Warehouse			Y	N	Distribution warehouse. Inspected in 2022.
Dart Container Corporation		3086	Y	N	Manufacturer of single-use poly-styrene foam beverage cups & bowls. Inspected in 2018.
Empire Packing		5147	Y	N	Meat packaging plant. Inspected in 2022.



<b>INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS</b>					
<b>Name of Industry</b>	<b>Permit Number</b>	<b>SIC Code</b>	<b>Inspected Y/N</b>	<b>Permitted Y/N</b>	<b>Comments</b>
Flair Packaging			Y	N	Plastic container manufacturer. Inspected in 2022.
Forever Powder Coating			Y	N	Powder coater. No core metal finishing is performed onsite. Inspected in 2018.
Four Star Accessory Overhaul		3724	Y	N	Aircraft engine repair shop. Inspected in 2012, and 2019.
Girard Wood Products			Y	N	Wood pallet recycler. Inspected in 2022.
Harmony Farms			Y	N	Cannabis producer/processor. Inspected in 2021.
H2O Jet, Inc.			Y	N	Pump distributor. Inspected in 2019.
Hauled Wastewater			N/A	Y	Two permitted STEP system haulers; three permitted portable toilet waste haulers, two permitted carpet cleaners, two greywater dischargers, and twenty five authorized mobile food units.
Hella Loud			Y	N	Cannabis producer/processor. Inspected in 2022.
Home Depot by DHL			Y	N	Distribution warehouse. Inspected in 2022.
Home Depot #5650 Distribution Center			Y	N	Distribution warehouse. Inspected in 2022.
Hummingbird Precision Machine Co.			Y	N	Machine shop, and metal fabricator. Inspected in 2022.
Ilk Beer			Y	N	Microbrewery - Inspected in 2023.
I.P. Callison & Sons IPC		2899	Y	N	Mint oils, flavors, & mint-related ingredients supplier. Inspected in 2010.
Intercity Transit			Y	N	Bus fleet maintenance and washing. Inspected in 2019, and 2023.
Kaiser Permanente Olympia Medical Center		806201	Y	N	Medical center. Inspected in 2019.

INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS					
Name of Industry	Permit Number	SIC Code	Inspected Y/N	Permitted Y/N	Comments
Kloeckner Metals Corp			Y	N	Metal milling, and laser cutting. Inspected in 2019
Magic Kombucha			Y	N	Kombucha manufacturer. Inspected in 2023.
Mission Glass LLC		523110	Y	N	Window assembly. Inspected in 2019
Mutual Materials Co			Y	N	Concrete paver manufacturer. Inspected in 2019.
NW Welding and Fabrication			Y	N	Welding and metal fabricator. Inspected in 2019.
Port of Olympia	MIU-OL-003	4491	Y	Y	Vehicle wash racks, stormwater treatment facility, decant facility. Renewed discharge permit in 2022.
Powerclean			N	N	Restaurant fume hood cleaning company.
PR Systems Inc.		1611	Y	N	Asphalt recycling company. Inspected in 2017.
Providence St. Peter's Hospital		8062	N	N	Hospital. Inspected in 2019.
Roy's Designs, Inc.		3499	Y	N	Powder coater. No core metal finishing processes are performed onsite. Inspected in 2023. Reclassified from NSCIU to MIU on October 24, 2023.
Signarama			N	N	Sign manufacturing company.
Sherwood Forest Farms			Y	N	Christmas wreath manufacturer. Inspected in 2022.
Shoebox Spirits		2085	N	N	Distillery.
South Puget Sound Community College			Y	N	Food service, and dental school. Inspected in 2022.
Target Warehouse		1541	Y	N	Distribution warehouse, battery wash, and wash pad. Inspected in 2016, and 2019.
The Evergreen State Community College		8221	Y	N	State college campus. Inspected in 2016, and 2019.

<b>INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS</b>					
<b>Name of Industry</b>	<b>Permit Number</b>	<b>SIC Code</b>	<b>Inspected Y/N</b>	<b>Permitted Y/N</b>	<b>Comments</b>
Three Magnets Brewery		2083	N	N	Microbrewery and restaurant - surveyed in 2014.
Top Rung Brewery		2083	Y	N	Microbrewery - Inspected in 2015.
Tops Solid Surface			Y	N	Stone countertop manufacturer. Inspected in 2021, and 2022.
Tri-City Meats			Y	N	Meat packaging plant. Inspected in 2022.
Valvoline Instant Oil Change			Y	N	Automobile oil change facility. Inspected in 2022.
Washington State Department of Transportation			Y	N	Vehicle maintenance facility. Inspected in 2021.
Whole Foods Distribution Center	LA-016		Y	Y	Warehouse distribution center for Whole Foods. Inspected in 2022. Issued discharge permit for spill prevention in 2023.
World Class Distribution Products			Y	N	Warehouse distribution center for Trader Joe's. Inspected in 2018.
Zeigler's Welding Inc.		508522	Y	N	Welding and metal fabricator. Inspected in 2019.

<b>INDUSTRIAL USER SURVEY OTHER COMMERCIAL USERS</b>		
<b>Commercial User Type</b>	<b>Number</b>	<b>Comments</b>
Brewed/fermented beverage production	17	Includes breweries, cideries, distilleries, and kombucha production.
Cannabis	22	
Cleaning services	32	Includes carpet cleaning companies, and custodial services.
Dental	121	Includes dental offices subject to dental amalgam rule, exempt facilities, and dental laboratories.
Food Service	762	Includes restaurants, grocery stores, hotels, schools, convalescent homes, and houses of worship.

<b>INDUSTRIAL USER SURVEY OTHER COMMERCIAL USERS</b>		
<b>Commercial User Type</b>	<b>Number</b>	<b>Comments</b>
Metal fabrication	33	Includes metal fabricators, powder coaters, and jewelers.
Laundry	23	Includes dry cleaners, and coin operated laundries.
Manufacturing	40	Includes paper, glass, food, beverage, soap, detergent, plastic, and stone countertops.
Medical	409	Includes; chiropractic, convalescent homes, dialysis centers, funeral services, general practitioners, hospitals, imaging/radiology centers, laboratories, massage therapists, pharmacies, physical therapists, phycologists, surgical centers, and veterinarians.
Pool	86	Includes pools at residential apartments and recreational centers.
Printing	43	Includes; screen printers, photo processing centers, and printing facilities.
Transportation	209	Includes; automotive service centers, fleet maintenance facilities, auto body repair, vehicle washing, and gas stations.
Warehouses	14	Includes retail, and industrial warehouses.

Each industry sector is first given an industrial user survey form to discover possible waste streams that may affect the POTW. LOTT uses the generic survey form created by the Department of Ecology to survey potential categorical and significant industrial users.

To survey minor industrial users, the generic survey form is revised to include industry specific questions. In order to know what questions to ask, EPA guidance documents are reviewed, and excerpts from other municipality's forms are used. We also use online communication with pretreatment professionals from around the country to get industry specific questions.

Information gained from the surveys is shared with our Partners and used to enhance our database. Industries that are found to have the potential to discharge harmful or dangerous wastes will receive BMPs and/or an inspection.

BMPs developed by the Department of Ecology and other municipalities are used as templates for LOTT's BMPs. If applicable, the information from surveys and inspections is used to tailor the BMP to the industry. BMPs used by LOTT are provided to businesses during inspections.

## SIU COMPLIANCE SUMMARY

Permitted Industrial User	Permit		Monitoring Frequency <sup>1</sup>	In Significant Non-Compliance? (Y/N) <sup>3</sup>	Compliance <sup>2</sup>					Comments
	Effective	Expires			1	2	3	4	5	
1. A&R Aviation	12/20/20	12/20/25	P- 1/Year S- Variable	F - 0 L - 0 P - 0 S - 0						
2. Crown Cork & Seal Company, Inc.	03/05/21	03/05/25	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 3					N	See details in enforcement section of report summary.
3. Georgia-Pacific Corrugated, LLC	09/14/22	09/13/27	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 0						
4. International Paper Company	09/28/22	09/28/27	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 3 (4)	N	N			N	See details in enforcement section of report summary.
5. Pepsi Northwest Beverages, LLC	09/18/20	09/18/25	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 0						
6. Thurston County Waste & Recovery Center	09/29/22	09/28/27	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 1					N	See details in enforcement section of report summary.

<sup>1</sup> P-POTW compliance monitoring; S-industrial self-monitoring.

<sup>2</sup> F-Categorical standards violation; L-Local limit violation; P- Prohibited discharge standards violation; S-Failed to meet submittal deadline.

