



## ANNUAL PRETREATMENT REPORT

NPDES Permit # WA0037061

Reporting Period:  
January 1, 2025, through December 31, 2025

**LOTT CLEAN WATER ALLIANCE**

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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.

2/25/26/  
Date

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

# 2025 ANNUAL PRETREATMENT PROGRAM REPORT

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## INTRODUCTION

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

Each partner adopts LOTT's regulations in its municipal code, and issues wastewater discharge permits. When LOTT determines an IU is not in compliance, the partner jurisdiction follows up with enforcement. This report details pretreatment activities for 2025.

## INDUSTRIAL USER SURVEY ACTIVITY

LOTT surveys non-residential sewer users to meet NPDES Permit requirements. These surveys help identify businesses that may need to follow pretreatment regulations and determine what pollutants they might discharge.

LOTT receives notices from its partners about planned developments. This allows LOTT to notify potential business of pretreatment requirements. LOTT reviewed 18 proposed projects from City of Lacey, 38 from City of Tumwater, and 24 from City of Olympia in 2025.

In addition to reviewing plans, LOTT conducts industry specific surveys at existing facilities to understand their waste practices. Approximately 29 industrial user surveys were conducted in 2025.

## INDUSTRIAL USER NOTIFICATION

Federal Regulations (40 CFR 403.8(f)(2)(iii)) require Publicly Owned Treatment Works (POTWs) to notify IUs of new pretreatment standards and requirements under sections 204(b) and 405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. No new federal pretreatment regulations were implemented in 2025 that required notification.

## INDUSTRIAL USER INSPECTIONS

### Permitted IU Inspections

Wastewater discharge permits are issued to IUs with site-specific requirements including discharge prohibitions, sampling, notification, and reporting requirements. IUs that are required to obtain permits either perform a specific wastewater generating process, discharge over 25,000 gallons of water per day, or have reasonable potential to harm the POTW. LOTT inspected all permitted Industrial Users in 2025.

PERMITTED INDUSTRIAL USER FACILITY INSPECTIONS			
Name	Jurisdiction	Inspection Date	Sample Date
Crown Cork and Seal	Olympia	5/22/2025	5/22/25

<b>PERMITTED INDUSTRIAL USER FACILITY INSPECTIONS</b>			
<b>Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>	<b>Sample Date</b>
A & R Aviation Services	Tumwater	5/22/2025	5/22/25
Georgia Pacific Corporation	Olympia	5/27/2025	5/27/25
International Paper	Lacey	6/10/2025	6/10/25
Pepsi NW Beverages	Tumwater	6/11/2025	6/12/2025
Thurston County Waste and Recovery Center	Lacey	6/24/2025	11/13/2025
J R Setina Manufacturing	Olympia	7/17/2025	Not sampled (zero discharger)
Winsor Fireform, LLC	Tumwater	7/24/2025	Not sampled (zero discharger)
American Benchmark Machine Works	Tumwater	7/25/2025	Not sampled (zero discharger)
Earth Friendly Products	Lacey	7/28/2025	Not sampled (zero discharger)
Port of Olympia	Olympia	8/7/2025	Not sampled (zero discharger)

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

IUs that are not required to obtain discharge permits must still comply with the LOTT Regulations. In addition to routine inspections of Food Service Establishments and Dental Offices, LOTT also inspects other non-permitted IUs. These inspections follow IU surveys and are used to determine whether a facility is complying with the partner jurisdiction’s municipal code and whether a wastewater discharge permit is needed. Below are the non-permitted IU inspections LOTT conducted in 2025.

<b>NON-PERMITTED INDUSTRIAL USER FACILITY INSPECTIONS</b>		
<b>Name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
World Class Distribution Center	Lacey	1/23/2025
Sound Sleep Products	Lacey	1/8/2025
I P Callison & Sons	Lacey	1/21/2025
SPSCC Brewing and Distilling	Tumwater	1/21/2025
Grass Roots Pharmacy	Lacey	1/23/2025
Western Superior Structural	Tumwater	4/8/2025
PR Systems, Inc	Lacey	5/27/2025
Western Transfer	Lacey	7/10/2025
Volkswagen of Olympia	Olympia	12/2/2025
Capitol City Honda	Olympia	12/19/2025

### **Food Service Establishment (FSE) Outreach**

LOTT conducted an outreach campaign in collaboration with its administrative staff to notify FSEs about new grease interceptor requirements that were adopted earlier in the year. As part of this effort, LOTT developed outreach materials—including a fact sheet, best management practices, self-cleaning instructions, and maintenance logbooks—to help businesses

understand and comply with the revised regulations. These materials were assembled into binders and mailed to approximately 200 FSEs that LOTT identified as high-grease-producers. In addition to providing guidance, the binders give businesses a centralized place to store maintenance records that LOTT requires them to keep onsite. Examples of the outreach materials are included in **Appendix A**.



Outreach Binder

Beginning in 2026, LOTT's FSE inspection strategy will change to align with this outreach initiative. Instead of performing random compliance inspections, staff will conduct targeted site visits to ensure that businesses have received the binder and understand the new requirements. Inspection time will be prioritized among preopening inspections of new facilities, partner referral inspections, and variance inspections which are conducted to determine whether a facility may qualify for a reduced pumping frequency under the updated regulations.

### **Food Service Establishment Inspections**

LOTT inspects FSEs to ensure that they are maintaining their grease interceptors. During inspections staff measure grease and sediment levels in the interceptor, review pumping records, and require the business to clean the interceptor if it needs it.

Businesses should clean their grease interceptor when grease and solids take up more than 25% of its working volume, when there are signs of backups, when grease is built up above the water line, or when grease is floating in the effluent. If any parts, such as baffles, are missing, the business must repair the interceptor.

LOTT also receives reports from companies that pump and clean grease interceptors. These reports help LOTT to prioritize inspections by identifying deficiencies that require follow-up. They also identify businesses that are adequately cleaning their interceptors which makes them a lower priority for inspection.

LOTT conducted a total of 44 FSE inspections in 2025 and received about 347 pumper reports. Below are the FSE inspections LOTT conducted in 2025.

<b>FOOD SERVICE ESTABLISHMENT INSPECTIONS</b>		
<b>Company name</b>	<b>Jurisdiction</b>	<b>Inspection Date</b>
Oyster House	Olympia	1/7/2025
Anthony's Hearthfire Grill	Olympia	1/14/2025
23 Kitchens	Lacey	1/21/2025
Carl's Jr	Lacey	1/27/2025
Cafe Elite	Olympia	1/29/2025
Cafe Elite	Olympia	1/30/2025
Corona's Taqueria y Mas	Lacey	2/18/2025
The Lovely and Dapper Bakery	Olympia	2/20/2025

<b>FOOD SERVICE ESTABLISHMENT INSPECTIONS</b>		
Starbucks # 67285	Lacey	3/6/2025
Taco's California	Olympia	3/12/2025
Smashed Halal Burger	Lacey	3/25/2025
Starbucks # 67285	Lacey	4/9/2025
Northwest Meats	Lacey	4/9/2025
Ralph's Thriftway	Olympia	4/23/2025
Yummy Panda	Lacey	4/29/2025
Ralph's Thriftway	Olympia	6/3/2025
Jake's On 4th	Olympia	7/9/2025
Brewhouse Grill	Tumwater	8/12/2025
Cooper's Food and Drink	Lacey	8/14/2025
Cynara Restaurant & Lounge	Olympia	8/26/2025
Budd Bay Cafe	Olympia	8/26/2025
Evergreen Christian Community	Olympia	9/23/2025
Airport Shell	Tumwater	9/23/2025
Happy Teriyaki #3	Lacey	9/23/2025
Amanda's Commissary	Olympia	9/25/2025
The Lovely and Dapper Bakery	Olympia	9/25/2025
Evergreen State College	Olympia	9/30/2025
Flying J Pilot Travel Center	Tumwater	10/1/2025
Airport Shell	Tumwater	10/21/2025
Charro	Olympia	10/28/2025
Chick-fil-A	Olympia	11/7/2025
Trader Joe's #292	Lacey	11/18/2025
Jaded Sips	Olympia	11/19/2025
New Star Seattle Properties	Tumwater	11/26/2025
Cascadia Grill	Olympia	11/26/2025
Chipotle #5281	Tumwater	12/3/2025
Cynara Restaurant & Lounge	Olympia	12/4/2025
Hector's Tacos	Olympia	12/4/2025
Black Bear Diner	Olympia	12/9/2025
Tumwater Trading Post	Tumwater	12/10/2025
Taco Time	Olympia	12/17/2025
Trader Joe's #292	Lacey	12/22/2025
Bite Me Catering	Olympia	12/23/2025
Amanda's Commissary	Olympia	12/29/2025

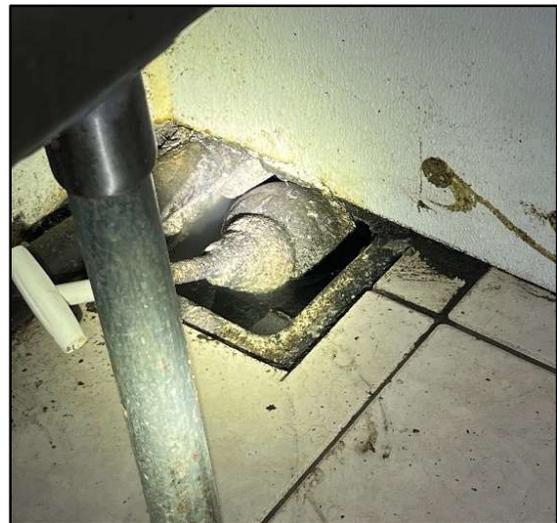
## PARTNER/INTERAGENCY COLLABORATION

### Partner Referrals

At the request of partner jurisdictions, LOTT conducts inspections when issues are identified in the collection system. LOTT completed eleven inspections in response to partner referrals in 2025. The summaries below highlight several of these inspections.

#### **Café Elite**

LOTT inspected *Café Elite* on September 5, 2025, in response to a referral from Thurston County Environmental Health regarding standing wastewater observed in a floor sink. The inspection found that the grease interceptor lacked sufficient slope (“fall”) to allow proper drainage; however, the interceptor was otherwise in good working condition. The business owner resolved the issue by installing a new, above-grade grease interceptor.



Plunger in floor drain with standing water

#### **Jean Pierre 316**

LOTT inspected *Jean Pierre 316* on September 9, 2025, in response to a referral from the City of Tumwater regarding excess grease observed in the sewer lift station downstream of the restaurant. During the inspection, LOTT found that the grease interceptor was being maintained only once every six months and that several grease-producing fixtures were not connected to the interceptor. Staff informed the business owner of proper self-cleaning practices and required the interceptor to be cleaned every two weeks. The owner was also notified that if grease accumulation is detected again in the sewer system, the fixtures may be required to be plumbed into the interceptor.



Hydromechanical Grease Interceptor

## Charro

LOTT inspected *Charro* on October 28, 2025, in response to a referral from the City of Olympia regarding a grease-related sewer blockage. The inspection confirmed that all grease-producing fixtures were properly connected to the grease interceptor, and the business was directed to follow a quarterly cleaning schedule. Because the facility had only recently begun operating, it is possible that the blockage was caused by a previous operator or by another nearby establishment.



Sewer Overflow

## Joint Inspections

LOTT works with staff from its partner jurisdictions and other agencies to conduct inspections together. These inspections may be conducted with Ecology representatives, designated partner contacts, building officials, health inspectors, collection system operators, water resource specialists, or storm water inspectors. There are several reasons why joint inspections are helpful:

- They strengthen working relationships between LOTT and its partners.
- They show the facility being inspected that LOTT and its partners cooperate and share information.
- They help partners learn more about LOTT's pretreatment program, and vice versa.

In 2024, LOTT started performing pre-opening inspections of FSEs with the Thurston County Department of Environmental Health. These inspections continued in 2025. As the name implies, pre-opening inspections are performed when a business is ready to open but is not yet open to the public. These early inspections are helpful because:

- The business owners are not distracted since they aren't busy serving customers.
- Problems can be identified and fixed while contractors like plumbers are still on site.
- Teaching businesses how to maintain their grease interceptors from day one can prevent future grease related issues.

LOTT conducted 27 joint inspections in 2025. The summaries below highlight several of these inspections.

## **Airport Shell**

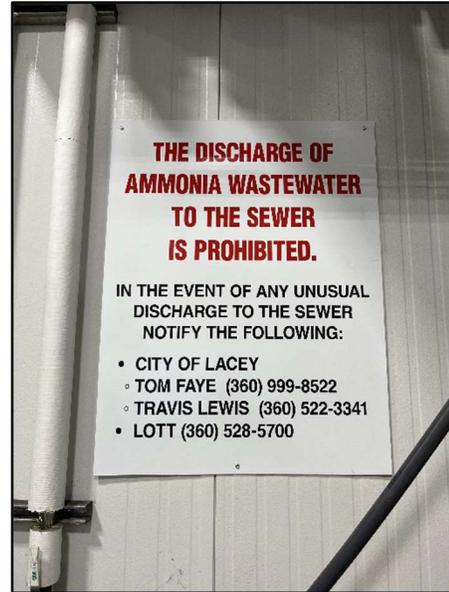
LOTT inspected Airport Shell on September 23, 2025, with the City of Tumwater and the Thurston County Department of Environmental Health. The inspection was conducted in response to a report that wastewater from the *La Regia* food truck had been dumped into a storm drain. During the inspection, LOTT learned that there was an on-site grease interceptor that had not been pumped in years. LOTT required the grease interceptor to be pumped, and the food truck was notified that it must discharge its wastewater into a sink connected to the interceptor.

## Whole Foods Distribution Center

LOTT inspected Whole Foods Distribution Center on September 26, 2025, with a City of Lacey stormwater inspector. LOTT joined the inspection to verify that their floor drains were still sealed, and that signage specifying notifications procedures for unusual discharges was in place. The facility was in compliance.

## Chick-fil-A

On November 7, 2025, LOTT conducted a pre-opening inspection with Thurston County Environmental Health. Kitchen fixtures were dye-tested and verified to be connected to the interceptor. The interceptor was also checked to ensure that it had the correct piping. The business owner was provided with outreach materials for maintenance and notified that the interceptor needed to be maintained



Sign inside Whole Foods



Chick-fil-A Grease Interceptor

## **STEP load coordination and sampling**

In June 2024, the Budd Inlet Treatment Plant experienced an operational upset that nearly resulted in a permit violation. This occurred during LOTT's Biological Nutrient Removal (BNR) season, when nitrifying microorganisms (which are highly sensitive to toxic discharges) are actively cultivated. The upset was attributed to discharges from Septic Tank Effluent Pump (STEP) loads.

In response, LOTT collaborated with the Cities of Olympia and Lacey and implemented several operational changes to reduce the impact of STEP loads. Large STEP loads were rescheduled to the winter months, outside the BNR season, and remaining loads were distributed more evenly throughout each month to limit daily volume spikes.

To better understand how STEP loads affect the biological treatment process, LOTT developed a sampling plan to characterize the waste in STEP tanks. The sampling effort aimed to evaluate pollutant concentrations and assess differences based on tank type, age, and source. Staff collected and analyzed approximately one hundred samples.

LOTT also contracted with Brown and Caldwell to conduct a statistical analysis and an inhibition study. The study focused on determining "inhibition values"—pollutant concentrations at which adverse effects occur in secondary treatment processes. Analyzed pollutants included metals, biochemical oxygen demand (BOD), total suspended solids (TSS), ammonia, and quaternary ammonia compounds.

Initial bench-scale screening was performed at the Budd Inlet Treatment Plant to identify pollutant concentrations for a follow-up confirmation test. The confirmatory inhibition testing was conducted at Brown and Caldwell's Tennessee laboratory using a bench-scale treatment system seeded with activated sludge from LOTT's biological process. The sludge was exposed to STEP waste and to copper and zinc standards. The confirmation testing may be repeated in 2026 to ensure that the bench test represents real world conditions at the Budd Inlet Treatment Plant. These results will be used to help to inform LOTT about the impact of STEP loads to augment past operational experiences.



LOTT staff collecting a STEP sample

## INDUSTRIAL USER CHANGES

### Wastewater Discharge Permits Renewed in 2025

The following wastewater discharge permits were renewed in 2025:

INDUSTRY	TYPE	STATUS	LOCATION	DATE RENEWED
Pepsi NW Beverages LLC	Non-Alcoholic Beverage Manufacturer	SIU	Tumwater	September 18, 2025
American Benchmark Machine Works	Metal Finisher	NSCIU	Tumwater	October 15, 2025
Earth Friendly Products	Detergent Manufacturer	NSCIU	Lacey	December 7, 2025
A&R Aviation	Metal Finisher	SIU	Tumwater	December 20, 2025

### New Wastewater Discharge Permits Issued in 2025

No new wastewater discharge permits were issued in 2025.

## INDUSTRIAL USER MONITORING SCHEDULE

Permittee	POTW Sampling Frequency			Inspection Frequency	
	Performed 2025	Planned 2026	Split Sampling?	Performed 2025	Planned 2026
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
Thurston County Waste and Recovery Center	1	1	Not performed	1	1
Winsor Fireform, LLC	0	0	Not performed	1	1

## ENFORCEMENT ACTIVITY

The following section details 2025 compliance and enforcement activity. The table below lists the industrial users (permitted and unpermitted) that required enforcement activity in 2025. Results of permitted industrial users monitoring and significant non-compliance review are included in pages 8.1-8.9. No IUs were in significant non-compliance during this reporting period.

Industrial User	Address	Jurisdiction	Violation	Enforcement Action
Crown Cork and Seal	1202 Fones Rd.	Olympia	7/1/2025 Wastewater Discharge Permit OL-002 Section 2.1	Verbal Warning
Thurston County Waste and Recovery Center	2418 Hogum Bay Rd NE	Lacey	4/1/2025 Wastewater Discharge Permit LA-00 Section 2.1	Verbal Warning

### Crown Cork and Seal

LOTT issued Crown Cork and Seal a verbal warning on August 6, 2025, for failure to submit BOD, TSS and Mercury results for the first semi-annual monitoring event. All later reports were in compliance.

### Thurston County Waste and Recovery Center

LOTT issued Thurston County Waste and Recovery Center a verbal warning on March 24, 2025, for failure to submit results for Total Suspended Solids. All later reports were in compliance.

## POTW INTERFERENCE OR PROBLEMS

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

## RESOURCE SUMMARY

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

LINE ITEM	BUDGETED	
	2025	2026
Salaries	\$ 238,848	\$ 253,489
Benefits	\$ 99,844	\$ 100,803
Operating Supplies, Small Tools & Equip, Safety Equip, & Specialty Materials	\$ 10,000	\$ 10,000
Clothing	\$ 1,000	\$ 1,000
Books & Manuals	\$ 220	\$ 220
Office Equipment	\$ 2,600	\$ 2,600

LINE ITEM	BUDGETED	
	2025	2026
Professional Services	\$ 11,100	\$ 11,100
Mobile Phones	\$ 200	\$ 200
Per Diem, Lodging, Mileage, Airfare, & Parking	\$ 2,500	\$ 2,500
Advertising	\$ 680	\$ 680
Training Registration & Certification Fees	\$ 1,500	\$ 1,500
Printing & Binding	\$ 625	\$ 625
Postage	\$ 550	\$ 550
<b>TOTAL</b>	<b>\$369,667</b>	<b>\$ 382,267</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 wastewater treatment related revenue.

## **PROGRAM CHANGES**

### **Substantial Modifications To The Pretreatment Program 2025**

No substantial program modifications were made in 2025.

### **Proposed Substantial Modifications To The Pretreatment Program 2026**

No substantial program modifications are proposed for 2026.

### **Minor Modifications To The Pretreatment Program 2025**

The following minor program modifications were made in 2025.

#### **Pretreatment Program Manual Enforcement Response Plan**

A revised Enforcement Response Plan is submitted to Ecology with this report. The updated plan was approved by LOTT's Technical Subcommittee on February 5, 2026. Revisions were made to address requirements identified during an Ecology audit. Updates include incorporating current staff titles, adding enforcement response procedures for Food Service Establishments and temporary groundwater dischargers, and formalizing processes for providing pre-enforcement education and outreach.

## **Proposed Minor Modifications To The Pretreatment Program 2026**

### **Program Manual Updates**

In 2026, LOTT will update sections of its Pretreatment Program Manual to include procedures for implementing the new FOG program requirements, and other necessary updates.

LOTT updated its regulations in 2025 to require, among other changes, mandatory time-based grease interceptor cleaning frequencies. As part of these revisions, LOTT established a process for granting variances to the required cleaning frequency. The manual updates will include procedures describing how LOTT will receive variance requests from businesses and how variances will be granted or denied based on grease interceptor inspections.

LOTT now requires certain Food Service Establishments (FSEs) to submit reports when their grease interceptor is pumped. To support this effort, LOTT now uses two online reporting platforms —OnlineRME and FOG BMP— to allow electronic report submission. Grease pumpers, many of whom already use these platforms, may submit pumping reports on behalf of the businesses they service. The manual updates will explain how LOTT will use these reports to conduct focused inspections.

LOTT is also implementing a Pumper Program to formalize its relationship with grease pumpers. Participating pumpers agree to clean interceptors according to LOTT's standards and submit reports on behalf of the restaurant. LOTT will provide FSEs with a list of participating pumpers upon request so they can select companies that have certified, in writing, that they follow LOTT's cleaning standards. The manual updates will describe this program.

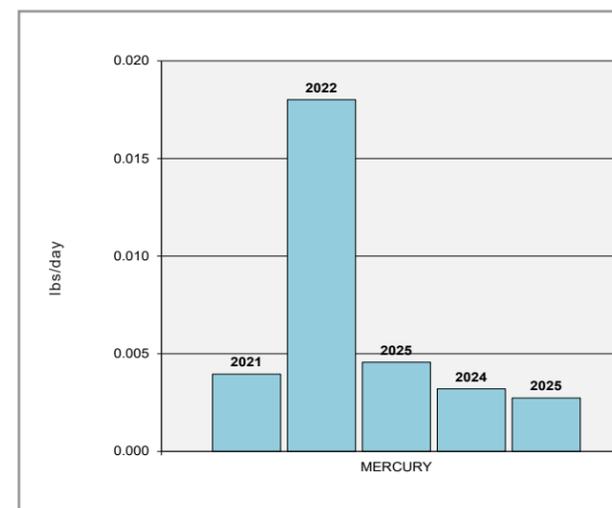
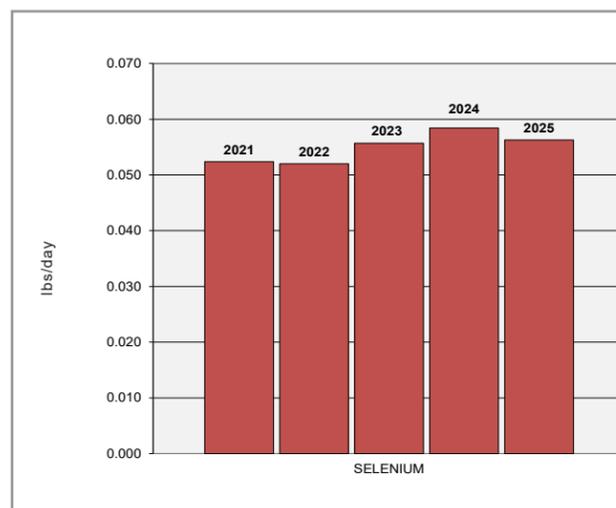
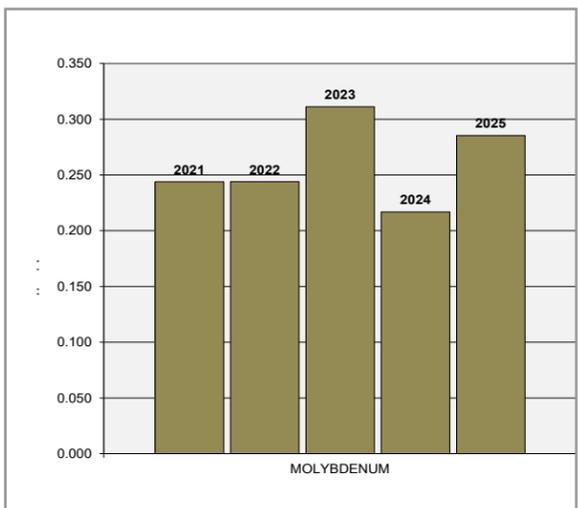
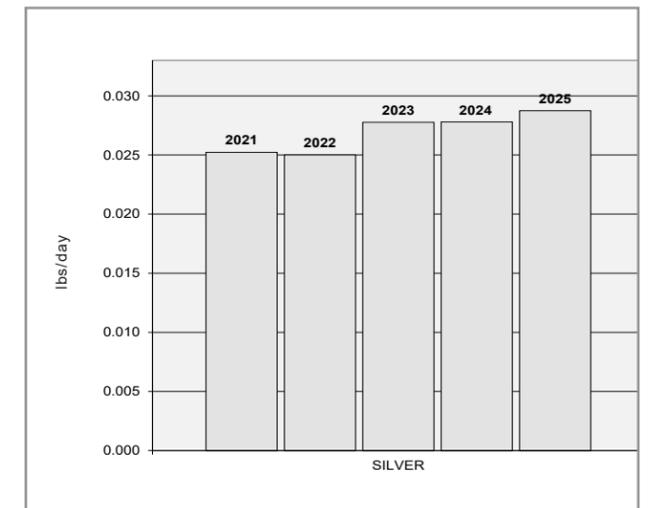
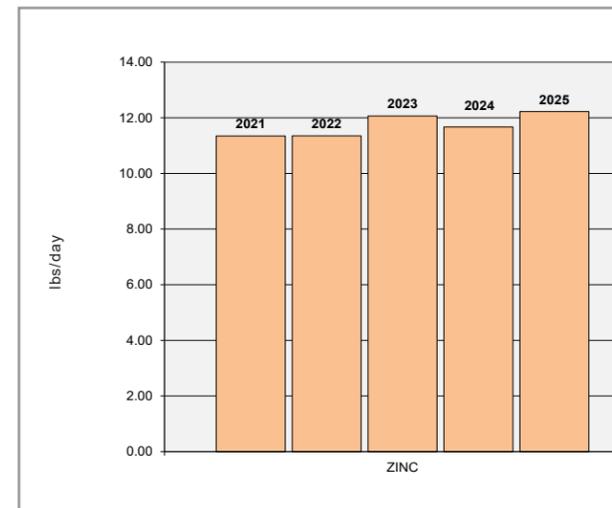
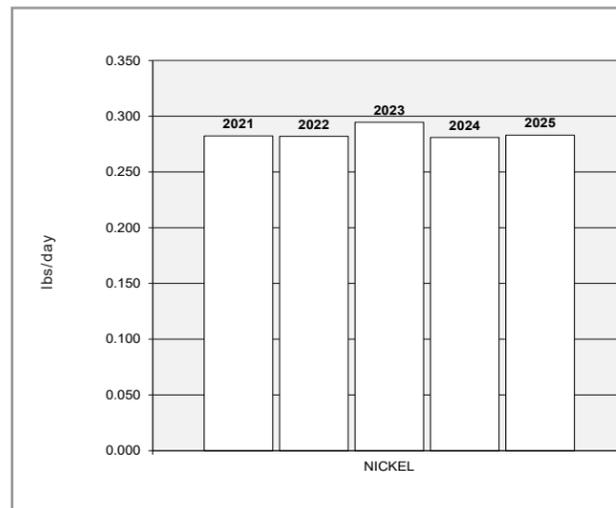
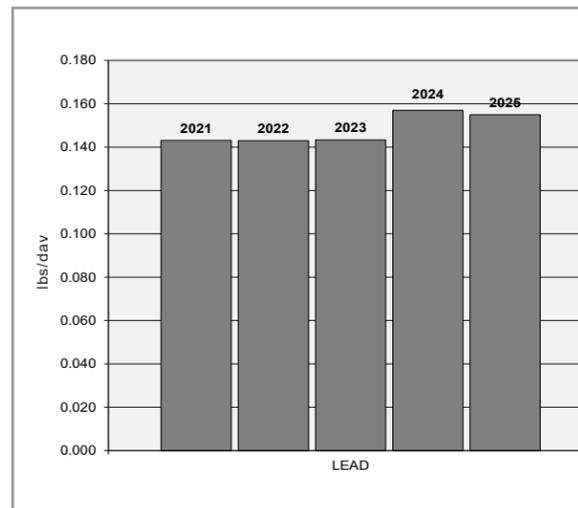
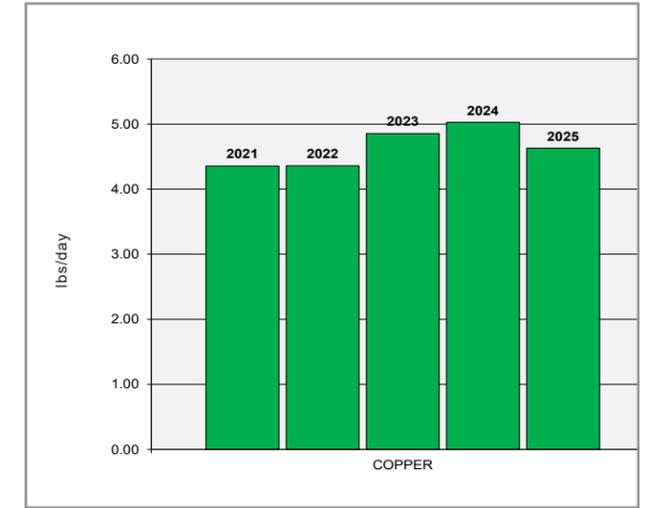
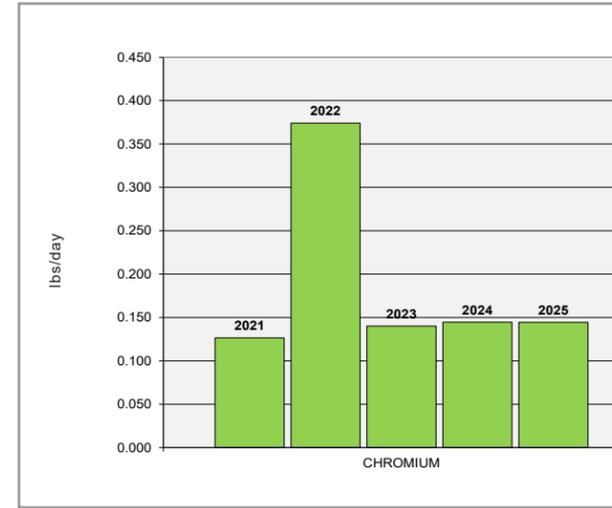
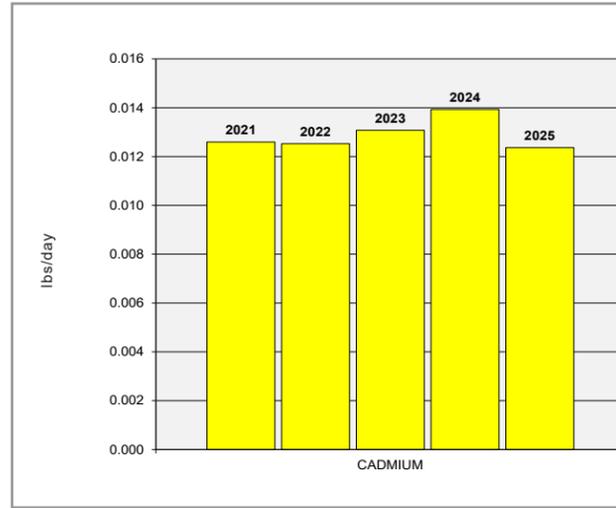
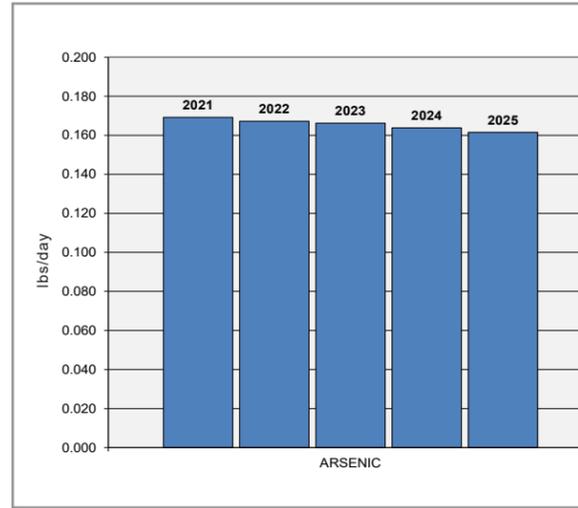
### **ORDINANCE REVISIONS**

On February 12, 2025, the LOTT Board approved revisions to LOTT's Discharge and Industrial Pretreatment Regulations. The revisions were made to address findings of Ecology Audits and include:

- Time based cleaning frequencies and installation requirements for grease interceptors.
- Establishment of a Molybdenum Local Limit.
- Update of criminal penalties to agree with State Law.
- Correction of typographical errors.

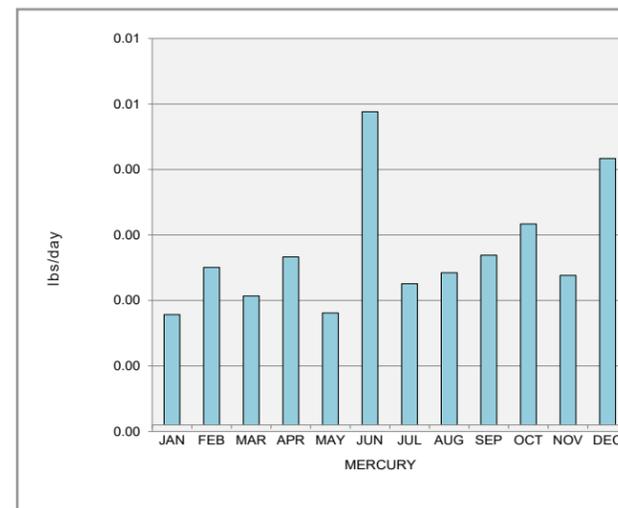
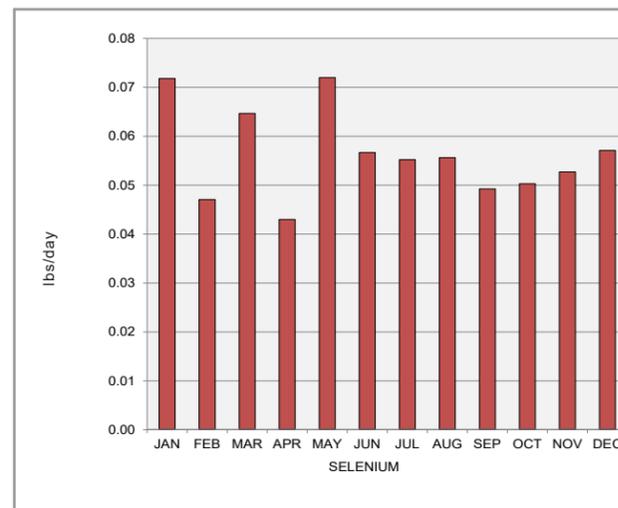
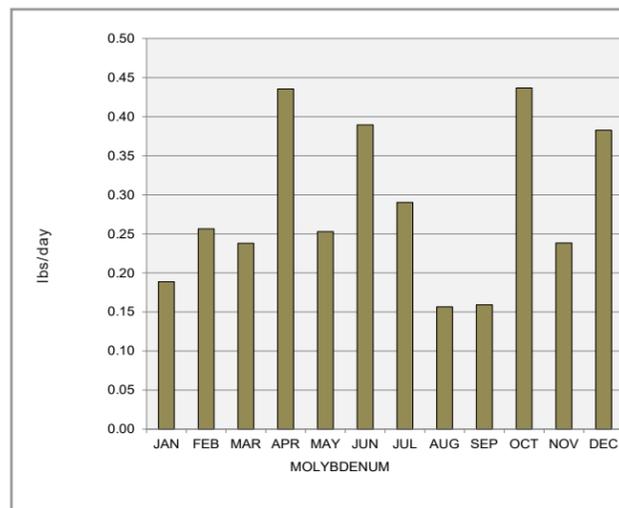
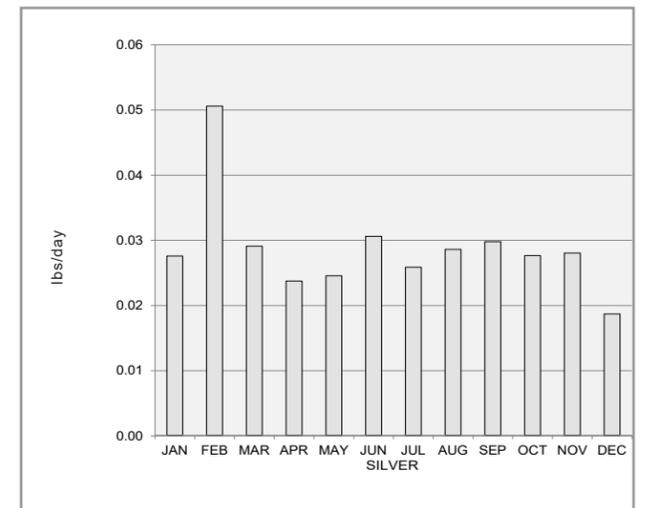
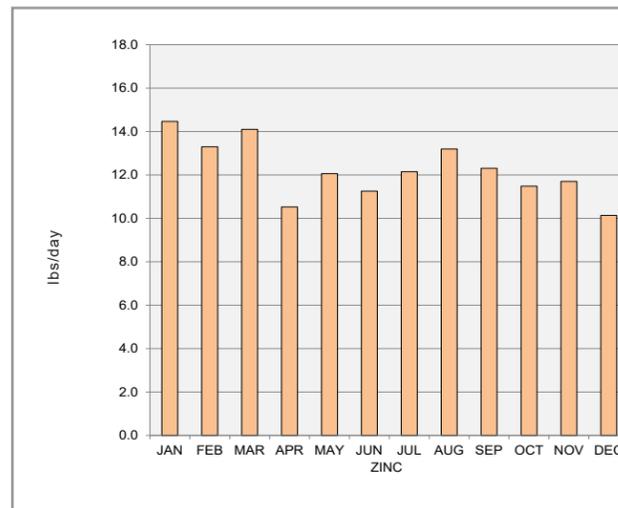
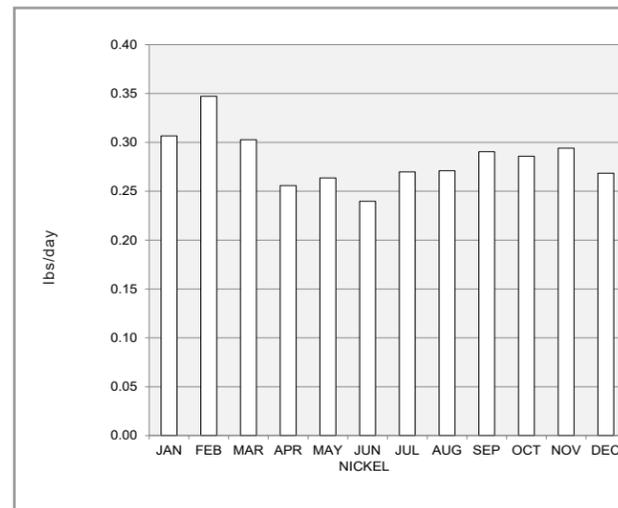
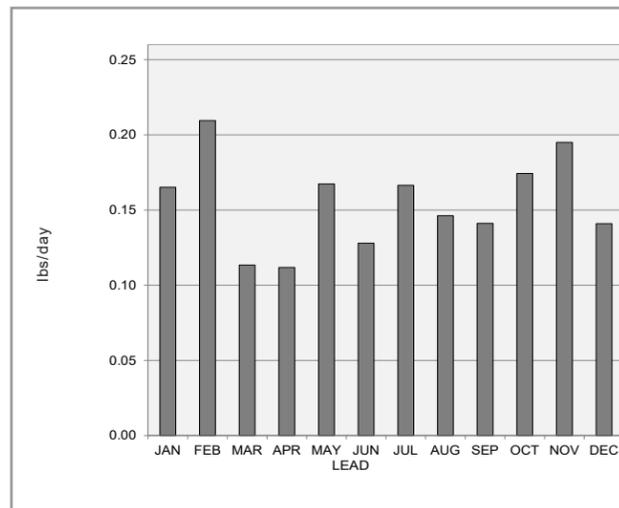
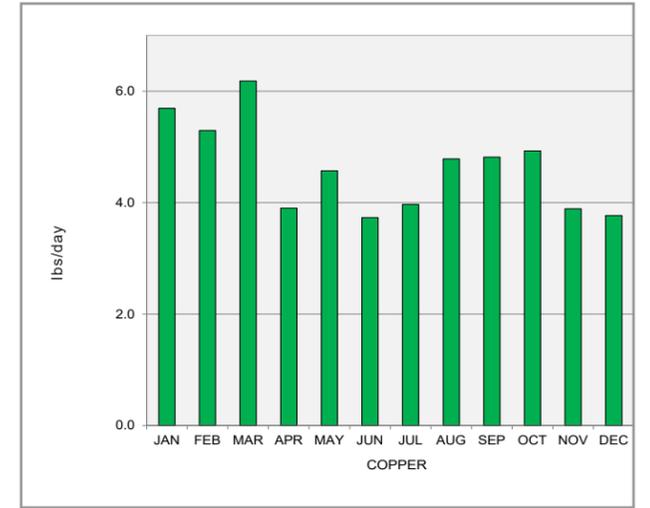
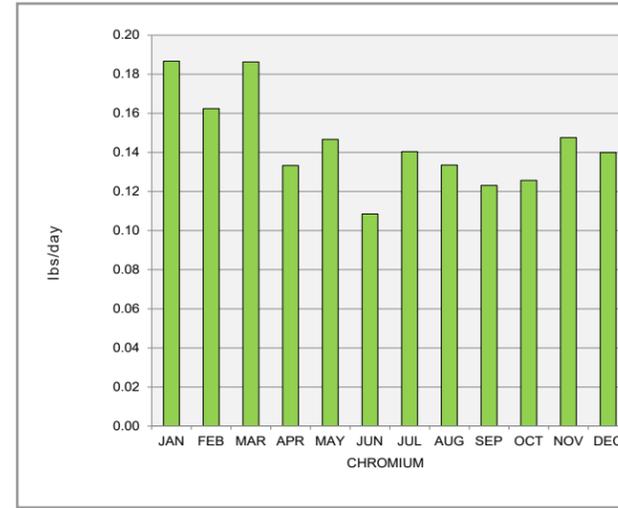
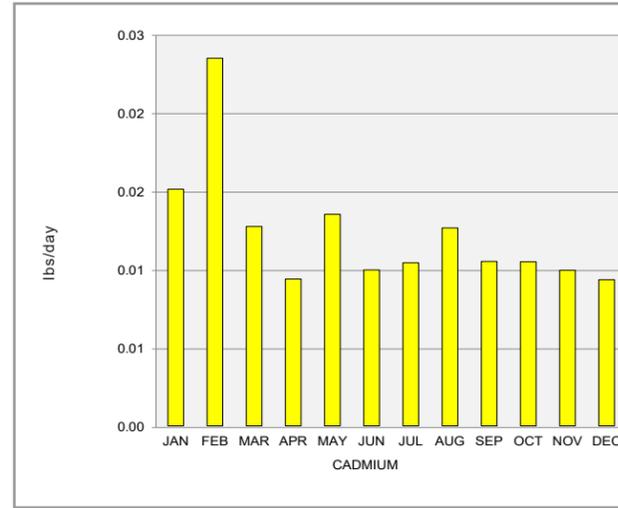
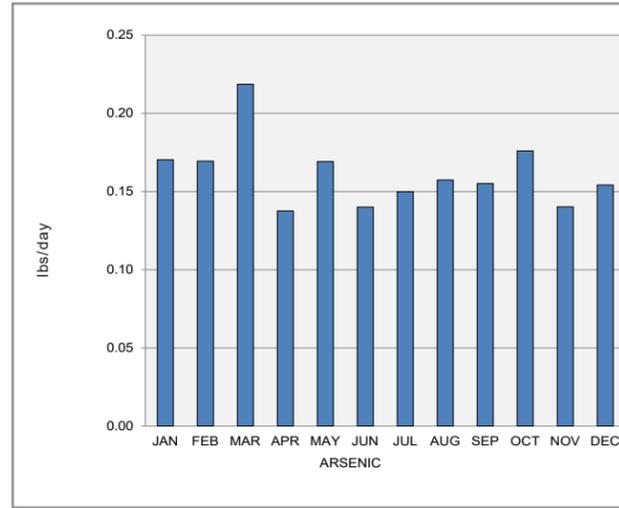
A copy of the revised regulations is included in **Appendix B**.

# BUDD INLET TREATMENT PLANT INFLUENT METALS LOADING TRENDS 2021–2025

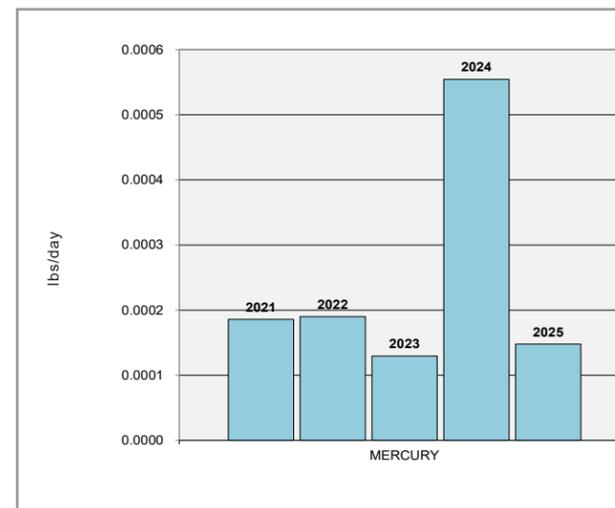
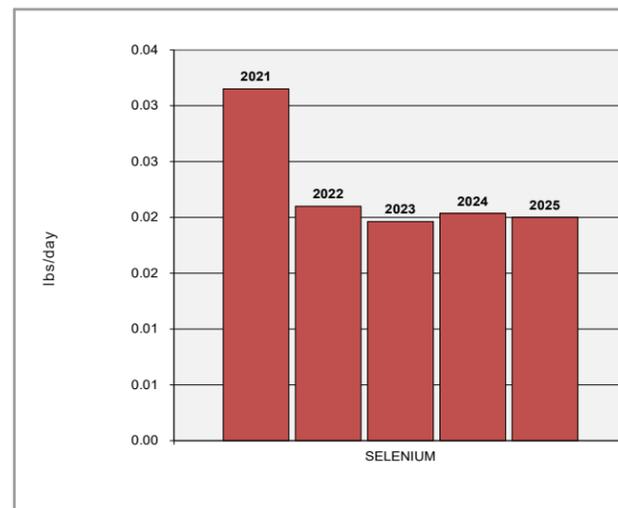
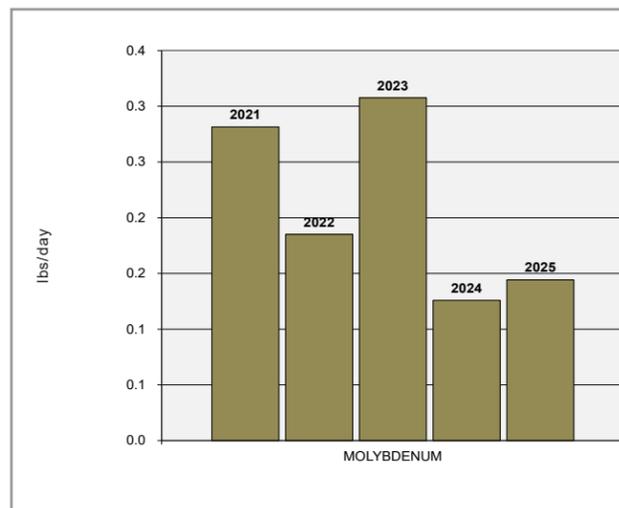
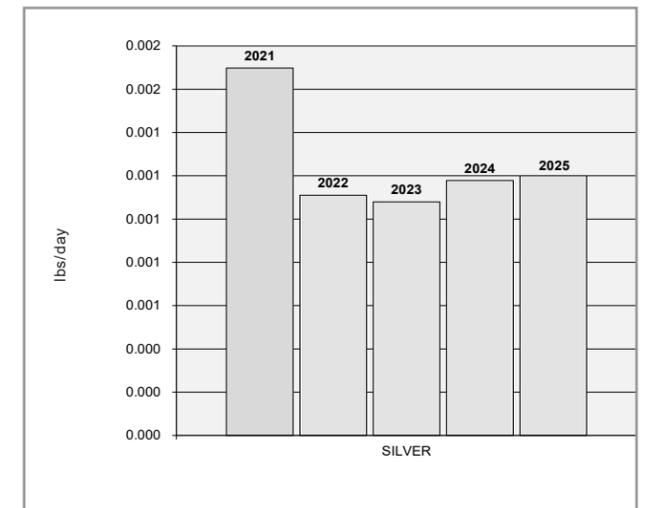
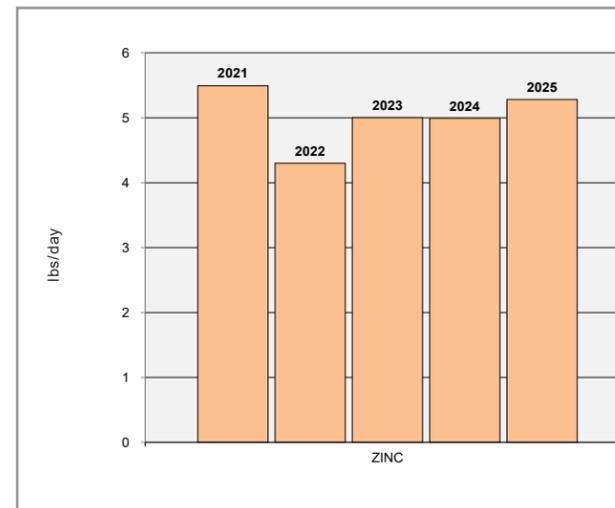
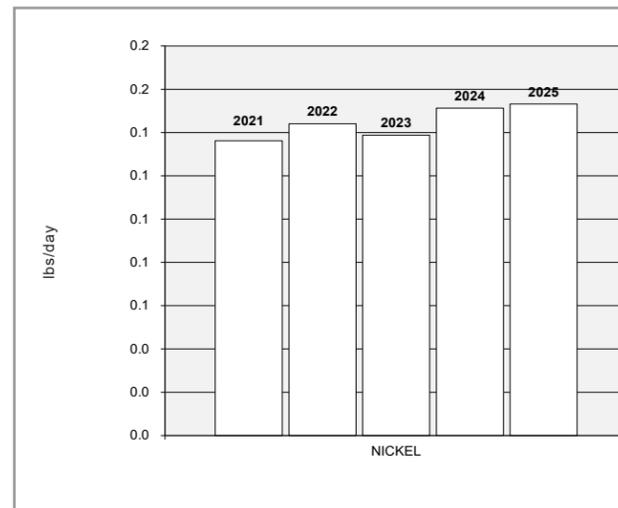
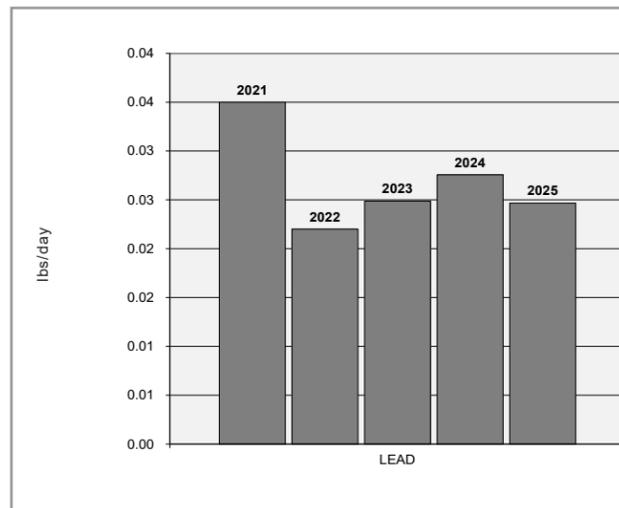
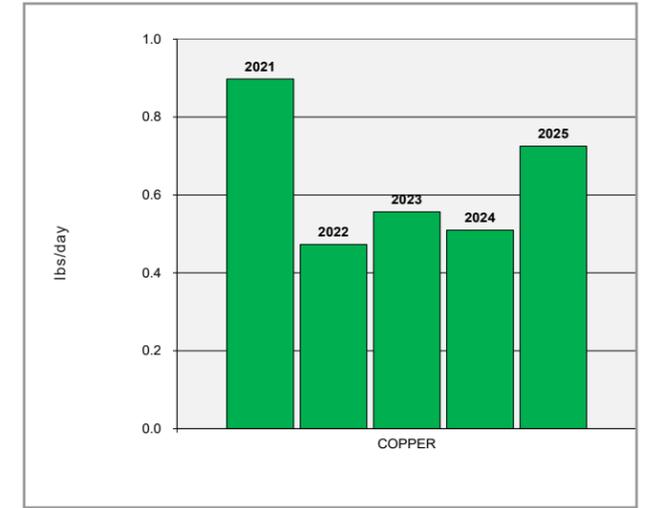
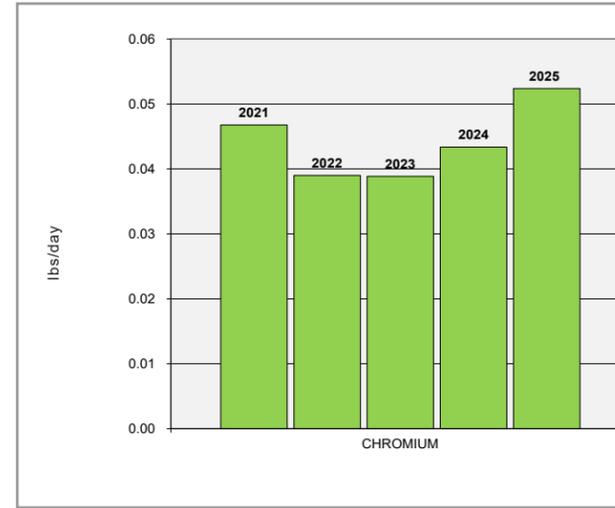
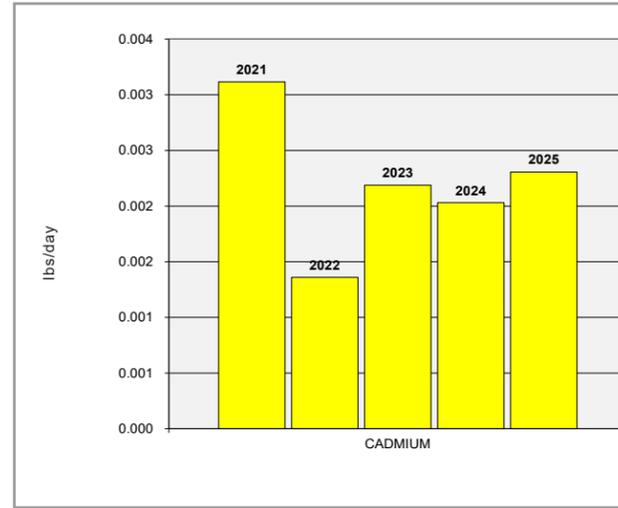
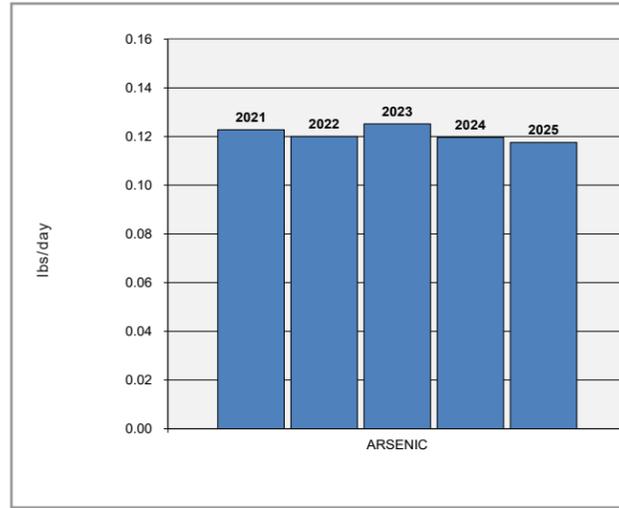


