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**P1. ANNUAL PRETREATMENT PERFORMANCE SUMMARY**

1. Name of Facility: **Riverside Park Water Reclamation Facility**
2. Permit number: **NPDES #WA-002447-3**
3. Annual report start date: **January 1, 2010** End date: **December 31, 2010**
4. Date of last PCI or **(Audit)** (Circle which): **August 23-24, 2010**
5. Number of SIUs: **10**  
City: ALSCO-Steiner Corp., Brenntag Pacific, Darigold, Dash Connector Technology, EZ Loader, Goodrich Corporation, Hollister-Stier Labs, Johanna Beverage, Sacred Heart Medical Center Laundry, Spokane Metal Finishing
6. Number of Categorical Industrial Users (CIUs): **6**  
(Darigold, Dash Connector Technology, EZ Loader, Hollister-Stier Labs, Johanna Beverage, Spokane Metal Finishing)
7. Number of SIUs without control mechanisms: **0**
8. Number of SIUs not inspected or sampled: **0**
9. Number of SIUs in SNC with standards or reporting requirements: **0**
10. Number of SIUs in SNC with self-monitoring requirements: **0**
11. Number of SIUs in SNC with self-monitoring requirements & not inspected or sampled: **0**
12. Date of NPDES permit was modified to require implementation of a pretreatment program: **Sept. 13, 1985**
13. Has there been a technical evaluation for development of local limits? **Currently in progress.**
14. Have technically based local limits been adopted? **Yes** When? **January 19, 1993.**
15. Number of SIUs in SNC with pretreatment compliance schedules: **0**
16. Numbers issued for SIUs:  
Notice of Violations: **14** (Darigold, Johanna Beverage, Hollister Stier, Goodrich)  
Administrative Orders: **0**  
Civil Actions: **0**  
Criminal Actions: **0**
17. Number of SIUs in SNC published: **0**
18. Number of IUs from which penalties were collected: **0**

**PARTICIPATING AGENCIES****A. Airway Heights**

This report includes the sewer service area within the locality of Airway Heights, Washington.

**B. Spokane Valley**

Spokane Valley determined in October 2004 that the City of Spokane could implement its Industrial Pretreatment Program with Significant Industrial Users that are connected to the City's POTW by City-owned sewer lines within Spokane Valley city limits.

**P2. LISTING OF ALL PERMITS ISSUED BY CITY OF SPOKANE IN 2010****New Permitted Facilities**

City of Spokane issued one new permit on March 1, 2011 to **Dash Connector Technology, Inc.**

**Figure 1: Modified or Renewed Permits for Significant Industrial Users in 2010**

<b>Significant Industrial User</b>	<b>Address</b>	<b>Permit Application</b>	<b>Permit Status</b>
EZ Loader Boat Trailers	717 N. Hamilton St., Spokane	April 21, 2010	Permit renewed on July 1, 2010
Spokane Metal Finishing	1519 E. Trent Ave. Spokane	April 9, 2010	Permit renewed on September 1, 2010
Johanna Beverages, Inc.	5625 W. Thorpe Rd., Spokane	June 11, 2009	Permit renewed on February 1, 2010
Darigold-Spokane	33 E. Francis Ave., Spokane	October 27, 2009	Permit renewed on September 1, 2010
Hollister-Stier Laboratories	3525 N. Regal St., Spokane	April 1, 2010	Existing permit extended. Extension in effect until new permit issued in 2011.
Goodrich Carbon Products	11135 W. Westbow Rd. PO Box 19210 Spokane, WA 99219	August 8, 2010	New permit issuance date June 2011 (tentative).

The City of Spokane continued examining new industries to determine if they need to be permitted. The master list of existing industries was also examined, as part of our Industrial Wastewater Survey (IWS). The City will issue permits to industries required to be permitted by Federal and State regulations or policies, and industries that have the potential to affect the treatment system.

### **EZ Loader Boat Trailers**

The City of Spokane Pretreatment Program renewed EZ Loader Boat Trailers' permit on July 1, 2010. The new permit will expire on June 30, 2015. An updated Accidental Spill and Prevention Plan was submitted and approved in conjunction with the permit renewal. The renewed permit contains a compliance schedule for completion of an Engineering Report by July 1, 2011. An Operation and Maintenance Manual will be included with Engineering Report submittal. There were no major changes to the process compared to the previous permit.

### **Spokane Metal Finishing**

The City of Spokane Pretreatment Program renewed Spokane Metal Finishing's permit on September 1, 2010. The new permit will expire on August 31, 2015. An updated Accidental Spill and Prevention Plan was submitted and approved in conjunction with the permit renewal. An Operation and Maintenance Manual will be submitted in 2011. There were no major changes to the process compared to the previous permit.