<sup>3</sup> 1-Wastewater discharge limits; 2-Compliance schedule milestones; 3-Failure to provide reports; 4-Failure to accurately report non-compliance; 5-Other significant violations.

<sup>4</sup> Maintained zero-discharge status

## NSCIU COMPLIANCE SUMMARY

	Permitted Industrial User	Permit		Monitoring Frequency <sup>1</sup>	In Compliance <sup>2</sup>	Significant Non-compliance (Y/N) <sup>3</sup>					Comments
		Effective	Expires			1	2	3	4	5	
1.	American Benchmark Machine Works	10/15/20	10/14/25	P- S-	<sup>4</sup> <sup>4</sup> F - 0 L - 0 P - 0 S - 0						
2.	Earth Friendly Products	12/07/20	12/07/25	P- S-	<sup>4</sup> <sup>4</sup> F - 1 L - 0 P - 0 S - 0				N		See details in enforcement section of report summary.
3.	J. R. Setina Manufacturing Company, Inc.	09/29/22	09/28/27	P- S-	<sup>4</sup> <sup>4</sup> F - 0 L - 0 P - 0 S - 0						
3.	Roy's Designs, Inc.	12/15/19	12/14/24	P- S-	<sup>4</sup> <sup>4</sup> F - 0 L - 0 P - 0 S - 0						
3.	Winsor Fireform, LLC	12/01/18	11/30/23	P- S-	<sup>4</sup> <sup>4</sup> F - 0 L - 0 P - 0 S - 0						

<sup>1</sup> P-POTW compliance monitoring; S-industrial self-monitoring.

<sup>2</sup> F-Categorical standards violation; L-Local limit violation; P- Prohibited discharge standards violation; S-Failed to meet submittal deadline.

<sup>3</sup> 1-Wastewater discharge limits; 2-Compliance schedule milestones; 3-Failure to provide reports; 4-Failure to accurately report non-compliance; 5-Other significant violations.

<sup>4</sup> Maintained zero-discharge status

**GEORGIA-PACIFIC CORRUGATED, LLC**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN		6-MONTH SNC REVIEW	JUL	AUG	SEP	6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/6/23	3/13/23	4/11/23		5/10/23	6/13/23	7/11/23	6/27/23		8/10/23	9/11/23	10/6/23		11/7/23	12/11/23	1/11/24	
Parameter	Units	Local Limit				10/22-3/23				<b>LOTT</b>	1/23-6/23				4/23-9/23				7/23-12/23
Flow (max)	gpd	<b>16,000</b>	10,164	5,082	5,082	NO	5,082	5,082	5,082	-	NO	5,082	5,082	5,082	NO	10,164	5,082	5,082	NO
Flow (ave)	gpd	<b>11,000</b>	2,951	2,541	3,279	NO	2,372	2,951	3,896	-	NO	3,443	3,443	3,049	NO	3,607	3,388	3,115	NO
BOD (ave)	mg/L	<b>N/A</b>	900	297	268	NO	593	540	290	<b>515</b>	NO	670	297	270	NO	887	333	557	NO
TSS (ave)	mg/L	<b>N/A</b>	40	31	30	NO	18	18	47	<b>58</b>	NO	28	29	27	NO	60	47	79	NO
pH (min)	SU	<b>5.0</b>	5.76	5.72	5.82	NO	6.68	6.06	6.16	<b>7.49</b>	NO	6.84	6.25	6.27	NO	6.12	6.31	6.72	NO
pH (max)	SU	<b>11.0</b>	9.32	8.99	9.69	NO	7.99	8.21	8.20	<b>7.49</b>	NO	7.49	7.70	7.65	NO	7.60	7.84	7.71	NO
FOG-T (HEM)	mg/L	<b>N/A</b>	4.7 U	4.8 U	4.8 U	NO	4.4 U	4.8 U	4.8 U	<b>3.2 J</b>	NO	4.8	4.8 U	4.8 U	NO	4.7 U	10	9.2	NO
FOG-Polar	mg/L	<b>300</b>	0.0 J	0.0 J	0.0 J	NO	0.0 J	0.0 J	0.0 J	<b>1.5 U</b>	NO	0.0 J	0.0 J	0.0 J	NO	0.0 J	5.2 J	4.5 J	NO
FOG-NP (SGT)	mg/L	<b>100</b>	4.7 U	4.8 U	4.8 U	NO	4.4 U	4.8 U	4.8 U	<b>1.7 J</b>	NO	4.8 U	4.8 U	4.8 U	NO	4.7 U	4.8 U	4.7 U	NO
Ammonia	mg/L	<b>N/A</b>	135	113	117	NO	86	94	95	<b>76.5</b>	NO	100	122	113	NO	132	189	106	NO
Arsenic	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	NT	0.003 U	<b>0.00283</b>	NO	NT	NT	NT	NO	NT	0.0019	NT	NO
Cadmium	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	NT	0.00040 U	<b>0.000107</b>	NO	NT	NT	NT	NO	NT	0.0004 U	NT	NO
Chromium	mg/L	<b>1.0</b>	NT	NT	NT	NO	NT	NT	0.00080 U	<b>0.00037</b>	NO	NT	NT	NT	NO	NT	0.0008 U	NT	NO
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	<b>NT</b>	NO	NT	NT	NT	NO	NT	NT	NT	NO
Copper	mg/L	<b>0.5</b>	NT	NT	NT	NO	NT	NT	0.26	<b>0.016</b>	NO	NT	NT	NT	NO	NT	0.036	NT	NO
Lead	mg/L	<b>0.4</b>	NT	NT	NT	NO	NT	NT	0.001 U	<b>0.000536</b>	NO	NT	NT	NT	NO	NT	0.0004 U	NT	NO
Mercury	mg/L	<b>0.05</b>	NT	NT	NT	NO	NT	NT	0.0003 U	<b>0.000001</b>	NO	NT	NT	NT	NO	NT	0.0003 U	NT	NO
Molybdenum	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	1.3	<b>1.59</b>	NO	NT	NT	NT	NO	NT	1.1	NT	NO
Nickel	mg/L	<b>0.5</b>	NT	NT	NT	NO	NT	NT	0.028 U	<b>0.0307</b>	NO	NT	NT	NT	NO	NT	0.015	NT	NO
Selenium	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	0.0080 U	<b>0.0002 U</b>	NO	NT	NT	NT	NO	NT	0.0080 U	NT	NO
Silver	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	NT	0.00040 U	<b>0.000009 U</b>	NO	NT	NT	NT	NO	NT	0.0004 U	NT	NO
Zinc	mg/L	<b>1.0</b>	NT	NT	NT	NO	NT	NT	0.014 U	<b>0.0134</b>	NO	NT	NT	NT	NO	NT	0.019	NT	NO
CN, total	mg/L	<b>0.64</b>	NT	NT	NT	NO	NT	NT	0.020 U	<b>0.016 J</b>	NO	NT	NT	NT	NO	NT	0.033	NT	NO
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