# BUDD INLET TREATMENT PLANT

## INFLUENT METALS LOADINGS JANUARY–DECEMBER 2025

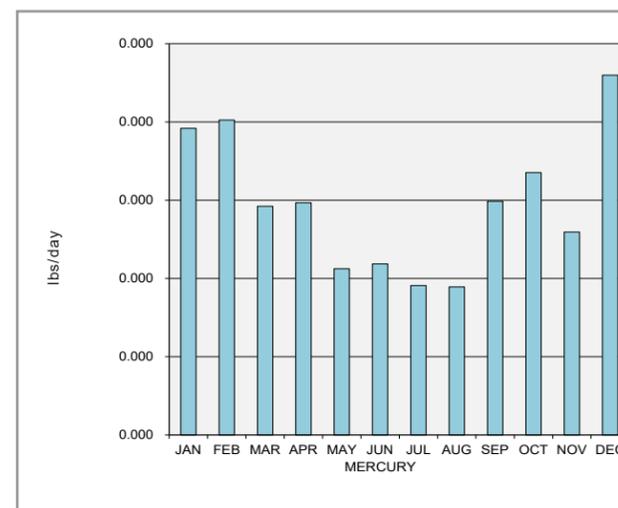
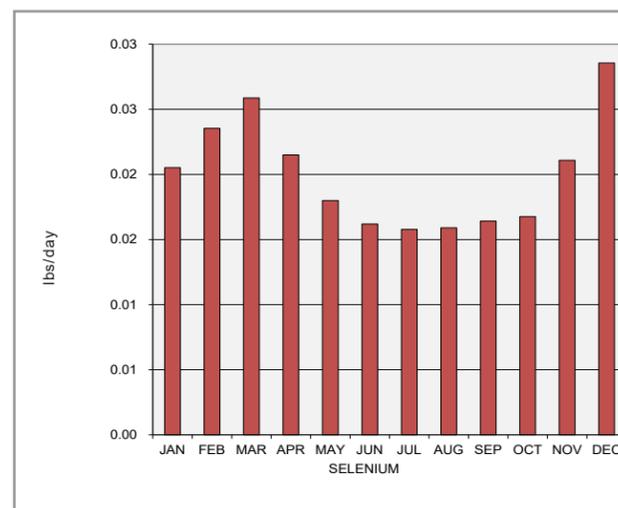
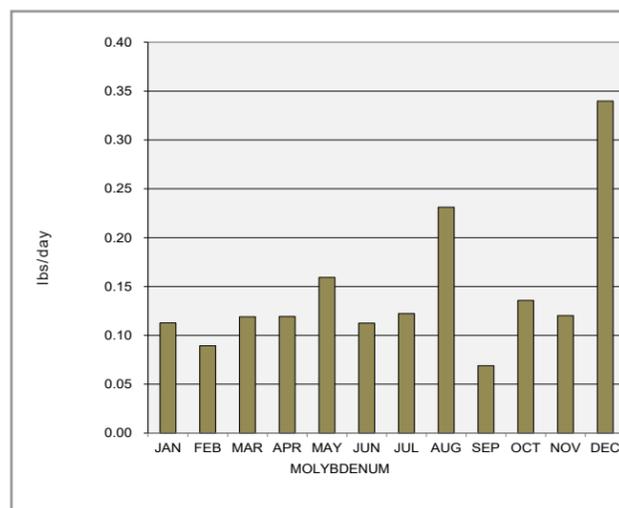
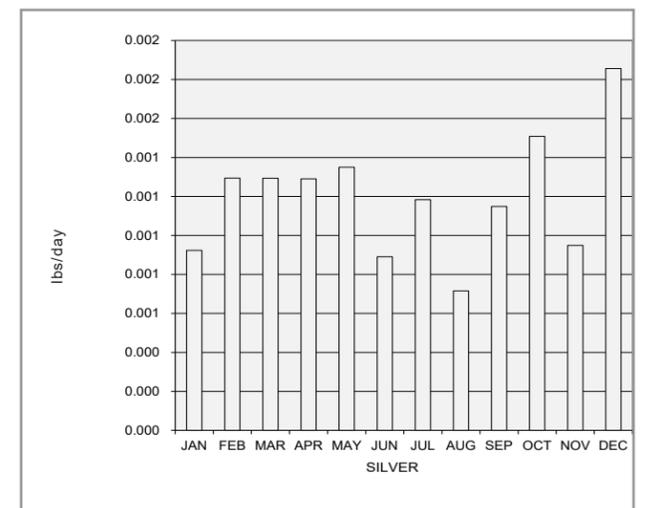
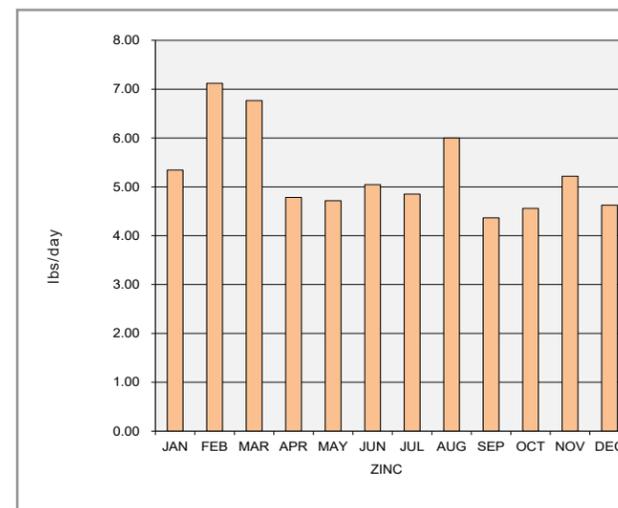
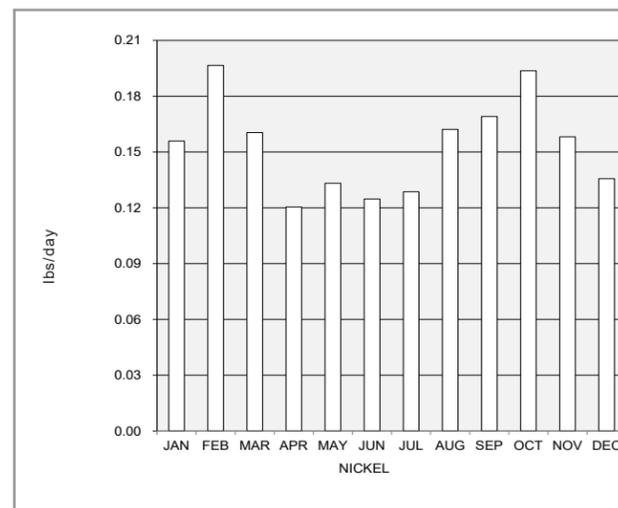
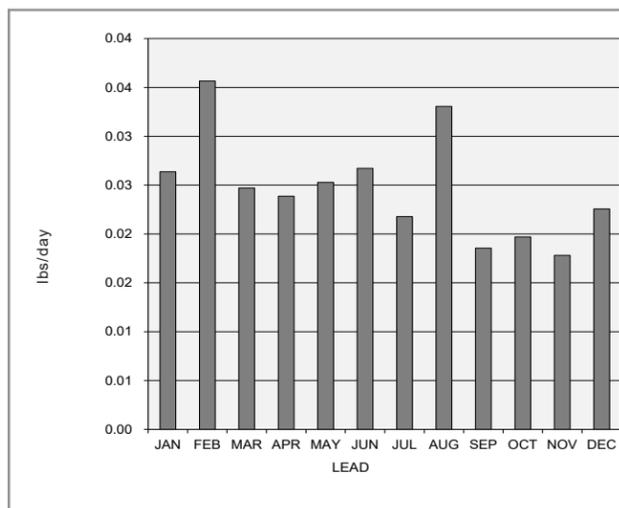
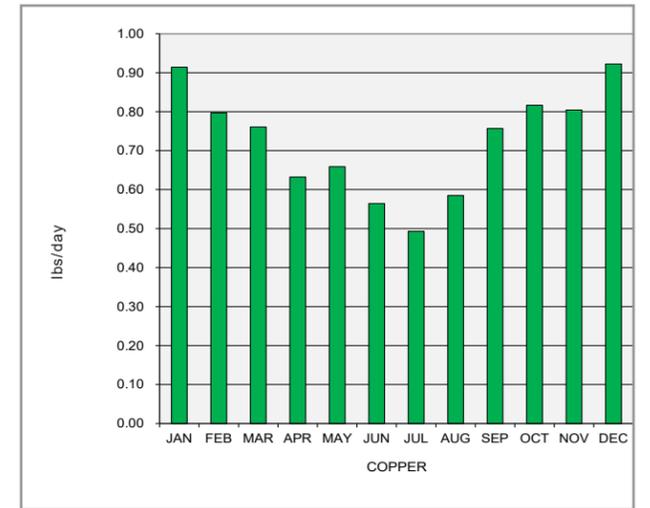
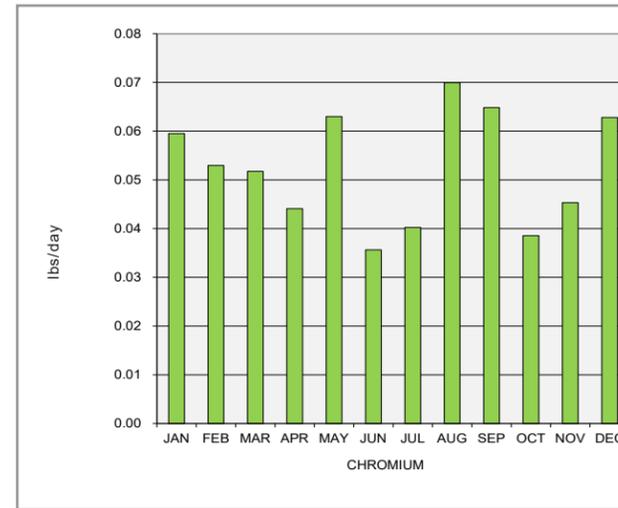
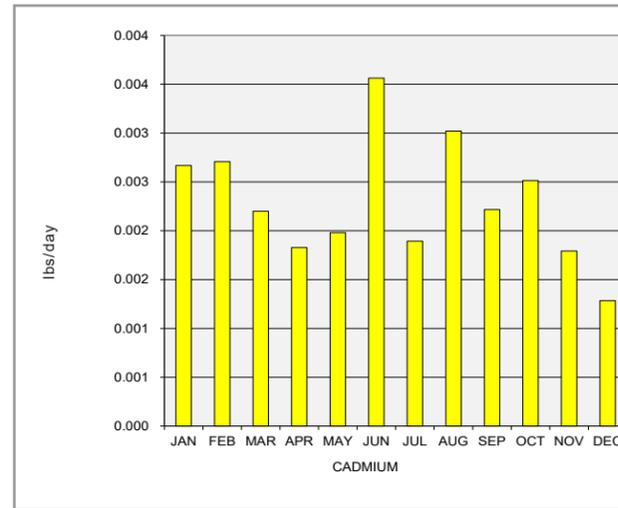
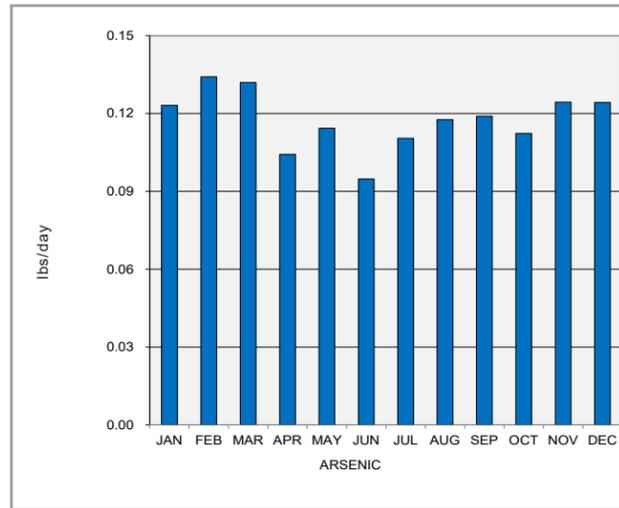


# BUDD INLET TREATMENT PLANT FINAL EFFLUENT METALS LOADING TRENDS 2021–2025



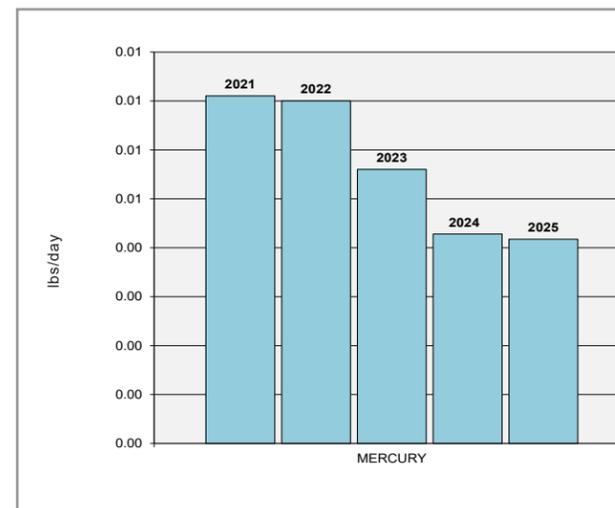
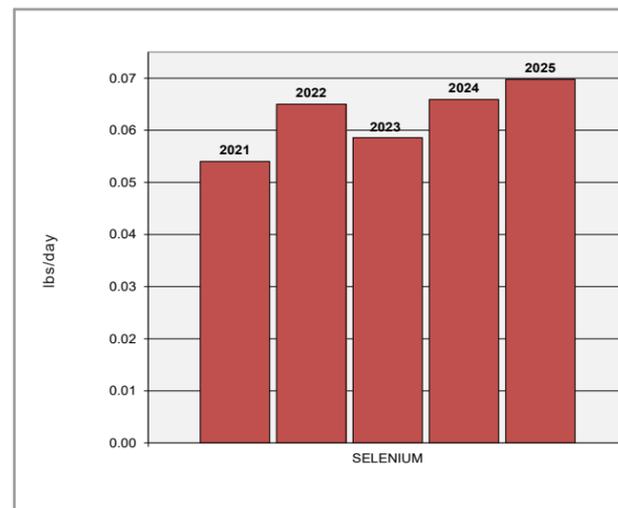
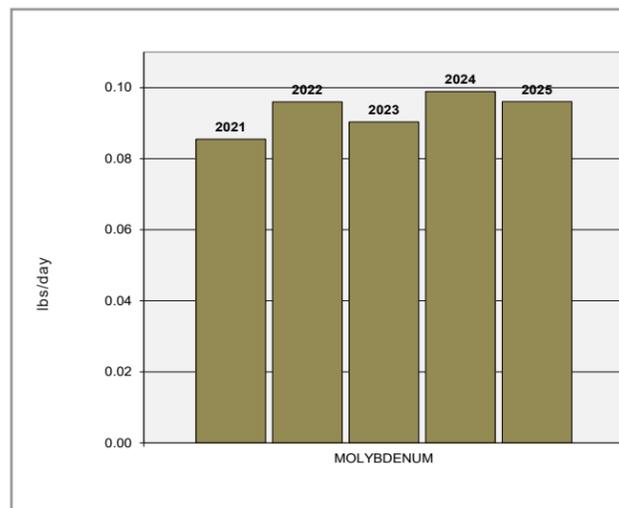
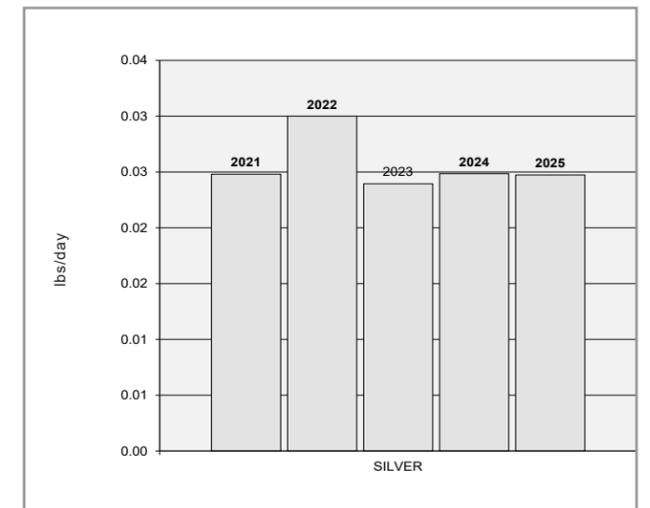
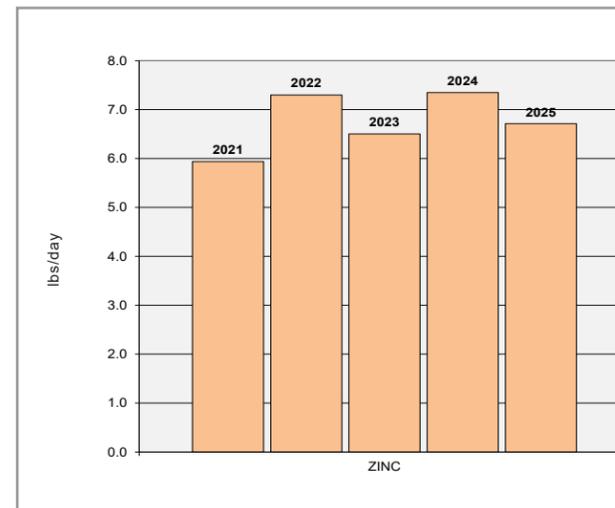
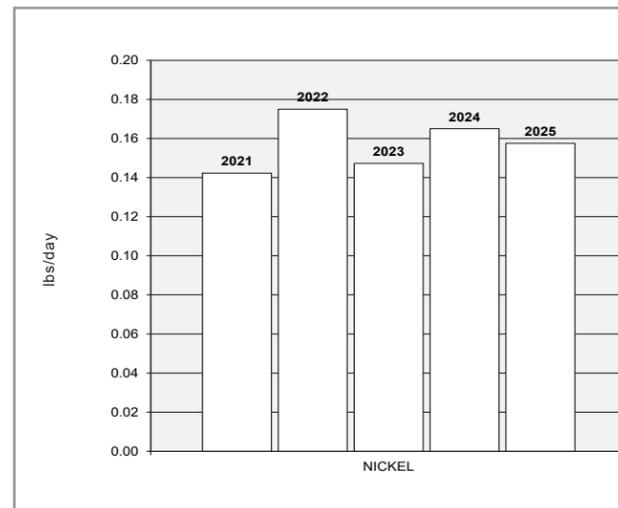
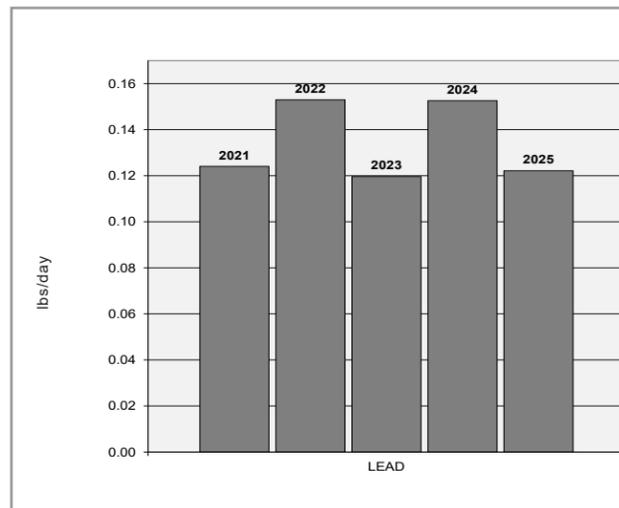
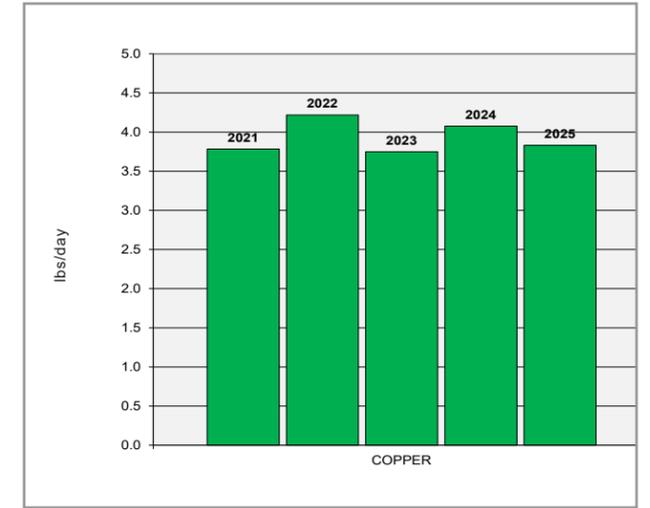
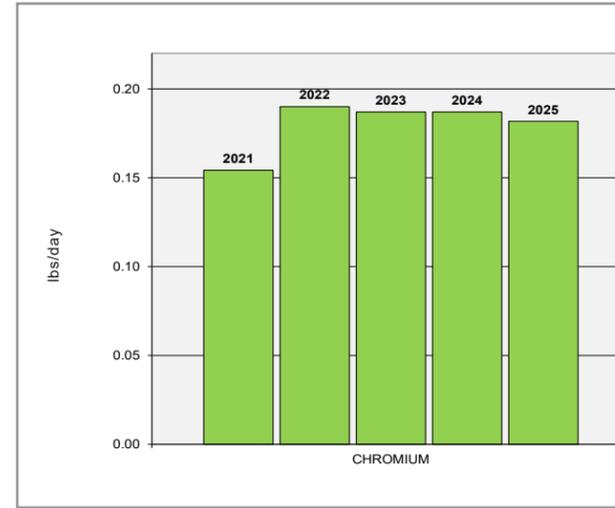
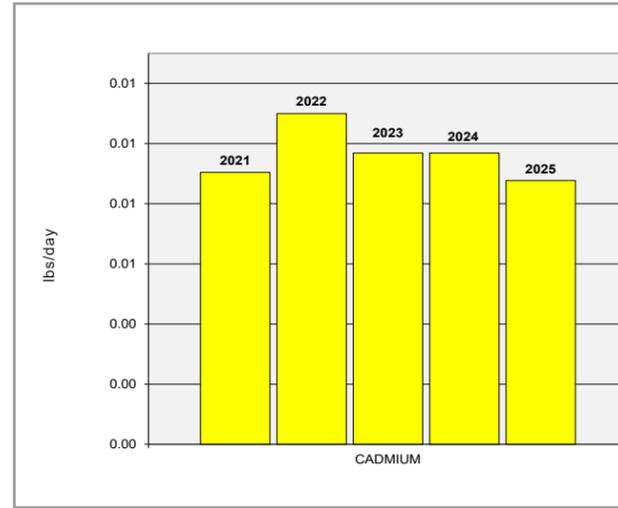
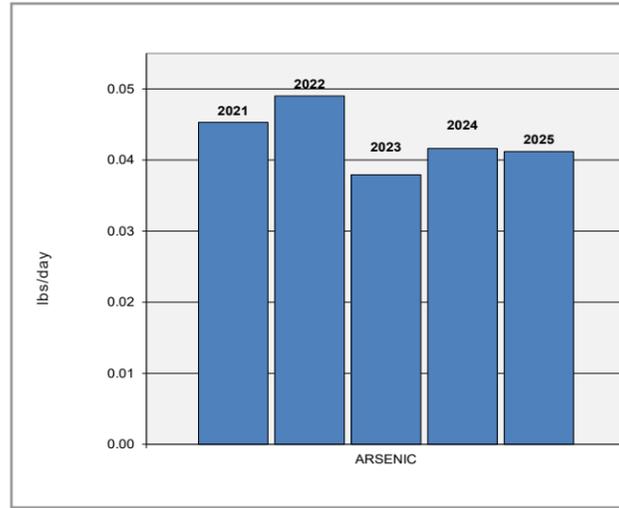
# BUDD INLET TREATMENT PLANT

## FINAL EFFLUENT METALS LOADINGS JANUARY–DECEMBER 2025



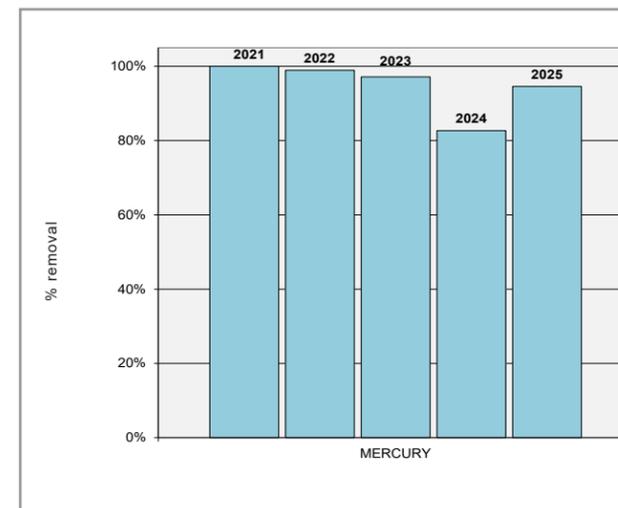
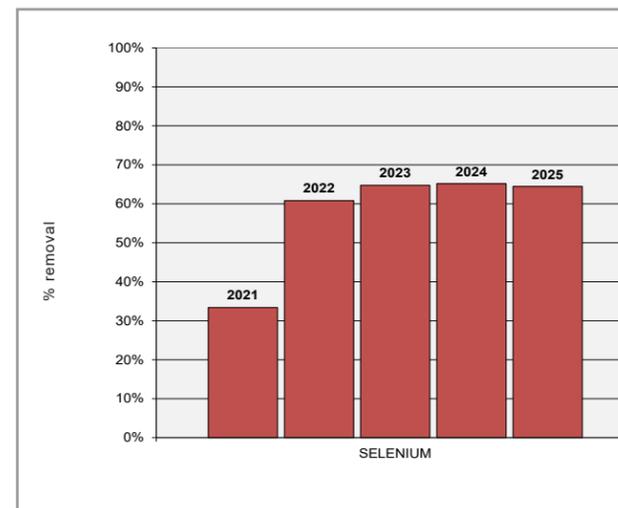
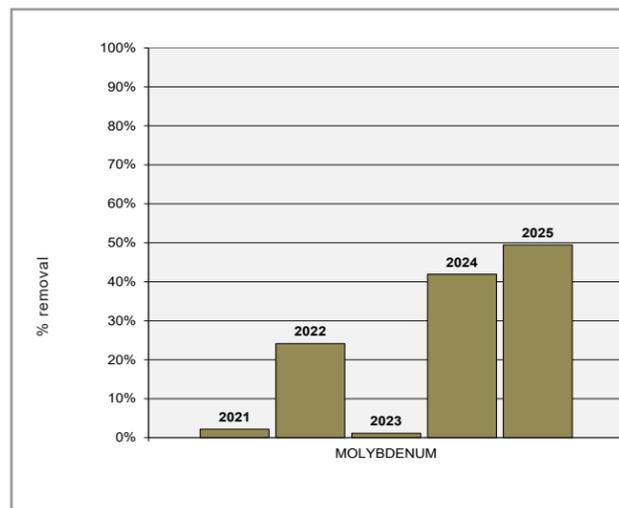
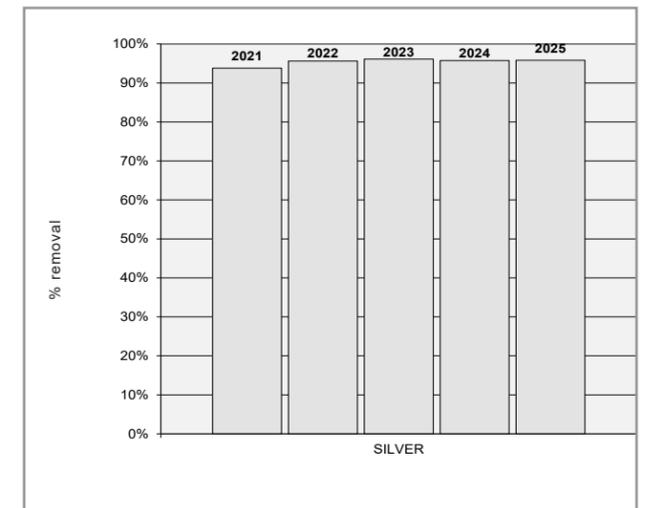
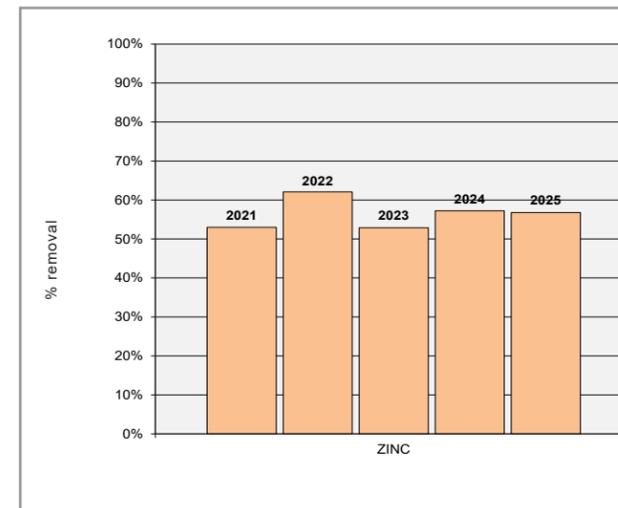
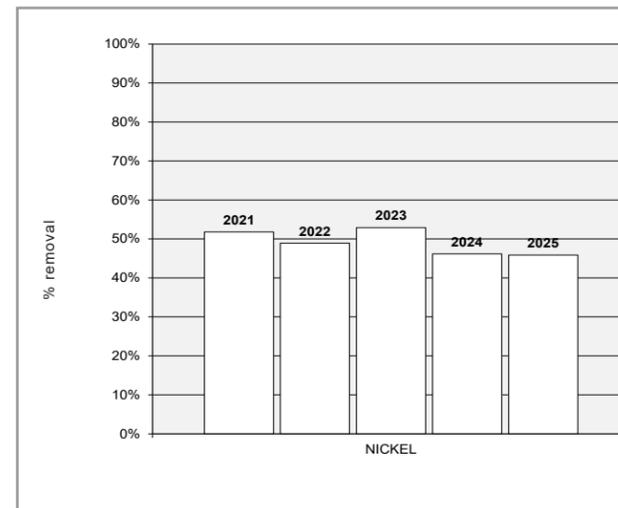
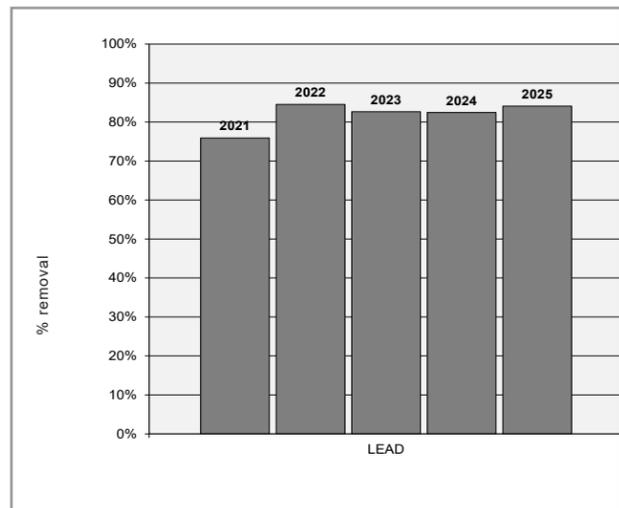
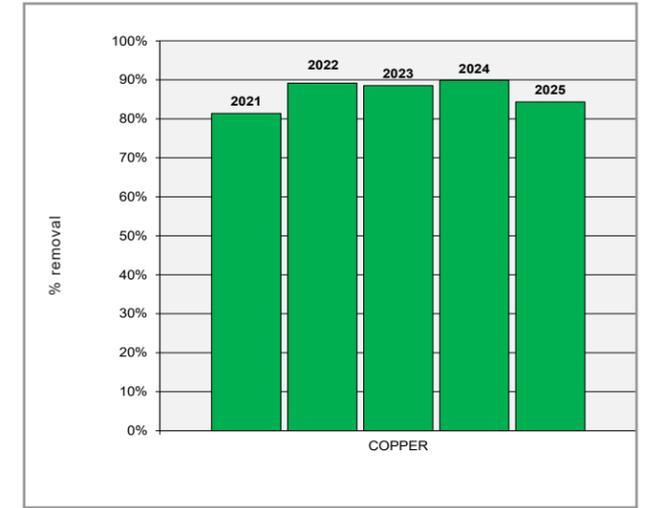
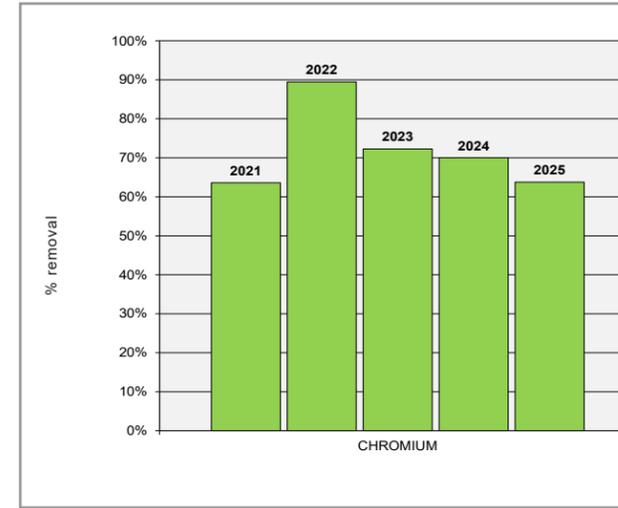
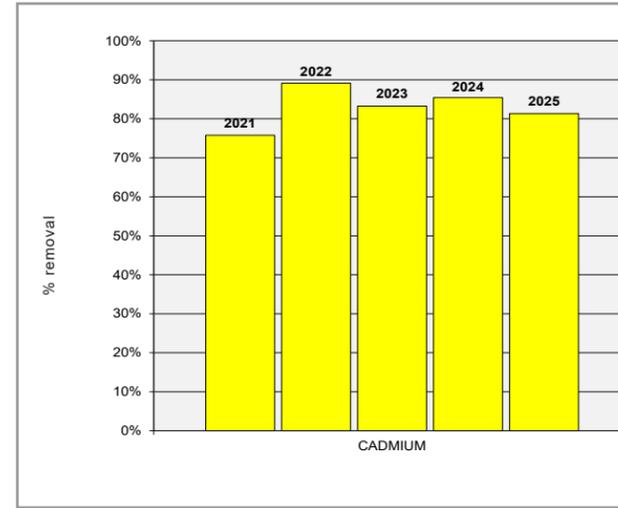
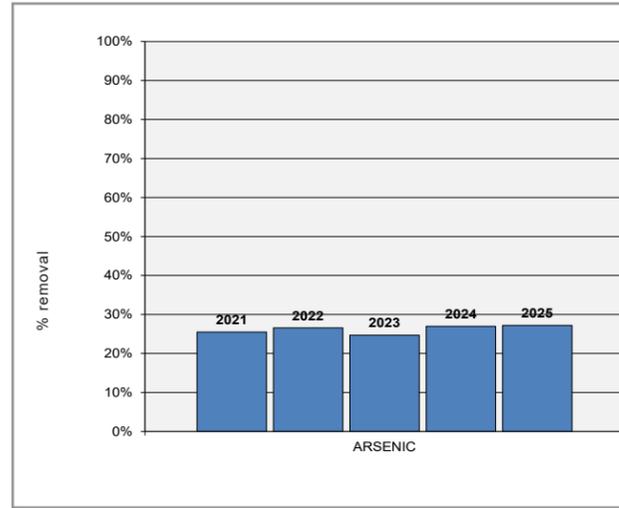
# BUDD INLET TREATMENT PLANT

## BIOSOLIDS METALS LOADING TRENDS 2021–2025

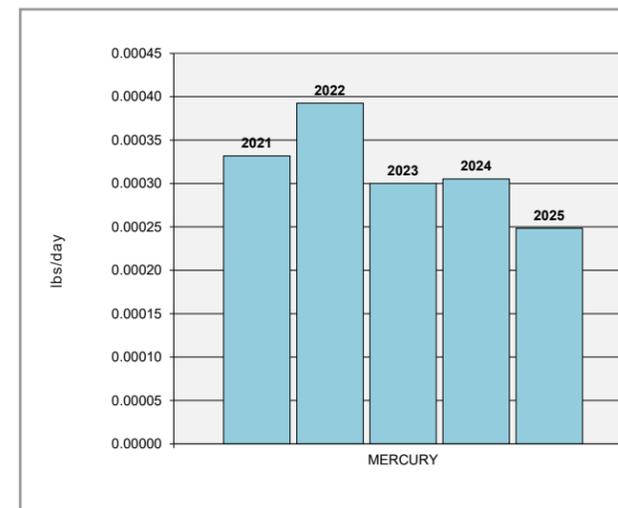
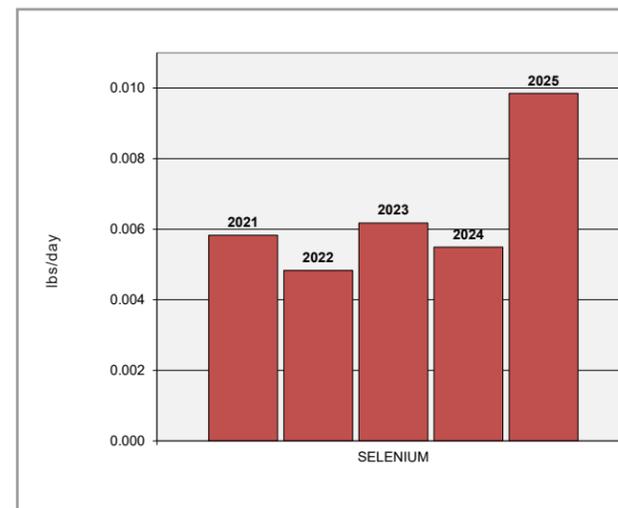
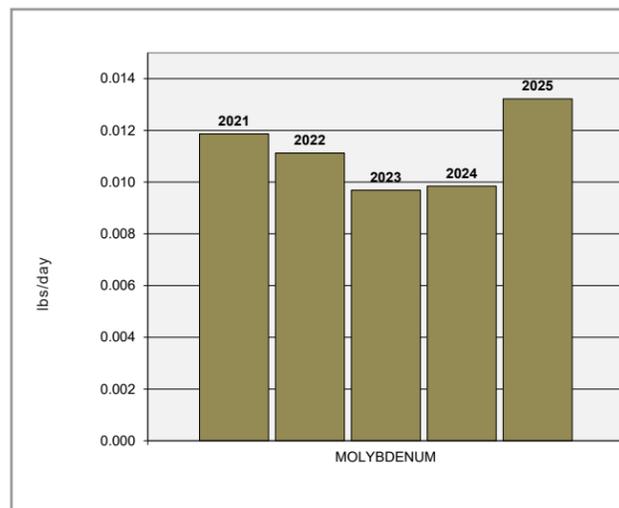
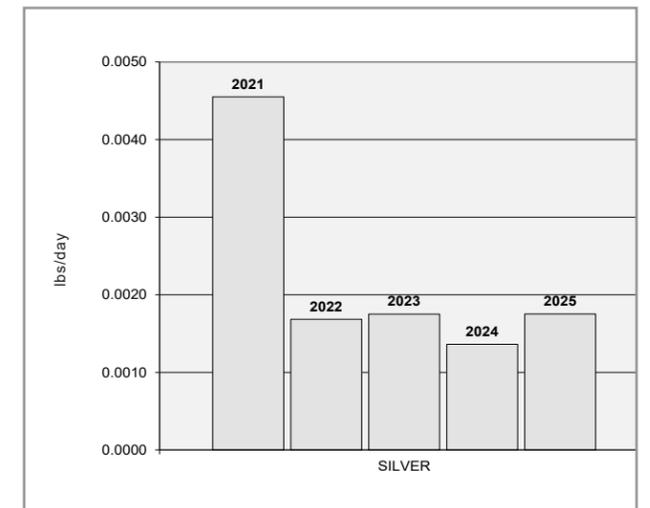
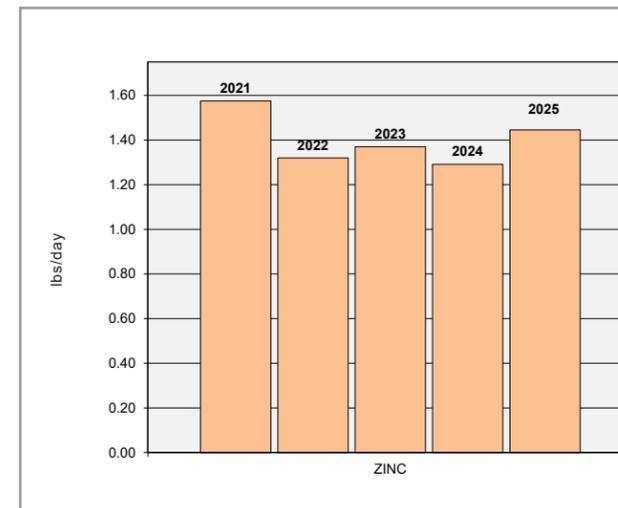
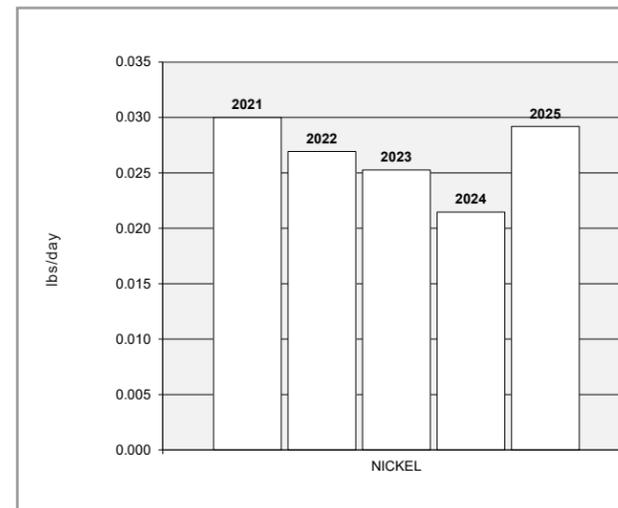
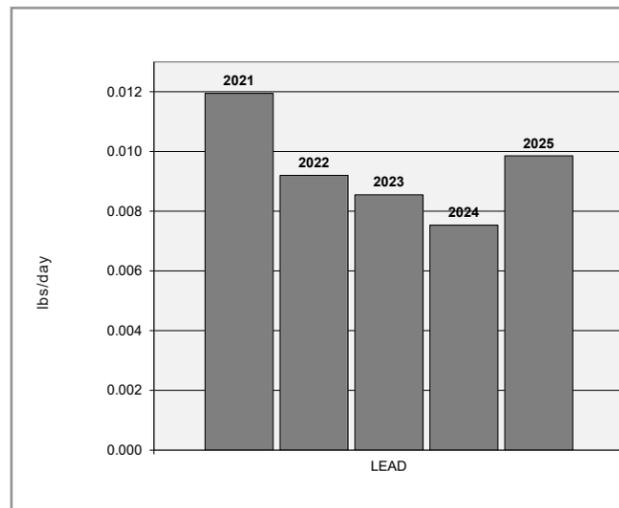
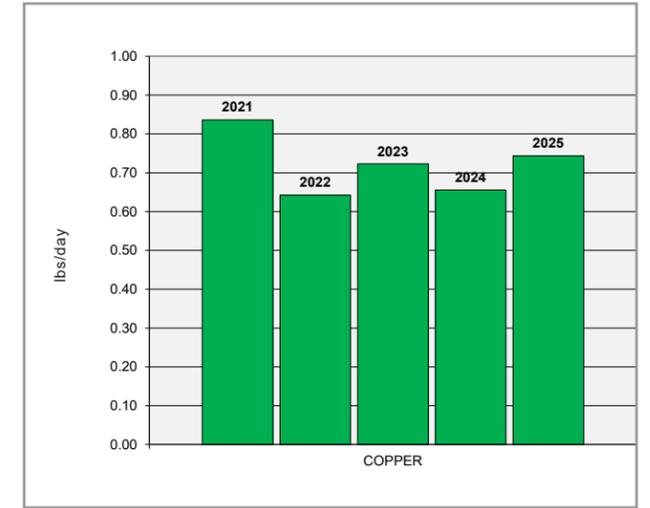
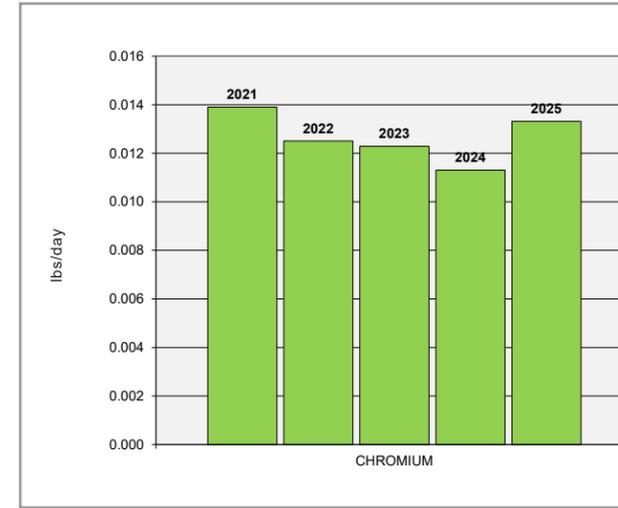
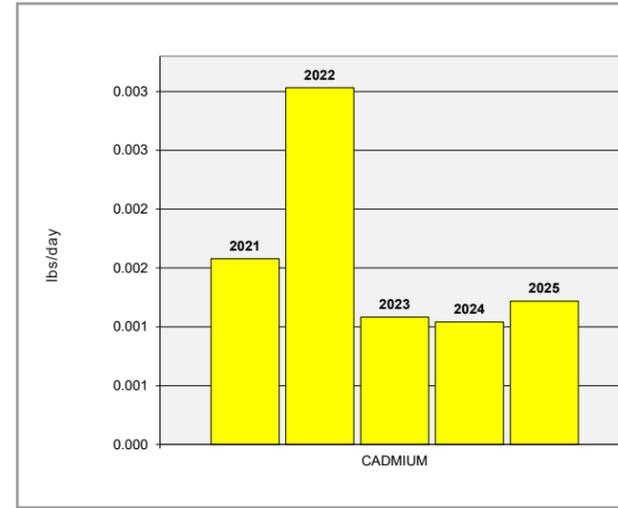
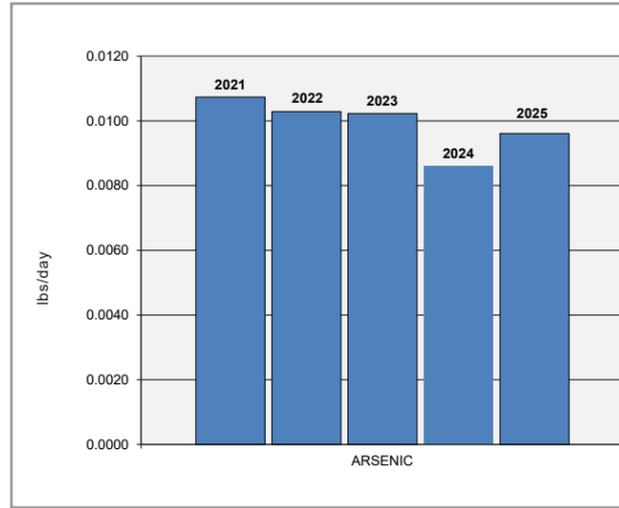


# BUDD INLET TREATMENT PLANT

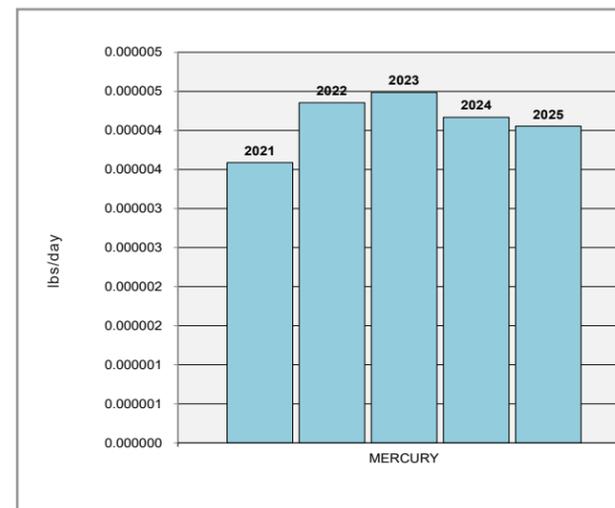
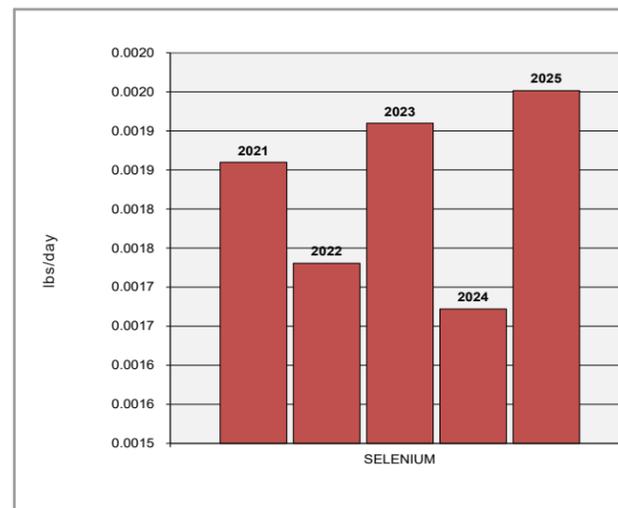
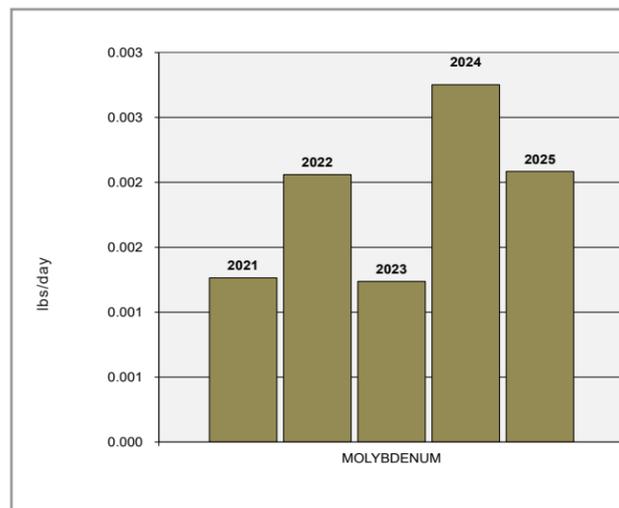
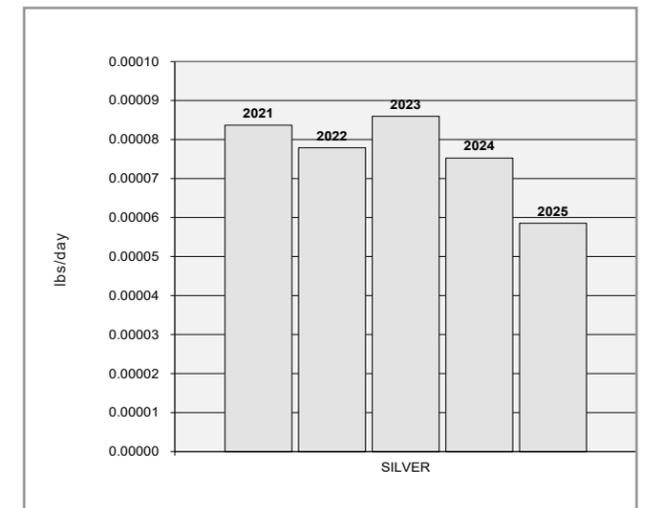
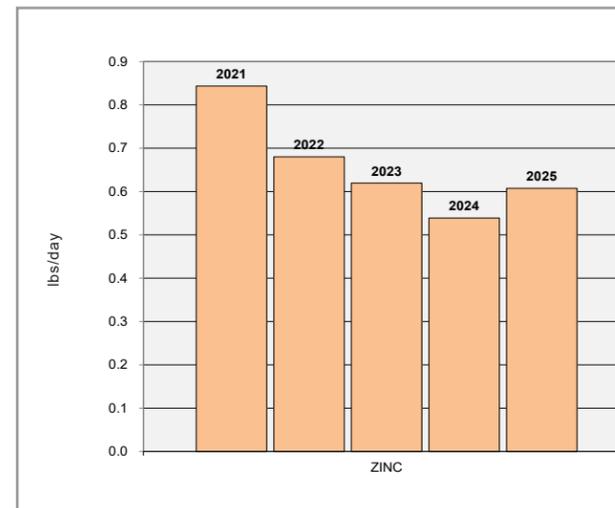
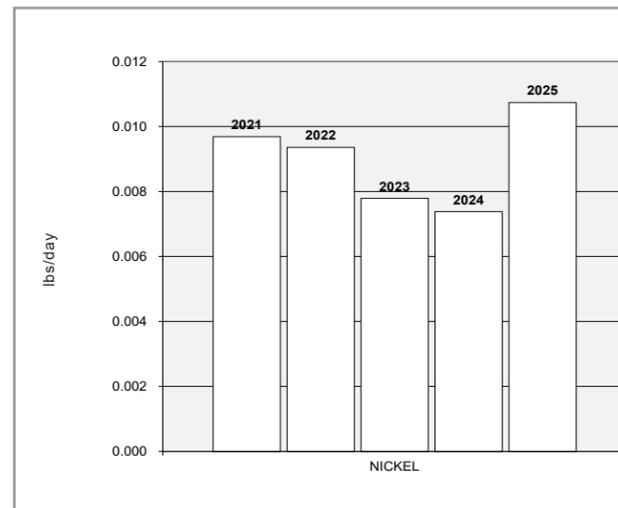
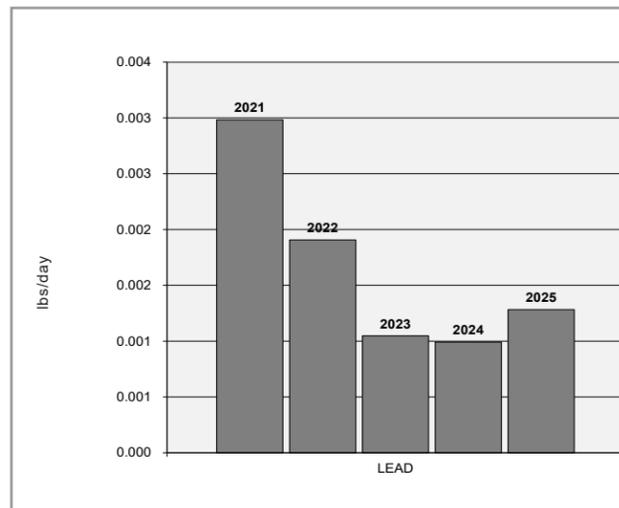
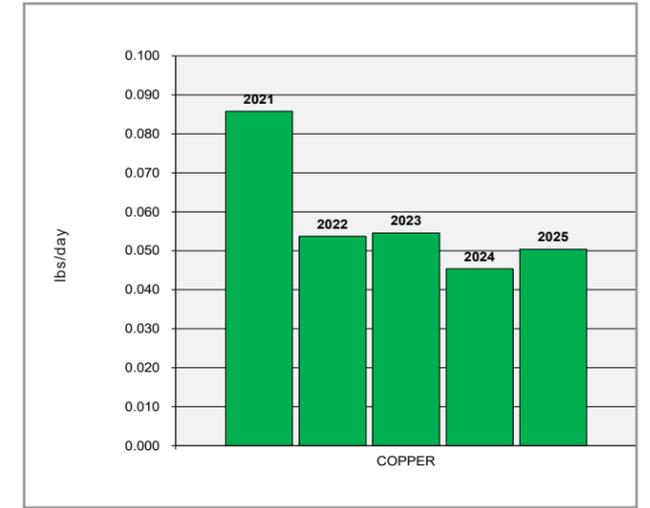
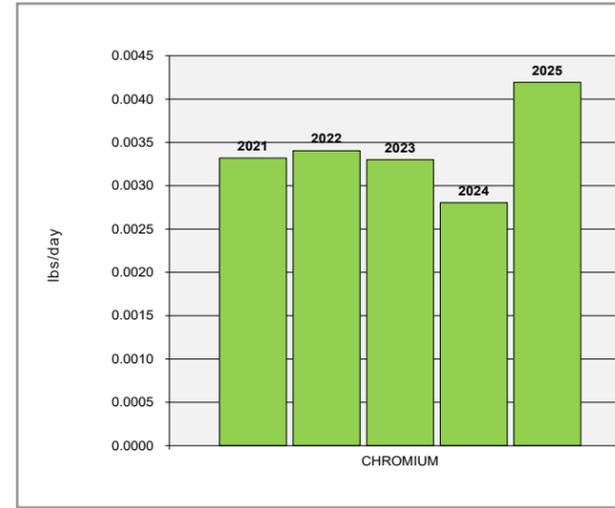
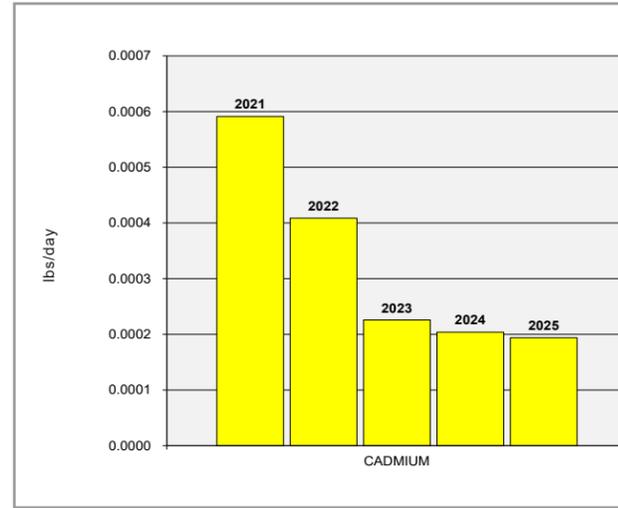
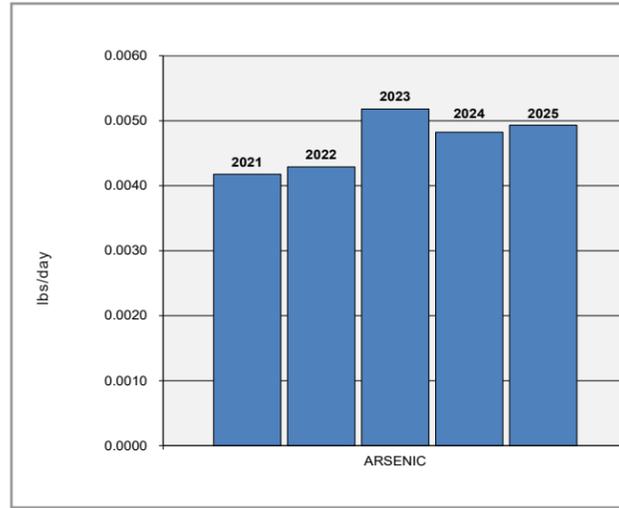
## REMOVAL EFFICIENCY TRENDS 2021-2025