### **Hollister-Stier Laboratories**

The three-year fact-gathering permit that was issued on June 18, 2008 and scheduled for expiration on April 1, 2010 was extended to October 1, 2010. Another extension was issued to facilitate the completion of the permitting process in April 2011. The fact sheet and permit are in the process of being written for a 5 year permit, and is scheduled to be issued on April 1, 2011. This permit will contain monitoring of the two points of compliance to the City of Spokane POTW as though they were separate facilities. The flows from both points of compliance will be treated as one.

### **Darigold-Spokane**

Darigold was issued a new 5-year discharge permit on September 1, 2010. This permit incorporated an instantaneous flow-monitoring limit of 500 gallons per minute because of the large volume of wastewater discharged that contains FOG. The FOG requires regular removal from their side sewer line and has the potential to create sewer overflow in businesses located upstream from this facility.

### **Johanna Beverages, Inc.**

Johanna Beverage was issued a 5-year discharge permit on February 1, 2010. This permit incorporated an increased average monthly discharge limit, from 40,000 to 60,000 gallons per day, because of the insertion of a new production line to meet market needs.

**Goodyear Carbon Products**

Goodyear Carbon Products operates its wastewater discharge to the City of Spokane, by Washington State Department of Ecology (DOE). Throughout the year, Goodrich has completed all ancillary requirements that resulted from a state DOE imposed fine for the comingling of dangerous waste with discharged wastewater. The facility plans and specifications as part of their permit renewal application were accepted by the state DOE in December 2010. They filed an application for renewal of their wastewater permit in August 2010 with the pending approval of their engineering plans and specifications. The state DOE approved their plans and specifications in December of 2010. The plan for writing the 5 year fact sheet & permit, per review by the state and city, addressing and completing the public comment period, and issuing the permit is scheduled for completion on June 1, 2011.

**LISTING OF ALL PERMITS CANCELLED BY CITY OF SPOKANE IN 2010****Reliance Trailer**

Reliance Trailer closed its doors for business on January 16, 2010. The industry's wastewater discharge permit was allowed to expire on January 22, 2010.

**ALK-Abello Source Materials LLC, (Formally Biopol Laboratories, Inc.)**

They began the year with a notification to discontinue operation in Spokane because of the planned opening of their new enlarged facility in Post Falls Idaho. On January 15 2010, they ceased production at this facility and by the 31<sup>st</sup> of January 2010, they evacuated their Spokane Facility. The evacuation of the facility included completion of the move to Post Falls, clean up of the Spokane facility, and turning the facility back to the owner of the building after being inspected by the City of Spokane.

**REPORT ON COMPLIANCE OF SIUs WITH COMPLIANCE SCHEDULES**

No SIUs were under compliance schedules in 2010.

## INDUSTRIAL WASTEWATER SURVEY

The 2010 Industrial Waste Survey continued to utilize the reorganized system from 2009 to gather updated wastewater and process information about local businesses. This was accomplished by mailing survey forms to Industrial Users. A Master List of potential Significant and Minor Industrial Users was continually updated using the following resources:

Past surveys, City of Spokane business lists, list of top 100 water consumers, online searches, phone books, Journal of Business, City Pre-Development Meeting agendas, Fire Dept. Hazardous Waste and Liquid Flammables Permits, EPA PCB Waste Handlers database, EPA Envirofacts Warehouse, and the Department of Ecology Newsletters.

The completed returned surveys were used to determine if each facility fell within the guidelines which would designate them as a “Significant Industrial User.” Guidelines are defined below:

- “1. An Industrial User subject to Categorical Pretreatment Standards, or
2. An Industrial User that:
  - a. Discharges an average of twenty-five thousand (25,000) gpd or more of Process Wastewater to the POTW (excluding sanitary (Domestic Wastewater), Noncontact Cooling and boiler blow down wastewater); or
  - b. Contributes a Process Wastestream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the Wastewater Treatment Plant. As used herein “organic capacity” means the capacity of the Treatment Plant to treat Wastewater as opposed to the “hydraulic capacity” or capability to accept and handle fluids; or
  - c. Is designated as such by the Superintendent on the basis that it has a reasonable potential to cause an adverse effect on the POTW’s operation, adverse impact on the City’s ability to comply with its NPDES permit, cause the POTW to violate any Pretreatment Standard or Requirement or because of other regulatory control needs.”

[Source: Spokane Municipal Code 13.03A.0103, “Definitions”]

“Minor Industrial Users” (MIUs) were defined as those industries which do not qualify as SIUs but are of potential concern to the POTW. MIUs are those that are Zero Discharge or belong to the City’s User Charge Program, store chemicals in barrels, generate dangerous waste, or warrant regular monitoring due to flow, complaints, or violations of the General Pretreatment Standards. Businesses discharging less than 25,000 gpd of water from only nonprocess sources such as toilets, small laundry facilities, and showers were defined and filed as “Domestic Equivalent.” Businesses excluded from survey completely included retail, hotels/motels, and office buildings. These categories are assumed domestic equivalent. Businesses that are not designated as an SIU or MIU are placed on an eliminated list. Certain target industries on this list will be sent BMPs as part of future IWS efforts. If more information about any businesses was required, phone calls were made or visits to the industry were made.