**CROWN CORK & SEAL COMPANY, INC. CATEGORICAL LIMITS**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP		6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/15/23	3/15/23	4/14/23		5/15/23	6/15/23	7/13/23		8/15/23	9/15/23	10/13/23	9/7/23		11/10/23	12/15/23	1/15/24	
Parameter	Units	40 CFR Part 465, Subpart D				10/22-3/23				1/23-6/23				<b>LOTT</b>	4/23-9/23				7/23-12/23
Chromium (max)	gm/mmcans	<b>36.92</b>	0.11	0.12	0.07	NO	0.04	0.06	0.07	NO	0.08	0.05	0.06		NO	0.08	0.06	0.06	NO
Chromium (monthly ave)	gm/mmcans	<b>15.10</b>	0.11	0.12	0.07	NO	0.04	0.06	0.07	NO	0.08	0.05	0.06		NO	0.08	0.06	0.06	NO
Copper (max)	gm/mmcans	<b>159.41</b>	0.94	0.80	0.63	NO	0.55	0.58	0.68	NO	0.86	0.82	0.97		NO	0.73	0.63	0.71	NO
Copper (monthly average)	gm/mmcans	<b>83.90</b>	0.94	0.80	0.63	NO	0.55	0.58	0.68	NO	0.86	0.82	1.01		NO	0.73	0.63	0.71	NO
Zinc (max)	gm/mmcans	<b>122.49</b>	1.06	0.92	0.75	NO	0.85	1.20	1.32	NO	0.80	1.08	1.39		NO	0.70	0.43	0.68	NO
Zinc (monthly average)	gm/mmcans	<b>51.18</b>	1.06	0.92	0.75	NO	0.85	1.20	1.32	NO	0.80	1.08	1.17		NO	0.70	0.43	0.68	NO
Fluoride (max)	gm/mmcans	<b>4,992.05</b>	754	876	417	NO	661.46	646.90	382.58	NO	955.87	671.71	389		NO	698.19	266.70	550	NO
Fluoride (monthly ave)	gm/mmcans	<b>2,214.96</b>	754	876	417	NO	661.46	646.90	382.58	NO	955.87	671.71	699		NO	698.19	266.70	550	NO
Phosphorus (max)	gm/mmcans	<b>1,401.13</b>	3.62	4.38	2.08	NO	1.84	4.53	4.12	NO	2.13	2.92	3.24		NO	1.52	2.43	3.88	NO
Phosphorus (monthly ave)	gm/mmcans	<b>573.04</b>	3.62	4.38	2.08	NO	1.84	4.53	4.12	NO	2.13	2.92	2.89		NO	1.52	2.43	3.88	NO
Manganese (max)	gm/mmcans	<b>57.05</b>	9.65	7.16	2.42	NO	2.54	4.53	7.36	NO	5.74	6.43	3.24		NO	3.95	7.33	4.53	NO
Manganese (monthly ave)	gm/mmcans	<b>24.33</b>	9.65	7.16	2.42	NO	2.54	4.53	7.36	NO	5.74	6.43	3.39		NO	3.95	7.33	4.53	NO
Oil & Grease (max)*	gm/mmcans	<b>1,678.00</b>	114.62	123.38	79.20	NO	99.22	48.52	94.17	NO	101.96	110.98	113		NO	57.68	156.68	42.06	NO
Oil & Grease (monthly ave)*	gm/mmcans	<b>1,006.80</b>	45.25	123.38	79.20	NO	99.22	48.52	94.17	NO	101.96	110.98	151		NO	57.68	156.68	42.06	NO
* in lieu of TTO	All results from self-monitoring except bold print, which is POTW monitoring. Red print denotes violation. NT - not tested																		
Flow (max)	gpd	<b>101,000</b>	82,184	81,183	92,497	NO	84,556	85,633	86,186	NO	96,992	76,799	93,277		NO	82,876	78,250	73,570	NO
Flow (monthly ave)	gpd	<b>90,000</b>	54,073	63,862	75,106	NO	61,266	61,154	59,412	NO	61,772	54,302	59,332		NO	56,054	56,766	58,586	NO
pH (min)	SU	<b>5.0</b>	7.08	7.98	8.3	NO	7.10	7.76	7.96	NO	8.07	8.1	8.19		NO	7.94	7.91	7.26	NO
pH (max)	SU	<b>11.0</b>	9.01	9.23	9.32	NO	9.10	9.27	9.41	NO	9.50	8.6	9.13		NO	9.19	8.88	8.86	NO
Chromium (max)	mg/L	<b>0.007</b>	0.0037	0.0030	0.0016	NO	0.0011	0.0019	0.0024	NO	0.00	0.0018	0.0017	<b>0.002</b>	NO	0.0025	0.0017	0.0018	NO
Chromium (monthly ave)	mg/L	<b>0.007</b>	0.0037	0.0030	0.0016	NO	0.0011	0.0019	0.0024	NO	0.00	0.0018	0.0019		NO	0.0025	0.0017	0.0018	NO
Copper (max)	mg/L	<b>0.006</b>	0.031	0.020	0.015	NO	0.015	0.018	0.023	NO	0.03	0.028	0.030	<b>0.0321</b>	NO	0.024	0.019	0.022	NO
Copper (monthly average)	mg/L	<b>0.006</b>	0.031	0.020	0.015	NO	0.015	0.018	0.023	NO	0.03	0.028	0.031		NO	0.024	0.019	0.022	NO
Zinc (max)	mg/L	<b>0.006</b>	0.035	0.023	0.018	NO	0.023	0.037	0.045	NO	0.03	0.037	0.043	<b>0.0292</b>	NO	0.023	0.013	0.021	NO
Zinc (monthly average)	mg/L	<b>0.006</b>	0.035	0.023	0.018	NO	0.023	0.037	0.045	NO	0.03	0.037	0.0361		NO	0.023	0.013	0.021	NO
Fluoride (max)	mg/L	<b>0.2</b>	25	22	10	NO	18	20	13	NO	30.00	23	12	<b>31.1</b>	NO	23	8.00	17	NO
Fluoride (monthly ave)	mg/L	<b>0.2</b>	25	22	10	NO	18	20	13	NO	30.00	23	21.6		NO	23	8.00	17	NO
Phosphorus (max)	mg/L	<b>0.1</b>	0.12	0.11	0.050 U	NO	0.050 U	0.14	0.14	NO	0.07	0.10 U	0.10 U	<b>0.078</b>	NO	0.050 U	0.07 J	0.12 J	NO
Phosphorus (monthly ave)	mg/L	<b>0.1</b>	0.12	0.11	0.050 U	NO	0.050 U	0.14	0.14	NO	0.07	0.10 U	0.089		NO	0.050 U	0.07 J	0.12 J	NO
Manganese (max)	mg/L	<b>0.002</b>	0.32	0.18	0.058 B	NO	0.069	0.14	0.25	NO	0.18	0.22	0.10	<b>0.109</b>	NO	0.13	0.22	0.14	NO
Manganese (monthly ave)	mg/L	<b>0.002</b>	0.32	0.18	0.058 B	NO	0.069	0.14	0.25	NO	0.18	0.22	0.10		NO	0.13	0.22	0.14	NO
Oil & Grease (SGT) (max)*	mg/L	<b>5</b>	3.8 J	3.1 J	1.9 J	NO	2.7 J	1.5 J	3.2 J	NO	3.20	3.8 J	3.5 J	<b>5.8</b>	NO	1.9 J	4.70 U	1.3 J	NO
Oil & Grease (SGT)(monthly ave)*	mg/L	<b>5</b>	1.5 J	3.1 J	1.9 J	NO	2.7 J	1.5 J	3.2 J	NO	3.20	3.8 J	4.7		NO	1.9 J	4.70 U	1.3 J	NO



**CROWN CORK & SEAL COMPANY, INC.**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP		6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/15/23	3/15/23	4/14/23		5/15/23	6/15/23	7/13/23		8/15/23	9/15/23	10/13/23	9/7/23		11/10/23	12/15/23	1/15/24	
Parameter	Units	Local Limit				10/22-3/23				1/23-6/23				<b>LOTT</b>	4/23-9/23				7/23-12/23
Flow (max)	gpd	<b>101,000</b>	82,184	81,183	92,497	NO	84,556	85,633	86,186	NO	96,992	76,799	93,277		NO	82,876	78,250	73,570	NO
Flow monthly (ave)	gpd	<b>90,000</b>	54,073	63,862	75,106	NO	61,266	61,154	59,412	NO	61,772	54,302	59,332		NO	56,054	56,766	58,586	NO
BOD (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	140	NT	NO	NT	NT	NT	<b>226</b>	NO	NT	140	NT	NO
TSS (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	31	NT	NO	NT	NT	NT	<b>81.0</b>	NO	NT	26	NT	NO
pH (min)	SU	<b>5.0</b>	7.08	7.98	8.30	NO	7.10	7.76	7.96	NO	8.07	8.1	8.19	<b>8.87</b>	NO	7.94	7.91	7.26	NO
pH (max)	SU	<b>11.0</b>	9.01	9.23	9.32	NO	9.10	9.27	9.41	NO	9.50	8.6	9.13	<b>8.87</b>	NO	9.19	8.88	8.86	NO
FOG-T (HEM)	mg/L	<b>N/A</b>	3.8 J	6.0	3.1 J	NO	5.1	4.6 J	5.0	NO	5.6	6.4	5.8 J	<b>15.2</b>	NO	3.70 J	4.7 U	4.1 J	NO
FOG-Polar	mg/L	<b>300</b>	2.3 J	2.9 J	1.2 J	NO	2.4 J	3.1 J	1.8 J	NO	2.4 J	2.6 J	2.3 J	<b>9.4 J</b>	NO	1.80 J	0.0 J	2.8 J	NO
FOG-NP (SGT)	mg/L	<b>100</b>	1.5 J	3.1 J	1.9 J	NO	2.7 J	1.5 J	3.2 J	NO	3.2 J	3.8 J	3.5 J	<b>5.8</b>	NO	1.90 J	4.7 U	1.3 J	NO
Ammonia	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	<b>2.34</b>	NO	NT	NT	NT	NO
Arsenic	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	0.00020 J	NT	NO	NT	NT	NT	<b>0.00016 J</b>	NO	NT	0.0013	NT	NO
Cadmium	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	0.000060 J	NT	NO	NT	NT	NT	<b>0.000229</b>	NO	NT	0.000083	NT	NO
Chromium	mg/L	<b>1.0</b>	0.0037	0.0030	0.0016	NO	0.0011	0.0019	0.0024	NO	0.0024	0.0018	0.0017	<b>0.002</b>	NO	0.0025	0.0017	0.0018	NO
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	<b>0.00</b>	NO	NT	NT	NT	NO
Copper	mg/L	<b>0.5</b>	0.031	0.020	0.015	NO	0.015	0.018	0.023	NO	0.027	0.028	0.030	<b>0.0321</b>	NO	0.024	0.019	0.02	NO
Lead	mg/L	<b>0.4</b>	NT	NT	NT	NO	NT	0.0034	NT	NO	NT	NT	NT	<b>0.00484</b>	NO	NT	0.0022	NT	NO
Mercury	mg/L	<b>0.05</b>	NT	NT	NT	NO	NT	0.00030 U	NT	NO	NT	NT	NT	<b>0.00</b>	NO	NT	0.00030	NT	NO
Molybdenum	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	0.017	NT	NO	NT	NT	NT	<b>0.0188</b>	NO	NT	0.014	NT	NO
Nickel	mg/L	<b>0.5</b>	NT	NT	NT	NO	NT	0.040	NT	NO	NT	NT	NT	<b>0.0445</b>	NO	NT	0.063	NT	NO
Selenium	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	0.0021 U	NT	NO	NT	NT	NT	<b>0.0002 U</b>	NO	NT	0.0080 U	NT	NO
Silver	mg/L	<b>0.2</b>	NT	NT	NT	NO	NT	0.000025 U	NT	NO	NT	NT	NT	<b>0.00001 U</b>	NO	NT	0.0004 U	NT	NO
Zinc	mg/L	<b>1.0</b>	0.035	0.023	0.018	NO	0.023	0.037	0.05	NO	0.025	0.037	0.043	<b>0.0292</b>	NO	0.023	0.013	0.021	NO
CN, total	mg/L	<b>0.64</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	<b>0.002 J</b>	NO	0.0080	0.0088 J	0.010 J	NO
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	<b>NT</b>	NO	NT	NT	NT	NO