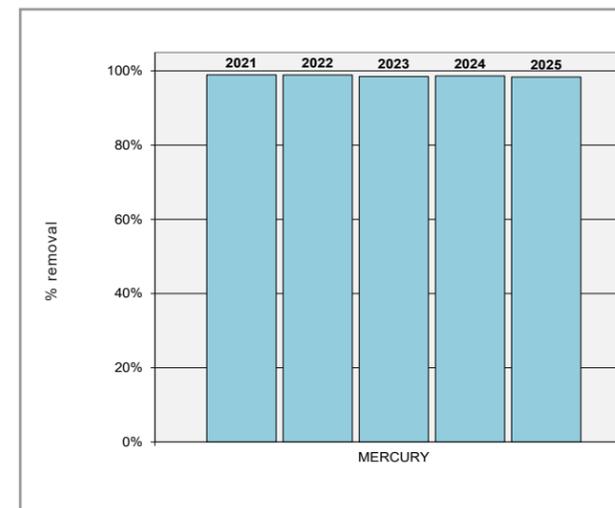
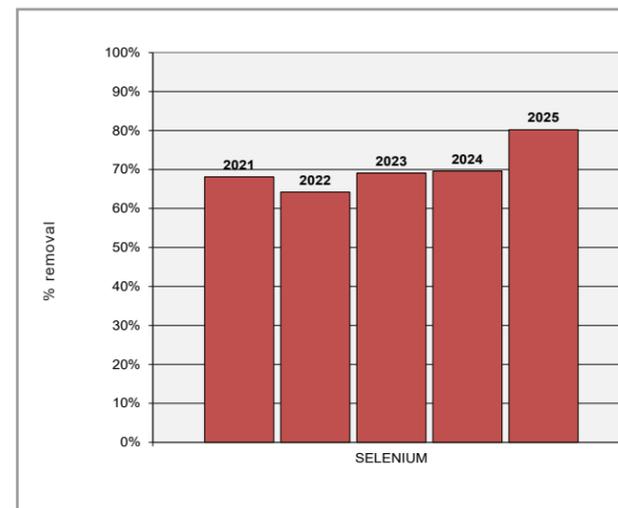
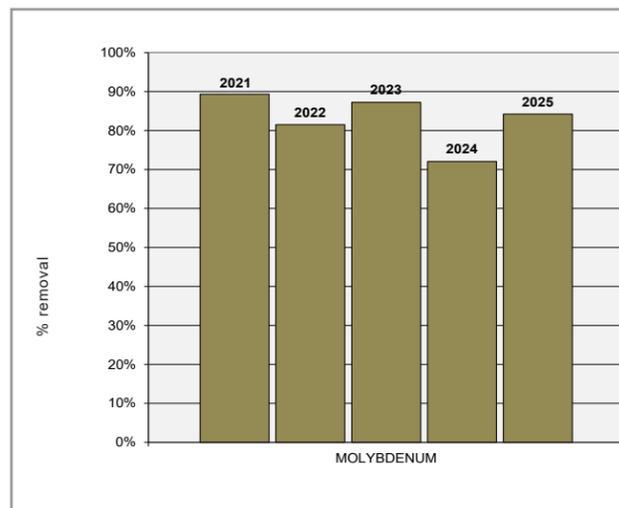
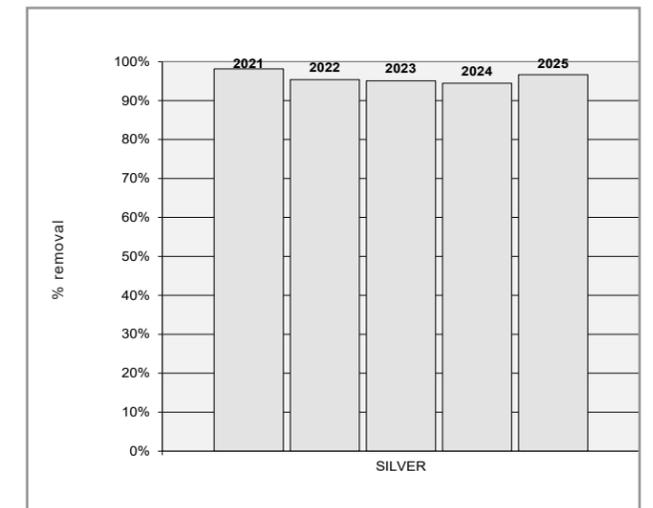
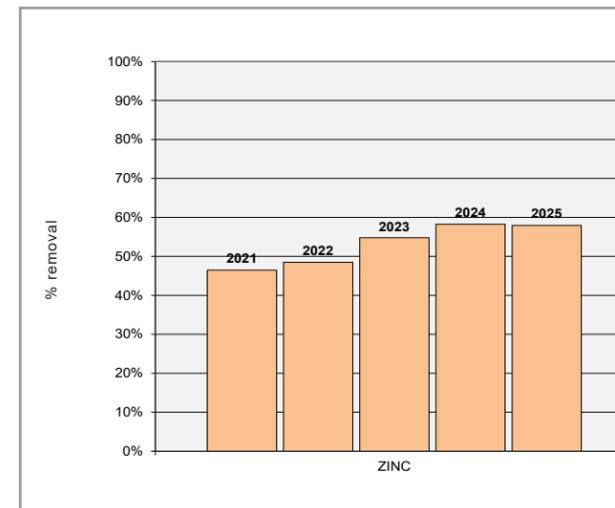
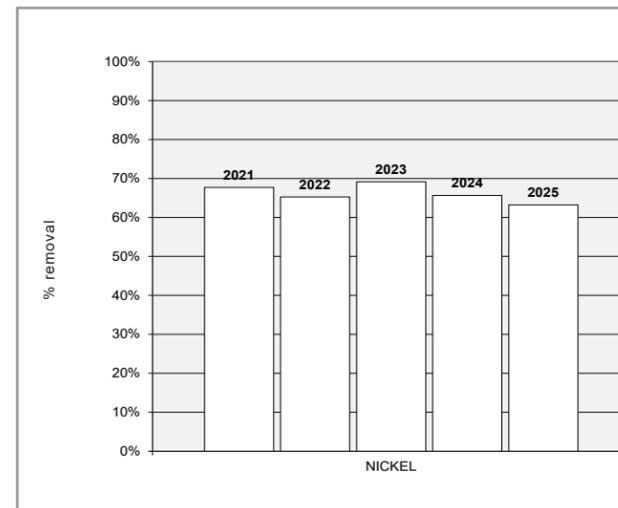
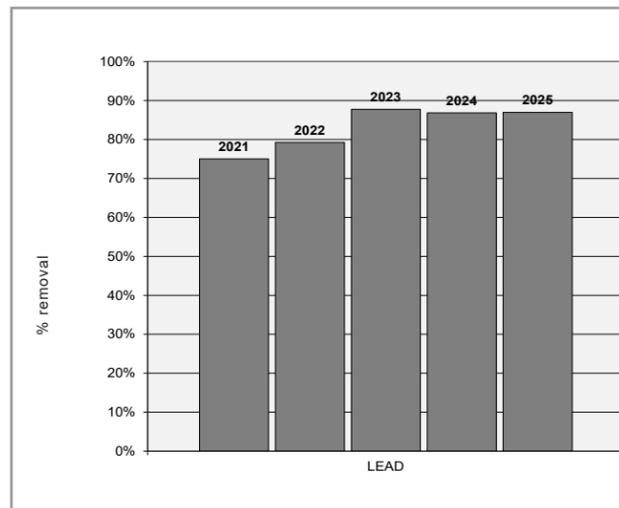
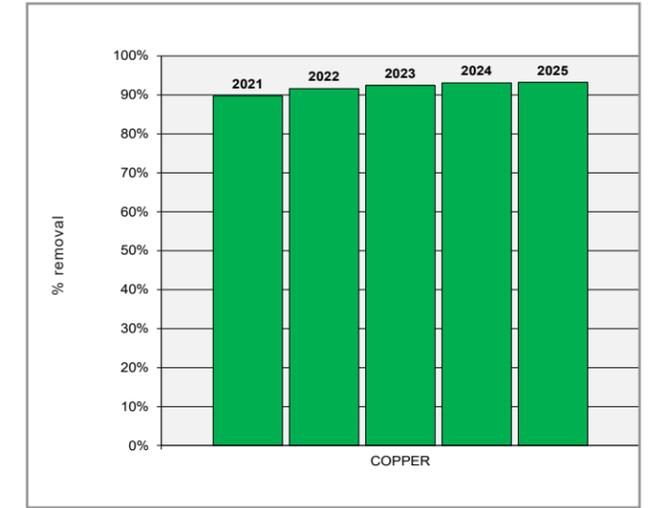
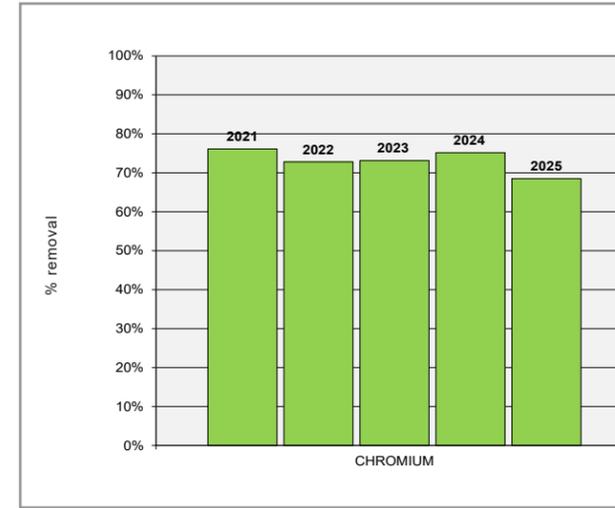
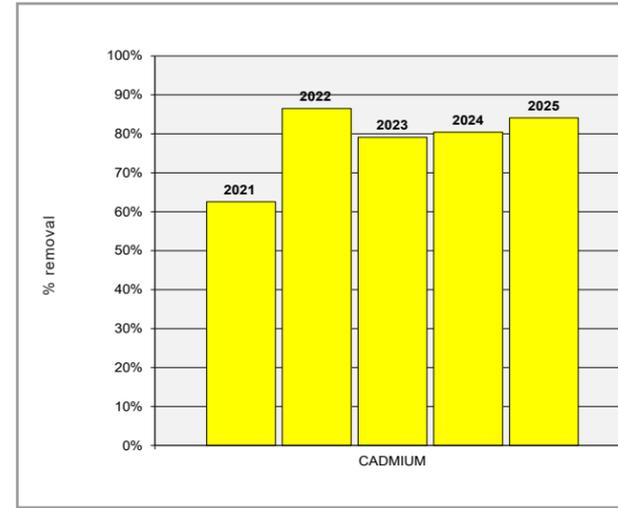
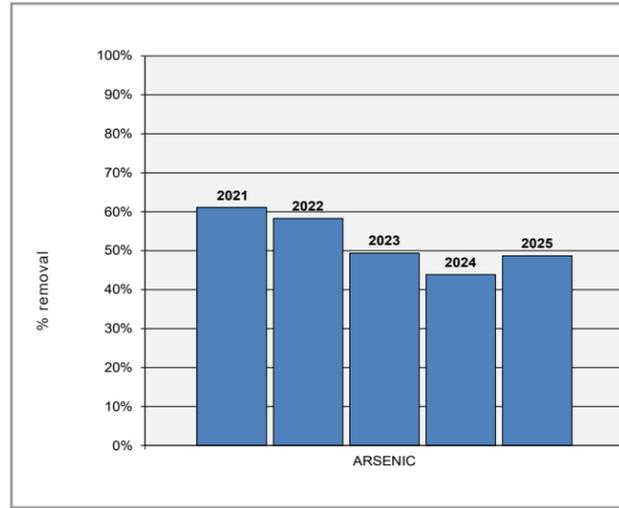
# MARTIN WAY RECLAIMED WATER PLANT INFLUENT METALS LOADING TRENDS 2021-2025



# MARTIN WAY RECLAIMED WATER PLANT FINAL EFFLUENT METALS LOADING TRENDS 2021–2025



# MARTIN WAY RECLAIMED WATER PLANT REMOVAL EFFICIENCY TRENDS 2021-2025



**BUDD INLET TREATMENT PLANT**  
**PLANT INFLUENT - PRIMARY EFFLUENT - FINAL EFFLUENT**  
**2025**  
**POLLUTANT ANALYSIS FOR METALS, OIL AND GREASE, PHENOLICS, AND CYANIDE**

**POLLUTANT ANALYSES FOR PLANT INFLUENT**

MONTH	AVE. FLOW MGD	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Copper		Lead		Mercury		Molybdenum		Nickel		Selenium		Silver		Thallium		Zinc		Oil and Grease		Phenolics		Cyanide	
		µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	ng/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day
JAN	12.3	0.633	0.065	1.66	0.170	0.006 J	0.0006	0.148	0.015	1.82	0.187	55.5	5.69	1.61	0.17	17.4	0.0018	1.84	0.189	2.99	0.307	0.7 J	0.07 J	0.269	0.028	0.009 U	0.0009 J	141	14.5						
FEB	14.1	0.540	0.064	1.44	0.169	0.008 U	0.0009	0.200	0.024	1.38	0.162	45.0	5.30	1.78	0.21	21.3	0.0025	2.18	0.257	2.95	0.347	0.4 J	0.05 J	0.430	0.051	0.009 U	0.0011 J	113	13.3	20.1	2.37	0.075	0.01	0.0005 U	0.00006 J
MAR	15.5	0.542	0.070	1.69	0.219	0.008 U	0.0010	0.099	0.013	1.44	0.186	47.8	6.18	0.88	0.11	16.0	0.0021	1.84	0.238	2.34	0.303	0.5 J	0.06 J	0.225	0.029	0.036	0.0047	109	14.1						
APR	12.9	0.504	0.054	1.28	0.138	0.008 U	0.0009	0.088	0.009	1.24	0.133	36.3	3.90	1.04	0.11	24.8	0.0027	4.05	0.435	2.38	0.256	0.4 J	0.04 J	0.221	0.024	0.009 J	0.0010 J	97.9	10.5						
MAY	10.8	0.695	0.063	1.88	0.169	0.008 U	0.0007	0.151	0.014	1.63	0.147	50.8	4.57	1.86	0.17	20.1	0.0018	2.81	0.253	2.93	0.264	0.8 J	0.07 J	0.273	0.025	0.009 U	0.0008 J	134	12.1	31.4	2.83	0.085	0.01	0.0005 U	0.00004 J
JUN	9.71	0.601	0.049	1.73	0.140	0.008 U	0.0006	0.124	0.010	1.34	0.109	46.1	3.73	1.58	0.13	60.3	0.0049	4.81	0.390	2.96	0.240	0.7 J	0.06 J	0.378	0.031	0.009 U	0.0007 J	139	11.3						
JUL	9.46	0.743	0.059	1.90	0.150	0.009 J	0.0007	0.133	0.010	1.78	0.140	50.3	3.97	2.11	0.17	28.6	0.0023	3.68	0.290	3.42	0.270	0.7 J	0.06 J	0.328	0.026	0.009 U	0.0007 J	154	12.2						
AUG	9.53	0.800	0.064	1.98	0.157	0.008 U	0.0006	0.160	0.013	1.68	0.134	60.2	4.78	1.84	0.15	30.5	0.0024	1.97	0.157	3.41	0.271	0.7 J	0.06 J	0.360	0.029	0.009 U	0.0007 J	166	13.2	23.0	1.83	0.103	0.01	0.0009 J	0.00007 J
SEP	9.84	0.667	0.055	1.89	0.155	0.008 U	0.0007	0.129	0.011	1.50	0.123	58.7	4.82	1.72	0.14	32.8	0.0027	1.94	0.159	3.54	0.291	0.6 J	0.05 J	0.363	0.030	0.009 U	0.0007 J	150	12.3						
OCT	10.1	0.589	0.049	2.10	0.176	0.008 U	0.0007	0.126	0.011	1.50	0.126	58.8	4.93	2.08	0.17	37.8	0.0032	5.21	0.437	3.41	0.286	0.6 J	0.05 J	0.330	0.028	0.009 U	0.0008 J	137	11.5	32.6	2.73	0.082	0.01	0.0005 U	0.00004 J
NOV	12.6	0.848	0.089	1.33	0.140	0.008 U	0.0008	0.095	0.010	1.40	0.148	36.9	3.89	1.85	0.20	22.6	0.0024	2.26	0.238	2.79	0.294	0.5 J	0.05 J	0.266	0.028	0.012 J	0.0013 J	111	11.7						
DEC	17.1	0.441	0.063	1.08	0.154	0.008 U	0.0011	0.066	0.009	0.98	0.140	26.4	3.77	0.99	0.14	29.2	0.0042	2.68	0.383	1.88	0.268	0.4 J	0.06 J	0.131	0.019	0.017 J	0.0024 J	71.0	10.1						
MAX	17.1	0.848	0.089	2.10	0.219	0.009 J	0.0011	0.200	0.024	1.82	0.187	60.2	6.18	2.11	0.21	60.3	0.0049	5.21	0.437	3.54	0.347	0.8 J	0.07 J	0.430	0.051	0.036	0.0047	166	14.5	32.6	2.83	0.10	0.01	0.0009 J	0.00007 J
MIN	9.46	0.441	0.049	1.08	0.138	0.006 J	0.0006	0.066	0.009	0.98	0.109	26.4	3.73	0.88	0.11	16.0	0.0018	1.84	0.157	1.88	0.240	0.4 J	0.04 J	0.131	0.019	0.009	0.0007 J	71.0	10.1	20.1	1.83	0.08	0.01	0.0005 U	0.00004 J
AVE	12.0	0.634	0.062	1.66	0.162	0.008 J	0.00079	0.127	0.012	1.47	0.145	47.7	4.63	1.61	0.15	28.5	0.0027	2.94	0.285	2.92	0.283	0.6 J	0.06 J	0.298	0.029	0.012 J	0.0013 J	127	12.2	26.8	2.44	0.09	0.01	0.0006 J	0.00005 J

**POLLUTANT ANALYSES FOR PRIMARY EFFLUENT**

MONTH	AVE. FLOW MGD	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Copper		Lead		Mercury		Molybdenum		Nickel		Selenium		Silver		Thallium		Zinc							
		µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	ng/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day						
JAN	12.3	0.472	0.048	1.71	0.175	0.005 U	0.0005 J	0.083	0.0085	1.32	0.135	33.5	3.44	0.651	0.067	17.2	0.0018	2.42	0.248	2.55	0.262	0.4 J	0.04 J	0.135	0.014	0.009 U	0.001 J	82.2	8.43						
FEB	14.1	0.472	0.056	1.54	0.181	0.008 U	0.0009 J	0.063	0.0074	0.82	0.096	28.3	3.33	0.549	0.065	56.8	0.0067	1.41	0.166	2.21	0.260	0.4 J	0.05 J	0.112	0.013	0.009 U	0.001 J	74.2	8.73						
MAR	15.5	0.442	0.057	1.45	0.188	0.008 U	0.0010 J	0.065	0.0084	0.81	0.105	31.3	4.05	0.554	0.072	11.9	0.0015	1.49	0.193	2.25	0.291	0.3 J	0.04 J	0.104	0.013	0.009 U	0.001 J	79.8	10.3						
APR	12.9	0.490	0.053	1.28	0.138	0.008 U	0.0009 J	0.063	0.0068	0.86	0.092	27.6	2.97	0.629	0.068	25.7	0.0028	2.13	0.229	1.94	0.209	0.3 J	0.03 J	0.102	0.011	0.009 U	0.001 J	69.9	7.51						
MAY	10.8	0.522	0.047	1.56	0.140	0.008 U	0.0007 J	0.084	0.0076	1.35	0.121	38.1	3.43	0.837	0.075	16.0	0.0014	4.08	0.367	2.63	0.237	0.5 J	0.04 J	0.116	0.010	0.009 U	0.001 J	92.0	8.28						
JUN	9.71	0.566	0.046	1.63	0.132	0.008 U	0.0006 J	0.076	0.0062	1.19	0.096	31.8	2.58	0.770	0.062	13.0	0.0011	2.35	0.190	2.58	0.209	0.4 J	0.03 J	0.158	0.013	0.009 U	0.001 J	87.1	7.05						
JUL	9.46	0.548	0.043	1.68	0.133	0.008 U	0.0006 J	0.086	0.0068	1.51	0.119	36.0	2.84	0.917	0.072	19.0	0.0015	3.63	0.286	2.86	0.226	0.4 J	0.03 J	0.136	0.011	0.009 U	0.001 J	104	8.21						
AUG	9.53	0.65	0.052	1.99	0.158	0.008 U	0.0006 J	0.132	0.0105	1.72	0.137	41.9	3.33	0.990	0.079	16.6	0.0013	2.26	0.180	3.17	0.252	0.5 J	0.04 J	0.412	0.033	0.009 U	0.001 J	124	9.86						
SEP	9.84	0.568	0.047	1.71	0.140	0.008 U	0.0007 J	0.064	0.0053	0.88	0.072	30.7	2.52	0.632	0.052	10.3	0.0008	1.59	0.130	2.65	0.217	0.4 J	0.03 J	0.107	0.009	0.009 U	0.001 J	82.6	6.78						
OCT	10.1	0.531	0.045	1.54	0.129	0.008 U	0.0007 J	0.070	0.0059	0.94	0.079	32.5	2.72	0.748	0.063	15.6	0.0013	2.65	0.222	2.71	0.227	0.4 J	0.03 J	0.129	0.011	0.009 U	0.001 J	79.6	6.67						
NOV	12.6	0.542	0.057	1.23	0.130	0.008 U	0.0008 J	0.064	0.0067	0.96	0.101	27.3	2.88	0.989	0.104	13.1	0.0014	1.61	0.170	1.90	0.200	0.3 J	0.03 J	0.134	0.014	0.009 U	0.001 J	76.9	8.11						
DEC	17.1	0.488	0.070	1.17	0.167	0.008 U	0.0011 J	0.051	0.0073	0.77	0.110	22.7	3.24	0.717	0.102	10.1	0.0014	3.39	0.484	1.59	0.227	0.3 J	0.04 J	0.114	0.016	0.009 U	0.001 J	56.1	8.01						
MAX	17.12	0.650	0.070	1.99	0.188	0.008 U	0.0011 J	0.132	0.0105	1.72	0.137	41.9	4.05	0.99	0.104	56.8	0.0067	4.08	0.484	3.17	0.291	0.5 J	0.05 J	0.41	0.033	0.01 U	0.001 J	124	10.3						
MIN	9.46	0.442	0.043	1.17	0.129	0.005 U	0.0005 J	0.051	0.0053	0.77	0.072	22.7	2.52	0.55	0.052	10.1	0.0008	1.41	0.130	1.59	0.200	0.3 J	0.03 J	0.10	0.009	0.01 U	0.001 J	56.1	6.67						
AVE	12.00	0.524	0.052	1.54	0.151	0.008 J	0.0008 J	0.075	0.0073	1.09	0.105	31.8	3.11	0.75	0.073	18.8	0.0019	2.42	0.239	2.42	0.235	0.4 J	0.04 J	0.15	0.014	0.009 J	0.001 J	84.0	8.16						

**POLLUTANT ANALYSES FOR FINAL EFFLUENT**

MONTH	AVE. FLOW MGD	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Copper		Lead		Mercury		Molybdenum		Nickel		Selenium		Silver		Thallium		Zinc		Oil and Grease		Phenolics		Cyanide	
		µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	ng/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	µg/L	lbs/day
JAN	12.3	0.362	0.037	1.20	0.123	0.005 U	0.0005 J	0.026	0.003	0.58	0.06	8.91	0.91	0.257	0.03	1.91	0.0002	1.10	0.11	1.52	0.16	0.2 U	0.02	0.009 U	0.001 J	0.009 U	0.001 J	52.1	5.34						
FEB	14.1	0.301	0.035	1.14	0.134	0.008 U	0.0009 J	0.023	0.003	0.45	0.05	6.77	0.80	0.303	0.04	1.71	0.0002	0.76	0.09	1.67	0.20	0.2 U	0.02	0.011 J	0.001 J	0.009 U	0.001 J	60.5	7.12	2.3 J	0.3 J	0.0			

**BUDD INLET TREATMENT PLANT  
PRIMARY EFFLUENT AND FINAL EFFLUENT REMOVAL EFFICIENCIES  
2025**

Unless otherwise noted, for purposes of determining removal efficiencies, detection limit values are used for non-detect results.

**Primary Effluent Removal Efficiency**

ANALYTE		Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Zinc
MONTH	AVE. FLOW MGD	%	%	%	%	%	%	%	%	%	%	%	%	%	%
JAN	12.3	25.4	-3.01	16.7	43.9	27.5	39.6	59.6	1.15	-31.5	14.7	42.9	1.37	0.00	41.7
FEB	14.1	12.6	-6.94	0.00	68.5	40.6	37.1	69.2	-167	35.3	25.1	0.00	3.74	0.00	34.3
MAR	15.5	18.5	14.2	0.00	34.3	43.8	34.5	36.8	25.6	19.0	3.85	40.0	1.57	75.0	26.8
APR	12.9	2.78	0.00	0.00	28.4	30.6	24.0	39.5	-3.63	47.4	18.5	25.0	1.28	0.00	28.6
MAY	10.8	24.9	17.0	0.00	44.4	17.2	25.0	55.0	20.4	-45.2	10.2	37.5	1.41	0.00	31.3
JUN	9.71	5.82	5.78	0.00	38.7	11.2	31.0	51.3	78.4	51.1	12.8	42.9	1.78	0.00	37.3
JUL	9.46	26.2	11.6	11.1	35.3	15.2	28.4	56.5	33.6	1.36	16.4	42.9	1.51	0.00	32.5
AUG	9.53	18.8	-0.51	0.00	17.5	-2.4	30.4	46.2	45.6	-14.7	7.04	28.6	-0.41	0.00	25.3
SEP	9.84	14.8	9.52	0.00	50.4	41.3	47.7	63.3	68.6	18.0	25.1	33.3	2.10	0.00	44.9
OCT	10.1	9.85	26.7	0.00	44.4	37.3	44.7	64.0	58.7	49.1	20.5	33.3	1.68	0.00	41.9
NOV	12.6	36.1	7.52	0.00	32.6	31.4	26.0	46.5	42.0	28.8	31.9	40.0	1.39	25.0	30.7
DEC	17.1	-10.7	-8.33	0.00	22.7	21.4	14.0	27.4	65.4	-26.5	15.4	25.0	0.24	47.1	21.0
MAX	17.1	36.1	26.7	16.7	68.5	43.8	47.7	69.2	78.4	51.1	31.9	42.9	3.74	75.0	44.9
MIN	9.46	-10.66	-8.33	0.00	17.5	-2.4	14.0	27.4	-167	-45.2	3.85	0.00	-0.41	0.0	21.0
AVE	12.0	15.4	6.12	2.3	38.4	26.3	31.9	51.3	22.4	11.0	16.8	32.6	1.47	12.3	33.0

**Final Effluent Removal Efficiency**

ANALYTE		Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Zinc	Oil and Grease	Phenolics	Cyanide
MONTH	AVE. FLOW MGD	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	
JAN	12.3	42.8	27.71	16.7	82.4	68.1	83.9	84.0	89.0	40.2	49.2	71.4	96.7	0.00	63.0			
FEB	14.1	44.3	20.83	0.00	88.5	67.4	85.0	83.0	92.0	65.1	43.4	50.0	97.4	0.00	46.5	88.6	74.7	0.00
MAR	15.5	14.8	39.64	0.00	82.8	72.2	87.7	78.2	92.9	50.0	47.0	60.0	95.6	75.0	52.0			
APR	12.9	26.8	24.22	0.00	80.7	66.9	83.8	78.7	94.4	72.6	52.9	50.0	94.6	-77.8	54.5			
MAY	10.8	48.3	32.45	0.00	85.4	57.1	85.6	84.9	94.1	37.0	49.5	75.0	94.5	0.00	60.9	91.4	99.7	100
JUN	9.71	50.2	32.37	0.00	64.5	67.2	84.9	79.1	97.8	71.1	48.0	71.4	97.1	0.00	55.2			
JUL	9.46	62.2	26.32	11.1	82.0	71.3	87.6	86.9	95.8	57.9	52.3	71.4	95.4	0.00	60.1			
AUG	9.53	52.5	25.25	0.00	76.3	47.6	87.8	77.4	96.1	-47.7	40.2	71.4	97.5	0.00	54.5	88.3	99.6	100
SEP	9.84	34.9	23.28	0.00	79.1	47.3	84.3	86.9	94.5	56.7	41.8	66.7	96.1	0.00	64.5			
OCT	10.1	35.5	36.19	0.00	76.2	69.3	83.4	88.7	94.7	68.9	32.3	66.7	94.5	0.00	60.3	94.5	99.8	100
NOV	12.6	54.5	11.28	0.00	82.1	69.3	79.3	90.9	94.6	49.6	46.2	60.0	96.6	25.0	55.4			
DEC	17.1	22.2	19.44	0.00	86.4	55.1	75.5	84.0	94.5	11.2	49.5	50.0	90.1	47.1	54.4			
MAX	17.1	62.2	39.64	16.7	88.5	72.2	87.8	90.9	97.8	72.6	52.9	75.0	97.5	75.0	64.5	94.5	99.8	100
MIN	9.46	14.8	11.28	0.00	64.5	47.3	75.5	77.4	89.0	-47.7	32.3	50.0	90.1	-77.8	46.5	88.3	74.7	0.00
AVE	12.0	40.8	26.58	2.3	80.5	63.2	84.1	83.6	94.2	44.4	46.0	63.7	95.5	5.8	56.8	90.7	93.4	75

MARTIN WAY RECLAIMED WATER PLANT  
PLANT INFLUENT AND CLASS A WATER  
2025

POLLUTANT ANALYSES FOR METALS, OIL AND GREASE, PHENOLICS, CYANIDE, TDS, CHLORIDE, SULFATE, HYDRAZINE, TOC AND PHOSPHORUS

Unless otherwise noted, for purposes of determining removal efficiencies, detection limit values are used for non-detect results.

			PI – Primary Influent		CLA – Class A Water		RE – Removal Efficiency																								
ANALYTE			Antimony		Arsenic		Beryllium		Cadmium		Chromium		Copper		Iron		Lead		Manganese		Mercury		Molybdenum		Nickel		Selenium		Silver		
DATE	PI AVE. FLOW (MGD)	CLA AVE. FLOW (MGD)	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	ng/L	lbs/day	µg/L	lbs/day	ug/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	
02/06/25	1.26	1.02	PI	0.609	0.0052	0.79	0.0067	0.008 U	0.00008 J	0.088	0.00092	1.12	0.0118	58.0	0.609	289	3.04	0.620	0.0065	44.1	0.463	17.3	0.000182	0.95	0.0100	2.37	0.0249	0.5 J	0.005 J	0.126	0.00132
			CLA	0.417	0.0035	0.39 J	0.0033 J	0.008 U	0.00007 J	0.011 J	0.00009 J	0.35	0.0030	3.55	0.030	14.5	0.12	0.113	0.0010	36.7	0.312	0.33	0.000003	0.12	0.0010	1.07	0.0091	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	0.32		0.51		0.00		0.88		0.69		0.94		0.95		0.82		0.17		0.98		0.87		0.55		0.60		0.95	
05/08/25	1.42	1.13	PI	0.697	0.0083	0.80	0.0095	0.008 U	0.00009 J	0.115	0.00136	1.29	0.0153	79.0	0.936	308	3.65	0.878	0.0104	52.4	0.621	14.4	0.000171	1.42	0.0168	2.65	0.0314	1.7	0.020 J	0.187	0.00221
			CLA	0.521	0.0049	0.40 J	0.0038 J	0.008 U	0.00008 J	0.022	0.00021	0.67	0.0063	4.28	0.040	20.1	0.19	0.183	0.0017	37.6	0.354	0.37 J	0.0000035 J	0.12	0.0011	1.15	0.0108	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	0.25		0.50		0.00		0.81		0.48		0.95		0.93		0.79		0.28		0.97		0.92		0.57		0.88		0.97	
08/08/25	1.50	1.25	PI	0.64	0.0080	1.01	0.0126	0.008 U	0.00010 J	0.111	0.00139	1.18	0.0148	63.2	0.791	506	6.33	1.09	0.0136	102	1.28	21.0	0.000263	1.20	0.0150	2.45	0.0306	0.6 J	0.01 J	0.169	0.00211
			CLA	0.55	0.0057	0.68	0.0071	0.008 U	0.00008 J	0.026	0.00027	0.39	0.0041	7.21	0.075	19.0	0.20	0.126	0.0013	25.0	0.261	0.46 J	0.0000048 J	0.46	0.0048	1.08	0.0113	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	0.14		0.33		0.00		0.77		0.67		0.89		0.96		0.88		0.75		0.98		0.62		0.56		0.67		0.96	
10/10/25	1.56	1.28	PI	0.522	0.0068	0.74	0.0096	0.008 U	0.00010 J	0.092	0.00120	0.88	0.0114	49.1	0.639	264	3.43	0.681	0.0089	42.3	0.550	29.1	0.000379	0.85	0.0111	2.29	0.0298	0.5 J	0.01 J	0.104	0.00135
			CLA	0.551	0.0059	0.52	0.0056	0.008 U	0.00009 J	0.019 J	0.0002 J	0.32	0.0034	5.23	0.056	16.1	0.172	0.106	0.0011	28.2	0.301	0.48 J	0.0000051 J	0.13	0.0014	1.10	0.01174	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	-0.06		0.30		0.00		0.79		0.64		0.89		0.94		0.84		0.33		0.98		0.85		0.52		0.60		0.94	
MIN	1.26	1.02	PI	0.52	0.0052	0.74	0.0067	0.008 U	0.00008 J	0.088	0.00092	0.88	0.0114	49.1	0.609	264	3.04	0.620	0.0065	42.3	0.463	14.4	0.000171	0.85	0.0100	2.29	0.0249	0.5 J	0.005 J	0.104	0.00132
			CLA	0.42	0.0035	0.39	0.0033	0.008 U	0.00007 J	0.011	0.00009 J	0.32	0.0030	3.55	0.030	14.5	0.12	0.106	0.0010	25.0	0.261	0.33	0.000003	0.12	0.0010	1.07	0.0091	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	-0.06		0.30		0.00		0.77		0.48		0.89		0.93		0.79		0.17		0.97		0.62		0.52		0.60		0.94	
MAX	1.56	1.28	PI	0.70	0.0083	1.01	0.0126	0.008 U	0.00010 J	0.115	0.00139	1.29	0.0153	79.0	0.936	506	6.33	1.09	0.0136	102	1.28	29.1	0.000379	1.42	0.0168	2.65	0.0314	1.7 J	0.02 J	0.187	0.00221
			CLA	0.55	0.0059	0.68	0.0071	0.008 U	0.00009 J	0.026	0.00027 J	0.67	0.0063	7.21	0.075	20.1	0.198	0.183	0.0017	37.6	0.354	0.48	0.0000051 J	0.46	0.0048	1.15	0.01174	0.2 U	0.002 J	0.006 U	0.0001 J
			RE	0.32		0.51		0.00		0.88		0.69		0.95		0.96		0.88		0.75		0.98		0.92		0.57		0.88		0.97	
AVERAGE	1.44	1.17	PI	0.62	0.0071	0.84	0.0096	0.008 J	0.00010 J	0.10	0.0012	1.12	0.0133	62.3	0.744	342	4.11	0.817	0.0099	60.2	0.728	20.5	0.00025 J	1.11	0.0132	2.44	0.0292	0.8 J	0.01 J	0.147	0.002
			CLA	0.51	0.0050	0.50 J	0.0049	0.008 J	0.00008 J	0.02	0.00019	0.43	0.0042	5.07	0.050	17.4	0.17	0.13	0.0013	31.9	0.307	0.41	0.000004 J	0.21	0.0021	1.10	0.0107	0.2 J	0.002 J	0.006 J	0.00006
			RE	16.3%		40.8%		0.0%		81.1%		61.8%		91.6%		94.7%		83.5%		38.5%		97.9%		81.3%		54.8%		68.7%		95.7%	
			Antimony		Arsenic		Beryllium		Cadmium		Chromium		Copper		Iron		Lead		Manganese		Mercury		Molybdenum		Nickel		Selenium		Silver		

ANALYTE			Thallium		Zinc		Cr6		Conductivity		TDS		Chloride		Sulfate		Hydrazine		Oil & Grease, Total		Phenolics, Total		Cyanide, Total		Orthophosphate		Phosphorus, Total		Total Organic Carbon		
DATE	PI AVE. FLOW (MGD)	CLA AVE. FLOW (MGD)	µg/L	lbs/day	µg/L	lbs/day	µg/L	lbs/day	uMHOS/cm	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	µg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day
02/06/25	1.26	1.02	PI	0.009 U	0.0001 J	113	1.19	0.27	0.0028	805	393	48.7	512	23.9	251	230	2.42	17.8	187	0.100	1.05	0.0005 U	0.005 J	4.88	51.3	6.75	70.9	116	1219		
			CLA	0.009 U	0.0001 J	59.7	0.508	0.37	0.00315	525	323	51.9	442	26.6	226	9	0.077 J	2.1 J	18 J	0.004 U	0.03	0.0005 U	0.004 J	1.22	10.4	1.35	11.5	5.30	45.1		
			RE	0.00		0.47		-0.37		0.35		0.18		-0.07		-0.11		0.96		0.88		0.96		0.00		0.75		0.80		0.95	
05/08/25	1.42	1.13	PI	0.009 U	0.0001 J	151	1.79	0.20	0.0024	831	400	47.7	565	24.4	289	21.8	0.26	28.5	338	0.124	1.47	0.001 J	0.01	5.50	65.1	7.35	87.0	148	1753		
			CLA	0.009 U	0.0001 J	75.6	0.71	0.34	0.0032	545	339	51.0	604	28.9	272	1.0 J	0.009 J	1.5 U	14	0.018 J	0.17	0.002 J	0.02	3.24	31	3.36	31.7	5.60	52.8		
			RE	0.00		0.50		-0.70		0.34		0.15		-0.07		-0.18		0.95		0.95		0.85		-1.00		0.41		0.54		0.96	
08/08/25	1.50	1.25	PI	0.009 U	0.00011	128	1.60	0.57	0.0071	814	382	45.1	564	22.3	279	7.3	0.09	24.9	311.5	0.109	1.36	0.0005 U	0.01	5.40	67.6	7.53	94.2	141	1763.9		
			CLA	0.009 U	0.0001 J	59.6	0.62	0.24 J	0.0025	543	346	51.7	647	28.4	296	0.5 J	0.01 J	2.5 J	26	0.017 J	0.18	0.0006 J	0.01	6.08	63.4	6.15	64.1	5.40	56.3		
			RE	0.00		0.53		0.58		0.33		0.09		-0.15		-0.27		0.93		0.90		0.84		-0.20		-0.13		0.18		0.96	
10/10/25	1.56	1.28	PI	0.009 U	0.0001 J	92.5	1.20	0.85	0.0111	831	369	51.4	669	18.8	245	1.5 J	0.020	25.1	327	0.071	0.92	0.0005 U	0.01	4.38	57.0	6.37	82.9	90	1170.9		
			CLA	0.009 U	0.0001 J	55.1	0.588	0.93	0.0099	532	327	56.1	599	28.9	309	0.4 U	0.004 J	5.0 U	53	0.018 J	0.19	0.0005 U	0.01	1.30	13.9	1.44	15.4	5.00	53.4		
			RE	0.00		0.40		-0.09		0.36		0.11		-0.09		-0.54		0.73		0.80		0.75		0.00		0.70		0.77		0.94	
MIN	1.26	1.02	PI	0.009 U	0.0001 J	93	1.19	0.20	0.0024	805	369	0	512	18.8	245	1.5	0.020	17.8	187.0	0.07	0.92	0.00	0.01	4.38	51.3	6.37	70.9	90.00	1170.9		
			CLA	0.009 U	0.0001 J	55.1	0.51	0.240	0.0025	525	323	0	442	26.6	226	0.4 U	0.00 J	1.5 U	14	0.00	0.03	0.00	0.00	1.22	10.4	1.35	11.5	5.00	45.1		
			RE	0.00		0.40		-0.70		0.33		0.09		-0.15		-0.54		0.73		0.80		0.75		-1.00		-0.13		0.18		0.94	
MAX	1.56	1.28	PI	0.009	0.00012	151	1.79	0.85	0.0111	831	400	0	669	24.4	289	230	2.42	28.5	338	0.12	1.47	0.00	0.								

**BIOSOLIDS PRIORITY POLLUTANTS ANALYSES SUMMARY**

**2025**

**40 CFR Part 122 Table III Metals/Cyanide/Phenol Priority Pollutants & Molybdenum**

	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.	
		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
MONTH	DRY TONS																
JAN	167.70																
FEB	128.20	2.24	0.0225	4.0 J	0.04 J	0.10 J	0.001 J	1.01	0.0101	21.3	0.214	418	4.19	14.0	0.140	0.395	0.0040
MAR	134.91																
APR	130.08	2.58	0.0224	3.5	0.030	0.09 J	0.001 J	0.91	0.0079	20.1	0.175	388	3.37	12.8	0.111	0.486	0.0042
MAY	147.21																
JUN	132.54	2.52	0.0231	4.4	0.040	0.07 J	0.001 J	0.96	0.0088	18.9	0.173	383	3.51	11.6	0.106	0.429	0.0039
JUL	150.03																
AUG	130.88	3.44	0.0312	4.9	0.044	0.06 J	0.001 J	0.97	0.0088	19.0	0.172	415	3.76	11.8	0.107	0.507	0.0046
SEP	115.88																
OCT	152.38	3.06	0.0269	4.6	0.040	0.07 J	0.001 J	0.84	0.0074	18.6	0.164	406	3.57	12.7	0.112	0.366	0.0032
NOV	159.13																
DEC	179.23	2.63	0.0292	4.7	0.052	0.09 J	0.001 J	0.87	0.0097	17.3	0.192	417	4.63	14.5	0.161	0.462	0.0051
	MIN	2.24	0.0224	3.50	0.030	0.06 J	0.001 J	0.84	0.0074	17.3	0.164	383	3.37	11.6	0.106	0.366	0.0032
	MAX	3.44	0.0312	4.90	0.052	0.10 J	0.001 J	1.01	0.0101	21.3	0.214	418	4.63	14.5	0.161	0.507	0.0051
	AVG	2.75	0.0259	4.35	0.041 J	0.08 J	0.001 J	0.93	0.0088	19.2	0.182	405	3.84	12.9	0.123	0.44	0.0042
<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>Table 3*</b>			<b>41</b>				<b>39</b>				<b>1,500</b>		<b>300</b>		<b>17</b>	

	Units	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
MONTH	DRY TONS																
JAN	167.70																
FEB	128.20	9.90	0.099	16.4	0.165	7.4 J	0.074 J	2.63	0.0264	0.07 J	0.0007 J	729	7.31	2.10	0.0211	2.20	0.0221
MAR	134.91																
APR	130.08	10.1	0.088	16.8	0.146	6.9	0.060	2.26	0.0196	0.07 J	0.0006 J	675	5.86	2.05	0.0178	2.40	0.0209
MAY	147.21																
JUN	132.54	9.50	0.087	17.1	0.157	7.3	0.067	2.46	0.0226	0.06 J	0.0006 J	692	6.35	1.93	0.0177	4.50	0.0413
JUL	150.03																
AUG	130.88	10.9	0.099	16.6	0.150	8.0	0.072	2.80	0.0254	0.07 J	0.0006 J	731	6.62	1.40	0.0127	3.30	0.0299
SEP	115.88																
OCT	152.38	8.77	0.077	16.5	0.145	7.0	0.062	2.63	0.0231	0.05 U	0.0004 J	694	6.10	1.10	0.0097	2.30	0.0199
NOV	159.13																
DEC	179.23	11.7	0.130	16.4	0.182	7.6	0.084	2.89	0.0321	0.08 J	0.0009 J	733	8.13	2.70	0.030	2.10	0.0233
	MIN	8.77	0.077	16.4	0.145	6.9	0.060	2.26	0.0196	0.05 J	0.0004 J	675	5.86	1.10	0.0097	2.10	0.0199
	MAX	11.7	0.130	17.1	0.182	8.0	0.084	2.89	0.0321	0.08 J	0.0009 J	733	8.13	2.70	0.030	4.50	0.0413
	AVG	10.1	0.097	16.6	0.157	7.4	0.070 J	2.61	0.0249	0.07 J	0.0006 J	709	6.73	1.88	0.018	2.80	0.0262
<b>Biosolids Limits</b>	<b>Table 1*</b>	<b>75</b>		<b>420</b>		<b>100</b>						<b>7,500</b>					
	<b>Table 3*</b>			<b>420</b>		<b>100</b>						<b>2,800</b>					

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), 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  
2025**

**TABLE II, 40 CFR Part 122, ORGANICS, PRIORITY POLLUTANTS**

VOLATILE ORGANIC COMPOUNDS						SEMI-VOLATILE ORGANIC COMPOUNDS										ORGANOCHLORINE PESTICIDES								
METHOD EPA 624	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 3520C/608	SAMPLE DATE 08/07/25					
	ANALYTE	CAS #	DL	QL	RDL-RQL		µg/L	ANALYTE	CAS #	DL	QL		RDL-RQL	µg/L	ANALYTE	CAS	DL		QL	RDL-RQL	ug/L	ANALYTE	CAS	DL
Chloromethane	74873	0.060	0.50	1.0 - 2.0	0.060 U	1,2,4-Trichlorobenzene	120821	0.84	20	1.9 - 5.7	0.84 U	Bis(2-ethylhexyl) Phthalate	117817	15	20	2.5 - 7.5	15 U	alpha-BHC	319846	0.51	9.6	3.0 - 9.0	0.51 U	
Vinyl Chloride	75014	0.090	0.50	1.0 - 2.0	0.090 U	2,4,6-Trichlorophenol	88062	7.7	20	2.7 - 8.1	7.7 U	Butyl Benzyl Phthalate	85687	20	20	2.5 - 7.5	20 U	beta-BHC	319857	42	42	6.0 - 18	42 U	
Bromomethane	74839	0.090	0.50	5.0 - 10.0	0.090 U	2,4-Dichlorophenol	120832	2.7	20	2.7 - 8.1	2.7 U	Chrysene	218019	2.0	20	2.5 - 7.5	2.0 U	gamma-BHC (Lindane)	58899	0.67	9.6	4.0 - 12	0.67 U	
Chloroethane	75003	0.10	0.50	1.0 - 2.0	0.10 U	2,4-Dimethylphenol	105679	5.0	20	2.7 - 8.1	5.0 U	Dibenz(a,h)acridine*	226368	-	51	2.5 - 10.0	51 U	delta-BHC	319868	0.46	9.6	9.0 - 27	0.46 U	
1,1-Dichloroethene	75354	0.080	0.50	2.8 - 8.4	0.080 U	2,4-Dinitrophenol	51285	45	100	42 - 126	45 U	Dibenz(a,h)anthracene	53703	3.7	20	2.5 - 7.5	3.7 U	Heptachlor	76448	1.8	9.6	3.0 - 9.0	1.8 U	
Methylene Chloride	75092	0.30	2.0	2.8 - 8.4	0.30 U	2,4-Dinitrotoluene	121142	4.6	20	5.7 - 17.1	4.6 U	Dibenz(a,i)acridine*	224420	-	51	2.5 - 10.0	51 U	Aldrin	309002	0.49	9.6	4.0 - 12	0.49 U	
trans-1,2-Dichloroethene	156605	0.070	0.50	1.6 - 4.8	0.070 U	2,6-Dinitrotoluene	606202	4.2	20	1.9 - 5.7	4.2 U	Dibenzo(a,e)pyrene*	192654	-	51	2.5 - 10.0	51 U	Heptachlor Epoxide	1024573	2.2	9.6	83 - 249	2.2 U	
1,1-Dichloroethane	75343	0.070	0.50	1.0 - 2.0	0.070 U	2-Chloronaphthalene	91587	0.97	20	1.9 - 5.7	0.97 U	Dibenzo(a,h)pyrene*	189640	-	51	2.5 - 10.0	51 U	Endosulfan I	959988	3.2	9.6	14 - 42	3.2 U	
<b>Chloroform</b>	67663	0.070	0.50	1.6 - 4.8	<b>2.1</b>	2-Chlorophenol	95578	1.5	20	3.3 - 9.9	1.5 U	Dibenzo(a,i)pyrene*	189559	-	51	1.3 - 5.0	51 U	Dieldrin	60571	0.52	9.6	2.0 - 6.0	0.52 U	
1,1,1-Trichloroethane (TCA)	71556	0.070	0.50	3.8 - 11.4	0.070 U	2-Methyl-4,6-dinitrophenol	534521	43	51	24 - 72	43 U	Diethyl Phthalate	84662	1.7	20	1.9 - 5.7	1.7 U	4,4'-DDE	72559	0.74	9.6	4.0 - 12	0.74 U	
Carbon Tetrachloride	56235	0.20	0.50	2.8 - 8.4	0.20 U	2-Nitrophenol	88755	2.2	20	3.6 - 10.8	2.2 U	Dimethyl Phthalate	131113	1.8	20	1.6 - 4.8	1.8 U	Endrin	72208	0.53	9.6	6.0 - 18	0.53 U	
Benzene	71432	0.060	0.50	4.4 - 13.2	0.060 U	3,3'-Dichlorobenzidine	91941	2.3	20	16.5 - 49.5	2.3 U	Di-n-butyl Phthalate	84742	19	20	2.5 - 7.5	19 U	Endosulfan II	33213659	0.88	9.6	4.0 - 12	0.88 U	
1,2-Dichloroethane (EDC)	107062	0.060	0.50	2.8 - 8.4	0.060 U	3-Methylcholanthrene*	56495		51	2.0 - 8.0	51 U	Di-n-octyl Phthalate	117840	3.4	20	2.5 - 7.5	3.4 U	4,4'-DDD	72548	0.50	9.6	11 - 33	0.50 U	
Trichloroethene (TCE)	79016	0.080	0.50	1.9 - 5.7	0.080 U	4-Bromophenyl Phenyl Ether	101553	1.5	20	1.9 - 5.7	1.5 U	Fluoranthene	206440	1.8	20	2.2 - 6.6	1.8 U	Endrin Aldehyde	7421934	5.1	9.6	23 - 70	5.1 U	
1,2-Dichloropropane	78875	0.070	0.50	6.0 - 18.0	0.070 U	4-Chloro-3-methylphenol	59507	4.5	20	3.0 - 9.0	4.5 U	Fluorene	86737	0.88	20	1.9 - 5.7	0.88 U	Endosulfan Sulfate	1031078	0.36	9.6	66 - 198	0.36 U	
<b>Bromodichloromethane</b>	75274	0.20	0.50	2.2 - 6.6	<b>0.26 J</b>	4-Chlorophenyl Phenyl Ether	7005723	1.3	20	4.2 - 12.6	1.3 U	Hexachlorobenzene	118741	1.1	20	1.9 - 5.7	1.1 U	4,4'-DDT	50293	0.77	9.6	12 - 36	0.77 U	
2-Chloroethyl Vinyl Ether	110758	0.20	5.0	1.0 - 2.0	0.20 U	4-Nitrophenol	100027	45	51	2.4 - 7.2	45 U	Hexachlorobutadiene	87683	5.3	20	0.9 - 2.7	5.3 U	Toxaphene	8001352	56	480	0.24 - 0.5	56 U	
Trans-1,3-Dichloropropene	10061026	0.090	0.50	1.0 - 2.0	0.090 U	Acenaphthene	83329	0.95	20	1.9 - 5.7	0.95 U	Hexachlorocyclopentadiene	77474	28	100	2.0 - 4.0	28 U	Chlordane	57749	29	190	14 - 42	29 U	
<b>Toluene</b>	108883	0.070	0.50	6.0 - 18.0	<b>1.7</b>	Acenaphthylene	208968	1.4	20	3.5 - 10.5	1.4 U	Hexachloroethane	67721	5.2	20	1.6 - 4.8	5.2 U	<b>POLYCHLORINATED BIPHENYLS (PCBs)</b>						
cis-1,3-Dichloropropene	542756	0.090	0.50	5.0 - 15.0	0.090 U	Anthracene	120127	2.9	20	1.9 - 5.7	2.9 U	Indeno(1,2,3-cd)pyrene	193395	4.9	20	3.7 - 11.1	4.9 U							
1,1,2-Trichloroethane	79005	0.060	0.50	5.0 - 15.0	0.060 U	Azobenzene†	122667	2.1	20	5.0 - 20	2.1 U	Isophorone	78591	4.2	20	2.2 - 6.6	4.2 U							
<b>Tetrachloroethene (PCE)</b>	127184	0.050	0.50	4.1 - 12.3	<b>0.15 J</b>	Benz(a)anthracene	56553	1.6	20	7.8 - 23.4	1.6 U	Naphthalene	91203	0.97	20	1.6 - 4.8	0.97 U	METHOD		SAMPLE DATE				
Dibromochloromethane	124481	0.20	0.50	3.1 - 9.3	0.20 U	Benzidine	92875	47	51	44 - 132	47 U	Nitrobenzene	98953	3.6	20	1.9 - 5.7	3.6 U	EPA 3520C/608		08/07/25				
Chlorobenzene	108907	0.050	0.50	6.0 - 18.0	0.050 U	Benzo(a)pyrene	50328	1.7	20	2.5 - 7.5	1.7 U	N-Nitrosodimethylamine	62759	7.0	20	2.0 - 4.0	7.0 U	ANALYTE		CAS	DL	QL	RDL-RQL	ng/L
<b>Ethylbenzene</b>	100414	0.030	0.50	7.2 - 21.6	<b>0.060 J</b>	Benzo(g,h,i)perylene	191242	3.6	20	4.1 - 12.3	3.6 U	N-Nitrosodi-n-propylamine	621647	3.6	20	0.5 - 1.0	3.6 U	Aroclor-1016	12674112	19	100	0.065 - 0.195	19 U	
Bromoform	75252	0.40	0.50	4.7 - 14.1	0.40 U	Bis(2-chloroethoxy)methane	111911	1.4	20	5.3 - 15.9	1.4 U	N-Nitrosodiphenylamine	86306	2.1	20 U	1.0 - 2.0	2.1 U	Aroclor-1221	11104282	19	100	0.065 - 0.195	19 U	
1,1,2,2-Tetrachloroethane	79345	0.080	0.50	6.9 - 20.7	0.080 U	Bis(2-chloroethyl) Ether	111444	1.7	20	5.7 - 17.1	1.7 U	Pentachlorophenol	87865	13	51	3.6 - 10.8	13 U	Aroclor-1232	11141165	19	100	0.065 - 0.195	19 U	
1,3-Dichlorobenzene	541731	0.060	0.50	1.9 - 7.6	0.060 U	Bis(2-Chloro-1-Methylethyl) Ether *1	108601	1.2	20	5.7 - 17.1	1.2 U	Perylene*	198550	-	20	1.9 - 7.6	20 U	Aroclor-1242	53469219	19	100	0.065 - 0.195	19 U	
<b>1,4-Dichlorobenzene</b>	106467	0.090	0.50	4.4 - 17.6	<b>0.25 J</b>	Benzo(b)fluoranthene	205992	1.4	20	0.8 - 1.6	1.4 U	Phenanthrene	85018	0.85	20	5.4 - 16.2	0.85 U	Aroclor-1248	12672296	19	100	0.065 - 0.195	19 U	
1,2-Dichlorobenzene	95501	0.060	0.50	1.9 - 7.6	0.060 U	Benzo(k)fluoranthene	207089	2.1	20	0.8 - 1.6	2.1 U	<b>Phenol</b>	108952	0.54	20	1.5 - 4.5	<b>16 J</b>	Aroclor-1254	11097691	24	100	0.065 - 0.195	24 U	
Acrolein†	107028	2.0	10	5 - 10	2.0 U							Pyrene	129000	2.3	20	1.9 - 5.7	2.3 U	Aroclor-1260	11096825	24	100	0.065 - 0.195	24 U	
Acrylonitrile†	107131	0.20	2.0	1.0 - 2.0	0.20 U							† - 1,2-Diphenylhydrazine is reported as Azobenzene												

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), Kelso, WA

\* - This compound is searched for as a tentatively identified compound.