Multiple Best Management Practices (BMP) lists for Industrial Users were updated in 2010 using the same resources that aided in producing the Master List of IUs. Businesses were added to target industry lists as they became known, and BMPs were mailed out to new nursing homes, veterinary practices, medical facilities and auto repair shops within the City of Spokane. All written BMPs will be updated and posted on the POTW's website in 2011.

A major effort was initiated to reduce the amount of fats, oils and grease (FOG) in the sanitary sewer system. Food Service Establishments (FSE) were identified using information from the Spokane County Health District restaurant inspection program, the Washington Restaurant Association, the master IWS database, and the yellow pages. An informational pamphlet and a plastic-coated poster for kitchen posting were created using materials from Clean Water Services of Hillsboro, Oregon as models (by permission) and sent out to approximately 1300 FSEs in the POTW's service area. The pretreatment team met with staff members from sewer maintenance to initiate collaboration on FOG prevention. At their suggestion, FOG informational materials were also sent to all nursing homes in the area. The pretreatment team has also begun to meet with local FSE managers whose establishments' pipes have been seen to be clogging with FOG. The managers are given information on BMPs and grease trap/interceptor maintenance.

Any businesses of interest outside of city limits that were found during the survey process were referred to the appropriate jurisdiction, determined by location. City of Spokane has been working closely with the City of Airway Heights and Spokane County to identify potential Significant Industrial Users. City of Spokane also continues to monitor businesses located outside of city limits that have the potential to cause pass through or interference at Riverside Park Water Reclamation Facility.

The City of Airway Heights is in the process of developing their own wastewater treatment plant and IWS. They report that no new industry has moved into the area that is on the sewer system. They have been monitoring all new and potential businesses through their planning and building departments as well as driving around the city on a daily basis, and will be sending out new surveys early next year in order to compile a current list before the new plant starts up.

### **Additions and Deletions to Significant Industrial User List**

**Figure 2: Additions to Significant Industrial User List**

<b>Facility Name</b>	<b>Address</b>	<b>Permit Application</b>	<b>Permit Status</b>
Dash Connector Technology	3915 E Francis Ave Building C-6	October 22, 2010	Effective March 1, 2011

Dash Connector Technology is a facility that manufactures electrical connectors and other components primarily for the petroleum industry. After inspection of the facility, Dash Connector Technology was designated as an SIU. This industry falls under the Categorical Pretreatment Standards of 40 CFR 433, Metal Finishing Point Source Category.

**Figure 3: Deletions to Significant Industrial User List**

<b>Facility Name</b>	<b>Address</b>	<b>Permit Application</b>	<b>Permit Status</b>
Reliance Trailers	5304 N Florida St	Permitted SIU	Expired 01/22/10