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

**A & R Aviation**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP		6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/1/23	3/2/23	4/3/23		5/8/23	6/9/23	7/3/23		8/1/23	9/5/23	10/9/23	9/19/23		11/2/23	12/4/23	1/4/24	
Parameter	Units	40 CFR Part 433 Subpart A				10/22-3/23				1/23-6/23				<b>LOTT</b>	4/23-9/23				7/23-12/23
Cadmium Daily Max	mg/L	0.11	0.0123	Zero Discharge	Zero Discharge	NO	0.00427	Zero Discharge	Zero Discharge	NO	Zero Discharge	Zero Discharge	0.00259	<b>0.00350</b>	NO	Zero Discharge	Zero Discharge	Zero Discharge	NO
Cadmium Monthly Average	mg/L	0.07	0.0123			NO	0.00427			NO			0.00305	NO					
Chromium Daily Max	mg/L	2.77	0.0171			NO	0.00729			NO			0.0074	<b>0.0121</b>	NO				
Chromium Monthly Average	mg/L	1.71	0.0171			NO	0.00729			NO			0.0098	NO					
Copper Daily Max	mg/L	3.38	0.140			NO	0.147			NO			0.101	<b>0.120</b>	NO				
Copper Monthly Average	mg/L	2.07	0.140			NO	0.147			NO			0.111	NO					
Lead Daily Max	mg/L	0.69	0.00380			NO	0.00301			NO			0.00562	<b>0.00640</b>	NO				
Lead Monthly Average	mg/L	0.43	0.00380			NO	0.00301			NO			0.00601	NO					
Nickel Daily Max	mg/L	3.98	0.010			NO	0.00669			NO			0.0047	<b>0.0062</b>	NO				
Nickel Monthly Average	mg/L	2.38	0.010			NO	0.00669			NO			0.0054	NO					
Silver Daily Max	mg/L	0.43	0.000093			NO	0.000053			NO			0.0001 U	<b>0.000047</b>	NO				
Silver Monthly Average	mg/L	0.24	0.000093			NO	0.000053			NO			0.00007 U	NO					
Zinc Daily Max	mg/L	2.61	0.287			NO	0.283			NO			0.239	<b>0.303</b>	NO				
Zinc Monthly Average	mg/L	1.48	0.287			NO	0.283			NO			0.271	NO					
CN, Daily Max	mg/L	1.20	0.20 U			NO	0.020 U			NO			0.020 U	<b>0.0005 U</b>	NO				
CN, Monthly Average	mg/L	0.65	0.20 U			NO	0.020 U			NO			0.010 U	NO					
TTO	mg/L	2.13	NT	NO	NT	NO		NO											

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

**A & R Aviation**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP		6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/1/23	3/2/23	4/3/23		5/8/23	6/6/23	7/3/23		8/1/23	9/5/23	10/9/23	9/19/23		11/2/23	12/4/23	1/4/24	
Parameter	Units	Local Limit				10/22-3/23				1/23-6/23				<b>LOTT</b>	4/23-9/23				7/23-12/23
Flow (max)	gpd	N/A	250	Zero Discharge	Zero Discharge	NO	234	Zero Discharge	Zero Discharge	NO	Zero Discharge	Zero Discharge	Zero Discharge	249	NO	Zero Discharge	Zero Discharge	Zero Discharge	NO
Flow (ave)	gpd	N/A	40.3			NO	12			NO				245.6	NO				
pH (min)	SU	5.0	6.21			NO	5.23			NO				5.09	<b>5.87</b>				NO
pH (max)	SU	11.0	7.95			NO	6.71			NO				5.39	<b>5.87</b>				NO
FOG-T (HEM)	mg/L	N/A	96.7			NO	37.1			NO				42.3	<b>64.0</b>				NO
FOG-Polar	mg/L	300	91.5 J			NO	32.2 J			NO				37.2 J	<b>61.0 J</b>				NO
FOG-NP (SGT)	mg/L	100	5.2 U			NO	4.9 U			NO				5.1 U	<b>3.0 J</b>				NO
Arsenic	lbs/day	0.002	0.000002			NO	NT			NO				0.00000600	<b>0.00001186</b>				NO
Cadmium	lbs/day	0.002	0.000026			NO	0.0000083			NO				0.00000538	<b>0.00000727</b>				NO
Chromium	lbs/day	0.008	0.000036			NO	0.0000142			NO				0.00001537	<b>0.00002513</b>				NO
Chromium +6	lbs/day	0.002	NT			NO	NT			NO				NT	NT				NO
Copper	lbs/day	0.004	0.00029			NO	0.0002869			NO				0.00020974	<b>0.00024920</b>				NO
Lead	lbs/day	0.004	0.0000079			NO	0.0000059			NO				0.00001167	<b>0.00001329</b>				NO
Mercury	lbs/day	0.0004	0.00000167			NO	NT			NO				0.00000166 U	<b>0.0000000137</b>				NO
Molybdenum	lbs/day	N/A	0.000073			NO	NT			NO				0.00004984 U	<b>0.00005</b>				NO
Nickel	lbs/day	0.004	0.000021			NO	0.0000131			NO				0.00000976	<b>0.00001283</b>				NO
Selenium	lbs/day	N/A	0.0000030			NO	NT			NO				0.00001682	<b>0.00000540</b>				NO
Silver	lbs/day	0.002	0.00000194			NO	0.0000001			NO				0.00000021 U	<b>0.00000003 U</b>				NO
Zinc	lbs/day	0.008	0.0006			NO	0.0005523			NO				0.00049632	<b>0.00062923</b>				NO
CN, total	lbs/day	0.005	0.000042 U			NO	0.0000390			NO				0.00004153	<b>0.00000104</b>				NO
CN, free	lbs/day	0.002	NT	NO	NT	NO	NT	NT	NO										