† - These compounds are unstable under normal conditions. As per EPA Method 624 guideline, the reported values are estimates.

\*1 - Previously reported as: Bis(2-chloroisopropyl) ether

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

**BUDD INLET TREATMENT PLANT  
FINAL EFFLUENT  
2025**

**TABLE II, 40 CFR Part 122, ORGANICS, PRIORITY POLLUTANTS**

VOLATILE ORGANIC COMPOUNDS						SEMI-VOLATILE ORGANIC COMPOUNDS										ORGANOCHLORINE PESTICIDES							
METHOD EPA 624	SAMPLE DATE 08/08/25					METHOD EPA 625	SAMPLE DATE 08/08/25					METHOD EPA 625	SAMPLE DATE 08/08/25					METHOD EPA 3520C/608	SAMPLE DATE 08/08/25				
	ANALYTE	CAS #	DL	QL	RDL-RQL		µg/L	ANALYTE	CAS #	DL	QL		RDL-RQL	µg/L	ANALYTE	CAS	DL		QL	RDL-RQL	ug/L	ANALYTE	CAS
Chloromethane	74873	0.060	0.50	1.0 - 2.0	0.060 U	1,2,4-Trichlorobenzene	120821	0.034	0.81	1.9 - 5.7	0.034 U	Bis(2-ethylhexyl) Phthalate	117817	0.59	0.81	2.5 - 7.5	0.59 U	alpha-BHC	319846	0.51	9.4	3.0 - 9.0	0.51 U
Vinyl Chloride	75014	0.090	0.50	1.0 - 2.0	0.090 U	2,4,6-Trichlorophenol	88062	0.31	0.81	2.7 - 8.1	0.31 U	Butyl Benzyl Phthalate	85687	0.79	0.81	2.5 - 7.5	0.79 U	beta-BHC	319857	42	42	6.0 - 18	42 U
Bromomethane	74839	0.090	0.50	5.0 - 10.0	0.090 U	2,4-Dichlorophenol	120832	0.11	0.81	2.7 - 8.1	0.11 U	Chrysene	218019	0.080	0.81	2.5 - 7.5	0.080 U	gamma-BHC (Lindane)	58899	0.67	9.4	4.0 - 12	0.67 U
Chloroethane	75003	0.10	0.50	1.0 - 2.0	0.10 U	2,4-Dimethylphenol	105679	0.20	0.81	2.7 - 8.1	0.20 U	Dibenz(a,h)acridine*	226368	-	2.0	2.5 - 10.0	2.0 U	delta-BHC	319868	0.46	9.4	9.0 - 27	0.46 U
1,1-Dichloroethene	75354	0.080	0.50	2.8 - 8.4	0.080 U	2,4-Dinitrophenol	51285	1.8	4.1	42 - 126	1.8 U	Dibenz(a,h)anthracene	53703	0.15	0.81	2.5 - 7.5	0.15 U	Heptachlor	76448	0.51	9.4	3.0 - 9.0	0.51 U
Methylene Chloride	75092	0.30	2.0	2.8 - 8.4	0.30 U	2,4-Dinitrotoluene	121142	0.19	0.81	5.7 - 17.1	0.19 U	Dibenz(a,i)acridine*	224420	-	2.0	2.5 - 10.0	2.0 U	Aldrin	309002	0.49	9.4	4.0 - 12	0.49 U
trans-1,2-Dichloroethene	156605	0.070	0.50	1.6 - 4.8	0.070 U	2,6-Dinitrotoluene	606202	0.17	0.81	1.9 - 5.7	0.17 U	Dibenzo(a,e)pyrene*	192654	-	2.0	2.5 - 10.0	2.0 U	Heptachlor Epoxide	1024573	2.2	9.4	83 - 249	2.2 U
1,1-Dichloroethane	75343	0.070	0.50	1.0 - 2.0	0.070 U	2-Chloronaphthalene	91587	0.039	0.81	1.9 - 5.7	0.039 U	Dibenzo(a,h)pyrene*	189640	-	2.0	2.5 - 10.0	2.0 U	Endosulfan I	959988	3.2	9.4	14 - 42	3.2 U
<b>Chloroform</b>	67663	0.070	0.50	1.6 - 4.8	<b>0.62</b>	2-Chlorophenol	95578	0.058	0.81	3.3 - 9.9	0.058 U	Dibenzo(a,i)pyrene*	189559	-	2.0	1.3 - 5.0	2.0 U	Dieldrin	60571	0.52	9.4	2.0 - 6.0	0.52 U
1,1,1-Trichloroethane (TCA)	71556	0.070	0.50	3.8 - 11.4	0.070 U	2-Methyl-4,6-dinitrophenol	534521	1.7	2.0	24 - 72	1.7 U	Diethyl Phthalate	84662	0.066	0.81	1.9 - 5.7	0.066 U	4,4'-DDE	72559	0.74	9.4	4.0 - 12	0.74 U
Carbon Tetrachloride	56235	0.20	0.50	2.8 - 8.4	0.20 U	2-Nitrophenol	88755	0.087	0.81	3.6 - 10.8	0.087 U	Dimethyl Phthalate	131113	0.069	0.81	1.6 - 4.8	0.069 U	Endrin	72208	0.53	9.4	6.0 - 18	0.53 U
Benzene	71432	0.060	0.50	4.4 - 13.2	0.060 U	3,3'-Dichlorobenzidine	91941	0.091	0.81	16.5 - 49.5	0.091 U	Di-n-butyl Phthalate	84742	0.74	0.81	2.5 - 7.5	0.74 U	Endosulfan II	33213659	0.88	9.4	4.0 - 12	0.88 U
1,2-Dichloroethane (EDC)	107062	0.060	0.50	2.8 - 8.4	0.060 U	3-Methylcholanthrene*	56495	-	2.0	2.0 - 8.0	2.0 U	Di-n-octyl Phthalate	117840	0.14	0.81	2.5 - 7.5	0.14 U	4,4'-DDD	72548	0.50	9.4	11 - 33	0.50 U
Trichloroethene (TCE)	79016	0.080	0.50	1.9 - 5.7	0.080 U	4-Bromophenyl Phenyl Ether	101553	0.057	0.81	1.9 - 5.7	0.057 U	Fluoranthene	206440	0.070	0.81	2.2 - 6.6	0.070 U	Endrin Aldehyde	7421934	5.1	9.4	23 - 70	5.1 U
1,2-Dichloropropane	78875	0.070	0.50	6.0 - 18.0	0.070 U	4-Chloro-3-methylphenol	59507	0.18	0.81	3.0 - 9.0	0.18 U	Fluorene	86737	0.036	0.81	1.9 - 5.7	0.036 U	Endosulfan Sulfate	1031078	0.36	9.4	66 - 198	0.36 U
<b>Bromodichloromethane</b>	75274	0.20	0.50	2.2 - 6.6	<b>0.21 J</b>	4-Chlorophenyl Phenyl Ether	7005723	0.051	0.81	4.2 - 12.6	0.051 U	Hexachlorobenzene	118741	0.042	0.81	1.9 - 5.7	0.042 U	4,4'-DDT	50293	0.77	9.4	12 - 36	0.77 U
2-Chloroethyl Vinyl Ether	110758	0.20	5.0	1.0 - 2.0	0.20 U	4-Nitrophenol	100027	1.8	2.0	2.4 - 7.2	1.8 U	Hexachlorobutadiene	87683	0.22	0.81	0.9 - 2.7	0.22 U	Toxaphene	8001352	56	470	0.24 - 0.5	56 U
Trans-1,3-Dichloropropene	10061026	0.090	0.50	1.0 - 2.0	0.090 U	Acenaphthene	83329	0.038	0.81	1.9 - 5.7	0.038 U	Hexachlorocyclopentadiene	77474	1.2	4.1	2.0 - 4.0	1.2 U	Chlordane	57749	29	190	14 - 42	29 U
Toluene	108883	0.070	0.50	6.0 - 18.0	0.070 U	Acenaphthylene	208968	0.053	0.81	3.5 - 10.5	0.053 U	Hexachloroethane	67721	0.21	0.81	1.6 - 4.8	0.21 U	<b>POLYCHLORINATED BIPHENYLS (PCBs)</b>					
cis-1,3-Dichloropropene	542756	0.090	0.50	5.0 - 15.0	0.090 U	Anthracene	120127	0.12	0.81	1.9 - 5.7	0.12 U	Indeno(1,2,3-cd)pyrene	193395	0.20	0.81	3.7 - 11.1	0.20 U						
1,1,2-Trichloroethane	79005	0.060	0.50	5.0 - 15.0	0.060 U	Azobenzene†	122667	0.083	0.81	5.0 - 20	0.083 U	Isophorone	78591	0.17	0.81	2.2 - 6.6	0.17 U	METHOD EPA 3520C/608					
Tetrachloroethene (PCE)	127184	0.050	0.50	4.1 - 12.3	0.050 U	Benzo(a)anthracene	56553	0.061	0.81	7.8 - 23.4	0.061 U	Naphthalene	91203	0.039	0.81	1.6 - 4.8	0.039 U	SAMPLE DATE 08/08/25					
Dibromochloromethane	124481	0.20	0.50	3.1 - 9.3	0.20 U	Benzenidine	92875	1.9	2.0	44 - 132	1.9 U	Nitrobenzene	98953	0.15	0.81	1.9 - 5.7	0.15 U	ANALYTE					
Chlorobenzene	108907	0.050	0.50	6.0 - 18.0	0.050 U	Benzo(a)pyrene	50328	0.065	0.81	2.5 - 7.5	0.065 U	N-Nitrosodimethylamine	62759	0.28	0.81	2.0 - 4.0	0.28 U	CAS	DL	QL	RDL-RQL	ug/L	
Ethylbenzene	100414	0.030	0.50	7.2 - 21.6	0.030 U	Benzo(g,h,i)perylene	191242	0.15	0.81	4.1 - 12.3	0.15 U	N-Nitrosodi-n-propylamine	621647	0.15	0.81	0.5 - 1.0	0.15 U	Aroclor-1016	12674112	19	100	0.065 - 0.195	19 U
Bromoform	75252	0.40	0.50	4.7 - 14.1	0.40 U	Bis(2-chloroethoxy)methane	111911	0.053	0.81	5.3 - 15.9	0.053 U	N-Nitrosodiphenylamine	86306	0.083	0.81	1.0 - 2.0	0.083 U	Aroclor-1221	11104282	19	100	0.065 - 0.195	19 U
1,1,2,2-Tetrachloroethane	79345	0.080	0.50	6.9 - 20.7	0.080 U	Bis(2-chloroethyl) Ether *1	111444	0.067	0.81	5.7 - 17.1	0.067 U	Pentachlorophenol	87865	0.50	2.0	3.6 - 10.8	0.50 U	Aroclor-1232	11141165	19	100	0.065 - 0.195	19 U
1,3-Dichlorobenzene	541731	0.060	0.50	1.9 - 7.6	0.060 U	Bis(2-Chloro-1-Methylethyl) Ether *1	108601	0.047	0.81	5.7 - 17.1	0.047 U	Perylene*	198550	-	0.81	1.9 - 7.6	0.81 U	Aroclor-1242	53469219	19	100	0.065 - 0.195	19 U
<b>1,4-Dichlorobenzene</b>	106467	0.090	0.50	4.4 - 17.6	<b>0.12 J</b>	Benzo(b)fluoranthene	205992	0.056	0.81	0.8 - 1.6	0.056 U	Phenanthrene	85018	0.034	0.81	5.4 - 16.2	0.034 U	Aroclor-1248	12672296	19	100	0.065 - 0.195	19 U
1,2-Dichlorobenzene	95501	0.060	0.50	1.9 - 7.6	0.060 U	Benzo(k)fluoranthene	207089	0.081	0.81		0.081 U	Phenol	108952	0.022	0.81	1.5 - 4.5	0.022 U	Aroclor-1254	11097691	24	100	0.065 - 0.195	24 U
Acrolein†	107028	2.0	10	5 - 10	2.0 U							Pyrene	129000	0.092	0.81	1.9 - 5.7	0.092 U	Aroclor-1260	11096825	24	100	0.065 - 0.195	24 U
Acrylonitrile†	107131	0.20	2.0	1.0 - 2.0	0.20 U							† - 1,2-Diphenylhydrazine is reported as Azobenzene											

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), 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

\* - This compound is searched for as a tentatively identified compound.

\*1 - Previously reported as: Bis(2-chloroisopropyl) ether

\*2 Sum of Benzo(b)fluoranthene (CAS 205992), Benzo(k)fluoranthene (CAS 207089)

**BUDD INLET TREATMENT PLANT**

**BIOSOLIDS**

**2025**

**40 CFR Part 122 Table II, Organics, Priority Pollutants**

VOLATILE ORGANIC COMPOUNDS										SEMI-VOLATILE ORGANIC COMPOUNDS										ORGANOCHLORINE PESTICIDES										
Method EPA 5035A 8260C					Method EPA 5035A 8260C					Method EPA 3541 8270D					Method EPA 3541 8270D					Method EPA 3541 8081B										
SAMPLE DATE 8/7/25					SAMPLE DATE 8/7/25					SAMPLE DATE 8/7/25					SAMPLE DATE 8/7/25					SAMPLE DATE 8/7/25										
ANALYTE	CAS #	DL	QL	RDL-RQL	ug/L	ANALYTE	CAS #	DL	QL	RDL-RQL	ug/L	ANALYTE	CAS #	DL	QL	RDL-RQL	ug/L	ANALYTE	CAS #	DL	QL	RDL-RQL	ug/L							
Acetone	67641	71	480		5100	cis-1,3-Dichloropropene	542756	0.58	22	1 - 2	0.58 U	1,2,4-Trichlorobenzene	120821	1.6	46	0.3 - 0.6	1.6 U	Benzoic Acid	65850	20	280		20 U	alpha-BHC	319846	1.3	4.4	0.025 - 0.05	1.3 U	
Benzene	71432	0.24	22	1 - 2	0.24 U	trans-1,3-Dichloropropene	10061026	0.49	22		0.49 U	1,2-Dichlorobenzene	95501	1.1	46	1.9 - 736	1.1 U	Benzyl Alcohol	100516	1.1	46		1.1 U	beta-BHC	319857	1.2	4.4	0.025 - 0.05	1.2 U	
Bromobenzene	108861	0.40	22		0.40 U	Ethylbenzene	100414	0.42	22	1 - 2	0.42 U	1,3-Dichlorobenzene	541731	1.2	46	1.9 - 7.6	1.2 U	Bis(2-chloroethoxy) methane	111911	1.4	46		1.4 U	gamma-BHC (Lindane)	58899	320	320	0.025 - 0.05	320 U	
Bromochloromethane	74975	1.1	22		1.1 U	Hexachlorobutadiene	87683	1.8	89	0.5 - 1	1.8 U	1,4-Dichlorobenzene	106467	1.2	46	4.4 - 17.6	1.2 U	Bis(2-chloroethyl) Ether	111444	1.2	46	0.3 - 1	1.2 U	delta-BHC	319868	1.3	4.4	0.025 - 0.05	1.3 U	
Bromodichloromethane	75274	0.72	22	1 - 2	0.72 U	2-Hexanone	591786	4.2	89		4.2 U	2,4,5-Trichlorophenol	95954	1.2	46		1.2 U	Bis(2-chloro-1-methylethyl) Ether *1	52438912	1.1	46	0.5 - 1	1.1 U	Heptachlor	76448	1.8	4.4	0.025 - 0.05	42 P	
Bromoform	75252	0.63	22	1 - 2	0.63 U	Isopropylbenzene	98828	0.36	89		0.36 U	2,4,6-Trichlorophenol	88062	2.0	46	2 - 4	2.0 U	Bis(2-ethylhexyl) Phthalate	117817	0.99	46	0.3 - 1	18 J	Aldrin	309002	2.7	8.8	0.025 - 0.05	2.7 U	
Bromomethane	74839	0.89	22	5 - 10	0.89 U	4-Isopropyltoluene	99876	0.29	89		150	2,4-Dichlorophenol	120832	1.1	46	0.5 - 1	1.1 U	Butyl Benzyl Phthalate	85687	2.1	46	0.3 - 0.6	2.1 U	Heptachlor Epoxide	1024573	3.0	8.8	0.025 - 0.05	3.0 U	
2-Butanone (MEK)	78933	4.0	89		760	4-Methyl-2-pentanone (MIBK)	108101	8.0	89		8.0 U	2,4-Dimethylphenol	105679	5.0	46	0.5 - 1	5.0 U	Chrysene	218019	2.0	46	0.3 - 0.6	2.0 U	gamma-Chlordane†	5566347	1.7	4.4		1.7 U	
n-Butylbenzene	104518	0.31	89		0.3 U	Methylene Chloride	75092	0.72	44	5 - 10	5.4 J	2,4-Dinitrophenol	51285	20	280	1.5 - 3	20 U	Dibenz(a,h)anthracene	53703	2.0	46	0.8 - 1.6	2.0 U	Endosulfan I	959988	1.7	4.4	0.025 - 0.05	1.7 U	
sec-Butylbenzene	135988	0.33	89		0.33 U	Naphthalene	91203	0.58	89	0.4 - 0.75	7.2 J	2,4-Dinitrotoluene	121142	2.1	46	1 - 2	2.1 U	Dibenzofuran	132649	1.4	46		1.4 U	alpha-Chlordane	5103719	1.9	4.4		1.9 U	
tert-Butylbenzene	98066	0.63	89		0.63 U	n-Propylbenzene	103651	0.58	89		0.58 U	2,6-Dinitrotoluene	606202	1.1	46	1 - 2	1.1 U	Diethyl Phthalate	84662	1.1	46	1.9 - 7.6	1.1 U	Dieldrin	60571	0.98	4.4	0.025 - 0.05	0.98 U	
Carbon Disulfide	75150	0.41	22		8.4 J	Styrene	100425	0.63	22		0.63 U	2-Chloronaphthalene	91587	1.4	46	0.3 - 0.6	1.4 U	Dimethyl Phthalate	131113	1.1	46	1.6 - 6.4	1.1 U	4,4'-DDE	72559	1.8	4.4	0.025 - 0.05	1.8 U	
Carbon Tetrachloride	56235	0.42	22	1 - 2	0.42 U	1,1,1,2-Tetrachloroethane	630206	0.49	22		0.49 U	2-Chlorophenol	95578	1.2	46	1 - 2	1.2 U	Di-n-butyl Phthalate	84742	2.1	46	0.5 - 1	2.1 U	Endrin	72208	1.5	4.4	0.025 - 0.05	1.5 U	
Chlorobenzene	108907	0.29	22	1 - 2	0.29 U	1,1,2,2-Tetrachloroethane	79345	0.58	22	1.9 - 2	0.58 U	2-Methyl-4,6-dinitrophenol	534521	4.5	280		4.5 U	Di-n-octyl Phthalate	117840	1.4	46	0.3 - 0.6	1.4 U	Endosulfan II	33213659	3.1	8.8	0.025 - 0.05	3.1 U	
Chloroethane	75003	3.3	22	1 - 2	3.3 U	Tetrachloroethene (PCE)	127184	0.72	22	1 - 2	0.72 U	2-Methylnaphthalene	91576	1.6	46		1.6 U	Fluoranthene	206440	1.7	46	0.3 - 0.6	1.7 U	4,4'-DDD	72548	2.7	8.8	0.025 - 0.05	2.7 U	
Chloroform	67663	0.49	22	1 - 2	0.49 U	Toluene	108883	0.67	22	1 - 2	7.4 J	2-Methylphenol	95487	2.1	46		2.1 U	Fluorene	86737	1.9	46	0.3 - 0.6	1.9 U	Endrin Aldehyde	7421934	4.0	8.8	0.025 - 0.05	4.0 U	
Chloromethane	74873	0.80	22	1 - 2	0.80 U	1,2,3-Trichlorobenzene	87616	0.85	89		0.85 U	2-Nitroaniline	88744	5.9	46		5.9 U	Hexachlorobenzene	118741	2.3	46	0.3 - 0.6	2.3 U	Endosulfan Sulfate	1031078	4.4	8.8	0.025 - 0.05	4.4 U	
2-Chlorotoluene	95498	0.54	89		0.54 U	1,2,4-Trichlorobenzene	120821	0.58	89	0.3 - 0.6	0.58 U	2-Nitrophenol	88755	2.0	46	0.5 - 1	2.0 U	Hexachlorobutadiene	87683	1.6	46	0.5 - 1	1.6 U	4,4'-DDT	50293	2.7	8.8	0.025 - 0.05	2.7 U	
4-Chlorotoluene	106434	0.40	89		0.40 U	1,1,2-Trichloroethane	79005	0.67	22	1 - 2	0.67 U	3,3'-Dichlorobenzidine	91941	3.8	46	2 - 14	3.8 U	Hexachlorocyclopentadiene	77474	3.4	46	2 - 4	3.4 U	Endrin Ketone	53494705	2.0	4.4		2.0 U	
1,2-Dibromo-3-chloropropane	96128	1.8	89		1.8 U	1,1,1-Trichloroethane (TCA)	71556	0.49	22	1 - 2	0.49 U	3-Nitroaniline	99092	1.1	46		1.1 U	Hexachloroethane	67721	1.1	46	0.5 - 1	1.1 U	Methoxychlor	72435	3.2	8.8		3.2 U	
Dibromochloromethane	124481	0.80	22	1 - 2	0.80 U	Trichloroethene (TCE)	79016	0.67	22	1 - 2	0.67 U	4-Bromophenyl Phenyl Ether	101553	1.9	46	0.3 - 0.5	1.9 U	Indeno(1,2,3-cd)pyrene	193395	1.6	46	0.5 - 1	1.6 U	Toxaphene	8001352	160	440	0.24 - 0.5	160 U	
1,2-Dibromoethane (EDB)	106934	0.42	89		0.42 U	Trichlorofluoromethane (CFC 11)	75694	0.38	22		0.38 U	4-Chloro-3-methylphenol	59507	23	46		23 U	Isophorone	78591	1.6	46	0.5 - 1	1.6 U							
Dibromomethane	74953	1.3	22		1.3 U	1,2,3-Trichloropropane	96184	2.0	22		2.0 U	4-Chloroaniline	106478	0.97	46		0.97 U	Naphthalene	91203	1.6	46	0.4 - 0.75	1.6 U							
1,2-Dichlorobenzene	95501	0.35	22	1.9 - 736	0.35 U	1,2,4-Trimethylbenzene	95636	0.24	89		3.8 J	4-Chlorophenyl Phenyl Ether	7005723	1.2	46	0.3 - 0.5	1.2 U	Nitrobenzene	98953	1.6	46	0.5 - 1	1.6 U							
1,3-Dichlorobenzene	541731	0.42	22	1.9 - 7.6	20 J	1,3,5-Trimethylbenzene	108678	0.41	89		0.41 U	4-Methylphenol †	106445	1.4	46		1.4 U	N-Nitrosodimethylamine	62759	42	280	1 - 2	42 U							
1,4-Dichlorobenzene	106467	0.39	22	4.4 - 17.6	21 J	Vinyl Chloride	75014	0.80	22	1 - 2	0.80 U	4-Nitroaniline	100016	1.4	280		1.4 U	N-Nitrosodi-n-propylamine	621647	1.6	46	0.5 - 1	1.6 U							
Dichlorodifluoromethane	75718	0.54	22		0.54 U	o-Xylene	95476	0.36	22		2.1 J	4-Nitrophenol	100027	6.8	280	1 - 2	6.8 U	N-Nitrosodiphenylamine	86306	1.1	46	1 - 2	1.1 U							
1,1-Dichloroethane	75343	0.54	22	1 - 2	0.54 U	m,p-Xylenes	179601231	0.45	22		3.3 J	Acenaphthene	83329	1.3	46	0.2 - 0.4	1.3 U	Pentachlorophenol	87865	8.8	280	0.5 - 1	8.8 U	Aroclor-1016	12674112	5.4	21	0.05 - 0.2	5.4 U	
1,2-Dichloroethane (EDC)	107062	0.32	22	1 - 2	0.32 U							Acenaphthylene	208968	0.99	46	0.3 - 0.6	0.99 U	Phenanthrene	85018	1.6	46	0.3 - 0.6	1.6 U	Aroclor-1221	11104282	5.4	21	0.05 - 0.2	5.4 U	
1,1-Dichloroethene	75354	1.2	22	1 - 2	1.2 U							Aniline	62533	1.7	140		1.7 U	Phenol	108952	2.7	46	2 - 4	2.7 U	Aroclor-1232	11141165	5.4	21	0.05 - 0.2	5.4 U	
cis-1,2-Dichloroethene	156592	0.54	22		0.54 U							Anthracene	120127	1.2	46	0.3 - 0.6	1.2 U	Pyrene	129000	1.4	46	0.3 - 0.6	1.4 U	Aroclor-1242	53469219	5.4	21	0.05 - 0.2	190	
trans-1,2-Dichloroethene	156605	0.54	22	1 - 2	0.54 U							Benz(a)anthracene	56553	1.3	46	0.3 - 0.6	1.3 U							Aroclor-1248	12672296	5.4	21	0.05 - 0.2	5.4 U	
1,2-Dichloropropane	78875	0.58	22	1 - 2	0.58 U							Benzo(a)pyrene	50328	2.3	46	0.5 - 1	2.3 U							Aroclor-1254	11097691	78	78	0.05 - 0.2	78 U	
1,3-Dichloropropane	142289	0.54	22		0.54 U							Benzo(g,h,i)perylene	191242	1.6	46	0.5 - 1	1.6 U							Aroclor-1260	11096825	5.4	21	0.05 - 0.2	140	
2,2-Dichloropropane	594207	0.44	22		0.44 U							Benzo(b)fluoranthene	205992	1.7	46	0.8 - 1.6	1.7 U													
1,1-Dichloropropene	563586	0.58	22		0.58 U							Benzo(k)fluoranthene	207089	2.0	46	0.8 - 1.6	2.0 U													

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), 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

† – This analyte cannot be separated from 3-Methylphenol.

\*1 - Previously reported as: Bis(2-chloroisopropyl) ether

**MARTIN WAY RECLAIMED WATER PLANT  
PRIMARY INFLUENT  
2025  
TABLE II, 40 CFR Part 122, ORGANICS, PRIORITY POLLUTANTS**

VOLATILE ORGANIC COMPOUNDS						SEMI-VOLATILE ORGANIC COMPOUNDS										ORGANOCHLORINE PESTICIDES								
METHOD EPA 624	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 3520C/608	SAMPLE DATE 08/07/25					
	ANALYTE	CAS #	DL	QL	RDL-RQL		µg/L	ANALYTE	CAS #	DL	QL		RDL-RQL	µg/L	ANALYTE	CAS	DL		QL	RDL-RQL	ug/L	ANALYTE	CAS	DL
<b>Chloromethane</b>	74873	0.060	5.0	1.0 - 2.0	<b>0.14 J</b>	1,2,4-Trichlorobenzene	120821	0.84	20	1.9 - 5.7	0.84 U	Bis(2-ethylhexyl) Phthalate	117817	15	20	2.5 - 7.5	15 U	alpha-BHC	319846	0.51	9.4	3.0 - 9.0	0.51 U	
Vinyl Chloride	75014	0.090	5.0	1.0 - 2.0	0.090 U	2,4,6-Trichlorophenol	88062	7.7	20	2.7 - 8.1	7.7 U	Butyl Benzyl Phthalate	85687	20	20	2.5 - 7.5	20 U	beta-BHC	319857	42	42	6.0 - 18	42 U	
Bromomethane	74839	0.090	5.0	5.0 - 10.0	0.090 U	2,4-Dichlorophenol	120832	2.7	20	2.7 - 8.1	2.7 U	Chrysene	218019	2.0	20	2.5 - 7.5	2.0 U	gamma-BHC (Lindane)	58899	0.67	9.4	4.0 - 12	0.67 U	
Chloroethane	75003	0.10	5.0	1.0 - 2.0	0.10 U	2,4-Dimethylphenol	105679	5.0	20	2.7 - 8.1	5.0 U	Dibenz(a,h)acridine*	226368	-	51	2.5 - 10.0	51 U	delta-BHC	319868	0.46	9.4	9.0 - 27	0.46 U	
1,1-Dichloroethene	75354	0.080	5.0	2.8 - 8.4	0.080 U	2,4-Dinitrophenol	51285	45	100	42 - 126	45 U	Dibenz(a,h)anthracene	53703	3.7	20	2.5 - 7.5	3.7 U	Heptachlor	76448	2.5	9.4	3.0 - 9.0	2.5 U	
Methylene Chloride	75092	0.30	5.0	2.8 - 8.4	0.30 U	2,4-Dinitrotoluene	121142	4.6	20	5.7 - 17.1	4.6 U	Dibenz(a,i)acridine*	224420	-	51	2.5 - 10.0	51 U	<b>Aldrin</b>	309002	0.49	9.4	4.0 - 12	<b>0.0079 J</b>	
trans-1,2-Dichloroethene	156605	0.070	5.0	1.6 - 4.8	0.070 U	2,6-Dinitrotoluene	606202	4.2	20	1.9 - 5.7	4.2 U	Dibenzo(a,e)pyrene*	192654	-	51	2.5 - 10.0	51 U	Heptachlor Epoxide	1024573	2.2	9.4	83 - 249	2.2 U	
1,1-Dichloroethane	75343	0.070	5.0	1.0 - 2.0	0.070 U	2-Chloronaphthalene	91587	0.97	20	1.9 - 5.7	0.97 U	Dibenzo(a,h)pyrene*	189640	-	51	2.5 - 10.0	51 U	Endosulfan I	959988	3.2	9.4	14 - 42	3.2 U	
<b>Chloroform</b>	67663	0.070	5.0	1.6 - 4.8	<b>1.2 J</b>	2-Chlorophenol	95578	1.5	20	3.3 - 9.9	1.5 U	Dibenzo(a,i)pyrene*	189559	-	51	1.3 - 5.0	51 U	Dieldrin	60571	0.52	9.4	2.0 - 6.0	0.52 U	
1,1,1-Trichloroethane (TCA)	71556	0.070	5.0	3.8 - 11.4	0.070 U	2-Methyl-4,6-dinitrophenol	534521	43	51	24 - 72	43 U	Diethyl Phthalate	84662	1.7	20	1.9 - 5.7	1.7 U	4,4'-DDE	72559	0.74	9.4	4.0 - 12	0.74 U	
Carbon Tetrachloride	56235	0.20	5.0	2.8 - 8.4	0.20 U	2-Nitrophenol	88755	2.2	20	3.6 - 10.8	2.2 U	Dimethyl Phthalate	131113	1.8	20	1.6 - 4.8	1.8 U	Endrin	72208	0.53	9.4	6.0 - 18	0.53 U	
Benzene	71432	0.060	5.0	4.4 - 13.2	0.060 U	3,3'-Dichlorobenzidine	91941	2.3	20	16.5 - 49.5	2.3 U	Di-n-butyl Phthalate	84742	19	20	2.5 - 7.5	19 U	Endosulfan II	33213659	0.88	9.4	4.0 - 12	0.88 U	
1,2-Dichloroethane (EDC)	107062	0.060	5.0	2.8 - 8.4	0.060 U	3-Methylcholanthrene*	56495	-	51	2.0 - 8.0	51 U	Di-n-octyl Phthalate	117840	3.4	20	2.5 - 7.5	3.4 U	4,4'-DDD	72548	0.50	9.4	11 - 33	0.50 U	
Trichloroethene (TCE)	79016	0.080	5.0	1.9 - 5.7	0.080 U	4-Bromophenyl Phenyl Ether	101553	1.5	20	1.9 - 5.7	1.5 U	Fluoranthene	206440	1.8	20	2.2 - 6.6	1.8 U	Endrin Aldehyde	7421934	5.1	9.4	23 - 70	5.1 U	
1,2-Dichloropropane	78875	0.070	5.0	6.0 - 18.0	0.070 U	4-Chloro-3-methylphenol	59507	4.5	20	3.0 - 9.0	4.5 U	Fluorene	86737	0.88	20	1.9 - 5.7	0.88 U	Endosulfan Sulfate	1031078	0.36	9.4	66 - 198	0.36 U	
Bromodichloromethane	75274	0.20	5.0	2.2 - 6.6	0.20 U	4-Chlorophenyl Phenyl Ether	7005723	1.3	20	4.2 - 12.6	1.3 U	Hexachlorobenzene	118741	1.1	20	1.9 - 5.7	1.1 U	4,4'-DDT	50293	0.77	9.4	12 - 36	0.77 U	
2-Chloroethyl Vinyl Ether	110758	0.20	10	1.0 - 2.0	0.20 U	4-Nitrophenol	100027	45	51	2.4 - 7.2	45 U	Hexachlorobutadiene	87683	5.3	20	0.9 - 2.7	5.3 U	Toxaphene	8001352	56	470	0.24 - 0.5	56 U	
Trans-1,3-Dichloropropene	10061026	0.090	5.0	1.0 - 2.0	0.090 U	Acenaphthene	83329	0.95	20	1.9 - 5.7	0.95 U	Hexachlorocyclopentadiene	77474	28	100	2.0 - 4.0	28 U	Chlordane	57749	29	190	14 - 42	29 U	
<b>Toluene</b>	108883	0.070	5.0	6.0 - 18.0	<b>9.0</b>	Acenaphthylene	208968	1.4	20	3.5 - 10.5	1.4 U	Hexachloroethane	67721	5.2	20	1.6 - 4.8	5.2 U	<b>POLYCHLORINATED BIPHENYLS (PCBs)</b>						
cis-1,3-Dichloropropene	542756	0.090	5.0	5.0 - 15.0	0.090 U	Anthracene	120127	2.9	20	1.9 - 5.7	2.9 U	Indeno(1,2,3-cd)pyrene	193395	4.9	20	3.7 - 11.1	4.9 U							
1,1,2-Trichloroethane	79005	0.060	5.0	5.0 - 15.0	0.060 U	Azobenzene†	122667	2.1	20	5.0 - 20	2.1 U	Isophorone	78591	4.2	20	2.2 - 6.6	4.2 U							
Tetrachloroethene (PCE)	127184	0.050	5.0	4.1 - 12.3	0.05 U	Benz(a)anthracene	56553	1.6	20	7.8 - 23.4	1.6 U	Naphthalene	91203	0.97	20	1.6 - 4.8	0.97 U	METHOD EPA 3520C/608		SAMPLE DATE 08/07/25				
Dibromochloromethane	124481	0.20	5.0	3.1 - 9.3	0.20 U	Benzidine	92875	47	51	44 - 132	47 U	Nitrobenzene	98953	3.6	20	1.9 - 5.7	3.6 U							
Chlorobenzene	108907	0.050	5.0	6.0 - 18.0	0.050 U	Benzo(a)pyrene	50328	1.7	20	2.5 - 7.5	1.7 U	N-Nitrosodimethylamine	62759	7.0	20	2.0 - 4.0	7.0 U	ANALYTE		CAS	DL	QL	RDL-RQL	ng/L
Ethylbenzene	100414	0.030	5.0	7.2 - 21.6	0.030 U	Benzo(g,h,i)perylene	191242	3.6	20	4.1 - 12.3	3.6 U	N-Nitrosodi-n-propylamine	621647	3.6 U	20	0.5 - 1.0	3.6 U			Aroclor-1016	12674112	19	100	0.065 - 0.195
Bromoform	75252	0.40	5.0	4.7 - 14.1	0.40 U	Bis(2-chloroethoxy)methane	111911	1.4	20	5.3 - 15.9	1.4 U	N-Nitrosodiphenylamine	86306	2.1	20	1.0 - 2.0	2.1 U	Aroclor-1221	11104282	19	100	0.065 - 0.195	19 U	
1,1,2,2-Tetrachloroethane	79345	0.080	5.0	6.9 - 20.7	0.080 U	Bis(2-chloroethyl) Ether	111444	1.7	20	5.7 - 17.1	1.7 U	Pentachlorophenol (PCP)	87865	13	51	3.6 - 10.8	13 U	Aroclor-1232	11141165	19	100	0.065 - 0.195	19 U	
1,3-Dichlorobenzene	541731	0.060	5.0	1.9 - 7.6	0.060 U	Bis(2-Chloro-1-Methylethyl) Ether *1	108601	1.2	20	5.7 - 17.1	1.2 U	Perylene*	198550	-	20	1.9 - 7.6	20 U	Aroclor-1242	53469219	19	100	0.065 - 0.195	19 U	
<b>1,4-Dichlorobenzene</b>	106467	0.090	5.0	4.4 - 17.6	<b>0.45 J</b>	Benzo(b)fluoranthene	205992	1.4	20	0.8 - 1.6	1.4 U	Phenanthrene	85018	0.85	20	5.4 - 16.2	0.85 U	Aroclor-1248	12672296	19	100	0.065 - 0.195	19 U	
1,2-Dichlorobenzene	95501	0.060	5.0	1.9 - 7.6	0.060 U	Benzo(k)fluoranthene	207089	2.1	20	0.8 - 1.6	2.1 U	<b>Phenol</b>	108952	0.54	20	1.5 - 4.5	<b>18 J</b>	Aroclor-1254	11097691	24	100	0.065 - 0.195	24 U	
Acrolein†	107028	2.0	50	5 - 10	2.0 U							Pyrene	129000	2.3	20	1.9 - 5.7	2.3 U	Aroclor-1260	11096825	24	100	0.065 - 0.195	24 U	
Acrylonitrile†	107131	0.20	100	1.0 - 2.0	0.20 U							† - 1,2-Diphenylhydrazine is reported as Azobenzene												

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), Kelso, WA

\* - This compound is searched for as a tentatively identified compound.

† - These compounds are unstable under normal conditions. As per EPA Method 624 guideline, the reported values are estimates.

\*1 - Previously reported as: Bis(2-chloroisopropyl) ether

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

**MARTIN WAY RECLAIMED WATER PLANT  
CLASS A WATER  
2025**

**TABLE II, 40 CFR Part 122, ORGANICS, PRIORITY POLLUTANTS**

VOLATILE ORGANIC COMPOUNDS						SEMI-VOLATILE ORGANIC COMPOUNDS										ORGANOCHLORINE PESTICIDES							
METHOD EPA 624	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 625	SAMPLE DATE 08/07/25					METHOD EPA 608	SAMPLE DATE 08/07/25				
	ANALYTE	CAS #	DL	QL	RDL-RQL		µg/L	ANALYTE	CAS #	DL	QL		RDL-RQL	µg/L	ANALYTE	CAS	DL		QL	RDL-RQL	ug/L	ANALYTE	CAS
Chloromethane	74873	0.060	5.0	1.0 - 2.0	0.060 U	1,2,4-Trichlorobenzene	120821	0.034	0.81	1.9 - 5.7	0.034 U	Bis(2-ethylhexyl) Phthalate	117817	0.59	0.81	2.5 - 7.5	0.59 U	alpha-BHC	319846	9.4	0.51	3.0 - 9.0	9.4 U
Vinyl Chloride	75014	0.090	5.0	1.0 - 2.0	0.090 U	2,4,6-Trichlorophenol	88062	0.31	0.81	2.7 - 8.1	0.31 U	Butyl Benzyl Phthalate	85687	0.79	0.81	2.5 - 7.5	0.79 U	beta-BHC	319857	42	42	6.0 - 18	42 U
Bromomethane	74839	0.090	5.0	5.0 - 10.0	0.090 U	2,4-Dichlorophenol	120832	0.11	0.81	2.7 - 8.1	0.11 U	Chrysene	218019	0.080	0.81	2.5 - 7.5	0.080 U	gamma-BHC (Lindane)	58899	9.4	0.67	4.0 - 12	9.4 U
Chloroethane	75003	0.10	5.0	1.0 - 2.0	0.10 U	2,4-Dimethylphenol	105679	0.20	0.81	2.7 - 8.1	0.20 U	Dibenz(a,h)acridine*	226368	-	2.0	2.5 - 10.0	2.0 U	delta-BHC	319868	9.4	0.46	9.0 - 27	9.4 U
1,1-Dichloroethene	75354	0.080	5.0	2.8 - 8.4	0.080 U	2,4-Dinitrophenol	51285	1.8	4.1	42 - 126	1.8 U	Dibenz(a,h)anthracene	53703	0.15	0.81	2.5 - 7.5	0.15 U	Heptachlor	76448	9.4	0.51	3.0 - 9.0	9.4 U
Methylene Chloride	75092	0.30	5.0	2.8 - 8.4	0.30 U	2,4-Dinitrotoluene	121142	0.19	0.81	5.7 - 17.1	0.19 U	Dibenz(a,i)acridine*	224420	-	2.0	2.5 - 10.0	2.0 U	<b>Aldrin</b>	309002	9.4	0.49	4.0 - 12	<b>5.0 J</b>
trans-1,2-Dichloroethene	156605	0.070	5.0	1.6 - 4.8	0.070 U	2,6-Dinitrotoluene	606202	0.17	0.81	1.9 - 5.7	0.17 U	Dibenzo(a,e)pyrene*	192654	-	2.0	2.5 - 10.0	2.0 U	Heptachlor Epoxide	1024573	9.4	2.2	83 - 249	9.4 U
1,1-Dichloroethane	75343	0.070	5.0	1.0 - 2.0	0.070 U	2-Chloronaphthalene	91587	0.039	0.81	1.9 - 5.7	0.039 U	Dibenzo(a,h)pyrene*	189640	-	2.0	2.5 - 10.0	2.0 U	Endosulfan I	959988	9.4	3.2	14 - 42	9.4 U
<b>Chloroform</b>	67663	0.070	5.0	1.6 - 4.8	<b>22</b>	2-Chlorophenol	95578	0.058	0.81	3.3 - 9.9	0.058 U	Dibenzo(a,i)pyrene*	189559	-	2.0	1.3 - 5.0	2.0 U	Dieldrin	60571	9.4	0.52	2.0 - 6.0	9.4 U
1,1,1-Trichloroethane (TCA)	71556	0.070	5.0	3.8 - 11.4	0.070 U	2-Methyl-4,6-dinitrophenol	534521	1.7	2.0	24 - 72	1.7 U	Diethyl Phthalate	84662	0.066	0.81	1.9 - 5.7	0.066 U	4,4'-DDE	72559	9.4	0.74	4.0 - 12	9.4 U
Carbon Tetrachloride	56235	0.20	5.0	2.8 - 8.4	0.20 U	2-Nitrophenol	88755	0.087	0.81	3.6 - 10.8	0.087 U	Dimethyl Phthalate	131113	0.069	0.81	1.6 - 4.8	0.069 U	Endrin	72208	9.4	0.53	6.0 - 18	9.4 U
Benzene	71432	0.060	5.0	4.4 - 13.2	0.060 U	3,3'-Dichlorobenzidine	91941	0.091	0.81	16.5 - 49.5	0.091 U	Di-n-butyl Phthalate	84742	0.74	0.81	2.5 - 7.5	0.74 U	Endosulfan II	33213659	9.4	0.88	4.0 - 12	9.4 U
1,2-Dichloroethane (EDC)	107062	0.060	5.0	2.8 - 8.4	0.060 U	3-Methylcholanthrene*	56495	-	2.0	2.0 - 8.0	2.0 U	Di-n-octyl Phthalate	117840	0.14	0.81	2.5 - 7.5	0.14 U	4,4'-DDD	72548	9.4	0.50	11 - 33	9.4 U
Trichloroethene (TCE)	79016	0.080	5.0	1.9 - 5.7	0.080 U	4-Bromophenyl Phenyl Ether	101553	0.057	0.81	1.9 - 5.7	0.057 U	Fluoranthene	206440	0.070	0.81	2.2 - 6.6	0.070 U	Endrin Aldehyde	7421934	9.4	5.1	23 - 70	9.4 U
1,2-Dichloropropane	78875	0.070	5.0	6.0 - 18.0	0.070 U	4-Chloro-3-methylphenol	59507	0.18	0.81	3.0 - 9.0	0.18 U	Fluorene	86737	0.036	0.81	1.9 - 5.7	0.036 U	Endosulfan Sulfate	1031078	9.4	0.36	66 - 198	9.4 U
<b>Bromodichloromethane</b>	75274	0.20	5.0	2.2 - 6.6	<b>3.1 J</b>	4-Chlorophenyl Phenyl Ether	7005723	0.051	0.81	4.2 - 12.6	0.051 U	Hexachlorobenzene	118741	0.042	0.81	1.9 - 5.7	0.042 U	4,4'-DDT	50293	9.4	0.77	12 - 36	9.4 U
2-Chloroethyl Vinyl Ether	110758	0.20	10	1.0 - 2.0	0.20 U	4-Nitrophenol	100027	1.8	2.0	2.4 - 7.2	1.8 U	Hexachlorobutadiene	87683	0.22	0.81	0.9 - 2.7	0.22 U	Toxaphene	8001352	470	56	0.24 - 0.5	470 U
Trans-1,3-Dichloropropene	10061026	0.090	5.0	1.0 - 2.0	0.090 U	Acenaphthene	83329	0.038	0.81	1.9 - 5.7	0.038 U	Hexachlorocyclopentadiene	77474	1.2	4.1	2.0 - 4.0	1.2 U	Chlordane	57749	190	29	14 - 42	190 U
Toluene	108883	0.070	5.0	6.0 - 18.0	0.070 U	Acenaphthylene	208968	0.053	0.81	3.5 - 10.5	0.053 U	Hexachloroethane	67721	0.21	0.81	1.6 - 4.8	0.21 U	<b>POLYCHLORINATED BIPHENYLS (PCBs)</b>					
cis-1,3-Dichloropropene	542756	0.090	5.0	5.0 - 15.0	0.090 U	Anthracene	120127	0.12	0.81	1.9 - 5.7	0.12 U	Indeno(1,2,3-cd)pyrene	193395	0.20	0.81	3.7 - 11.1	0.20 U						
1,1,2-Trichloroethane	79005	0.060	5.0	5.0 - 15.0	0.060 U	Azobenzene†	122667	0.083	0.81	5.0 - 20	0.083 U	Isophorone	78591	0.17	0.81	2.2 - 6.6	0.17 U	METHOD EPA 3520C/608					
Tetrachloroethene (PCE)	127184	0.050	5.0	4.1 - 12.3	0.050 U	Benz(a)anthracene	56553	0.061	0.81	7.8 - 23.4	0.061 U	Naphthalene	91203	0.039	0.81	1.6 - 4.8	0.039 U						
Dibromochloromethane	124481	0.20	5.0	3.1 - 9.3	0.20 U	Benzidine	92875	1.9	2.0	44 - 132	1.9 U	Nitrobenzene	98953	0.15	0.81	1.9 - 5.7	0.15 U	ANALYTE	CAS	DL	QL	RDL-RQL	ng/L
Chlorobenzene	108907	0.050	5.0	6.0 - 18.0	0.050 U	Benzo(a)pyrene	50328	0.065	0.81	2.5 - 7.5	0.065 U	N-Nitrosodimethylamine	62759	0.28	0.81	2.0 - 4.0	0.28 U	Aroclor-1016	12674112	100	19	0.065 - 0.195	100 U
Ethylbenzene	100414	0.030	5.0	7.2 - 21.6	0.030 U	Benzo(g,h,i)perylene	191242	0.15	0.81	4.1 - 12.3	0.15 U	N-Nitrosodi-n-propylamine	621647	0.15	0.81	0.5 - 1.0	0.15 U	Aroclor-1221	11104282	100	19	0.065 - 0.195	100 U
Bromoform	75252	0.40	5.0	4.7 - 14.1	0.40 U	Bis(2-chloroethoxy)methane	111911	0.053	0.81	5.3 - 15.9	0.053 U	N-Nitrosodiphenylamine	86306	0.083	0.81	1.0 - 2.0	0.083 U	Aroclor-1232	11141165	100	19	0.065 - 0.195	100 U
1,1,2,2-Tetrachloroethane	79345	0.080	5.0	6.9 - 20.7	0.080 U	Bis(2-chloroethyl) Ether	111444	0.067	0.81	5.7 - 17.1	0.067 U	Pentachlorophenol	87865	0.50	2.0	3.6 - 10.8	0.50 U	Aroclor-1242	53469219	100	19	0.065 - 0.195	100 U
1,3-Dichlorobenzene	541731	0.060	5.0	1.9 - 7.6	0.060 U	Bis(2-Chloro-1-Methylethyl) Ether *	108601	0.047	0.81	5.7 - 17.1	0.047 U	Perylene*	198550	-	0.81	1.9 - 7.6	0.81 U	Aroclor-1248	12672296	100	19	0.065 - 0.195	100 U
<b>1,4-Dichlorobenzene</b>	106467	0.090	5.0	4.4 - 17.6	<b>0.12 J</b>	Benzo(b)fluoranthene	205992	0.056	0.81	0.8 - 1.6	0.056 U	Phenanthrene	85018	0.034	0.81	5.4 - 16.2	0.034 U	Aroclor-1254	11097691	100	24	0.065 - 0.195	100 U
<b>1,2-Dichlorobenzene</b>	95501	0.070	5.0	1.9 - 7.6	<b>0.060</b>	Benzo(k)fluoranthene	207089	0.081	0.81	0.8 - 1.6	0.081 U	Phenol	108952	0.022	0.81	1.5 - 4.5	0.022 U	Aroclor-1260	11096825	100	24	0.065 - 0.195	100 U
Acrolein†	107028	2.0	50	5 - 10	2.0 U							Pyrene	129000	0.092	0.81	1.9 - 5.7	0.092 U						
Acrylonitrile†	107131	0.20	100	1.0 - 2.0	0.20 U							† - 1,2-Diphenylhydrazine is reported as Azobenzene											

Analyses performed by ALS Environmental (formerly Columbia Analytical, Inc.), 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

\* - This compound is searched for as a tentatively identified compound.