**Zero-Discharge Industrial Users**

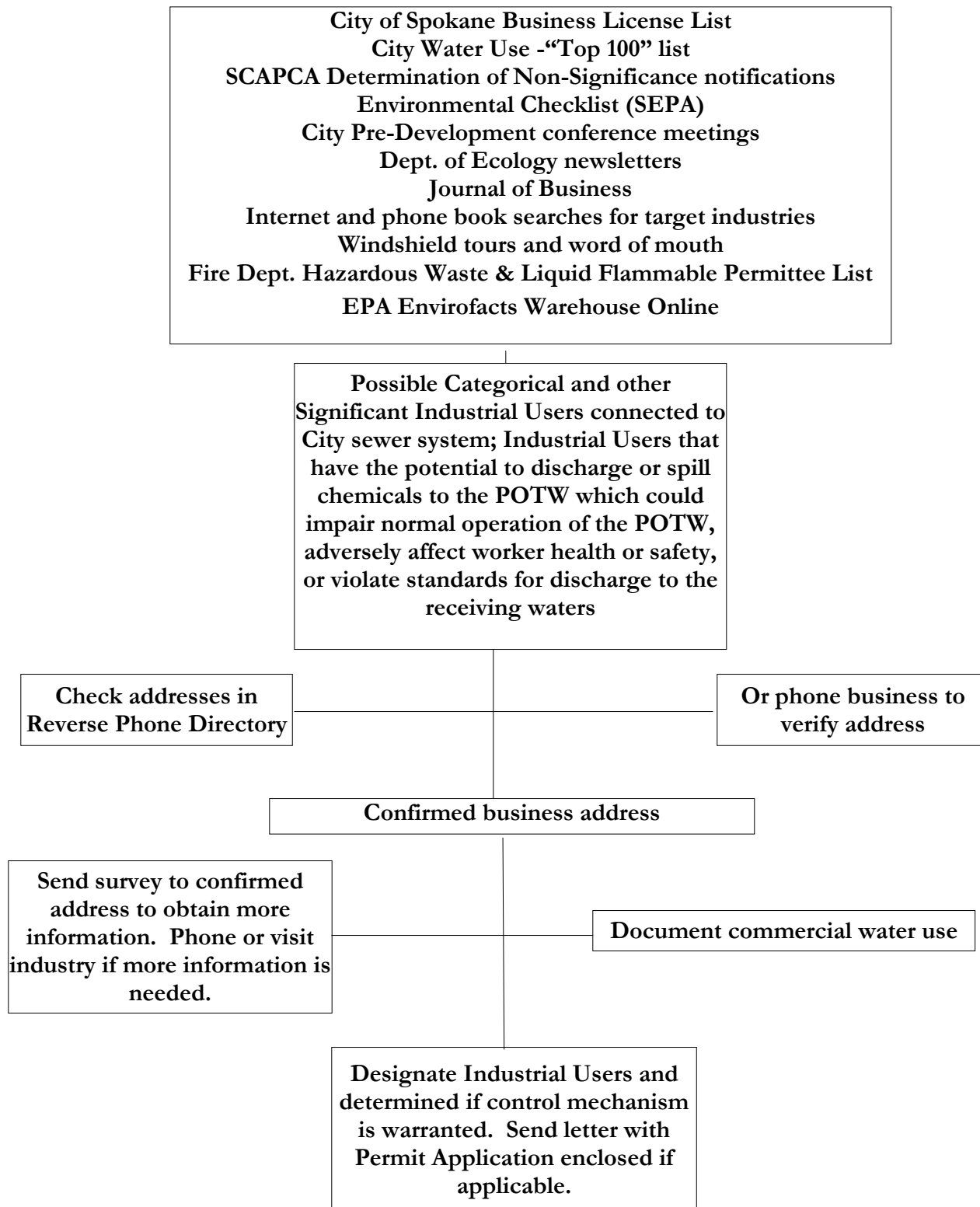
Zero-Discharge Industrial Users conduct operations for which categorical pretreatment standards would apply if there were a discharge of wastewater, but which currently do not discharge process wastewater to Riverside Park Water Reclamation Facility. These users have no reasonable potential for adversely affecting the POTW or for violating any pretreatment standard. As part of City of Spokane's Industrial Wastewater Survey, Zero Discharge Industrial Users are identified, inspected on-site and certified annually to ensure no changes with regards to discharge have been made.

In 2010, fourteen industries were certified as Zero-Discharge IUs following on-site inspections:

<b>ADM Milling Company</b>	40 CFR 406	Grain Mills Manufacturing
<b>American West Chrome</b>	40 CFR 433	Metal Finishing
<b>Evergreen Powder Coating</b>	40 CFR 433	Metal Finishing
<b>Fluid Design Products Inc.</b>	40 CFR 420	Iron and Steel Manufacturing
<b>Inland Empire Plating</b>	40 CFR 433	Metal Finishing
<b>Leisure Concepts</b>	40 CFR 433	Metal Finishing
<b>Lyn-Tron</b>	40 CFR 420	Iron and Steel Manufacturing
<b>PETNET Pharmaceuticals Inc.</b>	40 CFR 439	Pharmaceutical Manufacturing
<b>Proto Manufacturing</b>	40 CFR 433	Metal Finishing
<b>Spokane Galvanizing</b>	40 CFR 420	Iron and Steel Manufacturing
<b>Sytech</b>	40 CFR 433	Metal Finishing
<b>TriplePlate Chrome</b>	40 CFR 433	Metal Finishing
<b>Wear-Tek</b>	40 CFR 464	Metal Molding and Casting
<b>Western States Asphalt</b>	40 CFR 443	Paving and Roofing

Updating the Industrial Wastewater Survey:

Figure 4: Information Sources for Industrial Wastewater Survey (IWS)



### P3. ENFORCEMENT

The City of Spokane Enforcement Response Manual was updated in 2009. The Enforcement Response Manual defines violations and illustrates a standard range of responses to insure compliance with pretreatment regulations. One of the principles of enforcement followed by the City of Spokane’s Industrial Pretreatment Program is escalating enforcement. Escalating enforcement penalizes repeat offenses with an increasing array of penalties to encourage compliance in a timely manner. **Four** facilities were notified of escalating enforcement, and given Notices of Violation to comply.