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

**INTERNATIONAL PAPER COMPANY**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP	6-MONTH SNC REVIEW	OCT		NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/13/23	3/7/23	4/10/23		5/5/23	6/2/23	7/12/23		8/10/23	9/12/23	10/5/23		11/2/23	10/5/23	12/4/23	1/3/24	
Parameter	Units	Local Limit				10/22-3/23				1/23-6/23				4/23-9/23	<b>LOTT</b>				7/23-12/23
Flow (max)	gpd	<b>15,000</b>	11,744	13,655	9,306	NO	9,531	9,290	10,300	NO	13,606	7787	10,296	NO	83,697		10,399	8615	NO
Flow (ave)	gpd	<b>11,000</b>	3,360	2,828	2,120	NO	2,615	1,687	2,784	NO	2755	2700	2650	NO	2806		2680	2282	NO
BOD (ave)	mg/L	<b>N/A</b>	<b>1110</b>	174	717	NO	1537	693	993	NO	963	1710	817	NO	643	<b>684</b>	733	497	NO
TSS (ave)	mg/L	<b>N/A</b>	37	40	13	NO	105	24	7.0	NO	9.3	19	37	NO	27	<b>NT</b>	15	8.5	NO
pH (min)	SU	<b>5.0</b>	5.3	7.0	7.1	NO	6.5	6.0	6.2	NO	5.90	5.4	6.3	NO	6.0	<b>8.27</b>	6.8	7.0	NO
pH (max)	SU	<b>11.0</b>	8.4	7.7	8.5	NO	9.0	8.6	9.2	NO	9.6	9.6	9.6	NO	9.6	<b>8.27</b>	8.8	9.80	NO
FOG-T (HEM)	mg/L	<b>N/A</b>	5.4	<b>NT</b>	5.5	NO	4.8 U	4.7 U	4.7 U	NO	4.8 U	5.3 U	5.2 U	NO	5.2 U	<b>2.2 J</b>	5.0 U	5.3 U	NO
FOG-Polar	mg/L	<b>300</b>	0.60 J	<b>NT</b>	0.60 J	NO	0.0 J	0.0 J	0.0 J	NO	0.0 J	0.0 J	0.0 J	NO	0.0 J	<b>0.0 J</b>	0.00 J	0.50 J	NO
FOG-NP (SGT)	mg/L	<b>100</b>	4.8 U	<b>NT</b>	4.9 U	NO	4.8 U	4.7 U	4.7 U	NO	4.8 U	5.3 U	5.2 U	NO	5.2 U	<b>5.0 U</b>	5.0 U	4.8 U	NO
Ammonia	mg/L	<b>N/A</b>	21	12.3	44.9	NO	37.9	32.1	14.0	NO	28.1	15.1	15	NO	8.3	<b>15</b>	23.7	35.00	NO
Arsenic	mg/L	<b>0.2</b>	0.00142	NT	NT	NO	NT	NT	NT	NO	NT	0.00243	NT	NO	NT	<b>0.00174</b>	NT	NT	NO
Cadmium	mg/L	<b>0.2</b>	0.000024	NT	NT	NO	NT	NT	NT	NO	NT	0.000032	NT	NO	NT	<b>0.000019</b>	NT	NT	NO
Chromium	mg/L	<b>1.0</b>	0.00039	NT	NT	NO	NT	NT	NT	NO	NT	0.00055	NT	NO	NT	<b>0.00033</b>	NT	NT	NO
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NT	NO
Copper	mg/L	<b>0.5</b>	0.0345	NT	NT	NO	NT	NT	NT	NO	NT	0.0251	NT	NO	NT	<b>0.0438</b>	NT	NT	NO
Lead	mg/L	<b>0.4</b>	0.00179	NT	NT	NO	NT	NT	NT	NO	NT	0.00124	NT	NO	NT	<b>0.00345</b>	NT	NT	NO
Mercury	mg/L	<b>0.05</b>	0.0002 U	NT	NT	NO	NT	NT	NT	NO	NT	0.0002 U	NT	NO	NT	<b>0.0000079</b>	NT	NT	NO
Molybdenum	mg/L	<b>N/A</b>	0.00386	NT	NT	NO	NT	NT	NT	NO	NT	0.0583	NT	NO	NT	<b>0.0188</b>	NT	NT	NO
Nickel	mg/L	<b>0.5</b>	0.00453	NT	NT	NO	NT	NT	NT	NO	NT	0.00403	NT	NO	NT	<b>0.00314</b>	NT	NT	NO
Selenium	mg/L	<b>N/A</b>	0.001 U	NT	NT	NO	NT	NT	NT	NO	NT	0.001 U	NT	NO	NT	<b>0.0002</b>	NT	NT	NO
Silver	mg/L	<b>0.2</b>	0.000031	NT	NT	NO	NT	NT	NT	NO	NT	0.00002 U	NT	NO	NT	<b>0.000023</b>	NT	NT	NO
Zinc	mg/L	<b>1.0</b>	0.0353	NT	NT	NO	NT	NT	NT	NO	NT	0.062	NT	NO	NT	<b>0.019</b>	NT	NT	NO
CN, total	mg/L	<b>0.64</b>	0.020 U	NT	NT	NO	NT	NT	NT	NO	NT	0.020 U	NT	NO	NT	<b>0.02</b>	NT	NT	NO
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NT	NO

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

**THURSTON COUNTY WATER & WASTE MANAGEMENT – WASTE & RECOVERY CENTER**

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN	6-MONTH SNC REVIEW	JUL	AUG	SEP	6-MONTH SNC REVIEW	OCT	NOV	DEC		6-MONTH SNC REVIEW	
Date DMR Received			2/14/23	3/13/23	4/14/23		5/11/23	6/14/23	N/A		N/A	N/A	N/A		11/24/23	12/15/23	1/12/24	1/2/24		
Parameter	Units	Local Limit				10/22-3/23				1/23-6/23				4/23-9/23				LOTT		7/23-12/23
001	Flow (max)	gpd	<b>100,000</b>	45,651	27,202	46,945	NO	19,040	13,174	0	NO	0	0	0	NO	50,800	61,616	65400		NO
	Flow (ave)	gpd	<b>50,000</b>	34,598	23,788	26,011	NO	2,532	1,649	0	NO	0	0	0	NO	19,213	20,522	41973		NO
002	Flow (max)	gpd	<b>100,000</b>	1207	1,182	1,677	NO	1,797	3,885	600	NO	400	300	500	NO	110	135	1100		NO
	Flow (ave)	gpd	<b>50,000</b>	450	379	600	NO	757	392	173	NO	119	113	109	NO	12	28	200		NO
003	Flow (max)	gpd	<b>100,000</b>	46,858	28,384	48,622	NO	20,837	16,647	600	NO	400	300	500	NO	50,800	61,656	65400		NO
	Flow (ave)	gpd	<b>50,000</b>	35,048	24,167	26,611	NO	3,289	2,040	173	NO	119	113	109	NO	19,225	20,549	40813		NO
	BOD (ave)	mg/L	<b>N/A</b>	21	39	31	NO	237	61	NT	NO	NT	NT	NT	NO	36	121	208	48	NO
	TSS (ave)	mg/L	<b>N/A</b>	30	31	32	NO	192	40	NT	NO	NT	NT	NT	NO	107	311	89	49	NO
	pH (min)	SU	<b>5.0</b>	8.03	7.46	7.61	NO	6.73	6.98	NT	NO	NT	NT	NT	NO	7.23	6.73	6.73	7.16	NO
	pH (max)	SU	<b>11.0</b>	8.19	8.16	8.23	NO	7.71	7.63	NT	NO	NT	NT	NT	NO	8.31	7.46	7.45	7.16	NO
	FOG-T (HEM)	mg/L	<b>N/A</b>	5 U	5 U	7.1	NO	5 U	5 U	NT	NO	NT	NT	NT	NO	5 U	5 U	5 U	2.7 J	NO
	FOG-Polar	mg/L	<b>300</b>	5 U	5 U	5 U	NO	5 U	5 U	NT	NO	NT	NT	NT	NO	5 U	5 U	5 U	0.1 J	NO
	FOG-NP (SGT)	mg/L	<b>100</b>	5 U	5 U	5 U	NO	5 U	5 U	NT	NO	NT	NT	NT	NO	5 U	5 U	5 U	2.6 J	NO
	Ammonia	mg/L	<b>N/A</b>	91	62	96	NO	58.7	58.7	NT	NO	NT	NT	NT	NO	0.17	31.1	26	12.46	NO
	Arsenic	mg/L	<b>0.2</b>	0.00683	0.00748	0.00903	NO	0.011	0.016	NT	NO	NT	NT	NT	NO	0.0109	0.00426	0.00466	0.00335	NO
	Cadmium	mg/L	<b>0.2</b>	0.0001 U	0.1 U	0.000100	NO	0.000619	0.00035	NT	NO	NT	NT	NT	NO	0.0001	0.0001 U	0.000324	0.000072	NO
	Chromium	mg/L	<b>1.0</b>	0.00762	0.0084	0.01050	NO	0.0259	0.0186	NT	NO	NT	NT	NT	NO	0.00702	0.00247	0.0101	0.00274	NO
	Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NT	NO
	Copper	mg/L	<b>0.5</b>	0.00820	0.00728	0.0110	NO	0.0777	0.0672	NT	NO	NT	NT	NT	NO	0.0151	0.0216	0.0484	0.0131	NO
	Lead	mg/L	<b>0.4</b>	0.001150	0.00117	0.00219	NO	0.01530	0.00955	NT	NO	NT	NT	NT	NO	0.00231	0.000846	0.00953	0.00233	NO
	Mercury	mg/L	<b>0.05</b>	0.0001 U	0.0001 U	0.0001 U	NO	0.00029	0.0002 U	NT	NO	NT	NT	NT	NO	0.0001 U	<b>NT</b>	0.0001	0.00000918	NO
	Molybdenum	mg/L	<b>N/A</b>	0.00134	0.00087	0.00137	NO	0.00444	0.00536	NT	NO	NT	NT	NT	NO	0.00285	0.00087	0.0036	0.00065	NO
	Nickel	mg/L	<b>0.5</b>	0.01580	0.01650	0.0215	NO	0.02360	0.0218	NT	NO	NT	NT	NT	NO	0.03020	0.00416	0.0162	0.00686	NO
	Selenium	mg/L	<b>N/A</b>	0.0030 U	0.00493	0.00282	NO	0.00236	0.00218	NT	NO	NT	NT	NT	NO	0.007 U	0.001 U	0.00368	0.0002	NO
Silver	mg/L	<b>0.2</b>	0.0002 U	0.0002 U	0.0002 U	NO	0.00036	0.00093	NT	NO	NT	NT	NT	NO	0.0002	0.0002 U	0.00039	0.00000918	NO	
Zinc	mg/L	<b>1.0</b>	0.0363	0.0374	0.056	NO	0.636	0.903	NT	NO	NT	NT	NT	NO	0.0625	0.0678	0.365	0.0424	NO	
CN, total	mg/L	<b>0.64</b>	0.005 U	0.005 U	0.005 U	NO	0.005 U	0.005 U	NT	NO	NT	NT	NT	NO	0.049 U	0.005 U	0.005 U	0.0009 J	NO	
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NT	NO	
TKN	mg/L	<b>N/A</b>	85.7	87.4	88.3	NO	30.0	NT	NT	NO	NT	NT	NT	NO	27.2	20.1	NT	NT	NO	