\*1 - Previously reported as: Bis(2-chloroisopropyl) ether

## LOCAL LIMIT EVALUATION

Total (ATF): 12.00 MGD				Domestic (ADF): 7.04 MGD				Comm/Industrial (AIF): 2.42 MGD				I&I (AIIF) <sup>4</sup> : 2.54 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	20.01	0.17	0.00166	0.000970	0.00113	36.7	0.17	0.057	0.086	4.70	1.82	36.53	36.64	99.70
Cadmium	0.2	20.01	0.013	0.00013	0.000159	0.00014	36.7	0.013	0.009	0.0004	4.70	0.009	36.68	36.69	99.99
Chromium	1.0	100.05	0.15	0.00147	0.00127	0.00170	183	0.15	0.075	0.037	23.51	0.16	183.33	183.41	99.96
Copper	0.5	50.02	4.78	0.04773	0.0861	0.04231	91.7	4.78	5.05	-1.17	11.76	-9.98	86.96	86.69	100.32
Lead	0.4	40.02	0.16	0.00161	0.00107	0.00204	73.4	0.16	0.063	0.055	9.41	0.59	73.23	73.33	99.87
Mercury	0.05	5.00	0.0028	0.00003	0.000026	0.00004	9.17	0.0028	0.0015	0.0004	1.18	0.04	9.17	9.17	99.99
Nickel	0.5	50.02	0.29	0.00292	0.00191	0.00205	91.7	0.29	0.11	0.137	11.76	1.16	91.45	91.63	99.80
Silver	0.2	20.01	0.030	0.00030	0.000131	0.00047	36.7	0.030	0.0077	0.012	4.70	0.26	36.67	36.69	99.94
Zinc	1.0	100.05	12.70	0.12691	0.127	0.09861	183	12.7	7.43	3.18	23.51	13.52	170.78	176.05	97.01

<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 2.54 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 12.00 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.
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.
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(s)</b>	<b>Inspected Y/N</b>	<b>Permitted Y/N</b>	<b>Comments</b>
Alaffia	N/A	2841	Y	N	Soap manufacturer. Inspected in 2015 and 2016.
Amcors Rigid Plastics	N/A	3085	Y	N	Manufacturer of polyethylene terephthalate (PET) packaging. Inspected in 2011, and 2018.
Artizen Cannabis Company	N/A	0139	Y	N	Cannabis producer/processor. Inspected in 2022.
Border States Electric	N/A	5084	Y	N	Electrical supply warehouse. Inspected in 2024.
Capital Campus Powerhouse and Heating Plant	N/A	4911	Y	N	Operates large boilers for heating. Inspected in 2024.
Capital Machine	N/A	3599	Y	N	Machine shop, and metal fabricator. Inspected in 2019.
Capital Medical Center	N/A	8062	Y	N	Hospital. Inspected in 2019.
Cardinal CG Company	N/A	3231	Y	N	Manufacturer of coated glass panels. Inspected in 2010, and 2019.
C.T. Specialties	N/A	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	N/A	3599	Y	N	Machine shop, and metal fabricator. Inspected in 2019.
Empire Packing	N/A	5147	Y	N	Meat packaging plant. Inspected in 2022.
Flair Packaging	N/A	3089	Y	N	Plastic container manufacturer. Inspected in 2022.
Forever Powder Coating	N/A	3479	Y	N	Powder coater. No core metal finishing is performed onsite. Inspected in 2018.
Four Star Accessory Overhaul	N/A	3724	Y	N	Aircraft engine repair shop. Inspected in 2012, and 2019.

INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS					
Name of Industry	Permit Number	SIC Code(s)	Inspected Y/N	Permitted Y/N	Comments
Georgia-Pacific Corrugated LLC	OL-001	2653	Y	Y	Corrugated cardboard container manufacturer.
Girard Wood Products	N/A	2448	Y	N	Wood pallet recycler. Inspected in 2022.
Glacken Fabrication	N/A	3444	Y	N	Machine shop, and metal fabricator. Inspected in 2024.
Grass Roots Pharmacy	N/A	0139	Y	N	Cannabis producer/processor. Inspected in 2025.
Harmony Farms	N/A	0139	Y	N	Cannabis producer/processor. Inspected in 2021.
H2O Jet, Inc.	N/A	3541	Y	N	Pump distributor. Inspected in 2019.
Hauled Wastewater	N/A	4212	N/A	Y	STEP system haulers; portable toilet waste haulers, carpet cleaners, greywater dischargers, and mobile food units.
Hella Loud	N/A	0139	Y	N	Cannabis producer/processor. Inspected in 2022.
Heritage Distillery	N/A	2085	Y	N	Alcoholic beverage blending.
Home Depot by DHL	N/A	4225	Y	N	Distribution warehouse. Inspected in 2022.
Home Depot #5650 Distribution Center	N/A	4225	Y	N	Distribution warehouse. Inspected in 2022.
Hummingbird Precision Machine Co.	N/A	3599	Y	N	Machine shop, and metal fabricator. Inspected in 2022.
Ilk Lodge	N/A	2082	Y	N	Microbrewery - Inspected in 2024.
International Paper Company	LA-003	2653	Y	Y	Corrugated cardboard container manufacturer.
I.P. Callison & Sons IPC	N/A	2899	Y	N	Mint oils, flavors, & mint-related ingredients supplier. Inspected in 2010, and 2025.

INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS					
Name of Industry	Permit Number	SIC Code(s)	Inspected Y/N	Permitted Y/N	Comments
Intercity Transit	N/A	4111	Y	N	Bus fleet maintenance and washing. Inspected in 2019, and 2023.
Kaiser Permanente Olympia Medical Center	N/A	8011	Y	N	Medical center. Inspected in 2019.
Kloeckner Metals Corp	N/A	5051	Y	N	Metal milling, and laser cutting. Inspected in 2019.
Magic Kombucha	N/A	2086	Y	N	Kombucha manufacturer. Inspected in 2023.
Mission Glass LLC	N/A	1793	Y	N	Window assembly. Inspected in 2019.
Mutual Materials Co	N/A	3271	Y	N	Concrete paver manufacturer. Inspected in 2019.
NW Welding and Fabrication	N/A	3599	Y	N	Welding and metal fabricator. Inspected in 2019.
Olympia Regional Airport	N/A	4581	Y	N	Regional Airport. Inspected in 2024.
Port of Olympia	MIU-OL-003	4491	Y	Y	Vehicle wash racks, stormwater treatment facility, decant facility. Renewed discharge permit in 2022.
Powerclean	N/A	7349	N	N	Restaurant fume hood cleaning company.
PR Systems Inc.	N/A	1611	Y	N	Asphalt recycling company. Inspected in 2017 and 2025.
Providence St. Peter's Hospital	N/A	8062	N	N	Hospital. Inspected in 2019.
Roy's Designs, Inc.	N/A	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/A	3993	N	N	Sign manufacturing company.

INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS					
Name of Industry	Permit Number	SIC Code(s)	Inspected Y/N	Permitted Y/N	Comments
Sherwood Forest Farms	N/A	0191 7389 2899	Y	N	Christmas wreath manufacturer. Inspected in 2022.
Shoebox Spirits	N/A	2085	N	N	Distillery.
Sound Sleep Products	N/A	5021	Y	N	Mattress manufacturer. Inspected in 2025.
South Puget Sound Community College	N/A	8221	Y	N	Food service, and dental school. Inspected in 2022.
South Puget Sound Community College Brewing and Distilling	N/A	8221	Y	N	Distillery. Inspected in 2025.
Target Warehouse	N/A	5099	Y	N	Distribution warehouse, battery wash, and wash pad. Inspected in 2016, and 2019.
The Evergreen State Community College	N/A	8221	Y	N	State college campus. Inspected in 2016, and 2019.
Three Magnets Brewery	N/A	2082	N	N	Microbrewery and restaurant - surveyed in 2014.
Top Rung Brewery	N/A	2082	Y	N	Microbrewery - Inspected in 2015.
Tops Countertops	N/A	1743 3281	Y	N	Stone countertop manufacturer. Inspected in 2021, 2022, and 2024.
Tri-City Meats	N/A	2011 2013	Y	N	Meat packaging plant. Inspected in 2022.
Valvoline Instant Oil Change	N/A	7549	Y	N	Automobile oil change facility. Inspected in 2022.
Washington State Department of Transportation	N/A	4173	Y	N	Vehicle maintenance facility. Inspected in 2021.
Western Superior Structural	N/A	3441	Y	N	Metal Fabricator. Inspected in 2025.
Western Transfer	N/A	4213	Y	N	Moving Company/Storage Inspection in 2025.

INDUSTRIAL USER SURVEY MINOR INDUSTRIAL USERS					
Name of Industry	Permit Number	SIC Code(s)	Inspected Y/N	Permitted Y/N	Comments
Whole Foods Distribution Center	N/A	4222	Y	N	Warehouse distribution center for Whole Foods. Inspected in 2022. LOTT issued discharge permit for spill prevention in 2023. The permit was cancelled in 2024 due to elimination of spill potential.
World Class Distribution Inc. Site A	N/A	4222	Y	N	Warehouse distribution center for Trader Joe's. Inspected in 2024.
World Class Distribution Inc. Site B	N/A	4222	Y	N	Warehouse distribution center for Trader Joe's. Inspected in 2018, and 2025.
Zeigler's Welding Inc.	N/A	7692	Y	N	Welding and metal fabricator. Inspected in 2019.

INDUSTRIAL USER SURVEY OTHER COMMERCIAL USERS		
Commercial User Type	Number	Comments
Brewed/fermented beverage production	18	Includes breweries, cideries, distilleries, and kombucha production.
Cannabis	22	Includes growing and processing facilities.
Cleaning services	32	Includes carpet cleaning companies, and custodial services.
Dental	125	Includes dental offices subject to dental amalgam rule, exempt facilities, and dental laboratories.
Food Service	822	Includes restaurants, grocery stores, hotels, schools, convalescent homes, and houses of worship.
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.

<b>INDUSTRIAL USER SURVEY OTHER COMMERCIAL USERS</b>		
<b>Commercial User Type</b>	<b>Number</b>	<b>Comments</b>
Medical	409	Includes; chiropractic, convalescent homes, dialysis centers, funeral services, general practitioners, hospitals, imaging/radiology centers, laboratories, massage therapists, pharmacies, physical therapists, psychologists, 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	210	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 first receives a survey form so we can identify any waste streams that might affect the POTW. LOTT uses the Department of Ecology’s standard survey form for potential categorical and significant industrial users.

For minor industrial users, we revise the generic form to include industry-specific questions. To do this, we review EPA guidance, look at forms from other municipalities, and consult with pretreatment professionals online to gather useful questions.

Information from these surveys is shared with our Partners and added to our database. If a business appears likely to discharge harmful or dangerous waste, we provide BMPs and/or conduct an inspection.

We use BMPs developed by the Department of Ecology and other municipalities as templates. When appropriate, we tailor these BMPs based on information from surveys and inspections. LOTT provides the final BMPs to businesses during inspections or by mail.

### SIGNIFICANT INDUSTRIAL USER 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	12/20/25	12/20/30	P- 1/Year S- Variable	F - 0 L - 0 P - 0 S - 0						
2. Crown Cork & Seal Company, Inc.	03/05/21	03/05/26	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 0			N			Failed to submit results for BOD, TSS and Hg.
3. Pepsi Northwest Beverages, LLC	09/18/25	09/18/30	P- 1/Year S- 12/Year	F - 0 L - 0 P - 0 S - 0						
4. Thurston County Waste & Recovery Center	09/29/22	09/28/27	P- 1/Year S- 12/Year	F - 0 L - 2 P - 0 S - 0		N				Failed to submit results for TSS.

<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.

## NON SIGNIFICANT CATEGORICAL INDUSTRIAL USER 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 - 0 L - 0 P - 0 S - 0					
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					
4. Winsor Fireform, LLC	11/31/2023	11/31/2028	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**

2025			JAN	FEB	MAR	APR	MAY		JUN	JUL	AUG	SEP	OCT	NOV	DEC
Date DMR Received			2/10/25	3/11/25	4/8/25	5/9/25	6/13/25	5/27/25	7/9/25	8/12/25	9/12/25	10/14/25	11/12/25	12/15/25	1/8/25
Parameter	Units	Local Limit						LOTT							
Flow (max)	gpd	<b>16,000</b>	5082	5082	5082	10,164	10,164		10,164	10,164	5082	5082	10164	10164	10164
Flow (ave)	gpd	<b>11,000</b>	3607	3267	4262	5251	3607		4066	4098	3279	4235	4754	4066	3934
BOD (ave)	mg/L	<b>N/A</b>	650	630	313	730	510	<b>1446</b>	603	287	258	360	500	173	577
TSS (ave)	mg/L	<b>N/A</b>	122	82	59	28	50	<b>97.0</b>	12	15	35	56	39	74	69
Ammonia	mg/L	<b>N/A</b>	60	96	36	34	65	<b>47.5</b>	72	44	48	61	72	31	101
pH (min)	SU	<b>5.0</b>	6.01	5.94	6.09	6.1	6.30	<b>7.12</b>	6.46	6.02	6.27	6.38	6.18	6.39	5.99
pH (max)	SU	<b>11.0</b>	8.83	7.78	7.94	9.12	7.39	<b>7.12</b>	7.67	8.17	7.12	9.01	7.71	7.38	8.70
FOG-T (HEM)	mg/L	<b>N/A</b>	4.9 U	4.8 U	4.9 U	4.8 U	4.9 U	<b>3.4 J</b>	5.6	4.8 U	4.8 U	4.8	4.9 U	4.8 U	4.8 U
FOG-Polar	mg/L	<b>300</b>	0.0 J	0.0 J	0.0 J	0.0 J	0.0 J	<b>1.6 J</b>	0.8 J	0.0 J	0.0 J	0.0 J	0.0 J	0.0 J	0.00
FOG-NP (SGT)	mg/L	<b>100</b>	4.9 U	4.8 U	4.9 U	4.8 U	4.9 U	<b>1.8 J</b>	4.8 U	4.8 U	4.8 U	4.8	4.9 U	4.8 U	4.8 U
Arsenic	mg/L	<b>0.2</b>	NT	NT	NT	NT	0.0076	<b>0.0008 J</b>	NT	NT	NT	NT	NT	0.001 U	NT
Cadmium	mg/L	<b>0.2</b>	NT	NT	NT	NT	0.00040 U	<b>0.00003 J</b>	NT	NT	NT	NT	NT	0.001 U	NT
Chromium	mg/L	<b>1.0</b>	NT	NT	NT	NT	0.0010 U	<b>0.0007 J</b>	NT	NT	NT	NT	NT	0.002 U	NT
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT	NT
Copper	mg/L	<b>0.5</b>	NT	NT	NT	NT	0.10	<b>0.0191</b>	NT	NT	NT	NT	NT	0.0081	NT
Lead	mg/L	<b>0.4</b>	NT	NT	NT	NT	0.00050 U	<b>0.00019</b>	NT	NT	NT	NT	NT	0.001 U	NT
Mercury	mg/L	<b>0.05</b>	NT	NT	NT	NT	0.00030 U	<b>0.00043</b>	NT	NT	NT	NT	NT	0.0002	NT
Molybdenum	mg/L	<b>N/A</b>	NT	NT	NT	NT	0.11	<b>0.128</b>	NT	NT	NT	NT	NT	0.150	NT
Nickel	mg/L	<b>0.5</b>	NT	NT	NT	NT	0.0077	<b>0.0087</b>	NT	NT	NT	NT	NT	0.0068	NT
Selenium	mg/L	<b>N/A</b>	NT	NT	NT	NT	0.0080 U	<b>0.0012 U</b>	NT	NT	NT	NT	NT	0.002 U	NT
Silver	mg/L	<b>0.2</b>	NT	NT	NT	NT	0.00040 U	<b>0.00003 U</b>	NT	NT	NT	NT	NT	0.001 U	NT
Zinc	mg/L	<b>1.0</b>	NT	NT	NT	NT	0.022	<b>0.027</b>	NT	NT	NT	NT	NT	0.020 U	NT
CN, total	mg/L	<b>0.64</b>	NT	NT	NT	NT	0.024	<b>0.027</b>	NT	NT	NT	NT	NT	0.03	NT
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT	NT

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

**INTERNATIONAL PAPER COMPANY**

<b>2025</b>			JAN	FEB	MAR	APR	MAY	JUN		JUL	AUG	SEP	OCT	NOV	DEC
Date DMR Received			2/5/25	3/5/25	4/9/25	5/2/25	6/3/25	7/7/25	6/10/25	8/5/25	9/5/25	10/3/25	11/4/25	12/1/25	1/7/26
Parameter	Units	Local Limit							LOTT						
Flow (max)	gpd	<b>15,000</b>	8900	8000	8200	8400	8300	7400		14800	11595	8400	9799	8200	13300
Flow (ave)	gpd	<b>11,000</b>	2772	2811	2974	2830	2823	2118		5764	2790	2577	2700	1857	2752
BOD (ave)	mg/L	<b>N/A</b>	443	215	803	240	344	963	<b>1153</b>	127	2587	1507	843	298	520
TSS (ave)	mg/L	<b>N/A</b>	22.83	10.7	14	17.8	13.67	12.8	<b>18.0</b>	44.7	32.7	53.3	11.3	9.8	19.3
Ammonia	mg/L	<b>N/A</b>	16.1	22.1	6.8	11.6	20.70	31.6	<b>57.1</b>	4.3	33.4	8.83	24.3	20.0	29.3
pH (min)	SU	<b>5.0</b>	7.4	7.6	7.2	7.6	7.3	6.5	<b>6.32</b>	6.6	6.3	7.1	6.8	7.4	7.3
pH (max)	SU	<b>11.0</b>	8.9	9.6	9.2	9.4	9.8	8.3	<b>7.82</b>	9.3	9.0	8.4	8.9	9.4	9.8
FOG-T (HEM)	mg/L	<b>N/A</b>	5.4 U	NT	NT	NT	NT	NT	<b>4.9 U</b>	NT	NT	5.0 U	NT	NT	NT
FOG-Polar	mg/L	<b>300</b>	0.00 J	NT	NT	NT	NT	NT	<b>0.00 J</b>	NT	NT	0.0 J	NT	NT	NT
FOG-NP (SGT)	mg/L	<b>100</b>	5.4 U	NT	NT	NT	NT	NT	<b>4.9 U</b>	NT	NT	5.0 U	NT	NT	NT
Arsenic	mg/L	<b>0.2</b>	0.00237	NT	NT	NT	NT	NT	<b>0.00121</b>	NT	NT	0.00306	NT	NT	NT
Cadmium	mg/L	<b>0.2</b>	0.000027	NT	NT	NT	NT	NT	<b>0.00003</b>	NT	NT	0.00005	NT	NT	NT
Chromium	mg/L	<b>1.0</b>	0.00070	NT	NT	NT	NT	NT	<b>0.00018</b>	NT	NT	0.00156	NT	NT	NT
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT
Copper	mg/L	<b>0.5</b>	0.186	NT	NT	NT	NT	NT	<b>0.0158</b>	NT	NT	0.129	NT	NT	NT
Lead	mg/L	<b>0.4</b>	0.00139	NT	NT	NT	NT	NT	<b>0.00056</b>	NT	NT	0.00232	NT	NT	NT
Mercury	mg/L	<b>0.05</b>	0.00020 U	NT	NT	NT	NT	NT	<b>0.000145</b>	NT	NT	0.137	NT	NT	NT
Molybdenum	mg/L	<b>N/A</b>	0.0268	NT	NT	NT	NT	NT	<b>0.0979</b>	NT	NT	0.137	NT	NT	NT
Nickel	mg/L	<b>0.5</b>	0.00463	NT	NT	NT	NT	NT	<b>0.0122</b>	NT	NT	0.00996	NT	NT	NT
Selenium	mg/L	<b>N/A</b>	0.0010	NT	NT	NT	NT	NT	<b>0.00020</b>	NT	NT	0.00100	NT	NT	NT
Silver	mg/L	<b>0.2</b>	0.000082	NT	NT	NT	NT	NT	<b>0.00001</b>	NT	NT	0.00010	NT	NT	NT
Zinc	mg/L	<b>1.0</b>	0.0637	NT	NT	NT	NT	NT	<b>0.0169</b>	NT	NT	0.126	NT	NT	NT
CN, total	mg/L	<b>0.64</b>	0.20 U	NT	NT	NT	NT	NT	<b>0.002 J</b>	NT	NT	0.020	NT	NT	NT
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT

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**

2025			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			2/14/25	3/17/25	4/14/25		5/12/25	6/13/25	5/22/25	7/15/25		8/13/25	9/15/25	10/13/25		11/14/25	12/15/25	1/15/26	
Parameter	Units	40 CFR Part 465, Subpart D				10/24-3/25		LOTT			1/25-6/25				4/25-9/25				7/25-12/25
Chromium (max)	gm/mmcans	36.92	0.05	0.01	0.01	NO	0.02	0.0126		0.02	NO	0.01	0.02	0.04	NO	0.03	0.01	0.008	NO
Chromium (monthly ave)	gm/mmcans	15.10	0.05	0.01	0.01	NO	0.02	0.0116		0.02	NO	0.01	0.01	0.04	NO	0.03	0.01	0.008	NO
Copper (max)	gm/mmcans	159.41	0.32	0.02	0.03	NO	0.15	0.07		0.02	NO	0.02	0.02	0.02	NO	0.02	0.01	0.039	NO
Copper (monthly average)	gm/mmcans	83.90	0.32	0.02	0.03	NO	0.15	0.06		0.02	NO	0.02	0.02	0.02	NO	0.02	0.01	0.039	NO
Zinc (max)	gm/mmcans	122.49	1.69	0.47	2.57	NO	2.30	2.02		1.38	NO	1.28	1.23	1.68	NO	1.86	1.08	1.49	NO
Zinc (monthly average)	gm/mmcans	51.18	1.69	0.47	2.57	NO	2.30	1.64		1.38	NO	1.28	1.23	1.68	NO	1.86	1.08	1.49	NO
Fluoride (max)	gm/mmcans	4,992.05	403	519	397	NO	365	176		237	NO	184	157	303	NO	156.74	118.69	73.3	NO
Fluoride (monthly ave)	gm/mmcans	2,214.96	403	519	397	NO	365	256		237	NO	184	157	303	NO	156.74	118.69	73.3	NO
Phosphorus (max)	gm/mmcans	1,401.13	1.07	0.80	0.82	NO	2.34	5.88		2.13	NO	3.27	2.64	2.37	NO	0.90	0.86	1.13	NO
Phosphorus (monthly ave)	gm/mmcans	573.04	1.07	0.80	0.82	NO	2.34	3.91		2.13	NO	3.27	2.64	2.37	NO	0.90	0.86	1.13	NO
Manganese (max)	gm/mmcans	57.05	16.11	7.32	18.00	NO	23.42	17.22		16.23	NO	11.00	11.50	12.94	NO	12.48	14.84	13.1	NO
Manganese (monthly ave)	gm/mmcans	24.33	16.11	7.32	18.00	NO	23.42	14.8		16.23	NO	11.00	11.50	12.94	NO	12.48	14.84	13.1	NO
Oil & Grease (max)*	gm/mmcans	1,678.00	126.2	28.32	127.07	NO	225	61.71		144.27	NO	140	135	132	NO	139.32	129.48	31	NO
Oil & Grease (monthly ave)*	gm/mmcans	1,006.80	126.2	28.32	127.07	NO	225	54.37		144.27	NO	140	135	132	NO	139.32	129.48	31.4	NO
Flow (max)	gpd	101000	69,484	58,399	67,197	NO	59,410	71,417		76,082	NO	78,333	71,783	72,911	NO	69510	70,356	85,864	NO
Flow (monthly ave)	gpd	90000	47,331	43,820	46,007	NO	90,000	57,181		57,128	NO	58,170	55,607	53,745	NO	55086	52,468	47,733	NO
Cans (max)	mg/L	N/A	7,936,378	8,185,338	8,001,341	NO	8,013,789	8,213,346		7,850,409	NO	8,229,295	8,291,924	8,257,692	NO	8,307,873	8,612,460	8070972	NO
Cans (monthly ave)	mg/L	N/A	6,671,438	7,027,994	6,577,664	NO	7,271,914	7,364,561		7,193,933	NO	7,406,209	7,506,546	7,387,706	NO	7,183,274	7,361,812	6902592	NO
pH (min)	SU	5.00	6.99	5.35	6.84	NO	6.90	6.80		6.89	NO	6.14	7.33	7.30	NO	6.8	8.42	7.16	NO
pH (max)	SU	11.00	9.93	10.68	9.75	NO	9.94	9.28		9.90	NO	9.33	9.80	9.87	NO	10.09	9.43	9.15	NO
Chromium (max)	mg/L	0.007	0.0017	0.00052 J	0.00043 J	NO	0.00038 J	0.00036 J	0.00043 J	0.00050 J	NO	0.00031 J	0.00053 J	0.0015	NO	0.00093 J	0.00054 U	0.00029 J	NO
Chromium (monthly ave)	mg/L	0.007	0.0017	0.00052 J	0.00043 J	NO	0.00038 J	0.00040 J		0.00050 J	NO	0.00031 J	0.00053 J	0.0015	NO	0.00093 J	0.00054 U	0.00029 J	NO
Copper (max)	mg/L	0.006	0.012	0.00096 J	0.00097 J	NO	0.0031	0.0025	0.0014	0.00079 J	NO	0.00060 U	0.00075 J	0.00060 U	NO	0.00068 J	0.00024 U	0.0015 J	NO
Copper (monthly average)	mg/L	0.006	0.012	0.00096 J	0.00097 J	NO	0.0031	0.0019		0.00079	NO	0.00060 U	0.00075 J	0.00060 U	NO	0.00068 J	0.00024 U	0.0015 J	NO
Zinc (max)	mg/L	0.006	0.063	0.020	0.097	NO	0.049	0.043	0.069	0.046	NO	0.043	0.044	0.061	NO	0.064	0.040	0.057	NO
Zinc (monthly average)	mg/L	0.006	0.063	0.020	0.097	NO	0.049	0.056		0.046	NO	0.043	0.044	0.061	NO	0.064	0.040	0.057	NO
Fluoride (max)	mg/L	0.200	15	22	15	NO	7.8	6.0	11.4	7.9	NO	6.2	5.6	11	NO	5.4	4.4	2.8	NO
Fluoride (monthly ave)	mg/L	0.200	15	22	15	NO	7.8	8.7		7.9	NO	6.2	5.6	11	NO	5.4	4.4	2.8	NO
Phosphorus (max)	mg/L	0.100	0.040 J	0.034 J	0.031 U	NO	0.050 U	0.20	0.066	0.071	NO	0.11	0.094	0.086	NO	0.031 J	0.032 U	0.043 J	NO
Phosphorus (monthly ave)	mg/L	0.100	0.040 J	0.034 J	0.031 U	NO	0.050 U	0.13		0.071	NO	0.11	0.094	0.086	NO	0.031 J	0.032 U	0.043 J	NO
Manganese (max)	mg/L	0.002	0.60	0.31	0.68	NO	0.50	0.42	0.586	0.54	NO	0.37	0.41	0.47	NO	0.43	0.55	0.50	NO
Manganese (monthly ave)	mg/L	0.002	0.60	0.31	0.68	NO	0.50	0.503		0.54	NO	0.37	0.41	0.47	NO	0.43	0.55	0.50	NO
Oil & Grease (SGT) (max)*	mg/L	5.0	4.7 U	1.2 U	4.8 U	NO	4.8 U	1.6	2.1 J	4.8	NO	4.7	4.8 U	4.8 U	NO	4.8 U	4.8 U	1.2 J	NO
Oil & Grease (SGT)(monthly ave)*	mg/L	5.0	4.7 U	1.2 U	4.8 U	NO	4.8 U	1.9		4.8	NO	4.7	4.8 U	4.8 U	NO	4.8 U	4.8 U	1.2 J	NO

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

2025			JAN	FEB	MAR	APR	MAY		JUN	JUL	AUG	SEP	OCT	NOV	DEC
Date DMR Received			2/14/25	3/17/25	4/14/25	5/12/25	6/13/25	5/22/25	7/15/25	8/13/25	9/15/25	10/13/25	11/14/25	12/15/25	1/15/26
Parameter	Units	Local Limit													
Flow (max)	gpd	<b>101,000</b>	69,484	58,399	67,197	59,410	71417		76,082	78,333	71,783	72,911	69,510	70,356	85,864
Flow monthly (ave)	gpd	<b>90,000</b>	47,331	43,820	46,007	90,000	57181		57,128	58,170	55607	53,745	55,086	52,468	47,733
BOD (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NT	NT	<b>229</b>	<b>NT</b>	NT	30	NT	NT	NT	NT
TSS (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NT	NT	<b>5.0</b>	<b>NT</b>	NT	4.8	NT	NT	NT	NT
Ammonia	mg/L	<b>N/A</b>	NT	NT	NT	NT	NT	<b>3.28</b>	NT	NT	NT	NT	NT	NT	NT
pH (min)	SU	<b>5.0</b>	6.99	5.35	6.84	6.90	6.80	<b>8.23</b>	6.89	6.14	7.33	7.30	6.80	8.42	7.16
pH (max)	SU	<b>11.0</b>	9.93	10.68	9.75	9.94	9.28	<b>8.23</b>	9.90	9.33	9.80	9.87	10.09	9.43	9.15
FOG-T (HEM)	mg/L	<b>N/A</b>	1.7 J	2.1 J	4.8 U	3.0 J	3.2	<b>3.3 J</b>	4.8 U	4.7 U	1.8 J	4.8 U	4.8 U	2.0 J	4.6 J
FOG-Polar	mg/L	<b>300</b>	-3.0 J	0.9 J	0.0 J	0.0 J	1.6 J	<b>1.2 J</b>	0.0 J	0.0 J	0.0 J	0.0 J	0.0 J	0.0 J	3.4 J
FOG-NP (SGT)	mg/L	<b>100</b>	4.7 U	1.20 U	4.8 U	4.8 J	1.6 J	<b>2.1 J</b>	4.8 U	4.7 J	4.8 U	4.8 U	4.8 U	4.8 J	1.2 J
Arsenic	mg/L	<b>0.2</b>	NT	NT	NT	NT	NT	<b>0.00029</b>	0.00046 J	NT	0.00049	NT	NT	NT	NT
Cadmium	mg/L	<b>0.2</b>	NT	NT	NT	NT	NT	<b>0.000172</b>	0.00010 J	NT	0.00021	NT	NT	NT	NT
Chromium	mg/L	<b>1.0</b>	0.0017	0.00052 J	0.00043 J	0.0004	0.00036	<b>0.00043</b>	0.0005	0.0003	0.00053	0.00150	0.00093	0.0005	0.0003
Chromium +6	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT	NT
Copper	mg/L	<b>0.5</b>	0.012	0.00096 J	0.00097 J	0.003	0.0025	<b>0.00139</b>	0.001	0.0020	0.00075	0.00060	0.0007	0.00024	0.002
Lead	mg/L	<b>0.4</b>	NT	NT	NT	NT	NT	<b>0.00758</b>	0.0055	NT	0.0087	NT	NT	NT	NT
Mercury	mg/L	<b>0.05</b>	NT	NT	NT	NT	NT	<b>0.000267</b>	<b>0.000077</b>	NT	0.00030	NT	NT	NT	NT
Molybdenum	mg/L	<b>N/A</b>	NT	NT	NT	NT	NT	<b>0.0171</b>	0.016	NT	NT	NT	NT	NT	NT
Nickel	mg/L	<b>0.5</b>	NT	NT	NT	NT	NT	<b>0.0779</b>	0.065	NT	0.068	NT	NT	NT	NT
Selenium	mg/L	<b>N/A</b>	NT	NT	NT	NT	NT	<b>0.0002</b>	0.0021 U	NT	0.0021	NT	NT	NT	NT
Silver	mg/L	<b>0.2</b>	NT	NT	NT	NT	NT	<b>0.000006</b>	0.000040	NT	0.00040	NT	NT	NT	NT
Zinc	mg/L	<b>1.0</b>	0.063	0.020	0.097	0.049	0.043	<b>0.0689</b>	0.046	0.043	0.044	0.061	0.064	0.040	0.057
CN, total	mg/L	<b>0.64</b>	0.020 U	0.02 U	NT	0.02 U	0.02 U	<b>0.003 J</b>	0.0063 J	NT	0.020	NT	NT	NT	NT
CN, free	mg/L	<b>0.25</b>	NT	NT	NT	NT	NT	<b>NT</b>	NT	NT	NT	NT	NT	NT	NT

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

**A & R AVIATION CATEGORICAL LIMITS**

2025			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			2/5/25	3/6/25	4/15/25		5/1/25	6/3/25	5/22/25	7/7/25		8/6/25	9/5/25	10/6/25		11/10/25	12/5/25	1/6/25	
Parameter	Units	40 CFR Part 433 Subpart A				10/24-3/25		LOTT			1/25-6/25				4/25-9/25				7/25-12/25
Cadmium Daily Max	mg/L	0.11	Zero Discharge	Zero Discharge	Zero Discharge	NO	Zero Discharge	0.00974	0.00353	Zero Discharge	NO	Zero Discharge	Zero Discharge	Zero Discharge	NO	Zero Discharge	Zero Discharge	0.00763	NO
Cadmium Monthly Average	mg/L	0.07				NO		0.00664	NO		0.00763				NO				
Chromium Daily Max	mg/L	2.77				NO		0.0243	0.0125		0.0122				NO				
Chromium Monthly Average	mg/L	1.71				NO		0.0184	0.0122		NO								
Copper Daily Max	mg/L	3.38				NO		0.245	0.106		0.134				NO				
Copper Monthly Average	mg/L	2.07				NO		0.176	0.134		NO								
Lead Daily Max	mg/L	0.69				NO		0.0142	0.00454		0.00647				NO				
Lead Monthly Average	mg/L	0.43				NO		0.0094	0.00647		NO								
Nickel Daily Max	mg/L	3.98				NO		0.0115	0.00869		0.00969				NO				
Nickel Monthly Average	mg/L	2.38				NO		0.0101	0.00969		NO								
Silver Daily Max	mg/L	0.43				NO		0.0011	0.000022		0.000048				NO				
Silver Monthly Average	mg/L	0.24				NO		0.0006	0.000048		NO								
Zinc Daily Max	mg/L	2.61				NO		0.446	0.162		0.29				NO				
Zinc Monthly Average	mg/L	1.48				NO		0.304	0.29		NO								
CN, Daily Max	mg/L	1.20				NO		0.040 U	0.0008		0.04				NO				
CN, Monthly Average	mg/L	0.65				NO		0.020 U	0.04		NO								
TTO	mg/L	2.13	NO	NT	ND	NT	NO												

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

**A & R AVIATION LOCAL LIMITS**

2025			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			2/5/25	3/6/25	4/15/25		5/1/25	6/3/25	5/22/25	7/7/25		8/6/25	9/5/25	10/6/25		11/10/25	12/5/25	1/6/25	
Parameter	Units	Local Limit				10/24-3/25		LOTT			1/25-6/25				4/25-9/25				7/25-12/25
Flow (max)	gpd	N/A	Zero Discharge	Zero Discharge	Zero Discharge	NO	Zero Discharge	257.1		Zero Discharge	NO	Zero Discharge	Zero Discharge	Zero Discharge	NO	Zero Discharge	Zero Discharge	262	NO
Flow (ave)	gpd	N/A				NO		242.6			NO				245			NO	
BOD (ave)	mg/L	N/A				NO		NT	12,343		NO				NT			NO	
TSS (ave)	mg/L	N/A				NO		NT	47		NO				NT			NO	
Ammonia	mg/L	N/A				NO		NT	0.00		NO				NT			NO	
pH (min)	SU	5.0				NO		5.59	7.52		NO				5.33			NO	
pH (max)	SU	11.0				NO		7.93	7.52		NO				6.14			NO	
FOG-T (HEM)	mg/L	N/A				NO		2.8 U	44.40		NO				50.7			NO	
FOG-Polar	mg/L	300				NO		0.0 U	41.90		NO				25.4			NO	
FOG-NP (SGT)	mg/L	100				NO		5.0 U	2.50		NO				25.3			NO	
Arsenic	lbs/day	0.002				NO		NT	0.00016		NO				NT			NO	
Cadmium	lbs/day	0.002				NO		0.00002	0.000007		NO				0.000016			NO	
Chromium	lbs/day	0.008				NO		0.000049	0.000025		NO				0.000025			NO	
Chromium +6	lbs/day	0.002				NO		NT	NT		NO				NT			NO	
Copper	lbs/day	0.004				NO		0.000496	0.000214		NO				0.000274			NO	
Lead	lbs/day	0.004				NO		0.000029	0.0000092		NO				0.0000132			NO	
Mercury	lbs/day	0.0004				NO		NT	0.00001042		NO				0.000011			NO	
Molybdenum	lbs/day	N/A				NO		NT	NT		NO				NT			NO	
Nickel	lbs/day	0.004				NO		0.000023	0.000018		NO				0.000020			NO	
Selenium	lbs/day	N/A				NO		NT	0.000006		NO				NT			NO	
Silver	lbs/day	0.002	NO	0.00000223	0.00000045	NO	0.00000098	NO											
Zinc	lbs/day	0.008	NO	0.000902	0.00033	NO	0.000593	NO											
CN, total	lbs/day	0.005	NO	0.000081 U	0.000002	NO	0.000082	NO											
CN, free	lbs/day	0.002	NO	NT	NT	NO	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**

2025				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				2/13/25	3/14/25	4/11/25		5/14/25	6/13/25	N/A		N/A	N/A	N/A		N/A	N/A	11/17/25	12/15/25	
Parameter	Units	Local Limit					10/24-3/25					1/25-6/25					4/25-9/25	LOTT		7/25-12/25
			001	Flow (max)	gpd	<b>100,000</b>	41,144	31,865	33,906	NO	33,433	17203	NT	NO	NT	NT	NT	NO	NT	NT
Flow (ave)	gpd	<b>50,000</b>		24,687	18,457	12,791	NO	6,782	1814	NT	NO	NT	NT	NT	NO	NT	NT		NT	NO
002	Flow (max)	gpd	<b>100,000</b>	1,309	1,593	607	NO	840	482	NT	NO	NT	NT	NT	NO	NT	NT		NT	NO
	Flow (ave)	gpd	<b>50,000</b>	264	363	310	NO	311	255	NT	NO	NT	NT	NT	NO	NT	NT		NT	NO
003	Flow (max)	gpd	<b>100,000</b>	773,454	32,172	34367	NO	33,802	17,503	1150	NO	600	587	1168	NO	9487	31,799		34790.30	NO
	Flow (ave)	gpd	<b>50,000</b>	24,950	18,820	13101	NO	7,094	2011	402.00	NO	334	335	425	NO	7810	20,927		28272.10	NO
	BOD (ave)	mg/L	<b>N/A</b>	40.3	29.7	25.7	NO	31	54.3	NT	NO	NT	NT	NT	NO	21	9.3	12.3	163	NO
	TSS (ave)	mg/L	<b>N/A</b>	23.0	16.0	15.7	NO	15	47.3	NT	NO	NT	NT	NT	NO	10.1	9.1	16.0	72.3	NO
	Ammonia	mg/L	<b>N/A</b>	18.13	28.6	28.0	NO	14.7	7.4	NT	NO	NT	NT	NT	NO	3.4	1.0	1.74	5.8	NO
	pH (min)	SU	<b>5.0</b>	7.18	7.19	6.90	NO	7.06	6.68	NT	NO	NT	NT	NT	NO	7.03	6.88	8.19	6.98	NO
	pH (max)	SU	<b>11.0</b>	7.83	7.76	7.43	NO	7.41	7.16	NT	NO	NT	NT	NT	NO	7.68	7.76	8.19	6.60	NO
	FOG-T (HEM)	mg/L	<b>N/A</b>	5.0 U	5.0 U	5.0 U	NO	5.0 U	5.0 U	NT	NO	NT	NT	NT	NO	4.9 U	4.9 U	2.5	3.6 J	NO
	FOG-Polar	mg/L	<b>300</b>	5.0 U	5.0 U	5.0 U	NO	5.0 U	5.0 U	NT	NO	NT	NT	NT	NO	4.9 U	4.9 U	1.0	3.6 J	NO
	FOG-NP (SGT)	mg/L	<b>100</b>	5.0 U	5.0 U	5.0 U	NO	5.0 U	5.0 U	NT	NO	NT	NT	NT	NO	4.9 U	4.9 U	1.5	1.2 U	NO
	Arsenic	mg/L	<b>0.2</b>	0.004166	0.005052	0.00375	NO	0.004262	0.00631	NT	NO	NT	NT	NT	NO	0.0055	0.0037	0.00391	0.0032	NO
	Cadmium	mg/L	<b>0.2</b>	0.000100 U	0.000100 U	0.000100 U	NO	0.00010	0.000100 U	NT	NO	NT	NT	NT	NO	0.00004	0.000046	0.000025	0.000088 J	NO
	Chromium	mg/L	<b>1.0</b>	0.002620	0.0024	0.00213	NO	0.00224	0.000500 U	NT	NO	NT	NT	NT	NO	0.00210	0.0018	0.00191	0.0030	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>	0.0219	0.0203	0.02179	NO	0.02167	0.03022	NT	NO	NT	NT	NT	NO	0.01400	0.010	0.0147	0.019	NO
	Lead	mg/L	<b>0.4</b>	0.001147	0.0011	0.00089	NO	0.00096	0.000552	NT	NO	NT	NT	NT	NO	0.00022	0.00050	0.00055	0.0017	NO
	Mercury	mg/L	<b>0.05</b>	0.000100 U	0.000100 U	0.000100 U	NO	0.00010	0.000100 U	NT	NO	NT	NT	NT	NO	0.00005	0.00012	0.0000522	0.000050 U	NO
	Molybdenum	mg/L	<b>N/A</b>	0.001029	0.00086	0.00077	NO	0.00091	0.001794	NT	NO	NT	NT	NT	NO	0.00100	0.00085	0.00072	0.00079	NO
	Nickel	mg/L	<b>0.5</b>	0.009172	0.0075	0.00663	NO	0.00778	0.002536	NT	NO	NT	NT	NT	NO	0.0110	0.0077	0.00882	0.0079	NO
	Selenium	mg/L	<b>N/A</b>	0.001939	0.0031	0.00256	NO	0.00264	0.00583	NT	NO	NT	NT	NT	NO	0.00210	0.00042	0.00020 U	0.0021	NO
Silver	mg/L	<b>0.2</b>	0.000200 U	0.000200 U	0.000200 U	NO	0.00020	0.000306	NT	NO	NT	NT	NT	NO	0.00040	0.00020	0.00001 U	0.00003 J	NO	
Zinc	mg/L	<b>1.0</b>	0.2468	0.1541	0.1401	NO	0.1527	0.1361	NT	NO	NT	NT	NT	NO	0.0920	0.051	0.0983	0.150	NO	
CN, total	mg/L	<b>0.64</b>	0.007	0.005 U	0.005 U	NO	0.005 U	0.005 U	NT	NO	NT	NT	NT	NO	0.0079 J	0.0083 J	0.0005 U	0.012	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

**PEPSI NORTHWEST BEVERAGES, LLC**

2025			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			2/4/25	3/5/25	4/9/25		5/7/25	6/3/25	7/7/25	<b>6/12/25</b>		8/4/25	9/9/25	10/6/25		11/4/25	12/2/25	1/6/26	
Parameter	Units	Local Limit				10/24-3/25					1/25-6/25				4/25-9/25				7/25-12/25
Flow (max)	gpd	198,000	180,828	182,016	178,008	NO	188,284	180,016	180,588		NO	181,936	180,492	180,312	NO	181,736	182,000	181,296	NO
Flow (ave)	gpd	<b>144,000</b>	115,217	126,083	122,239	NO	127,873	132,649	134,639		NO	124,263	132,674	89,379	NO	106,658	102,831	111,942	NO
BOD (ave)	mg/L	<b>N/A</b>	1756	1933	1737	NO	1930	2214	2227	<b>2615</b>	NO	2667	2751	1841	NO	1506	1893	1749	NO
TSS (ave)	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	NT	<b>65.5</b>	NO	NT	NT	NT	NO	NT	NT	NT	NO
Ammonia	mg/L	<b>N/A</b>	NT	NT	NT	NO	NT	NT	NT	<b>0.08</b>	NO	NT	NT	NT	NO	NT	NT	NT	NO
pH (min)	SU	<b>5.0</b>	5.78	5.77	5.80	NO	5.89	5.79	5.80	6.32	NO	5.78	5.79	5.80	NO	5.79	5.78	5.78	NO
pH (max)	SU	<b>11.0</b>	10.50	10.37	10.20	NO	10.78	10.40	10.60	6.32	NO	10.67	10.69	10.65	NO	10.61	9.75	10.78	NO
FOG-T (HEM)	mg/L	<b>N/A</b>	31	12	6.1	NO	29	13	25	<b>22.4</b>	NO	28	30	33	NO	6.3	13	11	NO
FOG-Polar	mg/L	<b>300</b>	15	5.7	6.1	NO	4.9 U	4.9 J	5.0 J	<b>6.4</b>	NO	7.0	8.0	8.0	NO	5.6 U	13	5.7 U	NO
FOG-NP (SGT)	mg/L	<b>100</b>	16	6.3	6.1	NO	28	8.0	20	<b>16.0</b>	NO	21	22	25	NO	5.6	5.6 U	11	NO
Arsenic	mg/L	<b>0.2</b>	NT	NT	0.0012	NO	NT	NT	NT	0.00113	NO	NT	NT	0.0013	NO	NT	NT	NT	NO
Cadmium	mg/L	<b>0.2</b>	NT	NT	0.00040 U	NO	NT	NT	NT	0.000006	NO	NT	NT	0.00040 U	NO	NT	NT	NT	NO
Chromium	mg/L	<b>1.0</b>	NT	NT	0.0024	NO	NT	NT	NT	0.00285	NO	NT	NT	0.0038	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	0.0077	NO	NT	NT	NT	0.0237	NO	NT	NT	0.016	NO	NT	NT	NT	NO
Lead	mg/L	<b>0.4</b>	NT	NT	0.00050 U	NO	NT	NT	NT	0.00132	NO	NT	NT	0.00071	NO	NT	NT	NT	NO
Mercury	mg/L	<b>0.05</b>	NT	NT	0.0015 U	NO	NT	NT	NT	<b>0.000055</b>	NO	NT	NT	0.00030 U	NO	NT	NT	NT	NO
Molybdenum	mg/L	<b>N/A</b>	NT	NT	0.00080 U	NO	NT	NT	NT	0.00049	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	0.00181	NO	NT	NT	0.0030	NO	NT	NT	NT	NO
Selenium	mg/L	<b>N/A</b>	NT	NT	0.0080 U	NO	NT	NT	NT	0.0002	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	0.000006	NO	NT	NT	0.00040 U	NO	NT	NT	NT	NO
Zinc	mg/L	<b>1.0</b>	NT	NT	0.027	NO	NT	NT	NT	0.0631	NO	NT	NT	0.061	NO	NT	NT	NT	NO
CN, total	mg/L	<b>0.64</b>	NT	NT	0.020 U	NO	NT	NT	NT	<b>0.0005 U</b>	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**

<b>AMERICAN BENCHMARK MACHINE WORKS</b>		<b>EARTH FRIENDLY PRODUCTS</b>		<b>J.R. SETINA MANUFACTURING</b>		<b>WINSOR FIREFORM</b>	
Date of annual facility inspection	Date annual certification received						
7/25/2025	1/26/2026	7/28/2025	2/1/2026	7/17/2025	1/27/2026	7/24/2025	1/20/2026

**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, 2025, to December 31, 2025
Total Significant Categorical IUs:	2
Total Significant Non-categorical IUs:	2
<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	1 / 1                      1 / 1
No. of SIUs meeting compliance schedule/no. required to meet schedule	0 / 0                      0 / 0
No. of SIUs in SNC (categorical & non-categorical)	0                              0
No. of SIUs not inspected or sampled	0                              0
No. of SIUs in SNC with standards and reporting	0                              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                              0/2
<b>III COMPLIANCE MONITORING PROGRAM</b>	
No. of SIUs without a permit	0
No. of SIU inspections conducted	4
No. of SIU sampling visits conducted	4
No. of SIU facilities sampled	4
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.)	2

2/25/26  
Date

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

# FOG

**FATS • OILS • GREASE**

## Avoid the FOG CLOG!



**Scrape Pans  
and Plates**



**Can the  
Grease**



**Catch the  
Scraps**



**Toss in  
the Trash**

# FATS, OILS & GREASE REGULATION UPDATES

## FACT SHEET

### Keeping Fats, Oils & Grease (FOG) out of the Sewer System

Food service establishments (FSEs) are required to control discharge of fats, oils and grease to the publicly owned sewer system. The LOTT Clean Water Alliance (LOTT) and its partner jurisdictions, the cities of Lacey, Olympia and Tumwater, and Thurston County, manage and operate the sewer system. LOTT has made changes to its discharge regulations and updated rules for grease interceptor maintenance.



*Grease-laden wastewater, generated when preparing food and washing dishes, can constrict or even block sewer lines if the wastewater is discharged directly to the sewer system.*

FSEs generate grease-laden wastewater when preparing food and washing dishes. If this wastewater is discharged directly to the sewer, grease can constrict or even block sewer lines, causing the sewer to overflow. This can disrupt business operations and create a hazard to public health and the environment.

### FOG Program Requirements & Updates

LOTT is required by the Washington State Department of Ecology (Ecology) to establish a program for managing fats, oils and grease. FOG programs help prevent grease-related sewer overflows by requiring commercial facilities that produce FOG to install and maintain grease interceptors. LOTT establishes rules for sewer discharge, which are included in partner jurisdiction sewer use ordinances. These rules ensure businesses maintain devices to remove grease and

prevent sewer overflows. Ecology reviews LOTT's program to ensure it meets federal Environmental Protection Agency (EPA) requirements and protects the wastewater collection system and treatment plants.

LOTT updated the rules for grease interceptor maintenance because prior regulations were ineffective. Prior to initiating these changes, LOTT inspected FSEs to observe how grease interceptors were maintained, and to identify common deficiencies. LOTT also reviewed sewer use ordinances from other Washington municipalities to develop a program based on proven methods.

***Food service establishments are required to control discharge of fats, oils and grease to the publicly owned sewer system. LOTT has made changes to its discharge regulations and updated rules for grease interceptor maintenance.***

## Changes to the Ordinance

The new rules establish required frequencies for cleaning grease interceptors. They would also allow cleaning frequencies to be adjusted according to the rate of grease build-up in the FSE's interceptor.

Changes include:

### Creating uniform standards that define how often a grease interceptor must be cleaned.

- FSEs must maintain their interceptor every 14, 30 or 90 days, depending on the size and type of interceptor.
- Hydromechanical grease interceptors (aka grease traps) must be cleaned every 14 days.
- Single-chamber high-capacity hydromechanical grease interceptors must be cleaned every 30 days.
- Multiple-chamber high-capacity hydromechanical grease interceptors, and large exterior grease interceptors (aka gravity grease interceptors) must be cleaned every 90 days.

### Defining cleaning standards.

- When an interceptor is pumped by a professional company, they must remove all contents including grease, water and food sediment.
- Businesses may self-clean small interceptors according to LOTT's self-cleaning methods.
- Cleaning frequencies can be increased or decreased based on how much grease and sediment fills the grease interceptor.

### Requiring businesses to maintain records and report maintenance activities.

- FSEs must maintain records and make them available to LOTT staff during inspections.
- FSEs must submit reports to LOTT when their grease interceptor is pumped.

### Prohibitions on the use of grease-dissolving additives, garbage grinders and dishwashers.

- The addition of grease-dissolving additives into an interceptor instead of maintenance is prohibited.
- Garbage grinders must be discharged to a gravity grease interceptor or be removed.
- Dishwashers installed after May 2025 may not be connected to a hydromechanical grease interceptor. They must discharge directly to the sewer or to a gravity grease interceptor.

## Pumper Program

LOTT is establishing a Pumper Program to streamline reporting requirements and ensure that FSEs can find a grease pumper that will clean an interceptor according to LOTT's standard. Pumpers would agree to clean grease interceptors according to LOTT's standards and would be allowed to submit required maintenance reports on behalf of the FSE.

The FSE is responsible for maintaining grease interceptors and submitting reports to LOTT. However, a pumper can help simplify the process.

## Facility Inspections

FSEs that regularly maintain their grease interceptor and comply with reporting requirements may be inspected less often than non-compliant facilities. LOTT can prioritize facility inspections for FSEs that are not submitting reports, an indication they might not be cleaning their interceptor.

*Good business practices result in cleaner waterways. LOTT and partner jurisdictions work with local businesses to promote clean water in our communities.*

## For More Information

- **LOTT's Pretreatment Regulations** are located on our website at [www.lottcleanwater.org/regulations](http://www.lottcleanwater.org/regulations).
- **For additional questions** about LOTT's Pretreatment Program, email [pretreatment@lottcleanwater.org](mailto:pretreatment@lottcleanwater.org) or call (360) 528-5728.

# Frequently Asked Questions

## What are Food Service Establishments (FSEs)?

FSEs include any type of nonresidential facility where food is prepared or served, including:

Restaurants	Grocery stores
Delis	Bakeries
School cafeterias	Assisted living centers
Hotels	Catering services
Food truck commissaries	Houses of worship

## What is the problem with grease in wastewater?

If greasy wastewater is discharged directly to the sewer, it can constrict or even block sewer lines, causing the sewer to overflow. This creates a hazard to public health and the environment and can subject LOTT to costly fines from the Department of Ecology.

## Will LOTT or the city pay for grease interceptor maintenance?

No, businesses are responsible for maintaining their grease interceptor, just as they must pay to install and maintain a dumpster for solid waste. The business that generates the grease pays the cost of grease management.

## Why can't I use enzymes?

Grease interceptors are not designed to work with enzymes. Their design is based on the fact that oil floats and solids sink in water. The addition of enzymes interferes with these operations and can discharge FOG to the public sewer.

## Why must garbage grinders be disconnected?

When garbage grinders discharge directly to the sewer, they introduce a large amount of FOG that can cause blockages. If they discharge to a small grease interceptor, the interceptor fills up with food solids and passes FOG into the public sewer.

## Why must dishwashers be re-routed?

When used properly, dishwashers are not a large source of FOG. Their primary function is to sanitize dishes and the source of sanitation; either high temperature or strong chemicals interfere with properly operating hydromechanical grease interceptors.

## I don't produce much grease; can I be exempt from cleaning?

No, while businesses cannot be exempt from cleaning requirements, they can apply for a variance. Variances allow a business to go longer than the time-based cleaning frequencies provided that the amount of grease and sediment does not exceed the interceptor's capacity.

## What harm can result from not maintaining a grease interceptor?

- Grease can pass into the publicly owned sewer and constrict the line, causing a sewer overflow.
- Clogs can cause wastewater to back up inside the FSE, resulting in closures, or a threat to public health if the FSE continues to serve food during a back-up.
- Blockages in FSE drain pipes must be cleared by a plumber, which results in added costs for the FSE.
- Corrosion to the interceptor can occur because of poor maintenance. This can result in extra costs for repairing or replacing the interceptor.
- Solidified grease in an interceptor requires extra time and specialized equipment to remove. This results in extra costs for the FSE.

## Why do hydromechanical grease interceptors (aka grease traps) need more frequent cleaning?

These grease interceptors are smaller and not designed to store large amounts of grease, so they must be cleaned frequently to work properly.

## What's the difference between gravity grease interceptors, hydromechanical grease interceptors and high-capacity hydromechanical grease interceptors?

- Size and capacity. A gravity grease interceptor is typically over 1000 gallons and installed outside. Because of their size, they can go longer between pump-outs.
- A hydromechanical grease interceptor is smaller (20 to 50 gallons), installed inside and must be cleaned often because they fill with grease quickly.
- A high-capacity hydromechanical grease interceptor is small but is designed to hold more grease and can go longer between pump-outs.