**Figure 5: INDUSTRIAL COMPLIANCE SUMMARY (Significant Industrial Users)**

SIU	PERMIT DATE ISSUE/EXPIRE	MONITORING FREQUENCY	SELF MONITOR	COMPLIANCE Y/N	*SNC (SEE CODE)
ALSCO-Steiner Corp.	5/01/2006-4/30/2011	2/year	Yes	Y	
Brenntag Pacific	04/01/2009-03/31/2014	2/year	Yes	Y	
EZ Loader Boat Trailers	7/01/2010-06/30/2015	2/year	Yes	Y	
Hollister-Stier Laboratories	4/01/2007-Permit Issued	2/year	Yes	N	
Darigold Spokane	09/01/2010-08/31/2015	2/year	Yes	N	
Goodrich Carbon Products	2/1/04-New Permit Issued	2/year	Yes	N	
Johanna Beverage Co.	02/01/2010-01/31/2015	2/year	Yes	N	
Reliance Trailer	1/23/2006-1/22/2010	0/year	Yes	Y	
Sacred Heart Medical Center Laundry	6/18/2007-6/17/2012	2/year	Yes	Y	
Spokane Metal Finishing	09/01/2010-08/31/2015	3/year	No	Y	
Compliance: Status indicated regardless of degree of non-compliance "Y" indicates complete discharge compliance "N" indicates non-compliance of any discharge limit.			Code for SNC, numbers indicate violation of (1) Wastewater Discharge Limits (2) Progress Report Late		

**ALSCO-Steiner Corp.**

ALSCO had no issues of non-compliance in 2010. Manifests for the annual settling tank pump-out were submitted to the City in a timely manner.

**Brenntag Pacific Inc.**

Brenntag Pacific had no issues of non-compliance in 2010. The industry always requests the City's approval very far in advance if any new chemicals are being considered for storage.

**Darigold LLC, Spokane**

Darigold of Spokane experienced three violations for low pH, exceeding their limit of 5.0, during 2010. They also experienced seven violations for exceeding their instantaneous flow limit on 500 gallons per minute. They were issued five (5) Notices of Violations (NOV) in 2010 for these infractions of their permit

**E Z Loader Boat Trailer**

E Z Loader Boat Trailer had no issues of non-compliance in 2010.

**Hollister Stier Laboratories**

Hollister-Stier Laboratories was cited for twenty (20) low pH violations that exceeded their limit of 5.0, and for two (2) violations of their maximum daily flow limit of 140,000 gallon per day flow during 2010. They were issued four (4) Notices of Violation for the preceding infractions of their wastewater discharge permit.

**Johanna Beverage Co.**

Johanna Beverage was cited for twelve (12) low pH violations that exceeded their limit of 5.0, and for six (6) high pH violations that exceeded their limit of 12.0 during 2010. They were issued four (4) Notices of Violation for the preceding infractions of their wastewater discharge permit in 2010.

**Goodrich Carbon Products**

Goodrich Carbon Products accumulated six (6) low pH violations that exceeded their limit of 5.0 during 2010. They received a final warning letter from Washington State Department of Ecology, the permitting authority, for violation during the first half of the year. They were issued one (1) Notice of Violation for a low pH violation that occurred in October 2010.

**Reliance Trailer**

Reliance Trailers went out of business in late 2009 and allowed their discharge permit to expire on its last effective day of January 22, 2010.

**Sacred Heart Medical Center Laundry**

Sacred Heart did not have any compliance issues in 2010. They have taken many steps to achieve accurate, reliable data from their new monitoring station.

**Spokane Metal Finishing**

Spokane Metal Finishing had no issues of non-compliance in 2010.

The figure below describes the amount of resources devoted to the above activities, in relation to maintenance of the rest of the permitted facilities.

**Figure 6: ENFORCEMENT ACTIVITY (Number of Actions Taken)**

<b>Significant Industrial User</b>	<b>Call FAX email</b>	<b>Meeting Not Inspections</b>	<b>Letter</b>	<b>Notice</b>	<b>Adm. Order</b>	<b>Penalty</b>
ALSCO-Steiner Corp.	0	0	0	0	0	0
Brenntag Pacific	0	0	0	0	0	0
E Z Loader Boat Trailer	0	0	0	0	0	0
Hollister-Stier Laboratories	8	2	0	4	0	0
Darigold LLC, Spokane	10	4	2	5	0	0
Goodrich Carbon Products	9	2	1	1	0	0
Johanna Beverage Company	6	2	0	4	0	0
Reliance Trailer Company	0	0	0	0	0	0
Sacred Heart Medical Center Laundry	0	2	0	0	0	0
Spokane Metal Finishing	0	0	0	0	0	0

The City of Spokane Industrial Pretreatment Program's goal is to provide sampling and inspection of all permitted facilities. When new facilities are permitted and self-monitoring helps determine whether they are in compliance with their permit, industries will be required to provide self-

monitoring reports in a timely fashion. All facilities are subject to random sampling and inspection, especially if information indicates that noncompliance has occurred.

The figure below describes the sampling and inspection schedule in 2010 and planned for 2011.