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

PEPSI NORTHWEST BEVERAGES, LLC

2023			JAN	FEB	MAR	6-MONTH SNC REVIEW	APR	MAY	JUN		6-MONTH SNC REVIEW	JUL	AUG	SEP	6-MONTH SNC REVIEW	OCT	NOV	DEC	6-MONTH SNC REVIEW
Date DMR Received			2/2/23	3/1/23	4/3/23		5/1/23	6/1/23	7/6/23	6/27/23		8/1/23	9/5/23	10/9/23		11/2/23	12/1/23	1/3/23	
Parameter	Units	Local Limit				10/22-3/23			LOTT		1/23-6/23				4/23-9/23				7/23-12/23
Flow (max)	gpd	198,000	155,016	153,236	158,532	NO	155,352	149,392	158,340	-	NO	156,148	175,564	168,180	NO	157,356	163,184	161,920	NO
Flow (ave)	gpd	<b>144,000</b>	111,945	108,874	118,244	NO	104,389	108,002	128,135	-	NO	117,003	133,640	127,096	NO	107125	100,712	105,404	NO
BOD (ave)	mg/L	<b>N/A</b>	1634	3184	2153	NO	2371	1467	1773	1705	NO	1409	1841	1509	NO	1328	1900	2585	NO
TSS (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	-	59.5	NO	-	NT	NT	NO	NT	NT	NT	NO
pH (min)	SU	<b>5.0</b>	5.80	5.80	5.57	NO	5.79	5.79	5.79	7.02	NO	5.79	5.76	5.77	NO	5.79	5.79	5.79	NO
pH (max)	SU	<b>11.0</b>	10.67	10.68	10.75	NO	10.73	9.81	10.33	7.02	NO	10.64	10.49	10.51	NO	9.99	10.00	10.73	NO
FOG-T (HEM)	mg/L	<b>N/A</b>	15	32	34	NO	28.6	18.0	17.9	39.1	NO	38	49	17	NO	10.9	5.1 U	29	NO
FOG-Polar	mg/L	<b>300</b>	4.0	15	10	NO	28.6	6.0	7.9	13.2	NO	10.0	11	7.0	NO	5.0 J	5.1 U	15	NO
FOG-NP (SGT)	mg/L	<b>100</b>	11	17	24	NO	5.3	12.0	10	25.9	NO	28	38	10	NO	5.9	5.1 U	14	NO
Ammonia	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	-	0.07	NO	NT	NT	NT	NO	NT	NT	NT	NO
Arsenic	mg/L	<b>0.2</b>	NT	NT	0.0013	NO	NT	NT	NT	0.00129	NO	NT	NT	0.0012	NO	NT	NT	NT	NO
Cadmium	mg/L	<b>0.2</b>	NT	NT	0.00040 U	NO	NT	NT	NT	0.000015 J	NO	NT	NT	0.00040 U	NO	NT	NT	NT	NO
Chromium	mg/L	<b>1.0</b>	NT	NT	0.0052	NO	NT	NT	NT	0.00257	NO	NT	NT	0.0034	NO	NT	NT	NT	NO
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO
Copper	mg/L	<b>0.5</b>	NT	NT	0.04	NO	NT	NT	NT	0.033	NO	NT	NT	0.018	NO	NT	NT	NT	NO
Lead	mg/L	<b>0.4</b>	NT	NT	0.00082	NO	NT	NT	NT	0.00267	NO	NT	NT	0.0014	NO	NT	NT	NT	NO
Mercury	mg/L	<b>0.05</b>	NT	NT	0.00030 U	NO	NT	NT	NT	0.000060	NO	NT	NT	0.00030	NO	NT	NT	NT	NO
Molybdenum	mg/L	<b>N/A</b>	NT	NT	0.00080 U	NO	NT	NT	NT	0.00040	NO	NT	NT	0.00080 U	NO	NT	NT	NT	NO
Nickel	mg/L	<b>0.5</b>	NT	NT	0.0030 U	NO	NT	NT	NT	0.00170	NO	NT	NT	0.0030 U	NO	NT	NT	NT	NO
Selenium	mg/L	<b>N/A</b>	NT	NT	0.0080 U	NO	NT	NT	NT	0.0002 U	NO	NT	NT	0.0080 U	NO	NT	NT	NT	NO
Silver	mg/L	<b>0.2</b>	NT	NT	0.00040 U	NO	NT	NT	NT	0.000010 J	NO	NT	NT	0.00040 U	NO	NT	NT	NT	NO
Zinc	mg/L	<b>1.0</b>	NT	NT	0.039	NO	NT	NT	NT	0.113	NO	NT	NT	0.039	NO	NT	NT	NT	NO
CN, total	mg/L	<b>0.64</b>	NT	NT	0.020 U	NO	NT	NT	NT	0.020 U	NO	NT	NT	0.020 U	NO	NT	NT	NT	NO
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NO	NT	NT	NT	NT	NO	NT	NT	NT	NO	NT	NT	NT	NO

All results from self-monitoring except **bold** print, which is POTW monitoring. **Red** print denotes violation. NT - not tested

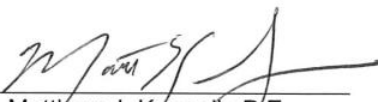
**ZERO DISCHARGE NON SIGNIFICANT CATEGORICAL INDUSTRIAL USERS**

AMERICAN BENCHMARK MACHINE WORKS		EARTH FRIENDLY PRODUCTS		J.R. SETINA MANUFACTURING		ROY'S DESIGNS		WINSOR FIREFORM	
Date of annual facility inspection	Date annual certification received	Date of annual facility inspection	Date annual certification received	Date of annual facility inspection	Date annual certification received	Date of annual facility inspection	Date annual certification received	Date of annual facility inspection	Date annual certification received
10/20/2023	1/30/2023	10/24/2023	1/30/2024	10/18/2023	1/16/2024	10/16/2023	10/16/2023	12/14/2023	1/3/2024