# Appendix A



# COMMERCIAL KITCHEN

## BEST MANAGEMENT PRACTICES

Commercial kitchens produce wastewater with fats, oils and grease (FOG). FOG is a major contributor to blockages in the sewer system. As FOG goes through the sewer system it builds up in sewer pipes and causes blockages. Blockages increase the cost of maintaining the system and result in sewer overflows or backups into homes and businesses.

FOG discharges are managed with the use of a grease interceptor. Interceptors work by slowing the flow of wastewater and allowing FOG to float and food sediment to settle. Baffles or pipes in the interceptor allow clean water to pass into the sewer while keeping FOG and solids out. Anything that you put down the sink will be kept in the interceptor. The more food waste you put down the drain, the more often you must clean your interceptor. Implementing Best Management Practices focused on diverting food waste can keep your pipes flowing freely, reduce your interceptor cleaning frequency and reduce costs.

Kitchen Best Management Practice (BMP)	Reason Why
Train employees in kitchen BMP's and explain why they should follow BMPs.	Employees are more willing to support BMPs if they understand that they prevent slow drains and clogged pipes.
Display no grease down the drain signs prominently in the kitchen.	Signs serve as a constant reminder for employees working in kitchens.
Divert food sediment by installing screens/ strainers on all kitchen drains including floor drains and floor sinks. Screens/strainers should be removable for frequent cleaning.	Drain screens/strainers prevent food sediment from entering your interceptor. If your interceptor does not fill with food, you don't need clean it as often.
Divert FOG by scraping or dry-wiping excess food and solidified grease from pots, pans, fryers, and utensils, then dispose of it in the trash.	Even a well-maintained grease interceptor only captures 95% of incoming grease. By dry wiping and disposing of food waste in garbage receptacles the material will not be sent to the grease traps but instead go to the landfill.
Pour all liquid oil from pots, pans and fryers into a covered container for recycling. Use a professional cooking oil recycling company to pick up your waste.	Recycling reduces the amount of FOG discharged to the sewer.
If you have a small interior grease interceptor self-clean it weekly.	Self-cleaning reduces costs. Weekly cleaning reduces odors and makes self-cleaning more manageable.
If you have a small interior grease interceptor. Keep it readily accessible for inspections and cleaning. Do not store equipment on it or place appliances on it.	Keeping a grease interceptor accessible is required by LOTT and makes it easier to clean it regularly.
Clean your sewer lateral on a routine basis.	Cleaning your sewer lateral removes accumulated grease, keeps your pipes flowing and prevents your grease interceptor from backing up.

# FAT'S, OILS & GREASE

## DISPOSAL REFERENCE

### DOS & DON'TS

**DO:** Wipe grease off pots, pans and work areas prior to washing.

**DON'T:** Do not put greasy cooking residue directly into drains. Grease can clog your pipes and result in an expensive repair.



**DO:** Dispose of food waste in the trash.

**DON'T:** Do not use the garbage disposal for food scraps. Food waste material can ball-up in downstream plumbing and cause a clog.



**DO:** Collect waste oil and store in an appropriate container for recycling.

**DON'T:** Do not pour waste oil down the drain or into the street. Grease that is not disposed of properly can harm our environment.



**DO:** Clean mats inside in a utility sink. Use dry cleanup for spills.

**DON'T:** Do not wash floor mats or rinse spills outside. Grease and soapy water can run into storm drains that flow to Puget Sound.



# Grease Interceptor Cleaning Standards

## Hydromechanical Grease Interceptor (Grease Trap)

1. Pump out all liquid and solid contents.
2. Remove baffles and scrape clean.
3. Clean and scrape inside the trap.
  - Remove visible grease.
  - Remove ridge tar from the side of the trap.
4. Clean loose material from the lid.
5. Replace baffle.
6. Refill with water to the bottom of the baffle.
7. Note trap condition such as:
  - Missing baffle
  - Estimated volume of grease and sediment
  - Excessive corrosion
  - Gasket in disrepair or missing
  - Evidence of back-ups or overflow

## Gravity Grease Interceptor

1. Pump out all liquid and solid contents to the bottom of the interceptor so its structural integrity can be inspected.\*
2. Remove all accumulated grease from the walls such as:
  - Ledge/ridge grease
  - Grease clumped on the walls
3. Clean the inlet tee, outlet tee, and baffle wall elbow (if accessible) with a high-pressure hose or pressure washer.
4. Note tank condition such as:
  - Missing pipes
  - Estimated volume of grease and sediment
  - Excessive concrete corrosion
  - Evidence of back-ups or overflow
  - Trash in the interceptor

\* It might not always be feasible to completely pump grease interceptors that have not been serviced adequately. In this case, the pumper will notify LOTT and the FSE and provide an estimate of the remaining material and the date of when the pump-out will be completed.



Gravity grease interceptor

# SELF-CLEANING A GREASE INTERCEPTER

## INSTRUCTIONS

### 1. Remove Top Grease

Remove grease from the top using a slotted spoon or ladle.



### 2. Scrape the Sides

Remove grease from the sides of the grease trap using a scraper, or similar flat-sided tool.



### 3. Remove Solids

Remove the solids from the bottom of the grease trap using a strainer.



### 4. Clean Around Baffle

Pull baffle up and scrape away the grease. Then replace the baffle back into slots.



### 5. Use Dry Absorbent\*

Mix grease and sediment with a dry absorbent, such as kitty litter or sawdust, until there is no free liquid.



### 6. Dispose of Grease

Dispose of contents in a solid waste container.



### 7. Record Maintenance

Record grease interceptor maintenance in a logbook.



\* As an alternative to mixing with a dry absorbent, the removed grease can be placed in a grease container and disposed of by a participating grease pumper company. Contact your fryer grease company and see if they can provide a brown grease container.





## Grease Interceptor Cleaning Variance Request Form

### Business Information

---

Business Name

---

Type of Food Service Establishment

---

Mailing Address

City

State

Zip

---

Physical Address (if different)

City

State

Zip

---

Authorized Representative Name and Title

---

Authorized Representative Phone and Email

*\* An Authorized Representative is a president, secretary, treasurer, or vice-president of a corporation, a general manager or proprietor of a partnership or sole proprietorship, or a person designated in writing by a person described above if the written designation has been submitted to LOTT.*

### Grease Interceptor Information

If known, what brand of grease interceptor is used at your establishment?

---

What type of grease interceptor does your facility have?

Hydromechanical grease interceptor (commonly known as grease traps)

- Hydromechanical grease interceptors are small (20-100 gallons) and typically located inside.

Gravity grease interceptor

- Gravity grease interceptors are large (100-3000 gallons), typically located outside, and have polycarbonate or iron utility covers.

Who cleans your grease interceptor? (choose one or both)

Self-cleaned

- Include a copy of your maintenance log and photo of the cleaned interceptor.

# Appendix A

How do you manage grease and food sediment that you remove?

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Pumping Company

- Please provide a copy of the most recent pump-out report.
- Which grease pumping company cleans your grease interceptor?

---

---

How often is your grease interceptor currently cleaned, and what is your proposed cleaning frequency?

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---

If known, what is your grease interceptor manufacturer's recommended cleaning frequency?

---

---

\_\_\_\_\_ is requesting LOTT to grant a variance to the grease interceptor cleaning frequencies specified in the LOTT regulations. I certify that the above information is true to the best of my knowledge, and request that LOTT conduct facility inspections to check the operational condition of my grease interceptor, and to measure grease and sediment levels to determine an adequate cleaning frequency.

\_\_\_\_\_  
Signature of Authorized Representative

\_\_\_\_\_  
Date





## LOTT DISCHARGE AND INDUSTRIAL PRETREATMENT REGULATIONS

## **SECTION 1 – GENERAL PROVISIONS**

- 1.1 Purpose and Policy
- 1.2 Administration
- 1.3 Abbreviations
- 1.4 Definitions

## **SECTION 2 – GENERAL SEWER USE REQUIREMENTS**

- 2.1 Prohibited Discharge Standards
- 2.2 National Categorical Pretreatment Standards
- 2.3 State Pretreatment Standards
- 2.4 Local Limits
- 2.5 Right of Revision
- 2.6 Dilution

## **SECTION 3 – PRETREATMENT OF WASTEWATER**

- 3.1 Pretreatment Facilities
- 3.2 Proper Operation and Maintenance
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## **SECTION 4 – WASTEWATER DISCHARGE PERMITS**

- 4.1 Industrial Users Surveys
- 4.2 Wastewater Discharge Permit Requirement
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- 4.5 Wastewater Discharge Permit Application Contents
- 4.6 General Permits
- 4.7 Application Signatories and Certification
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## **SECTION 5 – WASTEWATER DISCHARGE PERMIT ISSUANCE**

- 5.1 Wastewater Discharge Permit Duration
- 5.2 Wastewater Discharge Permit Contents
- 5.3 Permit Issuance Process
- 5.4 Wastewater Discharge Permit Modification
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- 6.1 Baseline Monitoring Reports
- 6.2 Compliance Schedule Progress Reports
- 6.3 Reports on Compliance with Categorical Pretreatment Standard Deadline
- 6.4 Periodic Compliance Reports
- 6.5 Reports of Changed Conditions
- 6.6 Reports of Potential Problems
- 6.7 Reports from Unpermitted Users
- 6.8 Notice of Violation/Repeat Sampling and Reporting
- 6.9 Notification of Discharge of Hazardous Waste

- 6.10 Analytical Requirements
- 6.11 Sample Collection
- 6.12 Date of Receipt of Reports
- 6.13 Record Keeping
- 6.14 Certification Statements

## **SECTION 7 – COMPLIANCE MONITORING**

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## **SECTION 8 – CONFIDENTIAL INFORMATION**

## **SECTION 9 – PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE**

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- 10.1 Notification of Violation
- 10.2 Consent Orders
- 10.3 Show Cause Hearing
- 10.4 Compliance Orders
- 10.5 Cease and Desist Orders
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## **SECTION 11 – JUDICIAL ENFORCEMENT REMEDIES**

- 11.1 Injunctive Relief
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## **SECTION 12 – SUPPLEMENTAL ENFORCEMENT ACTION**

- 12.1 Penalties for Late Reports
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## **SECTION 13 – AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS**

- 13.1 Upset
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## **SECTION 14 – WASTEWATER TREATMENT SURCHARGES AND PERMIT FEES**

- 14.1 Excess Strength Charges
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**SECTION 15 – MISCELLANEOUS PROVISIONS**

- 15.1 Pretreatment Charges and Fees
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**SECTION 16 – EFFECTIVE DATE**

# LOTT DISCHARGE AND INDUSTRIAL PRETREATMENT REGULATIONS

## SECTION 1 – GENERAL PROVISIONS

### 1.1 Purpose and Policy

This Ordinance sets forth uniform requirements for Users of the Publicly Owned Treatment Works (POTW) for the LOTT Alliance and the Cities of Lacey, Olympia, and Tumwater, and for Thurston County and enables the LOTT Alliance and the Cities of Lacey, Olympia, and Tumwater, and Thurston County to comply with all applicable State and Federal laws, including the Clean Water Act (33 United States Code, Section 1251 et seq.) and the General Pretreatment Regulations (40 Code of Federal Regulations Part 403). The objectives of this Ordinance are:

- A. To protect the POTW from potential harm by establishing clear standards and requirements for pretreatment of non-domestic waste. Harm to be prevented includes: causing Interference or otherwise harming the collection system; causing Pass Through, or otherwise harming the receiving environment; or causing the POTW to respond to a discharge based on a real or perceived threat;
- B. To protect POTW staff who may be affected by wastewater and sludge in the course of their employment and to protect the general public;
- C. To promote reuse and recycling of industrial wastewater by Industrial Users;
- D. To provide high-quality end products, such as reclaimed water and biosolids from the POTW, for beneficial use;
- E. To provide for fees for the equitable distribution of the cost of operation, maintenance, and improvement of the POTW; and
- F. To enable LOTT to comply with its National Pollutant Discharge Elimination System permit conditions, sludge use and disposal requirements, and any other Federal or State laws to which the POTW is subject.

This Ordinance shall apply to all Users of the POTW. The Ordinance authorizes the issuance of wastewater discharge permits; provides for monitoring, compliance, and enforcement activities; establishes administrative review procedures; requires User reporting; and provides for the setting of fees for the equitable distribution of costs resulting from the program established herein.

## 1.2 Administration

Except as otherwise provided herein, the LOTT Executive Director shall administer and implement the provisions of this Ordinance, and shall conduct other activities as set forth in Article VII of 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.” Any powers granted to or duties imposed upon the Executive Director may be delegated by the Executive Director to personnel under the Executive Director’s direction.

## 1.3 Abbreviations

The following abbreviations, when used in this Ordinance, shall have the designated meanings:

BMP	Best Management Practice
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
USEPA	U.S. Environmental Protection Agency
gpd	Gallons per day
MIU	Minor Industrial User
mg/L	Milligrams per liter
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
SIU	Significant Industrial User
U.S.C.	United States Code

## 1.4 Definitions

Unless a provision explicitly states otherwise, the following terms and phrases, as used in this Ordinance, shall have the meanings hereinafter designated.

- A. Act or "the Act" – The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. Section 1251 et seq.
- B. Amalgam separator - A collection device designed to capture and remove dental amalgam from the amalgam process wastewater of a dental facility.
- C. Approval Authority – The Washington State Department of Ecology, Water Quality Program Manager.
- D. Authorized or Duly Authorized Representative of the User –
  - 1. If the User is a corporation:

## Appendix B

- a. The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
  - b. The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions, which govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.
  3. If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
  4. The individuals described in Section 1.4 (D)(1-3), may designate another authorized representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates, or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the Executive Director.
- E. Biochemical Oxygen Demand or BOD – The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures for five (5) days at 20 degrees centigrade, usually expressed as a concentration (e.g., mg/L).
- F. 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.
- G. Building Sewer or Lateral – that portion of the sewer beginning outside the outer foundation wall of a structure and extending to the connection to the public

sewer main, or septic tank effluent pumping (S.T.E.P.) tank, or to the City owned grinder system service connection.

- H. Categorical Pretreatment Standard or Categorical Standard – Any regulation containing pollutant discharge limits promulgated by the USEPA in accordance with Sections 307(b) and (c) of the Act (33 U.S.C. Section 1317), which apply to a specific category of Users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.
- I. Categorical Industrial User or CIU – An Industrial User subject to a Categorical Pretreatment Standard or Categorical Standard.
- J. [City or County] – The City or County of [City or County], Washington, a municipal corporation or county organized and existing under and by virtue of the laws of the State of Washington.
- K. Clarifier – A device designed and installed so as to separate and retain deleterious, hazardous, or undesirable matter such as sand, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin from a waste stream and allow liquid waste to discharge to the POTW.
- L. Composite Sample – A composite of several samples taken throughout the period of a day when a regulated discharge is occurring. Several brands of electric samplers, some with a refrigerated sample collection area, may be used. Approvable composite samplers may either use a flow paced or time paced algorithm. For example, collecting a same size aliquot every 1,000 gallons (flow paced), or a variable sized aliquot every hour (time paced). In both cases, they must interface with a device, which senses the effluent flow volume to collect a representative sample unless the Executive Director has determined that a flow proportionate sample is not required.
- M. Daily Limit or Daily Maximum Limit – The maximum allowable discharge of a pollutant over a calendar day or equivalent representative 24-hour period. Where daily maximum limits are expressed in units of mass, and the daily discharge is calculated by multiplying the daily average concentration and total flow volumes in the same 24-hour period by a conversion factor to get the desired units. Where daily limits are expressed in terms of a concentration, the daily discharge is the composite sample value, or flow weighted average if more than one discrete sample was collected. Where flow weighting is infeasible, the daily average is the arithmetic average of all samples if analyzed separately, or the sample value if samples are composited prior to analysis.
- N. Domestic User (Residential User) – Any person who contributes, causes, or allows the contribution of wastewater into the POTW that is of a similar volume and/or chemical make-up as that of a residential dwelling unit. Discharges from a residential dwelling unit include up to 900 cubic feet of flow per month, with a

concentration up to 300 mg/L of Biochemical Oxygen Demand, 300 mg/L of Total Suspended Solids, and 60 mg/L Total Ammonia.

- O. Environmental Protection Agency – The U.S. Environmental Protection Agency or, where appropriate, the Regional Water Management Division Director, the Regional Administrator, or other duly authorized official.
- P. Executive Director – The Executive Director of the LOTT Alliance and shall be considered LOTT Alliance personnel or the LOTT Alliance’s agent for purposes of Article VII of 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.” The term also means a duly authorized representative of the Executive Director.
- Q. Existing Source – Any source of discharge subject to Categorical Standards that does not meet the definition of a “New Source” per Section 1.4(FF).
- R. Fats Oils and Grease or FOG - Compounds derived from animal and/or plant sources that contain multiple carbon chain triglyceride molecules.
- S. Grab Sample – A sample, which is taken from a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes.
- T. Gravity Grease Interceptor or GGI – A plumbing appurtenance or appliance that is installed in a sanitary drainage system to intercept nonpetroleum fats, oil and grease (FOG) from a wastewater discharge and is identified by volume, 30 minute retention time, baffle(s), not less than two compartments, a total volume of not less than 300 gallons, and gravity separation.
- U. Grease Interceptor – A plumbing appurtenance or appliance that intercepts fats, oil and grease from a wastewater discharge.
- V. Hydromechanical Grease Interceptor or HGI – A plumbing appurtenance or appliance (commonly known as a grease trap) that is installed in a sanitary drainage system to intercept nonpetroleum fats, oil and grease (FOG) from a wastewater discharge and is identified by flow rate, and separation, and retention efficiency.
- W. Indirect Discharge or Discharge – The introduction of pollutants into the POTW from any non-domestic source regulated under 307(b), (c), or (d) of the Act.
- X. Instantaneous Maximum Discharge Limit or Instantaneous Limit – The maximum concentration of a pollutant allowed to be discharged at any time, determined from the analysis of a discrete sample. Where a User is required to take a grab sample for purposes of determining compliance with Local Limits, this standard is

the same as the Daily Maximum standard. For pollutants for which Users are required to take composite samples, (or for metals if no permit has been issued), the Instantaneous Limit shall be twice the Daily Limit.

- Y. Interference – A discharge that causes (either by itself or in combination with other discharges) a violation of LOTT's NPDES permit or prevents the intended sewage sludge use or disposal by inhibiting or disrupting the POTW, including its collection systems, pump stations, and wastewater and sludge treatment processes. For example, a discharge from a User that causes a blockage resulting in a discharge at a point not authorized under LOTT's NPDES permit.
- Z. Local Limits – Effluent limitation developed for Users by the Executive Director to specifically protect the POTW from the potential of Pass Through, Interference, vapor toxicity, explosions, sewer corrosion, and intended biosolids uses. Such limits shall be based on the POTW's site-specific flow and loading capacities, receiving water considerations, and reasonable treatment expectations for non-domestic wastewater. See Section 2.4 for a full list of Local Limits.
- AA. LOTT Alliance or LOTT – A State of Washington nonprofit corporation created by Interlocal Agreement that operates as a public agency under State of Washington law, providing wastewater management and reclaimed water production services for the urbanized area of north Thurston County, Washington.
- BB. Minor Industrial User or MIU – Any Industrial User that does not otherwise qualify as a Significant Industrial User of the POTW, identified by the Executive Director as having the potential to spill or discharge chemicals or slugs of wastewater to the POTW, or the potential to discharge a waste stream that, when taken into account with the waste streams of other Industrial Users, may have a significant impact on the POTW.
- CC. Medical Waste – Isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- DD. Monthly Average – The arithmetic mean of the effluent samples collected during a calendar month or specified 30-day period. Where the Control Authority has taken a sample during the period, it must be included in the monthly average if provided in time. However, where composite samples are required, grab samples taken for process control or by the Control Authority are not to be included in a monthly average.
- EE. Monthly Average Limit – The limit to be applied to the Monthly Average to determine compliance with the requirements of this Ordinance (see Section 2.4 for listing).

FF. New Source –

1. Any building, structure, facility, or installation from which there is (or may be) a discharge of pollutants, the construction of which commenced after the publication of proposed pretreatment standards under Section 307(c) of the Act, which will be applicable to such source if such standards are thereafter promulgated in accordance with that Section, provided that:
  - a. The building, structure, facility, or installation is constructed at a site at which no other source is located;
  - b. The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
  - c. The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source, should be considered.
2. Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of (b) or (c) above but otherwise alters, replaces, or adds to existing process or production equipment.
3. Construction of a new source as defined under this paragraph has commenced if the owner or operator has:
  - a. Begun, or caused to begin, as part of a continuous onsite construction program,
    - (i) any placement, assembly, or installation of facilities or equipment; or
    - (ii) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities that is necessary for the placement, assembly, or installation of new source facilities or equipment; or
  - b. Entered into a binding contractual obligation for the purchase of facilities or equipment, which are intended to be used in its operation within a reasonable time. Options to purchase or contracts, which can

be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

- GG. Non-Contact Cooling Water – Water used for cooling that does not come into direct contact with any raw material, intermediate product, waste product, or finished product.
- HH. Pass Through – A discharge, which exits the POTW into waters of the United States in quantities or concentrations, which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of LOTT's NPDES permit, including an increase in the magnitude or duration of a violation.
- II. Person – Any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity, or any other legal entity; or their legal representatives, agents, or assigns. This definition includes all Federal, State, and local governmental entities.
- JJ. pH – A measure of the acidity or alkalinity of a solution, expressed in standard units.
- KK. Pollutant – Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, municipal, agricultural and industrial wastes, and certain characteristics of wastewater (e.g., pH, temperature, Total Suspended Solids, turbidity, color, Biochemical Oxygen Demand, Carbonaceous Oxygen Demand, toxicity, or odor).
- LL. Pretreatment – The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of, introducing such pollutants into the POTW. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable pretreatment standard.
- MM. Pretreatment Requirements – Any substantive or procedural requirement related to pretreatment imposed on a User, other than a pretreatment standard.
- NN. Pretreatment Standards or Standards – Pretreatment standards shall mean discharge prohibitions (Section 2.1), categorical pretreatment standards (Section 2.2), State pretreatment standards (Section 2.3) and local limits (Section 2.4).
- OO. 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 any conveyances, including sanitary sewer and storm sewer collection systems, which convey wastewater to a treatment plant.

- PP. Septic Tank Waste – Sewage and typically associated solids from domestic activities pumped from a septic tank serving one or more private residences. The Executive Director may also consider wastes from other holding tanks such as boat blackwater, bilge water, cesspools, and treatment lagoons to be Septic Tank Waste so long as they are absent chemicals, which might inhibit biological activity.
- QQ. Sewage – Human excrement and gray water (from household showers, toilets, kitchens, clothes and dish washing, and related domestic activities).
- RR. Significant Industrial User or SIU – Except as provided in paragraphs (3) and (4) of this Section, a Significant Industrial User is:
1. A User subject to categorical pretreatment standards; or
  2. A User that:
    - a. Discharges an average of twenty-five thousand (25,000) gpd or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blowdown wastewater);
    - b. Contributes a process wastestream that makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW, treatment plant; or
    - c. Is designated as such by [the City] on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.
  - (3) The Executive Director may determine that a User subject to categorical pretreatment standards is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the User never discharges more than one-hundred (100) gpd of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:

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- a. the User, prior to Executive Director's finding, has consistently complied with all applicable categorical Pretreatment Standards and Requirements;
  - b. the User annually submits the certification statement required in Section 6.14(B) and 40 CFR Part 403.12(q), together with any additional information necessary to support the certification statement; and
  - c. the User never discharges any untreated concentrated wastewater.
- (4) Upon a finding that a User meeting the criteria in Section 1.4(RR)(2) has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Executive Director may at any time, on its own initiative or in response to a petition received from a User, and in accordance with procedures in 40 CFR Part 403.8(f) (6), determine that such User should not be considered a Significant Industrial User.
- SS. 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.
- TT. Storm Water – Any flow occurring during or following any form of natural precipitation, and resulting from such precipitation, including snowmelt.
- UU. Total Suspended Solids – The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquid, and which is removable by laboratory filtering.
- VV. User or Industrial User – Any Person with a source of discharge that does not qualify that person as a Domestic User who discharges an effluent into the POTW by means of pipes, conduits, pumping stations, force mains, tank trucks, constructed drainage ditches, intercepting ditches, and all constructed devices and appliances appurtenant thereto.
- WW. Wastewater – Liquid and water-carried industrial wastes and sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the POTW.
- XX. Wastewater Treatment Plant or Treatment Plant – That portion of the POTW,

which is designed to provide treatment of municipal sewage and industrial waste.

## SECTION 2 – GENERAL SEWER USE REQUIREMENTS

### 2.1 Prohibited Discharge Standards

- A. General Prohibitions – No User shall introduce or cause to be introduced into the POTW any pollutant or wastewater, which causes Pass Through or Interference. These general prohibitions apply to all Users of the POTW whether or not they are subject to Categorical Pretreatment Standards or any other National, State, or local pretreatment standards or requirements.
- 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 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.
  4. Pollutants, including oxygen-demanding pollutants (Biochemical Oxygen Demand, etc.), released in a discharge at a flow rate and/or pollutant concentration, which, either singly or by interaction with other pollutants, will cause interference with the POTW.
  5. Wastewater having a temperature that will interfere with the biological activity in the system, has detrimental effects on the collection system, or prevents entry into the sewer. In no case shall wastewater be discharged, which causes the wastewater temperature at the treatment plant to exceed 104 degrees F (40 degrees C).
  6. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference or Pass Through.

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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.
8. Trucked or hauled pollutants, except at discharge points designated by the Executive Director in accordance with Section 3.5 of this Ordinance.
9. The following are prohibited unless approved by the Executive Director under extraordinary circumstances, such as lack of direct discharge alternatives due to combined sewer service or need to augment sewage flows due to septic conditions (as required under WAC 173-216-060).
  - a. Non-contact cooling water in significant volumes.
  - b. Stormwater, or other direct inflow sources.
  - c. Wastewaters significantly affecting system hydraulic loading, which do not require treatment or would not be afforded a significant degree of treatment by the system.
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.
11. Wastewater, which imparts color that cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating LOTT's NPDES permit.
12. Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations.
13. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted wastewater, unless specifically authorized by the Executive Director.
14. Sludges, screenings, or other residues from the pretreatment of industrial wastes;
15. Medical wastes, except as specifically authorized by the Executive Director and the [City or County] in a wastewater discharge permit;
16. Wastewater causing, alone or in conjunction with other sources, the

treatment plant's effluent to fail a toxicity test;

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.
19. Wastewater causing two readings on an explosion hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than ten percent (10%) or any single reading over twenty percent (20%) of the Lower Explosive Limit based on an explosivity meter reading.

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.

## **2.2 National Categorical Pretreatment Standards**

The categorical pretreatment standards found at 40 CFR Chapter I, Subchapter N, Parts 405-471 are hereby incorporated.

- A. Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the Executive Director may impose equivalent concentration or mass limits in accordance with Section 2.2(E) and 2.2(F) and 40 CFR Part 403.6(c).
- B. When categorical Pretreatment Standards are expressed in terms of a mass of pollutant, which may be discharged per unit of production, the Executive Director may either impose limits based on mass or equivalent effluent concentrations. The User must supply appropriate actual or projected long term production rates for the unit of production specified in order to facilitate this process pursuant to 40 CFR Part 403.6(c)(2)
- C. The Executive Director may allow wastewater subject to a categorical pretreatment standard to be mixed with other wastewaters prior to treatment. In such cases, the User shall identify all categorical wastestreams and provide sufficient information on each non-categorical wastestream to determine whether it should be considered dilute for each pollutant. Absent information showing that non-categorical wastestreams contain the pollutant in question at levels above that of the supply water, such wastestreams shall be considered dilute. In such situations, the Executive Director shall apply the combined wastestream formula as found at 40 CFR Part 403.6(e) to determine appropriate limits.
- D. A CIU may request an adjustment to a categorical standard to reflect the presence of pollutants in the Industrial User's intake water when its water source

is from the same body of water that the POTW discharges into.

1. Any CIU wishing to obtain credit for intake pollutants must include, in their permit application, sample data showing influent water pollutant levels, which form the basis for the credit requested in their permit application.
  2. Unless the categorical standard was written to be applied on a net basis, the information supplied by the CIU must also demonstrate that the treatment system it proposes or uses to meet the categorical standards would, if properly installed and operated, meet the Standards in the absence of pollutants in the intake waters.
  3. In response to an acceptable application, the Executive Director may adjust the categorical standards to the extent necessary to meet the applicable categorical Pretreatment Standard(s), up to a maximum value equal to the influent pollutant concentration.
  4. The Executive Director may waive the requirement for the intake water to be drawn from the same body of water the POTW discharges to if the Executive Director determines that no environmental degradation will result.
- E. When a categorical pretreatment standard is expressed only in terms of pollutant concentrations, an Industrial User may request that the Executive Director convert the limits to equivalent mass limits. The Executive Director may establish equivalent mass limits if the Industrial User meets all of the conditions set forth below.
1. To be eligible for equivalent mass limits, the Industrial User must submit information with its permit application or permit modification request, which:
    - a. Shows it has a pretreatment system, which has consistently met all applicable Pretreatment Standards and maintained compliance without using dilution;
    - b. Describes the water conserving practices and technologies it employs, or will employ, to substantially reduce water use during the term of its permit;
    - c. Includes the facility's actual average daily flow rate for all waste streams from continuous effluent flow metering;
    - d. Determines an appropriate unit of production, and provides the present and long-term average production rates for this unit of production;

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- e. Shows that long term average flow and production are representative of current operating conditions;
  - f. Shows that its daily flow rates, production levels, or pollutant levels do not vary so much that equivalent mass limits would be inappropriate; and
  - g. Shows the daily and monthly average pollutant allocations currently provided based on the proposed unit of production.
2. An Industrial User subject to equivalent mass limits must:
- a. Maintain and effectively operate control and treatment technologies adequate to achieve compliance with the equivalent mass limits;
  - b. Continue to record the facility's flow by continuous effluent flow monitoring;
  - c. Continue to record the facility's production rates;
  - d. Notify the Executive Director if production rates are expected to vary by more than twenty (20) percent from the baseline production rates submitted according to Section 2.2(E)(1)(d). The Executive Director may reassess and revise equivalent limits as necessary to reflect changed conditions; and
  - e. Continue to employ the same or comparable water conservation methods and technologies as those implemented pursuant to Section 2.2(E)(1)(b) so long as it discharges under an equivalent mass limit.
3. Equivalent mass limits:
- a. Will not exceed the product of the actual average daily flow from regulated process(es) of the User and the applicable concentration-based daily maximum and monthly average standards (and the appropriate unit conversion factor);
  - b. May be reassessed and the permit revised upon notification of a revised production rate, as necessary to reflect changed conditions at the facility; and
  - c. May be retained in subsequent permits if the User's production basis and other information submitted in 2.2(E)(1) is verified in their reapplication. The User must also be in compliance with Section 13.3 regarding the prohibition of bypass.

- F. The Executive Director may convert the mass limits of the categorical pretreatment standards of 40 CFR Parts 414 (organic chemicals), 419 (petroleum refining), and 455 (pesticide formulating, packaging, and repackaging) to concentration limits in permits for such Users. In such cases, the Executive Director will document the basis and the determination that dilution is not being substituted for treatment in the permit fact sheet.
- G. The Executive Director is obliged under Federal regulations to make the documentation of how any equivalent limits were derived (concentration to mass limits or vice versa) publicly available.
- H. Once incorporated into its permit, the User must comply with the equivalent limits in lieu of the Categorical Standards from which they were derived.
- I. The same production and flow estimates shall be used in calculating equivalent limits for the monthly (or multiple day average) and the maximum day.
- J. Users subject to permits with equivalent mass or concentration limits calculated from a production-based standard shall notify the Executive Director if production will significantly change. This notification is required within two business days after the User has a reasonable basis to know that that production will significantly change in the next calendar month. Users who fail to notify the Executive Director of such anticipated changes must meet the more stringent of the equivalent limits or the User's prior limits.

### **2.3 State Pretreatment Standards**

Washington State pretreatment standards and requirements, located at Chapter 173-216 WAC, were developed under authority of the Water Pollution Control Act, Chapter 90.48 RCW and are hereby incorporated. The version incorporated is the version current as of the date of the latest revision or version of this Ordinance. All waste materials discharged from a commercial or industrial operation into the POTW must satisfy the provisions of Chapter 173-216 WAC. In addition to some slightly more stringent prohibitions, (merged with Section 2.1), the following provisions unique to Washington State are required by this Chapter for discharges to a POTW:

- A. Any person who constructs or modifies or proposes to construct or modify wastewater treatment facilities must first comply with the regulations for submission of plans and reports for construction of wastewater facilities, chapter 173-240 WAC. Until LOTT or the [City or County] is delegated the authority to review and approve such plans under RCW 90.48.110, sources of non-domestic discharges shall request approval for such plans through the Department of Ecology. To ensure conformance with this requirement, proof of the approval of such plans and one copy of each approved plan shall be provided to the Executive Director and the [City or County] before commencing any such construction or modification.

- B. Users shall apply to the Executive Director and the [City or County] for a permit at least 60 days prior to the intended discharge of any pollutants other than domestic wastewater or wastewater, which the Executive Director has determined is similar in character and strength to normal domestic wastewater with no potential to adversely affect the POTW.
- C. All Significant Industrial Users must apply for and obtain a permit prior to discharge.
- D. All Users shall apply all known, available, and reasonable methods to prevent and control waste discharges to the POTW that may cause interference, pass through, contaminate biosolids, or violate a pretreatment standard or requirement. This provision does not apply to domestic wastewater or wastewater which the Executive Director has determined, is similar in character and strength to normal domestic wastewater with no potential to adversely affect the POTW.
- E. Discharge restrictions of Chapter 173-303 WAC (Dangerous Waste) shall apply to all Users.
- F. Claims of confidentiality shall be submitted according to WAC 173-216-080. Information, which may not be held confidential includes the: Name and address of applicant, description of proposal, the proposed receiving water, receiving water quality, and effluent data. Claims shall be reviewed based on the standards of WAC 173-216-080, Chapter 42.17 RCW, Chapter 173-03 WAC, and RCW 43.21A.160.
- G. Persons applying for a new permit or a permit renewal or modification, which allows a new or increased pollutant loading shall publish notice for each application in the format provided by the Executive Director. Such notices shall fulfill the requirements of WAC 173-216-090. These requirements include publishing:
  - 1. The name and address of the applicant and facility/activity to be permitted;
  - 2. A brief description of the activities or operations, which result in the discharge;
  - 3. Whether any tentative determination, which has been reached with respect to allowing the discharge;
  - 4. The address and phone number of the office of the Executive Director where persons can obtain additional information;
  - 5. The dates of the comment period (which shall be at least 30 days); and

6. How and where to submit comments or have any other input into the permitting process, including requesting a public hearing.
- H. The Executive Director and the [City or County] may require the applicant to also mail this notice to persons who have expressed an interest in being notified, to State agencies and local governments with a regulatory interest, and to post the notice on the premises. If the Executive Director or the [City or County] determined there is sufficient public interest the [City or County] shall hold a public meeting following the rules of WAC 173-216-100. The Executive Director or the [City or County] may assume responsibility for public notice requirements for any Person.
- I. Permit terms shall include, wherever applicable, the requirement to apply all known, available, and reasonable methods of prevention, control, and treatment.
- J. All required monitoring data shall be analyzed by a laboratory registered or accredited under the provisions of Chapter 173-50 WAC, except for flow, temperature, settleable solids, conductivity, pH, turbidity, and internal process control parameters. However, if the laboratory analyzing samples for conductivity, pH, and turbidity must otherwise be accredited, it shall be accredited for these parameters as well.

#### **2.4 Local Limits**

- A. The Executive Director may establish local limits pursuant to 40 CFR Part 403.5(c).
- B. The following pollutant limits are established to protect against Pass Through and Interference and reflect the application of reasonable treatment technology. No person discharging more than 1,000 gallons per day shall discharge wastewater in excess of the following Daily Maximum Concentration Limits unless authorized by a wastewater discharge permit issued by the [City or County]. In addition, no person discharging 1,000 gallons a day or less shall discharge wastewater in excess of following Daily Maximum Loading Limits unless authorized by a wastewater discharge permit issued by the [City or County].
- C. The below limits apply at the point where the wastewater is discharged to the POTW. All concentrations for metallic substances are for total metal unless indicated otherwise. The Executive Director may impose mass limits in addition to a concentration-based limits.

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- D. Users shall be subject to “instantaneous limits” (as determined by a grab sample) of equal to twice the below “daily maximum” concentrations for any pollutant for which a composite sample is required in a permit. This provision is inapplicable to Users without permits, or without the permit requirement to collect a composite sample for the analyte in question.

ANALYTE	DAILY MAXIMUM CONCENTRATION LIMIT	DAILY MAXIMUM LOADING LIMITS (1,000 gallons per day or less)
Arsenic	0.2 mg/L	0.002 lbs. per day
Cadmium	0.2 mg/L	0.002 lbs. per day
Chromium	1.0 mg/L	0.008 lbs. per day
Chromium (hexavalent)	0.25 mg/L	0.002 lbs. per day
Copper	0.5 mg/L	0.004 lbs. per day
Cyanide (total)	0.64 mg/L	0.005 lbs. per day
Cyanide (free)	0.25 mg/L	0.002 lbs. per day
Lead	0.4 mg/L	0.004 lbs. per day
Mercury	0.05 mg/L	0.0004 lbs. per day
Nickel	0.5 mg/L	0.004 lbs. per day
Silver	0.2 mg/L	0.002 lbs. per day
Zinc	1.0 mg/L	0.008 lbs. per day
Molybdenum	0.16 mg/L	0.002 lbs. per day
Reduction in effluent ultra violet transmissivity (per cm at 254 nm wavelength)	10% reduction	N/A
Decrease in maximum effluent no observed effect concentration (NOEC) in any whole effluent toxicity test	10% decrease	N/A

- E. Users discharging Biochemical Oxygen Demand, Total Suspended Solids, or ammonia in excess of the concentration limits by more than the threshold amount listed below must complete and submit a wastewater discharge permit application. Such Users may be subject to surcharges as established in and under the authority of Section 14.1 up to any maximum loading limit established by permit.

ANALYTE	EXCESS STRENGTH CHARGES THRESHOLD LIMIT	PERMITTED DISCHARGE THRESHOLD AMOUNT
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300 mg/L	2.5 lbs. per day
Total Suspended Solids	300 mg/L	2.5 lbs. per day
Total Ammonia, as ammonia (NH <sub>3</sub> ) and ammonium ion (NH <sub>4</sub> <sup>+</sup> )	60 mg/L	0.5 lbs. per day

- F. The Executive Director may establish and the [City or County] require via the individual or general permit process ceiling limits for compatible pollutants and appropriate discharge limits for all other pollutants not listed under Section 2.4. This includes pollutants subject to regulation under RCRA, volatile or semi-volatile organics, halogenated compounds, poly-aromatic hydrocarbons, polymers, surfactants, pesticide active ingredients, etc.
- 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.

## 2.5 Right of Revision

The Executive Director and the [City or County] reserves the right to establish, by regulation, Ordinance, or in wastewater discharge permits, more stringent standards or requirements on discharges to the POTW.

## 2.6 Dilution

No User shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limit unless expressly authorized by an applicable pretreatment standard or requirement. The Executive Director may impose mass limitations on Users where deemed appropriate to safeguard against the use of dilution to meet applicable pretreatment standards or requirements, or in other cases when the imposition of mass limitations is appropriate.

## **SECTION 3 – PRETREATMENT OF WASTEWATER**

### **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. Such plans (Engineering Report, Plans and Specifications, and Operation and Maintenance Manuals) shall be submitted as required by Chapter 173-240 WAC to either the Executive Director, the [City or County], or the Department of Ecology for review, and Users shall obtain approval prior to construction. The review of such plans and operating procedures shall in no way relieve the User from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the Executive Director and the [City or County] under the provisions of this Ordinance.

### **3.2. Proper Operation and Maintenance**

Users shall at all times be responsible for the proper operation and maintenance of any devices, facilities, or systems of control installed to achieve compliance with the terms and conditions of this Ordinance. Where design criteria have been established, the User shall not permit flows or waste loadings to exceed approved design criteria. This provision requires the operation of back-up, auxiliary facilities, or similar systems when necessary to achieve compliance with the conditions of this Ordinance. It is a violation of this Ordinance to intentionally tamper, modify, or alter any devices, facilities or systems in a manner inconsistent with their intended design.

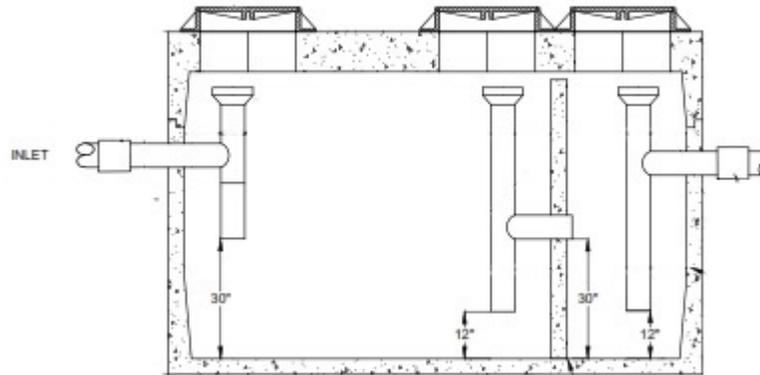
### **3.3 Additional Pretreatment Measures**

- A. The Executive Director may immediately and effectively halt or prevent any discharge of pollutants to the POTW, which reasonably appear to present an imminent endangerment to the health or welfare of persons. In such cases, the Executive Director will provide the User advance notice if possible, but shall not delay a response to imminent endangerment.
- B. The Executive Director may halt or prevent any discharge to the POTW, which presents or may present an endangerment to the environment or, which threatens to interfere with the operation of the POTW (including the collection system and pump stations). In such cases, the Executive Director shall attempt to provide not only notice to the affected User(s), but the opportunity to respond.
- C. Any User causing the Executive Director to exercise the emergency authorities provided for under Sections 3.3 (A) and (B) shall be responsible for

reimbursement of all related costs to the Executive Director and the [City or County].

- D. The Executive Director may require Users to reduce or curtail certain discharges to the sewer, designate that certain wastewater be discharged only into specific sewers, relocate and/or consolidate points of discharge, separate sewage wastestreams from industrial wastestreams, and take all other measures to protect the POTW and determine the User's compliance with the requirements of this Ordinance.
- 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 pretreatment facilities, devices, equipment, and/or units as may be necessary to treat non-domestic wastewater prior to entering the POTW. This includes but is not limited to:
  - 1. A sample taking facility accessible to the Executive Director
  - 2. A suitable storage and/or flow equalization tank
  - 3. Grease interceptors
  - 4. Clarifiers
  - 5. An approved combustible gas detection meter
  - 6. An amalgam separator.
- F. Users that are required to install any of the above devices will be notified in writing by the [City or County] or Executive Director. The notice may include, but not be limited to; requirements to obtain a plumbing permit, as well as timelines, and specifications regarding installation and operation of the device. 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 [City or County] or Executive Director. Users shall be responsible for all periodic inspection, cleaning, and repair of such devices.
- G. Hydromechanical Grease Interceptors shall have an internal or external flow control device installed to ensure that wastewater flow through the interceptor does not exceed the manufacturer's designed flow rating. This flow control device shall be maintained in effective operating condition at all times.

- H. Gravity grease interceptors and clarifiers shall have interior piping installed in accordance with the following conceptual standard (or equivalent approved by [City or County] and the Executive Director).



- I. Users that are required to have a grease interceptor may be required to connect any fixtures or drains that have a reasonable potential to allow fats, oils, and grease to be discharged to the POTW to that grease interceptor. Users with an existing grease interceptor that is too small to accept additional fixtures may be required to install additional grease interceptors, or replace the existing grease interceptor with an appropriately sized grease interceptor.
- J. Food waste disposal units shall not be connected to hydromechanical grease interceptors, nor shall they discharge directly to the sanitary sewer. Food waste disposal units shall either be connected to a gravity grease interceptor or removed altogether.
- K. Users with dishwashers or similar devices that are connected to hydromechanical grease interceptors may be required to re-route the dishwasher or similar device to bypass the interceptor upon written notice by the [City or County] or Executive Director if it is determined that the connection is causing the HGI to malfunction or bypass grease. Connection of a dishwasher or similar device to a hydromechanical grease interceptor after the effective date of this Ordinance is prohibited.
- L. To ensure proper operation, gravity grease interceptors must be cleaned at least once every ninety (90) calendar days. Gravity grease interceptors shall be considered out of compliance if the total volume of grease and solids displaces more than twenty-five (25) percent of the effective volume of the interceptor. If the Executive Director determines that cleaning every ninety (90) calendar days is not sufficient to remain in compliance, the cleaning frequency shall be

increased. If a User determines that cleaning every ninety (90) calendar days is unnecessary in order to remain in compliance, the facility may request a variance from the Executive Director. The Executive Director may grant a variance.

- M. To ensure proper operation, hydromechanical grease interceptors must be cleaned at least once every fourteen (14) calendar days. Hydromechanical grease interceptors shall be considered out of compliance if the total volume of grease and solids displaces more than twenty-five (25) percent of the effective volume of the interceptor. If the manufacturer's specifications or rating indicates that the interceptor has a greater working volume than twenty-five (25) percent, the manufacturer's recommendations may be used to determine compliance. If the Executive Director determines that cleaning every fourteen (14) calendar days is not sufficient to remain in compliance, the cleaning frequency shall be increased. If a User determines that cleaning every fourteen (14)-calendar days is unnecessary in order to remain in compliance, the facility may request a variance from the Executive Director. The Executive Director may grant a variance.
- N. When cleaned, all chambers of a gravity grease interceptor shall be completely pumped out. All liquids and solids shall be removed. Solidified grease shall be scraped and removed from the interior. Material that is removed shall not be discharged back into the interceptor, any part of the POTW, private sewer, drainage piping, or storm sewer system. All materials removed shall be handled and disposed of in accordance with federal, state, and local laws, rules, and regulations.
- O. Hydromechanical grease interceptors shall be maintained by the User or a professional pumping company retained by the User. When cleaned by the User, the interceptor must have surface grease and oil removed, settled solids removed, all sides scraped, removable parts removed and cleaned, be inspected for damage and corrosion, and be properly reassembled. Material that is removed shall not be discharged back into the interceptor, any part of the POTW, private sewer, drainage piping, or storm sewer system. All materials removed shall be handled and disposed of in accordance with federal, state, and local laws, rules and regulations.  
  
If a professional, pumping company services a hydromechanical grease interceptor it must be completely pumped out. All liquids and solids shall be removed. Solidified grease shall be scraped and removed from the interior. Material that is removed shall not be discharged back into the interceptor, any part of the POTW, private sewer, drainage piping, or storm sewer system. All materials removed shall be handled and disposed of in accordance with federal, state, and local laws, rules and regulations.
- P. Users shall document all grease interceptor cleaning and maintenance activities and maintain these records onsite for a minimum of three years. Records shall

be available for inspection by the Executive Director.

- Q. The direct addition into a grease interceptor of enzymes, chemicals or other agents for the purposes of grease reduction is prohibited. Grease interceptor design and sizing criteria are based on gravimetric separation for grease and solids removal. The addition of enzymes or chemical emulsion agents would impede the gravimetric separation and defeats the purpose of the grease interceptor. Any attempt to modify the trap or interceptor into a biological reactor by adding bacterial or microbial agents is also prohibited. These substances may be added downstream of the grease interceptor. Any such addition of enzymes downstream of a grease interceptor does not satisfy requirements for cleaning of laterals per Section 3.3(R).
  
- R. Laterals shall be maintained so constrictions or blockages do not interfere with the proper operation of a grease interceptor. The [City or County] may require periodic cleaning of laterals when it is determined that a lateral blockage is interfering with the proper function of a grease interceptor, or so the lateral may be used as a monitoring point to determine compliance with Section 2.1(B)(3) of this Ordinance.

### 3.4 Accidental Discharge/Slug Discharge Control Plans

The Executive Director, through a permit issued by the [City or County], may require any User to develop and implement an accidental discharge/slug discharge control plan and take other actions the Executive Director believes are necessary to control discharges, which may be caused by spills or periodic non-routine activities. Accidental discharge/slug discharge control plans shall include at least the following:

- A. A description of all discharge practices, including any non-routine batch discharges such as from cleaning, replenishment, or disposal;
- B. A description of all stored chemicals, disclosing all ingredients in formulations, which could violate a discharge prohibition if discharged to the sewer;
- C. The procedures for immediately notifying the Executive Director and the [City or County] of any accidental or slug discharge, as required by Section 6.6 of this Ordinance; and
- D. The procedures that will be taken to prevent the occurrence or adverse impact from any accidental or slug discharge. Such procedures shall address the inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

### 3.5 Hauled Wastewater

- A. Residential wastes meeting the definition of “Septic Tank Waste” may be introduced into the POTW at locations designated by the Executive Director, and at such times as are established by the Executive Director. The hauler of such wastes shall be responsible for ensuring such wastes comply with all discharge prohibitions (Section 2 of this Ordinance) and other applicable requirements of the Executive Director. The Executive Director may require septic tank waste haulers to obtain wastewater discharge permits issued by the City of Olympia or provide a manifest at the time of discharge identifying the customer name, address, and volume from each residence.
- B. The Executive Director shall require the hauler, and may also require the generator, of non-domestic waste to obtain a wastewater discharge permit. The Executive Director also may prohibit the disposal of any or all hauled industrial waste. The discharge of hauled industrial waste is subject to all relevant requirements of this Ordinance.
- C. Industrial waste haulers may discharge loads only at locations designated by the Executive Director and with the prior consent of the Executive Director. The

Executive Director may collect samples of each hauled load to ensure compliance with applicable standards, and halt the discharge at any point in order to take additional samples or hold the load pending analysis. The Executive Director may require the industrial waste hauler to provide a waste analysis of any load prior to discharge, to characterize the waste, or to certify that the waste does not meet the definition of a “Hazardous Waste” under chapter 173-303 WAC.

- E. Industrial waste haulers must provide a waste-tracking form for every load. This form shall include at least:
  - 1. Name and address of the industrial waste hauler;
  - 2. Hauler permit number;
  - 3. Truck and driver identification;
  - 4. Names and addresses of the sources of waste;
  - 5. Type of industry, volume, brief description, known characteristics and presumed constituents of waste; and
  - 6. Any wastes, which are “Hazardous Wastes” under RCRA.
- F. Fees for dumping hauled wastewater may be established by the Executive Director, based on the current LOTT wastewater service charge.

## **SECTION 4 – WASTEWATER DISCHARGE PERMITS**

### **4.1 Industrial User Surveys**

The Executive Director is obligated under Federal law to identify all Users potentially subject to the pretreatment program, and the character and volume of pollutants discharged by such Users. To satisfy this requirement, all sources of non-domestic discharges to the POTW must, upon request of the Executive Director or the [City or County], periodically complete an Industrial User Survey form. Users shall fully disclose the information requested and sign the completed form in accordance with Section 4.7. Proper completion of survey requirements is a condition of initial and continued discharge to the public sewer system. Users failing to fully comply with survey requirements within 30 days shall be subject to all enforcement measures authorized under this chapter including termination of service. The Executive Director is authorized to prepare several forms for this purpose and require completion of the particular form, which the Executive Director determines appropriate to provide the information needed to categorize each User. The Executive Director shall be authorized to categorize each User, provide written notice of a User's categorization and what it means, and revise this categorization at any time.

### **4.2 Wastewater Discharge Permit Requirement**

- A. No User categorized by the Executive Director as a Significant Industrial User shall discharge wastewater into the POTW without first obtaining an individual wastewater discharge permit developed by the Executive Director and issued by the [City or County] or, where applicable, a general permit from the Executive Director. A Significant Industrial User that has filed a timely application pursuant to Section 4.3 of this Ordinance may continue to discharge unless and until notified otherwise by the Executive Director.
- B. The Executive Director may require all other Users to obtain wastewater discharge permits, or implement Best Management Practices as necessary to carry out the purposes of this Ordinance. For example, a wastewater discharge permit may be required solely for flow equalization.
- C. Any failure to complete the required survey form, apply for and obtain a required permit, or violate the terms and conditions of a wastewater discharge permit shall be deemed violations of this Ordinance and subject the wastewater discharge permittee to the sanctions set out in Sections 10-12 of this Ordinance. Obtaining a wastewater discharge permit does not relieve a permittee of its obligation to comply with all Federal and State pretreatment standards or requirements or with any other requirements of Federal, State, and local law.

### **4.3 Wastewater Discharge Permitting: Existing Connections**

Any User required to obtain a wastewater discharge permit who was discharging wastewater into the POTW prior to the effective date of this Ordinance and who wishes to continue such discharges shall, within thirty (30) days after said date, apply to the Executive Director for a wastewater discharge permit in accordance with Section 4.5 of this Ordinance, and shall not cause or allow discharges to the POTW to continue after sixty (60) days of the effective date of this Ordinance except in accordance with a wastewater discharge permit issued by the [City or County].

### **4.4 Wastewater Discharge Permitting: New Connections**

Persons wishing to discharge non-domestic wastewater must first complete either a survey form (if they do not expect a permit is needed) or a permit application. Any User identified by the Executive Director through the survey as needing a permit must file a permit application. Applications for wastewater discharge permits, in accordance with Section 4.5 of this Ordinance, must be filed at least ninety (90) days prior to the desired date of discharge, and the discharge permit obtained prior to commencing discharge.

### **4.5 Wastewater Discharge Permit Application Contents**

- A. All Users required to obtain a wastewater discharge permit must apply using the form provided by the Executive Director. Users eligible for coverage under a General Permit may request such coverage using an industry specific form if one has been developed (see Section 4.6). Users must supply the Executive Director the following information as part of the permit application if relevant to the Users operation unless waived by the Executive Director.
1. Identifying information
    - a. The name and physical address of the facility, the names of the operator/facility manager and owner, and the name and address of the point of contact; and
    - b. A description of activities, facilities, and plant production processes on the premises.
  2. A list of any environmental control permits held by or for the facility.
  3. A description of operations and facilities including:
    - a. A brief description of the operations, average rate of production, and industrial classification (SIC or NAICS codes) of the operation(s) conducted on site; and
    - b. The number and type of employees, and proposed or actual hours of

- operation.
- c. The type, amount, rate of production, and process used for each product produced.
  - d. The type and amount of raw materials used (average and maximum rates).
  - e. The raw materials and chemicals to be routinely stored at the facility (including products in rail cars and tank trucks located on site).
  - f. The types of wastes generated on a routine and periodic basis.
  - g. The times and durations when wastes will be discharged.
  - h. A schematic process diagram showing each process step, waste stream, treatment step, internal recycle, and point of discharge to the POTW. This diagram should identify which streams are subject to categorical standards.
  - i. Site plans, floor plans, mechanical and plumbing plans, and details to show all sewers, floor drains, and appurtenances by size, location, and elevation, and all points of discharge.
  - j. The sampling locations and provisions for monitoring discharges.
  - k. Whether plans for wastewater facilities under Chapter 173-240 WAC have been developed, and their approval status (Engineering Report, Plans and Specifications, and an Operations and Maintenance Manual).
4. Flow data: The average daily and maximum daily flow, in gallons per day, to the POTW from each waste stream. Information shall be complete enough to allow use of the combined wastestream formula per Section 2.2(C) and 40 CFR Part 403.6(e) where applicable.
  5. Pollutant data:
    - a. The categorical pretreatment standards applicable to each regulated process.
    - b. The results of sampling and analysis identifying the nature and concentration, (and mass where required by the standard or the Executive Director), of regulated pollutants in the discharge from each regulated process.