**Figure 7: INDUSTRIAL MONITORING SCHEDULE**

Significant Industrial User	Wastewater Mgmt. Sampling Frequency / Year			Inspection Frequency / Year		
	Planned 2010	Performed 2010	Planned 2011	Planned 2010	Performed 2010	Planned 2011
ALSCO-Steiner Corp. <sup>(2)</sup>	2	2	2	1	1	1
Brenntag Pacific <sup>(2)</sup>	2	2	2	1	1	1
Dash Connector Technology <sup>(2)</sup>	0	0	1	0	0	1
Darigold <sup>(3)</sup>	2	7	2	1	2	1
EZ Loader Boat Trailer <sup>(2)</sup>	2	2	2	1	1	1
Goodrich <sup>(2)</sup>	1	2	1	1	1	1
Hollister-Stier Laboratories <sup>(2)</sup>	2	2	2	1	2	1
Johanna Beverage Company <sup>(2)</sup>	2	2	2	1	2	1
Reliance Trailer Co.	0	0	0	0	0	0
Sacred Heart Medical Center Laundry <sup>(2)</sup>	2	2	2	1	1	1
Spokane Metal Finishing <sup>(1)</sup>	2	2	2	1	1	1

NOTES:

- 1) Facility is not self-monitoring. All sampling performed by POTW.
- 2) This permittee is self-monitoring. Discharge monitoring report is due each month.
- 3) Darigold sampling performed for User Surcharge as well as compliance with permit. Company reports continuous pH and flow measurements. Discharge monitoring report is due each month.

#### P4. PROGRAM CHANGES

2010 marked twenty-five years of operation for the City of Spokane's Industrial Pretreatment Program. There were substantial changes to the Pretreatment Program in 2010. Staff duties continued to be re-allocated to facilitate maintenance of the existing program. A key element in reallocation of staff duties is more program support and development of BMP's. We are looking forward to improving coordination with wastewater collection system personnel and increased public information.

Also in 2010, the City of Spokane and Spokane County continued to look at Local Limits. As stated in previous reports, the City of Spokane and Spokane County are in the process of jointly re-evaluating local limits for the Riverside Park Water Reclamation Facility, as well as developing local limits for the County's proposed reclamation facility. During 2008, the City and County conducted "clean" sampling in six domestic basins to establish domestic loadings on the Riverside Park Water Reclamation Facility (RPWRF) and the County's proposed facility, Spokane County Regional Water Reclamation Facility (SCRWRF). The City and County hired Brown and Caldwell Engineers as consultants during this process. Adam Klein with Brown & Caldwell Engineering is providing technical support, calculating different local limit scenarios. The tool used to evaluate the Local Limits is "newll9.xls," a Microsoft Excel spreadsheet program developed by David J. Knight, P.E., Washington Department of Ecology, distributed at the Pacific Northwest Pretreatment Conference on 9/13/2007. Scenarios and assumptions have been developed and will be presented to City and County decision makers during 2011. The concentration-based local limits listed in Appendix B will remain in effect until the re-evaluation process is completed.

On April 26, 2010, a multijurisdictional agreement covering industrial pretreatment, between the City and County was presented to the City's Public Works Committee. The agreement was adopted by City Council on May 17, 2010. During 2010 the City also drafted a multijurisdictional agreement with Spokane Valley that will give the City the legal authority in the Yardley, or eastern sections of the City of Spokane Valley. In addition to the Spokane Valley multijurisdictional agreement, the City is working on agreements with Airway Heights and Fairchild Air Force Base.

Finally, during 2009, Spokane County adopted all elements of the City ordinance with minor changes to language, based on comments by Ecology and differences between City and County administrative procedures. The language changes in the County's Ordinance except for administrative procedural differences will be incorporated into the City's ordinance for consistency. The City anticipates opening its pretreatment ordinance in 2011 to include the changes listed above and to update local effluent limitations.

## **P5. INDUSTRIAL USER PERMITS**

### **A. Categorical Industrial Users**

The City has determined that there are 6 Significant Industrial Users (SIUs) that conduct activities that are listed in the federal Pretreatment regulations listed in 40 Code of Federal Regulations (CFR) 405 to 471. The industries are: Dash Connector Technology, EZ Loader, Hollister-Stier Labs, Darigold, Johanna Beverage and Spokane Metal Finishing. Please refer to Figure 7, INDUSTRIAL MONITORING SCHEDULE.

The City has developed a schedule to monitor its industrial wastewater discharge permit holders for compliance with permit limitations derived from federal categorical standards and local effluent limitations at a minimum of two times a year. Typically, this monitoring is unscheduled. We have employed this compliance monitoring strategy because we feel that unscheduled monitoring results are more accurate than those submitted by an industry on a self-monitoring report, and monitoring frequency can be minimized as a result of the unscheduled monitoring.

The City of Spokane is moving towards increased reliance on self-monitoring. The City feels this requires the industry to take a more proactive role in wastewater compliance. The industrial user reports self-monitoring data at intervals specified in the permit. In most cases, the reports are submitted to the City monthly. The City uses self-monitoring data to assess compliance with permit limitations. Self-monitoring data showing permit violations may also be used as primary evidence in an enforcement action. In many cases, however, additional information may be needed to verify or supplement self-monitoring data. Where independent evidence is gathered by the City, self-monitoring data may be used as corroborative evidence in the enforcement action.