**PERFORMANCE SUMMARY**

<b>I GENERAL INFORMATION</b>	
Control Authority Name:	LOTT Clean Water Alliance
Address:	500 Adams St NE
City:	Olympia
State:	WA
Zip:	98501-1073
Contact Person:	Justin Boyes, Environmental Program Manager
Contact Telephone Number:	(360) 528-5728
NPDES #:	WA0037061
Reporting Period:	January 1, 2023, to December 31, 2023
Total Significant Categorical IUs:	2
Total Significant Non-categorical IUs:	4
<b>II SIGNIFICANT INDUSTRIAL USER COMPLIANCE</b>	
	<b>SIGNIFICANT INDUSTRIAL USERS</b>
	Categorical                      Non-categorical
No. of SIUs submitting BMRs/no. required	0 / 0                      0 / 0
No. of SIUs submitting 90-day compliance reports/no. required	0 / 0                      0 / 0
No. of SIUs submitting semi-annual reports/no. required	2 / 2                      3 / 3
No. of SIUs meeting compliance schedule/no. required to meet schedule	0 / 0                      0 / 0
No. of SIUs in SNC (categorical & non-categorical)	1                                      0
No. of SIUs not inspected or sampled	0                                      0
No. of SIUs in SNC with standards and reporting	1                                      0
No. of SIUs in SNC with self-monitoring	0                                      0
No. of SIUs in SNC with self-monitoring and not inspected or sampled	0                                      0
No. of SIUs in SNC/total number of SIUs	0/2                                      0/4
<b>III COMPLIANCE MONITORING PROGRAM</b>	
No. of SIUs without a permit	0
No. of SIU non-sampling inspections conducted	2
No. of SIU sampling visits conducted	7
No. of SIU facilities sampled	6
Technical basis for limits (Y/N)	Y
Adoption of technically based local limits (Y/N)	Y
<b>IV ENFORCEMENT ACTIONS</b>	
Compliance schedules issued/schedules required	0/0                                      0/0
Notice of violations issued to SIUs	0
Administrative orders issued to SIUs	0
Civil suits filed	0
Significant violators (attach newspaper list)	0
No. of penalties collected (total dollars/IUs assessed)	0
Other SIU actions (letters of violations, sewer bans, warnings, etc.)	6

2/20/2024  
 Date

  
 Matthew J. Kennelly P.E.  
 Executive Director  
 LOTT Clean Water Alliance



# Vehicle and Equipment Wastewater Best Management Practices



# APPENDIX ONE

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## APPENDIX ONE

### 1.1 BACKGROUND

Wastewater from vehicle/equipment cleaning activities may contain significant quantities of oil and grease, suspended solids, heavy metals, and organics, as well as pollutants from detergents. These pollutants can be toxic and harmful to living organisms, including the microbes at LOTT's wastewater treatment plants.

Wastewater can be treated with the use of an oil and water separator. However, oil and water separators must be properly installed, and maintained. Good housekeeping practices and spill prevention help oil and water separators to work more efficiently.

These BMPs detail LOTTs requirements for oil and water separator maintenance, chemical storage, and spill prevention/notification.

### 1.2 LEGAL AUTHORITY

The LOTT Clean Water Alliance and its partner agencies own and operate a Publicly Owned Treatment Works, which could be adversely impacted by discharges from Industrial Users and have implemented a pretreatment program to control these discharges. Responsibility as a control authority for the pretreatment program has been delegated to LOTT from the Washington State Department of Ecology.

As a delegated Control Authority LOTT is responsible for ensuring that Industrial Users comply with Federal, State, and Local regulations to prevent the discharge of pollutants to the POTW. LOTT has enacted discharge regulations, which are adopted in the City of Lacey, City of Olympia, City of Tumwater, and Thurston County municipal codes.

The legal authority to enact LOTT's Vehicle and Equipment Wastewater BMPs is codified in the following sections of the LOTT Discharge and Industrial Pretreatment Regulations. Enforcement is governed by the provisions specified in Section 10 of the LOTT Regulations.

#### **LOTT Discharge and Industrial Pretreatment Regulations § 2.1 Prohibited Discharge Standards B1, B2, B3, B6, B7, B10, B14, B17, and B18.**

B. Specific Prohibitions – No User shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

1. Pollutants, which either alone or by interaction may create a fire or explosive hazard in the POTW, a public nuisance or hazard to life, or prevent entry into the sewers for their maintenance and repair or are in any way injurious to the operation of the system or operating personnel. This includes waste

## APPENDIX ONE

streams with a closed cup flashpoint of less than 140 degrees F (60 degrees C) using the test methods specified in 40 CFR Part 261.21.

2. Wastewater having a pH less than 5.0 or more than 11.0, or otherwise having any other corrosive property capable of causing damage or hazard to structures, equipment, or personnel. Discharges outside this pH range may be authorized by the Executive Director through a permit issued by the [City or County] pursuant to a finding that the system is specifically designed to accommodate a discharge of that pH.
3. Solid or viscous substances in amounts that may cause obstruction to the flow in the sewer or other interference with the operation of the system. In no case shall solids greater than 1/4 inch (0.64 cm) in any dimension be discharged.
6. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference or Pass Through.
7. Pollutants, which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.
10. Noxious or malodorous liquids, gases, solids, or other wastewater, which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair.
14. Sludges, screenings, or other residues from the pretreatment of industrial wastes;
17. Detergents, surface active agents, or other substances, which may cause excessive foaming in the POTW;
18. Fats, oils, or greases of animal or vegetable origin in concentrations greater than three hundred (300) mg/L, or Total Petroleum Hydrocarbon concentrations of no more than one hundred (100) mg/L.

Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such a manner that they could be discharged to the POTW.

### **LOTT Discharge and Industrial Pretreatment Regulations § 2.3 State Pretreatment Standards**

D. All Users shall apply all known, available, and reasonable methods to prevent and control waste discharges to the waters of the State.

## APPENDIX ONE

E. Discharge restrictions of Chapter 173-303 WAC (Dangerous Waste) shall apply to all Users.

### **LOTT Discharge and Industrial Pretreatment Regulations § 2.4 Local Limits**

G. The Executive Director may establish and the [City or County] require Best Management Practices for any category of User or type of industrial process, which creates a non-domestic waste stream. Such requirements may be applied either in lieu of or in addition to the local limits of Section 2.4. BMPs may also include alternative limits, which may be applied at the end of a specific process or treatment step instead of at the combined effluent.

### **LOTT Discharge and Industrial Pretreatment Regulations § 3.1 Pretreatment Facilities**

Users shall provide wastewater treatment as necessary to comply with this Ordinance and shall achieve compliance with all categorical pretreatment standards, local limits, and the prohibitions set out in Section 2.1 of this Ordinance within the time limitations specified by USEPA, the State, the [City or County], or the Executive Director, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the User's expense, and satisfy State requirements for review and approval of Plans for Wastewater Facilities as described in Section 2.3.

### **LOTT Discharge and Industrial Pretreatment Regulations § 3.2 E-F Additional Pretreatment Measures**

- E. The Executive Director and the [City or County], based on the determination that such devices are necessary for implementation of pretreatment requirements, may require any User to install and maintain, on their property and at their expense the following devices:
1. A sample taking facility accessible to the Executive Director
  2. A suitable storage and/or flow equalization tank
  3. Grease, oil, and/or grit interceptors
  4. An approved combustible gas detection meter
- F. Users installing any of the above devices shall ensure they are of the type and capacity approved by the [City or County], meet applicable building and plumbing codes, and conform to any separate requirements established by the [City or County] and the Executive Director. Users shall locate units in areas easily accessible for cleaning and inspection by representatives of the

## APPENDIX ONE

[City or County] or Executive Director. Users shall be responsible for all periodic inspection, cleaning, and repair of such devices.

### **LOTT Discharge and Industrial Pretreatment Regulations § 6.7 Reports from Unpermitted Users**

All Users not required to obtain a wastewater discharge permit or general permit shall provide appropriate reports to the Executive Director as the Executive Director may require. This includes periodically completing and signing Industrial User Surveys.

### **1.3 DEFINITIONS**

Best Management Practices or BMPs – Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.1(A) and (B) and 40 CFR Part 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

“Control Authority” means the LOTT Clean Water Alliance, Executive Director

“Duly Authorized Representative” is defined in Section 1.4(C) of the LOTT Discharge and Industrial Pretreatment Regulations.

“Slug Load or Slug Discharge” – Any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW’s regulations, local limits, or Permit conditions. This includes discharges at a flow rate or concentration that could cause a violation of the prohibited discharge standards of Section 2.1 of this Ordinance.

“Publicly Owned Treatment Works” or POTW – A treatment works, as defined by Section 212 of the Act (33 U.S.C. Section 1292), which is owned by LOTT and/or the [City or County] and more fully described in the “Interlocal Cooperation Act Agreement for Wastewater Management by the LOTT Wastewater Alliance by and among City of Lacey, City of Olympia, City of Tumwater, and Thurston County, dated November 5, 1999.” This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and

## APPENDIX ONE

any conveyances, including sanitary sewer and storm sewer collection systems, which convey wastewater to a treatment plant.

### 1.4 APPLICABILITY

- A. All automotive facilities that discharge or have the potential to discharge wastewater generated from the repair, maintenance, and cleaning of cars, trucks, heavy duty vehicles, and similar equipment to the POTW are required to comply with LOTT's BMPs and meet specific reporting requirements. Applicability includes wastewater discharges from facility cleaning.