- c. The estimated peak instantaneous, daily maximum, and long-term average discharge concentrations (and mass) based on the sampling results.
  6. Sampling data to show samples are:
    - a. Representative of daily operations.
    - b. Taken just downstream from pretreatment facilities if such exist, or just downstream of the regulated process(es) if no pretreatment exists.
    - c. Collected as required by Section 6.11 of this Ordinance.
    - d. Analyzed according to Section 6.10 of this Ordinance.
  7. Information confirming BMPs. Where standards specify a BMP or pollution prevention alternative, the User must include the information needed by the Executive Director or the applicable standard to determine whether BMPs are (or will be) implemented.
  8. Any requests for a monitoring waiver (or a renewal of an approved monitoring waiver) for a pollutant neither present nor expected to be present in the discharge must include new sampling showing (continued) absence of the pollutant in the raw wastewater and satisfying Section 6.4(B).
  9. Any request to be covered by a general permit shall satisfy Section 4.6.
  10. Any other information deemed necessary by the Executive Director to evaluate the situation and prepare a discharge permit.
- B. Incomplete or inaccurate applications will not be processed and will be returned to the User for revision. The Executive Director shall be held harmless for delays caused by returned applications.

#### **4.6 General Permits**

- A. The [City or County] may use general permits to control discharges to the POTW from all Users. Users covered by a general permit will be those that the Executive Director finds:
  1. Involve the same or substantially similar types of operations.
  2. Discharge the same types of wastes.
  3. Require the same effluent limitations.

4. Require the same or similar monitoring.
  5. Are more appropriately controlled under a general permit.
  6. Are not subject to production-based standards, mass limits, or require use of the Combined Wastestream Formula to calculate limits.
- B. To be covered by the general permit, the User must file a written request for coverage. The request must identify contact information, production processes, types of wastes generated, the general permit under which coverage is requesting, and the basis for believing the general permit is applicable. The User must also identify the location for monitoring all wastes covered by the general permit. If requesting a monitoring waiver, the application must provide information showing Section 6.4(B) has been complied with. The User must also provide any other information the Executive Director has requested to properly evaluate the situation. A monitoring waiver is not effective until the Executive Director has provided written notice granting the waiver.
- C. The Executive Director will retain the following for three (3) years after the expiration of the general permit. A copy of the general permit, the fact sheet, each User's request for coverage, and the POTW's determination to extend coverage to each User.

#### **4.7 Application Signatories and Certifications**

- A. All survey forms, wastewater discharge permit applications, and User reports must be signed by an authorized representative of the User and contain the certification statement in Section 6.14(A).
- B. Users shall submit a new authorization if the designation of an authorized representative is no longer accurate. This includes when a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company. The User must submit the new authorization prior to or with any reports to be signed by the new authorized representative.
- C. A facility determined to be a Non-Significant Categorical Industrial User by the Executive Director pursuant to 1.4 (RR) (3) must annually submit the signed certification statement found at Section 6.14(B).

#### **4.8 Wastewater Discharge Permit Decisions**

After receipt of a complete wastewater discharge permit application, the Executive Director will determine whether or not to issue a wastewater discharge permit. The Executive Director may deny any application for a wastewater discharge permit or require additional safeguards, reports (including plans under Chapter 173-240 WAC), or information. For Users not meeting the criteria of Significant Industrial Users, the Executive Director may also waive or defer a permit, or allow discharges in the interim while a permit is being prepared.

## **SECTION 5 – WASTEWATER DISCHARGE PERMITS**

### **5.1 Wastewater Discharge Permit Duration**

The [City or County] may issue a wastewater discharge permit for a period of up to five (5) years from its effective date. Each wastewater discharge permit will indicate its expiration date.

### **5.2 Wastewater Discharge Permit Contents**

Wastewater discharge permits will include conditions the Executive Director and the [City or County] deems reasonably necessary to carry out the goals of the pretreatment program (Section 1.1), Federal and State regulations, and the requirements of this Ordinance.

A. Wastewater discharge permits will contain:

1. The permit issuance date, expiration date, and effective date;
2. A statement that the wastewater discharge permit is nontransferable without prior notification to the [City or County] and the Executive Director in accordance with Section 5.5 of this Ordinance, and provisions for furnishing the new owner or operator with a copy of the existing wastewater discharge permit;
3. Effluent limits, including Best Management Practices, based on applicable pretreatment standards and requirements to apply AKART (see Section 2.3(I));
4. The pollutants to be monitored, and specific monitoring requirements. This includes the sampling location(s), sampling frequencies, and sample types consistent with Federal, State, and local law. (see Section 2.3(J));
5. Requirements to submit certain reports (as reflected in Section 6), provide various notifications, keep records, and implement Best Management Practices;
6. The process to be used to request a waiver from monitoring for a pollutant neither present nor expected to be present in the Discharge in accordance with Section 6.4(B), or a specific waived pollutant in the case of an individual permit;
7. A statement of applicable civil and criminal penalties for violation of pretreatment standards and requirements, and any applicable compliance schedule. Such schedule may not extend the time for compliance beyond that required by applicable Federal, State, or local law;

8. Requirements to control slug discharges, including to develop, update, and implement slug discharge control plans (find required content in Section 3.4) where the Executive Director determines such plans are important to preventing accidental, unanticipated, or non-routine discharges;
9. Any monitoring, which has been conditionally waived by the Executive Director according to Section 6.4(B) but which automatically applies at any time the requirements of the conditional waiver are not met; and
10. Reapplication requirements.

B. Wastewater discharge permits may contain, but need not be limited to, the following conditions:

1. Pretreatment facilities and measures required by Section 3.1 and 3.3 of this Ordinance;
2. Limits on the average and/or maximum rate of discharge, time of discharge, and/or requirements for flow regulation and equalization;
3. Requirements to install pretreatment technology, pollution controls, or to construct appropriate containment devices to reduce, eliminate, or prevent the introduction of pollutants into the treatment works, ground, or stormwater;
4. Requirements to develop and implement of waste minimization plans to reduce the amount of pollutants discharged to the POTW;
5. Requirements to pay charges or fees for discharge to the POTW including high strength charges;
6. Requirements to install and maintain inspection and sampling facilities and equipment, including flow measurement devices;
7. Notice that compliance with the wastewater discharge permit does not relieve the permittee of responsibility for compliance with all applicable Federal and State pretreatment standards, including those which become effective during the term of the wastewater discharge permit; and
8. Other conditions as deemed appropriate by the Executive Director or the [City or County] to ensure compliance with this Ordinance, and State and Federal laws, rules, and regulations.

### **5.3 Permit Issuance Process**

- A. Public Notice: Users shall follow the procedures for public notice found in Section 2.3(G) and 2.3(H). The Executive Director shall consider and respond to public input as appropriate prior to issuance of a permit.
  
- B. Permit Appeals: The Executive Director shall provide public notice of the issuance of a wastewater discharge permit. Any person, including the User, may petition the [City or County] to reconsider the terms of a wastewater discharge permit within thirty (30) days of notice of its issuance.
  - 1. Failure to submit a timely petition for review shall be deemed to be a waiver of the administrative appeal.
  - 2. In its petition, the appealing party must indicate the wastewater discharge permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to place in the wastewater discharge permit.
  - 3. The effectiveness of the wastewater discharge permit shall not be stayed pending the appeal.
  - 4. If the [City or County] fails to act within thirty (30) days, a request for reconsideration shall be deemed to be denied. Decisions not to reconsider a wastewater discharge permit, not to issue a wastewater discharge permit, or not to modify a wastewater discharge permit shall be considered final administrative actions for purposes of judicial review.
  - 5. Aggrieved parties seeking judicial review of the final administrative wastewater discharge permit decision must do so by filing a complaint with the Superior Court of Thurston County within ten (10) days of the final administrative action.

### **5.4 Wastewater Discharge Permit Modification**

The [City or County], after consulting with the Executive Director, may modify a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- A. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements including new or revised local limits;
- B. To address new or changed operations, processes, production rates, waste streams, or changes in water volume or character;
- C. To reflect conditions at the POTW requiring an authorized discharge to be

reduced or curtailed. Such requirements may be either temporary or permanent;

- D. Based on information indicating that a permitted discharge poses a threat to the Executive Director's and/or [City or County]'s POTW or staff, the receiving waters, or to violate a prohibition of this Chapter;
- E. To address violations of any terms or conditions of the wastewater discharge permit;
- F. To address misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required report;
- G. To incorporate revisions based on a variance from categorical pretreatment standards approved pursuant to 40 CFR Part 403.13;
- H. To correct typographical or other errors in the wastewater discharge permit; or
- I. To reflect a transfer of the facility ownership or operation to a new owner or operator as required under Section 5.5.

### **5.5 Wastewater Discharge Permit Transfer**

Wastewater discharge permits may be transferred to a new owner or operator only if the permitted User gives at least thirty (30) days advance notice to the Executive Director and the [City or County], and the Executive Director and the [City or County] approves the wastewater discharge permit transfer. Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer. The notice to the Executive Director and the [City or County] must include a written certification by the new owner or operator, which:

- A. States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
- B. Identifies the specific date on which the transfer is to occur; and
- C. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

### **5.6 Wastewater Discharge Permit Revocation**

The [City or County] may revoke a wastewater discharge permit for good cause, including, but not limited to, when a User has:

- A. Failed to notify the Executive Director of significant changes to the wastewater prior to the changed discharge;

- B. Failed to provide prior notification to the Executive Director of changed conditions pursuant to Section 6.5 of this Ordinance;
- C. Misrepresented or failed to fully disclose all relevant facts in the wastewater discharge permit application;
- D. Falsified self-monitoring reports or tampered with monitoring equipment;
- E. Refused to allow the Executive Director timely access to the facility premises and records;
- F. Failed to meet effluent limitations or permit conditions;
- G. Failed to pay applicable fines or sewer charges;
- H. Failed to meet compliance schedule deadline dates;
- I. Failed to complete a wastewater survey or wastewater discharge permit application;
- J. Failed to provide advance notice of the transfer of business ownership;
- K. Violated any pretreatment standard or requirement, or any terms of the wastewater discharge permit or this Ordinance;
- L. Ceased operations; or
- M. Transferred business ownership.

Wastewater discharge permits issued to a User are void upon the issuance of a new wastewater discharge permit to that User.

### **5.7 Wastewater Discharge Permit Reissuance**

A User with an expiring wastewater discharge permit shall apply for wastewater discharge permit reissuance by submitting a complete permit application, in accordance with Section 4.5 of this Ordinance, a minimum of ninety (90) days prior to the expiration of the User's existing wastewater discharge permit.

## SECTION 6 – REPORTING REQUIREMENTS

### 6.1 Baseline Monitoring Reports

- A. When “categorical standards” for an industry category are published, Users that perform that process and either currently discharge or are scheduled to discharge wastewater from the process to the POTW, must submit a “baseline monitoring report” to the Executive Director. This report must contain the information listed in paragraph C, below. The report is due within one hundred eighty (180) days after the effective date of a categorical pretreatment standard, unless the final administrative decision on a category determination comes later.
- B. Users that wish to begin discharging wastewater to the POTW from operations subject to categorical standards after USEPA has published the standards (called New Sources), shall also submit a “Baseline Monitoring Report” to the Executive Director containing the information listed in paragraph 6.1 C. However, for New Sources, the report must be provided at least ninety (90) days before desiring to discharge. New Sources shall describe the method of pretreatment they intend to use to meet applicable categorical standards. Because monitoring data will not be available for proposed facilities, New Sources instead must provide estimates of the anticipated flow rates and quantity of pollutants to be discharged.
- C. The Baseline Monitoring Report shall include the following information:
1. All information required in Section 4.5.A(1-7).
  2. Additional Conditions for Existing Sources Measuring pollutants:
    - a. Users shall take a minimum of one representative sample to compile the data for the Baseline Monitoring Report.
    - b. Users shall take samples immediately downstream from pretreatment facilities if such exist or immediately downstream from the regulated process if no pretreatment exists. If the User mixes other wastewaters with the regulated wastewater prior to pretreatment, the User must provide the flows and concentrations necessary to apply the combined wastestream formula of Section 2.2(C) and 40 CFR Part 403.6(e). Where the User wants an alternate concentration or mass limit, and it is allowed by Federal rules at § 403.6(e), the User shall propose the adjusted limit and provide supporting data to the Control Authority.
    - c. Sampling and analysis shall be performed in accordance with Section 6.11 (Sample Collection), and Section 6.10 (Analytical Requirements).
    - d. The Executive Director may allow the report to use only historical data

if the data is good enough to allow the evaluation of whether (and which) industrial pretreatment measures are needed;

- e. The baseline report shall indicate the time, date, and place of sampling, methods of analysis. The User shall certify that the sampling and analysis presented is representative of normal work cycles and expected pollutant discharges to the POTW.
3. Compliance Certification – A statement, reviewed by the User's authorized representative as defined in Section 1.4(D) and certified by a qualified professional, such as a Professional Engineer indicating whether pretreatment standards are being met on a consistent basis, and, if not, whether additional operation and maintenance (O&M) and/or additional pretreatment steps are required to meet the pretreatment standards and requirements.
4. Compliance Schedule – While New Sources must install the treatment required to meet the Pretreatment standards prior to operation, Existing Sources may be granted a compliance schedule where they must provide additional pretreatment and/or O&M to meet the pretreatment standards. In such cases, the User shall propose the shortest schedule by which they can provide the additional pretreatment and/or O&M. The completion date, which the User proposes in this schedule may not be later than the compliance date established for the applicable pretreatment standard. Any compliance schedule authorized pursuant to this Section must also meet the requirements set out in Section 6.2 of this Ordinance.
5. Signature and Report Certification – All baseline monitoring reports must be certified in accordance with Section 6.14(A) of this Ordinance and signed by an authorized representative as defined by Section 1.4(D).

## **6.2 Compliance Schedule Progress Reports**

The following conditions shall apply to compliance schedules proposed by Existing Sources according to Section 6.1(C)(4) of this Ordinance and incorporated into permits:

- A. The schedule shall contain progress increments in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the User to meet the applicable pretreatment standards (such events include, but are not limited to, hiring an engineer, completing preliminary and final plans, executing contracts for major components, commencing and completing construction, and beginning and conducting routine operation);
- B. No increment referred to above shall exceed nine (9) months;

- C. The User shall submit a progress report to the Executive Director no later than fourteen (14) days following each date in the schedule and the final date of compliance including, as a minimum, whether or not it complied with the increment of progress, the reason for any delay, and, if appropriate, the steps being taken by the User to return to the established schedule; and
- D. In no event shall more than nine (9) months elapse between such progress reports to the Executive Director.

### **6.3 Reports on Compliance with Categorical Pretreatment Standard Deadline**

Both Existing Sources and New Sources must submit a report on whether compliance has been initially achieved. For Existing Sources, the report is due ninety (90) days after the date applicable categorical standards give as the final compliance date. For a new source, the report is due 90 days after starting to discharge to the POTW.

In both cases, the report must contain the information described in Sections 4.5(A)(3-6). For existing sources, it must also contain the compliance certification of 6.1(C)(3) and, if needed, the compliance schedule described in Section 6.1(C)(4). Users subject to equivalent mass or concentration limits, as allowed by Section 2.2, must include a reasonable measure of their long-term production rate. Other Users subject to standards based on a unit of production (or other measure of operation) must include their actual production during the sampling period. All compliance reports must be signed and certified in accordance with Section 6.14(A) of this Ordinance.

### **6.4 Periodic Compliance Reports**

- A. The Executive Director may specify the necessary minimum sampling and reporting frequencies and include applicable requirements in permits issued by the [City or County]. Significant Industrial Users (SIUs), except those recognized as “middle tier” Users under Section 6.4(C), must:
  - 1. Report at least twice a year, in June and December unless otherwise specified;
  - 2. Report the flows and concentrations of regulated pollutants in all discharges subject to pretreatment standards;
  - 3. Report average and maximum daily flows for the reporting period and identify where flow estimates are used; and
  - 4. Include the documentation needed to show compliance with applicable BMPs, pollution prevention alternatives, maintenance, treatment, or record keeping requirements.
- B. The Executive Director may authorize a CIU to forego sampling of a pollutant

regulated by a categorical Standard when it is not present in raw wastewater provided:

1. The CIU submits a request for the waiver with their permit application or reapplication (see Section 4.5(A)(8));
2. The CIU analyzes a sample (or samples) representative of all wastewater from all processes before any treatment and includes all results with the request;
3. The CIU demonstrates through source water and untreated process water sample results that the pollutant never exceeds intake water levels. (Pollutants simply reduced by treatment to background levels are ineligible for the waiver.);
4. The CIU shows, where non-detectable sample results are returned in (2) or (3), that they used the method from 40 CFR Part 136 with the lowest detection level;
5. The duly authorized representative of the CIU signs the request using the certification statement of Section 6.14(A);
6. The CIU includes, in routine monitoring reports, the statement in Section 6.14(C), certifying that there has been no increase in the pollutant in its waste stream due to activities of the Industrial User; and
7. The CIU reports and immediately resumes the monitoring, which would otherwise have been required upon discovering that a waived pollutant is present or expected to be present based on changes to the User's operations

The Executive Director will document the reasons supporting the waiver in the Permit Fact Sheet, and keep any information submitted by the User and the fact sheet for three (3) years after the waiver expires. Monitoring waivers are valid after being incorporated in a User's permit. The waiver is in effect while the Permit is effective, up to five (5) years. The Executive Director may cancel a monitoring waiver at any time for cause.

- C. The Executive Director may reduce the minimum periodic compliance reporting frequency for CIU's from twice a year (Section 6.4(A)) to once a year where the CIU:
  1. Discharges wastewater subject to categorical standards at a rate less than one gallon per every ten thousand (10,000) gallons of POTW design maximum monthly average flow capacity (per LOTT's NPDES permit). The CIU must measure their discharge using a continuous (or totalizing)

effluent flow meter. If the CIU discharges in batches, the Executive Director will determine eligibility by dividing total flows in all batches, which contain any proportion subject to categorical regulation by the number of days the CIU is in full operation in a given calendar month.

2. Discharges less than five thousand (5,000) gallons of wastewater subject to categorical standards on the maximum day (including batch dischargers).
  3. Discharges categorical wastewater with less than one pound of Biochemical Oxygen Demand per each ten thousand (10,000) pounds of POTW loading capacity. POTW loading capacity is the design maximum monthly average Biochemical Oxygen Demand loading capacity per LOTT's NPDES permit (or if not included in the permit, in approved Executive Director plans).
  4. Discharges less than 0.01 percent of the maximum allowable headworks loading for any pollutant regulated by both an applicable Categorical Standard and a local limit in Section 2.4 of this Ordinance.
  5. Has not been in Significant Noncompliance as defined in this Ordinance during the prior two (2) years.
  6. Has daily flow rates, production levels, or pollutant levels that are consistent enough the Executive Director believes will allow representative data at the decreasing reporting interval.
- D. Users must sign and certify all periodic compliance reports in accordance with Section 6.14(A) of this Ordinance.
- E. Users must take wastewater samples, which are representative of their range of discharge conditions and of any discharge not disclosed in their permit application. Users must properly operate, clean, and maintain sampling and flow metering facilities and devices and ensure they function properly. The Executive Director may not allow User claims that sampling results are unrepresentative due to a Users failure to meet this requirement.
- F. Users subject to the reporting requirements in this Section must report any additional monitoring, which might determine compliance with permit requirements. This includes any additional monitoring of regulated pollutant at their respective effluent monitoring locations using procedures prescribed in Section 6.11 of this Ordinance. In such cases, the results of this monitoring shall be included in periodic monitoring reports.
- G. Users that send electronic (digital) documents to the Executive Director to satisfy the requirements of this Section must meet all State and Federal electronic

signature requirements: electronic data shall be in the format required by the Executive Director. The Executive Director may also require reporting in both digital and traditional format.

## **6.5 Reports of Changed Conditions**

Each User must notify the Executive Director of any significant changes to the User's operations or system, which might alter the nature, quality, or volume of its wastewater. This notification must be made at least thirty (30) days before the desired change and be sent to both the Control Authority (Executive Director) and the receiving POTW if they are different. In such cases:

- A. The Executive Director may require the User to submit whatever information is needed to evaluate the changed condition. The Executive Director may also require a new or revised wastewater discharge permit application under Section 4.5 of this Ordinance.
- B. The [City or County] may issue, reissue, or modify a wastewater discharge permit applying the procedures of Chapter 5 of this Ordinance in response to a User's notice under this Section.

## **6.6 Reports of Potential Problems**

- A. Any User, which has any unusual discharge that could cause problems to the POTW must immediately notify the Executive Director by telephone of the incident. This notification shall include the location of the discharge, type of waste, concentration and volume, if known, and corrective actions taken by the User to control and curtail the discharge. Such discharges may include spills, slug loads, accidental discharges, or other discharges of a non-routine, episodic nature. Problems to the POTW, which require reporting under this Section include violating pretreatment prohibitions, treatment standards, or other requirements of Chapter 2 of this Ordinance such as vapor toxicity and explosivity limits.
- B. Within five (5) days following such discharge, the User shall submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the User to prevent similar future occurrences. Such notification shall not relieve the User of any expense, loss, damage, or other liability, which may be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the User of any fines, penalties, or other liability, which may be imposed pursuant to this Ordinance.
- C. Regardless of whether the User has been required to submit a Slug Discharge Control Plan (per Section 3.4), all Users shall post notice in a prominent location advising employees who to call at the POTW to inform the Executive Director of

a potential problem discharge (Section 6.6(A)). Users shall ensure that all employees who may cause or witness such a discharge are advised of the emergency notification procedures.

- D. All Users must immediately notify the Executive Director of any changes at their facility, which might increase their potential for a slug discharge. This includes increasing the volume of materials stored or located on site, which, if discharged to the POTW, would cause problems. Users required to prepare a Slug Discharge Control Plan under Section 3.4 shall also modify their plans to include the new conditions prior to, or immediately after making such changes.

### **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.

### **6.8 Notice of Violation/Repeat Sampling and Reporting**

If sampling performed by a User indicates a violation, the User must notify the Executive Director within twenty-four (24) hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Executive Director within thirty (30) days after becoming aware of the violation. The Executive Director may waive the repeat sampling requirement where the Executive Director has sampled the effluent for the pollutant in question prior to the User obtaining sampling results.

### **6.9 Notification of Discharge of Hazardous Waste**

- A. Any User who discharges any substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261, or Chapter 173-303 WAC must also comply with the following requirements:
1. Notify the Executive Director, the USEPA Regional Waste Management Division Director, and State hazardous waste authorities, in writing, of the discharge. Maintain a copy of this notification and include it in all subsequent permit application or re-applications under this Chapter.
  2. Include the following information in the notification:
    - a. The name of the hazardous waste as found in 40 CFR Part 261;
    - b. The USEPA hazardous waste number; and
    - c. The type of discharge (continuous, batch, or other).

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3. If the discharge totals more than two hundred and twenty (220) pound in any month, also provide:
    - a. The hazardous constituents contained in the wastes,
    - b. An estimate of the mass and concentration of hazardous constituents in the wastestream discharged during that calendar month, and
    - c. An estimate of the mass of constituents in the wastestream expected to be discharged during the following twelve (12) months.
  4. This notice shall be repeated for new or increased discharges of substances subject to this reporting requirement.
  5. All notifications must take place prior to discharging a substance for which these reporting requirements apply. If this is not possible, the notice must be provide as soon after discharge as practical and describe why prior notice was not possible.
  6. Users must provide notifications under this paragraph only once to USEPA and the State for each hazardous waste discharged. However, all of the information of these notices shall be repeated in each new permit application submitted under this Chapter.
  7. This requirement does not relieve the User from requirements to provide other notifications, such as of changed conditions under Section 6.5 of this Ordinance, or applicable permit conditions, permit application requirements, and prohibitions.
  8. The notification requirements in this Section do not apply to pollutants for which routine monitoring and reporting is required in a permit under this Ordinance.
- B. Users must report all discharges of more than thirty-three (33) pounds per month of substances, which, if otherwise disposed of, would be hazardous wastes. Users must also report any discharge of acutely hazardous wastes as specified in 40 CFR Parts 261.30(d) and 261.33(e). Subsequent months during which the User discharges more of a hazardous waste for which notice has already been provided do not require another notification to USEPA or the State, but must be reported to the Executive Director.
- C. If new regulations under RCRA describe additional hazardous characteristics or substances as a hazardous waste, the User must provide notifications under paragraphs A, if required by paragraph B within ninety (90) days of the effective date of such regulations.

- D. For any notification made under this Section, the User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical and shall describe that program and reductions obtained through its implementation.
- E. This provision does not create a right to discharge any substance not otherwise permitted to be discharged by this Ordinance, a permit issued thereunder, or any applicable Federal or State law.

### **6.10 Analytical Requirements**

All pollutant sampling and analyses required under this Ordinance shall conform to the most current version of 40 CFR Part 136, unless otherwise specified in an applicable categorical pretreatment standard. If 40 CFR Part 136 does not contain sampling or analytical techniques for a pollutant, or the Executive Director determines that the Part 136 sampling and analytical techniques are inconsistent with the goal of the sampling, the Executive Director may specify an analytical method. If neither case applies, Users shall use validated analytical methods or applicable sampling and analytical procedures approved by USEPA.

### **6.11 Sample Collection**

Users must ensure all samples they collect to satisfy sampling requirements under this Ordinance are representative of the range of conditions occurring during the reporting period. Users must also ensure that, when specified, samples are collected during the specific period.

- A. Users must use properly cleaned sample containers appropriate for the sample analysis and sample collection and preservation protocols specified in 40 CFR Part 136 and appropriate USEPA guidance.
- B. Users must obtain samples for oil and grease, temperature, pH, cyanide, total phenols, sulfides, and volatile organic compounds using grab collection techniques.
- C. For certain pollutants, Users may composite multiple grab samples taken over a 24-hour period. Users may composite grab samples for cyanide, total phenols, and sulfides either in the laboratory or in the field, and may composite grab samples for volatile organics, and oil & grease in the laboratory prior to analysis.
- D. For all other pollutants, Users must employ 24-hour flow-proportional composite samplers unless the Executive Director authorizes or requires an alternative sample collection method.
- E. The Executive Director may authorize composite samples for parameters unaffected by the compositing procedures, as appropriate.

- F. The Executive Director may require grab samples either in lieu of or in addition to composite sampling to show compliance with instantaneous discharge limits.
- G. In all cases, Users must take care to ensure the samples are representative of their wastewater discharges.
- H. Users sampling to complete baseline monitoring and 90-day compliance reports required by Section 6.1 and 6.3, must satisfy some specific requirements. These reports require at least four (4) grab samples for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. Users may composite samples prior to analysis if allowed in 6.11.C. Where historical sampling data exists the Executive Director may also authorize fewer samples.
- I. For periodic monitoring reports (Section 6.4), the Executive Director may specify the number of grab samples necessary to assess and assure compliance with applicable pretreatment standards and requirements.

#### **6.12 Date of Receipt of Reports**

The Executive Director will credit written reports as having been submitted on the date of the post mark when mailed through the United States Postal Service. Reports delivered in any other manner will be credited as having been submitted on the business day received.

#### **6.13 Record Keeping**

Users subject to reporting requirements of this Ordinance shall retain the below records for all monitoring required by this Ordinance and for any additional monitoring, which could be used to satisfy minimum monitoring requirements. Users must make these records available for inspection and copying at the location of the discharge. Users must similarly maintain documentation associated with any Best Management Practices required under authority of Section 2.4(C). Monitoring records shall include at least:

- A. The time, date, and place of sampling;
- B. The sampling and preservation methods used;
- C. The person taking the sample, and persons with control of the sample prior to analysis;
- D. The person performing the analyses and the date the analysis was completed;
- E. The analytical techniques or methods used; and
- F. The results of analysis.

Users are encouraged to retain quality control and quality assurance information provided by the laboratory and submit this information in routine reporting. This information also has value in the event that the sample data is called into question. For analytes for which Washington State requires use of a certified/accredited laboratory, Users must maintain the scope of accreditation for laboratories performing any analyses for them.

Users shall maintain the above records for at least three (3) years, until any litigation concerning the User or the [City or County], or the Executive Director is complete, or for longer periods when the User has been specifically notified of a longer retention period by the Executive Director.

#### **6.14 Certification Statements**

A. The following certification statement must be signed by an authorized representative as defined by Section 1.4(D) and included when submitting:

1. A permit (re-)application in accordance with Section 4.7;
2. A Baseline Monitoring Report under Section 6.1(C)(5);
3. A report on compliance with the categorical pretreatment standard deadlines under Section 6.3;
4. A periodic compliance report required by Section 6.4(A-D); or
5. An initial request to forego sampling of a pollutant based on Section 6.4(B)(5).

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

B. Annual Certification for Non-Significant Categorical Industrial Users

A facility determined to be a Non-Significant Categorical Industrial User by the Executive Director pursuant to 1.4 (RR)(3) and 4.7 C must complete the below statement and submit it to the Executive Director annually. The statement must be signed by an authorized representative (Section 1.4(D)):

“Based on my inquiry of the person or persons directly responsible for managing compliance with the categorical Pretreatment Standards under 40 CFR \_\_\_\_\_, I certify that, to the best of my knowledge and belief that during the period from \_\_\_\_\_, \_\_\_\_\_ to \_\_\_\_\_, \_\_\_\_\_ [months, days, year]:

(a) The facility described as \_\_\_\_\_ [facility name] met the definition of a Non-Significant Categorical Industrial User as described in 1.4 FF (3) [40 CFR 403.3(v)(2)]; (b) the facility complied with all applicable Pretreatment Standards and requirements during this reporting period; and (c) the facility never discharged more than 100 gallons of total categorical wastewater on any given day during this reporting period.

This compliance certification is based upon the following information.

\_\_\_\_\_  
\_\_\_\_\_“

C. Certification of Pollutants Not Present

Users that have an approved monitoring waiver based on Section 6.4(B) must also include the following certification statement in each report. This statement certifies that there has been no increase in the pollutant in its wastestream due to activities of the User:

“Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for 40 CFR \_\_\_\_\_ [specify applicable National Pretreatment Standard part(s)], I certify that, to the best of my knowledge and belief, there has been no increase in the level of \_\_\_\_\_ [list pollutant(s)] in the wastewaters due to the activities at the facility since filing of the last periodic report under Section 6.4.A.”

## **SECTION 7 – COMPLIANCE MONITORING**

### **7.1 Right of Entry: Inspection and Sampling**

The Executive Director shall have the right to enter the premises of any User to determine whether the User is complying with all requirements of this Ordinance and any wastewater discharge permit or order issued hereunder. Users shall allow the Executive Director ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

- A. Where a User has security measures in force, which require proper identification and clearance before entry into its premises, the User shall make necessary arrangements with its security guards so that, upon presentation of suitable identification, the Executive Director will be permitted to enter without delay for the purposes of performing specific responsibilities.
- B. The Executive Director shall have the right to set-up on the User's property, or require installation of, such devices as are necessary to conduct sampling and/or metering of the User's operations.
- C. Users shall provide full access to the Executive Director to use any monitoring facilities and utilities available or required in accordance with Section 3.1 and Section 3.3(E) and (F) to confirm that the standards or treatment required for discharge to the sewer are being met.
- D. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the User at the written or verbal request of the Executive Director and shall not be replaced. The costs of clearing such access shall be born by the User.
- E. Any unreasonable delay in allowing the Executive Director full access to the User's premises and wastewater operations shall be a violation of this Ordinance.

### **7.2 Search Warrants**

The [City or County], on behalf of the Executive Director, may seek issuance of a search warrant from the Superior Court of Thurston County. Such warrants may be secured when:

- A. The Executive Director has been refused access or is unable to locate a representative who can authorize access to a building, structure, or property, or any part thereof, and has probable cause that a violation of this Ordinance is occurring on the premises;
- B. The Executive Director has been denied access to inspect and/or sample as part

of a routine inspection and sampling program of the Executive Director designed to verify compliance with this Ordinance or any permit or order issued hereunder;  
or

- C. The Executive Director has cause to believe there is imminent endangerment of the overall public health, safety, and welfare of the community by an activity on the premises.

## SECTION 8 – CONFIDENTIAL INFORMATION

Generally, information submitted to demonstrate compliance with pretreatment standards and requirements will be freely available to the public. To the extent such is consistent with State and Federal laws, Users may have certain information treated as confidential if the following process is followed.

- A. When a User submits information to the Executive Director or [City or County], or provides information to inspectors, Users may request that specific information be maintained as confidential. Users must promptly identify the specific information in writing, and describe why the release would divulge information, processes, or methods of production entitled to protection as trade secrets or confidential business information under applicable State or Federal laws.
- B. Dependent on the agency receiving the request, the Executive Director or the [City or County] shall review and approve or deny such requests. When approved, the information shall not be publicized by the [City or County] unless required by State or Federal law.
- C. All other information submitted to the Executive Director or the [City or County] and obtained from the Executive Director's or the [City or County]'s oversight shall be available to the public subject to the Executive Director or the [City or County] records review policy.
- D. Information held as confidential may not be withheld from governmental agencies for uses related to the NPDES program or pretreatment program, or in enforcement proceedings involving the person furnishing the report.
- E. Federal rules prevent wastewater constituents and characteristics and other effluent data, as defined by 40 CFR Part 2.302 from being recognized as confidential information.

**SECTION 9 – PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE**

- A. **PUBLISHING:** The Executive Director must annually publish a list of the Users, which, at any time during the previous twelve (12) months, were in Significant Noncompliance with applicable pretreatment standards and requirements. The list will be published in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the POTW.
- B. **DEFINITION:** The term Significant Noncompliance means:
1. Any violation of a pretreatment standard or requirement including numerical limits, narrative standards, and prohibitions, which the Executive Director determines has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of POTW personnel or the general public.
  2. Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Executive Director's or [City or County]'s exercise of its emergency authority to halt or prevent such a discharge.
  3. Any violation(s), including of Best Management Practices, which the Executive Director determines will adversely affect the operation or implementation of the local pretreatment program.
  4. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same pollutant parameter taken during a rolling six (6) month period exceed, by any magnitude, a numeric pretreatment standard or requirement, including instantaneous limits of Section 2.
  5. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a rolling six (6) month period equal or exceed the product of the numeric pretreatment standard or requirement, (including instantaneous limits, as defined by Section 2), multiplied by the applicable criteria. Applicable criteria are 1.4 for Biochemical Oxygen Demand, Total Suspended Solids, fats, oils and greases, and 1.2 for all other pollutants except pH.
  6. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance.
  7. Failure to provide any required report within forty-five (45) calendar days

after the due date. This includes initial and periodic monitoring reports, and reports on initial compliance and on meeting compliance schedules.

8. Failure to accurately report noncompliance.

C. **APPLICABILITY:** The criteria in Sections 9(B)(1-3) are applicable to all Users, whereas the criteria in Sections 9(B)(4-8) are only applicable to SIUs.

## **SECTION 10 – ADMINISTRATIVE ENFORCEMENT REMEDIES**

In administering the LOTT Pretreatment Program, the Executive Director is obliged to follow the LOTT Pretreatment Program's approved procedures. In response to noncompliance with any requirement of this Ordinance, the Executive Director shall apply the LOTT Enforcement Response Plan, which is a part of these approved procedures. This plan ensures that the application of remedies provided for in Sections 10, 11, and 12 of this Ordinance is appropriate to the violation, and consistent with the treatment of other Users. Any person may review or obtain a copy (for a nominal charge) of the Enforcement Response Plan by contacting the Executive Director.

### **10.1 Notification of Violation**

The [City or County] may serve a written Notice of Violation on any User that the [City or County] and/or the Executive Director finds has violated any provision of this Ordinance, including terms or requirements of a permit, order, or a pretreatment standard or requirement. In all cases in this Ordinance, a continuation of a violation of a provision of this Ordinance is a "violation." Users shall, in response to a Notice of Violation, provide the [City or County] a written explanation of the violation, its cause, and a corrective action plan within seven (7) days of the receiving this notice. Users submitting plans to correct noncompliance must include the specific actions they will take to correct ongoing and prevent future violations at the soonest practicable date. The [City or County]'s acceptance of a plan does not relieve a User of liability for any violations. The [City or County] may also take any action, including emergency actions or any other enforcement action, without first issuing a Notice of Violation.

### **10.2 Consent Orders**

The [City or County] may enter into a Consent Order or other voluntary agreement to memorialize agreements with Users violating any requirement of this Ordinance after consultation with the Executive Director. Such agreements must include the specific action(s) required and date(s) they are to be completed to correct the noncompliance. Such documents must be constructed in a judicially enforceable manner, and have the same force and effect as administrative orders issued pursuant to Sections 10.4 and 10.5 of this Ordinance.

### **10.3 Show Cause Hearings and Appeal Hearings**

#### **A. Show Cause Hearing**

After consultation with the Executive Director, the [City or County] may propose actions in response to a violation of any provision of this Ordinance, including a provision of a permit, order, or a pretreatment standard or requirement. The [City or County] may offer a User in violation the opportunity to appear at a date, time, and location set by the [City or County] to show why the proposed enforcement action should not be initiated. The [City or County] will notify the User of the violation, the proposed action, the

rationale, and the Users rights and obligations to provide evidence why the proposed enforcement action should not be taken, and to provide its support for any alternative it proposes at this meeting.

A Show Cause Hearing shall not be a bar against, or prerequisite for, taking any other action against the User.

#### B. Appeal Hearing

A User has the right to an appeal hearing to contest the [City or County]'s enforcement action provided for by this Ordinance or determination that the User has violated a compliance schedule.

A User may submit a request for an appeal hearing in writing within fifteen (15) business days after the User receives notice of the [City or County]'s action or determination, to show why the enforcement action should not be taken, or why the determination was in error. The User's written request for hearing shall be filed with the Executive Director.

The [City or County] will respond to an appeal hearing request in writing within fifteen (15) business days after the [City or County] receives the appeal hearing request. The response will include the date, time, and location of the appeal hearing.

A request for an appeal hearing is not a good faith effort to achieve compliance, does not delay any compliance schedules or requirements, and will not be considered mitigating unless the User demonstrates at the hearing sufficient cause as to why an enforcement action should not proceed, or why the determination was in error, but then only with respect to the enforcement action or determination on which the User demonstrates sufficient cause.

Hearings authorized by this Section shall be held before the LOTT Technical Sub-Committee (TSC). Formal rules of evidence shall not apply, but the User and the [City or County] shall have the right to present witnesses and other evidence. The TSC shall issue a written decision within fourteen (14) business days of the conclusion of the hearing.

Any User may make an electronic or stenographic record of the proceedings. Such record shall be made at the User's expense.

The TSC may by resolution or ordinance adopt additional rules for the conduct of hearings pursuant to this Section.

### **10.4 Compliance Orders**

The [City or County], after consulting with the Executive Director, may issue a compliance order to any User, which has violated any provision of this Ordinance

including a requirement of a permit, order, or a pretreatment standard or requirement. The compliance order may direct that the User come into compliance within a specified time, install and properly operate adequate treatment facilities or devices, or take such measures as the [City or County] or Executive Director finds are reasonably necessary. These measures may include additional self-monitoring and management practices designed to minimize the amount of pollutants discharged to the sewer. A compliance order may not extend the deadline for compliance established for a pretreatment standard or requirement, or relieve a User of liability for any violation, including a continuing violation. If the User does not come into compliance within the time provided, sewer service may be discontinued. Issuance of a compliance order shall not be a bar against, or a prerequisite for, taking any other action against the User.

### **10.5 Cease and Desist Orders**

When [City or County] and/or Executive Director finds that a User has violated, or continues to violate, any provision of this Ordinance, a wastewater discharge permit or order issued hereunder, or any other pretreatment standard or requirement, or that the User's past violations are likely to recur, the [City or County] may, after consultation with the Executive Director, issue an order to the User directing it to cease and desist all such violations and directing the User to:

- A. Immediately comply with all requirements; and
- B. Take such appropriate remedial or preventive action as may be needed to properly address a continuing or threatened violation, including halting operations and/or terminating the discharge. Issuance of a cease and desist order shall not be a bar against, or a prerequisite for, taking any other action against the User.

### **10.6 Administrative Civil Fines**

- A. When the [City or County] finds that a User has violated, or continues to violate, any provision of this Ordinance, a wastewater discharge permit or order issued under this Ordinance, or any other pretreatment standard or requirement, the [City or County] may, after consultation with the Executive Director, fine such User in an amount not to exceed ten thousand dollars (\$10,000). Such fines may be assessed on a per violation, per day basis. In the case of monthly or other long-term average discharge limits, fines may be assessed for each day during the period of violation.
- B. The [City or County] may add the costs of any emergency response, additional monitoring, investigation, and administrative costs related to the noncompliance, including attorney's fees and costs, and the [City or County]'s response to the situation, to the amount of the fine.
- C. The [City or County] will consider the economic benefit gained by a User as a result of the noncompliance in cases where there appears to have been a

monetary benefit from not complying. In such cases, the [City or County] shall ensure that fines, to the maximum amounts allowable, exceed the benefit to the User from the noncompliance.

- D. Unpaid charges, fines, and penalties shall, at thirty (30) calendar days past the due date, be assessed an additional penalty of one percent (1%) of the unpaid balance, and interest shall accrue thereafter at a rate of one percent (1%) per month, or at the rate allowed by law if different from the foregoing. After thirty (30) days, the [City or County] shall be authorized to file a lien against the User's property for unpaid charges, fines, and penalties.
- E. A user subject to an administrative civil fine issued by the [City or County] under this section may appeal such fine as provided in section 10.3 of these Regulations.
- F. Issuance of an administrative civil fine shall not be a bar against, or a prerequisite for, taking any other action against the User.

### **10.7 Emergency Suspensions**

The [City or County] may immediately suspend a User's discharge (or threatened discharge) when it reasonably appears to present a substantial danger to the health or welfare of persons. In such cases, the [City or County] will first provide informal notice to the User. The [City or County] may also immediately suspend a User's discharge, after notice and opportunity to respond, that threatens to interfere with the operation of the POTW, or which presents, or may present, a danger to the environment.

- A. Any User notified of a suspension of its discharge shall immediately stop or eliminate its contribution. If a User fails to immediately comply voluntarily with the suspension order, the [City or County] may take such steps as deemed necessary to protect the public and its interest in the sewer system. Remedies available to the [City or County] include immediately severing the sewer connection, at the User's expense, turning off pump stations downstream of the User, and partnering with law enforcement. The [City or County] may not allow the User to recommence its discharge until the User has demonstrated to the satisfaction of the [City or County] that the situation warranting the suspension has been properly addressed and any proposed Termination proceeding has been resolved.
- B. A User that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the causes of the harmful contribution and the measures taken to prevent any future occurrence. Users shall submit this report to the [City or County] prior to the date of any show cause or termination hearing under Sections 10.3 and 10.8 of this Ordinance.

Nothing in this Section shall be interpreted as requiring a hearing prior to any Emergency Suspension under this Section.

### **10.8 Termination of Discharge**

Any User who violates the following conditions is subject to having the privilege of discharging to the public sewer system withdrawn:

- A. Discharge of non-domestic wastewater without a permit, including
  - 1. Where the appropriate permit has not been requested;
  - 2. Where the appropriate permit has not yet been issued; or
  - 3. Where the permit has been denied or revoked based on the provisions of Section 5.6 (Permit Revocation) of this Ordinance.
- B. Violation of permit terms and conditions including:
  - 1. Exceeding any permit limit;
  - 2. Failing to meet other pretreatment standards or requirements;
  - 3. Violating any prohibition; or
  - 4. Failing to properly monitor and report discharges or changed conditions.
- C. Refusal of reasonable access to the User's premises for the purpose of inspection, monitoring, or sampling (whether subject to a permit or not).
- D. Violation of the pretreatment standards and requirements in Section 2 of this Ordinance, including failure to satisfy Industrial User Survey requirements.

When the [City or County] determines this remedy is necessary and appropriate to fulfill the intentions of this Ordinance, and after consulting with the Executive Director, such User will be notified of the proposed termination of its discharge and be offered an opportunity to show cause under Section 10.3 of this Ordinance why the proposed action should not be taken. Exercise of this option by the [City or County] shall not be a bar to, or a prerequisite for, taking any other action against the User.

## SECTION 11 – JUDICIAL ENFORCEMENT REMEDIES

### 11.1 Injunctive Relief

The [City or County] may seek injunctive relief when a User has violated, or continues to violate a provision of this Ordinance, including a pretreatment standard or requirement, or a permit or order issued hereunder. In such cases, the [City or County] may petition the Superior Court of Thurston County through the [City or County]'s Attorney, or designee, for the issuance of a temporary or permanent injunction, as appropriate, which restrains or compels the specific performance of the wastewater discharge permit, order, or other requirement imposed by this Ordinance on activities of the User. The [City or County] may also seek such other action as is appropriate for legal or equitable relief (or both), including a requirement for the User to conduct environmental remediation. A petition for injunctive relief is not a bar against, or a prerequisite for, taking any other action against a User.

### 11.2 Criminal Prosecution

- A. A User who willfully or negligently violates any provision of this Ordinance, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement is, upon conviction, guilty of a misdemeanor, punishable by a fine of not more than one thousand dollars (\$1,000) per violation, per day, or imprisonment for not more than ninety (90) days, or both. Each day on which a violation under this subsection is committed constitutes a separate offense.
- B. A User who negligently introduces any substance into the POTW, which causes personal injury or property damage is, upon conviction, guilty of a misdemeanor, punishable by a fine of not more than one thousand dollars (\$1,000) per violation, per day, or imprisonment for not more than ninety (90) days, or both.
- C. A User who willfully introduces any substance into the POTW, which causes personal injury or property damage is, upon conviction, guilty of a gross misdemeanor, punishable by a fine of not more than five thousand dollars (\$5,000) per violation, per day, or imprisonment for not more than three hundred sixty four (364) days, or both. Each day on which a violation under this subsection is committed constitutes a separate offense. A User who is convicted is also subject to prosecution for violation of any other laws, which may be applicable.
- D. A User who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to this Ordinance, wastewater discharge permit, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this

Ordinance is, upon conviction, guilty of a misdemeanor punishable by a fine of not more than one thousand dollars (\$1,000) per violation, , or imprisonment for not more than ninety (90) days, or both.

- E. In the event of a second conviction under subsection A, B, or D of this Section, a User is guilty of a gross misdemeanor, punishable by a fine of not more than five thousand dollars (\$5,000) per violation, per day, or imprisonment for not more than three hundred sixty four (364) days, or both.

### **11.3 Remedies Nonexclusive**

The remedies provided for in this Ordinance are not exclusive. The [City or County] may take any, all, or any combination of these actions against a noncompliant User. Enforcement of pretreatment violations will generally be in accordance with LOTT's Enforcement Response Plan. However, the [City or County] may take other action against any User when the circumstances warrant. Further, the [City or County] is empowered to take more than one enforcement action against any noncompliant User.

## **SECTION 12 – SUPPLEMENTAL ENFORCEMENT ACTION**

### **12.1 Penalties for Late Reports**

The [City or County] may assess a penalty of up to fifty dollars (\$50) to any User for each day that a report required by this Ordinance, a permit, or order issued hereunder is late. Penalties accrue beginning the fifth (5<sup>th</sup>) day after the report is due. The [City or County]'s actions to collect late reporting penalties shall not limit the [City or County]'s authority to initiate any other enforcement action.

### **12.2 Performance Bonds**

The [City or County] may require a satisfactory bond, payable to the [City or County], in a sum not to exceed a value determined by the [City or County] and Executive Director as necessary to assure the User will achieve consistent compliance with this Ordinance. The Executive Director may require this bond as an enforcement response or as a prerequisite to issue or reissue a wastewater discharge permit. Any User who has failed to comply with any provision of this Ordinance, a previous permit or order issued hereunder, or any other pretreatment standard or requirement may be subject to this requirement. This bond may also be required of any category of User, which has led to public burdens in the past regardless of the compliance history of the particular User. The [City or County] may use this bond to pay any fees, costs, or penalties assessed to the User whenever the Users account is in arrears for over thirty (30) days. This includes the costs of cleanup of the site if the User goes out of business, sells the business to a person that does not first assume the bond, or goes bankrupt. Users may petition the [City or County] to convert their performance bond to a requirement to provide Liability Insurance, or to forego any such safeguard based on their performance. User may petition no more frequently than once in any twelve (12) month period.

### **12.3 Liability Insurance**

The [City or County] may require any User to provide liability insurance at its discretion. In such cases, Users must provide proof that the insurance is sufficient to cover any liabilities incurred under this Ordinance, including the cost of damages to the POTW and the environment caused by the User. The [City or County] may require Users to provide the proof of such insurance prior to issuing or reissuing a wastewater discharge permit.

### **12.4 Payment of Outstanding Fees and Penalties**

The [City or County] may decline to issue or reissue a wastewater discharge permit to any User who has failed to pay any outstanding fees, fines, or penalties incurred as a result of any provision of this Ordinance, a previous permit or order issued hereunder.

## **12.5 Water Supply Severance**

The [City or County] may order water service to a User severed whenever a User has violated or continues to violate any provision of this Ordinance, a permit, or order issued hereunder, or any other pretreatment standard or requirement. Users wishing to restore their service must first demonstrate their ability to comply with this Ordinance and pay the related costs of this action.

## **12.6 Public Nuisances**

A violation of any provision of this Ordinance or a permit or order issued hereunder, or any other pretreatment standard or requirement, is hereby declared a public nuisance and shall be corrected or abated as directed by the [City or County]. Any person creating a public nuisance shall be subject to the provisions of [City or County] [Municipal Code or County Code] governing such nuisances, including reimbursing the [City or County] for any costs incurred in removing, abating, or remedying said nuisance.

## **12.7 Informant Rewards**

The [City or County] or LOTT may pay up to one thousand dollars (\$1,000) for information leading to the discovery of noncompliance by a User. In the event that the information provided results in a civil penalty or an administrative fine levied against the User, the [City or County] or LOTT may disperse up to ten percent (10%) of the collected fine or penalty to the informant. However, a single reward payment may not exceed one thousand dollars (\$1,000).

## **12.8 Contractor Listing**

At the [City or County]'s or LOTT's discretion, Users, which have not achieved compliance with applicable pretreatment standards and requirements may be made ineligible to receive a contractual award for the sale of goods or services to the [City or County] or LOTT. Existing contracts for the sale of goods or services to the [City or County] or LOTT held by a User found to be in significant noncompliance with pretreatment standards or requirements may be terminated at the discretion of the [City or County] or LOTT.

**SECTION 13 – AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS****13.1 Upset**

- A. For the purposes of this Section, the word “upset” means an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond the reasonable control of the User. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- B. An upset shall constitute an affirmative defense to punitive actions in response to noncompliance with categorical pretreatment standards (Section 2.2), but not local limits (Section 2.4) when the requirements of Section 13.1(C) must be met.
- C. A User who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
1. An upset occurred and the User can identify the cause(s) of the upset.
  2. The facility was at the time being operated in a prudent and workman-like manner and was in compliance with applicable operation and maintenance procedures.
  3. Where the upset involved reduction, loss, or failure of its treatment facility (e.g. a power failure), the User controlled production of all discharges to the extent necessary to maintain compliance with categorical pretreatment standards until the facility was restored or an alternative method of treatment was provided.
  4. The User submitted the following information to the Executive Director within twenty-four (24) hours of becoming aware of the upset. When initially provided orally, the User must have provided a written report within five (5) days that includes:
    - a. A description of the indirect discharge and cause of noncompliance;
    - b. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and
    - c. Steps being taken and/or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- D. In any enforcement proceeding, the User seeking to establish the occurrence of

an upset shall have the burden of proof.

- E. Users will have the opportunity for a judicial determination on any claim of upset only in an enforcement action brought for noncompliance with categorical pretreatment standards.

### **13.2 Prohibited Discharge Standards**

A User will have an affirmative defense to an enforcement action brought against it for noncompliance with the prohibitions in Section 2.1(A) and (B)(3-7) of this Ordinance in certain cases, pursuant to 40 CFR Part 403.5(a)(2). The User must be able to prove that it did not know, or have reason to know, that its discharge, alone or in conjunction with discharges from other sources, would cause Pass Through or Interference and that either:

- A. A local limit exists for each pollutant discharged and the User was in compliance with each limit directly prior to, and during, the Pass Through or Interference; or
- B. No local limit exists, but the discharge did not change substantially in nature or constituents from the User's prior discharge when LOTT was regularly in compliance with its NPDES permit, and in the case of Interference, was in compliance with applicable sludge use or disposal requirements.

### **13.3 Bypass**

- A. For the purposes of this Section:
  - 1. Bypass means the intentional diversion of wastestreams from any portion of a User's treatment facility.
  - 2. Severe property damage means substantial physical damage to property, damage to the treatment facilities, which causes them to become inoperable, or substantial and permanent loss of natural resources, which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- B. A User may allow a bypass to occur if it does not cause pretreatment standards or requirements to be violated and is for essential maintenance to assure efficient operation.
- C. Any other bypass must meet the following requirements:
  - 1. Users knowing in advance of the need for a bypass must submit prior notice to the Executive Director, at least ten (10) days before the bypass wherever possible; and

2. Users must tell the Executive Director of any unanticipated bypass that exceeds applicable pretreatment standards within twenty-four (24) hours of becoming aware of the bypass. Users must provide a written follow-up report within five (5) days. The Executive Director may waive the written report if the oral report was timely and complete. Unless waived, the written report must contain:
    - a. A description of the bypass (volume, pollutants, etc.);
    - b. What caused the bypass;
    - c. When, specifically, the bypass started and ended;
    - d. When the bypass is expected to stop (if ongoing); and
    - e. What steps the User has taken or plans to take to reduce, eliminate, and prevent the bypass from reoccurring.
- D. Bypass is prohibited, and the [City or County] may take an enforcement action against a User for a bypass, unless:
1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
  2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass, which occurred during normal periods of equipment downtime or preventive maintenance; and
  3. The User submitted notices as required under Section 13.3(C).
- E. The Executive Director may approve an anticipated bypass, after considering its adverse effects, if the Executive Director determines that it will meet the three (3) conditions listed in Section 13.3(D).

## SECTION 14 – WASTEWATER TREATMENT SURCHARGES AND PERMIT FEES

### 14.1 Excess Strength Charges

For industrial waste or other discharges exceeding the biochemical oxygen demand (BOD), total suspended solids (TSS), or total ammonia (TA) limits defined in Section 2.4(E) of this Ordinance, the following formula shall be used to determine the equivalent residential units (ERU) equivalency of the waste flow. The Executive Director may determine that all or part of a User's industrial waste or other discharge exceeding the limits defined in Section 2.4(E) results in a net benefit to the operation of the POTW, and may grant exemptions to the User from some or all of the resulting surcharges.

This formula applies only to BOD and/or TSS concentrations in excess of 300 mg/L and total ammonia in excess of 60 mg/L.