### **B. Non-Categorical Industrial Users**

The City of Spokane has determined that there are 4 Non-Categorical Significant Industrial Users (SIUs). The industries are ALSCO-Steiner Corporation, Brenntag Pacific, Goodrich Corporation, and Sacred Heart Medical Center Laundry. Goodrich Corporation is currently under permit by the Washington Department of Ecology (Ecology). Ecology is currently drafting a new permit for Goodrich. Once the permit issued, the City will assume control of this permit.

Please refer to Figure 7, INDUSTRIAL MONITORING SCHEDULE

The City has developed a schedule to monitor its industrial wastewater discharge permit holders for compliance with permit limitations derived from federal categorical standards and local effluent limitations at least two times a year. Typically, this is unscheduled monitoring or compliance monitoring. We have employed this compliance monitoring strategy because we feel that unscheduled monitoring results are often more representative than those submitted by an industry on a self-monitoring report, and monitoring frequency can be minimized.

The City of Spokane is moving towards increased reliance on self-monitoring. The City of Spokane feels this requires the industry to take a more proactive role in wastewater compliance. Self-monitoring data is reported by the industrial user at intervals specified in the permit. The reports will be submitted to the City monthly. The City will use self-monitoring data to assess compliance with permit limitations. Self-monitoring data showing permit violations may also be used as primary evidence in an enforcement action. Where independent evidence is gathered by the City, self-monitoring data may be used as corroborative evidence in the enforcement action.

Participants in the hauled waste program monitoring results are a matter of record. Additional monitoring will be performed in 2011. All non-domestic hauled waste is manifested before it is discharged to the treatment facility. There were 27 authorized industrial wastewater discharges in 2010.

### **C. Reduced Reporting Categorical Users**

Of the SIUs listed above, several have been permitted with the City of Spokane Industrial Pretreatment Program for a significant time. Each time the permit cycle is completed, the compliance monitoring data is reviewed. The companies that have few or no violations of their permit limitations are rewarded with the minimal compliance monitoring schedule, monitoring performed semi-annually.

**P6. STAFF/RESOURCES**

Please refer to Figure 8, RESOURCE SUMMARY below, to determine the level of effort expended by the City of Spokane in labor and materials to implement and maintain the Industrial Pretreatment Program. The first table in Figure 8 contains staff labor (FTE'S) for each pretreatment program element, projected and actual in years 2010 and 2011.

The second table in Figure 8 represents the pretreatment program staff costs and the associated FTE data for 2010 and 2011 (projected).

The City continues to utilize its resources carefully to provide competent and complete implementation of the pretreatment program. The City's pretreatment staff consists of fully trained professionals who are an integral part of a system that provides legally defensible and scientifically sound pretreatment program. The City continues to use clerical staff to input data into a database program designed specifically to monitor and maintain pretreatment permits. There have been no changes in the number of laboratory technicians and chemists who provide the bulk of the staff resources required for a complete pretreatment program.

The third table in Figure 8 contains Equipment and Supplies for the pretreatment program listed by projected and actual usage for years 2010 and 2011. For the year 2011, the estimated analytical costs associated with pretreatment (which includes new permit requirements) have been added. These costs have always been incurred but not included in this summary.

The City intends to continue to budget adequate funding for Pretreatment capital equipment and supplies for 2011. Figure 8 shows that the City is committed to providing sufficient funding for an ongoing Pretreatment Program.

**Figure 8: RESOURCE SUMMARY**Staff Labor: (FTE's)

<i>Item</i>	<i>2010 (projected)</i>	<i>2010 (actual)</i>	<i>2011 (projected)</i>
Legal Assistance	Variable	Variable	Variable
Permitting	1.00	1.00	1.00
Inspections	1.00	1.00	1.00
Sample Collection	2.00	2.00	2.00
Sample Analysis	1.00	1.00	1.00
Data Evaluation	1.00	1.00	1.00
Enforcement	0.50	0.20	0.20
Administration	0.50	0.60	0.60
<b>TOTAL FTE's</b>	<b>7.00</b>	<b>6.80</b>	<b>6.80</b>

Staff Labor: (Cost)

<i>Item</i>	<i>2010 FTE's</i>	<i>2010</i>	<i>2011 (projected)</i>
Superintendent	0.25	\$33,598	\$34,413
Laboratory Supervisor	0.50	\$55,212	\$55,994
Pretreatment Chemist	3.00	\$261,773	\$269,665
Technician	2.50	\$188,840	\$198,776
Clerk	0.50	\$31,088	\$32,638
<b>TOTAL:</b>	<b>6.75</b>	<b>\$570,512</b>	<b>\$591,485</b>