### 1.5 EXEMPTIONS

Facilities that have no floor drains connected to the POTW, and only discharge domestic wastewater are exempt from these BMPs.

These BMPs do not apply to discharges to stormwater systems.

### 1.6 SPILL PREVENTION REQUIREMENTS

- A. Materials that would violate the discharge prohibitions of Section Two of the LOTT Discharge and Industrial Pretreatment Regulations cannot be stored in a way they can be accidentally discharged to the POTW. If floor drains are present in areas where these materials are stored, then the floor drains must either be sealed, or secondary containment must be installed to prevent the materials from entering the POTW.

### 1.7 OIL AND WATER SEPARATOR MAINTENANCE REQUIREMENTS

- A. Oil and water separator(s) or similar device(s) must be inspected and pumped out in accordance with the manufacturer's specifications. If the manufacturer does not provide specifications for maintenance, then the separator must be inspected and pumped out as follows:
  - a. When oil levels equal or exceed a depth of three inches.
  - b. When the sediment depth in any chamber of the oil and water separator exceeds fifty percent of the total depth, or when the sediment depth equals or exceeds the bottom level of the outlet pipe whichever is first.
  - c. After a significant spill.
  - d. When free floating product is visible in the effluent

## APPENDIX ONE

- B. Tee and drop legs must be installed on inlets and outlets unless manufacturer's specifications specify otherwise.

### 1.8 RECOMMENDED HOUSE KEEPING PRACTICES

- A. Place oil absorbent materials in the oil and water separator and replace them when they are saturated with oil.
- B. Use oil absorbents to clean spills instead of, or prior to, cleaning with water.
- C. Keep fully stocked spill kits readily available.
- D. Clean spills immediately.
- E. Sweep or vacuum floors instead of, or prior to, cleaning with water.
- F. Install and maintain a dropout box, catch basin, or solids interceptor ahead of the oil and water separator to minimize the amounts of sand, dirt, rags, leaves, gravel, and other solids that enter the separator. These solids can be shoveled out before they reach the separator.

### 1.9 PROHIBITIONS

- A. Contaminated materials, leftover chemicals, dangerous waste, and hazardous wastes cannot be disposed of in the sewer, even if the user has an oil and water separator.

### 1.10 RECORDKEEPING AND REPORTING REQUIREMENTS

- A. Upon request from LOTT automotive facilities must submit appropriate reports including, hazardous waste characterizations, and oil, and water separator cleaning manifests.
- B. Oil and water separator pump outs must be documented. Records must be made available to LOTT staff upon request.

Pretreatment  
LOTT Clean Water Alliance  
500 Adams St. NE  
Olympia, WA 98502



# TREATING VEHICLE AND EQUIPMENT WASTEWATER

*Businesses can reduce their impact with good housekeeping, spill prevention practices, and by treating their wastewater with an oil and water separator.*

## Background

The LOTT Clean Water Alliance and its partner agencies own and operate the public sewer, which could be harmed by pollutants found in wastewater from businesses. LOTT has implemented a program to control these discharges.

LOTT is responsible for ensuring that businesses, including car washes, automotive repair shops, and heavy equipment rentals, comply with certain regulations to prevent the discharge of pollutants to the public sewer.

Wastewater from vehicle and equipment cleaning activities may contain pollutants such as motor oil, heavy metals, solvents, and detergents. These pollutants can harm the microbes necessary to treat water at LOTT's wastewater treatment plants.

Businesses can reduce their impact with good housekeeping, spill prevention practices, and by treating their wastewater with an oil and water separator. This guidance document details wastewater best management practices and LOTT's requirements for separator maintenance.

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**HOUSEKEEPING & SEPARATOR  
MAINTENANCE REQUIREMENTS**

**SPILL PREVENTION, RESPONSE  
& NOTIFICATION**

# HOUSEKEEPING & SEPARATOR MAINTENANCE REQUIREMENTS

## Housekeeping Practices

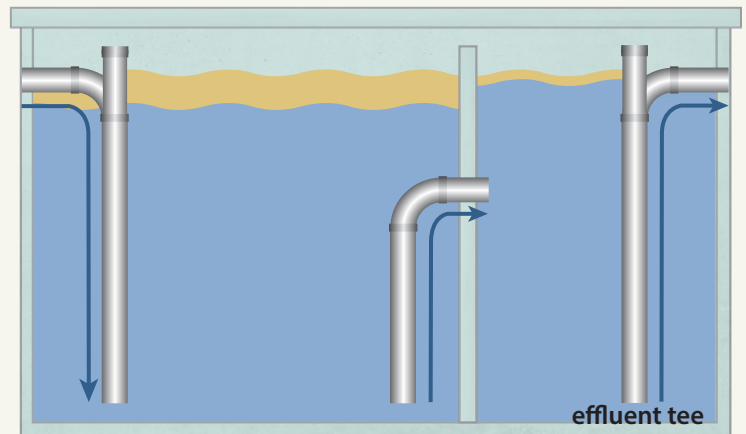
Reducing the amount of pollutants that enter a separator has several benefits, including improving water quality and reducing your costs by extending the amount of time between pump-outs. Diverting solids or oils means you do not have to pay a pumper to remove those materials later. The following housekeeping practices can help reduce pollutants entering a separator.

- Sweep or vacuum floors instead of, or prior to, cleaning with water.
- Use oil absorbents to clean spills instead of, or prior to, cleaning with water.
- Keep fully stocked spill kits readily available.
- Clean spills immediately.
- Install and maintain a dropout box, catch basin, or solids interceptor ahead of the separator to minimize the amounts of sand, dirt, rags, leaves, gravel, and other solids that enter the separator. These solids can be shoveled out before they reach the separator.
- Place petroleum-only absorbent pads or socks in the separator and replace them when they become saturated with oil.



## Separator Maintenance Requirements

How do separators work? Oily wastewater enters the separator, where a baffle pipe or wall slows down the flow. This allows time for oil to float to the top and solids to settle at the bottom. The collected oil is kept in the separator by baffles and pipes that allow water to pass through while keeping oil inside the separator. The final pipe is called an effluent tee. It provides a point for water samples to be collected and keeps oil from entering the sewer. A properly installed and functioning effluent tee is crucial to a separator's operation.



Eventually, a separator will fill with solids. Accumulation of settled solids, sludge, and oil reduces a separator's efficiency. Separators must be maintained in accordance with the manufacturer's specifications. If the manufacturer does not provide maintenance specifications, maintain the separator with the following protocol.

- Remove oil when oil levels reach or exceed a depth of three inches.
- Have the separator pumped out when any of the following criteria are met.
  - The sediment depth in any chamber of the separator exceeds 50% of the total depth or meets or exceeds the bottom level of the outlet pipe, whichever comes first.
  - A significant spill occurs.
  - Oil is visible in the effluent.

Many companies in the Puget Sound region provide separator management services. When selecting a vendor, describe the size of your separator to verify they have the right equipment. Some vendors will need to take a sample of the waste in your separator to properly characterize the waste. This is an indication of a reputable company. When they perform the cleaning, make sure the vendor vacuums all material out of each chamber.

# SPILL PREVENTION, RESPONSE & NOTIFICATION

## Spill Prevention and Response

Spills can be prevented, or their consequences mitigated, by following proper spill prevention practices. These practices are important even if your shop has no floor drains.

- Use pumps to transfer hazardous materials from drums into smaller containers to reduce the potential of a spill from the drum.
- Implement secondary containment measures to store hazardous materials. Secondary containment measures are safety precautions designed to prevent the spread of hazardous materials in the event of a spill or leak. Examples include double-walled containers, spill trays, or dikes used in addition to the product's original container to capture and control a hazardous chemical release.
- Store hazardous materials outside of high traffic areas to prevent them from being accidentally knocked over by people or vehicles.
- Maintain a clearly labeled and prominently displayed spill kit that includes, at minimum:
  - absorbent pads
  - booms or socks
  - absorbent granular material
  - protective equipment, such as gloves and safety glasses
  - thick plastic garbage bags
  - drain covers
- Train employees on how to use the spill kit.

## Notification

Sometimes, despite your best efforts, a spill will end up in the sewer system. If this happens, notify LOTT immediately at (360)528-5700. Let us know your location, type of waste, volume of waste, and any actions you have taken to control the spill. Immediate notification helps us to take steps at the treatment plant to reduce the impact of a spill on our wastewater treatment processes.

Train employees on notification procedures. Post a notice in a prominent location informing staff to immediately contact LOTT in the event of a spill to the sewer.