A. ERU Equivalent for High Strength Waste shall be the sum of the following:

1. Flow Calculation:

$$(P\text{-FLOW}) \times \frac{\text{Industry flow (cu ft/ month)}}{900 \text{ cu. ft. /ERU}} = \text{FLOW ERUs}$$

2. Biochemical Oxygen Demand Calculation:

$$(P\text{-BOD}) \times \frac{\text{Industry BOD (mg/L)}}{300 \text{ mg/L}} \times \frac{\text{Industry Flow (cu ft/month)}}{900 \text{ cu ft/ERU}} = \text{BOD ERUs}$$

3. Total Suspended Solids Calculation:

$$(P\text{-TSS}) \times \frac{\text{Industry TSS (mg/L)}}{300 \text{ mg/L}} \times \frac{\text{Industry Flow (cu ft/month)}}{900 \text{ cu ft/ERU}} = \text{TSS ERUs}$$

4. Total Ammonia Calculation:

$$(P\text{-TA}) \times \frac{\text{Industry TA (mg/L)}}{60 \text{ mg/L}} \times \frac{\text{Industry Flow (cu ft/month)}}{900 \text{ cu ft/ERU}} = \text{TA ERUs}$$

B. Explanation of terms

1. (P-FLOW) = Percentage treatment costs associated with hydraulic flow, equal to twenty-nine percent (29%)
2. (P-BOD) = Percentage treatment costs associated with biochemical oxygen demand, equal to thirty-four percent (34%)
3. (P-TSS) = Percentage treatment costs associated with total suspended

solids, equal to twenty-two percent (22%)

4. (P-TA) = Percentage treatment costs associated with total ammonia, equal to fifteen percent (15%)
5. ERU: (Equivalent Residential Unit) = to 900 cubic feet of wastewater containing a maximum of 300 mg/L of total suspended solids, a maximum of 300 mg/L of biochemical oxygen demand, and a maximum of 60 mg/L of total ammonia.
6. The percentage of treatment costs used in items Sections 14.1(B)(1)–(4) are calculated based on an average of documented treatment costs.
7. All monthly charges per ERU established by 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,” as amended, shall apply to ERU's calculated by the preceding formulas.

**14.2. Discharge Permit Fees**

Annual discharge permit fees shall be levied on each Significant Industrial User (SIU) and each Minor Industrial User (MIU) based on three criteria: (1) permitted flow rate; (2) permit complexity; and (3) potential danger to the collection system or POTW. Each permitted User will be evaluated annually by the Executive Director and placed in one of three categories; with Category III having the highest combination of flow, complexity, and risk. The Executive Director shall use the Permit Fee Category Criteria set forth in the following table.

PERMIT FEE CATEGORY CRITERIA

CRITERION	RANGE	DESCRIPTION	SCORE
Flow	High	>25,000 gpd	3
	Medium	1,000 – 25,000 gpd	2
	Low	<1,000 gpd	1
Complexity	High	Categorical SIU	3
	Medium	Non-Categorical SIU	2
	Low	MIU	1
Potential Danger	High	Excess Strength Discharge, High Spill Potential, Large Quantity Of Toxic Materials, High Flows	3
	Medium	All Others	2
	Low	Low Spill Potential, No Excess Strength, Low Or No Toxics On Site, Low Flows	1

The total scores for all criteria determines the permit category and fee according to the following table.

PERMIT FEES  
2005 BASE YEAR

SCORE	CATEGORY	FEE
3-4	I	\$240
5-7	II	\$360
8-9	III	\$480

These fees shall be adjusted each calendar year for inflation by an amount equal to ninety (90) percent of the change in the Seattle-Tacoma-Bremerton area Consumer Price Index for Urban Wage and Clerical Workers (CPI-W), as published by the United States Department of Commerce Bureau of Labor Statistics, for the preceding twelve (12) month period. These discharge permit fees are in addition to the excess strength charges required in this Section, and shall be collected by the [City or County] and remitted to the LOTT Fund prior to the end of the calendar month following collection. To encourage reduction in the use of water and generation of wastewater, the annual discharge permit fee will be waived for any permitted User that achieves zero industrial wastewater discharge to LOTT in the prior calendar year.

## **SECTION 15 – MISCELLANEOUS PROVISIONS**

### **15.1 Pretreatment Charges and Fees**

The [City or County] or LOTT may adopt reasonable fees for reimbursement of costs of operating LOTT's Pretreatment Program, which may include:

- A. Fees for wastewater discharge permit applications including the cost of processing such applications;
- B. Fees for monitoring, inspection, and surveillance procedures including the cost of collection and analyzing a User's discharge, and reviewing monitoring reports submitted by Users;
- C. Fees for reviewing and responding to accidental discharge procedures and construction;
- D. Fees for filing appeals;
- E. Fees to recover administrative and legal costs (not included in Section 15.1(B)) associated with the enforcement activity taken by the [City or County] to address User noncompliance; and
- F. Other fees as the [City or County] or LOTT may deem necessary to carry out the requirements contained herein. These fees relate solely to the matters covered by this Ordinance and are separate from all other fees, fines, and penalties chargeable by the [City or County] or LOTT.

### **15.2 Severability**

If any provision, paragraph, word, section or article of this Ordinance is invalidated by any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections, and chapters shall not be affected and shall continue in full force and effect.

### **15.3 Conflict**

All other previously issued Ordinances and parts of other Ordinances inconsistent or conflicting with any part of this Ordinance are hereby repealed to the extent of such inconsistency or conflict.

**SECTION 16 – EFFECTIVE DATE**

This Ordinance shall be in full force and effect immediately following its passage, approval, and publication, as provided by law.

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

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**Attachment 5.2 A**            Industrial User Tracking

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

### 5.1 INTRODUCTION

This plan describes the enforcement response mechanisms available to the Pretreatment Program under the Pretreatment Ordinance. This plan also contains guidelines for the use of the various enforcement response mechanisms. To ensure compliance with the Pretreatment Ordinance, the LOTT Facility Manager (FM) or LOTT Environmental Program Manager (EPM) may combine enforcement mechanisms and/or increase the level of response above those listed in the guidelines when needed.

### 5.2 INVESTIGATION OF NONCOMPLIANCE

#### A. Discovery

Instances of non-compliance with pretreatment requirements or other discharge regulations may be discovered through:

- Review of Industrial User (IU) self-monitoring reports.
- Reports of plant or collection system problems.
- POTW waste-stream and sludge sampling.
- Routine site visits.
- LOTT's annual compliance sampling of IUs.
- Information from citizens and/or employees.
- IU reports of non-compliance.
- IU reports of spills/slug discharges.
- IU reports of bypasses and/or upsets.
- Review of submittals for missed compliance schedule milestones or incomplete/late reports.
- Review of records regarding compliance schedules, orders, and required reports and/or actions.

The FM or EPM will review any reported violations to corroborate the initial report and determine the nature of the violation. A variety of mechanisms are available to assist in the investigation of non-compliance, as described in the following sections.

#### B. Compliance Data Tracking

##### Discharge Monitoring Results (Permitted IUs)

IU self-monitoring and POTW monitoring reports are tracked using spreadsheets in the "Rform" Excel database shown in Attachment 2.4 A. The spreadsheet

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

compares data entered from IU self-monitoring and POTW sampling to discharge limitations established in permits, ordinances, and administrative orders.

The spreadsheet is used to evaluate the reported data for violations of pretreatment standards, exceedances of technical review or chronic criteria, and missing data. All exceedances are highlighted in bold with explanatory notes for quick reference. At the end of each quarter, the spreadsheet is used to evaluate the past six months' data for significant noncompliance (SNC). A separate column is used to indicate SNC status, and any SNC finding is explained in a cell note.

The "Rform" spreadsheets serve as the basis for the SIU Compliance Comparisons form, which is included in the annual pretreatment report submitted to Ecology. The database can also generate custom reports for various needs.

### Reporting requirements (Permitted IUs and Discharge Authorizations)

IU compliance with reporting deadlines and other key requirements is tracked using an IU tracking spreadsheet (Attachment 5.2 A) located in the "PT Info" Excel database. This database also contains reminders for important dates, such as permit renewal deadlines and application due dates to LOTT.

Reports and other items are entered into the spreadsheet for each permitted IU throughout the year, including scheduled and unscheduled site-visit dates. The PT Info database is also used to track reporting and sampling requirements for IUs with discharge authorizations.

### Surveys and Compliance (Non-Permitted MIUs)

IU surveys and compliance issues discovered during inspections of non-permitted IUs are tracked using an Access database. The Access database is used to track when a survey is mailed, the date that it was returned, the contents of the survey, and if follow-up is merited. Similarly, MIU inspection dates and findings are entered into the Access database. Any follow-up requirements may also be tracked in the database. When the survey, inspection, or compliance issue is completed, the database is updated to reflect completion.

### C. Investigation

When the FM or EPM determines that a violation will require an enforcement response, the FM or EPM will investigate and determine the appropriate enforcement action. Investigation for the enforcement action involves:

- Clearly defining the Pretreatment Ordinance, or permit condition that the IU violated.
- Verifying that an enforcement action is factually defensible by reviewing supporting documentation including but not limited to:
  - Industrial User self-monitoring reports,
  - POTW monitoring results
  - Wastewater discharge permits
  - Discharge authorization letters

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

- Correspondence with the IU (mail or e-mail)
- Inspection reports
- Operator records (if plant process was upset)
- Spill reports

The investigation will determine which of the following situations apply to the violation.

- A failure to comply with regulations regarding monitoring, reporting, compliance schedule milestones, maintenance, pretreatment requirements, or records maintenance.
- A non-emergency situation requiring timely corrective action by the discharger.
- An emergency situation involving a threat to life or health or threatening an upset of plant process resulting in permit violations.
- A willful or negligent violation of discharge regulations including filing false reports, denying access to premises or records, discharging through unauthorized connections, tampering with sampling, or metering devices, deliberately circumventing pretreatment facilities, or continuing a prohibited discharge in violation of an order to cease.

The enforcement response plan will then be reviewed and the type of non-compliance defined. The enforcement response tables in section 5.4 will be consulted to determine the appropriate enforcement response. A draft enforcement response and supporting documentation will be submitted to the partner jurisdiction for review and approval.

### 5.3 ENFORCEMENT RESPONSE

#### A. Introduction

All enforcement responses require the coordinated participation of the FM EPM or ES and the local Director. The FM EPM or ES is responsible for fully documenting violations, conducting investigations, providing reports, and developing the appropriate enforcement response.

Each Partner has legal authority under state law to require compliance with its ordinance. The local Director is responsible for providing the resources to issue and follow through with an enforcement action.

Enforcement responses up to and including Notices of Violation are reviewed and approved by the partner contact. The partner contact must review any enforcement response above the level of Correction Notice. The local Director must review any enforcement response above the level of Notice of Violation and work with the FM EPM or ES to make any modifications necessary to meet local jurisdiction needs. The local Director, or partner contact is responsible for following up on the enforcement action, including obtaining needed attorney assistance, issuing orders, and ensuring that penalties are collected.

#### B. Education and Outreach (E&O)

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

Absent situations requiring a more urgent response, Education and Outreach is the first response, prior to formal enforcement. Because IUs may be subject to varying degrees of oversight, the initial response in the case of most IUs is for LOTT to clearly describe to the IU what their obligations are with regard to discharges to the POTW. Education and Outreach is appropriate for non-permitted IUs when the violation is minor and no harm has occurred to the POTW, its workers, or the environment.

The obligations for permitted IUs are detailed in their discharge permits therefore the Level One response of a verbal warning is appropriate for permitted IUs when the violation is minor and no harm has occurred to the POTW, its workers, or the environment.

### 1. Responses

#### a. Correction Notice: LOTT ES or EPM

This is a written notice to an IU that a minor deficiency, such as a failure to maintain a grease interceptor, needs to be corrected. The notice will require the deficiency to be corrected within a specified time frame. Correction Notices are issued during inspections by the ES or EPM. Typical deficiencies where a Correction Notice is issued include relatively minor maintenance requirements such as:

- The need to routinely maintain a pretreatment device.
- Provide access to an inaccessible pretreatment device.
- Other items that typically can be corrected within a short time (thirty days) and do not require the IU to coordinate with multiple service providers or obtain building/plumbing permits.

#### b. Inspection follow-up letters: ES or EPM

Inspection follow up letters memorialize conversations, observations and data and notify the IU of the presence or lack of deficiencies. Follow-up letters that specify requirements beyond those identified in Section 5.3 B(1)(a) are reviewed and approved by the partner contact prior to being sent. Follow up letters may be sent via standard mail or e-mail.

If an inspection reveals deficiencies that require correction, they will be detailed along with a deadline for completion in the follow-up letter. If a Correction Notice was issued onsite, the follow-up letter will re-iterate the requirement(s), and timeline(s) specified in the Correction Notice. If the deficiencies noted in a Correction Notice have been corrected prior to the follow-up

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

letter being mailed, then the follow-up letter will notify the IU that the deficiency has been corrected.

Deficiencies beyond the scope of a Correction Notice will be addressed in a follow-up letter. These deficiencies are either related to a wastewater discharge permit, require corrections with greater complexity e.g. (the need to contact multiple service providers), or require a time frame greater than thirty days to complete. Examples of deficiencies too complex for a Correction Notice that may be specified in a follow-up letter include, but are not limited to:

- Update of a Slug Discharge Control Plan
- Submittal of an Operation Manual for a pretreatment device
- Installation of baffles, or pipes inside a grease interceptor
- Grease interceptor repair or re-routing of fixtures connected to (or not connected to) a grease interceptor.
- Cleaning a sewer lateral.
- Installation of a flow control device

### C. Levels of Enforcement

The range of enforcement responses may be categorized in three levels of escalating enforcement depending on the nature and circumstances of the violation.

#### 1. Level 1. Warning

##### a. Purpose

The purpose of warning responses is to obtain compliance in violations that have not resulted in significant non-compliance (SNC), are not part of a pattern of non-compliance, and do not present immediate risk to the treatment process, workers, or the environment.

##### b. Responses

#### 1. Verbal warning: LOTT EPM or ES

After consulting with the partner contact (when feasible) the LOTT EPM or ES will provide verbal warning of a violation either by telephone or in person. This notification will be documented by an entry into the IU's file. This entry will cite the permit or ordinance section that was violated, the date and time of the notification, the person notified, and the response of the person notified.

#### 2. Letter of Violation: LOTT EPM or ES

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The EPM or ES will prepare a letter of violation (LOV) addressed to the chief executive officer or duly authorized signatory for the IU. The LOV is reviewed and approved by the partner contact prior to mailing. The LOV will describe the violation, cite the Pretreatment Ordinance and/or Discharge Permit sections pertaining to the violation, and require a written response within 7 days detailing satisfactory corrective action.

If the violation was a reporting requirement (including failure to complete an IU Survey) then the LOV will not require a corrective action. Instead, the IU will be required to submit the report within 7 days.

The LOTT EPM or ES will sign the LOV. LOVs will not include compliance schedules, administrative orders, or other enforcement actions requiring the authority of the local Director.

### 2. Level 2. Administrative Enforcement Remedies

#### a. Purpose

These responses serve to correct non-compliance, to enact penalties, and conduct public notification required for cases of SNC. Level 2 responses will always be taken in cases of SNC, as defined in the Pretreatment Ordinance. However, it is not limited to these cases. Level 2 responses may follow Level 1 responses or be taken initially. A combination of these responses may be used at one time. Level 2 responses will be signed by the local Director (except for NOV's which may be signed by the partner contact), issued on City letterhead, and addressed to the Chief Administrative Officer, or duly authorized signatory, for the IU.

#### b. Legal Authority

The Pretreatment Ordinance provides for remedies for non-compliance including civil, and/or criminal penalties or fines, notices of violation, consent orders, compliance orders, cease and desist orders, show cause orders/hearings, recovery of costs, and suspension or revocation of sewer service. Each Partner has authority under State law to issue such enforcement measures to comply with the Pretreatment Ordinance and to seek injunctive relief for non-compliance. These remedies may be sought in a combination of administrative and/or judicial action.

#### c. Responses

1. Notice of Violation: FM or EPM and the local Director or partner contact

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The FM or EPM will prepare a Notice of Violation (NOV) describing the violation and citing the sections of the Pretreatment Ordinance and/or discharge permit that have been violated. The NOV will include a description of the remedies (injunction, fines, civil penalties, interruption of service) that may be sought by the Partner to ensure that the IU returns to compliance. The NOV will be signed by the local Director, or partner contact. An NOV may be issued prior to, or concurrent with, other Level 2 responses.

An NOV will require a written response from the IU with an explanation of the violation, its cause, and a corrective action plan. The written response is due within seven (7) days of receiving the NOV.

### 2. Compliance Order: FM or EPM and the local Director.

A Compliance Order (CO) may be issued to an IU when:

- The NOV did not result in the IU coming into compliance,
- Noncompliance cannot be resolved without construction, repair, or process changes,
- A condition has recurred and an NOV is merited concurrent with an AO, or
- Immediate and specific action is necessary.

A Compliance Order states conditions that must be met by the IU to correct non-compliance. The CO will state the conditions to be met, the timelines required, and the enforcement responses that may follow if non-compliance is not corrected. COs may include, but are not limited to:

- A schedule for completion of milestones towards compliance. After determining that the proposed schedule is adequate, the FM or EPM will prepare a CO requiring completion of the milestones within the specified timelines.
- Requirement to submit an Engineering Report meeting requirements of WAC 173-240-130 and/or an Operations and Maintenance manual for pretreatment facilities and/or equipment required to correct non-compliance.

All COs will be addressed to the Chief Executive Officer, or duly authorized signatory, for the IU. All COs will be on City Letterhead and will be signed by the local Director. A CO will cite the subsequent enforcement responses and penalties that can be enacted for a violation of the order.

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3. Consent Order: FM or EPM and the local Director.

A Consent Order may be issued under the same circumstances as a Compliance Order, utilizing the same procedures. The difference between a Consent Order and a Compliance Order is that a Consent Order is a negotiated agreement between the IU, the FM or EPM and the Partner. A Consent Order is appropriate when the IU acknowledges responsibility for its noncompliance and is willing (in good faith) to correct its cause(s).

4. Cease and Desist Order: FM or EPM and the local Director.

A Cease and Desist Order may be issued when the IU has violated, or continues to violate, any provision of the Pretreatment Ordinance, a wastewater discharge permit or order issued hereunder, or any other pretreatment standard or requirement, or that the User's past violations are likely to recur. The FM or EPM will draft a Cease and Desist Order to be issued by the local Director.

The Order will direct the IU to cease and desist immediately or by a certain time all such violations, immediately comply with all requirements, and take appropriate remedial or preventive action as needed to properly address a continuing or threatened violation, including halting operations and/or terminating the discharge.

5. Emergency Suspension: FM or EPM and the local Director.

An Emergency Suspension may be used when a User's discharge (or threatened discharge) reasonably appears to present a substantial danger to the health or welfare of persons, threatens to interfere with the operation of the POTW, or presents, or may present, a danger to the environment (collectively a "substantial endangerment").

When a discharge or threatened discharge reasonably appears to present a substantial endangerment, the local Director will first provide informal verbal or written notice to the IU and seek a response from the IU. While the opportunity to respond is provided, a hearing prior to any emergency suspension is not required.

Any IU notified of a suspension of its discharge must immediately stop or eliminate its contribution. If an IU fails to immediately comply with the suspension order, the local Director may take such steps as deemed necessary to protect the public and its interest in the sewer system

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

including but not limited to immediately severing the sewer connection.

When an emergency suspension is merited the FM or EMP will notify the IU of LOTT's intent to request an emergency suspension from the local Director. After consulting with the FM or EMP the local Director will contact the IU in person, or by telephone and request that the IU voluntarily cease their discharge. If the IU does not voluntarily comply then the Partner may immediately sever the sewer connection.

### 6. Show Cause Hearing and Appeal Hearings: LOTT FM or EPM and the local Director

The Pretreatment Ordinance provides for Show Cause and Appeal Hearings at which the IU may provide evidence why a proposed enforcement action should not be taken, and to provide its support for any alternative. The difference between the two hearings is Show Cause Hearings are initiated by LOTT or the Partner jurisdiction, and Appeal Hearings are initiated by the IU.

A Show Cause Hearing may be offered in writing by the local Director. The written offer will notify the IU of the violation, and the proposed enforcement response to the violation. It will also include a date, time and location for the hearing.

An Appeal Hearing must be requested by the IU in writing within fifteen (15) business days after the IU receives notice of the Partner's action. The IU's written request for hearing must be filed with the LOTT Executive Director.

Once offered or requested, the FM or EPM will arrange for a Show Cause or Appeal Hearing conforming to the conditions of the Pretreatment Ordinance. Hearings will be held before the LOTT Technical Sub Committee (TSC). Formal rules of evidence do not apply. However, the IU and the Partner have the right to present witnesses and other evidence. The TSC will issue a written decision within fourteen (14) business days of the conclusion of the hearing.

A request for an Appeal Hearing is not a good faith effort to achieve compliance, does not delay any compliance schedules and will not be considered mitigating unless the IU demonstrates sufficient cause as to why an enforcement action should not proceed at the hearing, but then only with respect to the enforcement actions on which the IU demonstrates sufficient cause.

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7. Administrative Civil Fines: FM or EPM, local Director, and Partner Attorney

Under the Pretreatment Ordinance, violators may be assessed Administrative Civil Fines of up to \$10,000 per day per violation. Fines must be large enough to act as an incentive for the IU to return to and remain in compliance.

The fine must also be large enough to remove any financial incentive for the IU to remain in non-compliance and exceed the financial benefit that the IU gained during the period of non-compliance. In the event of a violation causing damage and/or increasing treatment costs to the POTW, or a significant, recurring, and long-standing series of violations benefiting the IU, the FM or EPM and local Director will determine the amount of a fine likely to cause the IU to return to compliance.

Fines may also be assessed to recover the costs of emergency response, additional monitoring, investigation, and administrative costs related to the noncompliance, including attorney's fees and costs, and the [City or County]'s response to the situation.

The local Director or Partner Attorney will begin action to impose and collect the civil penalty in the determined amount for each day of non-compliance.

8. Annual Publication of Significant Non-Compliance: LOTT FM or EPM

The Pretreatment Ordinance, and Federal pretreatment regulations, require annual publication of IUs in SNC. The FM or EPM will prepare a list of IUs in SNC, including a brief description of the non-compliance. This list will be published in the newspaper of largest circulation in the County. The local Directors will receive a copy of the publication list.

3. Level 3. Final Sanctions

- a. Purpose

Level 3 responses represent the final action taken in cases of severe non-compliance. These cases involve recurring non-compliance without good faith efforts to comply, discharges that threaten to cause immediate harm to the POTW, workers health, or to the environment, and criminal wrongdoing including falsification of records. These responses require active participation of legal staff. The object of these actions is to positively secure compliance, through termination of the discharge if necessary.

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### b. Responses

1. Injunctions: FM or EPM, local Director, and Partner Attorney

The FM or EPM will provide all necessary information and documentation to the local Director and the Partner Attorney. The Attorney will promptly undertake judicial action to secure an injunction against the IU. The injunction may require a return to compliance or may enjoin the IU from discharging to the sewer. An injunction may accompany termination of sewer services.

2. Suspension of Sewer Services and/or Discharge Permit: FM or EPM, local Director, and Executive Director

The FM or EPM will provide supporting information leading to the decision to suspend sewer service and/or discharge permit. This will include information on the nature of the discharge and the potential for harm if the discharge is not suspended. The local Director may take action to block the sewer or shut off water if merited to accomplish suspension of service. Sewer service and discharge permits will not be re-instated until full compliance is established and all penalties and costs due are paid.

3. Termination of sewer service and/or Discharge Permit: FM or EPM, Executive Director, local Director, and Partner Attorney

This action is to be taken when the IU has indicated an unwillingness or inability to come into compliance. The Pretreatment Program and the Partner must be in agreement on this procedure and secure legal advice. The local Director will notify the affected IU that sewer service is to be terminated, and any discharge permit revoked.

4. Criminal Penalties: Partner Attorney, and Local Police Department

This action will be used when other applicable enforcement actions have failed or when there has been an effort to conceal non-compliance. The Partner Attorney or Police Department will file a complaint with the appropriate prosecutor leading to the filing of a criminal complaint against the IU. When appropriate, the Department of Ecology or USEPA may be contacted regarding criminal investigations.

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### 5.4 ENFORCEMENT RESPONSE GUIDELINES

All IU non-compliance will be met with some response from the FM or EPM and/or the local jurisdiction. The following table lists violations likely to be encountered and the range of enforcement responses. The individuals responsible for each type of response have been indicated in the previous section describing the escalating levels of enforcement response. This is not a complete list of all possible instances of non-compliance. In the event of non-compliance not listed in this table, the FM EPM or ES will develop an appropriate enforcement response, using the *EPA Guidance for Developing Control Enforcement Response Plans* manual and input from the local jurisdiction.

#### A. Enforcement Response Table

<b>NON-COMPLIANCE</b>	<b>ACTION</b>
<b>UNAUTHORIZED DISCHARGE - NO PERMIT</b>	
IU unaware of requirement, no harm*	Level 1
IU unaware of requirement, harm	Level 2 with administrative civil fine
IU failed to renew permit within 10 days of expiration	Level 1
<b>UNAUTHORIZED DISCHARGE TO GROUND OR STORMWATER</b>	
IU unaware of requirement, no harm	Level 1
IU unaware of requirement, harm	Level 2 with administrative civil fine
<b>VIOLATION OF DISCHARGE LIMITATIONS</b>	
Isolated, not significant	Level 1
Isolated, SNC, no harm	Level 2
Isolated, harm	Level 2 with administrative civil fine
Recurring, SNC, no harm	Level 2 with administrative civil fine
Recurring, SNC, harm	Level 2 with administrative civil fine
<b>MONITORING AND REPORTING VIOLATIONS</b>	
Failure to submit report/IU Survey	E&O Contact business and notify them of their obligation to submit report/IU Survey.
Failure to submit report/IU Survey after notification	Level 1
Failure to submit report/IU Survey after Level 1 response	Level 2, or assess late report penalties
Failure to update slug discharge control plan after notification	Level 1
Report improperly signed/certified	E&O Contact business and require them to resubmit the report with correct a correct signature/certification
Report improperly signed/certified after notification	Level 2
Isolated, not significant (5 days late, etc.)	Level 1
Significant, (more than 30 days late)	Level 2
Recurring late or missing reports	Level 2 with fine
Failure to report spill or change, no harm	Level 1
Failure to report spill or change, harm	Level 2 with fine and civil penalty
Intentional false reporting	Level 3

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<b>NON-COMPLIANCE</b>	<b>ACTION</b>
Isolated failure to monitor as required	Level 1
Recurring failure to monitor	Level 2
Tampering with samples/monitoring equipment	Level 3
Failure to install monitoring equipment	Level 1
Failure to install monitoring equipment, delay of more than 30 days	Level 2
Missed compliance schedule date, less than 30 days, will not affect final compliance date	Level 1
Missed compliance schedule date, more than 30 days or will affect final date, good reason for delay	Level 1 or Level 2
Recurring violation of compliance schedule or violation of schedule in AO	Level 2 with fine or civil penalty
<b>VIOLATIONS DETECTED BY INSPECTION</b>	
Failure to maintain a pretreatment device	E&O, Issue Correction Notice requiring maintenance. Educate business with LOTT BMPS.
Denial of entry, criminal activity suspected	Level 3, obtain warrant
Denial of entry, after DSA Notified	Level 2 Notice of Violation
Denial of entry, after failure to respond to NOV	Level 3, file court injunction mandating entry
Illegal discharge with no harm	Level 2
Illegal discharge with harm	Level 2 with fine and civil penalty
Recurring illegal discharge	Level 3
Incorrect sampling technique, location, unintentional	Level 1
Inadequate record keeping, no attempt to conceal	E&O: Notify business of its obligation to maintain records.
Recurring failure to maintain records	Level 1
Failure to report additional monitoring	Level 1
Recurring failure to report additional monitoring	Level 2
Failure to post notifications required by slug discharge control plan	Level 1
<b>VIOLATIONS REPORTED BY IU</b>	
IU reports isolated violation, no harm	Level 1
IU reports isolated violation, harm	Level 2
IU reports spill/slug discharge, no harm	Level 1
IU reports spill/slug discharge, harm	Level 2 with fine or civil penalty
IU reports bypass, harm	Level 2 with fine or civil penalty
<b>FAILURE TO MEET A COMPLIANCE MILESTONE</b>	
Failure to respond to requirement(s) of Correction Notice or Follow up Letter	Level 1 Letter of Violation
Failure to respond to Letter of Violation	Level 2 Notice of Violation
Failure to respond to Notice of Violation	Level 2 Compliance Order

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NON-COMPLIANCE	ACTION
Failure to meet terms of a Compliance Order (without requesting extension)	Level 2 Administrative Civil Fine
Recurring failure to meet terms of a Compliance Order (without requesting extension)	Level 3 Discontinue Sewer Service
*Harm is defined as an occurrence that causes pass-through, interference, health hazard, environmental hazard, or significant effect as determined by FM OR EPM, which results in a bypass, or causes the POTW to exercise its emergency authority.	

### B. Food Service Establishment Enforcement Response Table

NON-COMPLIANCE	FACTORS	ACTION
Failure to maintain grease interceptor.	Violation detected during routine inspection. No observed grease discharges in POTW.	E&O, Issue Correction Notice requiring pump-out. Educate business with LOTT BMPS. Require business to maintain grease interceptor according to ordinance or approved variance.
	Violation detected during inspection conducted in response to Partner referral that did not result in a sewer back up, lateral back-up, or reportable spill.	E&O, Issue Correction Notice requiring pump-out. Educate business with LOTT BMPS. Require business to maintain grease interceptor according to ordinance or approved variance. Sewer lateral cleaning may be required.
	Violation detected during inspection in response to Partner referral that resulted in a sewer back up, lateral back-up, or reportable spill.	Level 1, and sewer lateral cleaning may be required. Require business to maintain grease interceptor according to ordinance or approved variance.
	Recurring lack of maintenance that did not result in a sewer back up, lateral back-up, or reportable spill.	Level 1, and sewer lateral cleaning may be required.
Grease Interceptor overflow/ evidence of overflow.	Violation detected during routine inspection.	E&O, Issue Correction Notice requiring pump-out, or other correction. Educate business with LOTT BMPS. Sewer lateral cleaning may be required depending on site conditions.

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NON-COMPLIANCE	FACTORS	ACTION
		Provide courtesy notification to Thurston County Environmental Health.
	Violation detected during inspection conducted in response to Partner referral that did not result in a sewer back up, lateral back-up, or reportable spill.	E&O, Issue Correction Notice requiring pump-out, or other correction. Educate business with LOTT BMPS. Require sewer lateral cleaning.
	Violation detected during inspection conducted in response to Partner referral that resulted in a sewer back up, lateral back-up, or reportable spill.	Level 1, and require sewer lateral cleaning. Educate business with LOTT BMPS.
	Recurring violation that did not result in a sewer back up, lateral back-up, or reportable spill.	Level 2, and sewer lateral cleaning may be required.
	Recurring violation that resulted in a sewer back up, lateral back-up, or reportable spill.	Level 2 with fine or civil penalty.
Grease producing fixture not connected to grease interceptor.	Deficiency detected during routine inspection.	E&O, notify business that a grease interceptor, or connection of fixture to existing grease interceptor may be required if grease accumulations are noted in the sewer, if current use expands, or if work which would require a plumbing permit is performed.
	Deficiency detected during inspection conducted in response to Partner referral that did not result in a sewer back up, lateral back-up, or reportable spill.	E&O, require business to clean lateral. Notify business that a grease interceptor may be required if grease accumulations are noted in the sewer, if current use expands, or if work which would require a plumbing permit is performed.
	Deficiency detected during inspection conducted in response to Partner referral that resulted in a sewer back up, lateral back-up, or reportable spill.	Level 1 and require business to connect fixture to an appropriately sized grease interceptor or install an appropriately sized grease interceptor. Require sewer lateral cleaning.

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NON-COMPLIANCE	FACTORS	ACTION
Grease interceptor not watertight due to corrosion.	Minor corrosion (minor is defined as needing repairs that would not significantly reduce the functioning volume of the grease interceptor).	E&O, Require repair.
	Major corrosion (major is defined as needing repairs that would significantly reduce the functioning volume of the grease interceptor)	Level 1, require business to replace grease interceptor.
Garbage grinder connected to Hydromechanical Grease Interceptor (HGI)	N/A	E&O, require garbage grinder to be permanently removed.
Garbage grinder discharging directly to sewer.	N/A	E&O, require garbage grinder to be permanently removed or connected to gravity grease interceptor if one is already installed.
Dishwasher connected to HGI.	Dishwasher connected to HGI after Feb 2025 or connected to HGI before Feb 2025 and malfunction of HGI or bypass of grease is noted.	Require business to reroute the dishwasher so it bypasses the grease interceptor.
HGI missing inlet or outlet baffle.	N/A	E&O, require business to install inlet or outlet baffle.
HGI installed backwards.	Deficiency detected during routine inspection.	Notify business that re-installation may be required if grease accumulations are noted in the sewer, or if a plumbing permit is obtained. Educate business with LOTT BMPs.
	Deficiency detected during inspection conducted in response to Partner referral that did not result in a sewer back up, lateral back-up, or reportable spill.	If it is determined that the backwards installation is allowing grease to discharge to the sewer, require business to clean sewer lateral. Notify business that a re-installation may be required if grease accumulations are noted in the sewer, or if work which would require a plumbing permit is performed.
	Deficiency detected during inspection conducted in response to a Partner referral that resulted in a sewer back up, lateral	Level 1 and require business to re-install grease interceptor. Require sewer lateral cleaning.

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NON-COMPLIANCE	FACTORS	ACTION
	back-up, or reportable spill.	
HGI missing flow restrictor	Deficiency detected during routine inspection.	E&O, require business to install flow restrictor. Cleaning of sewer lateral cleaning may be required depending on site conditions.
	Deficiency detected during inspection conducted in response to Partner referral that did not result in a sewer back up, lateral back-up, or reportable spill.	
	Deficiency detected during inspection conducted in response to Partner referral that resulted in a sewer back up, lateral back-up, or reportable spill.	
Gravity Grease Interceptor missing pipes such as inlet/outlet tee or drop legs	Routine inspection	E&O: Require installation of pipes no later than 90 days, or during the next scheduled pump-out, whichever is sooner.
	Inspection conducted in response to Partner referral.	Level 1, require installation of pipes no later than 30 days. Require sewer lateral cleaning.
Grease producing fixtures bypassed grease interceptor	Routine inspection	Level 1, require fixtures to be reconnected to grease interceptor.
	Inspection conducted in response to Partner referral.	Level 1, require that fixtures be reconnected to grease interceptor. Require sewer lateral cleaning.
Grease interceptor altered	Routine inspection	Level 1, require that alteration be repaired to original specification. If that is not feasible, require replacement of grease interceptor.
	Inspection conducted in response to Partner referral.	Level 1, require that alteration be repaired to original specification. If that is not feasible, require replacement of grease interceptor. Require sewer lateral cleaning.
Grease interceptor is not accessible.	N/A	E&O: Require impediment to accessibility to be removed or require grease interceptor to be relocated.
Enzymes or similar additives are being added to a grease interceptor.	N/A	E/O: require business to stop adding enzymes to grease interceptor.

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<b>NON-COMPLIANCE</b>	<b>FACTORS</b>	<b>ACTION</b>
Failure to maintain records	N/A	E&O: Notify business of its obligation to maintain records.
Incomplete pump out	N/A	E&O: Educate business of proper pump out requirements
Recurring incomplete pump out	N/A	Level 1

### C. Hauled Waste Enforcement Response Table

<b>NON-COMPLIANCE</b>	<b>RESPONSE</b>
<b><u>ILLICIT/PROHIBITED DISCHARGES</u></b>	
Discharge of waste originating from outside the boundaries of Thurston County	Level 1
Discharge of waste from septic systems receiving industrial or commercial wastewater	Level 1
Discharge of residue from a pretreatment device	Level 2 with fine or civil penalty
Discharge of hazardous waste	Level 2 with fine or civil penalty
Discharge of hauled waste to the POTW at a point not designated by the Executive Director	Level 2
<b><u>FACILITY USE</u></b>	
Failure to clean a spill	Level 1
Washing vehicles at the Hauled Waste Receiving Station	Level 1
Entering the site behind an exiting vehicle without using the proximity card	Level 1
Creating a safety hazard at the Hauled Waste Receiving Station	Level 1
Failure to collect a self-monitoring sample	Level 1
Recurring violations	Level 2 with fine or civil penalty
<b><u>REPORTING VIOLATIONS</u></b>	
Failure to submit report	E&O: Contact business and notify them of their obligation to submit report
Failure to submit report/IU Survey after notification	Level 1
Failure to submit report/IU Survey after Level 1 response	Level 2
Report improperly signed/certified	Level 1
Report improperly signed/certified after notification	Level 2

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

### D. Discharge Authorization Letter Enforcement Table

<b>NON-COMPLIANCE</b>	<b>ACTION</b>
Discharge at non-approved discharge point	Level 1
Bypass of treatment system	Level 2 with fine or civil penalty
Discharge of sediment	Level 1
Discharge of flows greater than limits specified in written authorization	Level 1
Removal of flow meter	Level 2 with fine and civil penalty
Failure to submit reports	E&O: Contact business and notify them of their obligation to submit report
Recurring failure to submit reports	Level 1
Failure to submit additional monitoring	E&O: Contact business and notify them of their obligation to submit report

### E. Enforcement Response Timeframes

- All violations will be documented within five days of receiving compliance information.
- Initial enforcement responses involving contact with the IU and requesting information on corrective action will occur within 15 days of detection of the violation.
- Follow up actions for recurring violations will be taken within 60 days of the initial enforcement response. The FM or EPM will evaluate the violation and develop a compliance schedule if necessary.
- Violations threatening health or the environment or damage to property will receive immediate responses including halting the discharge or interrupting service.

### F. Factors for Determining Monetary Penalties for Non-Compliance

Monetary penalties may be considered at any non-compliance level as indicated in the previous Enforcement Response Guidelines. Monetary penalties are also to be considered in all cases of SNC in order to ensure a return to compliance. In addition to fines and/or civil penalties, the LOTT Partners may recover costs for direct expenses and damages to POTW facilities. The Executive Director and the local Director, in association with the local jurisdiction attorney, will be responsible for establishing the amount and conditions of all administrative fines and civil penalties. The Partner, in agreement with the Executive Director, may suspend some portion of a fine or civil penalty based upon the good faith and compliance history of the IU. The following factors will be considered in assessing fines and penalties:

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

### 1. Magnitude:

This factor considers the type and quantity of pollutants discharged in non-compliance.

For a violation of daily maximum standards, the EPA guidance provides that the volume discharged from the date the noncompliant sample was taken, until the date that a new sample shows a return to compliance, will be considered the total volume. For violations of categorical monthly average limits, where daily limits have not been exceeded, the volume discharged during the entire month for which the sample(s) was (were) taken, extending until the monthly average returned to compliance, will be considered total volume discharged in non-compliance.

Where discharge flows are not directly measured, the pretreatment program may use water consumption records and/or production records to estimate discharge volumes. The volume discharged per day will generally be determined by subtracting the number of gallons of water used in the product and for sanitary purposes (assume 20 gallons per day per employee) from the total water consumed.

In addition to flow, the loading of the pollutant of concern should be determined where concentration measurements and standards provide the necessary information. This pollutant concentration, relative to the discharge limitation concentration or other level of concern will be determined and multiplied by the discharge volume to determine the magnitude factor,  $F_M$ , for purposes of assessing penalties.

$$F_M = \frac{\text{Pollutant concentration mg/l} \times \text{Discharge volume in gallons}}{\text{Discharge limitation mg/l}}$$

### 2. Impact or Threat:

This factor considers the threat or harm done to the environment, the public, the POTW or POTW workers from the pollutants discharged. For purposes of assessing fines and penalties, the following impact ranges will be considered:

- a. Violation of Pretreatment Standard or requirement without causing interference, pass through, or direct harm or danger to the environment, the public or workers, receives a \$100 minimum penalty.
- b. Violation causing interference or pass through, or damaging the POTW or causing the POTW or any Partner to be in violation of any local, state or federal standard or requirement receives a \$500 minimum penalty.
- c. Violation creating the potential, whether harm actually occurs or not, to cause immediate harm to the public, workers or the environment receives a \$1,000 minimum penalty.

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

### 3. Culpability:

This factor considers whether the noncompliance was on purpose, negligent, or unforeseeable. It is determined through investigation or inferred from the IU's compliance history. For purposes of establishing fines, the following levels of culpability will be considered:

- a. For the first instance of SNC, for negligent or unforeseeable continued non-compliance, accompanied by good faith efforts to correct non-compliance, or for evidence that all pretreatment requirements other than discharge standards have been met, the IU will not receive an increased culpability factor and the penalty will be multiplied by a culpability factor,  $F_C$ , of 1.
- b. For an IU with a history of repeated non-compliance, or continued non-compliance without efforts to correct non-compliance, the penalty will be multiplied by a culpability factor,  $F_C$ , of 2.
- c. For intentional or known activity producing or prolonging non-compliance and/or concealing non-compliance, the penalty will be multiplied by a culpability factor,  $F_C$ , of 3. This type of activity may include, but is not limited to, the following:
  - Intentional dilution of waste streams to reduce concentrations of pollutants and avoid treatment.
  - Inadequate facilities for prevention, control or treatment of pollutant discharges.
  - Removing, incapacitating, bypassing or defeating equipment previously installed for prevention, control or treatment of pollutant discharges.
  - Denying access to Pretreatment Personnel for purposes of a site inspection, including for the purpose of observing, sampling and verification of conditions at industrial facilities.
  - Delay in taking action to correct non-compliance.
  - Failure to obtain business licenses, construction permits, discharge permits and other necessary regulatory documents.
  - Attempts to conceal activity.

### 4. Savings to Industry:

This factor considers the monetary benefit the IU may have achieved from any noncompliance, both from saving or avoiding disposal costs that would otherwise have been incurred, and from not installing, monitoring and maintaining appropriate technology to prevent the discharge or

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

properly pretreat the wastewater. Determining the savings an IU gained through non-compliance requires an examination of the nature of the non-compliance and the source(s) of the savings. Some examples follow:

- In cases of non-compliance with pretreatment requirements, such as failure to submit engineering plans or monitoring reports, the pretreatment program may obtain estimates of the cost of having such reports prepared by a consulting firm.
- In cases where the industry failed to provide, monitor or maintain pretreatment equipment, the pretreatment program may obtain estimates of the cost of the same and calculate the savings in capital expense, operating costs and debt service.
- An alternative in cases where the IU failed to provide pretreatment equipment is to estimate the costs that would have been incurred had a treatment storage and disposal facility (TSD) handled the waste. The Department of Ecology suggests using the equivalent volume of the discharges one order of magnitude above the Dangerous Waste (DW) threshold (as found in WAC 173-303-090(8)). The savings, S, in this case would be determined as:

$$S = \frac{(\text{total gal discharged}) \times (\text{avg discharge conc. in mg/l}) \times (\$/\text{gal at TSD})}{(10 \times \text{DW threshold in mg/l})}$$

Where no specific limits are listed for a pollutant, this approach may use criteria limits for carcinogens or limits established by toxicity characterization of unlisted pollutants.

Savings to an IU may also occur from failure to meet pretreatment requirements such as preparing engineering reports or conducting sampling and analysis. The FM or EPM may obtain estimates based on prevailing costs of such services in order to establish cost savings for purposes of assessing penalties.

### 5. Direct Expenses to the POTW and Partners:

Costs of direct expenses may be assessed apart from any fines or civil or criminal penalties. Direct expenses may include, but are not limited to, the following:

- Additional sampling and investigation expenses,
- Costs of completing an investigation report as described in LOTT's enforcement response plan,
- Labor and administrative costs for the POTW and Partner to process the penalty,

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

- Recovery of cost of fines for POTW noncompliance caused by the discharge,
- Additional treatment or disposal costs attributable to the discharge.
- Costs of legal assistance to process the enforcement action and/or defend the Partner(s) against actions brought by parties harmed by the non-compliance.

### 6. Cost of Damages:

This factor considers the cost of damage to the POTW or the collection system. Damages may be assessed in addition to any fines, civil or criminal penalties applied for non-compliance. Estimates of damages to the treatment works include damage expected to decrease the useful life of any portion of the collection system, such as from discharges of corrosive wastewater. Damage costs may also include the costs of increased maintenance. Other damage costs may include:

- Time and materials for work performed by Partner employees, agents, and contractors.
- Equipment, manpower, material, and repairs supplied by contractors. This may be actual costs or engineering cost estimates made concerning the damage.
- Attorneys' fees and costs, settlements or awards made to damaged parties or assessed against LOTT or any or all the Partners. This includes insurance or self-insurance claims for injuries or damages.

### G. Calculations for Monetary Penalties for Non-Compliance

#### 1. Violation of Pretreatment Standards

These violations of standards include discharge of pollutants in excess of permit limits, discharge of pollutants not specifically authorized by the permit, or discharge of pollutants exceeding local limits for pollutants regulated by local ordinance.

- a. Penalty for non-compliance with discharge limitations and/or prohibitions:

The penalty for violation of discharge limitations contained in the Pretreatment Ordinance, a discharge permit, administrative order or other regulatory device, where the discharge did not cause pass through or interference and the culpability of the discharger is not severe:

$$P = \$0.04 \times F_M \times F_C + \text{Cost Savings} \\ \text{or } \$100.00, \text{ whichever is greater.}$$

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

- b. Penalty for non-compliance resulting in pass through or interference

Non-compliance causing pass-through or interference usually results in significant cost, inconvenience, and reduction in efficiency in treatment processes, which may result in environmental damage and/or risk to worker or public health. Due to the risk and potential cost to LOTT, these penalties must be severe enough to motivate violators to return to compliance immediately. In addition to any penalties for such violations, the Partner will recover any direct costs incurred and assess charges for any damage to the POTW. The penalty for non-compliance resulting in pass-through or interference will be calculated by:

$$P = \$0.20 \times F_M \times F_C + \text{Cost Savings}$$

or \$500 per day of violation, whichever is greater.

- c. Penalty for non-compliance causing imminent danger to the public, imminent danger to the environment, or causing any Partner to invoke its emergency authority:

Danger to the health and safety of workers and/or the public may be indicated by discharge of pollutants in quantities that could exceed acute health and safety levels. This includes discharges with concentrations of ignitable pollutants at or in excess of lower explosive level (LEL) concentrations, or concentrations of toxic pollutants at or in excess of National Institute of Occupational Safety and Health (NIOSH) Immediately Dangerous to Life or Health (IDLH) thresholds.

Costs of damages to the POTW resulting in this type of non-compliance may be assessed by the POTW or Partners for any or all of the following:

- Costs incurred addressing environmental damages,
- Costs of fines or penalties imposed on LOTT, any Partners or individuals, and
- Costs of administrative efforts to end non-compliance will be assessed in addition to any penalties.

The penalty for these non-compliances will be:

$$P = \$1.00 \times F_M \times F_C + \text{Cost Savings}$$

or \$1,000 per day of violation, whichever is greater

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

### 2. Violation of Pretreatment Requirements

Penalties for violations of Pretreatment Requirements will be imposed in addition to all other fines, civil and/or criminal penalties, and reimbursement assessed for the violation. Violations of pretreatment requirements may include:

- a. Penalty for failure to meet compliance schedule milestones and/or terms of enforcement orders

Compliance schedules and enforcement orders may be associated with previous non-compliance. The FM or EPM and local Director will review the compliance history of the industry in violation when establishing the penalty for non-compliance. The FM or EPM will determine the cost savings realized by the IU as a result of the non-compliance and add this to the penalty.

This penalty will be multiplied by a factor of 2 when the FM or EPM and local Director determine that the non-compliance is recurrent and/or part of a pattern of non-compliance with schedules and/or orders.

The basic penalty will be calculated by:

$$P = (\$100 (\text{Days overdue})/7) + \text{Savings to IU}$$

- b. Penalty for failure to provide required reports within the specified reporting period:

For reports more than 30 days overdue, and not indicating non-compliance with applicable pretreatment standards, the penalty will be calculated by:

$$P = (\$100 (\text{Days overdue} - 30)/7) + \text{Savings to IU}$$

Reports more than 30 days overdue, which when presented indicate non-compliance, the penalty will be increased by a factor of 2.

- c. Penalty for failure to accurately report non-compliance

If the failure to report is not willful, but can be attributed to inadequate monitoring and/or record keeping, the penalty will be calculated by:

$$P = \$ 100 \text{ per day of non-compliance} + \text{Savings to IU}$$

In the case of a willful attempt to conceal non-compliance, the Partner attorney should be consulted concerning the need to bring a criminal complaint. The monetary penalty for willfully attempting to conceal non-compliance will be calculated by:

## CHAPTER 5: ENFORCEMENT RESPONSE PLAN

$$P = \$500 \text{ per day of non-compliance} + \text{Savings to IU}$$

### H. Reimbursement

The Partner(s) will seek recovery of costs for damage in addition to any fines, civil penalties, and/or criminal penalties imposed for non-compliance. Reimbursement may be sought for damage done to the collection system, labor and administrative costs associated with mitigating or investigating any noncompliance, and any penalties or requirements imposed by regulatory agencies due to an indirect discharge.

The FM or EPM and the local Directors will determine the total of the direct expenses to the POTW and/or Partners and the Costs of Damages and submit this total to the local jurisdiction Attorney(s) for collection. Reimbursement will be assessed separately and without consideration for penalties already imposed or under consideration.

The charges assessed will recover all costs incurred by any Partner due to pass-through or interference; such costs may include, but are not limited to:

- Fines levied against any Partner by any regulatory agency as a result of the pass-through or interference,
- Costs of litigation and/or settlement of any third party lawsuits brought against any Partner and/or individual employee of any Partner as a result of the pass-through or interference, or
- Costs of time and materials to remediate any environmental damage or other problems caused by the pass-through or interference.

### I. Criminal Penalties

Criminal Penalties are imposed by the courts. The FM or EPM and local Director will consult the local Attorney concerning the imposition of Criminal Penalties in the form of fines or imprisonment. The local Attorney will determine if any aspects of the non-compliance, the IU's compliance history, and the nature of the criminal conduct may have bearing on criminal penalties. If any of these aspects apply, the local Attorney will present them to the prosecuting agency.

### J. Modification of Penalties for Good Faith or Incentive to Compliance

The Executive Director and/or Local Director may defer or reduce an administrative fine and/or civil penalty or a portion thereof for good faith efforts to achieve compliance or extenuating circumstances provided that a compliance schedule or other mechanism for insuring compliance is included in the proposed enforcement action.

The following elements should be considered in reducing or deferring any penalty:

## **CHAPTER 5: ENFORCEMENT RESPONSE PLAN**

1. Demonstration of good faith efforts by the IU to comply with pretreatment standards and requirements including:

- Attempts to remedy the non-compliance prior to enforcement
- Prompt compliance efforts resulting in substantial compliance significantly ahead of any schedule issued by LOTT and/or its Partners
- Provision of adequate facilities and operating procedures
- Prompt notification of non-compliance

### **5.5 PARTNER ACCOUNTABILITY**

Should a dispute arise between any Partner and personnel or agents of the LOTT Cleanwater Alliance regarding any application of the LOTT Regulations, the issue shall be submitted to the LOTT Board. The determination of a majority of the LOTT Board shall be given in writing and the recommended action shall be followed by all Partners.

A majority of the LOTT Board may penalize any single Partner for failure to apply and enforce the LOTT Regulations. This penalty may include requiring that the total of all fines, fees and other charges which are due and payable be paid by the offending Partner to LOTT for each day the Partner fails to apply and enforce the regulations. The offending Partner shall indemnify and hold LOTT harmless against any damages, penalties or other losses incurred as a result of the Partners failure to enforce the LOTT Regulations. Without limitation, LOTT may obtain the remedy of specific performance from a court of competent jurisdiction to require the offending Partner to enforce the LOTT Regulations.

# 2019 INDUSTRIAL USER TRACKING



DMR MONTH	CITY OF LACEY										CITY OF TUMWATER						ZERO DISCHARGERS										
	INTERNATIONAL PAPER CO.					THURSTON CO. WARC					PEPSI NW BEVERAGES						CT SPEC.		WINSOR		SETINA		ROY'S				
	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	Semi - Annual	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	Semi - Annual	Site Visit	Semi - Annual	Site Visit	Semi - Annual	Site Visit	Semi - Annual	Site Visit	Semi - Annual		
JAN	02/13	02/15	02/20				02/15	02/20	02/20			02/13	02/13	02/13													
FEB	03/07	03/07	03/18				03/15	03/18	03/18			03/13	03/13	03/18								02/14 S					
MAR	04/12	04/15	04/16			03/06	04/15	04/15	04/16			04/08	04/08	04/08	3/27 U	03/28	03/13										
APR	05/10	05/14	05/14	4-9 U			05/13	05/14	05/14			05/14	05/14	05/14				4/17 U			07/03			07/29	4-16 U	07/26	
MAY	06/11	06/11	06/18				06/12	06/12	06/18	5/7 U		06/06	06/10	06/10													
JUNE	07/05	07/08	07/18				07/15	07/16	07/18			07/12	07/12	07/12													
JULY	08/05	08/06	09/06				08/15	08/16	09/06			08/08	08/09	08/09													
AUG	09/11	09/12	09/18				09/11	09/12	09/18	8/28 S	08/28	09/12	09/13	09/13													
SEPT	10/11	10/17	10/17	09/04	09/04	09/04	10/14	10/15	10/17			10/10	10/11	10/11	09/24		09/18										
OCT	11/13	11/14	11/14				11/12	11/13	11/14			11/12	11/13	11/13							01/13			01/06		01/13	
NOV	12/11	12/12	12/13				12/13	12/13	12/13			12/10	12/10	12/10													
DEC	01/10	01/10	01/13				01/13	01/13	01/13			01/14	01/14	01/14				12/11						12/11		12/10	12/12

DMR MONTH	CITY OF OLYMPIA																			Annual Report (due by 1/15/2020)	Annual Site Visit		
	CROWN CORK & SEAL CO.						FISH BREWING CO.						GEORGIA-PACIFIC CORRUGATED, LLC						PORT OF OLYMPIA				
	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	Semi - Annual	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	Semi - Annual	DMR Rcvd.	RFORM	Excess Charge Emailed	Site Visit	POTW Monitoring	Semi - Annual	Site Visit			Semi - Annual	
JAN	02/14	02/14	02/14				02/15	02/20	02/20				02/13	02/14	02/20					01/03			
FEB	03/15	03/18	03/12				03/13	03/13	03/13				03/12	03/12	03/13								
MAR	04/15	04/16	04/11				04/10	04/12	04/12				04/10	04/11	04/11	3/26 U							
APR	05/15	05/20	05/01				05/07	05/14	05/14	4-10 S			05/13	05/14	05/14								
MAY	06/14	06/18	06/03	5/7 U	05/07	05/23	06/06	06/10	06/12				06/11	06/11	06/12								
JUNE	07/15	07/15	07/11				07/16	07/18	07/18			06/25	07/12	07/12	07/18								
JULY	08/15	08/15	08/13				08/19	08/19	08/19				08/13	08/14	08/19	07/09	07/09	07/09				01/03	09/04
AUG	09/13	09/16	09/13				09/05	09/06	09/18				09/12	09/12	09/18								
SEPT	10/15	10/16	10/15				10/09	10/10	10/17				10/15	10/16	10/17								
OCT	11/15	11/15	11/13	10/23			11/07	11/12	11/14				11/13	11/14	11/14								
NOV	12/13	12/17	12/12			11/25	12/04	12/04	12/12				12/10	12/12	12/12								
DEC	01/14	01/14	01/10				01/07	01/07	01/17	12/04	12/04	12/19	01/15	01/16	01/17								