Equipment and Supplies

<i>Item</i>	<i>2010 (projected)</i>	<i>2010 (actual)</i>	<i>2011 (projected)</i>
Postage/Advertising	\$9,050.00	\$12,616.61	\$14,000
Travel and Training	\$5,500.00	\$3,909.58	\$5,500
Analytical Costs	---	---	\$60,000
Motor Fuel and Lubricants	\$6,000.00	\$4,251.27	\$6,000
Chemical/Lab Supplies	\$40,000.00	\$49,662.39	\$50,000
Capital Lab Equipment/Minor Equipment	\$50,000.00	\$24,481.28	\$50,000
<b>TOTAL COST*</b>	<b>\$110,550</b>	<b>\$94,921</b>	<b>\$185,500</b>

**P7. ASPP**

The City of Spokane submitted an Accidental Spill Prevention Plan to the Department of Ecology for inspection and approval on **October 1, 2001**.

Each permitted facility that stores sufficient amount of dangerous or potentially hazardous chemicals and has the potential to cause chemical spills to the POTW is required to submit and implement an Accidental Spill Prevention Plan. In addition, facilities that have spill incidents or are subjects of complaints received by the Industrial Pretreatment Program may have to submit an Accidental Spill Prevention Plan.

“An ASPP and/or Slug Discharge control plan shall address, at a minimum, the following:

1. Description of Discharge practices, including non-routine batch Discharges;
2. Description of stored chemicals;
3. Procedures for immediately notifying the Superintendent of an Accidental Spill or Slug Discharge which would violate SMC 13.03A.0201 through SMC 13.03A.0204;
4. Procedures to prevent adverse impact from an Accidental Spill and/or Slug Discharge. Such procedures include, but are not limited to, 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;
5. Application for ASPP and/or Slug Discharge plan approvals must be filed with the Superintendent, upon such forms and with such information as required by the Superintendent, signed by an Authorized Representative and certified as provided in SMC 13.03A.0305 B, and include the fee as provided in SMC 13.03A.1401.”

[Reference Spokane Municipal Code 13.03A.0211]

In addition, the City evaluated all Significant Industrial Users, designated before November 14, 2005 for the need for an Accidental Spill Prevention Plan on or before October 14, 2006, as required by the Pretreatment Program federal “Streamlining Regulations,” as stated in 40 Code of Federal Regulations 403.8 (f) 2) (vi). The City of Spokane will evaluate Significant Industrial Users for the need for an Accidental Spill Prevention Plan within one year of being designated an SIU, and will review the existing Accidental Spill Prevention Plan at the beginning of each permit renewal cycle.

## **P8. PROBLEM AREAS OR POTENTIAL PROBLEM AREAS**

Riverside Park Wastewater Reclamation Facility had an incident of upset which depleted the population of biological flora in the Plant resulting in decreased nitrification which caused a high ammonia concentration in the Plant Effluent (9.15 mg/L on Aug. 22, 2010 with a discharge limit of 6.33 mg/L). This biological flora depletion was likely caused by a toxin in the Plant Influent. The Pretreatment staff immediately began research on choosing analytical equipment to aid in identifying any toxins in the event of a future upset. A portable Ramen instrument has been identified as the instrument of choice and bidding procedure will commence soon.

## **ONGOING ACTIVITIES IN 2010**

The City cooperated with enforcement activities involving Goodrich Corporation with the Washington Department of Ecology Eastern Regional Office, Hazardous Waste—Toxics Reduction Unit and Water Quality Section personnel. The compliance issues imposed by the State and City upon Goodrich have been resolved, and those that pertain to the engineering report and O & M issues have been resolved. In the beginning of 2011 work can begin on developing and writing a permit that can be issued in June of 2011.

The City of Spokane also requests assistance in obtaining an Accidental Spill Prevention Plan (ASPP) from Goodrich Corporation, currently permitted by Washington Department of Ecology. The new permit will require Goodrich to submit an ASPP within 90 days of the issuance of the permit to be approved by the State DOE. The City and State are currently working together in developing the new permit for Goodrich to ensure that the concerns and requirements of both are addressed and/or met in the new permit.

City of Spokane and Spokane County are currently working jointly on developing new Local Limits. Domestic sampling and analyses were performed in late 2008. The consulting firm Brown & Caldwell is currently engaged in finalizing new Local Limits. New local limits for RPWRF will be adopted during 2011.

The City also continued to address multijurisdictional agreement (mja) issues during 2010. The first step toward addressing these multijurisdictional issues was completed in 2008, with the new Pretreatment Ordinances were adopted by the City in October 2008, and the County in October 2009. The next step is the multijurisdictional agreement between the City and County that was adopted on June 14 2010. The next steps will be to have the remaining jurisdictions; Airway Heights, City of Spokane Valley, and Fairchild Air Force Base that discharge to the City's POTW adopt the same ordinances and continue development of multijurisdictional agreements with each of these entities. The City of Spokane hopes to develop and complete these agreements during 2011.